

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC

Plaintiff,

vs.

GERALD D. GRUBB, ELENA GRUBB,
BEVERLY J. GRUBB, ANTHONY E.
BUSA, JR. and MARY F. BUSA

Defendants

NO. 06-2123 C.D.

Type of Case:
ACTION TO QUIET TITLE

Type of Pleading:
COMPLAINT

Filed on Behalf of: PLAINTIFF

Counsel of Record:
CHRISTOPHER E. MOHNEY, ESQUIRE

Supreme Court No.: 63494

25 EAST PARK AVENUE
SUITE 6
DUBOIS, PA 15801
(814) 375-1044

April 12, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

FILED PIF pd. 85.00
DEC 22 2006
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC	:	NO. 06 -	- C.D.
	:		
	:		
Plaintiff,	:	ACTION TO QUIET TITLE	
	:		
vs.	:		
	:		
GERALD D. GRUBB, ELENA GRUBB,	:		
BEVERLY J. GRUBB, ANTHONY E.	:		
BUSA, JR. AND MARY F. GRUBB	:		
	:		
	:		
Defendants	:		

NOTICE

TO: GERALD D. GRUBB, BEVERLY J. GRUBB, ELENA GRUBB, ANTHONY E. BUSA,
JR., AND MARY F. BUSA

YOU ARE HEREBY NOTIFIED THAT AN ACTION TO QUIET TITLE TO PREMISES SITUATE IN SANDY TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, HAVE BEEN FILED AGAINST YOU. SAID PREMISES ARE DESCRIBED AS FOLLOWS:

ALL that certain tract of land designated as Lot No. 95, Section No. 8, "Santa Catalina" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights-of-way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declarations of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

The land subject of this quiet title is also Tax Map No. 128-21-C2-8-95.

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 CLAIM 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.

CLEARFIELD COUNTY PROTHONOTARY
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641 x 5982

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC	:	NO. 06 -	- C.D.
	:		
	:		
Plaintiff,	:	ACTION TO QUIET TITLE	
	:		
vs.	:		
	:		
GERALD D. GRUBB, ELENA GRUBB,	:		
BEVERLY J. GRUBB, ANTHONY E.	:		
BUSA, JR. AND MARY F. GRUBB	:		
	:		
	:		
Defendants.	:		

COMPLAINT

AND NOW, comes the Plaintiff *S & SP DEVELOPMENT, LLC*, by and through its attorney, *CHRISTOPHER E. MOHNEY, ESQUIRE*, and brings this Action to Quiet Title to the premises hereinafter described against the above-named Defendants, and in support thereof avers:

1. Plaintiff S & SP DEVELOPMENT, LLC is a Pennsylvania limited liability company with an address at 1047 Treasure Lake, DuBois, Clearfield County, Pennsylvania, 15801.
2. Defendants GERALD D. GRUBB and ELENA GRUBB are husband and wife, and are adult individuals with a last known address of R.D. #1, Box 353, Huntingdon, PA 16652.
3. Defendant BEVERLY J. GRUBB is an adult individual with a last known address of 7722 North Kings Highway, Myrtle Beach, SC 29572.
4. Defendant ANTHONY E. BUSA, JR. is an adult individual with a last known address of 32 Prospect, Wareham, MA 02571.

5. Defendant MARY F. BUSA is an adult individual with a last known address of 38 Weir Road, Yarmouth Port, MA 02675.

6. The purpose of this action is to quiet title to the following described real estate:

ALL that certain tract of land designated as Lot No. 95, Section No. 8, "Santa Catalina" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights-of-way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declarations of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

The land subject of this quiet title is also Tax Map No. 128-21-C2-8-95.

7. By Deed dated August 26, 1969, and recorded in Clearfield County Deed Book Volume 619, Page 106, Treasure Lake, Inc. conveyed the above-described property to GERALD D. GRUBB and BEVERLY J. GRUBB and ANTHONY E. BUSA, JR. and MARY F. BUSA.

8. By Deed dated February 23, 2006, and recorded in Clearfield County Recorder of Deeds office as Instrument #200602856, the Tax Claim Bureau of Clearfield County, Pennsylvania, conveyed the above-described property to S & SP DEVELOPMENT, LLC, the land being sold out from under GERALD D. GRUBB, BEVERLY J. GRUBB, ANTHONY E. BURSA [sic] & MARY F. BUSA for unpaid taxes against the above-described property.

9. No third party has ever made any claim of any kind to ownership of interest and/or claim to or upon the property except as set forth in this Complaint.

10. Plaintiff is unaware of any right, title or interest claimed by the named Defendants.

11. Plaintiff has been informed and therefore believes that the Defendants may have a claim or interest adverse to the Plaintiff. Any claims of the Defendants are without any right whatsoever, and Defendants' potential claims are wholly without right and constitute clouds on the Plaintiff's title, which Plaintiff desires to remove.

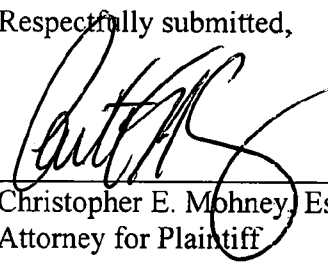
12. This action is brought to clear any and all clouds on the title to the ownership in interest to the property described in paragraph 6 of this Complaint, which the herein named Defendants might claim, possess or assert pertaining to any alleged irregularities in the chain of title herein set forth.

13. This suit to quiet title is instituted under the terms and provisions of the Pennsylvania Rules of Civil Procedure 1061 to 1067, inclusive, pertaining to the quieting of titles and other pertinent rules of local procedure.

WHEREFORE, your Plaintiff requests this Honorable Court to decree that title to the above-described property in paragraph 6 of this Complaint is in the name of S & SP DEVELOPMENT, and that the Defendants be forever barred from asserting any right, title, lien or interest in the land in question that is inconsistent with the interest of the Plaintiff as set forth herein to the said premises, or impeaching, denying or in any way attacking the Plaintiff's title to the said premises; and that your Honorable Court make any other necessary Order for the granting of proper relief as it deems necessary to equitably and legally recognize and preserve Plaintiff's rights in this matter.

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "C. Mohnhey", is written over a horizontal line.

Christopher E. Mohnhey, Esquire
Attorney for Plaintiff

VERIFICATION

I, Shawn Pardee of S & SP DEVELOPMENT, LLC, being a member thereof of being duly authorized to make this verification, have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

S & SP DEVELOPMENT, LLC

By: Shawn Pardee

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102282
NO: 06-2123-CD
SERVICE # 1 OF 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: S & SP DEVELOPMENT, LLC
vs.
DEFENDANT: GERALD D. GRUBB, ELENA GRUBB al

SHERIFF RETURN

NOW, January 03, 2007, SHERIFF OF HUNTINGDON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON GERALD D. GRUBB.

NOW, January 11, 2007 AT 1:35 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON GERALD D. GRUBB, DEFENDANT. THE RETURN OF HUNTINGDON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

FILED
01/31/06
MAR 20 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102282
NO: 06-2123-CD
SERVICE # 2 OF 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: S & SP DEVELOPMENT, LLC
vs.
DEFENDANT: GERALD D. GRUBB, ELENA GRUBB al

SHERIFF RETURN

NOW, January 03, 2007, SHERIFF OF HUNTINGDON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ELENA GRUBB.

NOW, January 12, 2007 AT 11:03 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ELENA GRUBB, DEFENDANT. THE RETURN OF HUNTINGDON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102282
NO: 06-2123-CD
SERVICES 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: S & SP DEVELOPMENT, LLC

vs.

DEFENDANT: GERALD D. GRUBB, ELENA GRUBB al

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	S.&SP DEVELOP.	794	20.00
SHERIFF HAWKINS	S.&SP DEVELOP.	794	18.39
HUNTINGDON CO.	S.&SP DEVELOP.	795	44.80

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,


by 

Chester A. Hawkins
Sheriff



SHERIFF'S OFFICE

HUNTINGDON COUNTY, PENNSYLVANIA

241 Mifflin Street
Huntingdon, PA 16652
Telephone: 814-643-0880
William G. Walters, Sheriff

S & SP Development, LLC

No. 2123 - CD

Term: 2006

Vs.

Gerald D. Grubb and Elena Grubb

Now, this 11th day of January, 2007, at 1335 A.M./P.M. I served the within
Complaint - Action to Quiet Title upon
Gerald D. Grubb at
Huntingdon County Sheriff's Office, 241 Mifflin Street, Huntingdon, PA 16652
by handing to Gerald D. Grubb, personally
one true and correct copy/copies of the within Complaint - Action to Quiet Title
and made known to Gerald D. Grubb
the contents thereof.

Sworn and subscribed to
before me this 22nd

day of January
2007, A.D.

Tammy S. Foor
Prothonotary/Notary Public

NOTARIAL SEAL
Tammy S. Foor, Notary Public
Huntingdon Borough, Huntingdon County
My commission expires October 21, 2010

So Answers,

William G. Walters

William G. Walters, Sheriff

Mark B. Foor
Chief Deputy Mark B. Foor

Chief Deputy/Deputy

Costs:

Rec. & Doc.	<u>\$9.00</u>
Service	<u>\$15.00</u>
Mileage/Postage	<u>\$10.80</u>
Surcharge	<u>---</u>
Affidavit	<u>\$10.00</u>
Miscellaneous	<u>---</u>
Total Costs	<u>\$44.80 Paid</u>



SHERIFF'S OFFICE

HUNTINGDON COUNTY, PENNSYLVANIA

241 Mifflin Street
Huntingdon, PA 16652
Telephone: 814-643-0880
William G. Walters, Sheriff

S & SP Development, LLC

No. 2123 - CD

Term: 2006

Vs.

Gerald D. Grubb and Elena Grubb

Now, this 12th day of January, 2007, at 1103 A.M./P.M. I served the within
Complaint - Action to Quiet Title upon
Elena Grubb at
Rr 1 Box 353, Huntingdon, PA 16652
by handing to Elena Grubb, personally
one true and correct copy/copies of the within Complaint - Action to Quiet Title
and made known to Elena Grubb
the contents thereof.

So Answers,

Sworn and subscribed to
before me this 20th

day of January
2007, A.D.

Tammy S. Foor
Prothonotary/Notary Public

NOTARIAL SEAL
Tammy S. Foor, Notary Public
Huntingdon Borough, Huntingdon County
My commission expires October 21, 2010

William G. Walters
William G. Walters, Sheriff

Chris B. Metrick
Deputy Chris B. Metrick

Chief Deputy/Deputy

Costs:

Rec. & Doc.	<u>See</u>
Service	<u>---</u>
Mileage/Postage	<u>First</u>
Surcharge	<u>---</u>
Affidavit	<u>Entry</u>
Miscellaneous	<u>---</u>
Total Costs	<u>See First Entry Paid</u>



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641 EXT. 5986

FAX (814) 765-5915

ROBERT SNYDER
CHIEF DEPUTY

MARILYN HAMM
DEPT. CLERK

CYNTHIA AUGHENBAUGH
OFFICE MANAGER

KAREN BAUGHMAN
CLERK TYPIST

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 102282

S & SP DEVELOPMENT, LLC

VS.

GERALD D. GRUBB, ELENA GRUBB al

TERM & NO. 06-2123-CD

COMPLAINT ACTION TO QUIET TITLE

SERVE BY: 01/21/07

MAKE REFUND PAYABLE TO S.&SP DEVELOPMENT, LLC

SERVE: GERALD D. GRUBB

ADDRESS: RD#1 BOX 353, HUNTINGDON, PA 16652

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF HUNTINGDON COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, January 03, 2007.

RESPECTFULLY,

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641 EXT. 5986
FAX (814) 765-5915

ROBERT SNYDER
CHIEF DEPUTY

MARILYN HAMM
DEPT. CLERK

CYNTHIA AUGHENBAUGH
OFFICE MANAGER

KAREN BAUGHMAN
CLERK TYPIST

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 102282

TERM & NO. 06-2123-CD

S & SP DEVELOPMENT, LLC

COMPLAINT ACTION TO QUIET TITLE

vs.

GERALD D. GRUBB, ELENA GRUBB al

SERVE BY: 01/21/07

MAKE REFUND PAYABLE TO S.&SP DEVELOPMENT, LLC

SERVE: ELENA GRUBB

ADDRESS: RD#1 BOX 353, HUNTINGDON, PA 16652

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF HUNTINGDON COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, January 03, 2007.

RESPECTFULLY,

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC.,

Plaintiff,

vs.

GERALD D. GRUBB, ELENA GRUBB,
BEVERLY J. GRUBB, ANTHONY E.
BUSA, JR. and MARY F. BUSA,

Defendants.

: NO. 06-2123-C.D.

:

: Type of Case:

: ACTION TO QUIET TITLE

:

: Type of Pleading: PRAECIPE TO

: REINSTATE COMPLAINT

:

: Filed on Behalf of: PLAINTIFF

: S & SP DEVELOPMENT, LLC.

:

: Counsel of Record:

: CHRISTOPHER E. MOHNEY, ESQUIRE

:

: Supreme Court No.: 63494

:

: 25 EAST PARK AVENUE, SUITE 6

: DUBOIS, PA 15801

: (814) 375-1044

FILED
01/10/19/30
APR 12 2007

William A. Shaw
Prothonotary/Clerk of Courts

Atty pd. 7.00
1 Compl. - Reinstated
to Atty.

Supreme Court No. 63494
25 East Park Avenue, Suite 6
DuBois, PA 15801
(814) 375-1044

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,

PLAINTIFF

VS.

GERALD D. GRUBB, ELENA
GRUBB, BEVERLY J. GRUBB,
ANTHONY E. BUSA, JR. and
MARY F. BUSA,

DEFENDANT

CIVIL ACTION - LAW

NO. 06-2123-C.D.

TYPE OF CASE: ACTION TO QUIET
TITLE

TYPE OF PLEADING:
AFFIDAVIT OF SERVICE

FILED ON BEHALF OF: PLAINTIFF

COUNSEL OF RECORD:
CHRISTOPHER E. MOHNEY, ESQUIRE

SUPREME COURT NO.: 63494

CHRISTOPHER E. MOHNEY, ESQUIRE
25 EAST PARK AVENUE, SUITE 6
DUBOIS, PA 15801
(814) 375-1044

FILED No CC
MAY 03 2007
LM

William A. Shaw
Prothonotary/Clerk of Courts

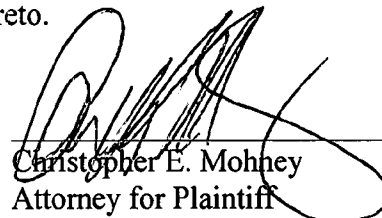
IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION – LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	
	:	
GERALD D. GRUBB, ELENA	:	
GRUBB, BEVERLY J. GRUBB,	:	
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	
	:	
DEFENDANT	:	

AFFIDAVIT OF SERVICE

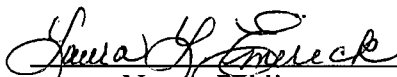
COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

CHRISTOPHER E. MOHNEY, being duly sworn according to law, deposes and says that as attorney for Plaintiff **S & SP DEVELOPMENT, LLC.** in the above captioned action, he did serve a certified true and correct copy of reinstated Complaint in Action to Quiet Title on the Defendant Anthony E. Busa, Jr. by certified mail, return receipt requested at c/o Julie Roth, 11 Pinnacle Lane, Yarmouth Port, MA 02675, with the return address of Plaintiff's counsel appearing thereon, on April 18, 2007, as is evidenced by copy of the return receipt attached hereto.



Christopher E. Mohney
Attorney for Plaintiff

Sworn To and Subscribed
before me this 2nd day of
May, 2007



Notary Public
NOTARIAL SEAL
Laura L. Emerick, Notary Public
DuBois, Clearfield County
My commission expires May 18, 2008

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION - LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	
	:	
GERALD D. GRUBB, ELENA	:	TYPE OF CASE: ACTION TO QUIET
GRUBB, BEVERLY J. GRUBB,	:	TITLE
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	TYPE OF PLEADING:
	:	AFFIDAVIT OF SERVICE
DEFENDANT	:	
	:	FILED ON BEHALF OF: PLAINTIFF
	:	
	:	COUNSEL OF RECORD:
	:	CHRISTOPHER E. MOHNEY, ESQUIRE
	:	
	:	SUPREME COURT NO.: 63494
	:	
	:	CHRISTOPHER E. MOHNEY, ESQUIRE
	:	25 EAST PARK AVENUE, SUITE 6
	:	DUBOIS, PA 15801
	:	(814) 375-1044

FILED No cc
p/g: 4/6/07
MAY 11 2007
William A. Shaw
Prothonotary/Clerk of Courts


IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION – LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	
	:	
GERALD D. GRUBB, ELENA	:	
GRUBB, BEVERLY J. GRUBB,	:	
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	
	:	
DEFENDANT	:	

AFFIDAVIT OF SERVICE

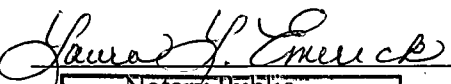
COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

CHRISTOPHER E. MOHNEY, being duly sworn according to law, deposes and says that as attorney for Plaintiff **S & SP DEVELOPMENT, LLC.** in the above captioned action, he did serve a certified true and correct copy of reinstated Complaint in Action to Quiet Title on the Defendant Anthony E. Busa, Jr. by certified mail, return receipt requested at c/o Julie Roth, 11 Pinnacle Lane, Yarmouth Port, MA 02675, with the return address of Plaintiff's counsel appearing thereon, on April 18, 2007, as is evidenced by copy of the return receipt attached hereto.



Christopher E. Mohney
Attorney for Plaintiff

Sworn To and Subscribed
before me this 7th day of
May, 2007



Notary Public
Laura L. Emerick, Notary Public
DuBois, Clearfield County
My commission expires May 18, 2008

7004 0750 0000 8595 6103

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	\$ 1.63
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	1.85
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.88

Postmark
Here

Sent To
 Mr. Anthony E. Busa, Jr.
 Street, Apt. No.,
 or PO Box No. c/o Julie Roth
 11 Pinnacle Lane
 City, State, ZIP+4
 Yarmouth Port, MA 02675

PS Form 3800, June 2002 See Reverse for Instructions

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.

1. Article Addressed to:

Mr. Anthony E. Busa, Jr.
 c/o Julie Roth
 11 Pinnacle Lane
 Yarmouth Port, MA 02675

QTA

2. Article Number
 (Transfer from service label)

7004 0750 0000 8595 6103

PS 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)
 C. Date of Delivery
 4-18

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

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION - LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	
	:	TYPE OF CASE: ACTION TO QUIET
GERALD D. GRUBB, ELENA	:	TITLE
GRUBB, BEVERLY J. GRUBB,	:	
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	TYPE OF PLEADING:
	:	AFFIDAVIT OF SERVICE
DEFENDANT	:	
	:	FILED ON BEHALF OF: PLAINTIFF
	:	
	:	COUNSEL OF RECORD:
	:	CHRISTOPHER E. MOHNEY, ESQUIRE
	:	
	:	SUPREME COURT NO.: 63494
	:	
	:	CHRISTOPHER E. MOHNEY, ESQUIRE
	:	25 EAST PARK AVENUE, SUITE 6
	:	DUBOIS, PA 15801
	:	(814) 375-1044

FILED *no cc*
JUN 11 2007
19:32

William A. Shaw
Prothonotary/Clerk of Courts

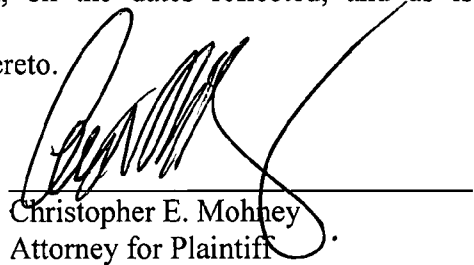
IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION – LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	
	:	
GERALD D. GRUBB, ELENA	:	
GRUBB, BEVERLY J. GRUBB,	:	
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	
	:	
DEFENDANT	:	

AFFIDAVIT OF SERVICE


COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

CHRISTOPHER E. MOHNEY, ESQUIRE, being duly sworn according to law, deposes and says that as attorney for Plaintiff **S & SP DEVELOPMENT, LLC.** in the above captioned action, he did serve a certified true and correct copy of Complaint in Action to Quiet Title on the Defendants **MARY F. BUSA, BEVERLY J. GRUBB**, and **ANTHONY E. BUSA, JR.** by certified mail, return receipt requested, with the return address of Plaintiff's counsel appearing thereon, on the dates reflected, and as is evidenced by copy of the return receipts attached hereto.



Christopher E. Mohney
Attorney for Plaintiff

Sworn To and Subscribed
before me this 7th day of
June, 2007



Notary Public
NOTARIAL SEAL
Laura L. Emerick, Notary Public
DuBois, Clearfield County
My commission expires May 18, 2008

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.

1. Article Addressed to:

Ms. Mary F. Busa
28 Weir Road
Yarmouth Port, MA 02675

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Age☐ Addr.

B. Received by (Printed Name)

C. Date of Deliv

D. Is delivery address different from item 1? ☐ YesIf 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

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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 \$.87

Certified Fee 2.40

Return Receipt Fee (Endorsement Required) 1.85

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$5.12

Postmark
Here

330

Sent To

Ms. Mary F. Busa

Street, Apt. No.,

or P.O. Box Weir Road

City, State, ZIP+4 Yarmouth Port, MA 02675

PS Form 3800, June 2002

See Reverse for Instructions

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 \$.87

Certified Fee 2.40

Return Receipt Fee (Endorsement Required) 1.85

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$5.12

Postmark
Here

330

Sent To

Ms. Beverly J. Grubb

Street, Apt. No., North Kings Highway

or P.O. Box No. Myrtle Beach, SC 29572

City, State, ZIP+4

PS Form 3800, June 2002

See Reverse for Instructions

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.

1. Article Addressed to:

Ms. Beverly J. Grubb
7722 North Kings Highway
Myrtle Beach, SC 29572

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

☒ Certified Mail ☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

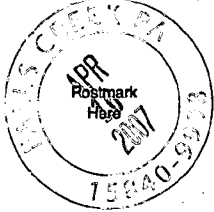
4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>						
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	<table border="1"> <tr><td>\$ 1.63</td></tr> <tr><td>2.40</td></tr> <tr><td>1.85</td></tr> <tr><td></td></tr> <tr><td>\$ 4.88</td></tr> </table>	\$ 1.63	2.40	1.85		\$ 4.88
\$ 1.63						
2.40						
1.85						
\$ 4.88						
<div style="text-align: right;">  </div>						
Sent To Mr. Anthony E. Busa, Jr. Street, Apt. No.; or PO Box No. c/o Julie Roth 11 Pinnacle Lane City, State, ZIP+4 Yarmouth Port, MA 02675						
PS Form 3800, June 2002 See Reverse for Instructions						

SENDER: COMPLETE THIS SECTION <ul style="list-style-type: none"> 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. <p>1. Article Addressed to:</p> <p>Mr. Anthony E. Busa, Jr. c/o Julie Roth 11 Pinnacle Lane Yarmouth Port, MA 02675</p> <p>QTA</p> <p>2. Article Number (Transfer from service label)</p>	COMPLETE THIS SECTION ON DELIVERY <p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) [Signature]</p> <p>C. Date of Delivery 4-18</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
7004 0750 0000 8595 6103	
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540	

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC.,

Plaintiff,

vs.

GERALD D. GRUBB, ELENA GRUBB,
BEVERLY J. GRUBB, ANTHONY E.
BUSA, JR. and MARY F. BUSA,

Defendants.

: NO. 06-2123-C.D.

:

: Type of Case:

: ACTION TO QUIET TITLE

:

: Type of Pleading: MOTION FOR

: DEFAULT JUDGMENT

:

: Filed on Behalf of: PLAINTIFF

: S & SP DEVELOPMENT, LLC.

:

: Counsel of Record:

: CHRISTOPHER E. MOHNEY,

: ESQUIRE

:

: Supreme Court No.: 63494

:

: 25 EAST PARK AVENUE, SUITE 6

: DUBOIS, PA 15801

: (814) 375-1044

FILED ^{NP CC}
m19:326D
JUN 11 2007 (64)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC.,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	NO. 06-2123-C.D.
	:	
GERALD D. GRUBB, ELENA GRUBB,	:	
BEVERLY J. GRUBB, ANTHONY E.	:	
BUSA, JR. and MARY F. BUSA,	:	
	:	
Defendants.	:	

MOTION FOR DEFAULT JUDGMENT

AND NOW, comes the Plaintiff, *S & SP DEVELOPMENT, LLC*, by and through its attorney, *CHRISTOPHER E. MOHNEY, ESQUIRE*, and files this Motion for Default Judgment against Defendants *GERALD D. GRUBB, ELENA GRUBB, BEVERLY J. GRUBB, ANTHONY E. BUSA, JR. and MARY F. BUSA*, and in support thereof avers as follows:

1. This is an action to quiet title in which Plaintiff, S & SP Development, LLC requests that Defendants Gerald D. Grubb, Elena Grubb, Beverly J. Grubb, Anthony E. Busa, Jr. and Mary F. Busa be permanently enjoined and restrained from asserting any claim or interest in or to real property described in Plaintiff's Complaint. A true and correct copy of the Plaintiff's Complaint is attached hereto, incorporated herein by reference, and marked Exhibit "A".

2. Attached as Exhibit "B" is Sheriff's Return and Affidavit of Service verifying that the Complaint to Quiet Title filed by Plaintiff on or about December 22, 2006 was served on all defendants.

3. No defendant has filed an answer to the Complaint, nor has any defendant entered an appearance of record.

4. Attached as Exhibit "C" are copies of Important Notices sent to the respective defendants, which Important Notices were sent on May 22, 2007, as evidenced by the attached Certificates of Mailing.

5. Pa. R.C.P. §1066(a) allows the Court to grant appropriate relief on Affidavit that a Complaint containing a Notice to Defend has been served and Defendants have not filed an answer.

WHEREFORE, Plaintiff requests this Court to enter an Order of Default Judgment against Defendants, Gerald D. Grubb, Elena Grubb, Beverly J. Grubb, Anthony E. Busa, Jr. and Mary F. Busa, pursuant to Pa. R.C.P. §1066(a).

Respectfully submitted,

By: 

Christopher E. Mohney, Esquire
Attorney for Plaintiff S & SP
Development, LLC

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

S & SP DEVELOPMENT, LLC

Plaintiff,

vs.

GERALD D. GRUBB, ELENA GRUBB,
BEVERLY J. GRUBB, ANTHONY E.
BUSA, JR. and MARY F. BUSA

Defendants

NO. 06 ~~2123~~ C.D.

Type of Case:
ACTION TO QUIET TITLE

Type of Pleading:
COMPLAINT

Filed on Behalf of: PLAINTIFF

Counsel of Record:
CHRISTOPHER E. MOHNEY, ESQUIRE

Supreme Court No.: 63494

25 EAST PARK AVENUE
SUITE 6
DUBOIS, PA 15801
(814) 375-1044

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

DEC 22 2006

Attest.

William H. H.
Prothonotary/
Clerk of Courts

Exhibit "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC	:	NO. 06 -	- C.D.
	:		
	:		
Plaintiff,	:	ACTION TO QUIET TITLE	
	:		
vs.	:		
	:		
GERALD D. GRUBB, ELENA GRUBB,	:		
BEVERLY J. GRUBB, ANTHONY E.	:		
BUSA, JR. AND MARY F. GRUBB	:		
	:		
	:		
Defendants	:		

NOTICE

TC: GERALD D. GRUBB, BEVERLY J. GRUBB, ELENA GRUBB, ANTHONY E. BUSA,
JR., AND MARY F. BUSA

YOU ARE HEREBY NOTIFIED THAT AN ACTION TO QUIET TITLE TO PREMISES SITUATE IN SANDY TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, HAVE BEEN FILED AGAINST YOU. SAID PREMISES ARE DESCRIBED AS FOLLOWS:

ALL that certain tract of land designated as Lot No. 95, Section No. 8, "Santa Catalina" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights-of-way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declarations of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

The land subject of this quiet title is also Tax Map No. 128-21-C2-8-95.

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 CLAIM 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.

CLEARFIELD COUNTY PROTHONOTARY
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641 x 5982

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC	:	NO. 06 -	- C.D.
	:		
	:		
Plaintiff,	:	ACTION TO QUIET TITLE	
	:		
vs.	:		
	:		
GERALD D. GRUBB, ELENA GRUBB,	:		
BEVERLY J. GRUBB, ANTHONY E.	:		
BUSA, JR. AND MARY F. GRUBB	:		
	:		
	:		
Defendants.	:		

COMPLAINT

AND NOW, comes the Plaintiff *S & SP DEVELOPMENT, LLC*, by and through its attorney, *CHRISTOPHER E. MOHNEY, ESQUIRE*, and brings this Action to Quiet Title to the premises hereinafter described against the above-named Defendants, and in support thereof avers:

1. Plaintiff S & SP DEVELOPMENT, LLC is a Pennsylvania limited liability company with an address at 1047 Treasure Lake, DuBois, Clearfield County, Pennsylvania, 15801.

2. Defendants GERALD D. GRUBB and ELENA GRUBB are husband and wife, and are adult individuals with a last known address of R.D. #1, Box 353, Huntingdon, PA 16652.

3. Defendant BEVERLY J. GRUBB is an adult individual with a last known address of 7722 North Kings Highway, Myrtle Beach, SC 29572.

4. Defendant ANTHONY E. BUSA, JR. is an adult individual with a last known address of 32 Prospect, Wareham, MA 02571.

5. Defendant MARY F. BUSA is an adult individual with a last known address of 38 Weir Road, Yarmouth Port, MA 02675.

6. The purpose of this action is to quiet title to the following described real estate:

ALL that certain tract of land designated as Lot No. 95, Section No. 8, "Santa Catalina" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights-of-way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declarations of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

The land subject of this quiet title is also Tax Map No. 128-21-C2-8-95.

7. By Deed dated August 26, 1969, and recorded in Clearfield County Deed Book Volume 619, Page 106, Treasure Lake, Inc. conveyed the above-described property to GERALD D. GRUBB and BEVERLY J. GRUBB and ANTHONY E. BUSA, JR. and MARY F. BUSA.

8. By Deed dated February 23, 2006, and recorded in Clearfield County Recorder of Deeds office as Instrument #200602856, the Tax Claim Bureau of Clearfield County, Pennsylvania, conveyed the above-described property to S & SP DEVELOPMENT, LLC, the land being sold out from under GERALD D. GRUBB, BEVERLY J. GRUBB, ANTHONY E. BURSA [*sic*] & MARY F. BUSA for unpaid taxes against the above-described property.

9. No third party has ever made any claim of any kind to ownership of interest and/or claim to or upon the property except as set forth in this Complaint.

10. Plaintiff is unaware of any right, title or interest claimed by the named Defendants.

11. Plaintiff has been informed and therefore believes that the Defendants may have a claim or interest adverse to the Plaintiff. Any claims of the Defendants are without any right whatsoever, and Defendants' potential claims are wholly without right and constitute clouds on the Plaintiff's title, which Plaintiff desires to remove.

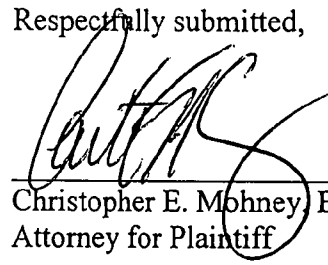
12. This action is brought to clear any and all clouds on the title to the ownership in interest to the property described in paragraph 6 of this Complaint, which the herein named Defendants might claim, possess or assert pertaining to any alleged irregularities in the chain of title herein set forth.

13. This suit to quiet title is instituted under the terms and provisions of the Pennsylvania Rules of Civil Procedure 1061 to 1067, inclusive, pertaining to the quieting of titles and other pertinent rules of local procedure.

WHEREFORE, your Plaintiff requests this Honorable Court to decree that title to the above-described property in paragraph 6 of this Complaint is in the name of S & SP DEVELOPMENT, and that the Defendants be forever barred from asserting any right, title, lien or interest in the land in question that is inconsistent with the interest of the Plaintiff as set forth herein to the said premises, or impeaching, denying or in any way attacking the Plaintiff's title to the said premises; and that your Honorable Court make any other necessary Order for the granting of proper relief as it deems necessary to equitably and legally recognize and preserve Plaintiff's rights in this matter.

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read 'C. Mohny', written over a horizontal line.

Christopher E. Mohny Esquire
Attorney for Plaintiff

VERIFICATION

I, Shawn Pardo of S & SP DEVELOPMENT, LLC, being a member thereof of being duly authorized to make this verification, have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

S & SP DEVELOPMENT, LLC

By:

Shawn Pardo

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102282
NO: 06-2123-CD
SERVICE # 1 OF 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: S & SP DEVELOPMENT, LLC
vs.
DEFENDANT: GERALD D. GRUBB, ELENA GRUBB al

COPY

SHERIFF RETURN

NOW, January 03, 2007, SHERIFF OF HUNTINGDON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON GERALD D. GRUBB.

NOW, January 11, 2007 AT 1:35 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON GERALD D. GRUBB, DEFENDANT. THE RETURN OF HUNTINGDON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

Exhibit "B"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102282
NO: 06-2123-CD
SERVICE # 2 OF 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: S & SP DEVELOPMENT, LLC
vs.
DEFENDANT: GERALD D. GRUBB, ELENA GRUBB al

SHERIFF RETURN

NOW, January 03, 2007, SHERIFF OF HUNTINGDON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ELENA GRUBB.

NOW, January 12, 2007 AT 11:03 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ELENA GRUBB, DEFENDANT. THE RETURN OF HUNTINGDON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102282
NO: 06-2123-CD
SERVICES 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: S & SP DEVELOPMENT, LLC
vs.
DEFENDANT: GERALD D. GRUBB, ELENA GRUBB al

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	S.&SP DEVELOP.	794	20.00
SHERIFF HAWKINS	S.&SP DEVELOP.	794	18.39
HUNTINGDON CO.	S.&SP DEVELOP.	795	44.80

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,



Chester A. Hawkins
Sheriff



SHERIFF'S OFFICE

HUNTINGDON COUNTY, PENNSYLVANIA

241 Mifflin Street
Huntingdon, PA 16652
Telephone: 814-643-0880
William G. Walters, Sheriff

S & SP Development, LLC

No. 2123 - CD

Term: 2006

Vs.

Gerald D. Grubb and Elena Grubb

Now, this 11th day of January, 2007, at 1335 A.M./P.M. I served the within
Complaint - Action to Quiet Title upon
Gerald D. Grubb at
Huntingdon County Sheriff's Office, 241 Mifflin Street, Huntingdon, PA 16652
by handing to Gerald D. Grubb, personally
one true and correct copy/copies of the within Complaint - Action to Quiet Title
and made known to Gerald D. Grubb
the contents thereof.

Sworn and subscribed to
before me this 22nd

day of January
2007, A.D.

Tammy S. Foor
Prothonotary/Notary Public

NOTARIAL SEAL
Tammy S. Foor, Notary Public
Huntingdon Borough, Huntingdon County
My commission expires October 21, 2010

So Answers,

William G. Walters
William G. Walters, Sheriff

Mark B. Foor
Chief Deputy Mark B. Foor

Chief Deputy/Deputy

Costs:

Rec. & Doc.	\$9.00
Service	\$15.00
Mileage/Postage	\$10.80
Surcharge	---
Affidavit	\$10.00
Miscellaneous	---
Total Costs	\$44.80 Paid



SHERIFF'S OFFICE

HUNTINGDON COUNTY, PENNSYLVANIA

241 Mifflin Street
Huntingdon, PA 16652
Telephone: 814-643-0880
William G. Walters, Sheriff

S & SP Development, LLC

No. 2123-LGD

Term 2006

V. 8

Gerald D. Grubb and Elena Grubb

Now, this 12th day of January, 2007, at 1103 A.M./P.M. I served the within
Complaint - Action to Quiet Title upon
Elena Grubb at
Rr 1 Box 353, Huntingdon, PA 16652
by handing to Elena Grubb, personally
one true and correct copy/copies of the within Complaint - Action to Quiet Title
and made known to Elena Grubb
the contents thereof.

So Answers,

William G. Walters
William G. Walters, Sheriff
Chris B. Metrick
Deputy Chris B. Metrick
Chief Deputy/Deputy

Sworn and subscribed to
before me this 29
day of January
2007, A.D.

Tammy S. Foor
Prothonotary/Notary Public

NOTARIAL SEAL
Tammy S. Foor, Notary Public
Huntingdon Borough, Huntingdon County
My commission expires October 21, 2010

Costs:

Rec. & Doc.	See
Service	---
Mileage/Postage	First
Surcharge	---
Affidavit	Entry
Miscellaneous	---

Total Costs See First Entry Paid

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION - LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	TYPE OF CASE: ACTION TO
	:	QUIET TITLE
GERALD D. GRUBB, ELENA	:	
GRUBB, BEVERLY J. GRUBB,	:	
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	
	:	
DEFENDANT	:	

TO: BEVERLY J. GRUBB
7722 North Kings Highway
Myrtle Beach, SC 29572

DATE OF NOTICE: May 22, 2007

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 (10) 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD, PA 16830
(814) 765-2641

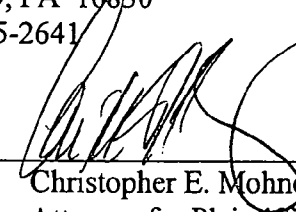
BY: 
Christopher E. Mohnhey, Esquire
Attorney for Plaintiff
I.D. #63494
25 East Park Avenue, Suite 6
DuBois, PA 15801
(814) 375-1044

Exhibit "C"

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

S & SP DEVELOPMENT, LLC.,	:	CIVIL ACTION - LAW
	:	
PLAINTIFF	:	NO. 06-2123-C.D.
	:	
VS.	:	TYPE OF CASE: ACTION TO
	:	QUIET TITLE
GERALD D. GRUBB, ELENA	:	
GRUBB, BEVERLY J. GRUBB,	:	
ANTHONY E. BUSA, JR. and	:	
MARY F. BUSA,	:	
	:	
DEFENDANT	:	

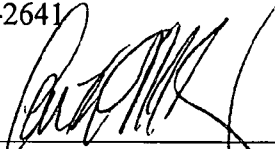
TO: ANTHONY E. BUSA, JR.
c/o Julie Roth
11 Pinnacle Lane
Yarmouth, MA 02675

DATE OF NOTICE: May 22, 2007

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 (10) 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD, PA 16830
(814) 765-2641

BY: 
Christopher E. Mohnhey, Esquire
Attorney for Plaintiff
I.D. #63494
25 East Park Avenue, Suite 6
DuBois, PA 15801
(814) 375-1044

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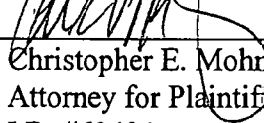
TO: MARY BUSA
28 Weir Road
Yarmouth, MA 02675

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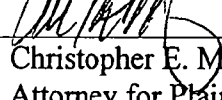
TO: ELENA GRUBB
R. R. #1, Box 353
Huntingdon, PA 16652

DATE OF NOTICE: May 22, 2007

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CLEARFIELD, PA 16830
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TO: GERALD D. GRUBB
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DATE OF NOTICE: May 22, 2007



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BY: 

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Attorney for Plaintiff
I.D. #63494
25 East Park Avenue, Suite 6
DuBois, PA 15801
(814) 375-1044

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE PROVIDED		One piece of ordinary mail addressed to:	
Christopher E. Mohny, Esquire Suite 6 25 East Park Avenue DuBois, PA 15801		R. R. #1, Box 353 Huntingdon, PA 16652	
 USA 24 Common Buckeye		 USA First-Class	

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE PROVIDED		One piece of ordinary mail addressed to:	
Christopher E. Mohny, Esquire Suite 6 25 East Park Avenue DuBois, PA 15801		ELENA GRUBB R. R. #1, Box 353 Huntingdon, PA 16652	
 USA 24 Common Buckeye		 USA First-Class	

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE PROVIDED		One piece of ordinary mail addressed to:	
Christopher E. Mohny, Esquire Suite 6 25 East Park Avenue DuBois, PA 15801		BEVERLY J. GRUBB 7722 North Kings Highway Myrtle Beach, SC 29572	
 USA 24 Common Buckeye		 USA First-Class	

U.S. POSTAL SERVICE CERTIFICATE OF MAILING

MAY BE PROVIDED

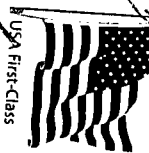
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USA 24



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USA 24



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION – AT LAW

S & SP DEVELOPMENT, LLC.,

Plaintiff,

vs.

GERALD D. GRUBB, ELENA GRUBB,
BEVERLY J. GRUBB, ANTHONY E.
BUSA, JR. and MARY F. BUSA,

Defendants.

FILED 2cc AH
0/2:45 cm Mohney
JUN 13 2007 (GP)

William A. Shaw
NO. 06-2123-C.D. Prothonotary/Clerk of Courts

ORDER

AND NOW, this 13 day of June, 2007, an Affidavit of Service and a Complaint with Notice to Plead having been filed and no answer having been made by Defendants Gerald D. Grubb, Elena Grubb, Beverly J. Grubb, Anthony E. Busa, Jr. and Mary F. Busa, upon consideration of the Motion for Default Judgment of Plaintiff pursuant to Pa. R.C.P. §1066(a), it is hereby **ORDERED and DECREED** that judgment by default be entered against Defendants Gerald D. Grubb, Elena Grubb, Beverly J. Grubb, Anthony E. Busa, Jr. and Mary F. Busa, directing that they are permanently enjoined and restrained from asserting and claim or interest in or to the following real property, or any part thereof:

ALL that certain tract of land designated as Lot No. 95, Section No. 8, "Santa Catalina", in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the office of the Recorder of Deeds of Clearfield County in Miscellaneous Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights-of-way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.

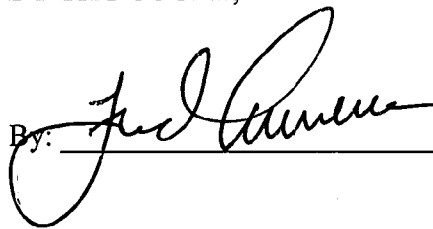
2. The Declarations of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

BEING the same premises which were conveyed to Gerald D. Grubb and Beverly J. Grubb, husband and wife, and Anthony E. Busa, Jr. and Mary F. Busa, husband and wife, by deed of Treasure Lake, Inc., dated August 26, 1969, and recorded in the Office of the Recorder of Deeds of Clearfield County, Pennsylvania, in Deed Book Vol. 619, page 106. For purposes of clarification of record title, the above described property was sold to the Grantee within by the Tax Claim Bureau of Clearfield County, Pennsylvania for delinquent taxes, and the purpose of this deed is to perfect record title to Grantee.

A copy of this Order shall be recorded in the office of the Recorder of Deeds of Clearfield County, Pennsylvania.

These proceedings, or any authenticated copy thereof, shall at all times be hereinafter taken as evidence of the facts declared and established thereby.

BY THE COURT,

By: 

DATE: 6-13-07

☒ You are responsible for serving all appropriate parties.

☐ The Prothonotary's office has provided service to the following parties:

☐ Plaintiff(s) ☐ Plaintiff(s) Attorney ☐ Other

☐ Defendant(s) ☐ Defendant(s) Attorney

☐ Special Instructions:

FILED

JUN 13 2007

William A. Shaw
Prothonotary/Clerk of Courts