

04-428-CD
SECRETARY OF VETERANS AFFAIRS OF WASH. D.C. vs. JOHN DOE, et al.

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

The Secretary of Veterans
Affairs of Washington, D.C.,
his Successors and/or Assigns
1675 Palm Beach Lakes
West Palm Beach, FL 33401
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 04-428-00

v.

John Doe
and/or Tenant/Occupant
1225 Forrest Street
Coalport, PA 16627 (Premises)
Defendant(s)

CIVIL ACTION
COMPLAINT IN EJECTMENT

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

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Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
100 South Street
PO Box 186
Harrisburg, PA 17108
800-692-7375

FILED

MAR 29 2004

William A. Shaw
Prothonotary/Clerk of Courts

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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1. Plaintiff is the corporation or individual named on the caption, and whose address or principal office appears in the caption.

2. Defendant(s) are those named as such on the caption, and occupy the premises (hereinafter "Premises") which address is set forth on the caption.

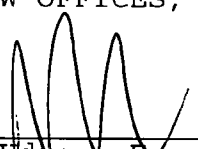
3. Premises, a legal description of which is attached hereto, was sold at Sheriff's Sale in accordance with law on July 11 2003, and Plaintiff became owner thereof as a result of being the successful bidder and thus the purchaser at said sale, and remains real owner thereof. (Abstract of Title).

4. The person(s) in possession of Premises are the Defendant(s) herein, and are occupying Premises without right or claim to title.

5. Plaintiff has demanded possession of Premises from Defendant(s) who have refused to deliver up the possession thereof.

WHEREFORE, Plaintiff demands judgment for immediate possession of Premises, issuance of a Writ of Possession and a judgment of its costs and disbursement in this action.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
ATTORNEY FOR PLAINTIFF

ALL THOSE CERTAIN two lots of land, situate in the Borough of Coalport, County of Clearfield and State of Pennsylvania, same known as Lots Numbered two and four in the J.D. Spangle Addition to the said Borough of Coalport, bounded and described as follows, to wit:

FRONTING on Forrest Street one hundred (100) feet and running back one hundred fifty (150) feet to Lloyd Alley and adjoining Lots now or formerly of said J.D. Spangle on the North and South.

RESERVING all the coal and other minerals underlying said Lots Numbers two and four; AND it is distinctly understood and is part of this indenture that all persons living on said Lots Numbers two and four are hereby restricted from selling or having sold on said Lots any intoxicating liquors or beer.

ALSO, that certain lot or piece of land situate in the Borough of Coalport, County of Clearfield, and State of Pennsylvania, bounded and described as follows:

BEGINNING at a post on Forrest Street; thence Northward by line of Forrest Street fifty (50) feet to alley; thence Eastward by line of alley one hundred fifty (150) feet to Lloyd Alley; thence Southward by line of said alley fifty (50) feet; thence Westward by line of lot of W.A. Wolfe (now or formerly Price) one hundred fifty (150) feet to post and place of BEGINNING. Known as Lot No. 6 in the J.D. Spangle plot of lots in Coalport Borough.

HAVING THEREON ERECTED A DWELLING KNOWN AS 1225 Forrest Street, Coalport, Pennsylvania.

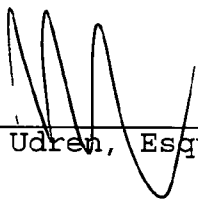
BEING THE SAME PREMISES WHICH Diana Caresani, Patricia Diane Skebeck and Franklin V. Skebeck, by Deed dated May 13, 2000 and recorded May 25, 2000 as Clearfield County Instrument Number 200007263, granted and conveyed unto James C. Browning and Shana L. Browning.

Assessment # 5-H17-420-27

VERIFICATION

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation; that he is authorized to take this verification and does so because Plaintiff must verify through agents and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the facts set forth in the foregoing pleading are true and correct to the best of his knowledge information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire

DATED: March 24, 2004

Atty. Pd.

MAR 12 2004

85.00

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

THE SECRETARY OF VETERANS AFFAIRS

VS.

Sheriff Docket #

15373

04-428-CD

DOE, JOHN and/or Tenant/Occupant

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW APRIL 15, 2004 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOHN DOE and TENANT/OCCUPANT, DEFENDANTS. HOUSE IS "EMPTY" AT 1225 FORREST ST., COALPORT, CLEARFIELD COUNTY, PENNSYLVANIA.

Return Costs

Cost	Description
40.37	SHERIFF HAWKINS PAID BY: ATTY CK# 6662
20.00	SURCHARGE PAID BY: ATTY CK# 8161

Sworn to Before Me This

15th Day Of April 2004

[Signature]

So Answers,

[Signature]
[Signature]
Chester A. Hawkins
Sheriff

FILED

MT 3:29

APR 15 2004

William A. Shaw
Prothonotary

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ATTORNEY FOR PLAINTIFF

WE HEREBY CERTIFY THE
WITHIN TO BE A TRUE AND
CORRECT COPY OF THE ORIGINAL

The Secretary of Veterans
Affairs of Washington, D.C.,
his Successors and/or Assigns
1675 Palm Beach Lakes
West Palm Beach, FL 33401
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 04-428-02

v.

John Doe
and/or Tenant/Occupant
1225 Forrest Street
Coalport, PA 16627 (Premises)
Defendant(s)

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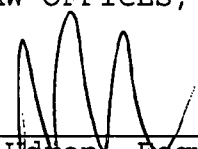
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Assessment # 5-H17-420-27

VERIFICATION

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UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire

DATED: March , 2004

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West Palm Beach, FL 33401
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CIVIL DIVISION
Clearfield County

NO. 04-428-05

v.

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and/or Tenant/Occupant
1225 Forrest Street
Coalport, PA 16627 (Premises)
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W. J. R.
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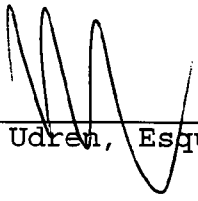
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