

06-1525-CD
Brian R. Grubbs vs Louis Erickson et al

Brian Grubbs vs Louis Erickson et al
2006-1525-CD

William A. Shaw
Prothonotary/Clerk of Courts

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

| | | |
|-------------------------------|---|--------------------|
| BRIAN R. GRUBBS, | : | |
| Plaintiff | : | No.: 2006- -CD |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| LOUIS ERICKSON a/k/a LARS | : | |
| ERICKSON a/k/a LARS ERICKSON | : | |
| FLODIN and CHRISTINA ERICKSON | : | |
| a/k/a CHRISTINA ERICKSON | : | |
| FLODIN, his wife; MARTHA | : | |
| CHRISTINA ERICKSON FLODIN; | : | |
| STEVE HOVAN a/k/a STEVE HOBAN | : | |
| a/k/a STEVE HOVANEK and ANNA | : | |
| HOVAN a/k/a ANNA HOBAN a/k/a | : | |
| ANNA HOVANEK, his wife; | : | |
| and their heirs, executors, | : | |
| administrators, successors, | : | |
| trustees, and assigns, known | : | |
| or unknown, and any other | : | |
| person who may claim title or | : | |
| an interest in the property | : | |
| subject to this action, | : | |
| Defendants | : | |

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may

be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the 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.

David Meholick
Court Administrator's Office
Clearfield County Court House
Clearfield, PA 16830
(814) 765-2641

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

| | | |
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| BRIAN R. GRUBBS, | : | |
| Plaintiff | : | No.: 2006- |
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| vs. | : | QUIET TITLE ACTION |
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| LOUIS ERICKSON a/k/a LARS | : | |
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| FLODIN, his wife; MARTHA | : | |
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| STEVE HOVAN a/k/a STEVE HOBAN | : | |
| a/k/a STEVE HOVANEK and ANNA | : | |
| HOVAN a/k/a ANNA HOBAN a/k/a | : | |
| ANNA HOVANEK, his wife; | : | |
| and their heirs, executors, | : | |
| administrators, successors, | : | |
| trustees, and assigns, known | : | |
| or unknown, and any other | : | |
| person who may claim title or | : | |
| an interest in the property | : | |
| subject to this action, | : | |
| Defendants | : | |

COMPLAINT

AND NOW comes, Brian R. Grubbs, by and through his attorney, Girard Kasubick, Esq., and files the following Complaint:

1. The Plaintiff is Brian R. Grubbs, who resides at 327 B Kenmore Drive, Hampton, VA 23661.
2. The Defendants are Louis Erickson a/k/a Lars Erickson a/k/a Lars Erickson Flodin and Christina Erickson a/k/a Christina Erickson Flodin; Martha

Christina Erickson Flodin; and Steve Hovan a/k/a Steve Hovan a/k/a Steve Hovanec and Anna Hovan a/k/a Anna Hoban a/k/a Anna Hovanec, his wife, and their heirs, executors, administrators, successors, trustees, and assigns, known or unknown, and any other person who may claim title under them, and who are deceased or their whereabouts are unknown.

3. The real property involved in and subject of this action is the real property or parcel of land situated in Morris Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of a sixteen foot alley; thence along said alley South eighty-nine degrees East one hundred and two and five tenths (102.5) feet to post; thence by said alley and lands of Alex Larson, North three degrees and thirty minutes West one hundred and eighty-six feet (186) to post; thence by another alley South eighty-five degrees and thirty minutes West eighty-seven and six tenths (87.6) feet to post; thence by lands of August Bloomquest (now Hovan) South thirty minutes East one hundred and eighty-five and eight tenths (185.8) feet to post and point of beginning. CONTAINING four hundred and five one thousands of one acre.

The above property is a part of Clearfield County Tax Map No. 124-R09-543-13. The above property hereinafter referred to as "Premises".

4. The deeds and method by which Brian R. Grubbs obtained title to the real property described in Paragraph 3 above of this Complaint is as follows:

a). The Premises was conveyed to Brian R. Grubbs by deed from Patti L. Grubbs dated October 2, 2000

and recorded in Clearfield County Instrument No. 200016288. The Premises is the Third Thereof tract described in said deed and the description is a part of Tax Map No. 124-R09-543-13. This deed conveyed all interests of Patti L. Grubbs.

b). The Premises was conveyed to Brian R. Grubbs and Patti L. Grubbs, his wife, by deed from Patricia A. Hovan, Administrator of the Estate of George Hovan a/k/a George Chovenac a/k/a George Chovenec a/k/a George Hovanec and Patricia Hovan, single, dated June 29, 1984 and recorded in Clearfield County Deed Book 956, Page 213. The Premises is the Third Thereof in this deed.

c). George Hovan a/k/a George Chovenac a/k/a George Chovanec a/k/a George Hovanec died November 26, 1983. His Estate is in Clearfield County Estate File No. 83-423 and it shows that he owned a house and lot in Morris Township which is averred to be Tax Map No. 124-R09-543-13 of which the Premises herein is a part. Letters of Administration in this Estate were granted to Patricia E. Hovan, the sole heir of the Estate, who was the daughter of George Hovan.

d). The Premises subject of this action was devised to George Hovan in the Estate of Anna Hovan, who died June 10, 1968 as shown in Clearfield County Estate

File No. 27554. The Will of Anna Hovan in Will Book 13, Page 542 leaves all her estate to her son, George Hovan. This Will would devise all Anna Hovan's interest in real property and it is averred that she owned Tax map No. 124-R09-542-13 of which the Premises subject of this action is a part.

e). The Premises subject of this action was conveyed to Anna Hoban a/k/a Ann Hovan by deed from Robert Flegal and Mary Flegal, his wife, dated November 23, 1943 and recorded on July 3, 1984 in Clearfield County Deeds and Records Book 956, Page 210. It is averred that Anna Hovan and Anna Hoban were the same person. This deed contains no metes and bounds description but describes the real property as a H & L conveyed to Robert Flegal by Clearfield County Commissioners on August 26, 1943. The deed into Robert Flegal was acknowledged on August 26, 1943.

f). The Premises subject of this action was conveyed to Robert Flegal by deed from the Clearfield County Commissioners in the name of George and Anna Hovan dated August 23, 1943 and acknowledged August 26, 1943 and recorded on July 3, 1984 in Clearfield County Deeds and Records Book 956, Page 208. This deed contains no metes and bounds description, but described the property as a H

& L sold at April 28, 1943 Tax Sale as property assessed to George and Anna Hovan.

g). The Premise subject of this action was conveyed to Clearfield County Commissioners by deed from the Treasurer of Clearfield County in the name of George and Anna Hovan dated July 8, 1940 and acknowledged July 8, 1940 and recorded on July 3, 1984 in Clearfield County Deeds and Records Book 956, Page 205. This deed contains no metes and bounds description but described the property as a H & L sold at January 25, 1940 Treasurers Sale as property assessed to George and Anna Hovan.

h). In Clearfield County Lands Sold to County Book 8, Page 168 it shows that the house and lot in Morris Township assessed in the name of George and Anna Hovan was sold to the County on January 25, 1940 for unpaid taxes. The remarks in said book state that the property was sold at Commissioner's Tax Sale on April 28, 1943 to Robert Flegal.

i). The Premises subject of this action was conveyed to Mrs. Anna Hovan and George Hovan by deed from the Clearfield County Commissioners in the name of Lars Erickson dated December 30, 1936 and acknowledged March 23, 1937 and recorded July 3, 1984 in Clearfield County Deeds and Records Book 956, Page 203. This deed contains

no metes and bounds description but described the property as a H & L sold at November 19, 1936 Treasurers Sale as property assessed to Lars Erickson.

j). The Premises subject of this action was conveyed to the Clearfield County Commissioners by deed from the Treasurer of Clearfield County in the name of Lars Erickson dated February 9, 1932 and acknowledged May 23, 1932 and recorded July 3, 1984 in Clearfield County Deeds and Records Book 956, Page 200. This deed contains no metes and bounds description but described the property as a H & L sold at August 10, 1931 Treasurers Sale as property assessed to Lars Erickson.

k). In Clearfield County Lands Sold to County Book 4, Page 78 it shows that the house and lot in Morris Township assessed in the name of Lars Erickson was sold to the County on August 10, 1931 for unpaid taxes. The remarks in said book state that the property was sold at Commissioner's Tax Sale on November 19, 1936 to George and Anna Hovan.

l). The assessment records of Morris Township, Clearfield County, Pennsylvania shows that George and Anna Hovan are assessed with a house and lot from 1937 to 1940 when sold to the County and that Lars Erickson was assessed with the house and lot from the early 1900's

until 1932 when sold to the County. The assessment to George and Anna Hovan indicates the property is from William Eisenhauer and C. E. Chase but this appears to be in error and is the property of Lars Erickson.

m). The records of Clearfield County show that Anna Hovan a/k/a Anna Hovanec was married to Steve Hovan a/k/a Steve Hovanec and George Hovan was the son of Anna Hovan and Steve Hovan. In Deed Book 956, Page 213 above it indicates that Steve Hovan died on September 18, 1935 but after diligent search of the records in the Clearfield County Register of Wills Office no estate was found on Steve Hovan a/k/a Steve Hovanec.

n). The Premises subject of this action was conveyed to Louis Erickson by deed from O. L. Schoonover dated May 23, 1900 and recorded July 3, 1900 in Clearfield County Deed Book 112, Page 16. This deed contains the same metes and bounds description as the Third Thereof in Deed recorded in Instrument No. 200016288 in subparagraph a). above and is described in paragraph 3. of this Complaint.

o). It is averred that Lars Erickson and Louis Erickson are the same person. After diligent search of the records of the Register of Wills Office of Clearfield County, there is an Estate for Lars Erickson in Clearfield

County Estate File No. 9814 who died June 9, 1924 and he made a joint will with his wife, Christina Erickson, which is filed in Clearfield County Will Book M, Page 479.

p). The joint will of Lars Erickson and Christina Erickson in Will Book M, Page 479 indicates that he was also known as Lars Erickson Flodin and his wife as Christina Erickson Flodin and that they had a daughter, Martha Christina Erickson Flodin. The will leaves the Estate of Lars Erickson a/k/a Lars Erickson Flodin and Christina Erickson Flodin to their daughter, Martha Christina Erickson Flodin.

q). After diligent search of the records of the Register of Wills Office of Clearfield County, no estates were found on Christina Erickson a/k/a Christina Erickson Flodin or Martha Christina Erickson Flodin.

5. The Plaintiff and his predecessors in title to Tax Map No. 124-R09-543-13 have been in open, continuous, notorious, actual, exclusive, visible, distinct and hostile possession of the premises described in Paragraph 3 of this Complaint in excess of twenty-one (21) years immediately preceding the filing of this Action, and thereby claim title by adverse possession.

6. This Quiet Title Action is also necessary to establish a proper chain of title out of which the

Premises subject of this action comes, because of irregularities in the chain of title, including possible unrecorded deeds, variances in the descriptions, tax sale deeds, no tax assessment or unknown tax assessment of the Premises at times, no proof of deaths or estates proving heirs, all of which raise a question as to the chain of title to the property and create a cloud on title.

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

8. The Defendants to this Action namely; Louis Erickson a/k/a Lars Erickson a/k/a Lars Erickson Flodin and Christina Erickson a/k/a Christina Erickson Flodin, his wife, Martha Christina Erickson Flodin, Steve Hovan a/k/a Steve Hoban a/k/a Steve Hovanec and Anna Hovan a/k/a Anna Hoban a/k/a Anna Hovanec, his wife, are deceased or their whereabouts are unknown and Plaintiff has made a diligent and reasonable search to locate the whereabouts of the Defendants, but they are deceased or their whereabouts are unknown.

WHEREFORE, Plaintiff brings this action and respectfully requests the Court to decree as follows:

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

b). That such other relief be granted as may be necessary in establishing Plaintiff's title, including determinations on the validity or discharge of any documents, obligations or deeds affecting right, title and interest in the property described herein.

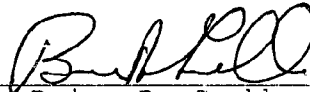
c). Such other and further relief as the Court deems proper.

A handwritten signature in cursive script, reading "Girard Kasubick", written over a horizontal line.

Girard Kasubick, Esq.
Attorney for Plaintiff

VERIFICATION

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

A handwritten signature in dark ink, appearing to read 'Brian R. Grubbs', is written over a horizontal line.

Brian R. Grubbs

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

BRIAN R. GRUBBS, :
Plaintiff : No.: 2006-
vs. : QUIET TITLE ACTION
LOUIS ERICKSON a/k/a LARS :
ERICKSON a/k/a LARS ERICKSON :
FLODIN and CHRISTINA ERICKSON :
a/k/a CHRISTINA ERICKSON :
FLODIN, his wife; MARTHA :
CHRISTINA ERICKSON FLODIN; :
STEVE HOVAN a/k/a STEVE HOBAN :
a/k/a STEVE HOVANEC and ANNA :
HOVAN a/k/a ANNA HOBAN a/k/a :
ANNA HOVANEC, his wife; :
and their heirs, executors, :
administrators, successors, :
trustees, and assigns, known :
or unknown, and any other :
person who may claim title or :
an interest in the property :
subject to this action, :
Defendants :

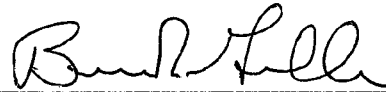
AFFIDAVIT

COMMONWEALTH OF VIRGINIA :
~~CITY~~ : \$:
~~COUNTY~~ OF Newport News :

Before me, the undersigned officer, personally appeared BRIAN R. GRUBBS, who being duly sworn according to law, deposes and says that the names of the Defendants, Louis Erickson a/k/a Lars Erickson, a/k/a Lars Erickson Flodin and Christina Erickson a/k/a Christina Erickson Flodin, his wife; Martha Christina Erickson Flodin; Steve Hovan a/k/a Steve Hoban a/k/a Steve Hovanec and Anna Hovan a/k/a Anna Hoban a/k/a Anna Hovanec, his wife; and their

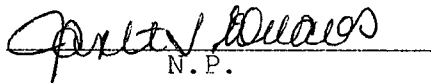
heirs, executors, administrators, successors, trustees, and assigns, known or unknown, and any other person who may claim title under them, and who are deceased or their whereabouts are unknown to the Plaintiff

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



Brian R. Grubbs

Sworn to and subscribed
before me this 18th
day of September, 2006.


N.P.

BRIAN R. GRUBBS,
Plaintiff

VS.

LOUIS ERICKSON a/k/a LARS
ERICKSON a/k/a LARS ERICKSON
FLODIN and CHRISTINA ERICKSON
a/k/a CHRISTINA ERICKSON
FLODIN, his wife; MARTHA
CHRISTINA ERICKSON FLODIN;
STEVE HOVAN a/k/a STEVE HOBAN
a/k/a STEVE HOVANEC and ANNA
HOVAN a/k/a ANNA HOBAN a/k/a
ANNA HOVANEC, his wife;
and their heirs, executors,
administrators, successors,
trustees, and assigns, known
or unknown, and any other
person who may claim title
or an interest in the
property subject to this
action,

Defendants

: No.: 2006- 1525-CD
:
: Type of Case:
: Quiet Title Action
: Type of Pleading:
: Motion For Service
: By Publication
: Filed on behalf of:
: Plaintiff
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: 611 Brisbin Street
: Houtzdale, PA 16651
:
:
:
:
:
:
:
:
:
:

FILED

1:20 p.m. 6K

SEP 20 2006

No CC

William A. Shaw
Prothonotary/Clerk of Courts

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

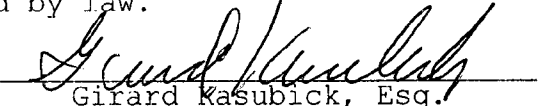
| | | |
|-------------------------------|---|--------------------|
| BRIAN R. GRUBBS, | : | |
| Plaintiff | : | No.: 2006- |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| LOUIS ERICKSON a/k/a LARS | : | |
| ERICKSON a/k/a LARS ERICKSON | : | |
| FLODIN and CHRISTINA ERICKSON | : | |
| a/k/a CHRISTINA ERICKSON | : | |
| FLODIN, his wife; MARTHA | : | |
| CHRISTINA ERICKSON FLODIN; | : | |
| STEVE HOVAN a/k/a STEVE HOBAN | : | |
| a/k/a STEVE HOVANEK and ANNA | : | |
| HOVAN a/k/a ANNA HOBAN a/k/a | : | |
| ANNA HOVANEK, his wife; | : | |
| and their heirs, executors, | : | |
| administrators, successors, | : | |
| trustees, and assigns, known | : | |
| or unknown, and any other | : | |
| person who may claim title or | : | |
| an interest in the property | : | |
| subject to this action, | : | |
| Defendants | : | |

MOTION FOR SERVICE BY PUBLICATION

1. Your Petitioner is Brian R. Grubbs, Plaintiff, in the above captioned matter.

2. Petitioner, by attached affidavit incorporated herein by reference thereto, believes that all the named Defendants are deceased or their whereabouts are unknown.

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


Girard Kasubick, Esq.
Attorney for Plaintiff

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

BRIAN R. GRUBBS,
Plaintiff

:
: No.: 2006-1525-CD

vs.

: QUIET TITLE ACTION

:
: LOUIS ERICKSON a/k/a LARS
: ERICKSON a/k/a LARS ERICKSON
: FLODIN and CHRISTINA ERICKSON
: a/k/a CHRISTINA ERICKSON
: FLODIN, his wife; MARTHA
: CHRISTINA ERICKSON FLODIN;
: STEVE HOVAN a/k/a STEVE HOBAN
: a/k/a STEVE HOVANEK and ANNA
: HOVAN a/k/a ANNA HOBAN a/k/a
: ANNA HOVANEK, his wife;
: and their heirs, executors,
: administrators, successors,
: trustees, and assigns, known
: or unknown, and any other
: person who may claim title or
: an interest in the property
: subject to this action,
: Defendants

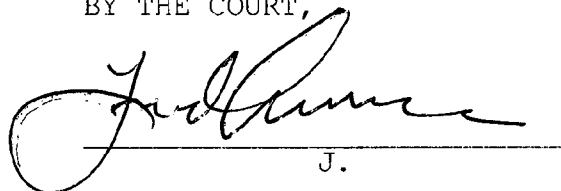
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SEP 21 2006 Kasubick
William A. Shaw
Prothonotary/Clerk of Courts

ORDER DIRECTING COMPLAINT TO BE SERVED
BY ADVERTISEMENT ON DEFENDANTS

NOW, this 21ST day of September, 2006, the
within Action being an Action to Quiet Title and the
Plaintiff having made Affidavit that the addresses of all
Defendants are unknown and cannot be ascertained, and
therefore upon Motion of Girard Kasubick, Esq., Attorney
for Plaintiff, it is Ordered and Decreed that substitute
service by publication be made upon all the Defendants

whose addresses are unknown, or may be deceased, by giving notice in the Progress, a newspaper of general circulation published in the Clearfield County area and in the Clearfield County Legal Journal, to the above named Defendants whose addresses are unknown, or may be deceased; such publication to be one (1) time only stating that this action has been filed, and that this Complaint must be pleaded to within twenty (20) days after publication of notice; otherwise judgment will be taken against all of the Defendants by default.

BY THE COURT,


J.

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

BRIAN R. GRUBBS,
Plaintiff

vs.

LOUIS ERICKSON, ET AL.,
Defendants

:
: No.: 2006-1525-CD
: Type of Case: Quiet
: Title Action
: Type of Pleading:
: Affidavit of Service
: Filed on behalf of:
: Plaintiff
: Counsel of Record for
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED NO CC
OCT 30 2006

William A. Shaw
Prothonotary/Clerk of Courts

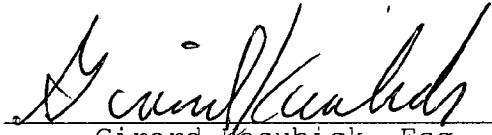
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA
CIVIL DIVISION

| | | |
|-------------------------|---|--------------------|
| BRIAN R. GRUBBS, | : | |
| Plaintiff | : | No.: 2006-1525-CD |
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| vs. | : | QUIET TITLE ACTION |
| | : | |
| LOUIS ERICKSON, ET AL., | : | |
| Defendants | : | |

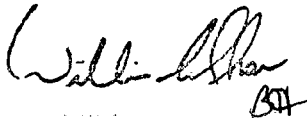
AFFIDAVIT OF SERVICE

Before me, William A. Shaw, Prothonotary, personally appeared Girard Kasubick, Esq., who being duly sworn according to law, deposes and says that service was made in this case by publication in the Clearfield Progress one time only on September 28, 2006 and in the Clearfield County Legal Journal one time only for the week of October 6, 2006, as appears by sworn proofs hereto attached, and that all the named Defendants who are deceased or their whereabouts are unknown were served by publication and not by any other manner. No appearance having been entered on behalf of any of the Defendants served by publication, nor any answer filed by any of them after service of a Complaint containing a notice to defend. Plaintiff has caused this Affidavit to be made for the purpose of obtaining a decree or Order of Court under Pa. R.C.P. 1066.

WHEREFORE, this Affidavit of Service made by the manner aforesaid is made for the purpose of obtaining a Decree of Court.


Girard Kasubick, Esq.,
Attorney for Plaintiff

Sworn to and subscribed
before me this 30th
day of October, 2006.


BT

N. P.

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

NOTICE
IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY, PA
CIVIL DIVISION
No.: 2006-1525-CD
QUIET TITLE ACTION

BRIAN, R. GRUBBS,
Plaintiff

vs.

LOUIS ERICKSON,
a/k/a LARS ERICKSON,
a/k/a LARS ERICKSON FLODIN
and CHRISTINA ERICKSON,
a/k/a CHRISTINA
ERICKSON FLODIN

his wife;

MARTHA CHRISTINA
ERICKSON FLODIN;

STEVE HOVAN,

a/k/a STEVE HOBAN,
a/k/a STEVE HOVANEK

and ANNA HOVAN,

a/k/a ANNA HOBAN,

a/k/a ANNA HOVANEK,

his wife;

and their heirs, executors,
administrators, successors,

trustees, and assigns,

known or unknown,

and any other person

who may claim title

or an interest in

the property

subject to

this action,

Defendants

ACTION TO
QUIET TITLE
NOTICE

TO: LOUIS ERICKSON, a/k/a
LARS ERICKSON, a/k/a LARS
ERICKSON FLODIN and CHRISTI-
NA ERICKSON, a/k/a CHRISTINA
ERICKSON FLODIN, his wife;
MARTHA CHRISTINA ERICKSON
FLODIN; STEVE HOVAN, a/k/a
STEVE HOBAN, a/k/a STEVE
HOVANEK and ANNA HOVAN,
a/k/a ANNA HOBAN, a/k/a ANNA
HOVANEK, his wife; and their
heirs, executors, administrators,
successors, trustees, and assigns,
known or unknown:

You have been sued in Court. You
are hereby notified that an Action to
Quiet Title to that tract or parcel of
land located in Morris Township,
Clearfield County, Pennsylvania,
has been filed against you. Said
land is bounded and described as
follows:

BEGINNING at a post on line of a
sixteen foot alley; thence along said
alley South eighty-nine degrees
East one hundred and two and five
tenths (102.5) feet to post; thence
by said alley and lands of Alex Lar-
son, North three degrees and thirty
minutes West one hundred and
eighty-six feet (186) to post;
thence by another alley South
eighty-five degrees and thirty min-
utes West eighty-seven and six
tenths (87.6) feet to post; thence
by lands of August Bloomquest
(now Hovan) South thirty minutes
East one hundred and eighty-five
and eight tenths (185.8) feet to
post and point of beginning. CON-
TAINING four hundred and five one
thousands of one acre.

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA

SS:

COUNTY OF CLEARFIELD

On this 29th day of September, A.D. 20 06,
before me, the subscriber, a Notary Public in and for said County and
State, personally appeared Margaret E. Krebs, who being duly sworn
according to law, deposes and says that she is the President of The
Progressive Publishing Company, Inc., and Associate Publisher of The
Progress, a daily newspaper published at Clearfield, in the County of
Clearfield and State of Pennsylvania, and established April 5, 1913, and
that the annexed is a true copy of a notice or advertisement published in
said publication in

the regular issues of September 28, 2006

And that the affiant is not interested in the subject matter of the notice or
advertising, and that all of the allegations of this statement as to the time,
place, and character of publication are true.

Sworn and subscribed to before me the day and year aforesaid.

Cheryl J. Robison
Notary Public
Clearfield, Pa.

My Commission Expires
October 31, 2007

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Cheryl J. Robison, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Oct. 31, 2007

Member, Pennsylvania Association Of Notaries

The above property is a part of
Clearfield County Tax Map No.
124-R09-5431-13.

You are further notified to appear
and answer the Complaint in said
Action within twenty (20) days from
the date of this publication, other-
wise judgment will be entered
against you barring you from all
claims, rights and interest inconsis-
tent with the Plaintiff's claim of title,
as set forth in the Complaint.

NOTICE

TO: LOUIS ERICKSON, a/k/a
LARS ERICKSON, a/k/a LARS
ERICKSON FLODIN and CHRISTI-
NA ERICKSON, a/k/a CHRISTINA
ERICKSON FLODIN, his wife;
MARTHA CHRISTINA ERICKSON
FLODIN; STEVE HOVAN, a/k/a
STEVE HOBAN, a/k/a STEVE
HOVANEK and ANNA HOVAN,
a/k/a ANNA HOBAN, a/k/a ANNA
HOVANEK, his wife; and their
heirs, executors, administrators,
successors, trustees, and assigns,
known or unknown:

If you wish to defend, you must
enter a written appearance person-
ally or by attorney and file your de-
fenses or objections in writing with
the Court. You are warned that if
you fail to do so, the case may pro-
ceed without and a judgment may
be entered against you without fur-
ther notice for the relief requested
by the Plaintiff. You may lose
money or property or other rights
important to you.

YOU SHOULD TAKE THIS PA-
PER 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.

Court Administrator's Office
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

LEHMAN & KASUBICK
611 Brisbin Street
Houtzdale, PA 16651

9:28-1d-b

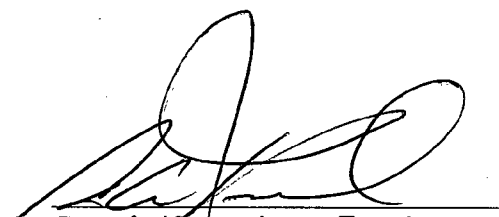
PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

:

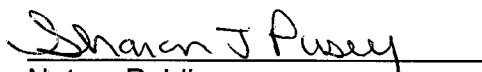
COUNTY OF CLEARFIELD :

On this 6th day of October AD 2006, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of October 6, 2006, ~~October 13, 2006, October 20, 2006~~, Vol. 18 No. 40, ~~41, 42~~. And that all of the allegations of this statement as to the time, place, and character of the publication are true.



Gary A. Knaresboro, Esquire
Editor

Sworn and subscribed to before me the day and year aforesaid.



Notary Public
My Commission Expires

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

Lehman & Kasubick
611 Brisbin Street
Houtzdale PA 16651

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

BRIAN R. GRUBBS, Plaintiff vs. LOUIS ERICKSON a/k/a LARS ERICKSON a/k/a LARS ERICKSON FLODIN and CHRISTINA ERICKSON a/k/a CHRISTINA ERICKSON FLODIN, his wife; MARTHA CHRISTINA ERICKSON FLODIN; STEVE HOVAN a/k/a STEVE HOVANEC and ANNA HOVAN a/k/a ANNA HOVAN a/k/a ANNA HOVANEC, his wife; and their heirs, executors, administrators, successors, trustees, and assigns, known or unknown and any other person who may claim title or an interest in the property subject to this action, Defendants

No. 2006-1525-CE

**ACTION TO QUIET TITLE
NOTICE**

LOUIS ERICKSON a/k/a LARS ERICKSON a/k/a LARS ERICKSON FLODIN and CHRISTINA ERICKSON a/k/a CHRISTINA ERICKSON FLODIN, his wife; MARTHA CHRISTINA ERICKSON FLODIN; STEVE HOVAN a/k/a STEVE HOVANEC and ANNA HOVAN a/k/a ANNA HOVANEC, his wife; and their heirs, executors, administrators, successors, trustees, and assigns, known or unknown:

You have been sued in Court. You are hereby notified that an Action to Quiet Title to that tract or parcel of land located in Morris Township, Clearfield County Pennsylvania, has been filed against you. Said land is bounded and described as follows:

BEGINNING at a post on line of a sixteen foot alley thence along said alley South eighty-nine degrees East one hundred and two and five tenths (102.5) feet to post, thence by said alley and lands of Alex Larson. North three degrees and thirty minutes West one hundred and eighty-six feet (186) to post; thence by another alley South eighty-five degrees and thirty minutes West eighty-seven and six tenths (87.6) feet to post; thence by lands of August Bloomquest (now Hovan) South thirty minutes East one hundred and eighty-five and eight tenths (185.8) feet to post and

point of beginning, CONTAINING four hundred and five one thousands of one acre.

The above property is a part of Clearfield County Tax Map No. 124-R09-543-13

You are further notified to appear and answer the Complaint in said Action within twenty (20) days from the date of this publication, otherwise judgment will be entered against you barring you from all claims, rights and interest inconsistent with the Plaintiff's claim of title as set forth in the Complaint.

NOTICE

LOUIS ERICKSON a/k/a LARS ERICKSON a/k/a LARS ERICKSON FLODIN and CHRISTINA ERICKSON a/k/a CHRISTINA ERICKSON FLODIN, his wife; MARTHA CHRISTINA ERICKSON FLODIN; STEVE HOVAN a/k/a STEVE HOVANEC and ANNA HOVAN a/k/a ANNA HOVANEC, his wife; and their heirs, executors, administrators, successors, trustees, and assigns, known or unknown:

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

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, 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.

Court Administrator's Office, Clearfield County Courthouse, Clearfield, PA 16830. (814) 765-2641.

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

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

BRIAN R. GRUBBS,
Plaintiff

vs.

LOUIS ERICKSON, ET AL.,
Defendants

:
: No.: 2006-1525-CD
: Type of Case: Quiet
: Title Action
: Type of Pleading:
: Motion for Judgment
: Filed on behalf of:
: Plaintiff
: Counsel of Record for
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: LEHMAN & KASUBICK
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED NO
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@

William A. Shaw
Prothonotary/Clerk of Courts

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

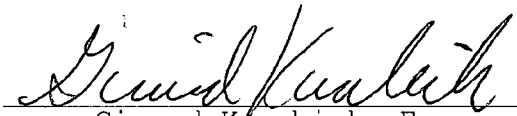
| | | |
|-------------------------|---|--------------------|
| BRIAN R. GRUBBS, | : | |
| Plaintiff | : | No.: 2006-1525-CD |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| LOUIS ERICKSON, ET AL., | : | |
| Defendants | : | |

MOTION FOR JUDGMENT

NOW, this 30th day of October, 2006, an Affidavit having been executed and presented herewith on behalf of the Plaintiff showing that the Complaint was served by publication on all of the Defendants, one time only, to wit: September 28, 2006 in the Clearfield Progress and the week of October 6, 2006 in the Clearfield County Legal Journal, and further that all the named Defendants who are deceased or their whereabouts are unknown were not served in any other manner, and no Defendants served by publication having entered an appearance or filed an Answer or having expressed any purpose of intent to be heard or desire to assert title to said property, and twenty (20) days having elapsed since the last publication, and it appearing that it was impossible to serve any of the Defendants by any other means.

WHEREFORE, Girard Kasubick, Esq., prays Your Honorable Court, as attorney for the Plaintiff, that

judgment be entered in favor of the Plaintiff and against the Defendants, their heirs and assigns, with direction that they file suit in ejectment or otherwise enter proceedings to contest the case within thirty (30) days, or judgment may be entered against them forever barring them from asserting any title or claim to the real estate in this action.


Girard Kasubick, Esq.,
Attorney for Plaintiff

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

BRIAN R. GRUBBS,
Plaintiff

vs.

LOUIS ERICKSON a/k/a LARS
ERICKSON a/k/a LARS ERICKSON
FLODIN and CHRISTINA ERICKSON
a/k/a CHRISTINA ERICKSON
FLODIN, his wife;

MARTHA CHRISTINA ERICKSON
FLODIN;

STEVE HOVAN a/k/a STEVE HOBAN
a/k/a STEVE HOVANEK and ANNA
HOVAN a/k/a ANNA HOBAN a/k/a
ANNA HOVANEK, his wife;

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

Defendants

:
: No.: 2006-1525-CD
: Type of Case:
: Quiet Title Action
: Type of Pleading:
: Order of Court
: Filed on behalf of:
: Plaintiff
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED ^{ice}
09:30/61 Amy Kasubick
NOV 01 2006 @K

William A. Shaw
Prothonotary/Clerk of Courts

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

| | | |
|-------------------------|---|--------------------|
| BRIAN R. GRUBBS, | : | |
| Plaintiff | : | No.: 2006-1525-CD |
| | : | |
| vs. | : | QUIET TITLE ACTION |
| | : | |
| LOUIS ERICKSON, ET AL., | : | |
| Defendants | : | |

ORDER OF COURT

NOW, this 31 day of October, 2006, an Affidavit having been made that service was made by publication on all unknown Defendants in the Clearfield Progress on September 28, 2006, and in the Clearfield County Legal Journal the week of October 6, 2006, and it appearing that it was impossible to serve any other Defendants by any other means,

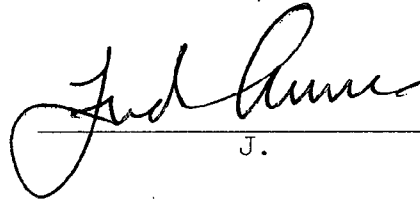
IT IS ORDERED AND DECREED that Defendants file suit in ejectment or otherwise enter a proceeding to contest the case within thirty (30) days, or this Order of Court shall become final upon praecipe by Plaintiff, which hereby Orders and Decrees that title to the land subject of this action is vested absolutely in the Plaintiff, his heirs and assigns, free and clear of any and all claims of any nature by any of the named Defendants, their heirs, executors, administrators, trustees, successors and assigns or by anyone claiming by, through or under them or any of them, and that the Plaintiff is seized of an

indefeasible title to that certain piece or parcel of land located in Morris Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of a sixteen foot alley; thence along said alley South eighty-nine degrees East one hundred and two and five tenths (102.5) feet to post; thence by said alley and lands of Alex Larson, North three degrees and thirty minutes West one hundred and eighty-six feet (186) to post; thence by another alley South eighty-five degrees and thirty minutes West eighty-seven and six tenths (87.6) feet to post; thence by lands of August Bloomquest (now Hovan) South thirty minutes East one hundred and eighty-five and eight tenths (185.8) feet to post and point of beginning. CONTAINING four hundred and five one thousands of one acre.

The above property is a part of Clearfield County Tax Map No. 124-R09-543-13.

BY THE COURT,


J.

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

BRIAN R. GRUBBS,
Plaintiff

vs.

LOUIS ERICKSON a/k/a LARS
ERICKSON a/k/a LARS ERICKSON
FLODIN and CHRISTINA ERICKSON
a/k/a CHRISTINA ERICKSON
FLODIN, his wife;

MARTHA CHRISTINA ERICKSON
FLODIN;

STEVE HOVAN a/k/a STEVE HOBAN
a/k/a STEVE HOVANEK and ANNA
HOVAN a/k/a ANNA HOBAN a/k/a
ANNA HOVANEK, his wife;

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

Defendants

:
: No.: 2006-1525-CD
: Type of Case:
: Quiet Title Action
: Type of Pleading:
: Final Praecipe
: Filed on behalf of:
: Plaintiff
: Counsel of Record For
: This Party:
: Girard Kasubick, Esq.
: Supreme Court #30109
: 611 Brisbin Street
: Houtzdale, PA 16651

FILED No. CC
DEC 04 2006 6P

William A. Shaw
Prothonotary/Clerk of Courts

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

BRIAN R. GRUBBS,
Plaintiff

vs.

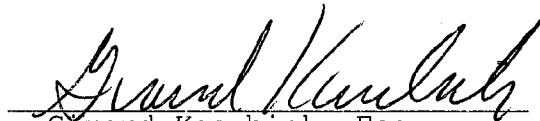
LOUIS ERICKSON, ET AL.,
Defendants

:
: No.: 2006-1525-CD
:
: QUIET TITLE ACTION
:
:

FINAL PRAECIPE

TO: William A. Shaw, Prothonotary:

Please enter judgment in the above-captioned matter
in favor of the Plaintiff.


Girard Kasubick, Esq.,
Attorney for Plaintiff

Dated: December 4, 2006