

05-591-CD

Pledged Property vs. R. Shonce et al

Pledged Property v. Raymond Shonce et al
2005-591-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

vs.

RAYMOND T. SHONCE, JR. AND DEAN
KLINGER,

Defendants.

NO.: 05-591-CD

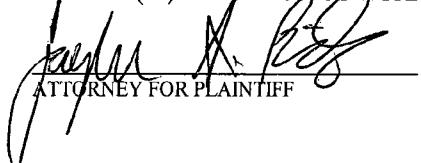
TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

TO DEFENDANT

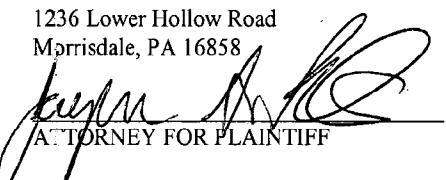
FILED ON BEHALF OF PLAINTIFF:
Pledged Property II, LLC

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


ATTORNEY FOR PLAINTIFF

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

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


ATTORNEY FOR PLAINTIFF

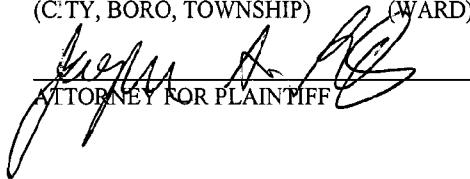
COUNSEL OF RECORD FOR THIS
PARTY:

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

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

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/12/59/05 Atty 85.00
APR 25 2005

William A. Shaw 2CCShff
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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CIVIL DIVISION
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Plaintiff,

vs.

RAYMOND T. SHONCE, JR. AND
DEAN KLINGER,

Defendants.

NOTICE TO DEFEND

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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

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

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NO.:

Plaintiff,

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RAYMOND T. SHONCE, JR. AND
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

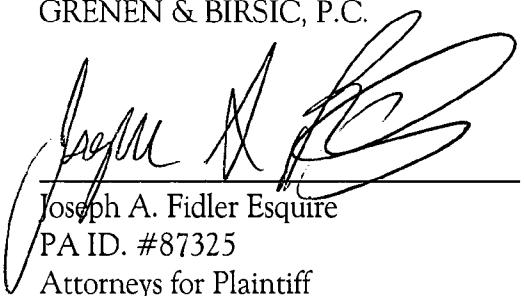
"B", attached hereto and made a part hereof.

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.

GRENEN & 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 in 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 & BIRSIĆ, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL JFIDLER@GRENENBIRSIĆ.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

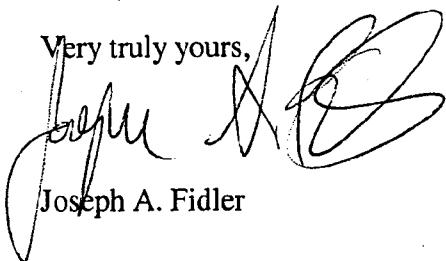
RE: NOTICE TO VACATE

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,



Joseph A. Fidler

GRENEN & BIRSCIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL JFIDLER@GRENNENBIRSCIC.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

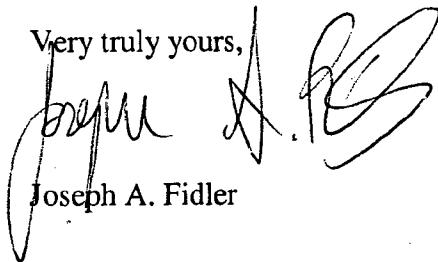
RE: NOTICE TO VACATE

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.

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:

Ruth O. Shonce or
current occupant
1236 Lower Hollow Road
Morristown, NJ 07958

Article Number
(Transfer from service label) **7004 2510 0001 3345 6317**

S Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature


 Agent
 Addressee

B. Received by (Printed Name)

Dean Klinger

C. Date of Delivery

4-4-05

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

3. Service Type

| | |
|---|--|
| <input type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> 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
1236 Lower Hollow Road
Morristown, NJ 07958

Article Number
(Transfer from service label)**7004 2510 0001 3345 6324**

S Form 3811, February 2004

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature


 Agent
 Addressee

B. Received by (Printed Name)

Dean Klinger

C. Date of Delivery

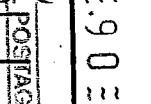
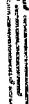
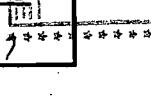
4-4-05

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

3. Service Type

| | |
|---|--|
| <input type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input checked="" type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> 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 APPLY FOR INSURANCE-POSTMASTER | | | |
| Received From: | | | |
| <p><u>Grenen & Birsic, P.C.</u> <u>One Gateway Center, Nine West</u> <u>Pittsburgh, PA 15222</u></p> | | | |
| <p>One piece of ordinary mail addressed to:</p> <p><u>Ruth O. Shance or Seventy</u> <u>(236 Lower Hollow Road</u> <u>Morrisdale, Pa. 16858</u></p> | | | |
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SF Form 3817, January 2001

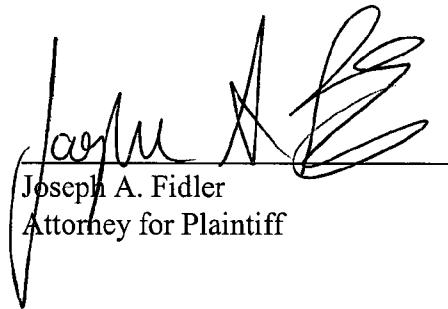
PS Form 3817, January 2001

| | | |
|---|--|--|
| U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i> | | |
| <input checked="" type="checkbox"/> For delivery information visit our website at www.usps.com | | |
| OFFICIAL USE | | |
| Postage Certified Fee Return Receipt Fee (Endorsement Required) Restricted Delivery Fee (Endorsement Required) Total Postage & Fees | \$ <hr/> <hr/> <hr/> <hr/> <hr/> | |
| | Postmark Here | |
| | \$ 4.42 | |
| | <input checked="" type="checkbox"/> Sent To | |
| | Ruth O. Snance or Current OCC Street, Apt. No.; or PO Box No. City, State, ZIP+4 1236 Lower Hollow Road Morrisdale, PA. 16858 | |

| | | |
|--|--|------------------|
| U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i> | | |
| <input checked="" type="checkbox"/> For delivery information visit our website at 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 PC Box No. 1234 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: /

FILED
012-3901
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 | GRENEN | 99555 | 20.00 |
| SHERIFF HAWKINS | GRENEN | 99555 | 35.53 |

Sworn to Before Me This

So Answers,

____ Day of _____ 2005



Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

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CIVIL DIVISION

Plaintiff,

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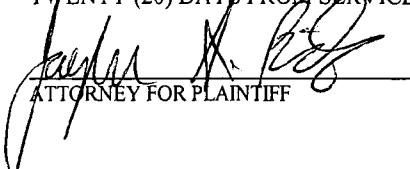
NO.: 05-591-CJ

TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

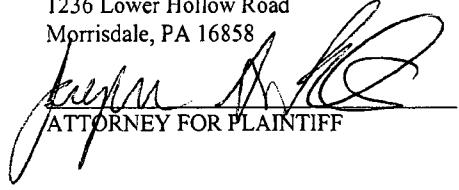
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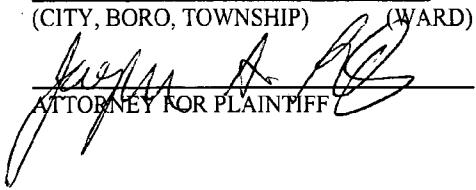
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Pledged Property II, LLC

COUNSEL OF RECORD FOR THIS
PARTY:

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

GRENEN & BIRSIC, P.C.
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Pittsburgh, PA 15222
(412) 281-7650

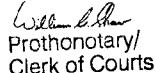
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I HEREBY CERTIFY THAT THE LOCATION OF THE
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(CITY, BORO, TOWNSHIP) WARD

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION
NO.:

Plaintiff,

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Lawyer Referral Service
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Pennsylvania Bar Association
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GRENEN & 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"

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Tax Parcel #116-P9-183

ST/jmt

EXHIBIT B

GRENEN & BIRSIĆ, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657

EMAIL JFIDLER@GRENENBIRSIJC.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

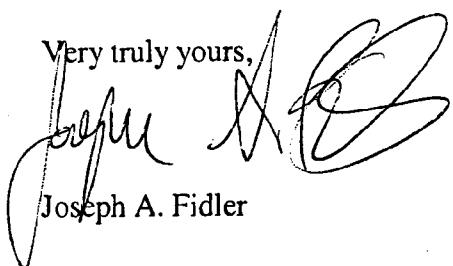
RE: NOTICE TO VACATE

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,



Joseph A. Fidler

GRENEN & BIRSCIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657

EMAIL JFIDLER@GRENNENBIRSCIC.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

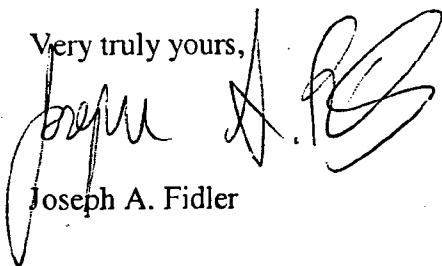
RE: NOTICE TO VACATE

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.

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

ENDER: 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:

uth O. Shonce or
urrent occupant
236 Lower Hollow Road
Orriisdale, PA. 14858

Article Number

(Transfer from service label)

7004 2510 0001 3345 6317

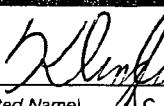
Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X  Agent
 Addressee

B. Received by (Printed Name)

Dean Klinger 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

ENDER: 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:

aymond T. Shonce
urrent occupant
236 Lower Hollow Road
Orriisdale, PA. 14858

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  Agent
 Addressee

B. Received by (Printed Name)

Dean Klinger 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

| | | |
|--|----------------|------------------------|
| 5 | POSTAL SERVICE | CERTIFICATE OF MAILING |
| BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT APPLY FOR INSURANCE-POSTMASTER | | |
| Received From | | PA |
| <p><u>Grenen & Birsic, P.C.</u> <u>One Gateway Center, Nine West</u> <u>Pittsburgh, PA 15222</u></p> | | |
| <p>One piece of ordinary mail addressed to:</p> <p><u>Ruth O. Shantz or Current</u> <u>1236 Lower Hollow Road</u> <u>Morrисdale, Pa. 16858</u></p> | | |
| | | POSTAGE PAID |
| <p>PA 821-177**</p> | | |

Form 3817, January 2001

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
OFFICIAL USE

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

Send To
Kathy O'Shane or Current OCC
Street, Apt. No.
or PO Box No. 1236 Lower Hollow Road
City, State, ZIP 16858
Morrisondale, PA.

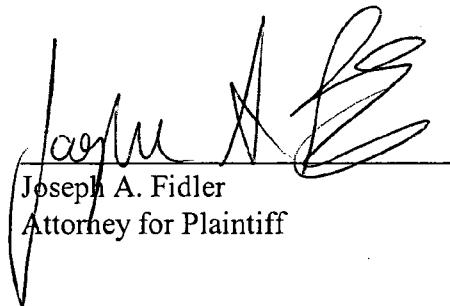
The image shows the official logo for U.S. Postal Service Certified Mail. It features the text "U.S. Postal Service™" at the top, "CERTIFIED MAIL™ RECEIPT" in large, bold, serif letters in the center, and the subtext "(Domestic Mail Only; No Insurance Coverage Provided)" in a smaller, italicized, serif font below. The entire logo is enclosed in a decorative border with a repeating pattern of small circles and dots. The background of the logo is white, and the text is in black or dark blue.

| | | |
|---|---------|------------------|
| Postage | \$ | |
| Certified Fee | | |
| Return Receipt Fee (Endorsement Required) | | Postmark Here |
| Restricted Delivery Fee (Endorsement Required) | | |
| Total Postage & Fees | \$ 4.47 | |

Ben To: **Raymond T. Shonc or Current occ**
Street, Apt. No.: **1236 Lower Hollow Road**
or PO Box No.
City, State, ZIP+4 **Marshall 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

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

FILED *6/13/2005*
NO CC
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,

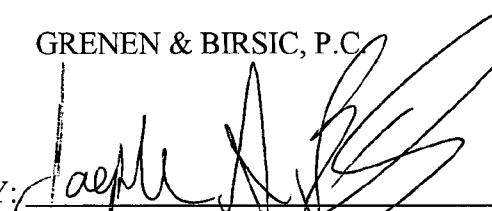
Defendants.

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.

GRENEN & BIRSCIC, 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.

RAYMOND T. SHONCE, JR. and
DEAN KLINGER,

Defendants.

TYPE OF PLEADING:

PRAECIPE FOR DEFAULT JUDGMENT
(Ejectment) AGAINST DEAN KLINGER
ONLY

FILED ON BEHALF OF PLAINTIFF:
Pledged Property II, LLC

COUNSEL OF RECORD FOR THIS
PARTY:

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

GRENEN & BIRSIC, P.C.

One Gateway Center
Ninth Floor
Pittsburgh, PA 15222

(412) 281-7650

FILED *Atyp pd. 20.00*
m 3:45pm Notice to Def.
JUN 06 2005 *Shaw*
No Statement
(Ejectment)

William A. Shaw
Prothonotary/Clerk of Courts

No CC

(68)

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.

BY:

GRENNEN & BIRSID, P.C.

Joseph A. Fidler, Esquire
Attorneys for Plaintiff

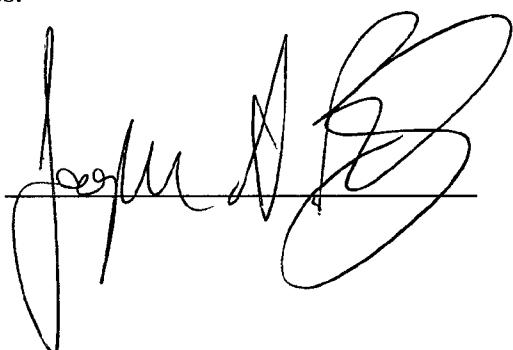
AFFIDAVIT OF NON-MILITARY SERVICE
AND CERTIFICATE OF MAILING OF NOTICE OF
INTENT TO TAKE DEFAULT JUDGMENT

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 ~~st~~ 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
vs.)
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:

GRENEN & BIRSIC, P.C.
John H. Birsic
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



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 16, 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.

Willie H. Hayes
Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PLEDGED PROPERTY II, LLC,

CIVIL DIVISION

Plaintiff,

NO.: 05-591-CD

vs.

ISSUE NUMBER:

RAYMOND T. SHONCE, JR. and
DEAN KLINGER,

TYPE OF PLEADING:
**Praeclipe for Writ of Possession
Against Dean Klinger only**

Defendant.

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.
MJD:3964 20.00
JUN 13 2005 1cc & 6 wirts
to Shff
William A. Shaw
Prothonotary/Clerk of Courts **6K**

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.

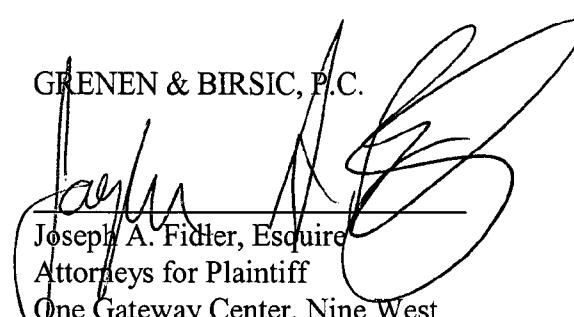
PRAECIPE FOR WRIT OF POSSESSION

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.

GRENEN & BIRSIĆ, 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 | GRENEN | 100973 | 10.00 |
| SHERIFF HAWKINS | GRENEN | 100973 | 24.53 |

Sworn to Before me This

So Answers,

____ Day of _____ 2005


Chester A. Hawkins
Sheriff

FILED

JUN 17 2005 (6)
1:40 p.m. 6K

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)

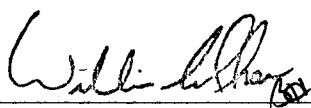
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

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. 2007
at 2:30 a.m./p.m.
Chester A. Klinger by Mandy Hamm
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
William A. Shaw, Prothonotary

Received writ this 13 day of
June A.D. 2005
at 2:30 a.m./p.m.
Chester A. Hawley, Marlyn Hamm
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)

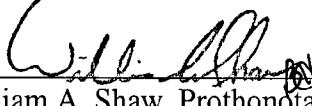
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

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, Sheriff
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. 6:00 p.m.
Chet A. Shonkley, Sheriff
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)

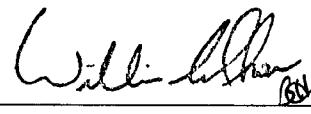
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

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 12:30 a.m./p.m.
Chesler A. Kueker by Marly Harry
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,

vs.

RAYMOND T. SHONCE, JR. AND
DEAN KLINGER,

ISSUE NUMBER:

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

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

FILED NO. cc
MAY 18 2005 JUN 28 2005 Cest. of Disc.
to Atty
William A. Shaw
Prothonotary/Clerk of Court
copy to CIA
(6)

D. L. -

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,

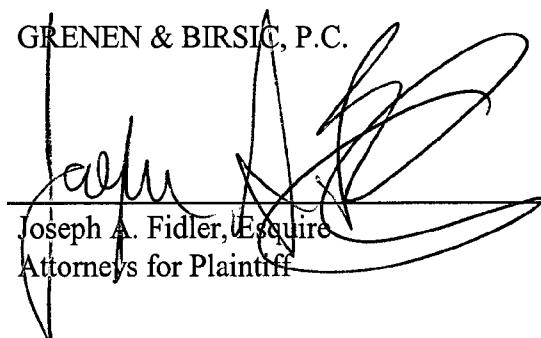
Defendants.

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.

GRENEN & BIRSIĆ, 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

 COPY

**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.

William A. Shaw, Prothonotary