

04-1595-CD
LAWRENCE F. HIRCHAK, etal. vs. PATRICK DUGAN, etal.

Lawrence Hirschak et al vs Patrick Dugan et
2004-1595-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,

Defendants

: No.: 2004-1595-CD
:
: Type of Case: Quiet
: Title Action
: Type of Pleading:
: Final Order of Court
: Filed on behalf of:
: Plaintiffs
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED

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William A. Shaw
Prothonotary
1 Cent to Attys

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |

SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

FINAL ORDER OF COURT

NOW, this 20th day of April, 2005, upon Motion for Final Judgment by Plaintiff, wherein Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan, being the only Defendant to enter appearance having filed a Praecipe to Settle and Discontinue and wherein by Orders dated January 18, 2005 and February 10, 2005 judgment having been entered against all other Defendants;

IT IS ORDERED AND DECREED that Final Judgment is hereby entered against all Defendants and it is hereby Ordered and Decreed that title to the land subject of this action is vested absolutely in the Plaintiffs, their heirs and assigns, free and clear of any and all claims of any nature by the named Defendants, their heirs, executors, administrators, trustees, successors and assigns or by anyone claiming by, through or under them or any of them, and that the Plaintiffs are seized of an indefeasible title to all those certain three (3) lots situate in Houtzdale Borough, Clearfield County, Pennsylvania, bounded and described as follows:

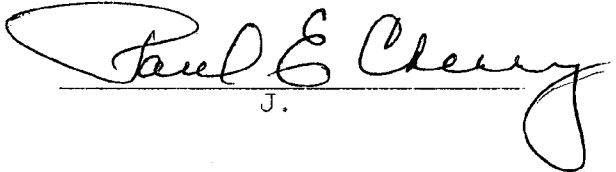
BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35.

BY THE COURT,


J.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs : Type of Case: Quiet
 : Title Action
vs. : Type of Pleading:
 : Praecept to Settle
 : and Discontinue
PATRICK DUGAN AND MARY DUGAN : Filed on behalf of:
a/k/a MARY M. DUGAN, his wife; : Plaintiffs
KATE DUGAN a/k/a KATHRYN D. : Counsel of Record For
YUON; ANATASIA DUGAN a/k/a : This Party:
ANNA G. FITZGERALD; EDWARD L. : Girard Kasubick, Esq.
DUGAN; GERALD DUGAN; WILLIAM : Supreme Court #30109
DUGAN; MARY CORNYN; BERTHA : LEHMAN & KASUBICK
SMITH; AURELIA VOGEL a/k/a : 611 Brisbin Street
AURELIA VOGLE; JAMES DUGAN; : Houtzdale, PA 16651
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
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DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :

FILED ^{cc}
d/12:53.81
APR 19 2005

William A. Shaw
Prothonotary/Clerk of Courts

TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
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trustees and assigns, known :
or unknown and any other :
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Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
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SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
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or unknown and any other :
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the property subject to this :
action, :
Defendants :

PRAECIPE TO SETTLE AND DISCONTINUE

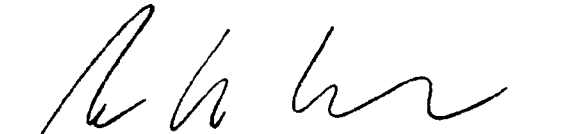
TO: William A. Shaw, Prothonotary:

Please mark the above-captioned case settled and discontinued and ended as to the Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan.

Dated: 04/13/2005


Girard Kasubick, Esq.,
Attorney for Plaintiffs

Dated: 04/15/2005


George W. Westervelt, Jr., Esq.
Attorney for Patricia Dugan
Smith a/k/a Patricia Ann Dugan

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs : Type of Case: Quiet
vs. : Title Action
: Type of Pleading:
: Motion for Final
: Judgment
PATRICK DUGAN AND MARY DUGAN : Filed on behalf of:
a/k/a MARY M. DUGAN, his wife; : Plaintiffs
KATE DUGAN a/k/a KATHRYN D. : Counsel of Record For
YUON; ANATASIA DUGAN a/k/a : This Party:
ANNA G. FITZGERALD; EDWARD L. : Girard Kasubick, Esq.
DUGAN; GERALD DUGAN; WILLIAM : Supreme Court #30109
DUGAN; MARY CORNYN; BERTHA : LEHMAN & KASUBICK
SMITH; AURELIA VOGEL a/k/a : 611 Brisbin Street
AURELIA VOGLE; JAMES DUGAN; : Houtzdale, PA 16651
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
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MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :

FILED (K)
125384 No
APR 19 2005 cc

William A. Shaw
Prothonotary/Clerk of Courts

TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
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Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
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YUON; ANATASIA DUGAN a/k/a :
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a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
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the property subject to this :
action, :
Defendants :

MOTION FOR FINAL JUDGMENT

NOW, this _____ day of April, 2005, the court having entered Orders dated January 18, 2005 and February 10, 2005 against all Defendants except Patricia Dugan Smith a/k/a Patricia Ann Dugan ordering that title to the land subject of this action is vested absolutely in the Plaintiffs and that the thirty (30) days to file an Action in Ejectment have elapsed under both Orders with no Ejectment Action being filed.

Furthermore a Praecipe To Settle and Discontinue is filed with this Motion on behalf of Patricia Dugan Smith a/k/a Patricia Ann Dugan thereby resolving all matters pending against the final Defendant, namely Patricia Dugan Smith a/k/a Patricia Ann Dugan.

WHEREFORE, Girard Kasubick, Esq., prays your Honorable Court, as attorney for the Plaintiffs, that final judgment be entered in favor of the Plaintiffs and against all the Defendants forever barring them from asserting any title or claim to the real property subject of this action.


Girard Kasubick, Esq.,
Attorney for Plaintiffs

VERIFICATION

I verify that the statements made in the foregoing Motion for Final Judgment are true and correct and that false statements made herein are subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.


Girard Kasubick, Esq.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs : QUIET TITLE ACTION

vs. :

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
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WILLIAM DUGAN; ROSE McCAMLEY; :
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BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
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DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
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MARK DUGAN; TRACY ANN HURTACK; :
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heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

CERTIFICATE OF SERVICE

I hereby certify that I, Girard Kasubick, Esq., served a copy of the Motion for Final Judgment by regular United States mail, postage pre-paid, mailed on April 13, 2005 upon the attorney for the Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan, who is the only party who has entered an appearance, at the following address:

George W. Westervelt, Jr., Esq.
706 Monroe Street
P.O. Box 549
Stroudsburg, PA 18360-0549

Girard Kasubick, Esquire,
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN and
MARY DUGAN a/k/a MARY M.
DUGAN, his wife;

KATE DUGAN ²a/k/a KATHRYN D.
YUON;

ANATASIA DUGAN ⁴a/k/a ANNA
G. FITZGERALD;

EDWARD L. DUGAN; ⁵

GERALD DUGAN; ⁶

WILLIAM DUGAN; ⁷

MARY CORNYN; ⁸

BERTHA SMITH; ⁹

AURELIA VOGEL ¹⁰
a/k/a AURELIA VOGLE;

JAMES DUGAN; ¹¹

JOSEPH DUGAN; ¹²

PATRICK DUGAN ¹³a/k/a
PATRICK C. DUGAN;

CATHERINE WADE; ¹⁴

PATRICK C. DUGAN a/k/a ¹⁵
PATRICK C. DUGAN, JR.;

SOPHIA POORMAN; ¹⁶

MARY SUTTON; ¹⁷

JULIA WARRICK ¹⁸
a/k/a JULIETTE WARRICK;

: No.: 2004-1595 -CD
: Type of Case:
: Quite Title Action
: Type of Pleading:
: Complaint
: Filed on behalf of:
: Plaintiffs
: Counsel Of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: 611 Brisbin Street
: Houtzdale, PA 16651

12-20-2004 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Will. A. Shaw
Deputy Prothonotary

FILED 23 cc
18-43201 Atty Kasubick
OCT 14 2004 Atty pd. 95.00
William A. Shaw
Prothonotary/Clerk of Courts

Nov. 15, 2004 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Will. A. Shaw
Deputy Prothonotary

JOHN DUGAN; 19
JEROME DUGAN; 20
WILLIAM DUGAN; 21
ROSE McCAMLEY; 22
RUTH FLAIG; 23
HANEY DUGAN; 24
RITA EVANOCHKO; 25
MARGARET LAWS; 26
HELEN DUGAN; 27
SARA LENORE DUGAN; 28
PATRICIA WADE LOBB; 29
CHARLES "CHUCK" DUGAN; 30
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ALICE FAYE HEVERLY; 32
REBECCA POORMAN; 33
ELOISE HILE; 34
MARY OSWALT; 35
MARJORIE KAUFMAN; 36
ROBERT SUTTON; 37
JAMES J. DUGAN; 38
PATRICK DUGAN 39
a/k/a PATRICK DUGAN, III;
THOMAS DUGAN; 40
MARY RUTH CARNEY; 41
SUE ANN BOTTINGER; 42
PAUL DUGAN; 43

JOHN DUGAN; ⁴⁸ :
LAWRENCE DUGAN; ⁴⁸ :
KATHLEEN DUGAN; ⁴⁸ :
MICHAEL DUGAN; ⁴⁸ :
LINDA DUGAN KITKO; ⁴⁸ :
DANIEL DUGAN; ⁴⁸ :
PATRICIA DUGAN SMITH ⁴⁸ :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; ⁴⁸ :
MATTHEW DUGAN; ⁴⁸ :
MARK DUGAN; ⁴⁸ :
TRACY ANN HURTACK; ⁴⁸ :
SCOTT MICHAEL DUGAN; ⁴⁸ :
and their heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title :
in the property subject to :
this action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004- -CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :

administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
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 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 Plaintiffs. 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.

David S. Meholick
Court Administrator's Office
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-- --CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :

administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

COMPLAINT

AND NOW comes LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife, by and through their attorney, Girard Kasubick, Esq., and files the following Complaint:

1. The Plaintiffs are Lawrence E. Hirschak and Gwen A. Hirschak, who resides at 893 Hidden Hollow Drive, Gap, Pennsylvania 17527.

2. The Defendants, Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan; and their heirs, executors, administrators, successors, trustees and

assigns, known or unknown, and any other person who may claim title under them, and who are deceased or their whereabouts are unknown.

3. The Defendant, Jerome Dugan, resides at 323 Belaire Drive, Shiremanstown, PA 17011.

4. The Defendant, Rita Evanochko, resides at 47 Collins Road, Trenton, New Jersey 08619.

5. The Defendant, Margaret Laws, resides at 1726 Black Moshannon Road, Philipsburg, PA 16866.

6. The Defendant, Helen Dugan, resides 312 Seventeenth Street, Tyrone, PA 16686.

7. The Defendant, Sara Lenore Dugan, resides at 272 Juniata Street, Houtzdale, PA 16651.

8. The Defendant, Patricia Wade Lobb, resides at 905 Don Street, Houtzdale, PA 16651.

9. The Defendant, Charles "Chuck" Dugan, resides at 601 Bluestone Drive, Allison Park, PA 15101.

10. The Defendant, Muriel Dugan Newcombe, resides at 272 Juniata Street, Houtzdale, PA 16651.

11. The Defendant, Mary Oswalt, resides at 1201 Madison Avenue, Altoona, PA 16602.

12. The Defendant, Marjorie Kaufman, resides at 133 Oak Ridge Road, Lewistown, PA 17044.

13. The Defendant, Robert Sutton, resides at 432 South Randolph Street, Macomb, IL 61455.

14. The Defendant, John Dugan, resides at 179 Brahman Avenue, Bridgewater, NJ 08807.

15. The Defendant, Lawrence Dugan, resides at 70 Hemlock Street, Houtzdale, PA 16651.

16. The Defendant, Kathleen Dugan, resides at 108 Newman Road, Scotia, NY 12302.

17. The Defendant, Michael Dugan, resides at P.O. Box 401, Madera, PA 16661.

18. The Defendant, Linda Dugan Kitko, resides at 201 Brisbin Street, Houtzdale, PA 16651.

19. The Defendant, Daniel Dugan, resides at 7140 Decoy Drive, Owings, MD 20736.

20. The Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan, resides at 16 Spring Lake Drive, East Stroudsburg, PA 18301.

21. The Defendant, Teresa Dugan, resides at P.O. Box 118, Brisbin, PA 16620.

22. The Defendant, Matthew Dugan, resides at P.O. Box 36, Morann, PA 16663.

23. The Defendant, Mark Dugan, resides at Box 215, 3406 Ginter-Morann Highway, Morann, PA 16663.

24. The Defendant, Tracy Ann Hurtack, resides at 603 Curtin Street, Osceola Mills, PA 16666.

25. The Defendant, Scott Michael Dugan, resides at 717 Curve Street, Philipsburg, PA 16866.

26. The real property involved in and subject to

this action is all that certain piece or parcel of land containing three (3) lots situate in Houtzdale Borough, Clearfield County, Pennsylvania, bounded and described as follows:

BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35. The above property hereinafter referred to as "Premises".

27. The deeds and method by which Lawrence E. Hirschak and Gwen A. Hirschak, his wife, obtained title to the real properties described in Paragraph 26 of this Complaint is as follows:

a). The Premises was conveyed to Lawrence E. Hirschak and Gwen A. Hirschak, his wife, by deed from Lawrence E. Hirschak dated October 7, 1989, and recorded in Clearfield County Deeds and Records Book 1307, Page 318. The deed contained only the boulder description in Paragraph 26 above.

b). The Premises was conveyed to Lawrence E. Hirschak by deed from Sara L. Dugan, single, dated September 10, 1979 and recorded in Clearfield County Deed Book 789, Page 62. This deed contained only the boulder description in Paragraph 26 above.

c). The Premises was conveyed to Sara L. Dugan by deed from Sara Dugan, widow, dated May 15, 1965 and recorded in Clearfield County Deed Book 514, Page 555. This deed states this is a parent to child conveyance. This deed contained only the boulder description in Paragraph 26 above, except the North boulder is said to be Deer Alley not Bear Alley. It is averred Deer Alley is incorrect in this description.

d). The Premises was conveyed to Sara Dugan by deed from William U. Smith and Terry C. Smith, his wife, dated September 22, 1960 and recorded in Clearfield County Deed Book 485, Page 519. This deed contained only the boulder description in Paragraph 26 above, except the North boulder is said to be Deer Alley not Bear Alley. It is averred Deer Alley is incorrect in this description.

e). The Premises was conveyed to William U. Smith by deed from R. Curtis Smith, Treasurer of Clearfield County in the name of the Mary Dugan Estate, dated May 11, 1959 and recorded in Clearfield County Deed Book 485, Page 515. This deed contained only the boulder

description in Paragraph 26 above, except the North bounder is said to be Deer Alley not Bear Alley. It is averred Deer Alley is incorrect in this description.

f). The three (3) lots conveyed in Clearfield County Deed Book 485, Page 515 above were sold for non-payment of 1956 taxes and notes the property was assessed to the Mary Dugan Estate. This Treasurers Tax Sale was confirmed by Order of Court dated March 10, 1959 found in Court of Common Pleas of Clearfield County File No. 235 November Term 1958 in Clearfield County Prothonotary Docket No. 168, Page 271.

g). After diligent search of the records of the Records Office of Clearfield County no recorded deed was found into Mary Dugan for the Premises subject of this action.

h). The assessment records of Houtzdale Borough, Clearfield County shows the Mary Dugan Estate assessed with various tracts of land from 1926 to 1960. Only one of these assessments is 3L or 3 Lots. On various years assessment records between 1945 and 1959 the 3L are listed as bounded on North by Deer Alley, South by Clara Street, East by Harry Street and West by Alley. Deer Alley is again incorrect. Also some of these years assessments records give a deed reference on these 3L as Deed Book 159, page 137 as in subparagraph i). below.

i). The Premises subject of this action was conveyed to Patrick Dugan by deed from the heirs of Daniel Houtz dated July 6, 1891 and recorded in Deed Book 159, Page 137. The description in this deed is the second description described in Paragraph 26. above. It does describe Bear Alley to the North and not Deer Alley as is incorrectly stated in part of this chain of title.

j). The assessment records of Houtzdale Borough, Clearfield County shows Mary Dugan rather than Mary Dugan Estate assessed with the 3L in 1925.

k). The assessment records of Houtzdale Borough, Clearfield County shows Mary Dugan assessed with a L or lot from 1909 to 1924 and then in 1925 this L is changed to 3L.

l). The assessment records of Houtzdale Borough, Clearfield County shows in 1909 that the L assessed to Mary Dugan is from Patk Dugan which is averred to be Patrick Dugan.

m). The assessment records of Houtzdale Borough, Clearfield County shows Patrick Dugan assessed with various tracts between 1888 and 1907. One assessment is listed as Plot #527 on Harry and Clara Street that was the only tract assessed to him in 1907. There is no assessment to Patrick Dugan after 1907.

n). The Plan of Houtzdale Borough on file in the Clearfield County Assessment Office shows no Lot or

Plot No. 527 on Harry Street. The Plan does show Lots 524, 525, and 526 on Harry Street South of Clara Street, but the lots on Harry Street, North of Clara Street being the subject Premises, are lots 907, 908, and 909 on said Plan.

o). It is averred that the deed to Patrick Dugan in subparagraph i). above is the same as the Lot or Plot assessed as No. 527 to Patrick Dugan which was transferred to Mary Dugan on assessment records in 1909 and which became the 3L assessed to Mary Dugan and Mary Dugan Estate in 1925 and 1926.

p). After diligent search of the records of the Records Office of Clearfield County, no recorded deed was found where Patrick Dugan conveyed out the Premises described in Deed Book 159, Page 137 set forth in subparagraph i). above to Mary Dugan or any other person or entity.

q). It is believed and averred that Mary Dugan was the wife of Patrick Dugan and Clearfield County records show Patrick Dugan and Clearfield County Records show Patrick Dugan married Mary Glynn on January 16, 1890 in Marriage Docket 7, Page 2252.

r). After diligent search of the records of Register of Wills office of Clearfield County, no estate could be found on Patrick Dugan except for the Estate of Patrick C. Dugan who died July 8, 1947, as set

forth below in subparagraph bb). which is believed to be the son of the Patrick Dugan in Deed Book 159, Page 137.

s). It is averred Mary Dugan a/k/a Mary M. Dugan and wife of Patrick Dugan died on July 16, 1925 and her estate is found in the Register of Wills office of Clearfield County in Estate File No. 10094.

t). The estate of Mary Dugan a/k/a Mary M. Dugan shows she had eleven (11) children, namely; Kate Dugan, Anatasia Dugan, Edward L. Dugan, Gerald Dugan, William Dugan, Mary Cornyn, Bertha Smith, Mrs. William Vogel, James Dugan, Joseph Dugan, and Patrick Dugan. Kate Dugan married and her married name was Kathryn D. Yuon. Anatasia Dugan married and her married name was Anna G. Fitzgerald. Mrs. William Vogel was also known as Aurelia Vogel a/k/a Aurelia Vogle. Patrick Dugan was also known as Patrick C. Dugan who was the son of Patrick Dugan.

u). The estate of Mary Dugan a/k/a Mary M. Dugan, by her will in Will Book N, Page 178 devised various tracts of real property and the premises subject of this action appear to be Stone Quarry lots and/or the 3 Lots near German Lutheran Church to her son, Gerald Dugan.

v). After diligent search of the records of the Recorders Office and Register of Wills Office of Clearfield County no deed out of Mary Dugan or Mary Dugan Estate or into Gerald Dugan for the premises was found nor

is there an accounting in the estate of Mary Dugan a/k/a Mary M. Dugan distributing the premises to Gerald Dugan.

w). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Gerald Dugan, William Dugan, Mary Cornyn, Bertha Smith, James Dugan or Joseph Dugan, six (6) of the eleven (11) children of Patrick Dugan and Mary Dugan.

x). It is averred that Kate Dugan, one of the eleven (11), married and was known as Kate Dugan Yuon or Kathryn Dugan Yuon and she died May 19, 1972 as shown by Clearfield County Estate File No. 72-286, and by her Will in Will Book 19, Page 148 she devised her estate to nieces, Sara Lenore Dugan and Helen Dugan.

y). It is averred that Antasia Dugan, one of the eleven (11), married and was known as Anna Dugan Fitzgerald or Anatasia Dugan Fitzgerald and she died on May 20, 1966 as shown by Clearfield County Estate File No. 26543 and by her Will in Will Book 11, Page 275 she devised all her property to her two sisters, Kathryn Dugan Yuon and Aurelia Dugan Vogle.

z). Edward L. Dugan, one of the eleven (11), died March 23, 1957. As shown by Clearfield County Estate File No. 23014 and by his Will in Will Book 3, Page 299, he devises his real property as part of his residue to his Executor, William G. Dugan and Executrix, Kathryn

Dugan Yuon to distribute at their discretion, but his intestate heirs would be his siblings.

aa). Mrs. William Vogel, one of the eleven (11), also known as Aurelia Dugan Vogel and Aurilia Dugan Vogle, and she died on February 16, 1976 as shown by Clearfield County Estate File No. 76-93, and by her Will in Will Book 29, Page 495 she devised her residue to Patricia Wade, Charles "Chuck" Dugan, Helen Dugan, and Muriel Dugan Newcombe.

bb). Patrick C. Dugan, one of the eleven (11), died July 8, 1947 as shown by Clearfield County Estate File No. 19695 and by his holographic Will there is no mention of any interest in the property subject of this action nor is there any residue clause, but his heirs in the petition for letter is listed as his fourteen (14) children namely; Catherine Wade, Patrick C. Dugan, Jr., Sophia Poorman, Mary Sutton, Julia Warrick, John Dugan, Jerome Dugan, William Dugan, Rose McCamley, Ruth Flaig, Haney Dugan, Rita Evanochko, Margaret Laws, and Helen Dugan.

cc). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Sara Lenore Dugan and Helen Dugan, heirs of Kate Dugan Yuon a/k/a Kathryn Dugan Yuon.

dd). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Patricia Wade, Charles "Chuck" Dugan, Helen Dugan and Muriel Dugan Newcombe heirs of Mrs. William Vogel a/k/a Aurelia Dugan Vogel a/k/a Aurilia Dugan Vogle.

ee). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Catherine Wade, Patrick C. Dugan, Jr., Mary Sutton, Julia Warrick, John Dugan, Jerome Dugan, William Dugan, Rose McCamley, Ruth Flaig, Haney Dugan, Rita Evanochko, Margaret Laws and Helen Dugan, thirteen (13) of the fourteen (14) of Patrick Dugan, son of Patrick Dugan and Mary Dugan in subparagraph bb). above.

ff). Sophia Poorman, one of the fourteen (14) heirs of Patrick Dugan died on May 21, 1992 as shown by Clearfield County Estate File No. 1990-392 and by her Will in Will Book 74, Page 288 she devised a percent of her estate to sixteen (16) different heirs, some siblings, some nieces and nephews and some of whom died before Sophia whose issue were devised their share. In all, there were thirty (30) heirs listed as follows:

Catherine D. Wade, Margaret D. Laws, Juliette Warrick, Rose McCamley, Patricia Lou Lobb, Rita Evanochko, Helen Dugan, Jerome Dugan, Alice Faye Heverly, Rebecca Poorman,

Eloise Hile, Mary Oswalt, Marjorie Kaufman, Robert Sutton (issue of Mary Sutton), James J. Dugan (issue of Patrick Dugan), Patrick Dugan (issue of Patrick Dugan), Thomas Dugan (issue of Patrick Dugan), Mary Ruth Carney(issue of Patrick Dugan), Sue Ann Bottinger (issue of Patrick Dugan), all of the remaining names below being issue of Haney Dugan, namely, Paul Dugan, John Dugan, Lawrence Dugan, Kathleen Dugan, Michael Dugan, Linda Dugan Kitko, Daniel Dugan, Patricia Dugan Smith, Teresa Dugan, Matthew Dugan, Mark Dugan.

gg). After diligent search of the records of the Register of Wills Office of Clearfield County, no estates could be found on any of the thirty (30) names in subparagraph ff). above except for Paul Dugan (issue of Haney Dugan), who died on September 17, 2001 and his estate is filed in Clearfield County Estate File No. 2001-720 and the records in the estate show he had two children as heirs being Tracy Ann Hurtack and Scott Michael Dugan.

28. The Plaintiffs and their predecessors in title have been in open, continuous, notorious, actual, exclusive, visible, distinct and hostile possession of the premises described in Paragraph 26 of this Complaint in excess of twenty-one (21) years immediately preceding the filing of this Action, and thereby claim title by adverse possession.

29. The Plaintiffs have constructed a house on the premises which has been there for more than 21 years and they have mowed grass, landscaped, and maintained the premises and lived on the premises for more than 21 years.

30. This Quiet Title Action is also necessary to establish a proper chain of title out of which the real property subject of this action comes, because of irregularities in the chain of title, including possible unrecorded deeds, variances in the descriptions, tax sale deeds, unclear tax assessments, quit-claim deeds, and possible double chain of title, no proof of deaths or estates of record proving heirs, all of which raise a question as to the chain of title to the property and create a cloud on title.

31. It is finally averred that this Quiet Title Action is necessary to determine the validity or discharge of any document, obligation, assessment or deed affecting any right, title and interest in the property subject of this action, which may affect the rights of the Defendants and their heirs.

32. The Defendants to this Action namely; Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a

29. The Plaintiffs have constructed a house on the premises which has been there for more than 21 years and they have mowed grass, landscaped, and maintained the premises and lived on the premises for more than 21 years.

30. This Quiet Title Action is also necessary to establish a proper chain of title out of which the real property subject of this action comes, because of irregularities in the chain of title, including possible unrecorded deeds, variances in the descriptions, tax sale deeds, unclear tax assessments, quit-claim deeds, and possible double chain of title, no proof of deaths or estates of record proving heirs, all of which raise a question as to the chain of title to the property and create a cloud on title.

31. It is finally averred that this Quiet Title Action is necessary to determine the validity or discharge of any document, obligation, assessment or deed affecting any right, title and interest in the property subject of this action, which may affect the rights of the Defendants and their heirs.

32. The Defendants to this Action namely; Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a

Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan; are deceased or their whereabouts are unknown and Plaintiffs have made a diligent and reasonable search to locate the whereabouts of the Defendants, but they are deceased or their whereabouts are unknown.

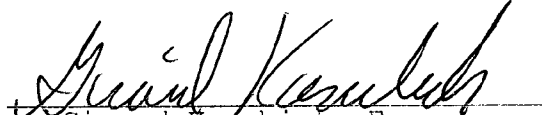
WHEREFORE, Plaintiffs bring this action and respectfully requests the Court to decree as follows:

a). That the Plaintiffs, their heirs, executors, personal representatives and assigns are seized of an indefeasible title to the property situated in Houtzdale Borough, Clearfield County, Pennsylvania, described herein and that an Order and Decree be entered adjudicating that each of the Defendants and any of their heirs, successors, trustees, personal representatives, or assigns be forever barred from asserting any right, title, lien or interest in the within described parcel of land.

b). That such other relief be granted as may be necessary in establishing Plaintiffs' title, including determinations on the validity or discharge of any

documents, obligations or deeds affecting right, title and interest in the property described herein.

c). Such other and further relief as the Court deems proper.


Girard Kasubick, Esq.
Attorney for Plaintiffs

VERIFICATION

We, the undersigned, verify that the statements made in the foregoing Complaint are true and correct. We understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. 4904 relating to unsworn falsification to authorities.


Lawrence E. Hirschak


Gwen A. Hirschak

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595 -CD
GWEN A. HIRCHAK, his wife, : Type of Case:
Plaintiffs : Quiet Title Action
vs. : Type of Pleading:
: Motion For Service
: By Publication
PATRICK DUGAN AND MARY DUGAN : Filed on behalf of:
a/k/a MARY M. DUGAN, his wife; : Plaintiffs
KATE DUGAN a/k/a KATHRYN D. : Counsel Of Record For
YUON; ANATASIA DUGAN a/k/a : This Party:
ANNA G. FITZGERALD; EDWARD L. : Girard Kasubick, Esq.
DUGAN; GERALD DUGAN; WILLIAM : Supreme Court #30109
DUGAN; MARY CORNYN; BERTHA : 611 Brisbin Street
SMITH; AURELIA VOGEL a/k/a : Houtzdale, PA 16651
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE MCCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :

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OCT 14 2004

William A. Shaw
Prothonotary/Clerk of Courts

JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004- -CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
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DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :


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the property subject to this :
action, :
Defendants :

MOTION FOR SERVICE BY PUBLICATION

1. Your Petitioners are Lawrence E. Hirschak and Gwen A. Hirschak, his wife, Plaintiffs in the above captioned matter.

2. Petitioners, by attached affidavit incorporated herein by reference thereto, believe that certain named Defendants are deceased or their whereabouts are unknown.

WHEREFORE, Petitioner, by their attorney, Girard Kasubick, Esq., requests that Your Honorable Court grant an order that certain of the herein named Defendants be served by publication as required by law.


Girard Kasubick, Esq.
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595 -CD
GWEN A. HIRCHAK, his wife, : Type of Case:
Plaintiffs : Quiet Title Action
 : Type of Pleading:
vs. : Affidavit
PATRICK DUGAN AND MARY DUGAN : Filed on behalf of:
a/k/a MARY M. DUGAN, his wife; : Plaintiffs
KATE DUGAN a/k/a KATHRYN D. : Counsel Of Record For
YUON; ANATASIA DUGAN a/k/a : This Party:
ANNA G. FITZGERALD; EDWARD L. : Girard Kasubick, Esq.
DUGAN; GERALD DUGAN; WILLIAM : Supreme Court #30109
DUGAN; MARY CORNYN; BERTHA : 611 Brishin Street
SMITH; AURELIA VOGEL a/k/a : Houtzdale, PA 16651
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE MCCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
BEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :

FILED ^{NO}
OCT 14 2004 ^{CC}

William A. Shaw
Prothonotary/Clerk of Courts

KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
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heirs, executors, :
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trustees and assigns, known :
or unknown and any other :
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the property subject to this :
action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004- -CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
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trustees and assigns, known :
or unknown and any other :
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the property subject to this :
action, :
Defendants :

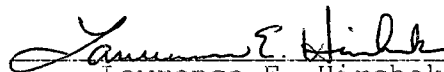
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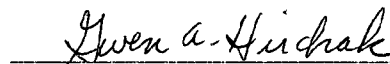
COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF LANCASTER : S:

Before me, the undersigned officer, personally appeared LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, husband and wife, who being duly sworn according to law, deposes and says that the names of the Defendants, Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan; their heirs, executors, administrators, successors, trustees, assigns and successors, known or unknown, are all deceased or

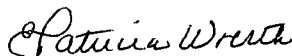
their whereabouts are unknown to the Plaintiffs.

Plaintiffs and their attorney have made an investigation to locate the aforesaid Defendants that are unknown, by checking the records of Clearfield County and by review of the telephone directories in the area, contacting the election office, tax rolls, and voting records, however none of the above were found because they are deceased or their whereabouts are unknown.


Lawrence E. Hirschak


Gwen A. Hirschak

Sworn to and subscribed
before me this 5
day of ~~September~~ October, 2004.



N.P.

Notarial Seal
E. Patricia Woerth, Notary Public
Bart Twp., Lancaster County
My Commission Expires Aug. 20, 2005
Member, Pennsylvania Association of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

: No.: 2004-1595-CD

vs.

: QUIET TITLE ACTION

:
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :

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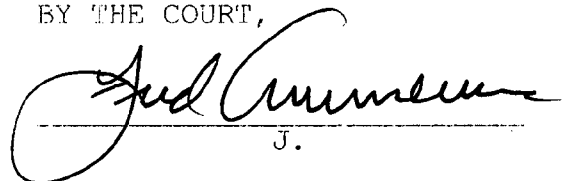
William A. Shaw

trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ORDER DIRECTING COMPLAINT TO BE SERVED
BY ADVERTISEMENT ON DEFENDANTS

NOW, this 15 day of October, 2004, the within Action being an Action to Quiet Title and the Plaintiffs having made Affidavit that the addresses of certain Defendants are unknown and cannot be ascertained, and therefore upon Motion of Girard Kasubick, Esq., Attorney for Plaintiffs, it is Ordered and Decreed that substitute service by publication be made upon the Defendants whose addresses are unknown, or may be deceased, by giving notice in the Progress, a newspaper of general circulation published in the Clearfield County area and in the Clearfield County Legal Journal, to the above named Defendants whose addresses are unknown, or may be deceased; such publication to be one (1) time only stating that this action has been filed, and that this Complaint must be pleaded to within twenty (20) days after publication of notice; otherwise judgment will be taken against all of the Defendants by default.

BY THE COURT,


J.

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IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY PENNSYLVANIA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and GWEN A.
HIRCHAK, his wife,

Plaintiffs,

v.

PATRICK DUGAN, et al.,

Defendants.

NO. 2004-1595-CD

QUIET TITLE ACTION

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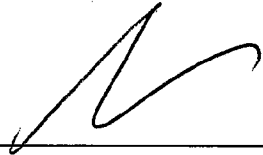
William A. Shaw
Prothonotary/Clerk of Courts

ANSWER OF PATRICIA ANN DUGAN

- 1.-2. After reasonable investigation defendant, Patricia Ann Dugan is without knowledge sufficient to form a belief as to the allegations of this paragraph and proof is demanded.
- 3.-19. The allegations of these paragraphs are directed to individuals other than Patricia Ann Dugan.
20. Admitted.
- 21.-25. The allegations of these paragraphs are directed to individuals other than Patricia Ann Dugan.
26. Admitted.
27. To the extent the allegations of this paragraph are correct recitations of the public records of Clearfield County, they are admitted. However, on information and belief it is denied that notice required by law was furnished to Mary Dugan or the estate of Mary Dugan. Proof of notice is demanded.

27. (f) It is admitted that the lots in question were sold for non-payment of 1956 taxes. By way of further answer, Mary Dugan nor the estate of Mary Dugan were furnished notice of the sale as required by law.
28. The allegations of this paragraph constitute a conclusion of law to which no answer is required.
29. After reasonable investigation defendant, Patricia Ann Dugan is without knowledge sufficient to form a belief as to the allegations of this paragraph and proof is demanded.
- 30.-32. The allegations of these paragraphs constitute conclusion of law to which no answer is required.

WHEREFORE, defendant, Patricia Ann Dugan requests that plaintiffs complaint be dismissed.



GEORGE W. WESTERVELT, JR., ESQ.
Attorney I.D. No. 18195
P.O. Box 549, 706 Monroe Street
Stroudsburg, PA 18360
570.421.6100
Attorney for Defendant Patricia Ann Dugan

COMMONWEALTH OF PENNSYLVANIA:

SS:

COUNTY OF MONROE:

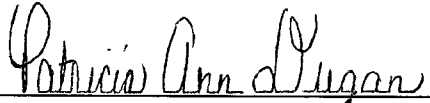
VERIFICATION

Unsworn

(Pa. R.C.P. No. 1024)

The undersigned hereby states that the statements of fact made in the foregoing document are true and correct to the best of my information and belief. The language of the document was prepared on the advice of my attorney and any legal claims or legal defenses asserted in the document are pleaded on the advice of my attorney. If the document contains averments which are inconsistent in fact, then I have been unable after reasonable investigation to ascertain which of the inconsistent averments are true, but to the best of my information and belief, one of them is true. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsifications to authorities.

Dated: November 2, 2004


PATRICIA ANN DUGAN

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY PENNSYLVANIA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and GWEN A.
HIRCHAK, his wife,

Plaintiffs,

v.

PATRICK DUGAN, et al.,

Defendants.

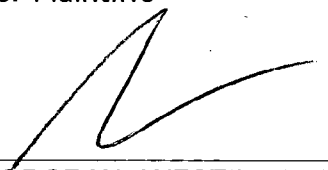
NO. 2004-1595-CD

QUIET TITLE ACTION

CERTIFICATE OF SERVICE

I, GEORGE W. WESTERVELT, JR. hereby certify that on November 2, 2004,
a true and correct copy of defendant, Patricia Ann Dugan's answer of
complaint was served by ordinary mail, postage pre-paid on:

Girard Kasubick, Esq.
Lehman & Kasubick
611 Brisbin Street
Houtzdale, PA 16651
Attorney for Plaintiffs



GEORGE W. WESTERVELT, JR., ESQ.
Attorney I.D. No. 18195
706 Monroe Street, P.O. Box 549
Stroudsburg, PA 18360-0549
570.421.6100
Attorney for Defendant, Patricia Ann Dugan

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|-----------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | Type of Case: |
| Plaintiffs | : | Quiet Title Action |
| | : | Type of Pleading: |
| vs. | : | Praecipe for |
| | : | Reinstatement of |
| | : | Complaint |
| PATRICK DUGAN AND MARY DUGAN | : | Filed on behalf of: |
| a/k/a MARY M. DUGAN, his wife; | : | Plaintiffs |
| KATE DUGAN a/k/a KATHRYN D. | : | Counsel Of Record For |
| YUON; ANATASIA DUGAN a/k/a | : | This Party: |
| ANNA G. FITZGERALD; EDWARD L. | : | Girard Kasubick, Esq. |
| DUGAN; GERALD DUGAN; WILLIAM | : | Supreme Court #30109 |
| DUGAN; MARY CORNYN; BERTHA | : | 611 Brisbin Street |
| SMITH; AURELIA VOGEL a/k/a | : | Houtzdale, PA 16651 |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
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| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
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| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |

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William A. Shaw

Prothonotary/Clerk of Courts

NO (ENL)

10 REISSUED TO

Attc

TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
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Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
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LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
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Plaintiffs :
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vs. : QUIET TITLE ACTION
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DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
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JOSEPH DUGAN; PATRICK DUGAN :
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a/k/a PATRICIA ANN DUGAN; :
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or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

PRAECIPE FOR REINSTATEMENT OF COMPLAINT

TO: William A. Shaw, Prothonotary:

Please reinstate the Complaint in the above captioned
matter.

Dated: November 15, 2004


Girard Kasubick, Esq.
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Jerome Dugan, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

10/12/04
Date *for* Glyce D Evans ^{POT}
Jerome Dugan, Defendant

323 Belaire Drive
Shiremanstown, PA 17011
Defendant's mailing address

POWER OF ATTORNEY - JEROME PAUL DUGAN

I, JEROME PAUL DUGAN, do make, constitute and appoint ALYCE DIXIE EVANS and GREGORY PAUL DUGAN, jointly, and each of them severally, my true and lawful attorney and attorneys for me and in my name, place and stead to demand, receive, collect and hold any and all monies, securities, personal and real property of any nature whatsoever in which I may have any interest; to deal generally and in respects without restriction in and with any property of any nature whatsoever in which I may have any interest; to carry bank accounts for me and in my name in such banks as my said attorneys may deem best and to make deposits of money belonging to me in such accounts and disburse said monies, for any purpose in connection with either the personal needs, support, maintenance, and medical attention of myself, in such amounts and for such purposes and at such times as my said attorneys in their sole unrestricted discretion and judgment may deem best; to make decisions and enter into agreements and arrangements in connection with my personal needs, support, maintenance, and medical attention; to make disbursements of monies belonging to me in such manner, at such times and for such purposes as my attorneys may in their sole unrestricted discretion and judgment deem best for maintenance, upkeep, repair or any other purposes in connection with any real estate or personal property owned by me, to operate, manage, control and lease, any and all real estate owned by me, and to collect, demand and receive the rents, issues, incomes and profits derived therefrom; ~~to exercise general supervision and control over any securities, real estate, and other personal property of any nature whatsoever belonging to me, and to collect dividends, profits, or accruals therefrom and thereon, and to make sale and dispose of the same, all as my said attorneys may in their sole and unrestricted discretion and judgment deem best; to exercise in all respects as full management, control and powers with respect to all of my property as I myself could do; liquidate any assets of mine and to make such investments of any monies belonging to me as my said attorneys in their sole unrestricted judgment and discretion may deem best; to demand, receive, sue for, and recover, any and all monies or rights of any nature whatsoever and from whatever source derived that may now be due to me or which may at any time hereafter become due, and to give in all respects proper receipts, releases, and acquittances therefore, with no liability on the part of the obligor making payments to my attorneys to see to the application of the proceeds of such payments or collections, hereby giving and granting unto my said attorneys full power and authority to do and perform all and every act and thing whatsoever requisite and necessary to be done in and about the premises as full to all intents and purposes as I might or could do, with full power of substitution and revocation, hereby ratifying and confirming all that my attorneys may do.~~ This authority conferred shall continue notwithstanding any subsequent disability or incapacity on my part.

Signed this March day of 15th, _____.

Jerome Paul Dugan
JEROME PAUL DUGAN

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CUMBERLAND

On this, the 15th day of March, 2000 before me, a Notary Public, the undersigned officer, personally appeared JEROME PAUL DUGAN known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument, and acknowledged that he/she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I HEREUNTO SET MY HAND AND OFFICIAL SEAL.

Suzanne M. Dederer
NOTARY PUBLIC

My Commission Expires:

NOTARIAL SEAL
SUZANNE M. DEDERER, Notary Public
Camp Hill, Cumberland County
My Commission Expires Aug. 20, 2001

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
:

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Rita Evanochko, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

16-18-04
Date

Rita Evanochko
Rita Evanochko, Defendant

47 Collins Road
Trenton, New Jersey 08619
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Margaret Laws, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

Oct 15/04
Date

Margaret Laws
Margaret Laws, Defendant

1726 Black Moshannon Road
Philipsburg, PA 16866
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Helen Dugan, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

October 17th 2004
Date

Helen Dugan
Helen Dugan, Defendant

312 Seventeenth Street
Tyrone, PA 16686
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Sara Lenore Dugan, Defendant, accepts service of
the Complaint in the above captioned Quiet Title Action.

Oct 18, 2004
Date

Sara Lenore Dugan
Sara Lenore Dugan, Defendant

272 Juniata Street
Houtzdale, PA 16651
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED
NOV 15 2004
William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Patricia Wade Lobb, Defendant, accepts service of
the Complaint in the above captioned Quiet Title Action.

10/18/04
Date

Patricia Wade Lobb
Patricia Wade Lobb, Defendant

905 Don Street
Houtzdale, PA 16651
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Charles "Chuck" Dugan, Defendant, accepts service
of the Complaint in the above captioned Quiet Title
Action.

10-18-04
Date

Charles "Chuck" Dugan
Charles "Chuck" Dugan, Defendant

601 Bluestone Drive
Allison Park, PA 15101
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED

NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Muriel Dugan Newcombe, Defendant, accepts service
of the Complaint in the above captioned Quiet Title
Action.

Oct. 18, 2004
Date

Muriel Dugan Newcombe
Muriel Dugan Newcombe, Defendant

272 Juniata Street
Houtzdale, PA 16651
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

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NOV 15 2004
William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Mary Oswalt, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

10/16/04
Date

Mary Oswalt
Mary Oswalt, Defendant

1201 Madison Avenue
Altoona, PA 16602
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN; JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

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NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Marjorie Kaufman, Defendant, accepts service of
the Complaint in the above captioned Quiet Title Action.

Oct. 19/2004
Date

Marjorie Kaufman
Marjorie Kaufman, Defendant

133 Oak Ridge Road
Lewistown, PA 17044
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK J. C. :
DUGAN a/k/a PATRICK D. C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

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NOV 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Robert Sutton, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

October 19, 2004
Date

Robert Sutton
Robert Sutton, Defendant

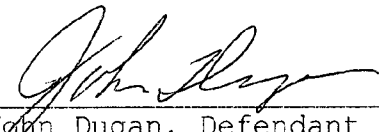
432 South Randolph Street
Macomb, IL 61455
Defendant's mailing address

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, John Dugan, Defendant, accepts service of the
Complaint in the above captioned Quiet Title Action.

10-26-04
Date


John Dugan, Defendant

179 Brahman Avenue
Bridgewater, NJ 08807
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA FOORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

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NOV 15 2004
William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Tracy Ann Hurtack, Defendant, accepts service of
the Complaint in the above captioned Quiet Title Action.

10-18-04
Date

Tracy Ann Hurtack
Tracy Ann Hurtack, Defendant

603 Curtin Street
Osceola Mills, PA 16666
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

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NOV 15 2004
William A. Shaw
Prothonotary/Clerk of Courts

DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, Scott Michael Dugan, Defendant, accepts service
of the Complaint in the above captioned Quiet Title
Action.

10-27-04
Date

Scott Michael Dugan
Scott Michael Dugan, Defendant

111 Moshannon Street
Apartment 2
Philipsburg, PA 16866
Defendant's mailing address

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :

FILED
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NOV 29 2004

William A. Shaw
Prothonotary/Clerk of Courts

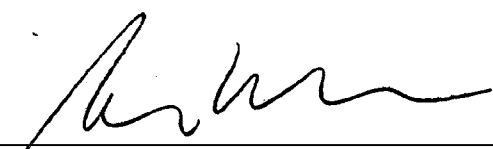
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ACCEPTANCE OF SERVICE

I, George W. Westervelt, Jr., Esq., accept service
of the Complaint, on behalf of Patricia Dugan Smith a/k/a
Patricia Ann Dugan in the above captioned Quiet Title
Action and certify that I am authorized to do so.

11.22.04

Date



George W. Westervelt, Jr., Esq.
Attorney for Patricia Ann Dugan
706 Monroe Street
P.O. Box 549
Stroudsburg, PA 18360-0549

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Court at
Prothonotary's Office

FILED

NOV 29 2004

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,

Defendants

: No.: 2004-1595-CD
:
: Type of Case: Quiet
: Title Action
: Type of Pleading:
: Affidavit of Service
: Filed on behalf of:
: Plaintiffs
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED ^{EGK}
0/12:58/21 ND
DEC 02 2004 ^{CC}

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

: No.: 2004-1595-CD

vs.

: QUIET TITLE ACTION


PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,

Defendants


AFFIDAVIT OF SERVICE

Before me, William A. Shaw, Prothonotary, personally appeared Girard Kasubick, Esq., who being duly sworn according to law, deposes and says that service of the Complaint was made in this case by publication in the Clearfield Progress one time only on October 23, 2004 and in the Clearfield County Legal Journal one time only for the week of October 29, 2004, as appears by sworn proofs hereto attached, and that all the unknown Defendants who are deceased or their whereabouts are unknown were served by publication and not by any other manner; and that certain known named Defendants were legally served by their Acceptances of Services all of which were filed on November 15, 2004 and November 29, 2004 and that six other named Defendants are being served by sheriff. Finally, two named out-of-state Defendants, being Kathleen Dugan and Daniel Dugan, having been served a certified copy of the Complaint in the above-captioned matter by sending it by U.S. certified mail, restricted delivery to Kathleen Dugan on November 16, 2004 and she accepted service on November 27, 2004 and to Daniel Dugan on November 16, 2004 and he accepted service on November 18, 2004, as evidenced by the attached return receipts.

WHEREFORE, this Affidavit of Service is filed of record to
show service on the named Defendants as set forth herein.


Girard Kasubick, Esq.
Attorney for Plaintiffs

Sworn to and subscribed to
before me this 2nd day
of December, 2004.


N.P. *BN*

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

NOTICE
IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY, PA
CIVIL DIVISION
No.: 2004-1595-CD
QUIET TITLE ACTION
LAWRENCE E. HIRCHAK and
GWENA A. HIRCHAK, his wife,
Plaintiffs

vs.
PATRICK DUGAN
AND MARY DUGAN,
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN,
a/k/a KATHRYND. YUON;
ANATASIA DUGAN, a/k/a
ANNA G. FITZGERALD;
EDWARD L. DUGAN;
GERALD DUGAN;
WILLIAM DUGAN;
MARY CORNYN;
BERTHA SMITH;
AURELIA VOGEL,
a/k/a AURELIA VOGLE;
JAMES DUGAN;
JOSEPH DUGAN;
PATRICK DUGAN,
a/k/a PATRICK C. DUGAN;
CATHERINE WADE;
PATRICK C. DUGAN,
a/k/a PATRICK C. DUGAN, JR.;
SOPHIA POORMAN;
MARY SUTTON;
JULIA WARRICK,
a/k/a JULIETTE WARRICK;
JOHN DUGAN;
JEROME DUGAN;
WILLIAM DUGAN;
ROSE McCAMLEY;
RUTH FLAIG;
HANEY DUGAN;
RITA EVANOCHKO;
MARGARET LAWS;
HELEN DUGAN;
SARA LENORE DUGAN;
PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN;
MURIEL DUGAN NEWCOMBE;
ALICE FAYE HEVERLY;
REBECCA POORMAN;
ELOISE HILE;
MARY OSWALT;
MARJORIE KAUFMAN;
ROBERT SUTTON;
JAMES J. DUGAN;
PATRICK DUGAN, a/k/a
PATRICK DUGAN, III;
THOMAS DUGAN;
MARY RUTH CARNEY;
SUE ANN BOTTINGER;
PAUL DUGAN;
JOHN DUGAN;
LAWRENCE DUGAN;
KATHLEEN DUGAN;
MICHAEL DUGAN;
LINDA DUGAN KITKO;
DANIEL DUGAN;
PATRICIA DUGAN SMITH,
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN;
MATTHEW DUGAN;
MARK DUGAN;
TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN;
and their
heirs, executors, administrator,
successors, trustees and as-
signs,
known or unknown and any other
person who may claim title in
the property subject to this action,
Defendants

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

On this 26th day of October, A.D. 20 04,
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 October 23, 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.

Margaret E. Krebs

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

THE PROGRESS

Proof Of Publication - Continued

Page 2 of 2

ACTION TO QUIET TITLE NOTICE

TO: PATRICK DUGAN and MARY DUGAN, a/k/a MARY M. DUGAN; his wife; KATE DUGAN, a/k/a KATHRYN D. YUON; ANATASIA DUGAN, a/k/a ANNA G. FITZGERALD; EDWARD L. DUGAN; GERALD DUGAN; WILLIAM DUGAN; MARY CORNYN; BERTHA SMITH; AURELIA VOGEL, a/k/a AURELIA VOGLE; JAMES DUGAN; JOSEPH DUGAN; PATRICK DUGAN, a/k/a PATRICK C. DUGAN; CATHERINE WADE; PATRICK C. DUGAN, a/k/a PATRICK C. DUGAN, JR.; SOPHIA POORMAN; MARY SUTTON; JULIA WARRICK, a/k/a JULIETTE WARRICK; JOHN DUGAN; JEROME DUGAN; WILLIAM DUGAN; ROSE McCAMLEY; RUTH FLAIG; HANEY DUGAN; RITA EVANOCHKO; MARGARET LAWS; HELEN DUGAN; SARA LENORE DUGAN; PATRICIA WADE LOBB; CHARLES "CHUCK" DUGAN; MURIEL DUGAN NEWCOMBE; ALICE FAYE HEVERLY; REBECCA POORMAN; ELOISE HILE; MARY OSWALT; MARJORIE KAUFMAN; ROBERT SUTTON; JAMES J. DUGAN; PATRICK DUGAN, a/k/a PATRICK DUGAN, III; THOMAS DUGAN; MARY RUTH CARNEY; SUE ANN BOTTINGER; PAUL DUGAN; JOHN DUGAN; LAWRENCE DUGAN; KATHLEEN DUGAN; MICHAEL DUGAN; LINDA DUGAN KITKO; DANIEL DUGAN; PATRICIA DUGAN SMITH, a/k/a PATRICIA ANN DUGAN; TERESA DUGAN; MATTHEW DUGAN; MARK DUGAN; TRACY ANN HURTACK; SCOTT MICHAEL DUGAN; and their heirs, executors, administrators, successors, trustees and assigns, known or unknown.

You have been sued in Court. You are hereby notified that an Action to Quiet Title to the premises situated in Houtzdale Borough, Clearfield County, Pennsylvania, has been

filed against you. Said lands are bounded and described as follows:
BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hun-

dred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35.

You are 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 interest inconsistent with the Plaintiff's claim of title as set forth in the Complaint.

NOTICE

TO: PATRICK DUGAN and MARY DUGAN, a/k/a MARY M. DUGAN, his wife; KATE DUGAN, a/k/a KATHRYN D. YUON; ANATASIA DUGAN, a/k/a ANNA G. FITZGERALD; EDWARD L. DUGAN; GERALD DUGAN; WILLIAM DUGAN; MARY CORNYN; BERTHA SMITH; AURELIA VOGEL, a/k/a AURELIA VOGLE; JAMES DUGAN; JOSEPH DUGAN; PATRICK DUGAN, a/k/a PATRICK C. DUGAN; CATHERINE WADE; PATRICK C. DUGAN, a/k/a PATRICK C. DUGAN, JR.; SOPHIA POORMAN; MARY SUTTON; JULIA WARRICK, a/k/a JULIETTE WARRICK; JOHN DUGAN; JEROME DUGAN; WILLIAM DUGAN; ROSE McCAMLEY; RUTH FLAIG; HANEY DUGAN; RITA EVANOCHKO; MARGARET LAWS; HELEN DUGAN; SARA LENORE DUGAN; PATRICIA WADE LOBB; CHARLES "CHUCK" DUGAN; MURIEL DUGAN NEWCOMBE; ALICE FAYE HEVERLY; REBECCA POORMAN; ELOISE HILE; MARY OSWALT; MARJORIE KAUFMAN; ROBERT SUTTON; JAMES J. DUGAN; PATRICK DUGAN, a/k/a PATRICK DUGAN, III; THOMAS DUGAN; MARY RUTH CARNEY; SUE ANN BOTTINGER; PAUL DUGAN; JOHN DUGAN; LAWRENCE DUGAN; KATHLEEN DUGAN; MICHAEL DUGAN; LINDA DUGAN KITKO; DANIEL DUGAN; PATRICIA DUGAN SMITH, a/k/a PATRICIA ANN DUGAN; TERESA DUGAN; MATTHEW DUGAN; MARK DUGAN; TRACY ANN HURTACK; SCOTT MICHAEL DUGAN; their heirs, executors, administrators, successors, trustees and assigns, known or unknown.

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the Court. You are warned that if you fail to do so, the case may pro-

ceed without you and a judgment may be entered against you without further notice for the relief requested by the Plaintiffs. 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.

David S. Meholic
Court Administrator's Office
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982

LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651

10:23-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

:

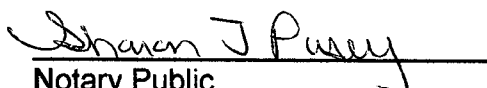
COUNTY OF CLEARFIELD :

On this 1st day of November 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 the notice or advertisement published in said publication in the regular issues of Week of October 29, 2004, No. 44. 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.



Notary Public
My Commission Expires

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

Lehman & Kasubick
611 Brisbin St
Houtzdale PA 16651

CLEARFIELD COUNTY LEGAL JOURNAL

Page 2 of 2

**IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION**

LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife, Plaintiffs vs. PATRICK DUGAN AND MARY DUGAN A/K/A MARY M. DUGAN, his wife; KATE DUGAN A/K/A KATHRYN D. YUON; ANATASIA DUGAN A/K/A ANNA G. FITZGERALD; EDWARD L. DUGAN; GERALD DUGAN; WILLIAM DUGAN; MARY CORNYN; BERTHA SMITH; AURELIA VOGEL A/K/A AURELIA VOGLE; JAMES DUGAN; JOSEPH DUGAN; PATRICK DUGAN A/K/A PATRICK C. DUGAN; CATHERINE WADE; PATRICK C. DUGAN A/K/A PATRICK C. DUGAN, JR.; SOPHIA POORMAN; MARY SUTTON; JULIA WARRICK A/K/A JULIETTE WARRICK; JOHN DUGAN; JEROME DUGAN; WILLIAM DUGAN; ROSE MCCAMLEY; RUTH FLAIG; HANEY DUGAN; RITA EVANOCHKO; MARGARET LAWS; HELEN DUGAN; SARA LENORE DUGAN; PATRICIA WADE LOBB; CHARLES "CHUCK" DUGAN; MURIEL DUBAN NEWCOMBE; ALICE FAYE HEVERLY; REBECCA POORMAN; ELOISE HILE; MARY OSWALT; MARJORIE KAUFMAN; ROBERT SUTTON; JAMES J DUGAN; PATRICK DUGAN A/K/A PATRICK DUGAN, III; THOMAS DUGAN; MARY RUTH CARNEY; SUE ANN BOTTINGER PAUL DUGAN JOHN DUGAN; LAWRENCE DUGAN; KATHLEEN DUGAN; MICHAEL DUGAN; LINDA DUGAN KITKO; DANIEL DUGAN; PATRICIA DUGAN SMITH a/k/a PATRICIA DUGAN SMITH A/K/A PATRICIA ANN DUGAN; TERESA DUGAN; MATTHEW DUGAN; MARK DUGAN; TRACY ANN HURTACK; SCOTT MICHAEL DUGAN; and their heirs, executors, administrators, successors, trustees and assigns, known or unknown

You have been sued in court. You are hereby notified that an action to quiet title to the premises situated in Houtzdale Borough, Clearfield County, Pennsylvania, has been filed against you. Said land is bounded and described as follows:

BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35.

You are 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 interest inconsistent with the Plaintiff's claim of title as set forth in the Complaint.

NOTICE

TO: PATRICK DUGAN AND MARY DUGAN A/K/A MARY M. DUGAN, his wife; KATE DUGAN A/K/A KATHRYN D. YUON; ANATASIA DUGAN A/K/A ANNA G. FITZGERALD; EDWARD L. DUGAN; GERALD DUGAN; WILLIAM DUGAN; MARY CORNYN; BERTHA SMITH; AURELIA VOGEL A/K/A AURELIA VOGLE; JAMES DUGAN; JOSEPH DUGAN; PATRICK DUGAN A/K/A PATRICK C. DUGAN; CATHERINE WADE; PATRICK C. DUGAN A/K/A PATRICK C. DUGAN, JR.; SOPHIA POORMAN; MARY SUTTON; JULIA WARRICK A/K/A JULIETTE WARRICK; JOHN DUGAN; JEROME

No. 04-1595 -CD

**ACTION TO QUIET TITLE
NOTICE**

TO: PATRICK DUGAN AND MARY DUGAN A/K/A MARY M. DUGAN, his wife; KATE DUGAN A/K/A KATHRYN D. YUON; ANATASIA DUGAN A/K/A ANNA G. FITZGERALD; EDWARD L. DUGAN; GERALD DUGAN; WILLIAM DUGAN; MARY CORNYN; BERTHA SMITH; AURELIA VOGEL A/K/A AURELIA VOGLE; JAMES DUGAN; JOSEPH DUGAN; PATRICK DUGAN A/K/A PATRICK C. DUGAN; CATHERINE WADE; PATRICK C. DUGAN A/K/A PATRICK C. DUGAN, JR.; SOPHIA POORMAN; MARY SUTTON; JULIA WARRICK A/K/A JULIETTE WARRICK; JOHN DUGAN; JEROME

DUGAN; WILLIAM DUGAN; ROSE MCCAMLEY; RUTH FLAIG; HANEY DUGAN; RITA EVANOCHKO; MARGARET LAWS; HELEN DUGAN; SARA LENORE DUGAN; PATRICIA WADE LOBB; CHARLES "CHUCK" DUGAN; MURIEL DUBAN NEWCOMBE; ALICE FAYE HEVERLY; REBECCA POORMAN; ELOISE HILE; MARY OSWALT; MARJORIE KAUFMAN; ROBERT SUTTON; JAMES J DUGAN; PATRICK DUGAN A/K/A PATRICK DUGAN, III; THOMAS DUGAN; MARY RUTH CARNEY; SUE ANN BOTTINGER PAUL DUGAN JOHN DUGAN; LAWRENCE DUGAN; KATHLEEN DUGAN; MICHAEL DUGAN; LINDA DUGAN KITKO; DANIEL DUGAN; PATRICIA DUGAN SMITH a/k/a PATRICIA DUGAN SMITH A/K/A PATRICIA ANN DUGAN; TERESA DUGAN; MATTHEW DUGAN; MARK DUGAN; TRACY ANN HURTACK; SCOTT MICHAEL DUGAN; and their heirs, executors, administrators, successors, trustees and assigns, known or unknown

You have been sued in court. You are hereby notified that an action to quiet title to the premises situated in Houtzdale Borough, Clearfield County, Pennsylvania, has been filed against you. Said land is bounded and described as follows:

BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35.

You are 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 interest inconsistent with the Plaintiff's claim of title as set forth in the Complaint.

NOTICE

TO: PATRICK DUGAN AND MARY DUGAN A/K/A MARY M. DUGAN, his wife; KATE DUGAN A/K/A KATHRYN D. YUON; ANATASIA DUGAN A/K/A ANNA G. FITZGERALD; EDWARD L. DUGAN; GERALD DUGAN; WILLIAM DUGAN; MARY CORNYN; BERTHA SMITH; AURELIA VOGEL A/K/A AURELIA VOGLE; JAMES DUGAN; JOSEPH DUGAN;

PATRICK DUGAN A/K/A PATRICK C. DUGAN; CATHERINE WADE; PATRICK C. DUGAN A/K/A PATRICK C. DUGAN, JR.; SOPHIA POORMAN; MARY SUTTON; JULIA WARRICK A/K/A JULIETTE WARRICK; JOHN DUGAN; JEROME DUGAN; WILLIAM DUGAN; ROSE MCCAMLEY; RUTH FLAIG; HANEY DUGAN; RITA EVANOCHKO; MARGARET LAWS; HELEN DUGAN; SARA LENORE DUGAN; PATRICIA WADE LOBB; CHARLES "CHUCK" DUGAN; MURIEL DUBAN NEWCOMBE; ALICE FAYE HEVERLY; REBECCA POORMAN; ELOISE HILE; MARY OSWALT; MARJORIE KAUFMAN; ROBERT SUTTON; JAMES J DUGAN; PATRICK DUGAN A/K/A PATRICK DUGAN, III; THOMAS DUGAN; MARY RUTH CARNEY; SUE ANN BOTTINGER PAUL DUGAN JOHN DUGAN; LAWRENCE DUGAN; KATHLEEN DUGAN; MICHAEL DUGAN; LINDA DUGAN KITKO; DANIEL DUGAN; PATRICIA DUGAN SMITH a/k/a PATRICIA DUGAN SMITH A/K/A PATRICIA ANN DUGAN; TERESA DUGAN; MATTHEW DUGAN; MARK DUGAN; TRACY ANN HURTACK; SCOTT MICHAEL DUGAN; and their heirs, executors, administrators, successors, trustees and assigns, known or unknown

If you wish to defend, you must enter a written appearance personally or by attorney file your defenses or objections in writing with the Court. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the Plaintiffs. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE 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.

David S. Meholic, Court Administrator's Office, Clearfield County Courthouse, One North Second Street, Clearfield, PA 16830 (814) 765-2641. (ext. 5982)

LEHMAN & KASUBICK, 611 Brisbin Street, Houtzdale, PA 16651.

7002 2030 0000 2452 6946

| | |
|--|----------------|
| U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <small>(Domestic Mail Only; No Insurance Coverage Provided)</small> | |
| <small>For delivery information, visit our website at www.usps.com</small> | |
| SCENECTADY NY 12302 | |
| Postage | \$ 1.06 |
| Certified Fee | \$2.30 |
| Return Receipt Fee (Endorsement Required) | \$1.75 |
| Restricted Delivery Fee (Endorsement Required) | \$3.50 |
| Total Postage & Fees | \$ 8.61 |

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| Sent To | |
| Kathleen Dugan | |
| Street, Apt. No., or PO Box No. | 108 Newman Road |
| City, State, ZIP+4 | Scotia, NY 12302 |

PS Form 3800, June 2002 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Kathleen Dugan
 108 Newman Road
 Scotia, NY 12302

2. Article Number (Copy from service label)

7002 2030 0000 2452 6946

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature 7 NOV

X *Kathleen Dugan* ☐ Agent
☒ Addressee

D. Is delivery address different from item 1? X Yes
☐ No

If YES, enter delivery address below:
 PO Box 36
 Morann PA 16663

3. Service Type
 XX Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) XX Yes

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| U.S. Postal Service™ | |
| CERTIFIED MAIL™ RECEIPT | |
| <i>(Domestic Mail Only; No Insurance Coverage Provided)</i> | |
| For delivery information, visit our website at www.usps.com | |
| OWINGS MD 20736 | |
| Postage | \$ 1.06 |
| Certified Fee | \$2.30 |
| Return Receipt Fee (Endorsement Required) | \$1.75 |
| Restricted Delivery Fee (Endorsement Required) | \$3.50 |
| Total Postage & Fees | \$ 8.61 |

Sent To: Daniel Dugan
 Street, Apt. No., or PO Box No. 7140 Decoy Drive
 City, State, ZIP+4 Owings, MD 20736

PS Form 3800, June 2002 See Reverse for Instructions

NOV 16 2004
11/16/2004
USPS 16651

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Daniel Dugan
7140 Decoy Drive
Owings, MD 20736

2. Article Number (Copy from service label)

7002 2030 0000 2452 6953

PS Form 3811, July 1999

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X Daniel Dugan

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☒ Yes

RETURN RECEIPT REQUESTED

Domestic Return Receipt

102595-00-M-0952

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;

: No.: 2004-1595-CD
: Type of Case:
: Quiet Title Action
: Type of Pleading:
: Praecipe for
: Reinstatement of
: Complaint
: Filed on behalf of:
: Plaintiffs
: Counsel Of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: 611 Brisbin Street
: Houtzdale, PA 16651

64
FILED
8/10/11/04
DEC 20 2004
William A. Shaw
Prothonotary/Clerk of Courts
1 cc a
1 Compl
Reinstated to
SHF
Any Pl. 7.00

TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :


MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

PRAECIPE FOR REINSTATEMENT OF COMPLAINT

TO: William A. Shaw, Prothonotary:

Please reinstate the Complaint in the above captioned matter because one (1) Defendant, Lawrence Dugan, has not been served by the Sheriff's Office yet.

Dated: December 20th, 2004


Girard Kasubick, Esq.
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known

: No.: 2004-1595-CD
:
: Type of Case: Quiet
: Title Action
: Type of Pleading:
: Motion for Default
: Judgment Against Certain
: Defendants
: Filed on behalf of:
: Plaintiffs
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED
JAN 18 2005

William A. Shaw
Prothonotary/Clerk of Courts

or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |
| person who may claim title in | : | |

the property subject to this :
action, :
Defendants :

MOTION FOR DEFAULT JUDGMENT AGAINST ALL DEFENDANTS
EXCEPT LAWRENCE DUGAN AND PATRICIA DUGAN SMITH
A/K/A PATRICIA ANN DUGAN

NOW, this 18th day of January, 2005, an Affidavit of Service having been filed on December 2, 2004 and Acceptance of Services having been filed November 15, 2004 on behalf of the Plaintiffs showing that the Complaint was served by publication on the unknown Defendants, Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan, one time only, to wit: October 23, 2004 in the Clearfield Progress and the week of October 29, 2004 in the Clearfield County Legal Journal, and further that all the named Defendants who are deceased or their whereabouts are unknown were not

served in any other manner, and no Defendants served by publication having entered an appearance or filed an Answer or having expressed any purpose of intent to be heard or desire to assert title to said property, and twenty (20) days having elapsed since the last publication, and it appearing that it was impossible to serve any of the Defendants by any other means.

AND FURTHER, that the known Defendants, except Lawrence Dugan and Patricia Dugan Smith a/k/a Patricia Ann Dugan, being Jerome Dugan; Rita Evanochko; Margaret Laws; Helen Dugan; Sara Lenore Dugan; Patricia Wade Lobb; Charles Chuck Dugan; Muriel Dugan Newcombe; Mary Oswalt; Marjorie Kaufman; Robert Sutton; John Dugan; Kathleen Dugan; Michael Dugan; Linda Dugan Kitko; Daniel Dugan; Teresa Dugan; Matthew Dugan; Mark Dugan; Tracy Ann Hurtack; and Scott Michael Dugan, having each been served with a Complaint containing a Notice to Defend and which they accepted service by signing an Acceptance of Service, by out-of-state Certified Mail, or by Sheriff Service as follows: Jerome Dugan on October 12, 2004; Rita Evanochko on October 18, 2004; Margaret Laws on October 15, 2004; Helen Dugan on October 17, 2004; Sara Lenore Dugan on October 18, 2004; Patricia Wade Lobb on October 18, 2004; Charles Chuck Dugan on October 18, 2004; Muriel Dugan Newcombe on October 18, 2004; Mary Oswalt on October 16, 2004; Marjorie Kaufman on October 19, 2004; Robert Sutton


on October 19, 2004; John Dugan on October 26, 2004; Kathleen Dugan on November 27, 2004 by Sheriff; Michael Dugan on November 18, 2004 by Sheriff; Linda Dugan Kitko on November 18, 2004 by Sheriff; Daniel Dugan on November 18, 2004 by certified mail; Teresa Dugan on December 6, 2004 by Sheriff; Matthew Dugan on November 18, 2004 by Sheriff; Mark Dugan on November 22, 2004 by Sheriff; Tracy Ann Hurtack on October 18, 2004; and Scott Michael Dugan on October 27, 2004, as is shown on the Affidavit of Proof of Service filed of record, the Acceptance of Services filed of record, and the Sheriff's return filed of record or to be filed of record. A ten-day notice under Pa. Rules of Civil Procedure 237.4 was sent by regular mail on January 4, 2005 to all known Defendants listed in this paragraph, but not to Lawrence Dugan and Patricia Dugan Smith, a/k/a Patricia Ann Dugan, a copy of all Notices being attached hereto. As of the date of filing this Motion, the Defendants have not filed an Answer or any pleadings to the Complaint, except for Lawrence Dugan who has not been given the ten-day notice yet and Patricia Dugan Smith, a/k/a Patricia Ann Dugan who has filed an Answer, and the ten days has elapsed.

WHEREFORE, Girard Kasubick, Esq., prays your Honorable Court, as attorney for the Plaintiffs, that judgment be entered in favor of the Plaintiffs and against the unknown Defendants, Patrick Dugan and Mary Dugan a/k/a

Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan, their heirs and assigns, and against known Defendants, Jerome Dugan; Rita Evanochko; Margaret Laws; Helen Dugan; Sara Lenore Dugan; Patricia Wade Lobb; Charles Chuck Dugan; Muriel Dugan Newcombe; Mary Oswalt; Marjorie Kaufman; Robert Sutton; John Dugan; Kathleen Dugan; Michael Dugan; Linda Dugan Kitko; Daniel Dugan; Teresa Dugan; Matthew Dugan; Mark Dugan; Tracy Ann Hurtack; and Scott Michael Dugan, with direction that they file suit in ejectment or otherwise enter proceedings to contest the case within thirty (30) days, or judgment may be entered against them forever barring them from asserting any title or claim to the real estate in this action.

Judgment will not be entered against Lawrence Dugan who has only been served on January 5, 2005 nor against

Patricia Dugan Smith a/k/a Patricia Ann Dugan who has
filed an Answer and entered an appearance.


Girard Kasubick, Esq.
Attorney for Plaintiffs

VERIFICATION

I verify that the statements made in the foregoing
Motion for Judgment are true and correct and that false
statements made herein are subject to the penalties of 18
Pa. C.S.A. §4904 relating to unsworn falsification to
authorities.


Girard Kasubick, Esq.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs : QUIET TITLE ACTION

vs. :

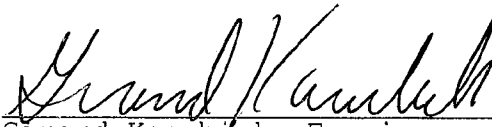
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
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AURELIA VOGLE; JAMES DUGAN; :
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a/k/a PATRICK C. DUGAN; :
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or unknown and any other :
person who may claim title in :

the property subject to this :
action, :
Defendants :

CERTIFICATE OF SERVICE

I hereby certify that I, Girard Kasubick, Esq., served a copy of the Motion for Default Judgment Against all Defendants, except Lawrence Dugan and Patricia Dugan Smith a/k/a Patricia Ann Dugan by regular United States mail, postage pre-paid, mailed on January 18, 2005 upon the attorney for the Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan, who is the only party who has entered an appearance, at the following address:

George W. Westervelt, Jr., Esq.
706 Monroe Street
P.O. Box 549
Stroudsburg, PA 18360-0549


Girard Kasubick, Esquire,
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

: No.: 2004-1595-CD

vs.

: QUIET TITLE ACTION

:
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
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YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
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or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Jerome Dugan
323 Belaire Drive
Shiremanstown, PA 17011

Date of Notice: January 4, 2005

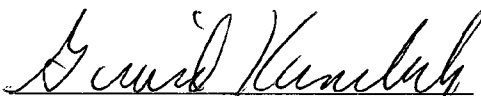
IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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.

Clearfield County Court
Administrator's Office
David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
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vs. : QUIET TITLE ACTION
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a/k/a MARY M. DUGAN, his wife; :
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or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Rita Evanochko
47 Collins Road
Trenton, New Jersey 08619

Date of Notice: January 4, 2005

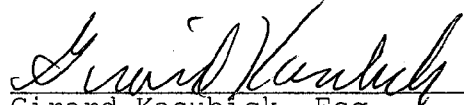
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

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Plaintiffs :
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JOSEPH DUGAN; PATRICK DUGAN :
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SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Margaret Laws
1726 Black Moshannon Road
Philipsburg, PA 16866

Date of Notice: January 4, 2005

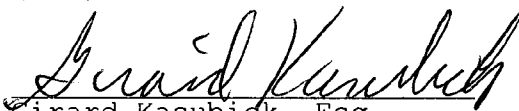
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Clearfield County Court
Administrator's Office
David S. Meholic
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
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a/k/a PATRICIA ANN DUGAN; :
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MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Helen Dugan
312 Seventeenth Street
Tyrone, PA 16686

Date of Notice: January 4, 2005

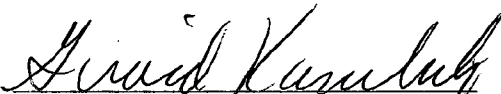
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Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
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Defendants :

TO: Sara Lenore Dugan
272 Juniata Street
Houtzdale, PA 16651

Date of Notice: January 4, 2005

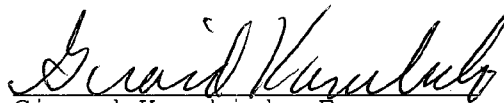
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Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
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vs. : QUIET TITLE ACTION
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or unknown and any other :

person who may claim title in :
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action, :
Defendants :

TO: Patricia Wade Lobb
905 Don Street
Houtzdale, PA 16651

Date of Notice: January 4, 2005

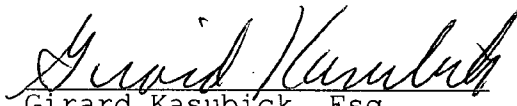
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Administrator's Office
David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
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DUGAN; GERALD DUGAN; WILLIAM :
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JOSEPH DUGAN; PATRICK DUGAN :
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Defendants :

TO: Charles "Chuck" Dugan
601 Bluestone Drive
Allison Park, PA 15101

Date of Notice: January 4, 2005

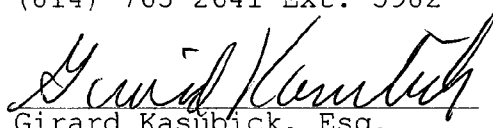
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Administrator's Office
David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

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GWEN A. HIRCHAK, his wife, :
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Defendants :

TO: Muriel Dugan Newcombe
272 Juniata Street
Houtzdale, PA 16651

Date of Notice: January 4, 2005

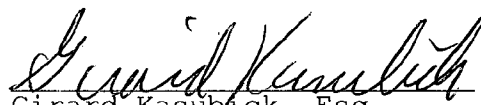
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Defendants :

TO: Mary Oswalt
1201 Madison Avenue
Altoona, PA 16602

Date of Notice: January 4, 2005

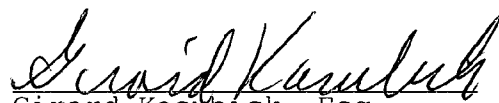
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David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Marjorie Kaufman
133 Oak Ridge Road
Lewistown, PA 17044

Date of Notice: January 4, 2005


IMPORTANT NOTICE

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
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| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
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| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Robert Sutton
432 South Randolph Street
Macomb, IL 61455

Date of Notice: January 4, 2005


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LEHMAN & KASUBICK
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

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| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
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| Plaintiffs | : | |
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| vs. | : | QUIET TITLE ACTION |
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| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
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| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
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| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
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| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
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| SUTTON; JAMES J. DUGAN; | : | |
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| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: John Dugan
179 Brahman Avenue
Bridgewater, NJ 08807

Date of Notice: January 4, 2005

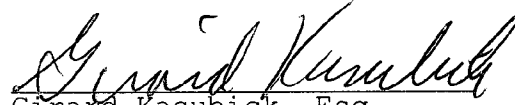
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
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JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
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SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Kathleen Dugan
P.O. Box 36
Morann, PA 16663

Date of Notice: January 4, 2005

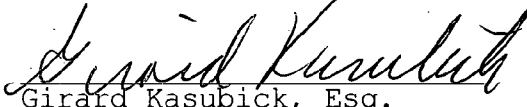
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Defendants :

TO: Michael Dugan
P.O. Box 401
Madera, PA 16661

Date of Notice: January 4, 2005


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person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Linda Dugan Kitko
201 Brisbin Street
Houtzdale, PA 16651

Date of Notice: January 4, 2005


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JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
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ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Daniel Dugan
7140 Decoy Drive
Owings, MD 20736

Date of Notice: January 4, 2005

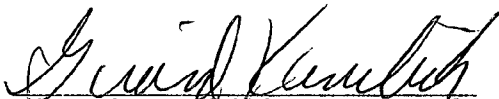
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Clearfield County Court
Administrator's Office
David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
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a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Teresa Dugan
P.O. Box 118
Brisbin, PA 16620

Date of Notice: January 4, 2005


IMPORTANT NOTICE

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LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
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| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Matthew Dugan
P.O. Box 36
Morann, PA 16663

Date of Notice: January 4, 2005

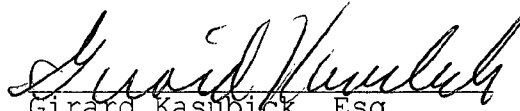
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Clearfield County Court
Administrator's Office
David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
:

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
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a/k/a PATRICK C. DUGAN; :
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DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
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HEVERLY; REBECCA POORMAN; :
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PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
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MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Mark Dugan
Box 215
3406 Ginter-Morann Highway
Morann, PA 16663

Date of Notice: January 4, 2005


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Houtzdale, PA 16651
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
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| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
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| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Tracy Ann Hurtack
603 Curtin Street
Osceola Mills, PA 16666

Date of Notice: January 4, 2005

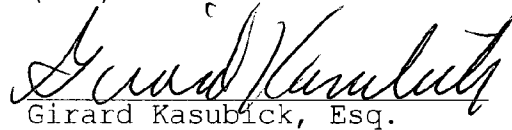
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Girard Kasubick, Esq.

LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

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the property subject to this :
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Defendants :

TO: Scott Michael Dugan
111 Moshannon Street
Apartment 2
Philipsburg, PA 16866

Date of Notice: January 4, 2005

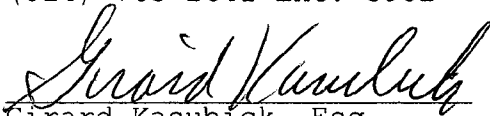
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
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JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
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a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,
Defendants

No.: 2004-1595-CD
Type of Case: Quiet
Title Action
Type of Pleading:
Order of Court
Filed on behalf of:
Plaintiffs
Counsel of Record For
This Party:
Girard Kasubick, Esq.
Supreme Court #30109
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651

Judgment only
against Certain
Defts.

FILED 1CC
01/3:4301
JAN 18 2005
William A. Shaw
Prothonotary/Clerk of Courts
Atty Kasubick

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
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| a/k/a JULIETTE WARRICK; | : | |
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| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |

SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ORDER OF COURT

NOW, this 18th day of January, 2005, an Affidavit having been made that service was made by publication on unknown Defendants in the Clearfield Progress on October 23, 2004, and in the Clearfield County Legal Journal the week of October 29, 2004, and it appearing that it was impossible to serve any other unknown Defendants by any other means, and known Defendants, namely; Jerome Dugan; Rita Evanochko; Margaret Laws; Helen Dugan; Sara Lenore Dugan; Patricia Wade Lobb; Charles Chuck Dugan; Muriel Dugan Newcombe; Mary Oswalt; Marjorie Kaufman; Robert Sutton; John Dugan; Kathleen Dugan; Michael Dugan; Linda Dugan Kitko; Daniel Dugan; Teresa Dugan; Matthew Dugan; Mark Dugan; Tracy Ann Hurtack; and Scott Michael Dugan, being all except for two other Defendants, having defaulted as set forth in the Motion for Judgment filed herewith;

IT IS ORDERED AND DECREED that the unknown Defendants, namely; Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan;

Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan, and the known Defendants, namely; Jerome Dugan; Rita Evanochko; Margaret Laws; Helen Dugan; Sara Lenore Dugan; Patricia Wade Lobb; Charles Chuck Dugan; Muriel Dugan Newcombe; Mary Oswalt; Marjorie Kaufman; Robert Sutton; John Dugan; Kathleen Dugan; Michael Dugan; Linda Dugan Kitko; Daniel Dugan; Teresa Dugan; Matthew Dugan; Mark Dugan; Tracy Ann Hurtack; and Scott Michael Dugan, except for the two Defendants, Lawrence Dugan and Patricia Dugan Smith a/k/a Patricia Ann Dugan, shall file suit in ejectment or otherwise enter a proceeding to contest the case within thirty (30) days, or this Order of Court shall become final upon praecipe by Plaintiffs, which hereby Orders and Decrees that title to the land subject of this action is vested absolutely in the Plaintiffs, their heirs and assigns, free and clear of any and all claims of any nature by any of the named Defendants, except for Lawrence Dugan and Patricia Dugan Smith a/k/a Patricia Ann Dugan, their heirs, executors,

administrators, trustees, successors and assigns or by anyone claiming by, through or under them or any of them, and that the Plaintiffs are seized of an indefeasible title to all those certain three (3) lots situate in Houtzdale Borough, Clearfield County, Pennsylvania, bounded and described as follows:

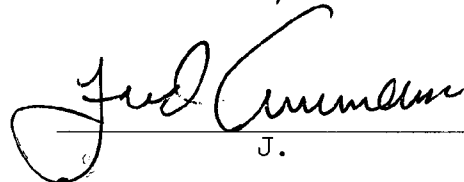
BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35.

BY THE COURT,


J.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100077
NO: 04-1595-CD
SERVICE # 1 OF 1
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK
VS.
DEFENDANT: PATRICK DUGAN al

SHERIFF RETURN

NOW, January 05, 2005 AT 1:46 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON LAWRENCE DUGAN DEFENDANT AT 70 HEMLOCK ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SANDRA DUGAN, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED

JAN 20 2005 614

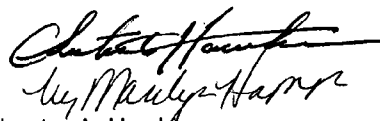
William A. Shaw
Prothonotary

| PURPOSE | VENDOR | CHECK # | AMOUNT |
|-----------------|----------|---------|--------|
| SURCHARGE | KASUBICK | 11623 | 10.00 |
| SHERIFF HAWKINS | KASUBICK | 11623 | 23.95 |

Sworn to Before Me This

_____ Day of _____ 2005

So Answers,


Chester A. Hawkins
Sheriff

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 6 Services

Sheriff Docket # **100001**

Case # 04-1595-CD

LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife

vs.

PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURNS

NOW January 20, 2005 RETURNED THE WITHIN COMPLAINT NOT SERVED AS TO LAWRENCE DUGAN, DEFENDANT. SEVERAL ATTEMPTS-NOT HOME

SERVED BY: /

FILED

JAN 20 2005 6¹⁴

0/3:45(

William A. Shaw
Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100001
NO: 04-1595-CD
SERVICE # 2 OF 6
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife

vs.

DEFENDANT: PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURN

NOW, November 18, 2004 AT 10:50 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON
MICHAEL DUGAN DEFENDANT AT P.O. BOX 401, RT. 53, MADERA, CLEARFIELD COUNTY, PENNSYLVANIA,
BY HANDING TO MARY ZAWORSKY, MOTHER IN LAW A TRUE AND ATTESTED COPY OF THE ORIGINAL
COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100001
NO: 04-1595-CD
SERVICE # 3 OF 6
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife

vs.

DEFENDANT: PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURN

NOW, November 18, 2004 AT 9:53 AM (SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON LINDA DUGAN KITKO DEFENDANT AT 201 BRISBIN ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO LINDA DUGAN KITKO, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100001
NO: 04-1595-CD
SERVICE # 4 OF 6
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife

vs.

DEFENDANT: PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURN

NOW, December 06, 2004 AT 9:18 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON
TERESA DUGAN DEFENDANT AT P.O. BOX 118, SWOOPE ST., BRISBIN, CLEARFIELD COUNTY,
PENNSYLVANIA, BY HANDING TO ADAM WALSTROM, SON A TRUE AND ATTESTED COPY OF THE ORIGINAL
COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100001
NO: 04-1595-CD
SERVICE # 5 OF 6
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife

vs.

DEFENDANT: PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURN

NOW, November 18, 2004 AT 9:00 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON MATTHEW DUGAN DEFENDANT AT CLEARFIELD CO. JAIL, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MATTHEW DUGAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100001
NO: 04-1595-CD
SERVICE # 6 OF 6
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife

vs.

DEFENDANT: PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURN

NOW, — November 22, 2004 AT 9:45 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON MARK DUGAN DEFENDANT AT BOX 215, 3406 GINTER-MORANN HWY., MORANN, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MARK DUGAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100001
NO: 04-1595-CD
SERVICES 6
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife
vs.
DEFENDANT: PATRICK DUGAN and MARY DUGAN a/k/a MARY M. DUGAN, his wife etal

SHERIFF RETURN

RETURN COSTS

| Description | Paid By | CHECK # | AMOUNT |
|-----------------|-------------------|---------|--------|
| SURCHARGE | Girard & Kasubick | 11577 | 60.00 |
| SHERIFF HAWKINS | Girard & Kasubick | 11578 | 47.37 |

Sworn to Before Me This

_____ Day of _____ 2005

So Answers,


by Marilyn Hamr

Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN and
MARY DUGAN a/k/a MARY M.
DUGAN, his wife;

KATE DUGAN a/k/a KATHRYN D.
YUON;

ANATASIA DUGAN a/k/a ANNA
G. FITZGERALD;

EDWARD L. DUGAN;

GERALD DUGAN;

WILLIAM DUGAN;

MARY CORNYN;

BERTHA SMITH;

AURELIA VOGEL
a/k/a AURELIA VOGLE;

JAMES DUGAN;

JOSEPH DUGAN;

PATRICK DUGAN a/k/a
PATRICK C. DUGAN;

CATHERINE WADE;

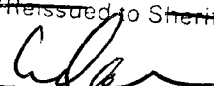
PATRICK C. DUGAN a/k/a
PATRICK C. DUGAN, JR.;

SOPHIA POORMAN;

MARY SUTTON;

JULIA WARRICK
a/k/a JULIETTE WARRICK;


: No.: 2004-1595 -CD
: Type of Case:
: Quite Title Action
: Type of Pleading:
: Complaint
: Filed on behalf of:
: Plaintiffs
: Counsel Of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: 611 Brisbin Street
: Houtzdale, PA 16651

Nov. 15, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

OCT 14 2004

Attest.


Prothonotary/
Clerk of Courts

JOHN DUGAN;
JEROME DUGAN;
WILLIAM DUGAN;
ROSE McCAMLEY;
RUTH FLAIG;
HANEY DUGAN;
RITA EVANOCHKO;
MARGARET LAWS;
HELEN DUGAN;
SARA LENORE DUGAN;
PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN;
MURIEL DUGAN NEWCOMBE;
ALICE FAYE HEVERLY;
REBECCA POORMAN;
ELOISE HILE;
MARY OSWALT;
MARJORIE KAUFMAN;
ROBERT SUTTON;
JAMES J. DUGAN;
PATRICK DUGAN
a/k/a PATRICK DUGAN, III;
THOMAS DUGAN;
MARY RUTH CARNEY;
SUE ANN BOTTINGER;
PAUL DUGAN;

JOHN DUGAN;
LAWRENCE DUGAN;
KATHLEEN DUGAN;
MICHAEL DUGAN;
LINDA DUGAN KITKO;
DANIEL DUGAN;
PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN;
MATTHEW DUGAN;
MARK DUGAN;
TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN;
and their heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title
in the property subject to
this action,
Defendants

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004- -CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :

vs. : QUIET TITLE ACTION
:

PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :

administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
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 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 Plaintiffs. 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.

David S. Meholick
Court Administrator's Office
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | | |
|--------------------------------|---|--------------------|------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-- | --CD |
| GWEN A. HIRCHAK, his wife, | : | | |
| Plaintiffs | : | | |
| | : | | |
| vs. | : | QUIET TITLE ACTION | |
| | : | | |
| PATRICK DUGAN AND MARY DUGAN | : | | |
| a/k/a MARY M. DUGAN, his wife; | : | | |
| KATE DUGAN a/k/a KATHRYN D. | : | | |
| YUON; ANATASIA DUGAN a/k/a | : | | |
| ANNA G. FITZGERALD; EDWARD L. | : | | |
| DUGAN; GERALD DUGAN; WILLIAM | : | | |
| DUGAN; MARY CORNYN; BERTHA | : | | |
| SMITH; AURELIA VOGEL a/k/a | : | | |
| AURELIA VOGLE; JAMES DUGAN; | : | | |
| JOSEPH DUGAN; PATRICK DUGAN | : | | |
| a/k/a PATRICK C. DUGAN; | : | | |
| CATHERINE WADE; PATRICK C. | : | | |
| DUGAN a/k/a PATRICK C. | : | | |
| DUGAN, JR.; SOPHIA POORMAN; | : | | |
| MARY SUTTON; JULIA WARRICK | : | | |
| a/k/a JULIETTE WARRICK; | : | | |
| JOHN DUGAN; JEROME DUGAN; | : | | |
| WILLIAM DUGAN; ROSE MCCAMLEY; | : | | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | | |
| EVANOCHKO; MARGARET LAWS; | : | | |
| HELEN DUGAN; SARA LENORE | : | | |
| DUGAN; PATRICIA WADE LOBB; | : | | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | | |
| DUGAN NEWCOMBE; ALICE FAYE | : | | |
| HEVERLY; REBECCA POORMAN; | : | | |
| ELOISE HILE; MARY OSWALT; | : | | |
| MARJORIE KAUFMAN; ROBERT | : | | |
| SUTTON; JAMES J. DUGAN; | : | | |
| PATRICK DUGAN a/k/a PATRICK | : | | |
| DUGAN, III; THOMAS DUGAN; | : | | |
| MARY RUTH CARNEY; SUE ANN | : | | |
| BOTTINGER; PAUL DUGAN; | : | | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | | |
| LINDA DUGAN KITKO; DANIEL | : | | |
| DUGAN; PATRICIA DUGAN SMITH | : | | |
| a/k/a PATRICIA ANN DUGAN; | : | | |
| TERESA DUGAN; MATTHEW DUGAN; | : | | |
| MARK DUGAN; TRACY ANN HURTACK; | : | | |
| SCOTT MICHAEL DUGAN; and their | : | | |
| heirs, executors, | : | | |

administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

COMPLAINT

AND NOW comes LAWRENCE E. HIRCHAK and GWEN A. HIRCHAK, his wife, by and through their attorney, Girard Kasubick, Esq., and files the following Complaint:

1. The Plaintiffs are Lawrence E. Hirschak and Gwen A. Hirschak, who resides at 893 Hidden Hollow Drive, Gap, Pennsylvania 17527.

2. The Defendants, Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan; and their heirs, executors, administrators, successors, trustees and

assigns, known or unknown, and any other person who may claim title under them, and who are deceased or their whereabouts are unknown.

3. The Defendant, Jerome Dugan, resides at 323 Belaire Drive, Shiremanstown, PA 17011.

4. The Defendant, Rita Evanochko, resides at 47 Collins Road, Trenton, New Jersey 08619.

5. The Defendant, Margaret Laws, resides at 1726 Black Moshannon Road, Philipsburg, PA 16866.

6. The Defendant, Helen Dugan, resides 312 Seventeenth Street, Tyrone, PA 16686.

7. The Defendant, Sara Lenore Dugan, resides at 272 Juniata Street, Houtzdale, PA 16651.

8. The Defendant, Patricia Wade Lobb, resides at 905 Don Street, Houtzdale, PA 16651.

9. The Defendant, Charles "Chuck" Dugan, resides at 601 Bluestone Drive, Allison Park, PA 15101.

10. The Defendant, Muriel Dugan Newcombe, resides at 272 Juniata Street, Houtzdale, PA 16651.

11. The Defendant, Mary Oswalt, resides at 1201 Madison Avenue, Altoona, PA 16602.

12. The Defendant, Marjorie Kaufman, resides at 133 Oak Ridge Road, Lewistown, PA 17044.

13. The Defendant, Robert Sutton, resides at 432 South Randolph Street, Macomb, IL 61455.

14. The Defendant, John Dugan, resides at 179 Brahman Avenue, Bridgewater, NJ 08807.

15. The Defendant, Lawrence Dugan, resides at 70 Hemlock Street, Houtzdale, PA 16651.

16. The Defendant, Kathleen Dugan, resides at 108 Newman Road, Scotia, NY 12302.

17. The Defendant, Michael Dugan, resides at P.O. Box 401, Madera, PA 16661.

18. The Defendant, Linda Dugan Kitko, resides at 201 Brisbin Street, Houtzdale, PA 16651.

19. The Defendant, Daniel Dugan, resides at 7140 Decoy Drive, Owings, MD 20736.

20. The Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan, resides at 16 Spring Lake Drive, East Stroudsburg, PA 18301.

21. The Defendant, Teresa Dugan, resides at P.O. Box 118, Brisbin, PA 16620.

22. The Defendant, Matthew Dugan, resides at P.O. Box 36, Morann, PA 16663.

23. The Defendant, Mark Dugan, resides at Box 215, 3406 Ginter-Morann Highway, Morann, PA 16663.

24. The Defendant, Tracy Ann Hurtack, resides at 603 Curtin Street, Osceola Mills, PA 16666.

25. The Defendant, Scott Michael Dugan, resides at 717 Curve Street, Philipsburg, PA 16866.

26. The real property involved in and subject to

this action is all that certain piece or parcel of land containing three (3) lots situate in Houtzdale Borough, Clearfield County, Pennsylvania, bounded and described as follows:

BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35. The above property hereinafter referred to as "Premises".

27. The deeds and method by which Lawrence E. Hirchak and Gwen A. Hirchak, his wife, obtained title to the real properties described in Paragraph 26 of this Complaint is as follows:

a). The Premises was conveyed to Lawrence E. Hirchak and Gwen A. Hirchak, his wife, by deed from Lawrence E. Hirchak dated October 7, 1989, and recorded in Clearfield County Deeds and Records Book 1307, Page 318. The deed contained only the boulder description in Paragraph 26 above.

b). The Premises was conveyed to Lawrence E. Hirschak by deed from Sara L. Dugan, single, dated September 10, 1979 and recorded in Clearfield County Deed Book 789, Page 62. This deed contained only the boulder description in Paragraph 26 above.

c). The Premises was conveyed to Sara L. Dugan by deed from Sara Dugan, widow, dated May 15, 1965 and recorded in Clearfield County Deed Book 514, Page 555. This deed states this is a parent to child conveyance. This deed contained only the boulder description in Paragraph 26 above, except the North boulder is said to be Deer Alley not Bear Alley. It is averred Deer Alley is incorrect in this description.

d). The Premises was conveyed to Sara Dugan by deed from William U. Smith and Terry C. Smith, his wife, dated September 22, 1960 and recorded in Clearfield County Deed Book 485, Page 519. This deed contained only the boulder description in Paragraph 26 above, except the North boulder is said to be Deer Alley not Bear Alley. It is averred Deer Alley is incorrect in this description.

e). The Premises was conveyed to William U. Smith by deed from R. Curtis Smith, Treasurer of Clearfield County in the name of the Mary Dugan Estate, dated May 11, 1959 and recorded in Clearfield County Deed Book 485, Page 515. This deed contained only the boulder

description in Paragraph 26 above, except the North bounder is said to be Deer Alley not Bear Alley. It is averred Deer Alley is incorrect in this description.

f). The three (3) lots conveyed in Clearfield County Deed Book 485, Page 515 above were sold for non-payment of 1956 taxes and notes the property was assessed to the Mary Dugan Estate. This Treasurers Tax Sale was confirmed by Order of Court dated March 10, 1959 found in Court of Common Pleas of Clearfield County File No. 235 November Term 1958 in Clearfield County Prothonotary Docket No. 168, Page 271.

g). After diligent search of the records of the Recorders Office of Clearfield County no recorded deed was found into Mary Dugan for the Premises subject of this action.

h). The assessment records of Houtzdale Borough, Clearfield County shows the Mary Dugan Estate assessed with various tracts of land from 1926 to 1960. Only one of these assessments is 3L or 3 Lots. On various years assessment records between 1945 and 1959 the 3L are listed as bounded on North by Deer Alley, South by Clara Street, East by Harry Street and West by Alley. Deer Alley is again incorrect. Also some of these years assessments records give a deed reference on these 3L as Deed Book 159, page 137 as in subparagraph i). below.

i). The Premises subject of this action was conveyed to Patrick Dugan by deed from the heirs of Daniel Houtz dated July 6, 1891 and recorded in Deed Book 159, Page 137. The description in this deed is the second description described in Paragraph 26. above. It does describe Bear Alley to the North and not Deer Alley as is incorrectly stated in part of this chain of title.

j). The assessment records of Houtzdale Borough, Clearfield County shows Mary Dugan rather than Mary Dugan Estate assessed with the 3L in 1925.

k). The assessment records of Houtzdale Borough, Clearfield County shows Mary Dugan assessed with a L or lot from 1909 to 1924 and then in 1925 this L is changed to 3L.

l). The assessment records of Houtzdale Borough, Clearfield County shows in 1909 that the L assessed to Mary Dugan is from Patk Dugan which is averred to be Patrick Dugan.

m). The assessment records of Houtzdale Borough, Clearfield County shows Patrick Dugan assessed with various tracts between 1888 and 1907. One assessment is listed as Plot #527 on Harry and Clara Street that was the only tract assessed to him in 1907. There is no assessment to Patrick Dugan after 1907.

n). The Plan of Houtzdale Borough on file in the Clearfield County Assessment Office shows no Lot or

Plot No. 527 on Harry Street. The Plan does show Lots 524, 525, and 526 on Harry Street South of Clara Street, but the lots on Harry Street, North of Clara Street being the subject Premises, are lots 907, 908, and 909 on said Plan.

o). It is averred that the deed to Patrick Dugan in subparagraph i). above is the same as the Lot or Plot assessed as No. 527 to Patrick Dugan which was transferred to Mary Dugan on assessment records in 1909 and which became the 3L assessed to Mary Dugan and Mary Dugan Estate in 1925 and 1926.

p). After diligent search of the records of the Recorders Office of Clearfield County, no recorded deed was found where Patrick Dugan conveyed out the Premises described in Deed Book 159, Page 137 set forth in subparagraph i). above to Mary Dugan or any other person or entity.

q). It is believed and averred that Mary Dugan was the wife of Patrick Dugan and Clearfield County records show Patrick Dugan and Clearfield County Records show Patrick Dugan married Mary Glynn on January 16, 1890 in Marriage Docket 7, Page 2252.

r). After diligent search of the records of Register of Wills office of Clearfield County, no estate could be found on Patrick Dugan except for the Estate of Patrick C. Dugan who died July 8, 1947, as set

forth below in subparagraph bb). which is believed to be the son of the Patrick Dugan in Deed Book 159, Page 137.

s). It is averred Mary Dugan a/k/a Mary M. Dugan and wife of Patrick Dugan died on July 16, 1925 and her estate is found in the Register of Wills office of Clearfield County in Estate File No. 10094.

t). The estate of Mary Dugan a/k/a Mary M. Dugan shows she had eleven (11) children, namely; Kate Dugan, Anatasia Dugan, Edward L. Dugan, Gerald Dugan, William Dugan, Mary Cornyn, Bertha Smith, Mrs. William Vogel, James Dugan, Joseph Dugan, and Patrick Dugan. Kate Dugan married and her married name was Kathryn D. Yuon. Anatasia Dugan married and her married name was Anna G. Fitzgerald. Mrs. William Vogel was also known as Aurelia Vogel a/k/a Aurelia Vogle. Patrick Dugan was also known as Patrick C. Dugan who was the son of Patrick Dugan.

u). The estate of Mary Dugan a/k/a Mary M. Dugan, by her will in Will Book N, Page 178 devised various tracts of real property and the premises subject of this action appear to be Stone Quarry lots and/or the 3 Lots near German Lutheran Church to her son, Gerald Dugan.

v). After diligent search of the records of the Records Office and Register of Wills Office of Clearfield County no deed out of Mary Dugan or Mary Dugan Estate or into Gerald Dugan for the premises was found nor

is there an accounting in the estate of Mary Dugan a/k/a Mary M. Dugan distributing the premises to Gerald Dugan.

w). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Gerald Dugan, William Dugan, Mary Cornyn, Bertha Smith, James Dugan or Joseph Dugan, six (6) of the eleven (11) children of Patrick Dugan and Mary Dugan.

x). It is averred that Kate Dugan, one of the eleven (11), married and was known as Kate Dugan Yuon or Kathryn Dugan Yuon and she died May 19, 1972 as shown by Clearfield County Estate File No. 72-286, and by her Will in Will Book 19, Page 148 she devised her estate to nieces, Sara Lenore Dugan and Helen Dugan.

y). It is averred that Antasia Dugan, one of the eleven (11), married and was known as Anna Dugan Fitzgerald or Anatasia Dugan Fitzgerald and she died on May 20, 1966 as shown by Clearfield County Estate File No. 26543 and by her Will in Will Book 11, Page 275 she devised all her property to her two sisters, Kathryn Dugan Yuon and Aurelia Dugan Vogle.

z). Edward L. Dugan, one of the eleven (11), died March 23, 1957. As shown by Clearfield County Estate File No. 23014 and by his Will in Will Book 3, Page 299, he devises his real property as part of his residue to his Executor, William G. Dugan and Executrix, Kathryn

Dugan Yuon to distribute at their discretion, but his intestate heirs would be his siblings.

aa). Mrs. William Vogel, one of the eleven (11), also known as Aurelia Dugan Vogel and Aurilia Dugan Vogle, and she died on February 16, 1976 as shown by Clearfield County Estate File No. 76-93, and by her Will in Will Book 29, Page 495 she devised her residue to Patricia Wade, Charles "Chuck" Dugan, Helen Dugan, and Muriel Dugan Newcombe.

bb). Patrick C. Dugan, one of the eleven (11), died July 8, 1947 as shown by Clearfield County Estate File No. 19695 and by his holographic Will there is no mention of any interest in the property subject of this action nor is there any residue clause, but his heirs in the petition for letter is listed as his fourteen (14) children namely; Catherine Wade, Patrick C. Dugan, Jr., Sophia Poorman, Mary Sutton, Julia Warrick, John Dugan, Jerome Dugan, William Dugan, Rose McCamley, Ruth Flaig, Haney Dugan, Rita Evanochko, Margaret Laws, and Helen Dugan.

cc). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Sara Lenore Dugan and Helen Dugan, heirs of Kate Dugan Yuon a/k/a Kathryn Dugan Yuon.

dd). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Patricia Wade, Charles "Chuck" Dugan, Helen Dugan and Muriel Dugan Newcombe heirs of Mrs. William Vogel a/k/a Aurelia Dugan Vogel a/k/a Aurilia Dugan Vogle.

ee). After diligent search of the records of the Register of Wills Office of Clearfield County no estates could be found on Catherine Wade, Patrick C. Dugan, Jr., Mary Sutton, Julia Warrick, John Dugan, Jerome Dugan, William Dugan, Rose McCamley, Ruth Flaig, Haney Dugan, Rita Evanochko, Margaret Laws and Helen Dugan, thirteen (13) of the fourteen (14) of Patrick Dugan, son of Patrick Dugan and Mary Dugan in subparagraph bb). above.

ff). Sophia Poorman, one of the fourteen (14) heirs of Patrick Dugan died on May 21, 1992 as shown by Clearfield County Estate File No. 1990-392 and by her Will in Will Book 74, Page 288 she devised a percent of her estate to sixteen (16) different heirs, some siblings, some nieces and nephews and some of whom died before Sophia whose issue were devised their share. In all, their were thirty (30) heirs listed as follows:

Catherine D. Wade, Margaret D. Laws, Juliette Warrick, Rose McCamley, Patricia Lou Lobb, Rita Evanochko, Helen Dugan, Jerome Dugan, Alice Faye Heverly, Rebecca Poorman,

Eloise Hile, Mary Oswalt, Marjorie Kaufman, Robert Sutton (issue of Mary Sutton), James J. Dugan (issue of Patrick Dugan), Patrick Dugan (issue of Patrick Dugan), Thomas Dugan (issue of Patrick Dugan), Mary Ruth Carney(issue of Patrick Dugan), Sue Ann Bottinger (issue of Patrick Dugan), all of the remaining names below being issue of Haney Dugan, namely, Paul Dugan, John Dugan, Lawrence Dugan, Kathleen Dugan, Michael Dugan, Linda Dugan Kitko, Daniel Dugan, Patricia Dugan Smith, Teresa Dugan, Matthew Dugan, Mark Dugan.

gg). After diligent search of the records of the Register of Wills Office of Clearfield County, no estates could be found on any of the thirty (30) names in subparagraph ff). above except for Paul Dugan (issue of Haney Dugan), who died on September 17, 2001 and his estate is filed in Clearfield County Estate File No. 2001-720 and the records in the estate show he had two children as heirs being Tracy Ann Hurtack and Scott Michael Dugan.

28. The Plaintiffs and their predecessors in title have been in open, continuous, notorious, actual, exclusive, visible, distinct and hostile possession of the premises described in Paragraph 26 of this Complaint in excess of twenty-one (21) years immediately preceding the filing of this Action, and thereby claim title by adverse possession.

29. The Plaintiffs have constructed a house on the premises which has been there for more than 21 years and they have mowed grass, landscaped, and maintained the premises and lived on the premises for more than 21 years.

30. This Quiet Title Action is also necessary to establish a proper chain of title out of which the real property subject of this action comes, because of irregularities in the chain of title, including possible unrecorded deeds, variances in the descriptions, tax sale deeds, unclear tax assessments, quit-claim deeds, and possible double chain of title, no proof of deaths or estates of record proving heirs, all of which raise a question as to the chain of title to the property and create a cloud on title.

31. It is finally averred that this Quiet Title Action is necessary to determine the validity or discharge of any document, obligation, assessment or deed affecting any right, title and interest in the property subject of this action, which may affect the rights of the Defendants and their heirs.

32. The Defendants to this Action namely; Patrick Dugan and Mary Dugan a/k/a Mary M. Dugan, his wife; Kate Dugan a/k/a Kathryn D. Yuon; Anatasia Dugan a/k/a Anna G. Fitzgerald; Edward L. Dugan; Gerald Dugan; William Dugan; Mary Cornyn; Bertha Smith; Aurelia Vogel a/k/a Aurelia Vogle; James Dugan; Joseph Dugan; Patrick Dugan a/k/a

Patrick C. Dugan; Catherine Wade; Patrick C. Dugan a/k/a Patrick C. Dugan, Jr.; Sophia Poorman; Mary Sutton; Julia Warrick a/k/a Juliette Warrick; John Dugan; William Dugan; Rose McCamley; Ruth Flaig; Haney Dugan; Alice Faye Heverly; Rebecca Poorman; Eloise Hile; James J. Dugan; Patrick Dugan a/k/a Patrick Dugan, III; Thomas Dugan; Mary Ruth Carney; Sue Ann Bottinger; Paul Dugan; are deceased or their whereabouts are unknown and Plaintiffs have made a diligent and reasonable search to locate the whereabouts of the Defendants, but they are deceased or their whereabouts are unknown.

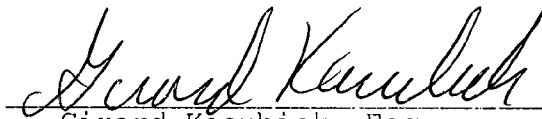
WHEREFORE, Plaintiffs bring this action and respectfully requests the Court to decree as follows:

a). That the Plaintiffs, their heirs, executors, personal representatives and assigns are seized of an indefeasible title to the property situated in Houtzdale Borough, Clearfield County, Pennsylvania, described herein and that an Order and Decree be entered adjudicating that each of the Defendants and any of their heirs, successors, trustees, personal representatives, or assigns be forever barred from asserting any right, title, lien or interest in the within described parcel of land.

b). That such other relief be granted as may be necessary in establishing Plaintiffs' title, including determinations on the validity or discharge of any


documents, obligations or deeds affecting right, title and interest in the property described herein.

c). Such other and further relief as the Court deems proper.


Girard Kasubick, Esq.
Attorney for Plaintiffs

VERIFICATION

We, the undersigned, verify that the statements made in the foregoing Complaint are true and correct. We understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. 4904 relating to unsworn falsification to authorities.


Lawrence E. Hirschak


Gwen A. Hirschak

FILED

JAN 20 2005

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;

: No.: 2004-1595-CD
:
: Type of Case: Quiet
: Title Action
: Type of Pleading:
: Motion for Default
: Judgment Against
: Defendant, Lawrence
: Dugan
: Filed on behalf of:
: Plaintiffs.
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED

FEB 09 2005

6/11/05
William A. Shaw

Prothonotary/Clerk of Courts

No. Case Com

SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |

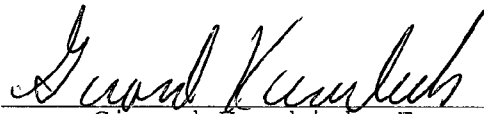
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

MOTION FOR DEFAULT JUDGMENT AGAINST
DEFENDANT, LAWRENCE DUGAN

NOW, this 9th day of February, 2005, the known Defendant, Lawrence Dugan, having been served with a Complaint containing a Notice to Defend by Sheriff Service on January 5, 2005, accepted by his wife, Sandra Dugan, as is shown by the Sheriff's return filed of record. After twenty (20) days elapsed from service, Lawrence Dugan filed no responsive pleading and a ten-day notice under Pa. Rules of Civil Procedure 237.4 was sent by regular mail on January 26, 2005 to Lawrence Dugan, a copy of the Notice being attached hereto. As of the date of filing this Motion, the Defendant, Lawrence Dugan, has not filed an Answer or any pleadings to the Complaint and the ten days has elapsed.

WHEREFORE, Girard Kasubick, Esq., prays your Honorable Court, as attorney for the Plaintiffs, that judgment be entered in favor of the Plaintiffs and against the known Defendant, Lawrence Dugan, with direction that he file suit in ejectment or otherwise enter proceedings

to contest the case within thirty (30) days, or judgment may be entered against him forever barring him from asserting any title or claim to the real estate in this action.


Girard Kasubick, Esq.,
Attorney for Plaintiffs

VERIFICATION

I verify that the statements made in the foregoing Motion for Judgment are true and correct and that false statements made herein are subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.


Girard Kasubick, Esq.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs :
vs. : QUIET TITLE ACTION
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :

person who may claim title in :
the property subject to this :
action, :
Defendants :

TO: Lawrence Dugan
70 Hemlock Street
Houtzdale, PA 16651

Date of Notice: January 26, 2005


IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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.

Clearfield County Court
Administrator's Office
David S. Meholick
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 Ext. 5982


Girard Kasubick, Esq.
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651
(814) 378-7840

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and : No.: 2004-1595-CD
GWEN A. HIRCHAK, his wife, :
Plaintiffs : QUIET TITLE ACTION

vs. :

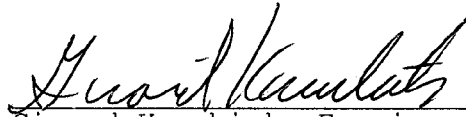
PATRICK DUGAN AND MARY DUGAN :
a/k/a MARY M. DUGAN, his wife; :
KATE DUGAN a/k/a KATHRYN D. :
YUON; ANATASIA DUGAN a/k/a :
ANNA G. FITZGERALD; EDWARD L. :
DUGAN; GERALD DUGAN; WILLIAM :
DUGAN; MARY CORNYN; BERTHA :
SMITH; AURELIA VOGEL a/k/a :
AURELIA VOGLE; JAMES DUGAN; :
JOSEPH DUGAN; PATRICK DUGAN :
a/k/a PATRICK C. DUGAN; :
CATHERINE WADE; PATRICK C. :
DUGAN a/k/a PATRICK C. :
DUGAN, JR.; SOPHIA POORMAN; :
MARY SUTTON; JULIA WARRICK :
a/k/a JULIETTE WARRICK; :
JOHN DUGAN; JEROME DUGAN; :
WILLIAM DUGAN; ROSE McCAMLEY; :
RUTH FLAIG; HANEY DUGAN; RITA :
EVANOCHKO; MARGARET LAWS; :
HELEN DUGAN; SARA LENORE :
DUGAN; PATRICIA WADE LOBB; :
CHARLES "CHUCK" DUGAN; MURIEL :
DUGAN NEWCOMBE; ALICE FAYE :
HEVERLY; REBECCA POORMAN; :
ELOISE HILE; MARY OSWALT; :
MARJORIE KAUFMAN; ROBERT :
SUTTON; JAMES J. DUGAN; :
PATRICK DUGAN a/k/a PATRICK :
DUGAN, III; THOMAS DUGAN; :
MARY RUTH CARNEY; SUE ANN :
BOTTINGER; PAUL DUGAN; :
JOHN DUGAN; LAWRENCE DUGAN; :
KATHLEEN DUGAN; MICHAEL DUGAN; :
LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :

trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

CERTIFICATE OF SERVICE

I hereby certify that I, Girard Kasubick, Esq., served a copy of the Motion for Default Judgment Against Defendant, Lawrence Dugan, by regular United States mail, postage pre-paid, mailed on February 9, 2005 upon the attorney for the Defendant, Patricia Dugan Smith a/k/a Patricia Ann Dugan, who is the only party who has entered an appearance, at the following address:

George W. Westervelt, Jr., Esq.
706 Monroe Street
P.O. Box 549
Stroudsburg, PA 18360-0549



Girard Kasubick, Esquire,
Attorney for Plaintiffs

IN THE COURT

BERKSHIRE COUNTY, PA

LAWRENCE E. HIRC
GWEN A. HIRCHAK,
Plaintiffs

2004-1595-CD

of Case: Quiet
Title Action
of Pleading:
Order of Court
Filed on behalf of:
Plaintiffs
Counsel of Record For
Plaintiffs Party:
Mirard Kasubick, Esq.
Supreme Court #30109
LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651

vs.

PATRICK DUGAN A
a/k/a MARY M. I
KATE DUGAN a/k/
YUON; ANATASIA
ANNA G. FITZGER
DUGAN; GERALD
DUGAN; MARY CO
SMITH; AURELIA
AURELIA VOGLE;
JOSEPH DUGAN;
a/k/a PATRICK
CATHERINE WAD
DUGAN a/k/a P
DUGAN, JR.; S
MARY SUTTON;
a/k/a JULIETT
JOHN DUGAN;
WILLIAM DUGAN
RUTH FLAIG;
EVANOCHKO; M
HELEN DUGAN;
DUGAN; PATRI
CHARLES "CH
DUGAN NEWCO
HEVERLY; RE
ELOISE HILE
MARJORIE KA
SUTTON; JAN
PATRICK DUG
DUGAN, III
MARY RUTH
BOTTINGER;
JOHN DUGAN
KATHLEEN DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,

Defendants

FILED

FEB 10 2005

6/2 0/2:50
William A. Shaw
Prothonotary/Clerk of Courts

1 SENT TO ATT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

: No.: 2004-1595-CD

vs.

: QUIET TITLE ACTION

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;

SCOTT MICHAEL DUGAN; and their :
heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

ORDER OF COURT

NOW, this 10th day of February, 2005, known
Defendant, Lawrence Dugan, having defaulted as set forth
in the Motion for Judgment Against Defendant, Lawrence
Dugan, filed herewith;

IT IS ORDERED AND DECREED that the known Defendant,
Lawrence Dugan, shall file suit in ejectment or otherwise
enter a proceeding to contest the case within thirty (30)
days, or this Order of Court shall become final upon
praecipe by Plaintiffs, which hereby Orders and Decrees
that title to the land subject of this action is vested
absolutely in the Plaintiffs, their heirs and assigns,
free and clear of any and all claims of any nature by the
named Defendant, Lawrence Dugan, his heirs, executors,
administrators, trustees, successors and assigns or by
anyone claiming by, through or under Lawrence Dugan, and
that the Plaintiffs are seized of an indefeasible title to
all those certain three (3) lots situate in Houtzdale
Borough, Clearfield County, Pennsylvania, bounded and
described as follows:

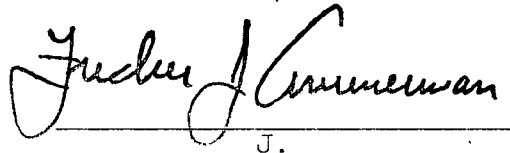
BOUNDED on the North by Bear Alley, on the South by Clara Street, on the East by Harry Street, on the West by Alley.

The said real property described in prior deeds in the chain of title as follows:

BEGINNING at the northwest corner of Harry and Clara Street; thence along Clara Street one hundred and fifty feet (150') to Cedar Alley; thence along Cedar Alley one hundred and fifty feet to Bear Alley; thence along Bear Alley one hundred and fifty feet to Harry Street; thence along Harry Street one hundred and fifty feet (150') to Clara Street, the place of beginning and known as lots Nos. 907, 908 and 909 in the general plan of the Borough of Houtzdale, Pennsylvania.

The above property currently known by Clearfield County Tax Map No. 10-M14-391-35.

BY THE COURT,


J.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
WILLIAM DUGAN; ROSE McCAMLEY;
RUTH FLAIG; HANEY DUGAN; RITA
EVANOCHKO; MARGARET LAWS;
HELEN DUGAN; SARA LENORE
DUGAN; PATRICIA WADE LOBB;
CHARLES "CHUCK" DUGAN; MURIEL
DUGAN NEWCOMBE; ALICE FAYE
HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
administrators, successors,
trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,

Defendants

: No.: 2004-1595-CD
: Type of Case:
: Quiet Title Action
: Type of Pleading:
: Final Praecipe Against
: Certain Defendants
: Filed on behalf of:
: Plaintiffs
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED

FEB 23 2005

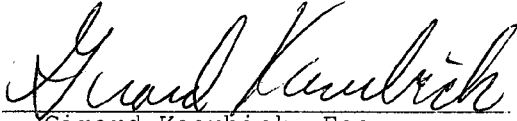
6K 016145/1
William A. Shaw
Prothonotary/Clerk of Courts
No Cmt to file

FINAL PRAECIPE

TO: William A. Shaw, Prothonotary:

Please enter judgment in the above-captioned matter against all named Defendants, except for Lawrence Dugan and Patricia Dugan Smith a/k/a Patricia Ann Dugan, pursuant to the Motion for Default Judgment Against Certain Defendants filed on January 18, 2005 and an Order of Court dated January 18, 2005 in favor of the Plaintiffs.

Dated: February 23, 2005


Girard Kasubick, Esq.
Attorney for Plaintiffs

IN THE CO

DEARFIELD COUNTY, PA

LAWRENCE E. HIRCHAI
GWEN A. HIRCHAI
Plaintiffs

vs.

PATRICK DUGAN;
a/k/a MARY M. DUGAN;
KATE DUGAN a/k/a
YUON; ANATASIA
ANNA G. FITZGERALD
DUGAN; GERALD
DUGAN; MARY COLE
SMITH; AURELIA
AURELIA VOGLE;
JOSEPH DUGAN;
a/k/a PATRICK
CATHERINE WADE,
DUGAN a/k/a PATRICK
DUGAN, JR.; SON
MARY SUTTON; JAMES
a/k/a JULIETTE
JOHN DUGAN; JENNIFER
WILLIAM DUGAN;
RUTH FLAIG; HANNAH
EVANOCHKO; MARY
HELEN DUGAN; SON
DUGAN; PATRICIA
CHARLES "CHUCK"
DUGAN NEWCOMBE
HEVERLY; REBECCA
ELOISE HILE; MARY
MARJORIE KAUFMAN
SUTTON; JAMES
PATRICK DUGAN
DUGAN, III; THOMAS
MARY RUTH CARN
BOTTINGER; PAUL
JOHN DUGAN; LARA
KATHLEEN DUGAN; MICHAEL DUGAN;

LINDA DUGAN KITKO; DANIEL :
DUGAN; PATRICIA DUGAN SMITH :
a/k/a PATRICIA ANN DUGAN; :
TERESA DUGAN; MATTHEW DUGAN; :
MARK DUGAN; TRACY ANN HURTACK; :
SCOTT MICHAEL DUGAN; and their :

: 2004-1595-CD
Name of Case:
Quiet Title Action
Type of Pleading:
Certificate of Readiness
and Praecipe for Trial
Set on behalf of:
Plaintiffs
Counsel of Record For
Defendant's Party:
Girard Kasubick, Esq.
Supreme Court #30109
LEHMAN & KASUBICK
1111 Brisbin Street
Pottsville, PA 16651

FILED No
cc
01:13
MAR 08 2005
William A. Shaw
Prothonotary/Clerk of Courts

heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | IN EQUITY |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |

heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

CERTIFICATE OF READINESS

TO: William A. Shaw, Prothonotary

DATE PRESENTED: March 8 , 2005

CASE NUMBER: 2004-1595-CD

Date Complaint Filed: October 14, 2004

TYPE OF TRIAL REQUESTED:

☐ Jury ☒ Non-Jury ☐ Arbitration

ESTIMATED TRIAL TIME:

1/2 day

PLAINTIFF(S): Lawrence E. Hirschak ☐ Check Block
Gwen A. Hirschak, his wife if a Minor
is a Party
to the Case

DEFENDANT(S): Patricia Dugan Smith ☐
a/k/a Patricia Ann Dugan -
Default Judgment has been
obtained against all other
named Defendants

ADDITIONAL

DEFENDANT(S): None ☐

AMOUNT AT ISSUE: No amount at issue in this Quiet Title
Action case in equity. Plaintiffs
Seeking judgment of good and marketable
Title to real property described in the
Complaint.

CONSOLIDATION: () yes (X) no

DATE CONSOLIDATION ORDERED: N/A

PRAECIPE FOR TRIAL

PLEASE PLACE THE ABOVE CAPTIONED CASE ON THE TRIAL LIST.

I certify that all discovery has been completed by Plaintiffs and Defendant and Plaintiffs assume Defendant is ready for Trial or discovery will be completed, all necessary parties and witnesses are available; serious settlement negotiations have been conducted; there are no outstanding motions; the case is ready in all respects for Trial, and a copy of this Certificate has been served upon all counsel of record and upon all parties of record who are not represented by counsel:

Girard Kasubick, Esq.

611 Brisbin Street

Houtzdale, PA 16651

(814) 378-7840

FOR THE PLAINTIFFS

TELEPHONE NUMBER

George W. Westervelt, Jr., Esq.

706 Monroe Street

P.O. Box 549

Stroudsburg, PA 18360-0549

(570) 421-6100

FOR THE DEFENDANT

TELEPHONE NUMBER

Respectfully Submitted,



Girard Kasubick, Esq.,
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

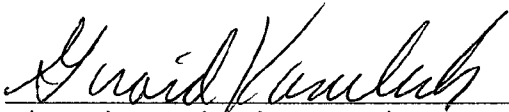
| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |

heirs, executors, :
administrators, successors, :
trustees and assigns, known :
or unknown and any other :
person who may claim title in :
the property subject to this :
action, :
Defendants :

CERTIFICATE OF SERVICE

I, Girard Kasubick, Esq., hereby certify that I served a true and correct copy of the Certificate of Readiness and Praeipce for Trial by United States First Class Mail, postage prepaid, on March 8, 2005, on the following counsel of record:

George W. Westervelt, Jr., Esq.
706 Monroe Street
P.O. Box 549
Stroudsburg, PA 18360-0549


Girard Kasubick, Esquire,
Attorney for Plaintiffs



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK, his wife,
Plaintiffs

vs.

PATRICK DUGAN AND MARY DUGAN
a/k/a MARY M. DUGAN, his wife;
KATE DUGAN a/k/a KATHRYN D.
YUON; ANATASIA DUGAN a/k/a
ANNA G. FITZGERALD; EDWARD L.
DUGAN; GERALD DUGAN; WILLIAM
DUGAN; MARY CORNYN; BERTHA
SMITH; AURELIA VOGEL a/k/a
AURELIA VOGLE; JAMES DUGAN;
JOSEPH DUGAN; PATRICK DUGAN
a/k/a PATRICK C. DUGAN;
CATHERINE WADE; PATRICK C.
DUGAN a/k/a PATRICK C.
DUGAN, JR.; SOPHIA POORMAN;
MARY SUTTON; JULIA WARRICK
a/k/a JULIETTE WARRICK;
JOHN DUGAN; JEROME DUGAN;
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EVANOCHKO; MARGARET LAWS;
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DUGAN; PATRICIA WADE LOBB;
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HEVERLY; REBECCA POORMAN;
ELOISE HILE; MARY OSWALT;
MARJORIE KAUFMAN; ROBERT
SUTTON; JAMES J. DUGAN;
PATRICK DUGAN a/k/a PATRICK
DUGAN, III; THOMAS DUGAN;
MARY RUTH CARNEY; SUE ANN
BOTTINGER; PAUL DUGAN;
JOHN DUGAN; LAWRENCE DUGAN;
KATHLEEN DUGAN; MICHAEL DUGAN;
LINDA DUGAN KITKO; DANIEL
DUGAN; PATRICIA DUGAN SMITH
a/k/a PATRICIA ANN DUGAN;
TERESA DUGAN; MATTHEW DUGAN;
MARK DUGAN; TRACY ANN HURTACK;
SCOTT MICHAEL DUGAN; and their
heirs, executors,
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trustees and assigns, known
or unknown and any other
person who may claim title in
the property subject to this
action,

Defendants

: No.: 2004-1595-CD
: Type of Case:
: Quiet Title Action
: Type of Pleading:
: Final Praecipe Against
: Defendant, Lawrence Dugan
: Filed on behalf of:
: Plaintiffs
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED
01/13/05
MAR 16 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

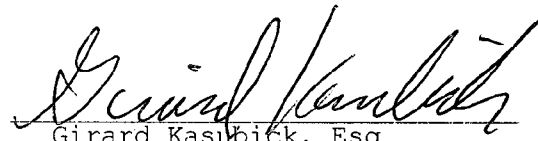
| | | |
|--------------------------------|---|--------------------|
| LAWRENCE E. HIRCHAK and | : | No.: 2004-1595-CD |
| GWEN A. HIRCHAK, his wife, | : | |
| Plaintiffs | : | |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| PATRICK DUGAN AND MARY DUGAN | : | |
| a/k/a MARY M. DUGAN, his wife; | : | |
| KATE DUGAN a/k/a KATHRYN D. | : | |
| YUON; ANATASIA DUGAN a/k/a | : | |
| ANNA G. FITZGERALD; EDWARD L. | : | |
| DUGAN; GERALD DUGAN; WILLIAM | : | |
| DUGAN; MARY CORNYN; BERTHA | : | |
| SMITH; AURELIA VOGEL a/k/a | : | |
| AURELIA VOGLE; JAMES DUGAN; | : | |
| JOSEPH DUGAN; PATRICK DUGAN | : | |
| a/k/a PATRICK C. DUGAN; | : | |
| CATHERINE WADE; PATRICK C. | : | |
| DUGAN a/k/a PATRICK C. | : | |
| DUGAN, JR.; SOPHIA POORMAN; | : | |
| MARY SUTTON; JULIA WARRICK | : | |
| a/k/a JULIETTE WARRICK; | : | |
| JOHN DUGAN; JEROME DUGAN; | : | |
| WILLIAM DUGAN; ROSE McCAMLEY; | : | |
| RUTH FLAIG; HANEY DUGAN; RITA | : | |
| EVANOCHKO; MARGARET LAWS; | : | |
| HELEN DUGAN; SARA LENORE | : | |
| DUGAN; PATRICIA WADE LOBB; | : | |
| CHARLES "CHUCK" DUGAN; MURIEL | : | |
| DUGAN NEWCOMBE; ALICE FAYE | : | |
| HEVERLY; REBECCA POORMAN; | : | |
| ELOISE HILE; MARY OSWALT; | : | |
| MARJORIE KAUFMAN; ROBERT | : | |
| SUTTON; JAMES J. DUGAN; | : | |
| PATRICK DUGAN a/k/a PATRICK | : | |
| DUGAN, III; THOMAS DUGAN; | : | |
| MARY RUTH CARNEY; SUE ANN | : | |
| BOTTINGER; PAUL DUGAN; | : | |
| JOHN DUGAN; LAWRENCE DUGAN; | : | |
| KATHLEEN DUGAN; MICHAEL DUGAN; | : | |
| LINDA DUGAN KITKO; DANIEL | : | |
| DUGAN; PATRICIA DUGAN SMITH | : | |
| a/k/a PATRICIA ANN DUGAN; | : | |
| TERESA DUGAN; MATTHEW DUGAN; | : | |
| MARK DUGAN; TRACY ANN HURTACK; | : | |
| SCOTT MICHAEL DUGAN; and their | : | |
| heirs, executors, | : | |
| administrators, successors, | : | |
| trustees and assigns, known | : | |
| or unknown and any other | : | |
| person who may claim title in | : | |
| the property subject to this | : | |
| action, | : | |
| Defendants | : | |

FINAL PRAECIPE

TO: William A. Shaw, Prothonotary:

Please enter judgment in the above-captioned matter against Defendant, Lawrence Dugan, pursuant to the Motion for Default Judgment Against Defendant, Lawrence Dugan, filed on February 9, 2005 and an Order of Court dated February 10, 2005 in favor of the Plaintiffs.

Dated: March 16, 2005


Girard Kasubick, Esq.
Attorney for Plaintiffs

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

LAWRENCE E. HIRCHAK and
GWEN A. HIRCHAK

V.

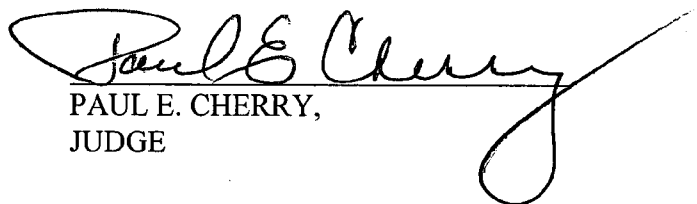
NO. 04-1595-CD

PATRICIA DUGAN SMITH a/k/a
PATRICIA ANN DUGAN

ORDER

AND NOW, this 5th day of April, 2005, the Court having been advised by Girard Kasubick, Esquire, attorney for Plaintiffs, that the parties have reached an agreement, it is the ORDER of the Court that Civil Call in this matter be and is hereby cancelled. It is the further ORDER of this Court that the parties shall file with the Court a Praecipe to Discontinue within fifteen (15) days of this date.

BY THE COURT,


PAUL E. CHERRY,
JUDGE

FILED *01:53 PM* *See list*
APR 05 2005

William A. Shaw
Prothonotary/Clerk of Courts

04-1595-CD
Hirschak vs. Dugan

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Houtzdale, PA 16651

2cc
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