

04-1097-CD
ROBERT E GROSSMER, SR VS JADWIGA SLOGOSKA, et al

Robert Gorssmer vs Jadwiga Slogoska et al
2004-1097-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

vs.

JADWIGA SLOGOSKA A/K/A JADINGA
SLAGOSKA, FRANK SLOGOSKI, JOSEPH
SLAGOSKA A/K/A JOSEPH SLOGOSKI,
LEO SLAGOSKA, FRANCES SLAGOSKA,
HELEN SLAGOSKA, BERNICE SLAGOSKA,
their heirs, successors and assigns,
and all other persons known or unknown,
claiming any title by, under or through them,
their heirs, executors, administrators, and
assigns,

Defendants

No. 04-1097-CD

Type of Case: Quiet Title Action

TYPE OF PLEADING:
Complaint

FILED ON BEHALF OF:
Plaintiff

**COUNSEL OF RECORD FOR THIS
PARTY:**

David R. Thompson, Esquire
308 Walton Street, St. 4
P.O. Box 587
Philipsburg PA 16866
(814) 342-4100
Supreme Court ID #73053

FILED Atty pd.
01/15/04 95.00
JUL 20 2004 ICC Atty
SAC
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

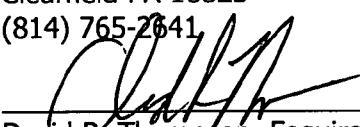
ROBERT E. GROSSMER, SR. A/K/A ROBERT GROSSMER,	*
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	*
	04-
Plaintiff	*
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vs.	*
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	*
JADWIGA SLAGOSKA, A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKI A/K/A JOSEPH SLOGOSKI LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLAGOSKA, BERENICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators, and assigns,	Type of Case: Action to Quiet Title
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	Type of Pleading: Complaint
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Defendants	*

NOTICE

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 Petition 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 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET
FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.**

Court Administrator
Clearfield County Courthouse
Clearfield PA 16823
(814) 765-2641



David R. Thompson, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A	*
ROBERT GROSSMER,	*
	*
Plaintiff	04-
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	*
vs.	Type of Case: Action
	to Quiet Title
	*
	*
JADWIGA SLAGOSKA, A/K/A JADINGA	*
SLAGOSKA, FRANK SLOGOSKI, JOSEPH	*
SLAGOSKA A/K/A JOSEPH SLOGOSKI,	*
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their heirs, successors and assigns,	*
and all other persons known or unknown,	*
claiming any title by, under or through them,	*
their heirs, executors, administrators, and	*
assigns,	*
	*
Defendants	*

COMPLAINT

AND NOW, comes the Plaintiff, ROBERT E. GROSSMER, SR., a/k/a ROBERT GROSSMER, through his attorney, David R. Thompson, Esquire, and set forth a claim against the Defendants named herein and represent as follows:

1. Plaintiff is Robert E. Grossmer, Sr., a/k/a Robert Grossmer, currently of 411 Sarah Street, Osceola Mills, Pennsylvania, 16666.
2. Defendant is Jadwiga Slagoska a/k/a Jadinga Slagoska, who died on June 4, 1947, leaving a Last Will & Testament dated June 27, 1945, in which she appointed

Defendant Frank Slogoski Executor and devised the residue of her estate to Frank Slogoski, Defendant herein.

3. Defendant is Frank Slogoski, who is presumed dead, his heirs, administrators, executors, successors and assigns, whose identities and whereabouts are unknown.

4. Defendant is Joseph Slagoska a/k/a Joseph Slogoski, who is presumed dead, his heirs, administrators, executors, successors and assigns, whose identities and whereabouts are unknown.

5. Defendant is Leo Slagoska, who is presumed dead, his heirs, administrators, executors, successors and assigns, whose identities and whereabouts are unknown.

6. Defendant is Frances Slagoska, who is presumed dead, her heirs, administrators, executors, successors and assigns, whose identities and whereabouts are unknown.

7. Defendant is Helen Slagoska, who is presumed dead, her heirs, administrators, executors, successors and assigns, whose identities and whereabouts are unknown.

8. Defendant is Berenice Slagoska, who is presumed dead, her heirs, administrators, executors, successors and assigns, whose identities and whereabouts are unknown.

9. The subject matter of this action to quiet title is a parcel of land which comprises a portion of a certain piece, parcel or tract of land conveyed to Jadwiga Slagoska a/k/a Jadinga Slagoska by deed dated November 16, 1903 and recorded in Clearfield County at Deed Book 138, Number 107. By way of further pleading, the

subject property became adversely possessed by Catherine Grossmer who died June 7, 2001, leaving to survive her, her children Robert E. Grossmer, Sr. a/k/a Robert Grossmer and Kathryn J. Herr.

10. By deed dated May 27, 2004 and recorded in Clearfield County on June 14, 2004 to Instrument #200409547, Kathryn J. Herr and Al Herr, her husband, conveyed their interest in the property unto Robert Grossmer a/k/a Robert E. Grossmer, Sr.

11. It is believed that Defendants Frank Slogoski, Joseph Slagoska a/k/a Joseph Slogoski, Leo Slagoska, Frances Slagoska, Helen Slagoska, and Berenice Slagoska are heirs at law of Defendant Jadwiga Slagoska a/k/a Jadinga Slagoska and are being added as Defendants to this action for that purpose.

12. The parcel in question consists of a portion of ground situated in the Borough of Osceola Clearfield County marked and designated on the plan of the Borough of Osceola as No. 344.

13. The portion in question is more particularly described as follows:

ALL that certain lot or piece of ground situated in the Borough of Osceola, marked and designated on a certain plan of the Borough of Osceola as No. 344 on the south side of Sarah Street at the distance of fifty feet westwardly from the west side of Elizabeth Street containing in front or breadth on the said Sarah Street fifty feet and extending of that width in length or depth southward one hundred and fifty feet, bounded on the North by Sarah Street on the east by Lot No. 343, on the South by Moshannon Alley and on the West by the Lot No. 345.

14. Further, incident to his ownership of the parcel, the Plaintiff has exercised possession and control of the subject premises.

15. Plaintiff has caused a diligent search and inquiry to be made among the records of the Clearfield County Courthouse, including the Recorder of Deeds and the

street dockets with regard to the subject property, and no deed out of Jadwiga Slagoska a/k/a Jadinga Slagoska for the premises in question could be found entered of record.

16. The Plaintiff and his predecessors in title have exercised dominion, possession and control of the subject premises for a period in excess of twenty-one (21) years, and that said possession has been continuous, open, exclusive and adverse.

17. This Quiet Title action is necessary because of any potential unrecorded conveyances and other irregularities in the chain of title of the property, subject of this action, including possible unrecorded deeds and/or assignments and other documents, incomplete estate records of deceased persons showing a complete chain of title, and possible adverse interest of named Defendants, their heirs, successors, and assigns, all of which create clouds in the title.

18. It is further averred that the Quiet Title Action is necessary because of irregularities in the chain of title of property which may affect the rights of the Plaintiff named.

19. It is finally averred that a Quiet Title Action is necessary to determine the validity or discharge of any document, obligation or deed affecting any right, title, and interest, in the property.

20. At no time have any of the herein named Defendants or anyone claiming title by, through, or under them, attempted to secure possession of the said estate, contest the title of the Plaintiff and/or its predecessors in title or assert any interest,

adverse to that of the Plaintiff or its predecessors in title by any legal action or by formal acknowledgment thereof.

21. That the premises herein described in Paragraph 13 is the same premises that Plaintiff and his predecessors in title have been in open, continuous, notorious, hostile and uninterrupted possession for a period in excess of twenty-one (21) years, possession of the said premises having been acquired by the Plaintiff and its predecessors in title as hereinabove set forth.

22. It is believed and therefore averred that the said Plaintiff and his predecessors' title have throughout their occupancy on the said premises maintained the said premises and have further continued in actual uninterrupted exclusive, visible, notorious, distinct and hostile possession of these premises secured by their respective deeds and hereinbefore set forth.

23. The said Plaintiff, together with his predecessors in title have, commencing with the year 1972, and continuing up to the present time, made valuable improvements to the said premises, have maintained the same premises, paid all current real estate taxes, and have evidenced a settled intent of excluding all individuals from the use, actual occupation or constructive possession of premises.

24. At no time have any of the herein named Defendants, or their heirs, attempted to secure possession of the said premises, contest the title of the Plaintiff or its predecessors in title or assist in the maintenance, repair or improvement of those premises hereinbefore described nor has any asserted any interest adverse to the Plaintiff by any legal action.

WHEREFORE, Plaintiff files this action and respectfully request the following:

(a) That the Defendants, their heirs, administrators, executors, successors and assigns and all other persons having claim to the premises herein described be forever barred from asserting any right, title or interest in the land described herein inconsistent with the interest or title of Plaintiff unless the Defendants, their heirs, administrators, executors, successors or assigns, or those persons asserting any right, title or interest in said premises being an action of ejectment or other legal or equitable action to establish their claim to the premises described herein or any portion of the same, within the time set by the Court.

(b) That an Order of Court be made declaring the Plaintiff to be the sole owner and to have exclusive possession of the premises described herein by virtue of his open, uninterrupted and hostile possession of the premises for a period in excess of twenty-one (21) years.

(c) Such further Order as may be necessary for the granting of further relief.

By: 

David R. Thompson
Attorney for Plaintiff

VERIFICATION

Plaintiff verifies that the statements made in this **COMPLAINT** are true and correct.

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

DATE:

7-13-04

Robert E. Grossmer, Sr.
Robert E. Grossmer, Sr.

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

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No. 04-1097 -CD

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Type of Case:
Quiet Title Action

JADWIGA SLOGOSKA A/K/A JADINGA
SLAGOSKA, FRANK SLOGOSKI, JOSEPH
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Defendants

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TYPE OF PLEADING:
Motion for Service by Publication

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FILED ON BEHALF OF:
Plaintiff

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COUNSEL OF RECORD FOR THIS
PARTY:

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David R. Thompson, Esquire
308 Walton Street, St. 4
P.O. Box 587
Philipsburg PA 16866
(814) 342-4100
Supreme Court ID #73053

FILED

01/59/04
JUL 20 2004

William A. Shaw

Notary/Clerk of Courts

ICC Atty Thompson

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A
ROBERT GROSSMER,

Plaintiff

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04-1097-CD

vs.

* Type of Case: Action
to Quiet Title

JADWIGA SLAGOSKA, A/K/A JADINGA
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FILED

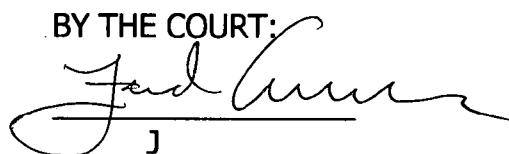
JUL 21 2004

William A. Shaw
Prothonotary/Clerk of Courts

ORDER OF COURT

AND NOW, this 21 day of July, 2004, upon consideration of Plaintiff's Motion for Service by Publication, including Exhibits and Affidavits attached hereto, Plaintiff is ordered and directed to serve Notice of the Action to Quiet Title by publication in The Progress and the Clearfield County Legal Journal, one time only, of notice of this action, in a form similar to that contained in "Exhibit B" of Plaintiff's Motion for Publication.

BY THE COURT:


J

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

MOTION FOR SERVICE BY PUBLICATION

AND NOW appears the Plaintiff, Robert E. Grossmer, Sr., a/k/a Robert Grossmer by and through his attorney, David R. Thompson, who represents as follows:

1. That he is the attorney for the Plaintiff in the above captioned action to Quiet Title.
2. That he is unable to ascertain the whereabouts of any of the named Defendants.

3. That he has executed an Affidavit stating that after diligent search he has been unable to ascertain the whereabouts of the Defendants or their heirs, devisees, administrators, executors, or assigns, said Affidavit being attached hereto as "Exhibit A".

4. Plaintiff has also been unable to locate the whereabouts of the Defendants.

5. That counsel for Plaintiff believes that the best means of service is by publication in a newspaper of general circulation in Clearfield County, in a form shown in "Exhibit B".

6. That the Plaintiff has exhausted all reasonable means of attempting to locate the Defendants, or their heirs, including inquiries of relatives, neighbors and friends, and local postal authorities and telephone books of the area.

WHEREFORE, Plaintiff requests your Honorable Court to permit the service of the original Complaint in this Action to Quiet Title by publishing a Notice similar in form to that of "Exhibit B" in the Progress and the Clearfield County Legal Journal, one time only, pursuant to Pa.R.C.P. 430 b(1).



David R. Thompson, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A
ROBERT GROSSMER,

Plaintiff

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* 04-
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vs.

* Type of Case: Action
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JADWIGA SLAGOSKA, A/K/A JADINGA
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their heirs, successors and assigns,
and all other persons known or unknown,
claiming any title by, under or through them,
their heirs, executors, administrators, and
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Defendants

*

AFFIDAVIT

Before me, a Notary Public, in and for the above named State and County,
personally appeared DAVID R. THOMPSON, ESQUIRE, who being duly sworn according to
law deposes and states that:

1. David R. Thompson, Esquire, is the attorney for the Plaintiff in the above
captioned Action to Quiet Title, licensed to practice in the Commonwealth of Pennsylvania.
2. As such, he has undertaken an investigation of the whereabouts of JADWIGA

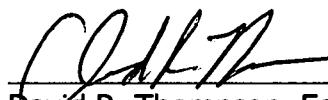
SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLAGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title the one time purported owner of a tract of land which is the subject matter of this Action to Quiet Title.

3. The information contained in this Affidavit was obtained from the Office of the Register of Wills and Recorder of Deeds and Office of Voter Registration of Centre County, Pennsylvania; the telephone directory for the Philipsburg area.

4. No Defendant has estates filed, and none has a telephone listing or voter registration in Centre County. There is no reasonable means of locating these defendants.

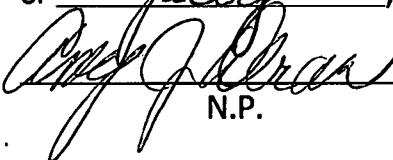
5. Further deponent saith not.

WHEREFORE, Plaintiffs request that your Honorable Court permit the service of the original Complaint in this Action to Quiet Title by publishing a Notice similar in form to that of Exhibit "B" in The Progress, The Centre Daily Times and the Centre County Legal Journal, one time only, pursuant to Pa.R.C.P. 403(b)(1).



David R. Thompson, Esquire

Sworn to and Subscribed to before
me a Notary Public this 13 day
of July, 2004.



N.P.

NOTARIAL SEAL
AMY J. DORAN, NOTARY PUBLIC
CHESTER HILL BORO., CLEARFIELD CO.
MY COMMISSION EXPIRES MAY 26, 2007

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A
ROBERT GROSSMER;

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* 04-

Plaintiff

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Type of Case: Action
to Quiet Title

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JADWIGA SLAGOSKA, A/K/A JADINGA
SLAGOSKA, FRANK SLOGOSKI, JOSEPH
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Defendants

TO: Heirs of Jadwiga Slagoska a/k/a Jadinga Slagoska, Frank Slogoski, Joseph Slagoska a/k/a Joseph Slogoski, Leo Slagoska, Frances Slagoska, Helen Slagoska, Bernice Slagoska, and ALL OTHER PERSON, persons, claiming any right, title or interest by or through them.

You are hereby notified that an Action to Quiet Title to premises situate in Osceola Mills Borough, Clearfield County, Pennsylvania, has been filed against you. Said lands are bounded and described as follows:

ALL that certain lot or piece of ground situated in the Borough of Osceola marked and designated on a certain plan of the Borough of No. 344 on the south side of Sarah Street at the distance of fifty feet westwardly from the west side of Elizabeth Street containing in front or breadth on the said Sarah Street fifty feet and extending of that width in length or depth southward one hundred and fifty feet, bounded on the North by Sarah Street on the east by Lot No. 343, on the South by Moshannon Alley and on the West by

the Lot No. 345.

NOTICE

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 an 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.

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Court Administrator
Clearfield County Courthouse.
Clearfield PA 16830
(814) 765-2641

You are hereby further notified to appear and answer the Complaint in said Action within twenty (20) days of this Notice, otherwise Judgment will be entered against you, barring you from all claims, rights and interests inconsistent with Plaintiff's claim of title, as set forth in the Complaint.

David R. Thompson, Esquire
P.O. Box 587
Philipsburg, PA 16866

ATTORNEYS FOR PLAINTIFF

PA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

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No. 04- 1097 -CD

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Type of Case:
Quiet Title Action

JADWIGA SLOGOSKA A/K/A JADINGA
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TYPE OF PLEADING:
Motion for Judgment

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FILED ON BEHALF OF:
Plaintiff

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COUNSEL OF RECORD FOR THIS
PARTY:

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David R. Thompson, Esquire
308 Walton Street, St. 4
P.O. Box 587
Philipsburg PA 16866
(814) 342-4100
Supreme Court ID #73053

FILED E&K
acc 9/14/04
OCT 01 2004
Atty Thompson

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

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No. 04-1097-CD

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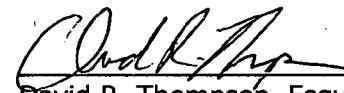
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AFFIDAVIT

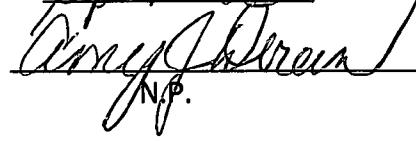
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

:ss:

Before me, the undersigned officer, in and for the above named State and County, personally appeared DAVID R. THOMPSON, ESQUIRE, who being duly sworn according to law deposes and says that a Notice of the Filing endorsed with a Notice to Plead, was duly served on the above named Defendants by publication in the Clearfield Progress on July 29, 2004, and The Clearfield County Legal Journal on August 6, 2004, with proof of publication attached hereto.


David R. Thompson, Esquire

SWORN to and subscribed
before me this 30 day
of September, 2004


Amy J. Doran
N.P.



PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

AUG 10 2004

COUNTY OF CLEARFIELD : :

On this 6th day of August AD 2004, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of this notice or advertisement published in said publication in the regular issues of Week of August 6, 2004, No. 32. And that all of the allegations of this statement as to the time, place, and character of the publication are true.



Gary A. Knaresboro, Esquire
Editor

Sworn and subscribed to before me the day and year aforesaid.

Sharon J. Pusey
Notary Public
My Commission Expires

NOTARIAL SEAL
SHARON J. PUSEY, Notary Public
Clearfield, Clearfield County, PA
My Commission Expires APRIL 7, 2007

David R Thompson
PO Box 587
Philipsburg PA 16866

by Sarah Street on the east by Lot No. 343, on the South by Moshannon Alley and on the West by the Lot No. 345.

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Court Administrator, Clearfield County Court House, Clearfield, PA 16830 (814) 765-2641.

You are hereby further notified to appear and answer the Complaint in said Action within twenty (20) days of this Notice, otherwise Judgment will be entered against you, barring you from all claims, rights and interests inconsistent with Plaintiff's claim of title, as set forth in the Complaint.

DAVID R. THOMPSON, ESQUIRE,
P.O. Box 587, Philipsburg, PA 16866.

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION

ROBERT E. GROSSMER, SR., A/K/A
ROBERT GROSSMER, Plaintiff vs.
JADWIGA SLAGOSKA, A/K/A JADINGA
SLAGOSKA, FRANK SLOGOSKI, JOSEPH
SLAGOSKA A/K/A JOSEPH SLOGOSKI,
LEO SLAGOSKA, FRANCES SLAGOSKA,
HELEN SLAGOSKA, BERNICE SLAGOSKA,
their heirs, successors and
assigns, and all other persons known or
unknown, claiming any title by, under or
through them, their heirs, executors,
administrators, and assigns, Defendants

ACTION TO QUIET TITLE

TO: Heirs of JADWIGA SLAGOSKA,
A/K/A JADINGA SLAGOSKA, FRANK
SLOGOSKI, JOSEPH SLAGOSKA A/K/A
JOSEPH SLOGOSKI, LEO SLAGOSKA,
FRANCES SLAGOSKA, HELEN SLAGOSKA,
BERNICE SLAGOSKA, and ALL
OTHER PERSON, persons, claiming any
right, title or interest by or through them.

You are hereby notified that an Action to
Quiet Title to premises situate in Osceola
Mills Borough, Clearfield County, Penn-
sylvania, has been filed against you. Said
lands are bounded and described as follows:

ALL that certain lot or piece of ground
situated in the Borough of Osceola marked
and designated on a certain plan of the
Borough of No. 344 on the south side of
Sarah Street at the distance of fifty feet
westwardly from the west side of Elizabeth
Street containing in front or breadth on the
said Sarah Street fifty feet and extending of
that width in length or depth southward one
hundred and fifty feet, bounded on the North

IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY, PA
CIVIL ACTION-LAW

04-

Type of Case: Action

to Quiet Title

ROBERT E. GROSSMER, SR.,
A/K/A ROBERT GROSSMER,

Plaintiff

vs.

JADWIGA SLAGOSKA, A/K/A JADWIGA SLAGOSKA, FRANK SLODINGA SLAGOSKA, JOSEPH SLAGOSKA, GOSKI, JOSEPH SLAGOSKA, A/K/A JOSEPH SLAGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLAGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators, and assigns;

Defendants

TO: Heirs of Jadwiga Slagoska, a/k/a Jadwiga Slagoska, Frank Slagowski, Joseph Slagowski, a/k/a Joseph Slagowski, Leo Slagowski, Frances Slagowski, Helen Slagowski, Bernice Slagowski, and ALL OTHER PERSON, persons, claiming any right, title or interest by or through them.

You are hereby notified that an Action to Quiet Title to premises situated in Osceola Mills Borough, Clearfield County, Pennsylvania, has been filed against you. Said lands are bounded and described as follows:

ALL that certain lot or piece of ground situated in the Borough of Osceola marked and designated on a certain plan of the Borough of No. 344 on the south side of Sarah Street at the distance of fifty feet

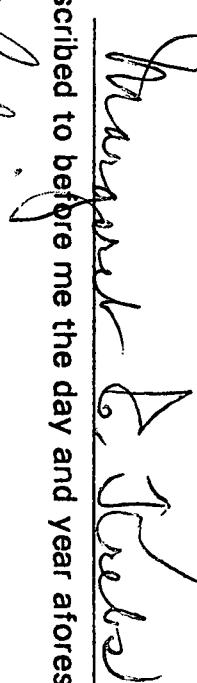
westwardly from the west side of Elizabeth Street containing in front

STATE OF PENNSYLVANIA : SS: AUG 30 2004
COUNTY OF CLEARFIELD : :

On this 27th day of August, A.D. 2004, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of July 29, 2004. And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.

Sworn and subscribed to before me the day and year aforesaid.



Cheryl J. Robison
Notary Public, Clearfield, Pa.
My Commission Expires
October 31, 2007

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cheryl J. Robison, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Oct. 31, 2007

Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

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No. 04-1097-CD

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Defendants

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MOTION FOR JUDGMENT

AND NOW this 1st day of October, 2004, an Affidavit having been executed and filed on behalf of Plaintiff that the Complaint endorsed with Notice to Plead had been served on the Defendant as stated in the Affidavit; and more than twenty (20) days have expired since the date of service and the Defendant not having answered, the Plaintiff, by their attorney, David R. Thompson, Esquire, moves the Court to enter judgment in favor of the Plaintiff and against the Defendant and to grant Plaintiff the relief prayed for in the Complaint in accordance with Pennsylvania Rules of Civil Procedure No. 1066.



David R. Thompson
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

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No. 04-1097-CD

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JADWIGA SLOGOSKA A/K/A JADINGA
SLAGOSKA, FRANK SLOGOSKI, JOSEPH
SLAGOSKA A/K/A JOSEPH SLOGOSKI,
LEO SLAGOSKA, FRANCES SLAGOSKA,
HELEN SLAGOSKA, BERNICE SLAGOSKA,
their heirs, successors and assigns,
and all other persons known or unknown,
claiming any title by, under or through them,
their heirs, executors, administrators, and
assigns,

Defendants

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FILED ^{E6K}
OCT 05 2004 ^{Att'y}
William A. Shaw
Prothonotary/Clerk of Courts

ORDER

AND, NOW this 5 day of October, 2004, it appearing that a Complaint
to Quiet Title in the above stated action was served by publication on the Defendants, JADWIGA
SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH
SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLOGOSKA, BERNICE SLAGOSKA, their
heirs, successors and assigns, and all other persons known or unknown, claiming any title by,
under or through them, their heirs, executors, administrators and assigns, in interest and by
Affidavit of David R. Thompson, Esquire, Attorney for Plaintiff, no Answer has been filed in said
Action on behalf of the said Defendant, and on motion of David R. Thompson, Esquire, Attorney
for Plaintiff, it is hereby ORDERED AND DECREED:

1. That the said Defendants, A JADWIGA SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK
SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA,
HELEN SLOGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons

known or unknown, claiming any title by, under or through them, their heirs, executors, administrators and assigns, and all other persons, firms, partnerships or corporate entities in interest are forever barred from asserting any right, title, lien or interest inconsistent with the interest or claim of the Plaintiff as set forth in its Complaint in and to ALL that certain piece or parcel of land situate in Osceola Mills Borough, Clearfield County, Pennsylvania, and more particularly set forth in Exhibit "A", attached hereto and made a part hereof.

Said ORDER to be final and absolute unless the Defendants, JADWIGA SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLOGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators and assigns, and all other persons, firms, partnerships or corporate entities in interest shall file exceptions thereto within thirty (30) days.

2. That if the said Defendants, JADWIGA SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLOGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators and assigns and all other persons, firms, partnerships or corporate entities in interest have not filed said exceptions within thirty (30) days, the Prothonotary shall enter Final Judgment upon Praecept of the Plaintiff.

3. That the rights of the Plaintiff are superior to the rights of the Defendant, JADWIGA SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLOGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators and assigns, and ALL OTHER

PERSONS, firms, partnerships or corporate entities in interest.

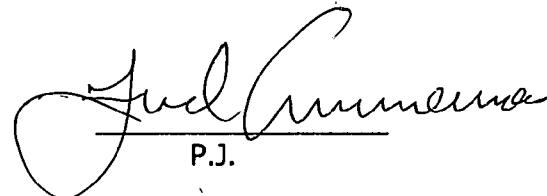
4. That the said Plaintiff has title fee simple to the premises as described in the Complaint as against the Defendants, JADWIGA SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLOGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators and assigns, and ALL OTHER PERSONS, firms, partnerships or corporate entities in interest.

5. That the Defendants, JADWIGA SLOGOSKA A/K/A JADINGA SLAGOSKA, FRANK SLOGOSKI, JOSEPH SLAGOSKA A/K/A JOSEPH SLOGOSKI, LEO SLAGOSKA, FRANCES SLAGOSKA, HELEN SLOGOSKA, BERNICE SLAGOSKA, their heirs, successors and assigns, and all other persons known or unknown, claiming any title by, under or through them, their heirs, executors, administrators and assigns, and ALL OTHER PERSONS, firms, partnerships or corporate entities in interest are enjoined from setting up title to the premises of the Plaintiff, described in said Complaint and from impeaching, denying or in any way attacking the title of the Plaintiff to said premises.

6. That these proceedings or an authenticated copy thereof, shall at all times hereafter be taken as evidence of the facts declared and established hereby.

7. That a certified copy of this Order shall be recorded in the Office of the Recorder of Deeds of Clearfield County, Pennsylvania.

BY THE COURT:



P.J.

EXHIBIT "A"

ALL that certain lot or piece of ground situated in the Borough of Osceola Mills and designated on a certain plan of the Borough as No. 344 on the south side of Sarah Street at a distance of fifty feet westwardly from the west side of Elizabeth street containing in front or breadth on the said Sarah Street fifty feet and extending of that width in length or depth southward one hundred and fifty feet, bounded on the North by Sarah Street on the east by Lot No. 343, on the South by Moshannon Alley and on the West by the Lot No. 345.

BEING further identified as Clearfield County Tax Map No.13-381-2 as shown on the assessment map in the records of Clearfield County, PA.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff * No. 04-1097-CD

vs.

JADWIGA SLOGOSKA A/K/A JADINGA
SLAGOSKA, FRANK SLOGOSKI, JOSEPH
SLAGOSKA A/K/A JOSEPH SLOGOSKI,
LEO SLAGOSKA, FRANCES SLAGOSKA,
HELEN SLAGOSKA, BERNICE SLAGOSKA,
their heirs, successors and assigns,
and all other persons known or unknown,
claiming any title by, under or through them,
their heirs, executors, administrators, and
assigns,

Defendants *

* TYPE OF CASE:
Quiet Title Action

* TYPE OF PLEADING:
Praecipe for Final Judgment

* FILED ON BEHALF OF:
Plaintiffs

* COUNSEL OF RECORD FOR
THIS PARTY:
* David R. Thompson, Esquire
* Attorney at Law
* Supreme Court I.D. 73053
* P.O. Box 587
* 308 Walton Street, Suite 4
* Philipsburg PA 16866
* (814) 342-4100

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William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.
CIVIL ACTION - LAW

ROBERT E. GROSSMER, SR. A/K/A ROBERT
GROSSMER,

Plaintiff

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No. 04-1097-CD

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