

National City Bank vs James R. Solada et al  
2005-1155-CD

05-1155-CD  
National City Bank of PA vs James R.

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

NATIONAL CITY BANK OF  
PENNSYLVANIA

Plaintiff

vs.

JAMES R. SOLADA and  
RUTH I. SOLADA and  
OCCUPANT

Civil Action No. 05-1155-CD

COMPLAINT IN EJECTMENT

Defendants

FILED ON BEHALF OF  
Plaintiff  
COUNSEL OF RECORD OF  
THIS PARTY:

LORI A. GIBSON, ESQ.  
PA I.D. #68013  
HEIDI A. KORDISH, ESQ.  
PA I.D. #90512

Bernstein Law Firm, P.C.  
Firm #718  
Suite 2200 Gulf Tower  
Pittsburgh, PA 15219  
412-456-8100

**BERNSTEIN FILE NO. F0010810**  
DIRECT DIAL: (412) 456-8138

FILED Aug 8 2005  
10:33 AM  
AUG 08 2005  
3CC Staff

William A. Shaw  
Prothonotary/Clerk of Courts

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

NATIONAL CITY BANK OF  
PENNSYLVANIA  
Plaintiff

vs.

Civil Action No.

JAMES R. SOLADA and  
RUTH I. SOLADA and  
OCCUPANT  
Defendants

**NOTICE AND COMPLAINT IN EJECTMENT**

**NOTICE TO DEFEND**

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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.

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LAWYER REFERRAL SERVICE  
Allegheny County Bar Association  
920 City County Building  
Pittsburgh, PA 15219  
Telephone: 412-261-5555

## **COMPLAINT IN EJECTMENT**

1. Plaintiff is a corporation with offices located at 3232 Newmark Drive, Miamisburg, OH 45342.
2. Defendants are adult individuals residing at RD1 Box 56 Penfield, CLEARFIELD County, Pennsylvania 15849.
3. Plaintiff avers that it is the lawful owner of the property more specifically described as follows by virtue of a Sheriff Sale conducted by the Clearfield County Sheriff on April 1, 2005 Civil Action No.01-1908-CD:

ALL that certain piece or parcel of land, situate, lying and being in Huston Township, Clearfield County, Pennsylvania, bounded and described as follows to wit:

BEING a piece or parcel of land, situate, in the Village of Winterburn, Huston Township, Clearfield County, Pennsylvania, and having a frontage of 120 feet more or less and a depth of 250 feet more or less and having lots No. 21 and 22 in the Craig and Blanchard Addition to the Village of Winterburn and having erected thereon a frame dwelling.

BEING shown on Clearfield County Assessment Map as Item GO3-000-27 and assessed as house and garage, and .500 acres.

BEING the same premises which was granted and conveyed from Arlene Bucksbee now by marriage Arlene DeHaas and Joseph DeHaas, her husband, to James R Solada and Ruth I Solada husband and wife by deed dated and recorded August 8, 1990 in the Clearfield County Recorder's Office in DBV 1357 page 121.

4. Plaintiff avers that the Defendants have unlawfully remained on said property without right or authority.

5. Plaintiff avers that the Defendants have no rights which are superior to those of the Plaintiff.
6. Plaintiff has the right to immediate possession of the aforementioned lot or piece of ground together with the buildings and improvements thereon.

WHEREFORE, Plaintiff demands Judgment in Ejectment against Defendants, jointly and severally, for possession of the premises at RD 1 Box 56 Penfield, Pennsylvania 15849.

BERNSTEIN LAW FIRM, P.C.

BY:   
Attorney for Plaintiff(s)  
Suite 2200 Gulf Tower  
Pittsburgh, PA 15219  
**BERNSTEIN FILE NO. F0010810**  
(412) 456-8111

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities, that he\she is the Banking Officer for the Plaintiff herein, that he\she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint in ~~Mortgagex~~ <sup>Ejectment</sup> ~~Foreclosure~~ are true and correct to the best of his\her knowledge, information and belief.

Teresa A. Clopp  
TERESA S. CLOPP  
AUTHORIZED SIGNER

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

Plaintiff(s) No. 05-1155-CD

vs.

PRAECIPE TO SETTLE,  
DISCONTINUE AND END

JAMES R. SOLADA and  
RUTH I. SOLADA and  
OCCUPANT

Defendant(s) FILED ON BEHALF OF  
Plaintiff(s)

COUNSEL OF RECORD OF  
THIS PARTY:

LORI A. GIBSON, ESQUIRE  
PA ID#68013  
HEIDI A. KORDISH, ESQUIRE  
PA ID#90512

Bernstein Law Firm, P.C.  
Firm #718  
Suite 2200 Gulf Tower  
Pittsburgh, PA 15219  
412-456-8100

**BERNSTEIN FILE NO. F0010810**

**NOTICE**

**THIS IS AN ATTEMPT BY A DEBT COLLECTOR TO COLLECT A DEBT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

68  
**FILED** No CC  
M 19 3205 2 Cert. of Disc.  
SEP 12 2005 to Atty  
William A. Shaw Copy to CIA  
Prothonotary/Clerk of Courts

 COPY

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

**CIVIL DIVISION**

**National City Bank of Pennsylvania**

**Vs.**

**No. 2005-01155-CD**

**James R. Solada**

**Ruth I. Solada**

**Occupant**

**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 September 12, 2005, marked:

Settled, Discontinued and Ended

Record costs in the sum of \$85.00 have been paid in full by Lori A. Gibson, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 12th day of September A.D. 2005.

---

William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100722  
NO: 05-1155-CD  
SERVICE # 1 OF 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: NATIONAL CITY BANK OF PENNSYLVANIA

vs.

DEFENDANT: JAMES R. SOLADA and RUTH I. SOLADA and OCCUPANT

**SHERIFF RETURN**

---

NOW, AT SERVED THE WITHIN COMPLAINT IN EJECTMENT ON JAMES R. SOLADA DEFENDANT AT RD#1 BOX 56, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO , A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: /

FILED  
OCT 21 2005

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100722  
NO: 05-1155-CD  
SERVICE # 2 OF 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: NATIONAL CITY BANK OF PENNSYLVANIA

vs.

DEFENDANT: JAMES R. SOLADA and RUTH I. SOLADA and OCCUPANT

**SHERIFF RETURN**

---

NOW, August 17, 2005 AT 3:00 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON RUTH I. SOLADA DEFENDANT AT LOT 83 HEMLOCK DRIVE, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RUTH SOLADA, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100722  
NO: 05-1155-CD  
SERVICE # 3 OF 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: NATIONAL CITY BANK OF PENNSYLVANIA

vs.

DEFENDANT: JAMES R. SOLADA and RUTH I. SOLADA and OCCUPANT

**SHERIFF RETURN**

---

NOW, AT SERVED THE WITHIN COMPLAINT IN EJECTMENT ON OCCUPANT (SOLADA PROPERTY) DEFENDANT AT RD#1 BOX 56, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO , A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100722  
NO: 05-1155-CD  
SERVICES 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: NATIONAL CITY BANK OF PENNSYLVANIA

VS.

DEFENDANT: JAMES R. SOLADA and RUTH I. SOLADA and OCCUPANT

**SHERIFF RETURN**

---

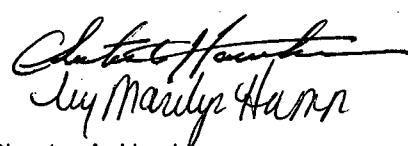
**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	BERNSTEIN	97724	30.00
SHERIFF HAWKINS	BERNSTEIN	97724	40.96

Sworn to Before Me This

So Answers,

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



Chester A. Hawkins  
Sheriff

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

NATIONAL CITY BANK OF  
PENNSYLVANIA

Plaintiff

vs.

JAMES R. SOLADA and  
RUTH I. SOLADA and  
OCCUPANT

Defendants

05-1155 CD  
Civil Action No.

COMPLAINT IN EJECTMENT

FILED ON BEHALF OF  
Plaintiff  
COUNSEL OF RECORD OF  
THIS PARTY:

LORI A. GIBSON, ESQ.  
PA I.D. #68013  
HEIDI A. KORDISH, ESQ.  
PA I.D. #90512

Bernstein Law Firm, P.C.  
Firm #718  
Suite 2200 Gulf Tower  
Pittsburgh, PA 15219  
412-456-8100

**BERNSTEIN FILE NO. F0010810**  
DIRECT DIAL: (412) 456-8138

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

AUG 08 2005

Attest.

*William B. Hause*  
Prothonotary/  
Clerk of Courts

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

NATIONAL CITY BANK OF  
PENNSYLVANIA

Plaintiff

vs.

Civil Action No.

JAMES R. SOLADA and  
RUTH I. SOLADA and

OCCUPANT

Defendants

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## **COMPLAINT IN EJECTMENT**

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2. Defendants are adult individuals residing at RD1 Box 56 Penfield, CLEARFIELD County, Pennsylvania 15849.

3. Plaintiff avers that it is the lawful owner of the property more specifically described as follows by virtue of a Sheriff Sale conducted by the Clearfield County Sheriff on April 1, 2005 Civil Action No.01-1908-CD:

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4. Plaintiff avers that the Defendants have unlawfully remained on said property without right or authority.

5. Plaintiff avers that the Defendants have no rights which are superior to those of the Plaintiff.
6. Plaintiff has the right to immediate possession of the aforementioned lot or piece of ground together with the buildings and improvements thereon.

WHEREFORE, Plaintiff demands Judgment in Ejectment against Defendants, jointly and severally, for possession of the premises at RD 1 Box 56 Penfield, Pennsylvania 15849.

BERNSTEIN LAW FIRM, P.C.

BY:   
Attorney for Plaintiff(s)  
Suite 2200 Gulf Tower  
Pittsburgh, PA 15219  
**BERNSTEIN FILE NO. F0010810**  
(412) 456-8111

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~~Foreclosure~~ are true and correct to the best of his\her knowledge, information and belief.

Teresa S. Clopp  
TERESA S. CLOPP  
AUTHORIZED SIGNER

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CIVIL DIVISION

NATIONAL CITY BANK OF  
PENNSYLVANIA

Plaintiff

vs.

Civil Action No. 05-1155-CJ

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RUTH I. SOLADA and  
OCCUPANT

COMPLAINT IN EJECTMENT

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COUNSEL OF RECORD OF  
THIS PARTY:

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Attest.

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Civil Action No.

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BERNSTEIN LAW FIRM, P.C.

BY:   
Attorney for Plaintiff(s)  
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~~Foreclosure~~ <sup>Ejectment</sup> are true and correct to the best of his\her knowledge, information and belief.

Teresa S. Clopp  
TERESA S. CLOPP  
AUTHORIZED SIGNER