



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

NATIONAL CITY BANK OF  
PENNSYLVANIA,

Plaintiff

vs.

JOHN TARTAL, JR. AND  
REBECCA RUTH TARTAL AND  
OCCUPANTS

Defendants

Civil Action No. *05-1818-CD*

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. F0040761**  
DIRECT DIAL: (412) 456-8138

**FILED** *Any pd.*  
*m/10:00 AM 85.00*  
**NOV 21 2005** *3 cc shff*  
*W*  
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.

JOHN TARTAL, JR. AND  
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OCCUPANTS  
Defendants

NOTICE AND COMPLAINT IN EJECTMENT

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served upon you, 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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 BAR ASSOCIATION  
PO BOX 186  
HARRISBURG, PA 17108

## **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 203 N Fourth Street, Dubois, CLEARFIELD County, Pennsylvania 15801.

3. Plaintiff avers that it is the lawful owner of the property by virtue of a Sheriff Sale conducted by Clearfield Sheriff Office on October 7, 2005 at Civil Action No. 03-1675-CD more specifically described below as:

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

On the North by Lot No. 10, on the East by North Fourth Street, on the South by South Park Place, on the West by a 16 foot alley. Being 104 feet wide on North Fourth Street and said Alley, and 142 feet along Lot No. 10 and South Park Place, Known as Lots No. 11 and 12 in the J.E. Dubois Plan of Lots.

BEING the same premises which Donald H. Flowers and Susan P. Flowers by their deed dated November 7, 1994 and recorded November 17, 1994 in the Office of the Clearfield County Recorder of Deeds, in Deed Book Volume 1644, page 271, granted and conveyed unto John Tartal Jr. and Rebecca Ruth Tartal.

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 203 N Fourth Street, Dubois, Pennsylvania 15801.

BERNSTEIN LAW FIRM, P.C.

BY: 

Attorney for Plaintiff(s)

Suite 2200 Gulf Tower

Pittsburgh, PA 15219

**BERNSTEIN FILE NO. F0040761**

(412) 456-8111

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

Service # 1 of 3 Services

Sheriff Docket # **101026**

NATIONAL CITY BANK OF PENNSYLVANIA

Case # 05-1818-CD

vs.

JOHN TARTAL JR. and REBECCA RUTH TARTAL and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW December 21, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOHN TARTAL JR., DEFENDANT. 203 N. FOURTH ST., DUBOIS, PA. "EMPTY".

SERVED BY: /

**FILED**  
012:49:01  
DEC 21 2005

William A. Shaw  
Prothonotary/Clerk of Courts

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

Service # 2 of 3 Services

Sheriff Docket # **101026**

NATIONAL CITY BANK OF PENNSYLVANIA

Case # 05-1818-CD

vs.

JOHN TARTAL JR. and REBECCA RUTH TARTAL and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW December 21, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO REBECCA RUTH TARTAL, DEFENDANT. 203 N. FOURTH ST., DUBOIS, PA. "EMPTY".

SERVED BY: /

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

Service # 3 of 3 Services

Sheriff Docket # **101026**

NATIONAL CITY BANK OF PENNSYLVANIA

Case # 05-1818-CD

vs.

JOHN TARTAL JR. and REBECCA RUTH TARTAL and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW December 21, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO OCCUPANTS (TARTAL PROPERTY), DEFENDANT. 203 N. FOURTH ST., DUBOIS, PA ."EMPTY".

SERVED BY: /



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101026  
NO: 05-1818-CD  
SERVICES 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: NATIONAL CITY BANK OF PENNSYLVANIA

vs.

DEFENDANT: JOHN TARTAL JR. and REBECCA RUTH TARTAL and OCCUPANTS

SHERIFF RETURN

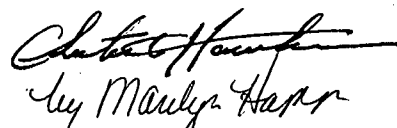
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	BERNSTEIN	99060	30.00
SHERIFF HAWKINS	BERNSTEIN	99060	42.43

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff

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CIVIL DIVISION

NATIONAL CITY BANK OF  
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OCCUPANTS

Defendants

Civil Action No. 05-181-8-CD

COMPLAINT IN EJECTMENT

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

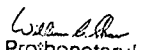
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**BERNSTEIN FILE NO. F0040761**  
DIRECT DIAL: (412) 456-8138

I hereby certify this to be a true  
and attested copy of the original  
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NOV 21 2005

Attest.

  
Prothonotary/  
Clerk of Courts

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*William L. Brown*  
Prothonotary/  
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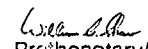
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