



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

RAYMOND T. SHONCE, JR. AND DEAN  
KLINGER,

TYPE OF PLEADING

Defendants.

CIVIL ACTION-COMPLAINT  
IN EJECTMENT

TO DEFENDANT

FILED ON BEHALF OF PLAINTIFF:  
Pledged Property II, LLC

You are hereby notified to plead  
to the ENCLOSED COMPLAINT WITHIN  
TWENTY (20) DAYS FROM SERVICE HEREOF

  
ATTORNEY FOR PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Joseph A. Fidler, Esquire  
Pa. I.D. #87325

I HEREBY CERTIFY THAT THE ADDRESS  
OF THE PLAINTIFF IS:  
4828 Loop Central Drive  
Houston, TX 77056

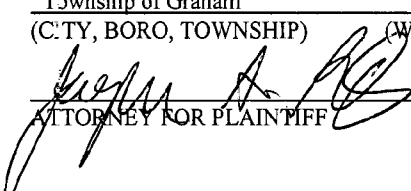
GRENN & BIRSIC, P.C.  
One Gateway Center  
9 West  
Pittsburgh, PA 15222  
(412) 281-7650


AND THE DEFENDANT IS:  
1236 Lower Hollow Road  
Morrisdale, PA 16858

  
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF LOCATION  
I HEREBY CERTIFY THAT THE LOCATION OF THE  
REAL ESTATE AFFECTED BY THIS LIEN IS

Township of Graham  
(CITY, BORO, TOWNSHIP) (WARD)

  
ATTORNEY FOR PLAINTIFF

FILED   
m/12:59/81  
APR 25 2005 8500

William A. Shaw 2ccshf  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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Defendants.

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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.

Lawyer Referral Service  
PA Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
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DEAN KLINGER,

Defendants.

CIVIL ACTION - COMPLAINT IN EJECTMENT

Pledged Property II, LLC, by its attorneys, Grenen & Birsic, P.C., files this Complaint in Ejectment, as follows:

1. Plaintiff is a lending institution duly authorized to conduct business in the Commonwealth of Pennsylvania with a place of business located at 4828 Loop Central Drive, Houston, TX 77056.

2. The Defendant, Raymond T. Shonce, Jr. and Dean Klinger are individual whose last known address is 1236 Lower Hollow Road, Morrisdale, PA 16858.

3. On or about March 4, 2005, the real property and improvements thereon commonly known as 1236 Lower Hollow Road, Morrisdale, PA 16858 (hereinafter "Premises") were sold to Plaintiff pursuant to the Sheriff's Sale in Clearfield County. A true and correct copy of the legal description of said property is marked as Exhibit "A", attached hereto and made a part hereof.

4. At the time of the Sheriff Sale, Defendants were occupying the Premises.

5. Plaintiff, by virtue of said Sheriff's Sale, is the owner of the Premises and therefore right to immediate possession and title to the Premises is in Plaintiff and not in Defendants.

6. On March 23, 2005, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 7, 2005. A true and correct copy of said Notices are marked Exhibit

"B", attached hereto and made a part hereof.

7. Defendants are unjustly and unlawfully occupying, using and enjoying the Premises without right and to the detriment of Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants for possession of the Premises known as 1236 Lower Hollow Road, Morrisdale, PA 16858, together with such other relief as this Honorable Court may deem necessary.

GRENN & BIRSIC, P.C.

BY:

  
Joseph A. Fidler Esquire

PA ID. #87325

Attorneys for Plaintiff

Nine West, One Gateway Center

Pittsburgh, PA 15222

(412) 281-7650

**EXHIBIT A**

*First American Title Insurance Company*

Commitment No. 2045639  
A93451

**SCHEDULE "C"**

**ALL THAT CERTAIN** real property situated in the County of Clearfield, in the State of Pennsylvania, and in the Township of Graham, Pennsylvania.

BEGINNING at an iron pin located on the East right-of-way line of Township Road #695 and further described as 1011.60 feet in a N 85° 02' W direction from an iron rail, which is the Southeast corner of Bruce and Ethel Bock property. Said right-of-way line is 16.5 feet from the center of road. Thence along said Township road South four degrees twenty-four minutes East (S 4° 24' E) one hundred ninety-two and three tenths feet (192.3) to an iron pin located on the East right-of-way line of Twp. Road #695; thence along lands of Marie Kistler, South eighty-five degrees two minutes East (S 85° 02' E) two hundred twenty-nine and fifty-seven hundredths feet (229.57) to an iron pin; thence along lands of Grantors, North four degrees twenty-four minutes West (N. 4° 24' W) one hundred ninety-two and three tenths (192.3) to an iron pin; thence along lands of Bruce and Ethel Bock, North eight-five degrees two minutes West (N 85° 02' W) two hundred twenty-nine and fifty-seven hundredths feet (229.57) to an iron pin and place of beginning.

CONTAINING 1.0 acre.

EXCEPTING AND RESERVING a fifteen foot (15.0) right-of-way from the Township Road #695 right-of-way line through the above mentioned parcel of land to other lands of Grantors.

BEING THE SAME PREMISES WHICH Henry A. Dixon and Maxina Dixon, his wife, by Deed dated 1/28/1993 and recorded 3/9/1993 in the County of Clearfield in Record Book Volume 1517, Page 486 conveyed unto Raymond T. Shonce, Sr. and Ruth O. Shonce, his wife, in fee.

Tax Parcel #116-P9-183

ST/jmt

**EXHIBIT B**



GRENEN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL [JFIDLER@GRENENBIRSIC.COM](mailto:JFIDLER@GRENENBIRSIC.COM)

March 23, 2005

**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED**  
**AND**  
**FIRST CLASS MAIL, POSTAGE PREPAID**

Raymond T. Shonce or  
Current Occupant  
1236 Lower Hollow Road  
Morrisdale, PA 16858

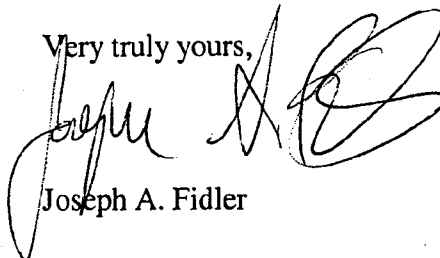
**RE: NOTICE TO VACATE**

Dear Mr. Shonce  
or Current Occupant:

As you may be aware, this firm represents Mortgage Electronic Registration Systems, Inc., in connection with the above-captioned matter. As you may also be aware, Mortgage Electronic Registration Systems, Inc. purchased the property at a sale conducted by the Sheriff of Clearfield County on March 4, 2005. Accordingly, Mortgage Electronic Registration Systems, Inc. is now the record title owner of the property.

Our client has recently informed me that you remain on this property. The purpose of this letter is to notify you that you must vacate the premises on or before fifteen (15) days from the date of this letter. If you fail to vacate the premises on or before that date, Mortgage Electronic Registration Systems, Inc. will institute formal legal action to have you removed from the premises. I trust that such will not be necessary. If you have any questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph A. Fidler", is written over the typed name.

Joseph A. Fidler

GRENEN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL [JFIDLER@GRENENBIRSIC.COM](mailto:JFIDLER@GRENENBIRSIC.COM)

March 23, 2005

**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED**  
**AND**  
**FIRST CLASS MAIL, POSTAGE PREPAID**

Ruth O. Shonce or  
Current Occupant  
1236 Lower Hollow Road  
Morrisdale, PA 16858

**RE: NOTICE TO VACATE**

Dear Mrs. Shonce  
or Current Occupant:

As you may be aware, this firm represents Mortgage Electronic Registration Systems, Inc., in connection with the above-captioned matter. As you may also be aware, Mortgage Electronic Registration Systems, Inc. purchased the property at a sale conducted by the Sheriff of Clearfield County on March 4, 2005. Accordingly, Mortgage Electronic Registration Systems, Inc. is now the record title owner of the property.

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Very truly yours,

  
Joseph A. Fidler

**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.

Article Addressed to:

34th O. Shonce or  
current occupant  
1236 Lower Hollow Road  
Morrisdale, PA 16858

Article Number

(Transfer from service label)

7004 2510 0001 3345 6317

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Dean Klingler* ☐ Agent ☒ Addressee

B. Received by (Printed Name)

*Dean Klingler*

C. Date of Delivery

*4-4-05*

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

**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.

Article Addressed to:

Raymond T. Shonce  
or current occupant  
236 Lower Hollow Road  
Morrisdale, PA 16858

Article Number

(Transfer from service label)

7004 2510 0001 3345 6324

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Dean Klingler* ☐ Agent ☒ Addressee

B. Received by (Printed Name)

*Dean Klingler*

C. Date of Delivery

*4-4-05*

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

U.S. POSTAL SERVICE CERTIFICATE OF MAILING

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER

Received From:

Grenen & Birsic, P.C.  
One Gateway Center, Nine West  
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:

Ruth O. Shonce or Current OCC  
1236 Lower Hollow Road  
Morrisdale, PA 16858

PA 15222 MAR 23 2005

90

PS Form 3817, January 2001

U.S. POSTAL SERVICE CERTIFICATE OF MAILING

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER

Received From:

Grenen & Birsic, P.C.  
One Gateway Center, Nine West  
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One piece of ordinary mail addressed to:

Raymond T. Shonce or Current OCC  
1236 Lower Hollow Road  
Morrisdale, PA 16858

PA 15222 MAR 23 2005

90

PS Form 3817, January 2001

U.S. Postal Service<sup>TM</sup>

**CERTIFIED MAIL<sup>TM</sup> RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	4.42

Postmark Here

Sent To

Ruth O. Shonce or Current OCC  
Street, Apt. No., or PO Box No. 1236 Lower Hollow Road  
City, State, ZIP+4 Morrisdale, PA 16858

U.S. Postal Service<sup>TM</sup>

**CERTIFIED MAIL<sup>TM</sup> RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

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Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	4.42

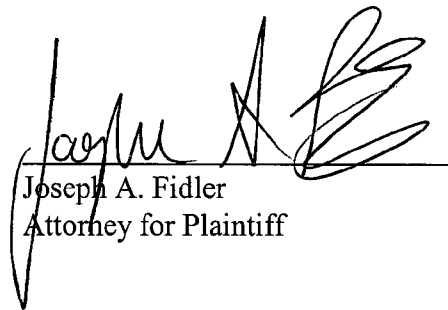
Postmark Here

Sent To

Raymond T. Shonce or Current OCC  
Street, Apt. No., or PO Box No. 1236 Lower Hollow Road  
City, State, ZIP+4 Morrisdale, PA 16858

VERIFICATION

Joseph A. Fidler, attorney for Pledged Property II, LLC, deposes and says subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities that the facts set forth in the foregoing Complaint in Ejectment are true and correct to his information and belief.



Joseph A. Fidler  
Attorney for Plaintiff

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Service # 1 of 2 Services

Sheriff Docket # **100425**

PLEDGED PROPERTY II, LLC

Case # 05-591-CD

vs.

RAYMOND T. SHONCE, JR. and DEAN KLINGER

**SHERIFF RETURNS**

NOW April 29, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO RAYMOND T. SHONCE, JR., DEFENDANT. WHEREABOUTS UNKNOWN.

SERVED BY: /

ce **FILED**  
0/2:39/01  
MAY 02 2005

William A. Shaw  
Prothonotary/Clerk of Courts

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

DOCKET # 100425  
NO: 05-591-CD  
SERVICE # 2 OF 2  
COMPLAINT IN EJECTMENT

PLAINTIFF: PLEDGED PROPERTY II, LLC  
vs.  
DEFENDANT: RAYMOND T. SHONCE, JR. and DEAN KLINGER

**SHERIFF RETURN**

---

NOW, April 27, 2005 AT 9:00 AM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON DEAN KLINGER DEFENDANT AT 1236 LOWER HOLLOW ROAD, MORRISDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEAN KLINGER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100425  
NO: 05-591-CD  
SERVICES 2  
COMPLAINT IN EJECTMENT

PLAINTIFF: PLEDGED PROPERTY II, LLC  
vs.  
DEFENDANT: RAYMOND T. SHONCE, JR. and DEAN KLINGER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GRENN	99555	20.00
SHERIFF HAWKINS	GRENN	99555	35.53

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2005

So Answers,


Chester A. Hawkins  
Sheriff



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

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ATTORNEY FOR PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

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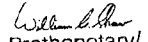
Township of Graham  
(CITY, BORO, TOWNSHIP) (WARD)

  
ATTORNEY FOR PLAINTIFF

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

APR 25 2005

Attest.

  
Prothonotary/  
Clerk of Courts

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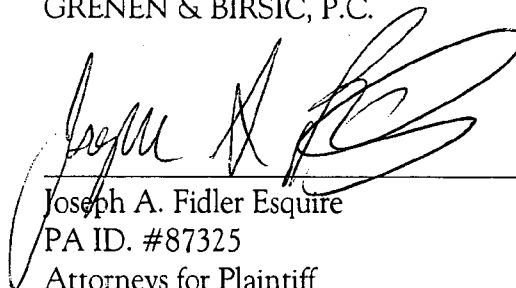
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WHEREFORE, Plaintiff demands judgment against Defendants for possession of the Premises known as 1236 Lower Hollow Road, Morrisdale, PA 16858, together with such other relief as this Honorable Court may deem necessary.

GRENN & BIRSIC, P.C.

BY:

A handwritten signature in black ink, appearing to read 'Joseph A. Fidler', is written over a horizontal line.

Joseph A. Fidler Esquire  
PA ID. #87325

Attorneys for Plaintiff  
Nine West, One Gateway Center  
Pittsburgh, PA 15222  
(412) 281-7650

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ST/jmt

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GRENNEN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL [JFIDLER@GRENNENBIRSIC.COM](mailto:JFIDLER@GRENNENBIRSIC.COM)

March 23, 2005

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**FIRST CLASS MAIL, POSTAGE PREPAID**

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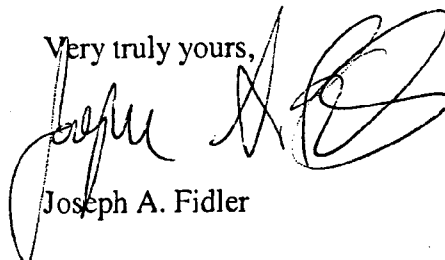
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Very truly yours,

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Joseph A. Fidler



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ATTORNEYS AT LAW  
ONE GATEWAY CENTER  
NINE WEST  
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EMAIL [FIDLER@GRENENBIRSIC.COM](mailto:FIDLER@GRENENBIRSIC.COM)

March 23, 2005

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or Current Occupant:

As you may be aware, this firm represents Mortgage Electronic Registration Systems, Inc., in connection with the above-captioned matter. As you may also be aware, Mortgage Electronic Registration Systems, Inc. purchased the property at a sale conducted by the Sheriff of Clearfield County on March 4, 2005. Accordingly, Mortgage Electronic Registration Systems, Inc. is now the record title owner of the property.

Our client has recently informed me that you remain on this property. The purpose of this letter is to notify you that you must vacate the premises on or before fifteen (15) days from the date of this letter. If you fail to vacate the premises on or before that date, Mortgage Electronic Registration Systems, Inc. will institute formal legal action to have you removed from the premises. I trust that such will not be necessary. If you have any questions, please feel free to contact me.

Very truly yours,

  
Joseph A. Fidler

**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.

Article Addressed to:

Attn O. Shonce or  
current occupant  
236 Lower Hollow Road  
Warrisdale, PA 16858

Article Number

(Transfer from service label)

7004 2510 0001 3345 6317

Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

Dean Klingler

☐ Agent

☒ Addressee

B. Received by (Printed Name)

Dean Klingler

C. Date of Delivery

4-4-05

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

**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.

Article Addressed to:

Raymond T. Shonce  
current occupant  
236 Lower Hollow Road  
Warrisdale, PA 16858

Article Number

(Transfer from service label)

7004 2510 0001 3345 6324

Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

Dean Klingler

☐ Agent

☒ Addressee

B. Received by (Printed Name)

Dean Klingler

C. Date of Delivery

4-4-05

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

U.S. POSTAL SERVICE CERTIFICATE OF MAILING

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL DOES NOT PROVIDE FOR INSURANCE-POSTMASTER

Received From:

Grenen & Birsic, P.C.  
One Gateway Center, Nine West  
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:

Ruth O. Shance or Current Occ  
1236 Lower Hollow Road  
Morrisdale, PA 16858

PA 15222 45205  
9.00  
CG 821-177

Form 3817, January 2001

U.S. POSTAL SERVICE CERTIFICATE OF MAILING

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL DOES NOT PROVIDE FOR INSURANCE-POSTMASTER

Received From:

Grenen & Birsic, P.C.  
One Gateway Center, Nine West  
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:

Raymond T. Shance or Current Occ  
1236 Lower Hollow Road  
Morrisdale, PA 16858

PA 15222 45205  
9.00  
CG

PS Form 3817, January 2001

U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 4.42	

Sent To:  
Ruth O. Shance or Current OCC  
Street, Apt. No.,  
or PO Box No. 1236 Lower Hollow Road  
City, State, ZIP+4  
Morrisdale, PA 16858

U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

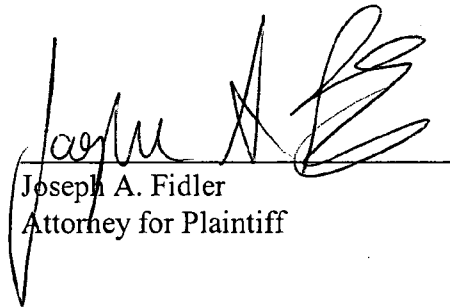
OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 4.42	

Sent To:  
Raymond T. Shance or Current OCC  
Street, Apt. No.,  
or PO Box No. 1236 Lower Hollow Road  
City, State, ZIP+4  
Morrisdale, PA 16858

VERIFICATION

Joseph A. Fidler, attorney for Pledged Property II, LLC, deposes and says subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities that the facts set forth in the foregoing Complaint in Ejectment are true and correct to his information and belief.



Joseph A. Fidler  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

ISSUE NUMBER:

vs.

RAYMOND T. SHONCE, JR. AND  
DEAN KLINGER,

NO.: 05-591-CD

Defendants.

TYPE OF PLEADING:

PRAECIPE TO SETTLE AND  
DISCONTINUE WITHOUT  
PREJUDICE AGAINST RAYMOND T.  
SHONCE, JR. ONLY

CODE -

FILED ON BEHALF OF PLAINTIFF:  
Pledged Property II, LLC

COUNSEL OF RECORD FOR THIS  
PARTY:

Joseph A. Fidler, Esquire  
Pa. I.D. #87325

GRENN & BIRSIC, P.C.  
One Gateway Center  
Ninth Floor  
Pittsburgh, PA 15222  
(412) 281-7650

FILED <sup>62</sup>  
m13:21871  
MAY 05 2005

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

RAYMOND T. SHONCE, JR. AND  
DEAN KLINGER,

Defendants.

PRAECIPE TO SETTLE AND DISCONTINUE  
WITHOUT PREJUDICE AGAINST RAYMOND T. SHONCE, JR ONLY

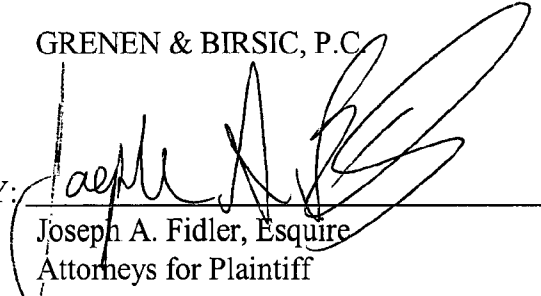
TO: PROTHONOTARY

SIR:

Kindly settle and discontinue without prejudice the above-captioned matter and mark the  
docket accordingly.

GRENN & BIRSIC, P.C.

BY:

  
Joseph A. Fidler, Esquire  
Attorneys for Plaintiff

Sworn to and subscribed before me

this 3rd day of May, 2005.



Notary Public  
COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Patricia A. Townsend, Notary Public  
City Of Pittsburgh, Allegheny County  
My Commission Expires June 2, 2007

Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

TYPE OF PLEADING:

RAYMOND T. SHONCE, JR. and  
DEAN KLINGER,

PRAECIPE FOR DEFAULT JUDGMENT  
(Ejectment) AGAINST DEAN KLINGER  
ONLY

Defendants.

FILED ON BEHALF OF PLAINTIFF:  
Pledged Property II, LLC

COUNSEL OF RECORD FOR THIS  
PARTY:

Joseph A. Fidler, Esquire  
Pa. I.D. #87325

GRENNEN & BIRSIC, P.C.

One Gateway Center  
Ninth Floor  
Pittsburgh, PA 15222

(412) 281-7650

**FILED** *Att. pd. 20.00*  
*m/ 3:45 PM* *Notice to Def.*  
JUN 06 2005 *Statement*  
William A. Shaw *No Statement*  
Prothonotary/Clerk of Courts *(Ejectment)*  
*No CC*  
*GA*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

RAYMOND T. SHONCE, JR. and  
DEAN KLINGER,

Defendants.

PRAECIPE FOR DEFAULT JUDGMENT IN EJECTMENT  
AGAINST DEAN KLINGER ONLY

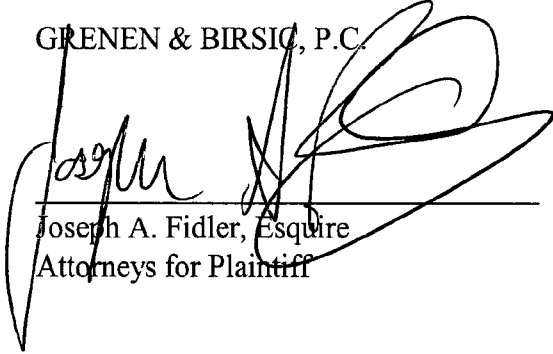
TO: PROTHONOTARY

SIR/MADAM:

Please enter a default judgment in the ejectment against Defendant, Dean Klinger for possession of the premises known as 1236 Lower Hollow Road, Morrisdale, PA 16858.

GREENEN & BIRSIC, P.C.

BY:

  
\_\_\_\_\_  
Joseph A. Fidler, Esquire  
Attorneys for Plaintiff



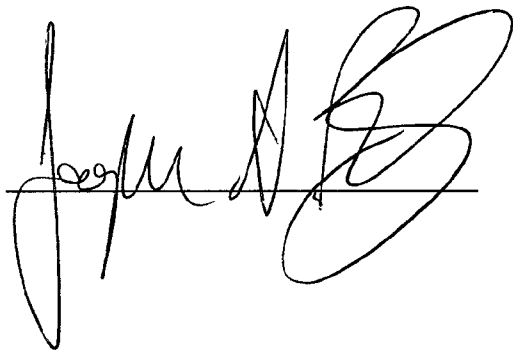
AFFIDAVIT OF NON-MILITARY SERVICE  
AND CERTIFICATE OF MAILING OF NOTICE OF  
INTENT TO TAKE DEFAULT JUDGMENT

COMMONWEALTH OF PENNSYLVANIA

SS:

COUNTY OF ALLEGHENY

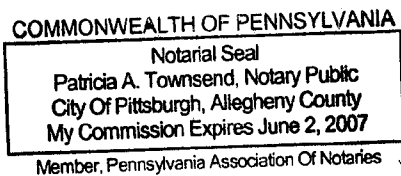
Before me, the undersigned authority, a Notary Public in and for said County and Commonwealth, personally appeared Joseph A. Fidler, attorney for and authorized representative of Plaintiff who, being duly sworn according to law, deposes and says that the Defendant is not in the military service of the United States of America to the best of his knowledge, information and belief and certifies that the Notices of Intent to take Default Judgment were mailed in accordance with Pa. R.C.P. 237.1, as evidenced by the attached copies.



Sworn to and subscribed before me

this 31<sup>st</sup> day of May, 2005.

  
Notary Public



PLEDGED PROPERTY II, LLC, ) CIVIL DIVISION  
)  
Plaintiff, ) NO.: 05-591-CD  
vs. )  
)  
RAYMOND T. SHONCE, JR. AND )  
DEAN KLINGER, )  
)  
Defendants. )

TO: Dean Klinger  
1236 Lower Hollow Road  
Morrisdale, PA 16858

DATE OF NOTICE: May 18, 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 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 NOTICE TO A 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.

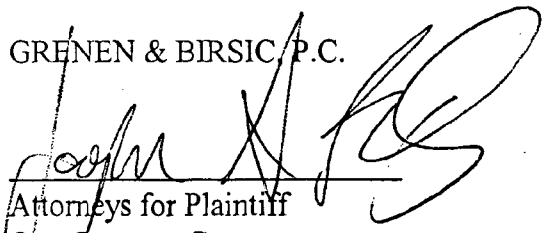
IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**LAWYER REFERRAL SERVICE**

PA Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

By:

GRENNEN & BIRSIC, P.C.

  
Attorneys for Plaintiff  
One Gateway Center  
Nine West  
Pittsburgh, PA 15222  
(412) 281-7650

FIRST CLASS MAIL, POSTAGE PREPAID

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

PLEDGED PROPERTY II, LLC,

Plaintiff,

NO.: 05-591-CD

vs.

RAYMOND T. SHONCE, JR. and  
DEAN KLINGER,

Defendants.

NOTICE OF ORDER, DECREE OR JUDGMENT

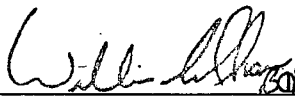
TO: Dean Klinger  
1236 Lower Hollow Road  
Morrisdale, PA 16858

( ) Plaintiff  
(XXX) Defendant  
( ) Additional Defendant

You are hereby notified that an Order, Decree or  
Judgment was entered in the above captioned proceeding  
on June 6, 2005.

( ) A copy of the Order or Decree is enclosed,  
or  
(XXX) The judgment is as follows:

in ejectment for possession of the premises known as 1236 Lower Hollow Road, Morrisdale, PA  
16858.

  
Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

Plaintiff,

vs.

RAYMOND T. SHONCE, JR. and  
DEAN KLINGER,

Defendant.

CIVIL DIVISION

NO.: 05-591-CD

ISSUE NUMBER:

TYPE OF PLEADING:

**Praecipe for Writ of Possession  
Against Dean Klinger only**

CODE-

FILED ON BEHALF OF  
PLAINTIFF:

Pledged Property II, LLC

COUNSEL OF RECORD FOR  
THIS PARTY:

Joseph A. Fidler, Esquire  
Pa. I.D. #87325

GRENNEN & BIRSIC, P.C.

One Gateway Center  
Nine West  
Pittsburgh, PA 15222  
(412) 281-7650

FILED *Atty pd.*  
*m) 10:30 AM* *20.00*  
JUN 13 2005 *icc & 6 writs*  
*to Shff*  
William A. Shaw  
Prothonotary/Clerk of Courts *62*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

RAYMOND T. SHONCE, JR. and  
DEAN KLINGER,

Defendant.

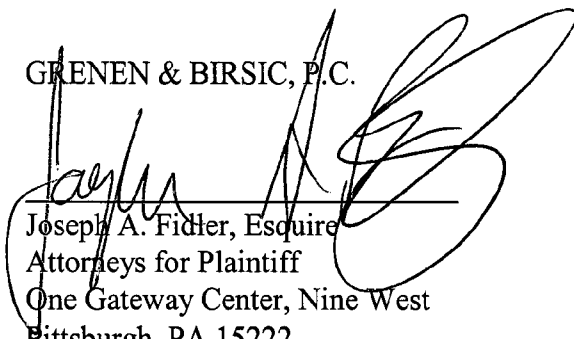
PRAECIPE FOR WRIT OF POSSESSION

TO: PROTHONOTARY

Kindly issue a Writ of Possession in the above-captioned matter for the premises known as 1236 Lower Hollow Road located in the Township of Graham, County of Clearfield, Pennsylvania and more particularly described in Plaintiff's Complaint in Ejectment filed in the instant proceeding.

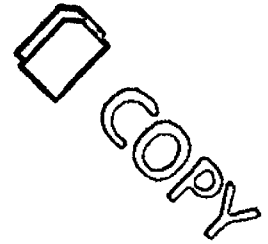
GREENEN & BIRSIC, P.C.

BY:

  
\_\_\_\_\_  
Joseph A. Fidler, Esquire  
Attorneys for Plaintiff  
One Gateway Center, Nine West  
Pittsburgh, PA 15222  
(412) 281-7650

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

WRIT OF POSSESSION

COPY

**Pledged Property II, LLC**

**Plaintiff(s)**

**Vs.**

**NO.: 2005-00591-CD**

**Raymond T. Shonce Jr.  
Dean Klinger**

**Defendant(s)**

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Pledged Property II, LLC

1236 Lower Hollow Road located in the Township of Graham, Clearfield County,  
Pennsylvania

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.

\_\_\_\_\_  
William A. Shaw, Prothonotary

Received writ this \_\_\_\_\_ day of  
\_\_\_\_\_ A.D. \_\_\_\_\_  
at \_\_\_\_\_ a.m./p.m.

\_\_\_\_\_  
Sheriff

REQUESTING PARTY NAME:  
ATTORNEY FILING: Joseph A. Fidler, Esq.  
(412) 281-7650

# In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **100551**

PLEDGED PROPERTY II, LLC

Case # 05-591-CD

vs.

RAYMOND T. SHONCE JR. and DEAN KLINGER

## SHERIFF RETURNS

NOW June 16, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN WRIT OF POSSESSION "NOT FOUND" AS TO DEAN KLINGER, DEFENDANT. 1238 LOWER HOLLOW RD., MORRISDALE, PA. "EMPTY"..

SERVED BY: /

## Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	GRENNEN	100973	10.00
SHERIFF HAWKINS	GRENNEN	100973	24.53

Sworn to Before me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2005

So Answers,

  
Chester A. Hawkins  
Sheriff

**FILED**

JUN 17 2005 (62)  
1:40 p.m. 62

William A. Shaw  
Prothonotary

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

WRIT OF POSSESSION

**Pledged Property II, LLC**

**Plaintiff(s)**

**Vs.**

**NO.: 2005-00591-CD**

**Raymond T. Shonce Jr.  
Dean Klinger**

**Defendant(s)**

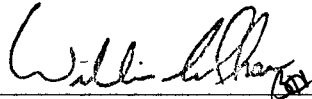
COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Pledged Property II, LLC

1236 Lower Hollow Road located in the Township of Graham, Clearfield County,  
Pennsylvania

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

Received writ this 13 day of  
June A.D. 2005  
at 2:30 a.m. (p.m.)  
Chester A. Kuehner by Maury Ham  
Sheriff

REQUESTING PARTY NAME:

ATTORNEY FILING: Joseph A. Fidler, Esq.  
(412) 281-7650



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

WRIT OF POSSESSION

Pledged Property II, LLC

Plaintiff(s)

Vs.

NO.: 2005-00591-CD

Raymond T. Shonce Jr.  
Dean Klinger

Defendant(s)

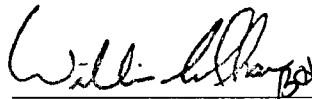
COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Pledged Property II, LLC

1236 Lower Hollow Road located in the Township of Graham, Clearfield County,  
Pennsylvania

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.



William A. Shaw, Prothonotary

Received writ this 13 day of  
June A.D. 2005  
at 2:30 a.m. (p.m.)  
Chester A. Hawcharley Maultz Horn  
Sheriff

REQUESTING PARTY NAME:

ATTORNEY FILING: Joseph A. Fidler, Esq.  
(412) 281-7650

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

WRIT OF POSSESSION

Pledged Property II, LLC

Plaintiff(s)

Vs.

NO.: 2005-00591-CD

Raymond T. Shonce Jr.  
Dean Klinger

Defendant(s)

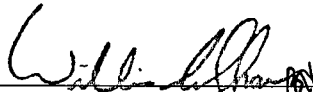
COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Pledged Property II, LLC

1236 Lower Hollow Road located in the Township of Graham, Clearfield County,  
Pennsylvania

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

Received writ this 13 day of  
June A.D. 2005  
at 2:30 a.m./p.m.  
Chester A. Hawley by Mark H. Hark  
Sheriff

REQUESTING PARTY NAME:

ATTORNEY FILING: Joseph A. Fidler, Esq.  
(412) 281-7650

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

WRIT OF POSSESSION

Pledged Property II, LLC

Plaintiff(s)

Vs.

NO.: 2005-00591-CD

Raymond T. Shonce Jr.  
Dean Klinger

Defendant(s)

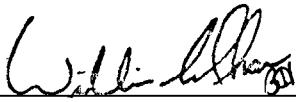
COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

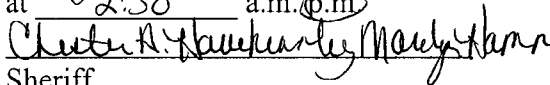
To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Pledged Property II, LLC

1236 Lower Hollow Road located in the Township of Graham, Clearfield County,  
Pennsylvania

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

Received writ this 13 day of  
June A.D. 2005  
at 2:30 a.m. (p.m.)  
  
Sheriff

REQUESTING PARTY NAME:

ATTORNEY FILING: Joseph A. Fidler, Esq.  
(412) 281-7650

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

WRIT OF POSSESSION

Pledged Property II, LLC

Plaintiff(s)

Vs.

NO.: 2005-00591-CD

Raymond T. Shonce Jr.  
Dean Klinger

Defendant(s)

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Pledged Property II, LLC

1236 Lower Hollow Road located in the Township of Graham, Clearfield County,  
Pennsylvania

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.



William A. Shaw, Prothonotary

Received writ this 13 day of  
June A.D. 2005

at 2:30 a.m./p.m.

Chester A. Hunkeler by Mary G. Hunkeler  
Sheriff

REQUESTING PARTY NAME:

ATTORNEY FILING: Joseph A. Fidler, Esq.  
(412) 281-7650

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

ISSUE NUMBER:

vs.

RAYMOND T. SHONCE, JR. AND  
DEAN KLINGER,

NO.: 05-591-CD

Defendants.

TYPE OF PLEADING:

PRAECIPE TO SETTLE AND  
DISCONTINUE WITHOUT  
PREJUDICE

CODE -

FILED ON BEHALF OF PLAINTIFF:  
Pledged Property II, LLC

COUNSEL OF RECORD FOR THIS  
PARTY:

Joseph A. Fidler, Esquire  
Pa. I.D. #87325

GRENN & BIRSIC, P.C.  
One Gateway Center  
Ninth Floor  
Pittsburgh, PA 15222  
(412) 281-7650

FILED *no cc*  
*m/a: 18/6/05*  
JUN 28 2005 *Cert. of Disc.*  
*to Aug*  
William A. Shaw  
Prothonotary/Clerk of Court *copy to CIA*  
*64*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

RAYMOND T. SHONCE, JR. AND  
DEAN KLINGER,

Defendants.

PRAECIPE TO SETTLE AND DISCONTINUE  
WITHOUT PREJUDICE

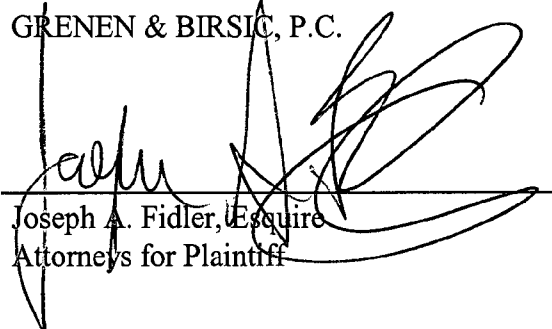
TO: PROTHONOTARY

SIR:

Kindly settle and discontinue without prejudice the above-captioned matter and mark the docket accordingly.

GRENN & BIRSIC, P.C.

BY:

  
Joseph A. Fidler, Esquire  
Attorneys for Plaintiff

Sworn to and subscribed before me

this 23rd day of June, 2005.



Notary Public

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Patricia A. Townsend, Notary Public  
City Of Pittsburgh, Allegheny County  
My Commission Expires June 2, 2007  
Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Pledged Property II, LLC

Vs.

No. 2005-00591-CD

Raymond T. Shonce Jr.  
Dean Klinger

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on June 28, 2005, marked:

Settled and Discontinued without Prejudice

Record costs in the sum of \$125.00 have been paid in full by Joseph A. Fidler, Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 28th day of June A.D. 2005.

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William A. Shaw, Prothonotary

COPY