

07-120-CD

Leslie Smith vs Velma Karadeema al

Leslie Smith vs Velma Karadeema
2007-120-CD

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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* NO. 07- 120 -C.D.

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* Type of Case: QUIET TITLE ACTION

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* Type of Pleading: COMPLAINT

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* Filed on behalf of: PLAINTIFF

LESLIE H. SMITH

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* Counsel of record for Plaintiff:

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* BARBARA J. HUGNEY-SHOPE

* ATTORNEY AT LAW ESQUIRE

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* Supreme Court I. D. No. 26274

* 23 North Second Street

* Clearfield, PA 16830

* (814) 765-5155

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FILED Attypol 95.00
09/07/07 14 CC
JAN 25 2007 AttyShoppe

William A. Shaw
Prothonotary/Clerk of Courts

June 26, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

Aug 1, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
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Defendants

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* NO. 07- -C.D.
* QUIET TITLE ACTION

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against these 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.

Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

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

LESLIE H. SMITH, a single adult,
Plaintiff

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vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
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TAMMY WELSH; ROBERT LeROY BEAN;
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NO. 07- -C.D.

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QUIET TITLE ACTION

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Defendants

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COMPLAINT

AND NOW COMES, the Plaintiff, LESLIE H. SMITH, who by and through his attorney, BARBARA J. HUGNEY-SHOPE, ESQUIRE, files this complaint to quiet the title to certain real estate and in support thereof avers as follows:

1. That the Plaintiff, LESLIE H. SMITH, is an adult individual, who resides at 385 LeContes Mills Road, Frenchville, Pennsylvania 16836.

2. That the Defendants are the sole surviving intestate heirs at law of Charlotte Bloom, who died intestate December 12, 1968:

- (a) Velma Karadeema whose last known address was 5956 Route 76, Ripley, New York 14775-9727; however, she is believed to be deceased and her heirs are unknown;
- (b) Doris (Loar) Snyder whose last known address was R.D. #2, Box 92 Mayport, PA 16240;
- (c) Joy Diane Beaudin whose last known address was R.R. #1, Box 14Mayport, PA 16240;
- (d) Karon Ann Newmeister whose last known address was P.O. Box 6581, Big Bear Lake, CA 92315;
- (e) Cindy Lee Welsh whose last known address was 437 7th Avenue Extension, Brockway, PA 15824;
- (f) Tammy Welsh whose last known address was 920 King Road, Brookville, PA 15825;
- (g) Robert LeRoy Bean whose last known address was 205 Shenks Ferry Road, Conastoga, PA 17516;
- (h) Keith A. Konnerth, Sr., whose last known address was 1403 W. 18th Street, Lorain, Ohio 44052;

(i) Robert A. Konnerth, Jr., whose last known address was 9315 Dorothy Drive, Streetsboro, Ohio 44241;

(j) David S. Konnerth whose last known address was P.O. Box 667, St. Petersburg, FL 33713; and

(k) Kathy A. Hutter whose last known address was 23768 Sunset Crossing Road, Diamond Bar, CA 91765.

3. That the Plaintiff is currently the owner of a certain piece or parcel of land situate in the Borough of Troutville, Clearfield County, Pennsylvania, hereinafter referred to as the "Premises" conveyed to him as joint tenant with right of survivorship with Andy Bloom by deed of Andy Bloom dated March 26, 1998, and recorded in Clearfield County Deeds and Records Book 1929, page 519 bounded and described as follows:

ALL that parcel or tract of land lying and being situate in the Borough of Troutville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a one-inch iron pipe set by this survey, said iron pipe being along the northern right-of-way line for S.R. 410 (Main Street) (60-foot right-of-way), and also being along the eastern line of a 12-foot unnamed alley, and also being the southwest corner of the hereindescribed tract; THENCE North 43 degrees 42 minutes West along said alley a distance of ninety-nine and seventy-two one-hundredths (99.72) feet to an iron pipe set by this survey; THENCE North 48 degrees 9 minutes East along line of land of Muth, formerly Bloom, a distance of sixty-three and five one-hundredths (63.05) feet to an iron pipe set by this survey; THENCE North 43 degrees 42 minutes West along line of land of Muth, formerly Bloom, a distance of one hundred sixteen and twenty one-hundredths (116.20) feet to an iron pipe set by this survey; THENCE North 46 degrees 45 minutes East

along lands now or formerly of Sally J. Knarr, a distance of sixty-three and two one-hundredths (63.02) feet to an iron pipe set by this survey, said iron pipe being the northeast corner of the hereindescribed parcel; THENCE South 43 degrees 42 minutes East along lands now or formerly of Eugene J. and Marianne Fyda, a distance of two hundred seventeen and forty-four one-hundredths (217.44) feet to a drill hole set in concrete sidewalk, being the southeast corner of the hereindescribed parcel; THENCE South 48 degrees 8 minutes West along the northern right-of-way line of S.R. 410, a distance one hundred twenty-six and nine one-hundredths (126.09) feet to a one-inch pipe set by this survey, the point of beginning.

CONTAINING 19,936.6 square feet or 0.46 acre, in accordance with the survey prepared by Alexander & Associates, Inc., dated June 5, 1996, and recorded in the Clearfield County Recorder's Office in Map File No. 1219.

4. By deed dated February 3, 1947, and recorded in Clearfield County Deed Book 381, at Page 502, G. J. Cochran and Mary Cochran, husband and wife, conveyed a certain piece or parcel of land of which the "Premises" was a part to Andy Bloom and Charlotte Bloom, husband and wife.

5. On October 10, 1963, Charlotte Bloom initiated an action for divorce against Andrew Bloom a/k/a Andy Bloom in Clearfield County filed to No. 312 September 1963. The divorce action was finalized by Decree of Court entered April 22, 1964.

6. On February 21, 1966, Charlotte Bloom commenced a Complaint in Equity-Partition against Andy Bloom, a/k/a Andrew Bloom, her then ex-husband, requesting that a trustee be appointed to sell the parties' jointly-owned real estate

and distribute the proceeds equally. This action was in filed in Clearfield County at No. 1 February, 1966.

7. On March 18, 1966, the said Andy Bloom, a/k/a Andrew Bloom, through counsel filed an Answer but no further action appears of record with regard to the partition of the real estate of which the "Premises" was a part.

8. Plaintiff believes and therefore avers that the reason for no further action with regard to the partition action was that the said Charlotte Bloom and Andy Bloom a/k/a Andrew Bloom reached an amicable agreement whereby the said Andy Bloom a/k/a Andrew Bloom acquired any interest of the said Charlotte Bloom in the "Premises" but for some unknown reason, a deed evidencing this conveyance was never recorded.

9. The said Andy Bloom, a/k/a Andrew Bloom, died testate on June 14, 2002, naming the Plaintiff as his sole testate heir.

10. From at least 1966 until the transfer to Andy Bloom and the Plaintiff on March 26, 1998, the "Premises" had been assessed solely to Andy Bloom a/k/a Andrew Bloom.

11. Since 1966 until the transfer to Andy Bloom and the Plaintiff, the said Andy Bloom has treated the property as his own, residing on it and maintaining it, as well as paying all taxes.

12. The said Charlotte Bloom died intestate on December 12, 1968, being survived by three (3) daughters, Velma Karadeema, Edna Clarke and Verna Henricks.

13. The said Velma Karadeema's last known address is 5056 Route 76, Ripley, New York, 14775-9727.

14. The said Edna Clarke died November 8, 1984, being survived by her spouse, Champe Clarke, and the issue of her deceased daughter, Marie Konnerth, who had died April 2, 1967.

15. The said Champe Clarke died August 3, 1992, survived by Keith A. Konnerth, Sr., Robert A. Konnerth, Jr., David S. Konnerth and Kathy A. Hutter, the issue of his deceased daughter, Marie Konnerth, all of whom are named as Defendants herein.

16. The said Verna Henricks died August 28, 1986, survived by one (1) son, James Harold Henricks.

17. The said James Harold Henricks died April 4, 1996, survived by three (3) daughters, namely, Doris (Loar) Snyder, Karon Ann Newmeister and Joy Diane Beaudin, and the issue of Sandra Freeman, his deceased daughter, namely Cindy Lee Welsh, Tammy Welsh and Robert LeRoy Bean, all of whom are named as Defendants herein.

18. That from 1966, Plaintiff and his predecessor in title, Andrew Bloom, to the present, have exercised open, notorious and hostile possession and control over the "Premises" to the exclusion of all others.

19. That this Quiet Title Action is necessary to remove any cloud on Plaintiff's title to the "Premises" due to any irregularities in the chain of title because of unrecorded deeds and/or assignments and other documents, incomplete estate records of deceased persons showing a complete chain of title, and possible adverse interests of named Defendants, their heirs, successors and assigns.

20. That at no time have any of the herein named Defendants attempted to secure possession of the said "Premises", contest the title of Plaintiff or his predecessor in title or assist in the maintenance, repair or improvement of the "Premises" nor have they asserted any interest adverse to the Plaintiff by any legal action.

WHEREFORE, Plaintiff requests:

(a) That the Defendants be forever barred from asserting any right, title, lien or interest in the Plaintiff's land inconsistent with the ownership of the Plaintiff, unless the Defendants bring an action of ejectment against the Plaintiff for recovery of the land within thirty (30) days after the entry of judgment by the Court;

(b) That the Plaintiff be decreed as the sole owner and be entitled to exclusive possession of the premises described in the foregoing Complaint; and

(c) That the Court make such further orders as may be necessary to establish the legal and valid title of the Plaintiff and to grant him appropriate relief.

Respectfully submitted,

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

VERIFICATION

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

Leslie H. Smith
Leslie H. Smith

Dated: Jan 15, 2007

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
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TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
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or entities in interest, known or unknown,
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Defendants

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* NO. 07-120 -C.D.

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* Type of Case: QUIET TITLE ACTION

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* Type of Pleading: AFFIDAVIT OF
SERVICE

* Filed on behalf of: PLAINTIFF

* LESLIE H. SMITH

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* Counsel of record for Plaintiff:
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* BARBARA J. HUGNEY-SHOPE

* ATTORNEY AT LAW ESQUIRE

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* Supreme Court I. D. No. 26274

* 23 North Second Street

* Clearfield, PA 16830

* (814) 765-5155

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FILED
01/10/45
FEB 23 2007
Atty
Shope
W.A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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Defendants

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* NO. 07-120-C.D.

* * Type of Case: QUIET TITLE ACTION

CERTIFICATE OF SERVICE

AND NOW, this 15th day of February, 2007, I, BARBARA J. HUGNEY-SHOPE,
ESQUIRE, who, being duly sworn according to law, deposes and says that I served a certified
copy of the COMPLAINT, filed in the above-captioned matter, upon Robert Konnerth, Jr.,
by UNITED STATE POSTAL SERVICE CERTIFIED MAIL, FIRST CLASS DELIVERY,
on February 1, 2007, at the following address, to wit: 9315 Dorothy Drive, Streetsboro, OH
44241.

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

SWORN to and subscribed
before me this 15 day of
February, 2007

Michael J. Zaffo
Notary Public

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:

Robert Konnerth, Jr.
 9315 Dorothy Dr.
 Streetsboro OH
 44241

2. Article Number

(Transfer from service label)

7004 2510 0007 6101 9403

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)

2/1/07

C. Date of Delivery

D. Is delivery address different from item 1?

Yes
 If YES, enter delivery address below:

RECEIVED
 FEB 05 2007

3. Service Type Certified Mail Express Mail

Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

STREETSBORO OH 44241

OFFICIAL USE

✓ Postage	\$ 0.87	0830
✓ Certified Fee	\$ 2.40	
✓ Return Receipt Fee (Endorsement Required)	\$ 1.85	07
✓ Restricted Delivery Fee (Endorsement Required)	\$ 3.70	Postmark Here
Total Postage & Fees	\$ 8.82	01/29/2007

Sent To
 Robert Konnerth, Jr.
 Street, Apt. No. 9315 Dorothy Dr.
 or PO Box No.
 City, State ZIP 44241

PS Form 3800, June 2002

See Reverse for Instructions

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

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* NO. 07-120 -C.D.

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* Type of Case: QUIET TITLE ACTION

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* Type of Pleading: AFFIDAVIT OF
SERVICE

* Filed on behalf of: PLAINTIFF
LESLIE H. SMITH

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* Counsel of record for Plaintiff:

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* BARBARA J. HUGNEY-SHOPE
* ATTORNEY AT LAW ESQUIRE

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* Supreme Court I. D. No. 26274

* 23 North Second Street

* Clearfield, PA 16830

* (814) 765-5155

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FILED 1CC
01/10/2007 Atty. Shape
FEB 23 2007
W.A. Shaw
William A. Shaw
Prothonotary/Clerk of Courts

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

LESLIE H. SMITH, a single adult,
Plaintiff

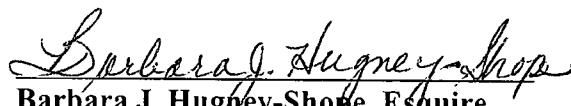
vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
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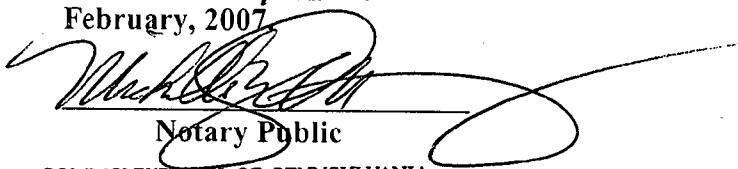
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CERTIFICATE OF SERVICE

AND NOW, this 15th day of February, 2007, I, BARBARA J. HUGNEY-SHOPE, ESQUIRE, who, being duly sworn according to law, deposes and says that I served a certified copy of the COMPLAINT, filed in the above-captioned matter, upon Velma Karadeema, by UNITED STATE POSTAL SERVICE CERTIFIED MAIL, FIRST CLASS DELIVERY, on February 9, 2007, at the following address, to wit: 560 Fairmont Avenue, Jamestown, New York 14701.


Barbara J. Hugney-Shope
Attorney for Plaintiff

SWORN to and subscribed
before me this 15 day of
February, 2007


Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Michelle O'Day-Manning, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires May 3, 2009

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:

Velma Karadeema
560 Fairmont Ave.
Jamestown NY
14701-2479

2. Article Number

(Transfer from service label)

7003 1680 0005 6732 6196

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Jody Spetz

Agent
 Addressee

B. Received by (Printed Name)

Jody Spetz

C. Date of Delivery

2/9

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

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

JAMESTOWN NY 14701

OFFICIAL USE

✓ Postage	\$ 0.87
✓ Certified Fee	\$ 2.40
✓ Return Receipt Fee (Endorsement Required)	\$ 1.85
✓ Restricted Delivery Fee (Endorsement Required)	\$ 0.00
Total Postage & Fees	\$ 5.12

0830

07

Postmark
Here

02/06/2007

Sent To	Velma Karadeema
Street, Apt. No. or PO Box No.	560 Fairmont Ave
City, State, ZIP+4	Jamestown NY 14701-2479

PS Form 3800, June 2002

See Reverse for Instructions

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* NO. 07- /20 -C.D.

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* Type of Case: QUIET TITLE ACTION

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* Type of Pleading: AFFIDAVIT OF
* SERVICE

* Filed on behalf of: PLAINTIFF

* LESLIE H. SMITH

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* Counsel of record for Plaintiff:

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* BARBARA J. HUGNEY-SHOPE

* ATTORNEY AT LAW ESQUIRE

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FILED
01/10/45/2014 Atty Shope
FEB 23 2007

William A. Shaw
Prothonotary/Clerk of Courts

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CERTIFICATE OF SERVICE

AND NOW, this 15th day of February, 2007, I, BARBARA J. HUGNEY-SHOPE,
ESQUIRE, who, being duly sworn according to law, deposes and says that I served a certified
copy of the COMPLAINT, filed in the above-captioned matter, upon Kathy Hutter, by
UNITED STATE POSTAL SERVICE CERTIFIED MAIL, FIRST CLASS DELIVERY, on
February 1, 2007, at the following address, to wit: 2376 Sunset Crossing Road, Diamond
Bar, California 91765.

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

SWORN to and subscribed
before me this 15 day of
February, 2007.

Michelle O'Day-Manning
Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Michelle O'Day-Manning, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires May 3, 2009

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(Domestic Mail Only; No Insurance Coverage Provided)

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DIAMOND BAR CA 91765

OFFICIAL USE

✓ Postage	\$ 0.87	0830
✓ Certified Fee	\$ 2.40	07
✓ Return Receipt Fee (Endorsement Required)	\$ 1.85	Postmark Here
✓ Restricted Delivery Fee (Endorsement Required)	\$ 3.70	
Total Postage & Fees	\$ 8.82	01/29/2007

Sent To
Kathy Hutter
 Street, Apt. No.,
 or PO Box No. **23768**
 City, State ZIP+4 **Diamond Bar CA 91765**

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:

Kathy Hutter
23768 Sunset Crossing Rd
Diamond Bar CA
91765

2. Article Number

(Transfer from service label)

7004 2510 0007 6101 9427

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Kathy Hutter

Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

RECEIVED

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below

FEB 01 2007 FEB 05 2007

3. Service Type

<input 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.

4. Restricted Delivery? (Extra Fee)

Yes

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

LESLIE H. SMITH, a single adult,
Plaintiff

*

*

*

*

*

*

NO. 07-120-C.D.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

* Type of Case: QUIET TITLE ACTION

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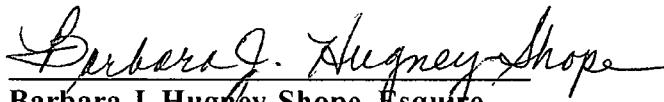
*

Defendants

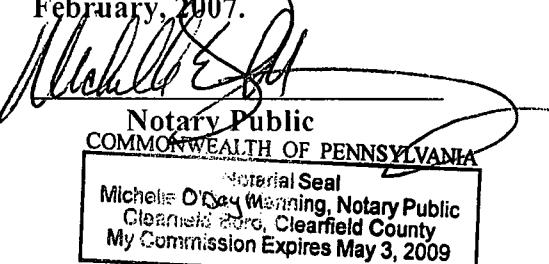
*

CERTIFICATE OF SERVICE

AND NOW, this 21st day of February, 2007, I, BARBARA J. HUGNEY-SHOPE, ESQUIRE, who, being duly sworn according to law, deposes and says that I served a certified copy of the COMPLAINT, filed in the above-captioned matter, upon DAVID KONNERTH, by UNITED STATE POSTAL SERVICE CERTIFIED MAIL, FIRST CLASS DELIVERY, on February 16, 2007, at the following address, to wit: 6950 46th Ave. N #20, St. Petersburg, Florida 33713.


Barbara J. Hugney-Shope
Attorney for Plaintiff

SWORN to and subscribed
before me this 21st day of
February, 2007.



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<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>A. Signature <i>D. S. Konnerth</i></p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery 2/16/07</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center;">RECEIVE</p>	
<p>1. Article Addressed to:</p> <p><i>David Konnerth 6950 46th Ave. N# 20 St. Petersburg FL 33713</i></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>	
<p>2. Article Number (Transfer from service label)</p> <p><i>7006 0100 0003 4233 2700</i></p>			

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											
<i>7006 0100 0003 4233 2700</i>	<table border="1" style="width: 100px; border-collapse: collapse;"> <tr> <td style="text-align: center; padding: 2px;">Postage</td> <td style="text-align: right; padding: 2px;">\$ 2.40</td> </tr> <tr> <td style="text-align: center; padding: 2px;">Certified Fee</td> <td style="text-align: right; padding: 2px;">\$ 1.85</td> </tr> <tr> <td style="text-align: center; padding: 2px;">Return Receipt Fee (Endorsement Required)</td> <td style="text-align: right; padding: 2px;">\$ 0.00</td> </tr> <tr> <td style="text-align: center; padding: 2px;">Restricted Delivery Fee (Endorsement Required)</td> <td style="text-align: right; padding: 2px;">\$ 0.00</td> </tr> <tr> <td style="text-align: center; padding: 2px;">Total Postage & Fees</td> <td style="text-align: right; padding: 2px;">\$ 5.12</td> </tr> </table>	Postage	\$ 2.40	Certified Fee	\$ 1.85	Return Receipt Fee (Endorsement Required)	\$ 0.00	Restricted Delivery Fee (Endorsement Required)	\$ 0.00	Total Postage & Fees	\$ 5.12
Postage	\$ 2.40										
Certified Fee	\$ 1.85										
Return Receipt Fee (Endorsement Required)	\$ 0.00										
Restricted Delivery Fee (Endorsement Required)	\$ 0.00										
Total Postage & Fees	\$ 5.12										
											
<p>Sent To <i>David Konnerth</i></p> <p>Street, Apt. No.: <i>6950 46th Ave. N# 20</i></p> <p>or PO Box No.</p> <p>City, State, ZIP+4 <i>St. Petersburg FL 33713</i></p>											
<p>PS Form 3800, June 2002</p> <p>See Reverse for Instructions</p>											

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102383
NO: 07-120-CD
SERVICE # 1 OF 5
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH, a single adult
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, January 29, 2007, SHERIFF OF LANCASTER COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ROBERT LEROY BEAN.

NOW, February 21, 2007 AT 7:35 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ROBERT LEROY BEAN, DEFENDANT. THE RETURN OF LANCASTER COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

FILED

03/01/07
MAY 01 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102383
NO: 07-120-CD
SERVICE # 2 OF 5
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH, a single adult
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, January 29, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON CINDY LEE WELSH.

NOW, February 05, 2007 AT 1:00 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON CINDY LEE WELSH, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102383
NO: 07-120-CD
SERVICE # 3 OF 5
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH, a single adult
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, January 29, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON TAMMY
WELSH.

NOW, May 01, 2007 ATTEMPTED TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON TAMMY
WELSH, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS
RETURN MARKED "NOT FOUND".

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102383
NO: 07-120-CD
SERVICE # 4 OF 5
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH, a single adult
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, January 29, 2007, SHERIFF OF CLARION COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON JOY DIANE BEAUDIN.

NOW, May 01, 2007 ATTEMPTED TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON JOY DIANE BEAUDIN, DEFENDANT. THE RETURN OF CLARION COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102383
NO: 07-120-CD
SERVICE # 5 OF 5
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH, a single adult
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, January 29, 2007, SHERIFF OF CLARION COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON DORIS (LOAR) SNYDER.

NOW, May 01, 2007 ATTEMPTED TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON DORIS (LOAR) SNYDER, DEFENDANT. THE RETURN OF CLARION COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102383
NO: 07-120-CD
SERVICES 5
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH, a single adult
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	HUGNEY-SHOPE	6577	50.00
SHERIFF HAWKINS	HUGNEY-SHOPE	6577	41.39
CLARION CO.	HUGNEY-SHOPE	6578	71.00
JEFFERSON CO.	HUGNEY-SHOPE	6579	48.31
LANCASTER CO.	HUGNEY-SHOPE	6589	55.11

Sworn to Before Me This

____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

SHERIFF'S OFFICE

50 NORTH DUKE STREET, P.O. BOX 83480, LANCASTER, PENNSYLVANIA 17608-3480 • (717) 299-8200

MISC
BEAN

102383

SHERIFF SERVICE

PROCESS RECEIPT, and AFFIDAVIT OF RETURN

**PLEASE TYPE OR PRINT LEGIBLY.
DO NOT DETACH ANY COPIES.**

1. PLAINTIFF/S/

LESLIE H. SMITH

2 COURT NUMBER

07-120-CD

3. DEFENDANT/S/

VELMA KARADEEMA et al

4 TYPE OF WRIT OR COMPLAINT

COMPLAINT ACTION TO QUIET TITLE

SERVE

5. NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO BE SERVED.

→
AT

ROBERT LEROY BEAN

6. ADDRESS (Street or RFD, Apartment No., City, Boro, Twp., State and ZIP Code)
205 Shenks Ferry Road, Conestoga, Pa. 17516

7. INDICATE UNUSUAL SERVICE: DEPUTIZE OTHER

CLEARFIELD

Now, Jan. 29 2007, I, SHERIFF OF ~~LANCASTER~~ COUNTY, PA., do hereby depose the Sheriff of ~~LANCASTER~~ County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff.

SHERIFF OF LANCASTER COUNTY

8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE:

CLEARFIELD CO.

NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN — Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

9. SIGNATURE of ATTORNEY or other ORIGINATOR

Barbara J. Hugney-Shope ESO.

10. TELEPHONE NUMBER

814-765-5155

11. DATE

1/25/07

12. SEND NOTICE OF SERVICE COPY TO NAME AND ADDRESS BELOW: (This area must be completed if notice is to be mailed)

23 N SECOND ST.

CLEARFIELD PA. 16830

SPACE BELOW FOR USE OF SHERIFF ONLY — DO NOT WRITE BELOW THIS LINE

13. I acknowledge receipt of the writ or complaint as indicated above.	NAME of Authorized LCSO Deputy or Clerk	14. Date Received	15. Expiration/Hearing date
	JACKIE MICCICHE 717-390-2309	2/1/07	2/26/07

16. I hereby **CERTIFY** and **RETURN** that I have personally served, have legal evidence of service as shown in "Remarks", have executed as shown in "Remarks", the writ or complaint described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., at the address inserted below by handing a **TRUE** and **ATTESTED COPY** thereof.

17. I hereby certify and return a **NOT FOUND** because I am unable to locate the individual, company, corporation, etc., named above. (See remarks below)

18. Name and title of individual served (if not shown above) (Relationship to Defendant)	19. <input type="checkbox"/> No Service See Remarks Below (No. 30)
--	---

20. Address of where served (complete only if different than shown above) (Street or RFD, Apartment No., City, Boro, Twp. State and Zip Code)	21. Date of Service	22. Time
1069 Williamsburg Rd. Lanc. PA 17603	2/21/07	7:35

23. ATTEMPTS	Date	Miles	Dep. Int.									
	2/6	16	HG	2/21	5	MAH	2/21	5	BAG	2/21		

24. Advance Costs	25. Service Costs	26. Notary Cert.	27. Mileage/Postage/N.F.	28. Total Costs	29. COST DUE OR REFUND
R 150596	100.00	42.50		12.61	55.11

30. REMARKS:

2/21/07 12:00 PM
SHERIFF'S DEBT

S.T.A.:

SOJLEEB-1 bk 8:22

1. I affirm and subscribed to before me this	20	30. SO ANSWER.
		BETH A. GOMBER
31. I am a Notary Public		32. Signature of Dep Sheriff
32. My Commission Expires		Beth A. Gomber
33. Date		34. Date
		2/21/07
34. Date		35. Signature of Sheriff
		Beth A. Gomber
35. Date		36. Date
		2/23/07

2001 FEB 1 PM 8:55

RECEIVED

SHERIFF'S DEPT
LANC. CO. PA.

22-11 4423

78



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 102383

LESLIE H. SMITH, a single adult

TERM & NO. 07-120-CD

VS.

VELMA KARADEEMA et al

COMPLAINT ACTION TO QUIET TITLE

SERVE BY: 02/24/07

HEARING:

MAKE REFUND PAYABLE TO BARBARA J. HUGNEY-SHOPE, ESQ.

SERVE: ROBERT LEROY BEAN

ADDRESS: 205 SHENKS FERRY ROAD, CONESTOGA, PA 17516

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 LANCASTER COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, January 29, 2007.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

No. 07-120 C.D.

Personally appeared before me, Bill Dombrowski, Deputy for Thomas A. Demko, Sheriff of Jefferson County, Pennsylvania, who according to law deposes and says that on February 5, 2007 at 1:00 o'clock P.M. served the Complaint Action To Quiet Title upon CINDY LEE WELSH, Defendant, at the address of 437 7th Avenue Ext., Brockway, Township of Snyder, County of Jefferson, State of Pennsylvania, by handing to the defendant personally, a true copy of the Complaint and by making known to her the contents thereof.

Now, February 7, 2007 I return the Complaint Action To Quiet Title for TAMMY WELSH, Defendant, to the Clearfield County Sheriff's Office marked "not found; defendant has never lived at this address and we could not find a better address for her".

Advance Costs Received:	\$125.00	
My Costs:	46.31	Paid
Prothy:	2.00	
Total Costs:	48.31	
REFUNDED:	\$ 76.69	

Sworn and subscribed
to before me this 7th
day of Feb. 2007
By Thomas A. Demko

So Answers,

Bill Dombrowski Deputy

My Commission Expires the
1st Monday, January 2010

Thomas A. Demko
Jefferson County Sheriff
JEFFERSON COUNTY, PENNSYLVANIA

NOT FOUND AFFIDAVIT

IN THE COURT OF COMMON PLEAS
OF CLARION COUNTY

LESLIE H SMITH

VERSUS

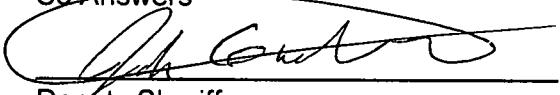
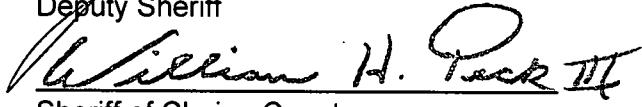
JOY DIANE BEAUDIN

NUM: 07 120-CD

COMMONWEALTH of PENNSYLVANIA
COUNTY OF CLARION

Before me, the undersigned authority, personally appeared DEPUTY JOSH GUNTRUM , who being duly sworn according to law, deposes and says that on the 2ND day of FEBRUARY , 2,007 at 3:01PM made a diligent search and inquiry for JOY DIANE BEAUDIN at RD 1 BOX 14, MAYPORT PA 16240, NO LONGER A VALID ADDRESS PER POST OFFICE (PER J-NET ADDRESS IS ACTUALLY 325 S MCKEAN ST., APT. 211 BUTLER PA 16001) , Clarion County, Pennsylvania, and elsewhere, and was unable to locate the said JOY DIANE BEAUDIN anywhere within the said address given in the County of Clarion, Pennsylvania.

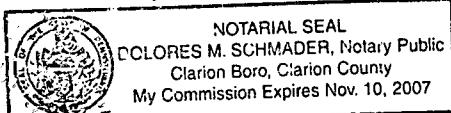
So Answers


John Gasko
Deputy Sheriff

William H. Pack III
Sheriff of Clarion County

Sworn to and subscribed before me this

7th day of February A.D. 20 07

Dolores M. Schmader
Notary Public



NOT FOUND AFFIDAVIT

IN THE COURT OF COMMON PLEAS
OF CLARION COUNTY

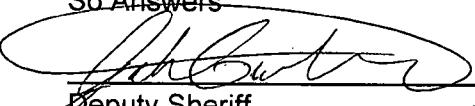
LESLIE H SMITH
VERSUS
DORIS (LOAR) SNYDER

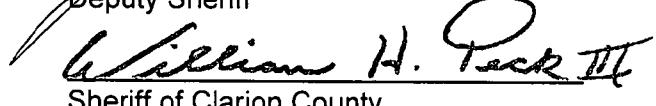
NUM: 07 120-CD

COMMONWEALTH of PENNSYLVANIA
COUNTY OF CLARION

Before me, the undersigned authority, personally appeared
DEPUTY JOSH GUNTRUM , who being duly sworn according to law,
deposes and says that on the 2ND day of FEBRUARY , 2,007
at 3:02PM made a diligent search and inquiry for DORIS (LOAR) SNYDER
at RD 2 BOX 92, MAYPORT PA 16240. (PER POST OFFICE, CURRENT ADDRESS OF 29 MARTZ
FARM ROAD, MAYPORT PA 16240 IS LOCATED IN JEFFERSON COUNTY). , Clarion County,
Pennsylvania, and
elsewhere, and was unable to locate the said DORIS (LOAR) SNYDER
anywhere within the said address given in the County of
Clarion, Pennsylvania.

So Answers


John G. Guntrum
Deputy Sheriff

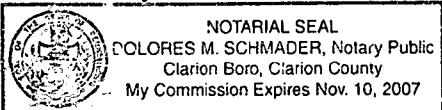

William H. Pack III
Sheriff of Clarion County

Sworn to and subscribed before me this

8th day of February A.D. 20 07

Dolores M. Schmader

Notary Public





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 102383

LESLIE H. SMITH, a single adult

VS.

VELMA KARADEEMA et al

TERM & NO. 07-120-CD

COMPLAINT ACTION TO QUIET TITLE

SERVE BY: 02/24/07

HEARING:

MAKE REFUND PAYABLE TO BARBARA J. HUGNEY-SHOPE, ESQ.

SERVE: JOY DIANE BEAUDIN

ADDRESS: RR#1 BOX 14, MAYPORT, PA 16240

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 CLARION COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, January 29, 2007.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

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
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SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 102383

TERM & NO. 07-120-CD

LESLIE H. SMITH, a single adult

COMPLAINT ACTION TO QUIET TITLE

VS.

VELMA KARADEEMA et al

SERVE BY: 02/24/07

HEARING:

MAKE REFUND PAYABLE TO BARBARA J. HUGNEY-SHOPE, ESQ.

SERVE: DORIS (LOAR) SNYDER

ADDRESS: RD#2 BOX 92, MAYPORT, PA 16240

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 CLARION COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, January 29, 2007.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

Barbara J. Hugney-Shope
ATTORNEY AT LAW

23 North Second Street
Clearfield, PA 16830

814-765-5155
FAX 814-765-2957

January 25, 2007

Tammy Welsh
920 King Road
Brookville, PA 15825

RE: **QUIET TITLE ACTION**
Leslie Smith vs. Velma Karadeema, et al.

Dear Mrs. Welsh:

Enclosed herewith is a certified copy of a Quiet Title Action that I have filed on behalf of Leslie H. Smith, the present owner of the property formerly owned by Andrew Bloom also known as Andy Bloom. Mr. Bloom passed away in 2002 and we are attempting to clear the title to his property in order to settle his estate.

It is necessary that we serve you with notice of the Quiet Title Action as an heir of the late Charlotte Bloom. If you have any questions on the enclosed, you are advised to take it to your attorney and have him or her review it with you. You have twenty (20) days from the date of receipt of this Complaint to file an Answer to the Quiet Title Action Complaint. If you do not do so, any rights you that you might have had will be extinguished once a final Order is entered by the Court.

Obviously, there is no necessity for you to do anything if you do intend to pursue any claim.

Very truly yours,

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope

BJHS/mom

Enclosure

cc: Mr. Leslie Smith

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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* NO. 07-120 -C.D.

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* Type of Case: QUIET TITLE ACTION

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* Type of Pleading: COMPLAINT

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* Filed on behalf of: PLAINTIFF

* LESLIE H. SMITH

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* Counsel of record for Plaintiff:

*

* BARBARA J. HUGNEY-SHOPE

* ATTORNEY AT LAW ESQUIRE

*

* Supreme Court I. D. No. 26274

* 23 North Second Street

* Clearfield, PA 16830

* (814) 765-5155

*

*

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

JAN 25 2007

Attest.



William L. Hause
Prothonotary/
Clerk of Courts

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR) * NO. 07- -C.D.
SNYDER; JOY DIANE BEAUDIN; KARON *
ANN NEWMEISTER; CINDY LEE WELSH; * QUIET TITLE ACTION
TAMMY WELSH; ROBERT LeROY BEAN; *
KEITH A. KONNERTH, SR.; ROBERT A. *
KONNERTH, JR.; DAVID S. KONNERTH; *
and KATHY A. HUTTER, as Sole Surviving *
Intestate Heirs of CHARLOTTE BLOOM, *
Deceased, their heirs, executors, administrators, *
successors and assigns, and all other persons *
or entities in interest, known or unknown, *
claiming by and through or under them, *
Defendants *

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against these 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.

Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

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

COMPLAINT

AND NOW COMES, the Plaintiff, LESLIE H. SMITH, who by and through his attorney, BARBARA J. HUGNEY-SHOPE, ESQUIRE, files this complaint to quiet the title to certain real estate and in support thereof avers as follows:

1. That the Plaintiff, LESLIE H. SMITH, is an adult individual, who resides at 385 LeContes Mills Road, Frenchville, Pennsylvania 16836.

2. That the Defendants are the sole surviving intestate heirs at law of Charlotte Bloom, who died intestate December 12, 1968:

- (a) Velma Karadeema whose last known address was 5956 Route 76, Ripley, New York 14775-9727; however, she is believed to be deceased and her heirs are unknown;
- (b) Doris (Loar) Snyder whose last known address was R.D. #2, Box 92 Mayport, PA 16240;
- (c) Joy Diane Beaudin whose last known address was R.R. #1, Box 14 Mayport, PA 16240;
- (d) Karon Ann Newmeister whose last known address was P.O. Box 6581, Big Bear Lake, CA 92315;
- (e) Cindy Lee Welsh whose last known address was 437 7th Avenue Extension, Brockway, PA 15824;
- (f) Tammy Welsh whose last known address was 920 King Road, Brookville, PA 15825;
- (g) Robert LeRoy Bean whose last known address was 205 Shenks Ferry Road, Conastoga, PA 17516;
- (h) Keith A. Konnerth, Sr., whose last known address was 1403 W. 18th Street, Lorain, Ohio 44052;

(i) Robert A. Konnerth, Jr., whose last known address was 9315 Dorothy Drive, Streetsboro, Ohio 44241;

(j) David S. Konnerth whose last known address was P.O. Box 667, St. Petersburg, FL 33713; and

(k) Kathy A. Hutter whose last known address was 23768 Sunset Crossing Road, Diamond Bar, CA 91765.

3. That the Plaintiff is currently the owner of a certain piece or parcel of land situate in the Borough of Troutville, Clearfield County, Pennsylvania, hereinafter referred to as the "Premises" conveyed to him as joint tenant with right of survivorship with Andy Bloom by deed of Andy Bloom dated March 26, 1998, and recorded in Clearfield County Deeds and Records Book 1929, page 519 bounded and described as follows:

ALL that parcel or tract of land lying and being situate in the Borough of Troutville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a one-inch iron pipe set by this survey, said iron pipe being along the northern right-of-way line for S.R. 410 (Main Street) (60-foot right-of-way), and also being along the eastern line of a 12-foot unnamed alley, and also being the southwest corner of the herein-described tract; THENCE North 43 degrees 42 minutes West along said alley a distance of ninety-nine and seventy-two one-hundredths (99.72) feet to an iron pipe set by this survey; THENCE North 48 degrees 9 minutes East along line of land of Muth, formerly Bloom, a distance of sixty-three and five one-hundredths (63.05) feet to an iron pipe set by this survey; THENCE North 43 degrees 42 minutes West along line of land of Muth, formerly Bloom, a distance of one hundred sixteen and twenty one-hundredths (116.20) feet to an iron pipe set by this survey; THENCE North 46 degrees 45 minutes East

along lands now or formerly of Sally J. Knarr, a distance of sixty-three and two one-hundredths (63.02) feet to an iron pipe set by this survey, said iron pipe being the northeast corner of the hereindescribed parcel; THENCE South 43 degrees 42 minutes East along lands now or formerly of Eugene J. and Marianne Fyda, a distance of two hundred seventeen and forty-four one-hundredths (217.44) feet to a drill hole set in concrete sidewalk, being the southeast corner of the hereindescribed parcel; THENCE South 48 degrees 8 minutes West along the northern right-of-way line of S.R. 410, a distance one hundred twenty-six and nine one-hundredths (126.09) feet to a one-inch pipe set by this survey, the point of beginning.

CONTAINING 19,936.6 square feet or 0.46 acre, in accordance with the survey prepared by Alexander & Associates, Inc., dated June 5, 1996, and recorded in the Clearfield County Recorder's Office in Map File No. 1219.

4. By deed dated February 3, 1947, and recorded in Clearfield County Deed Book 381, at Page 502, G. J. Cochran and Mary Cochran, husband and wife, conveyed a certain piece or parcel of land of which the "Premises" was a part to Andy Bloom and Charlotte Bloom, husband and wife.

5. On October 10, 1963, Charlotte Bloom initiated an action for divorce against Andrew Bloom a/k/a Andy Bloom in Clearfield County filed to No. 312 September 1963. The divorce action was finalized by Decree of Court entered April 22, 1964.

6. On February 21, 1966, Charlotte Bloom commenced a Complaint in Equity-Partition against Andy Bloom, a/k/a Andrew Bloom, her then ex-husband, requesting that a trustee be appointed to sell the parties' jointly-owned real estate

and distribute the proceeds equally. This action was in filed in Clearfield County at No. 1 February, 1966.

7. On March 18, 1966, the said Andy Bloom, a/k/a Andrew Bloom, through counsel filed an Answer but no further action appears of record with regard to the partition of the real estate of which the "Premises" was a part.

8. Plaintiff believes and therefore avers that the reason for no further action with regard to the partition action was that the said Charlotte Bloom and Andy Bloom a/k/a Andrew Bloom reached an amicable agreement whereby the said Andy Bloom a/k/a Andrew Bloom acquired any interest of the said Charlotte Bloom in the "Premises" but for some unknown reason, a deed evidencing this conveyance was never recorded.

9. The said Andy Bloom, a/k/a Andrew Bloom, died testate on June 14, 2002, naming the Plaintiff as his sole testate heir.

10. From at least 1966 until the transfer to Andy Bloom and the Plaintiff on March 26, 1998, the "Premises" had been assessed solely to Andy Bloom a/k/a Andrew Bloom.

11. Since 1966 until the transfer to Andy Bloom and the Plaintiff, the said Andy Bloom has treated the property as his own, residing on it and maintaining it, as well as paying all taxes.

12. The said Charlotte Bloom died intestate on December 12, 1968, being survived by three (3) daughters, Velma Karadeema, Edna Clarke and Verna Henricks.

13. The said Velma Karadeema's last known address is 5056 Route 76, Ripley, New York, 14775-9727.

14. The said Edna Clarke died November 8, 1984, being survived by her spouse, Champe Clarke, and the issue of her deceased daughter, Marie Konnerth, who had died April 2, 1967.

15. The said Champe Clarke died August 3, 1992, survived by Keith A. Konnerth, Sr., Robert A. Konnerth, Jr., David S. Konnerth and Kathy A. Hutter, the issue of his deceased daughter, Marie Konnerth, all of whom are named as Defendants herein.

16. The said Verna Henricks died August 28, 1986, survived by one (1) son, James Harold Henricks.

17. The said James Harold Henricks died April 4, 1996, survived by three (3) daughters, namely, Doris (Loar) Snyder, Karon Ann Newmeister and Joy Diane Beaudin, and the issue of Sandra Freeman, his deceased daughter, namely Cindy Lee Welsh, Tammy Welsh and Robert LeRoy Bean, all of whom are named as Defendants herein.

18. That from 1966, Plaintiff and his predecessor in title, Andrew Bloom, to the present, have exercised open, notorious and hostile possession and control over the "Premises" to the exclusion of all others.

19. That this Quiet Title Action is necessary to remove any cloud on Plaintiff's title to the "Premises" due to any irregularities in the chain of title because of unrecorded deeds and/or assignments and other documents, incomplete estate records of deceased persons showing a complete chain of title, and possible adverse interests of named Defendants, their heirs, successors and assigns.

20. That at no time have any of the herein named Defendants attempted to secure possession of the said "Premises", contest the title of Plaintiff or his predecessor in title or assist in the maintenance, repair or improvement of the "Premises" nor have they asserted any interest adverse to the Plaintiff by any legal action.

WHEREFORE, Plaintiff requests:

(a) That the Defendants be forever barred from asserting any right, title, lien or interest in the Plaintiff's land inconsistent with the ownership of the Plaintiff, unless the Defendants bring an action of ejectment against the Plaintiff for recovery of the land within thirty (30) days after the entry of judgment by the Court;

(b) That the Plaintiff be decreed as the sole owner and be entitled to exclusive possession of the premises described in the foregoing Complaint; and

(c) That the Court make such further orders as may be necessary to establish the legal and valid title of the Plaintiff and to grant him appropriate relief.

Respectfully submitted,

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

VERIFICATION

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

Leslie H. Smith
Leslie H. Smith

Dated: Jan 15, 2007

Barbara J. Hugney-Shope
ATTORNEY AT LAW

23 North Second Street
Clearfield, PA 16830

814-765-5155
FAX 814-765-2957

January 25, 2007

Joy Diane Beaudin
R. R. #1, Box 14
Mayport, PA 16240

RE: QUIET TITLE ACTION
Leslie Smith vs. Velma Karadeema, et al.

Dear Mrs. Beaudin:

Enclosed herewith is a certified copy of a Quiet Title Action that I have filed on behalf of Leslie H. Smith, the present owner of the property formerly owned by Andrew Bloom also known as Andy Bloom. Mr. Bloom passed away in 2002 and we are attempting to clear the title to his property in order to settle his estate.

It is necessary that we serve you with notice of the Quiet Title Action as an heir of the late Charlotte Bloom. If you have any questions on the enclosed, you are advised to take it to your attorney and have him or her review it with you. You have twenty (20) days from the date of receipt of this Complaint to file an Answer to the Quiet Title Action Complaint. If you do not do so, any rights you that you might have had will be extinguished once a final Order is entered by the Court.

Obviously, there is no necessity for you to do anything if you do intend to pursue any claim.

Very truly yours,


Barbara J. Hugney-Shope

BJHS/mom

Enclosure

cc: Mr. Leslie Smith

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

LESLIE H. SMITH, a single adult,
Plaintiff

* * *

VS.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them.

* NO. 07- -C.D.
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* QUIET TITLE ACTION
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NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against these 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.

Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982

Barbara J. Hugney-Shop
Barbara J. Hugney-Shop, Esquire
Attorney for Plaintiff

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

LESLIE H. SMITH, a single adult,
Plaintiff

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vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

*

NO. 07- -C.D.

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QUIET TITLE ACTION

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Defendants

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COMPLAINT

AND NOW COMES, the Plaintiff, LESLIE H. SMITH, who by and through his attorney, BARBARA J. HUGNEY-SHOPE, ESQUIRE, files this complaint to quiet the title to certain real estate and in support thereof avers as follows:

1. That the Plaintiff, LESLIE H. SMITH, is an adult individual, who resides at 385 LeContes Mills Road, Frenchville, Pennsylvania 16836.

2. That the Defendants are the sole surviving intestate heirs at law of Charlotte Bloom, who died intestate December 12, 1968:

- (a) Velma Karadeema whose last known address was 5956 Route 76, Ripley, New York 14775-9727; however, she is believed to be deceased and her heirs are unknown;
- (b) Doris (Loar) Snyder whose last known address was R.D. #2, Box 92 Mayport, PA 16240;
- (c) Joy Diane Beaudin whose last known address was R.R. #1, Box 14 Mayport, PA 16240;
- (d) Karon Ann Newmeister whose last known address was P.O. Box 6581, Big Bear Lake, CA 92315;
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3. That the Plaintiff is currently the owner of a certain piece or parcel of land situate in the Borough of Troutville, Clearfield County, Pennsylvania, hereinafter referred to as the "Premises" conveyed to him as joint tenant with right of survivorship with Andy Bloom by deed of Andy Bloom dated March 26, 1998, and recorded in Clearfield County Deeds and Records Book 1929, page 519 bounded and described as follows:

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4. By deed dated February 3, 1947, and recorded in Clearfield County Deed Book 381, at Page 502, G. J. Cochran and Mary Cochran, husband and wife, conveyed a certain piece or parcel of land of which the "Premises" was a part to Andy Bloom and Charlotte Bloom, husband and wife.

5. On October 10, 1963, Charlotte Bloom initiated an action for divorce against Andrew Bloom a/k/a Andy Bloom in Clearfield County filed to No. 312 September 1963. The divorce action was finalized by Decree of Court entered April 22, 1964.

6. On February 21, 1966, Charlotte Bloom commenced a Complaint in Equity-Partition against Andy Bloom, a/k/a Andrew Bloom, her then ex-husband, requesting that a trustee be appointed to sell the parties' jointly-owned real estate

and distribute the proceeds equally. This action was in filed in Clearfield County at No. 1 February, 1966.

7. On March 18, 1966, the said Andy Bloom, a/k/a Andrew Bloom, through counsel filed an Answer but no further action appears of record with regard to the partition of the real estate of which the "Premises" was a part.

8. Plaintiff believes and therefore avers that the reason for no further action with regard to the partition action was that the said Charlotte Bloom and Andy Bloom a/k/a Andrew Bloom reached an amicable agreement whereby the said Andy Bloom a/k/a Andrew Bloom acquired any interest of the said Charlotte Bloom in the "Premises" but for some unknown reason, a deed evidencing this conveyance was never recorded.

9. The said Andy Bloom, a/k/a Andrew Bloom, died testate on June 14, 2002, naming the Plaintiff as his sole testate heir.

10. From at least 1966 until the transfer to Andy Bloom and the Plaintiff on March 26, 1998, the "Premises" had been assessed solely to Andy Bloom a/k/a Andrew Bloom.

11. Since 1966 until the transfer to Andy Bloom and the Plaintiff, the said Andy Bloom has treated the property as his own, residing on it and maintaining it, as well as paying all taxes.

12. The said Charlotte Bloom died intestate on December 12, 1968, being survived by three (3) daughters, Velma Karadeema, Edna Clarke and Verna Henricks.

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14. The said Edna Clarke died November 8, 1984, being survived by her spouse, Champe Clarke, and the issue of her deceased daughter, Marie Konnerth, who had died April 2, 1967.

15. The said Champe Clarke died August 3, 1992, survived by Keith A. Konnerth, Sr., Robert A. Konnerth, Jr., David S. Konnerth and Kathy A. Hutter, the issue of his deceased daughter, Marie Konnerth, all of whom are named as Defendants herein.

16. The said Verna Henricks died August 28, 1986, survived by one (1) son, James Harold Henricks.

17. The said James Harold Henricks died April 4, 1996, survived by three (3) daughters, namely, Doris (Loar) Snyder, Karon Ann Newmeister and Joy Diane Beaudin, and the issue of Sandra Freeman, his deceased daughter, namely Cindy Lee Welsh, Tammy Welsh and Robert LeRoy Bean, all of whom are named as Defendants herein.

18. That from 1966, Plaintiff and his predecessor in title, Andrew Bloom, to the present, have exercised open, notorious and hostile possession and control over the "Premises" to the exclusion of all others.

19. That this Quiet Title Action is necessary to remove any cloud on Plaintiff's title to the "Premises" due to any irregularities in the chain of title because of unrecorded deeds and/or assignments and other documents, incomplete estate records of deceased persons showing a complete chain of title, and possible adverse interests of named Defendants, their heirs, successors and assigns.

20. That at no time have any of the herein named Defendants attempted to secure possession of the said "Premises", contest the title of Plaintiff or his predecessor in title or assist in the maintenance, repair or improvement of the "Premises" nor have they asserted any interest adverse to the Plaintiff by any legal action.

WHEREFORE, Plaintiff requests:

(a) That the Defendants be forever barred from asserting any right, title, lien or interest in the Plaintiff's land inconsistent with the ownership of the Plaintiff, unless the Defendants bring an action of ejectment against the Plaintiff for recovery of the land within thirty (30) days after the entry of judgment by the Court;

(b) That the Plaintiff be decreed as the sole owner and be entitled to exclusive possession of the premises described in the foregoing Complaint; and

(c) That the Court make such further orders as may be necessary to establish the legal and valid title of the Plaintiff and to grant him appropriate relief.

Respectfully submitted,

Barbara J. Hugney-Shope
Bárbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

VERIFICATION

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

Leslie H. Smith
Leslie H. Smith

Dated: Jan 15, 2007

Barbara J. Hugney-Shope
ATTORNEY AT LAW

**23 North Second Street
Clearfield, PA 16830**

**814-765-5155
FAX 814-765-2957**

January 25, 2007

Doris (Loar) Snyder
R. D. #2, Box 92
Mayport, PA 16240

**RE: QUIET TITLE ACTION
Leslie Smith vs. Velma Karadeema, et al.**

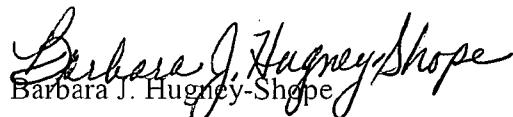
Dear Mrs. Snyder:

Enclosed herewith is a certified copy of a Quiet Title Action that I have filed on behalf of Leslie H. Smith, the present owner of the property formerly owned by Andrew Bloom also known as Andy Bloom. Mr. Bloom passed away in 2002 and we are attempting to clear the title to his property in order to settle his estate.

It is necessary that we serve you with notice of the Quiet Title Action as an heir of the late Charlotte Bloom. If you have any questions on the enclosed, you are advised to take it to your attorney and have him or her review it with you. You have twenty (20) days from the date of receipt of this Complaint to file an Answer to the Quiet Title Action Complaint. If you do not do so, any rights you that you might have had will be extinguished once a final Order is entered by the Court.

Obviously, there is no necessity for you to do anything if you do intend to pursue any claim.

Very truly yours,


Barbara J. Hugney-Shope

BJHS/mom

Enclosure

cc: Mr. Leslie Smith

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

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* NO. 07- 120 -C.D.
*
*** Type of Case: QUIET TITLE ACTION**
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*** Type of Pleading: COMPLAINT**
*
*** Filed on behalf of: PLAINTIFF**
LESLIE H. SMITH
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*** Counsel of record for Plaintiff:**
*
*** BARBARA J. HUGNEY-SHOPE**
*** ATTORNEY AT LAW ESQUIRE**
*
* Supreme Court I. D. No. 26274
* 23 North Second Street
* Clearfield, PA 16830
* (814) 765-5155
*

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

JAN 25 2007

Attest.



William L. Shope
Prothonotary/
Clerk of Courts

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

LESLIE H. SMITH, a single adult,
Plaintiff

VS.

VELMA KARADEEMA; DORIS (LOAR) * NO. 07- -C.D.
SNYDER; JOY DIANE BEAUDIN; KARON *
ANN NEWMEISTER; CINDY LEE WELSH; * QUIET TITLE ACTION
TAMMY WELSH; ROBERT LeROY BEAN; *
KEITH A. KONNERTH, SR.; ROBERT A. *
KONNERTH, JR.; DAVID S. KONNERTH; *
and KATHY A. HUTTER, as Sole Surviving *
Intestate Heirs of CHARLOTTE BLOOM, *
Deceased, their heirs, executors, administrators, *
successors and assigns, and all other persons *
or entities in interest, known or unknown, *
claiming by and through or under them, *
Defendants *

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against these 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.

Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641, Ext. 5982

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

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

LESLIE H. SMITH, a single adult,
Plaintiff

*

*

*

vs.

*

*

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

* NO. 07- -C.D.

*

QUIET TITLE ACTION

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Defendants

COMPLAINT

AND NOW COMES, the Plaintiff, LESLIE H. SMITH, who by and through his attorney, BARBARA J. HUGNEY-SHOPE, ESQUIRE, files this complaint to quiet the title to certain real estate and in support thereof avers as follows:

1. That the Plaintiff, LESLIE H. SMITH, is an adult individual, who resides at 385 LeContes Mills Road, Frenchville, Pennsylvania 16836.

2. That the Defendants are the sole surviving intestate heirs at law of Charlotte Bloom, who died intestate December 12, 1968:

- (a) Velma Karadeema whose last known address was 5956 Route 76, Ripley, New York 14775-9727; however, she is believed to be deceased and her heirs are unknown;
- (b) Doris (Loar) Snyder whose last known address was R.D. #2, Box 92 Mayport, PA 16240;
- (c) Joy Diane Beaudin whose last known address was R.R. #1, Box 14 Mayport, PA 16240;
- (d) Karon Ann Newmeister whose last known address was P.O. Box 6581, Big Bear Lake, CA 92315;
- (e) Cindy Lee Welsh whose last known address was 437 7th Avenue Extension, Brockway, PA 15824;
- (f) Tammy Welsh whose last known address was 920 King Road, Brookville, PA 15825;
- (g) Robert LeRoy Bean whose last known address was 205 Shenks Ferry Road, Conastoga, PA 17516;
- (h) Keith A. Konnerth, Sr., whose last known address was 1403 W. 18th Street, Lorain, Ohio 44052;

(i) Robert A. Konnerth, Jr., whose last known address was 9315 Dorothy Drive, Streetsboro, Ohio 44241;

(j) David S. Konnerth whose last known address was P.O. Box 667, St. Petersburg, FL 33713; and

(k) Kathy A. Hutter whose last known address was 23768 Sunset Crossing Road, Diamond Bar, CA 91765.

3. That the Plaintiff is currently the owner of a certain piece or parcel of land situate in the Borough of Troutville, Clearfield County, Pennsylvania, hereinafter referred to as the "Premises" conveyed to him as joint tenant with right of survivorship with Andy Bloom by deed of Andy Bloom dated March 26, 1998, and recorded in Clearfield County Deeds and Records Book 1929, page 519 bounded and described as follows:

ALL that parcel or tract of land lying and being situate in the Borough of Troutville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a one-inch iron pipe set by this survey, said iron pipe being along the northern right-of-way line for S.R. 410 (Main Street) (60-foot right-of-way), and also being along the eastern line of a 12-foot unnamed alley, and also being the southwest corner of the herein-described tract; THENCE North 43 degrees 42 minutes West along said alley a distance of ninety-nine and seventy-two one-hundredths (99.72) feet to an iron pipe set by this survey; THENCE North 48 degrees 9 minutes East along line of land of Muth, formerly Bloom, a distance of sixty-three and five one-hundredths (63.05) feet to an iron pipe set by this survey; THENCE North 43 degrees 42 minutes West along line of land of Muth, formerly Bloom, a distance of one hundred sixteen and twenty one-hundredths (116.20) feet to an iron pipe set by this survey; THENCE North 46 degrees 45 minutes East

along lands now or formerly of Sally J. Knarr, a distance of sixty-three and two one-hundredths (63.02) feet to an iron pipe set by this survey, said iron pipe being the northeast corner of the hereindescribed parcel; THENCE South 43 degrees 42 minutes East along lands now or formerly of Eugene J. and Marianne Fyda, a distance of two hundred seventeen and forty-four one-hundredths (217.44) feet to a drill hole set in concrete sidewalk, being the southeast corner of the hereindescribed parcel; THENCE South 48 degrees 8 minutes West along the northern right-of-way line of S.R. 410, a distance one hundred twenty-six and nine one-hundredths (126.09) feet to a one-inch pipe set by this survey, the point of beginning.

CONTAINING 19,936.6 square feet or 0.46 acre, in accordance with the survey prepared by Alexander & Associates, Inc., dated June 5, 1996, and recorded in the Clearfield County Recorder's Office in Map File No. 1219.

4. By deed dated February 3, 1947, and recorded in Clearfield County Deed Book 381, at Page 502, G. J. Cochran and Mary Cochran, husband and wife, conveyed a certain piece or parcel of land of which the "Premises" was a part to Andy Bloom and Charlotte Bloom, husband and wife.

5. On October 10, 1963, Charlotte Bloom initiated an action for divorce against Andrew Bloom a/k/a Andy Bloom in Clearfield County filed to No. 312 September 1963. The divorce action was finalized by Decree of Court entered April 22, 1964.

6. On February 21, 1966, Charlotte Bloom commenced a Complaint in Equity-Partition against Andy Bloom, a/k/a Andrew Bloom, her then ex-husband, requesting that a trustee be appointed to sell the parties' jointly-owned real estate

and distribute the proceeds equally. This action was in filed in Clearfield County at No. 1 February, 1966.

7. On March 18, 1966, the said Andy Bloom, a/k/a Andrew Bloom, through counsel filed an Answer but no further action appears of record with regard to the partition of the real estate of which the "Premises" was a part.

8. Plaintiff believes and therefore avers that the reason for no further action with regard to the partition action was that the said Charlotte Bloom and Andy Bloom a/k/a Andrew Bloom reached an amicable agreement whereby the said Andy Bloom a/k/a Andrew Bloom acquired any interest of the said Charlotte Bloom in the "Premises" but for some unknown reason, a deed evidencing this conveyance was never recorded.

9. The said Andy Bloom, a/k/a Andrew Bloom, died testate on June 14, 2002, naming the Plaintiff as his sole testate heir.

10. From at least 1966 until the transfer to Andy Bloom and the Plaintiff on March 26, 1998, the "Premises" had been assessed solely to Andy Bloom a/k/a Andrew Bloom.

11. Since 1966 until the transfer to Andy Bloom and the Plaintiff, the said Andy Bloom has treated the property as his own, residing on it and maintaining it, as well as paying all taxes.

12. The said Charlotte Bloom died intestate on December 12, 1968, being survived by three (3) daughters, Velma Karadeema, Edna Clarke and Verna Henricks.

13. The said Velma Karadeema's last known address is 5056 Route 76, Ripley, New York, 14775-9727.

14. The said Edna Clarke died November 8, 1984, being survived by her spouse, Champe Clarke, and the issue of her deceased daughter, Marie Konnerth, who had died April 2, 1967.

15. The said Champe Clarke died August 3, 1992, survived by Keith A. Konnerth, Sr., Robert A. Konnerth, Jr., David S. Konnerth and Kathy A. Hutter, the issue of his deceased daughter, Marie Konnerth, all of whom are named as Defendants herein.

16. The said Verna Henricks died August 28, 1986, survived by one (1) son, James Harold Henricks.

17. The said James Harold Henricks died April 4, 1996, survived by three (3) daughters, namely, Doris (Loar) Snyder, Karon Ann Newmeister and Joy Diane Beaudin, and the issue of Sandra Freeman, his deceased daughter, namely Cindy Lee Welsh, Tammy Welsh and Robert LeRoy Bean, all of whom are named as Defendants herein.

18. That from 1966, Plaintiff and his predecessor in title, Andrew Bloom, to the present, have exercised open, notorious and hostile possession and control over the "Premises" to the exclusion of all others.

19. That this Quiet Title Action is necessary to remove any cloud on Plaintiff's title to the "Premises" due to any irregularities in the chain of title because of unrecorded deeds and/or assignments and other documents, incomplete estate records of deceased persons showing a complete chain of title, and possible adverse interests of named Defendants, their heirs, successors and assigns.

20. That at no time have any of the herein named Defendants attempted to secure possession of the said "Premises", contest the title of Plaintiff or his predecessor in title or assist in the maintenance, repair or improvement of the "Premises" nor have they asserted any interest adverse to the Plaintiff by any legal action.

WHEREFORE, Plaintiff requests:

(a) That the Defendants be forever barred from asserting any right, title, lien or interest in the Plaintiff's land inconsistent with the ownership of the Plaintiff, unless the Defendants bring an action of ejectment against the Plaintiff for recovery of the land within thirty (30) days after the entry of judgment by the Court;

- (b) That the Plaintiff be decreed as the sole owner and be entitled to exclusive possession of the premises described in the foregoing Complaint; and
- (c) That the Court make such further orders as may be necessary to establish the legal and valid title of the Plaintiff and to grant him appropriate relief.

Respectfully submitted,

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

VERIFICATION

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

Leslie H. Smith
Leslie H. Smith

Dated: Jan 15, 2007

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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* NO. 07-120-C.D.

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* **Type of Case: QUIET TITLE ACTION**

*

* **Type of Pleading: PRAECIPE TO**

* **REINSTATE COMPLAINT**

* **Filed on behalf of: PLAINTIFF**

* **LESLIE H. SMITH**

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* **Counsel of record for Plaintiff:**

*

* **BARBARA J. HUGNEY-SHOPE**

* **ATTORNEY AT LAW ESQUIRE**

*

* Supreme Court I. D. No. 26274

* 28478 Frenchville-Karthaus Hwy.

* P.O. Box 232

* Frenchville, PA 16836

* (814) 263-7357

*

FILED 3 Cc a 3 Compl.
07/16/07 Reinstated to
JUN 26 2007 Atty
Atty

William A. Shaw
Prothonotary/Clerk of Courts
Atty pd 7-00

(GK)

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

LESLIE H. SMITH, a single adult,
Plaintiff

VS.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them.

Defendants

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* NO. 07-120-C.D.
*
* **Type of Case: QUIET TITLE ACTION**
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* **Type of Pleading: PRAECIPE TO**
* **REINSTATE COMPLAINT**
* **Filed on behalf of: PLAINTIFF**
* **LESLIE H. SMITH**
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* **Counsel of record for Plaintiff:**
*
* **BARBARA J. HUGNEY-SHOPE**
* **ATTORNEY AT LAW**
*
* Supreme Court I. D. No. 26274
* 28478 Frenchville-Karthaus Hwy.
* P.O. Box 232
* Frenchville, PA 16836
* (814) 263-7357
*

FILED 1cc@1 Compl.
01/8/40 (57) Reinstated to
AUG 01 2007 Atty

William A. Shaw
Prothonotary/Clerk of Courts Atty pd. 7.00

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

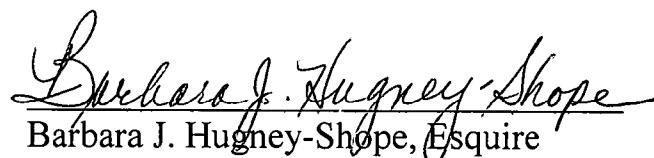
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NO. 07-120-C.D.
QUIET TITLE ACTION

PRAECIPE TO REINSTATE

TO WILLIAM A. SHAW, PROTHONOTARY:

Kindly reinstate the Complaint in Quiet Title in the above-captioned action.
It is necessary to reinstate this Complaint because the Sheriff's Office was unable
to served the Complaint on the remaining Defendants.


Barbara J. Hugney-Shoppe, Esquire
Attorney for Plaintiff

Dated: July 31, 2007

CA

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

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* NO. 07-120-C.D.

*

* **Type of Case: QUIET TITLE ACTION**

*

* **Type of Pleading: MOTION FOR
LEAVE TO SERVE BY
PUBLICATION; AFFIDAVIT
AND ORDER**

*

*

* **Filed on behalf of: PLAINTIFF
LESLIE H. SMITH**

*

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*

* **Counsel of record for Plaintiff:**

*

* **BARBARA J. HUGNEY-SHOPE
ATTORNEY AT LAW**

*

* Supreme Court I. D. No. 26274
* 28478 Frenchville-Karthaus Hwy.
* P.O. Box 232
* Frenchville, PA 16836
* (814) 263-7357

*

FILED

07-51201
AUG 01 2007

cc
GK

D. J. Shope

William A. Shaw
Prothonotary/Clerk of Courts

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

MOTION FOR LEAVE TO SERVE BY PUBLICATION

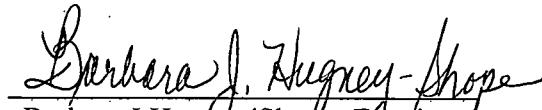
AND NOW, comes the Leslie H. Smith, Plaintiff, by and through his attorney, BARBARA J. HUGNEY-SHOPE, ESQUIRE, and sets forth the following Motion:

1. An Affidavit having been executed and filed on behalf of Plaintiff that the whereabouts of KARON ANN NEWMEISTER; TAMMY WELSH; and, KEITH A. KONNERTH, SR.; their heirs, executors, administrators, successors and assigns, and all other

persons or entities in interest, known or unknown, claiming by and through or under them, are unknown.

2. The Plaintiff, by his attorney, Barbara J. Hugney-Shope, Esquire, moves the Court for leave to serve the Complaint on these Defendants, their heirs, executors, administrators, successors and assigns, and all other persons or entities, known or unknown, claiming by and through or under them, by publication in The Progress of Clearfield, Pennsylvania, a newspaper of general circulation, and in the Clearfield County Legal Journal.

Respectfully submitted,



Barbara J. Hugney-Shope, Esquire
28478 Frenchville-Karthusas Hwy.
P.O. Box 232
Frenchville, PA 16836
Attorney for Plaintiff

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

LESLIE H. SMITH, a single adult,
Plaintiff

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VELMA KARADEEMA; DORIS (LOAR) * NO. 07-120 -C.D.
SNYDER; JOY DIANE BEAUDIN; KARON *
ANN NEWMEISTER; CINDY LEE WELSH; * QUIET TITLE ACTION
TAMMY WELSH; ROBERT LeROY BEAN; *
KEITH A. KONNERTH, SR.; ROBERT A. *
KONNERTH, JR.; DAVID S. KONNERTH; *
and KATHY A. HUTTER, as Sole Surviving *
Intestate Heirs of CHARLOTTE BLOOM, *
Deceased, their heirs, executors, administrators, *
successors and assigns, and all other persons *
or entities in interest, known or unknown, *
claiming by and through or under them, *
Defendants *

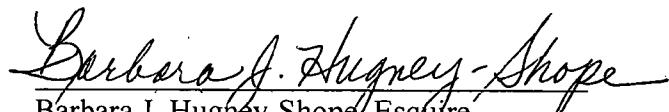
**AFFIDAVIT THAT THE DEFENDANTS OR
DEFENDANTS' WHEREABOUTS ARE UNKNOWN**

Before me, the undersigned officer, personally appeared Barbara J. Hugney-Shope, Esquire, attorney for the above-named Plaintiff, Leslie H. Smith, and being authorized to do so, declares that KARON ANN NEWMEISTER; TAMMY WELSH; and KEITH A. KONNERTH, SR.; their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known

or unknown, claiming by and through or under them, are either deceased or their present whereabouts are unknown to the Plaintiff.

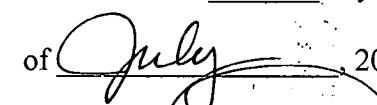
Plaintiff and the undersigned, his attorney, have made an investigation to locate these named Defendants by checking tax records of Clearfield County, review of telephone directories in the area, attempting service by USPS, Restricted Delivery, Certified mail, return receipt requested which have been returned as "Not Found" and by the Sheriff of Clearfield County, and none of these Defendants have been located by the Sheriff as indicated on his return as "Not Found" to be filed in this case.

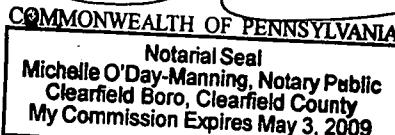
Respectfully submitted,


Barbara J. Hughey-Shope, Esquire
Attorney for Plaintiff

SWORN to and subscribed

before me this 31st day
of July, 2007.


Notary Public



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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them,

* * * * *

NO. 07-120 -C.D.

QUIET TITLE ACTION

William A. Shaw
Prothonotary/Clerk of Courts

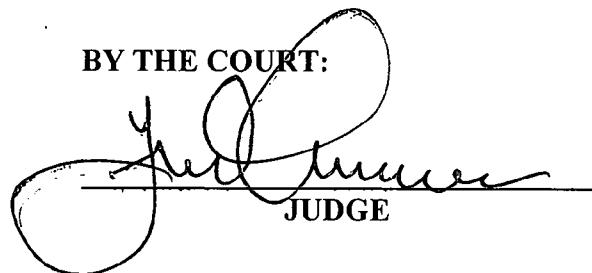
1.2.2. 8.7

ORDER FOR PUBLICATION

AND NOW, to wit, this 6 day of August, 2007, upon consideration of the foregoing Motion and Affidavit of Barbara J. Hugney-Shope, Attorney for Plaintiff, that the current whereabouts of KARON ANN NEWMEISTER; TAMMY WELSH; and, KEITH A. KONNERTH, SR.; their heirs, executors, administrators, successors, and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them are unknown, and that a good-faith effort has been made pursuant to PA.R.C.P. 430 to locate them, their heirs, successors and assigns, and that any heirs, successors

and assigns are unable to be located, Plaintiff is hereby granted leave to make service of the Complaint on all parties in interest in the property who cannot be personally served, and such heirs, executors, successors and assigns of Defendants who are presently not of record and cannot be determined after due investigation, by publication one (1) time in The Progress of Clearfield, Pennsylvania, being a newspaper of general circulation in the County of Clearfield, Pennsylvania, and in the Clearfield County Legal Journal.

BY THE COURT:

A handwritten signature in black ink, appearing to read "John J. ...".

John J. ...
JUDGE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102959
NO: 07-120-CD
SERVICE # 1 OF 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH
VS.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, June 29, 2007, SHERIFF OF BUTLER COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON JOY DIANE BEAUDIN.

NOW, July 19, 2007 AT 12:10 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON JOY DIANE BEAUDIN, DEFENDANT. THE RETURN OF BUTLER COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

FILED

07-4054
SEP 12 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102959
NO: 07-120-CD
SERVICE # 2 OF 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH
vs.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

NOW, June 29, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON DORIS (LOAR) SNYDER.

NOW, July 20, 2007 AT 9:40 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON DORIS (LOAR) SNYDER, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102959
NO: 07-120-CD
SERVICES 2
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: LESLIE H. SMITH
VS.
DEFENDANT: VELMA KARADEEMA et al

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	HUGNEY-SHOPE	4402	20.00
SHERIFF HAWKINS	HUGNEY-SHOPE	4402	24.00
JEFFERSON CO.	HUGNEY-SHOPE	4403	62.68
BUTLER CO.	HUGNEY-SHOPE	4404	27.89

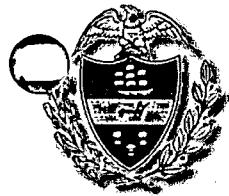
Sworn to Before Me This

____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

County of Butler, Pennsylvania



Office of County Sheriff Dennis C. Rickard, Sheriff

Douglas R. Hays, Chief Deputy

Thomas W. King, III, Solicitor

Court Docket #: 2007-120 CLE

Sheriff File Number – 07001659

County of Butler County, Commonwealth of Pennsylvania

LESLIE H SMITH

vs.

VELMA KARADEEMA; ET AL; JOY DIANE BEAUDIN

Affidavit of Service

COMPLAINT IN CIVIL ACTION TO QUIET TITLE-
NOTICE TO DEFEND, COUNTS & VERIFICATION

I hereby CERTIFY and RETURN that on 7/19/2007 at 12:10PM at 325 MCKEAN ST, APT 211 BUTLER, PA 16001 the within COMPLAINT IN CIVIL ACTION TO QUIET TITLE- NOTICE TO DEFEND, COUNTS & VERIFICATION, was served on JOY DIANE BEAUDIN, the defendant named therein, in the following manner:

PERSONAL PERSON

By delivering to and leaving with JOY DIANE BEAUDIN personally a true copy thereof, said person being known or identified to me as the person mentioned and described therein.

Fees Received from Attorney: MILEAGE (\$0.89), NOTARY (\$4.00), SERVICE (\$9.00), WRIT (\$9.00), COPIES (\$5.00) Total Charges \$27.89

Attorney Name: BARBARA J HUGNEY-SHOPE, 23 N SECOND STREET, CLEARFIELD, PA 16830

Affirmed & Subscribed to before
Me July 23, 2007

Kevin Stiles
KEVIN STILES, Deputy Sheriff

Stenna M. Watters
Notary Public

My commission expires: _____

PROTHONOTARY OFFICIAL TITLE
COMMISSION EXPIRES FIRST MONDAY IN JAN. 2008

Dennis C. Rickard
Sheriff, Butler County, Pennsylvania
Dennis C. Rickard

No. 07-120 C.D.

Personally appeared before me, Bill Dombrowski, Deputy for Thomas A. Demko, Sheriff of Jefferson County, Pennsylvania, who according to law deposes and says that on July 20, 2007 at 9:40 o'clock A.M. served the Complaint Action to Quite Title upon DORIS (LOAR) SNYDER, Defendant, at the address of 29 Martz Farm Road, Mayport, Township of Ringgold, County of Jefferson, State of Pennsylvania, by handing to the defendant personally, a true copy of the Complaint and by making known to her the contents thereof.

Advance Costs Received:	\$125.00	
My Costs:	60.68	Paid
Prothy:	2.00	
Total Costs:	62.68	
REFUNDED:	\$ 62.32	

Sworn and subscribed
to before me this 23rd
day of July 2007
By Bill Dombrowski
My Commission Expires the
1st Monday, January 2010

So Answers,

Bill Dombrowski Deputy
Thomas A. Demko Sheriff
JEFFERSON 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 102959

TERM & NO. 07-120-CD

LESLIE H. SMITH

COMPLAINT ACTION TO QUIET TITLE

VS.

VELMA KARADEEMA et al

SERVE BY: 07/26/07

HEARING:

MAKE REFUND PAYABLE TO BARBARA J. HUGNEY-SHOPE, ESQ.

SERVE: JOY DIANE BEAUDIN

ADDRESS: R325 MCKEAN ST., APT 211, BUTLER, PA 16001

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby depelize the SHERIFF OF BUTLER COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, June 29, 2007.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

*

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* NO. 07-120-C.D.

*

* **Type of Case: QUIET TITLE ACTION**

*

* **Type of Pleading: AFFIDAVIT**

*

* **Filed on behalf of: PLAINTIFF**

* **LESLIE H. SMITH**

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* **Counsel of record for Plaintiff:**

*

* **BARBARA J. HUGNEY-SHOPE**

* **ATTORNEY AT LAW**

*

* Supreme Court I. D. No. 26274

* 28478 Frenchville-Karthaus Hwy.

* P.O. Box 232

* Frenchville, PA 16836

* (814) 263-7357

*

FILED

09/17/01
SEP 28 2001

ice
Amy
S. Shope

William A. Shaw
Prothonotary/Clerk of Courts

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them,

Defendants

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA

1

COUNTY OF CLEARFIELD

SS. 3

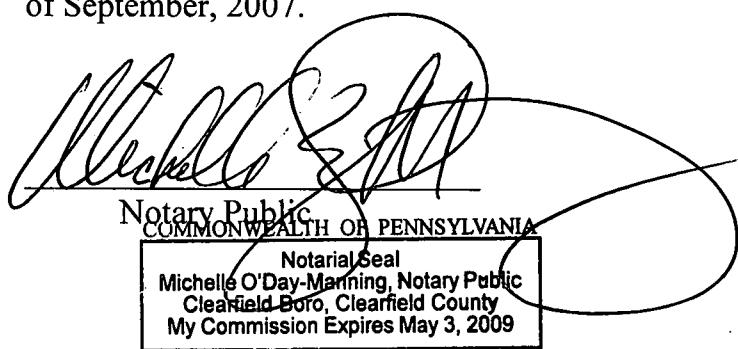
BARBARA J. HUGNEY-SHOPE, ESQUIRE, being duly sworn according to law, deposes and says that she is the attorney for the Plaintiff in the above-captioned action and makes this affidavit on behalf of Plaintiff, being authorized to do so; that a Complaint in Action to Quiet Title, endorsed with a Notice to Defend within twenty (20) days from service thereof was served on the Defendants, VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.;

ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them. Defendants in Pennsylvania were served through the Sheriff of Clearfield County, by the Sheriff of Jefferson County, by the Sheriff of Lancaster County, by the Sheriff of Clarion County and by the Sheriff of Butler County, with Proof of Service being file of record. Defendants out of state were served by certified mail, return receipt requested, with Proof of Service filed of record. Further, Defendants that were "not found" or unknown, service was by publication in The Progress of Clearfield, Pennsylvania, on August 10, 2007, proof of which is attached hereto marked Exhibit "A," and the Clearfield County Legal Journal during the week of August 17, 2007, proof of which is attached hereto, marked Exhibit "B." Notice of Intention To File Praeclipe for Entry of Default Judgment was mailed on August 27, 2007, to all Defendants who were served. None of the Defendants have filed an Answer thereto although the time in which to do so has expired.



Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

SWORN to and subscribed
before me this 27th day
of September, 2007.



IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION-LAW
NO. 07-120-CD

LESLIE H. SMITH, Plaintiff

vs.
VELMA KARADEEMA; DORIS
BEAUDIN; KARON ANN NEW-
MEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY
BEAN; KEITH A. KONNERTH, SR.;
ROBERT A. KONNERTH, JR.;
DAVID S. KONNERTH; and KATHY
A. HUTTER, as Sole Surviving In-
testate Heirs of CHARLOTTE
BLOOM, Deceased, their heirs,
executors, administrators, suc-
cessors and assigns, and all other per-
sons or entities in interest, known
or unknown, claiming by and
through or under them, Defendants.

ACTION TO
QUIET TITLE
NOTICE

TO THE FOLLOWING DEFEN-
DANTS AND THEIR HEIRS, SUC-
CESSORS AND ASSIGNS: KAR-
ON ANN NEWMEISTER; TAMMY
WELSH; KEITH A. KONNERTH,
SR.

TAKE NOTICE that at No.
07-120-CD, in the Court of Com-
mon Pleas of Clearfield County,
Pennsylvania, Plaintiff, Leslie H.

Smith, filed this Complaint against
you, your heirs, executors, adminis-
trators, successors and assigns,
and all other persons or entities in
interest, known or unknown, claim-
ing by and through or under you,
averring that Leslie H. Smith is the
owner of:

ALL that certain parcel or tract of
land lying and being situate in the
Borough of Troutville, Clearfield
County, Pennsylvania, bounded
and described as follows:

BEGINNING at a one-inch iron
pipe set by this survey, said iron
pipe being along the northern right-
of-way line for S.R. 410 (Main
Street) (60-foot right-of-way), and
also being along the eastern line of
a 12-foot unnamed alley, and also
being the southwest corner of the
hereinafter described tract; THENCE
North 43 degrees 42 minutes West
along said alley a distance of ninety-
nine and seventy-two one-hun-
dredths (99.72) feet to an iron pipe
set by this survey; THENCE North
48 degrees 9 minutes East along
line of land of Muth, formerly Bloom,
a distance of sixty-three and five
one-hundredths (63.05) feet to an
iron pipe set by this survey;
THENCE North 43 degrees 42
minutes West along line of land of
Muth, formerly Bloom, a distance of
one hundred sixteen and twenty
one-hundredths (116.20) feet to
an iron pipe set by this survey;
THENCE North 46 degrees 45
minutes East along lands now or
formerly of Sally J. Knarr, a dis-
tance of sixty-three and two one-
hundredths (63.02) feet to an iron
pipe set by this survey, said iron
pipe being the northeast corner of
the hereinafter described parcel;
THENCE South 43 degrees 42
minutes East along lands now or
formerly of Eugene J. and Marianne
Fyda, a distance of two hundred
seventeen and forty-four one-hun-
dredths (217.44) feet to a small hole
set in concrete sidewalk, being the
southeast corner of the hereinafter
described parcel; THENCE South 48
degrees 8 minutes West along the
northern right-of-way line of S.R.
410, a distance one hundred
twenty-six and nine one-hun-
dredths (126.09) feet to a one-inch
pipe set by this survey, the point of
beginning.

BEING the same premises con-
veyed by deed dated March 26,
1998, and recorded in Deeds and
Records Book 1929, page 519,
consisting of 0.46 acre, more or
less, and identified as Clearfield
County Assessment Parcel No.
18-A6-305-44.

The Plaintiff claims absolute own-
ership of the above-described par-
cel of land; that the Plaintiff has in-
stituted suit in order to have his in-
terest in said land adjudicated and
that the Defendants be forever
barred from asserting any rights,
lien, title or interest in the said land
inconsistent with the interest of the
Plaintiff as set forth in the Compli-
ant.

YOU ARE NOTIFIED TO APPEAR
AND ANSWER THE SAID COM-
PLAINT ON SAID ACTION WITHIN
TWENTY (20) DAYS OF THIS NO-
TICE, OTHERWISE, JUDGMENT
WILL BE ENTERED AGAINST YOU
BARRING YOU FROM ANY
CLAIMS, RIGHTS OR INTEREST
INCONSISTENT THEREWITH.

IF YOU DO NOT HAVE A LAW-
YER OR CANNOT AFFORD ONE,
GO TO OR TELEPHONE THE OF-
FICE SET FORTH BELOW TO
FIND OUT WHERE YOU CAN GET
LEGAL HELP.

COURT ADMINISTRATOR,
Clearfield County Courthouse,
Clearfield, Pennsylvania 16380.
Telephone: (814) 765-2641, Ext.
5982.

Barbara J. Hugney-Shope,
Esquire
28478
Frenchville-Karthaus Hwy.
(P.O. Box 232)
Frenchville, PA 16836
(814) 236-7357,
Attorney for Plaintiff

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA

: SS:

COUNTY OF CLEARFIELD

On this 24th day of August, A.D. 20 07
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 August 10, 2007.
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.

Margaret E. Krebs

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

EXHIBIT "A"

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
:
COUNTY OF CLEARFIELD : .

On this 17th day of August AD 2007, 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 August 17, 2007, Vol. 19, No. 33. 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.

Sharon J. Pusey
Notary Public
My Commission Expires

NOTARIAL SEAL
SHARON J. PUSEY, Notary Public
Houtzdale, Clearfield County, PA
My Commission Expires, April 7, 2011

Barbara J. Hugney-Shope
PO Box 232
Frenchville PA 16836

administrators, successors and assigns, and all other persons or entities, in interest, known or unknown, claiming by and through or under them, Defendants.

ACTION TO QUIET TITLE

NOTICE

TO THE FOLLOWING DEFENDANTS
AND THEIR HEIRS, SUCCESSORS AND
ASSIGNS; KARON ANN NEWMEISTER;
TAMMY WELSH; KEITH A. KONNERTH,
SR.

TAKE NOTICE that at No. 07-120-CD, in the Court of Common Pleas of Clearfield County, Pennsylvania, Plaintiff, Leslie H. Smith, filed this Complaint against you, your heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under you, averring that Leslie H. Smith is the owner of ALL that certain parcel or tract of land lying and being situated in the Borough of Troutville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a one-inch iron pipe set by this survey, said iron pipe being along the northern right-of-way line for S.R. 410 (Main Street) (60-foot right-of-way), and also being along the eastern line of a 12-foot unnamed alley, and also being the southwest corner of the herein-described tract: THENCE North 43 degrees 42 minutes West along said alley a distance of ninety-nine and seventy-two one-hundredths (99.72) feet to iron pipe set by this survey; THENCE North 48 degrees 9 minutes East along line of land of Muth, formerly Bloom, a distance of sixty-three and five one-hundredths (63.05) feet to an iron pipe set by this survey; THENCE North 43 degrees 42 minutes West along line of land of Muth, formerly Bloom, a distance of one hundred sixteen and twenty one-hundredths (116.20) feet to an iron pipe set by this survey; THENCE North 46 degrees 45 minutes East along lands now or formerly of Sally J. Knarr, a distance of sixty-three and two, one hundredths (63.02) feet to an iron pipe set by this survey, said iron pipe being the northeast corner of there herein-described parcel; THENCE South 43 degrees 42 minutes East along lands now or formerly of Eugene J. and Marianne Fyda, a distance of two hundred seventeen and forty-four one-hundredths (217.44) feet to a drill hole set in concrete sidewalk, being the southeast corner of the herein-described parcel; THENCE South 48 degrees 8 minutes West along the northern right-of-way line of S.R. 410, a distance of one hundred twenty-six and nine-one-hundredths (126.09) feet to a one-inch pipe set by this survey, the point of beginning. BEING the same premises conveyed by deed dated March 26, 1998, and recorded in

Deeds and Records Book 1929, page 519, consisting of 0.46 acre, more or less, and identified as Clearfield County Assessment Parcel No. 18-A6-305-44.

The Plaintiff claims absolute ownership of the above-described parcel of land; that the Plaintiff has instituted suit in order to have his interest in said land adjudicated and that the Defendants be forever barred from asserting any rights, lien, title or interest in the said land inconsistent with the interest of the Plaintiff as set forth in the Complaint.

YOU ARE NOTIFIED TO APPEAR AND ANSWER THE SAID COMPLAINT ON SAID ACTION WITHIN TWENTY (20) DAYS OF THIS NOTICE, OTHERWISE, JUDGMENT WILL BE ENTERED AGAINST YOU BARRING YOU FROM ANY CLAIMS, RIGHTS OR INTEREST INCONSISTENT THEREWITH.

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, Clearfield County Courthouse, Clearfield, Pennsylvania 16830. Telephone: (814) 765-2641, Ext. 5982.

Barbara J. Hugney-Shape, Esquire, 28478 Frenchville-Karthaus Hwy. (P.O. Box 232), Frenchville, PA 16836 (814) 263-7357. Attorney for Plaintiff.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW
NO. 07-120-CD

LESLIE H. SMITH Plaintiff vs. VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LEROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors,

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

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* NO. 07-120-C.D.

* **Type of Case: QUIET TITLE ACTION**

FILED
09/17/01 Atty
SEP 28 2001
S. Shape
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

AND NOW, this 26th day of September, 2007, I, BARBARA J.
HUGNEY-SHOPE, ESQUIRE, who, being duly sworn according to law, deposes and
says that I served a true and correct copy of the Notice of Intention to File Praeclipe
for Entry of Default Judgment, filed in the above-captioned matter, upon Defendants,
VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN;
CINDY LEE WELSH; ROBERT LeROY BEAN; ROBERT A. KONNERTH, JR.;
DAVID KONNERTH, and KATHY HUTTER; by depositing said Notice with the
UNITED STATE POSTAL SERVICE postage prepaid, to the Defendants at their last

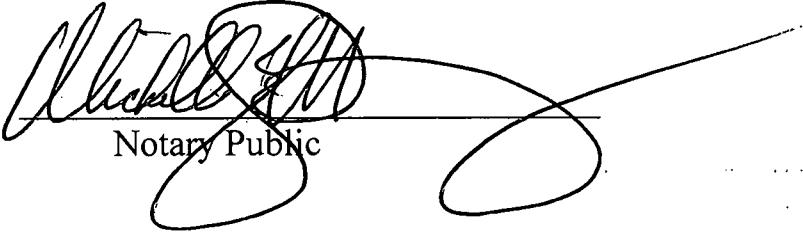
known addresses, with service having been made on August 22, 2007, as evidenced by the Certificate of Mailing receipts attached hereto.

Barbara J. Hugney-Shope
Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

SWORN to and subscribed

before me this 26 th day of

September, 2007.


Notary Public

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

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NO. 07- 120-C.D.
QUIET TITLE ACTION

**NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT
JUDGMENT**

TO: VELMA KARADEEMA
560 Fairmont Ave.
Jamestown, NY 14701

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. 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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

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

Barbara J. Hugney-Shope

Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE — POSTMASTER		
Received From:		
<u>Barbara J. Hugney-Shope, Esq.</u> <u>P.O. Box 232</u> <u>Frenchville PA 16836</u>		
One piece of ordinary mail addressed to:		
<u>Velma Kara deema</u> <u>560 Fairmont Ave.</u> <u>Jamestown, NY 14701</u>		

Affix fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for fees.



PS Form 3817, Mar. 1989

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

LESLIE H. SMITH, a single adult,
Plaintiff

*

vs.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them.

* NO. 07-120-C.D

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QUIET TITLE ACTION

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NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO: DORIS (LOAR) SNYDER
29 Martz Farm Road
Mayport, PA 16240

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. 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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

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

Barbara J. Hugney-Shape

Barbara J. Hugney-Shape, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER		
Received From:		
<u>Barbara J. Hugney-Shape, Esq.</u> <u>POB 232</u> <u>Frenchville, PA 16836</u>		
One piece of ordinary mail addressed to:		
<u>Doris (Loar) Snyder</u> <u>29 Marts. Farm Rd.</u> <u>Mayport, PA 16240</u>		

Affix fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for current



PS Form 3817, Mar. 1989

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

LESLIE H. SMITH, a single adult,
Plaintiff

VS.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them,

**NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT
JUDGMENT**

TO: JOY DIANE BEAUDIN
325 S. McKean St., Apt. 211
Butler, PA 16001

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. 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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

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

Barbara J. Hugney-Shope

Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE — POSTMASTER		
Received From:		
<u>Barbara J. Hugney - Shope, Esq.</u> <u>PO Box 232</u> <u>Frenchville PA 16836</u>		
One piece of ordinary mail addressed to:		
<u>Joy Diane Beaudin</u> <u>325 S. McKean St., Apt. 2</u> <u>Butler PA 16001</u>		

Affix fee here in stamps
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PS Form 3817, Mar. 1989

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

LESLIE H. SMITH, a single adult,
Plaintiff

* * *

VS.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them.

* NO. 07-120-C.D.
*
* QUIET TITLE ACTION

Defendants

NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO: CINDY LEE WELSH
437 7th Ave., Ext.
Brockway, PA

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. 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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

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

Barbara J. Hugney-Shope

Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE — POSTMASTER		
Received From: <i>Barbara J. Hugney Shope, Esq.</i> <i>POB 232</i> <i>Frenchville PA 16836</i>		
One piece of ordinary mail addressed to: <i>Cindy Lee Welsh</i> <i>437 7th Ave Ext.</i> <i>Brockway PA 15824</i>		

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post mark. Inquire of
Postmaster for current
fees.



PS Form 3817, Mar. 1989

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,
Defendants

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NO. 07- 120-C.D.
QUIET TITLE ACTION

**NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT
JUDGMENT**

TO: ROBERT LeROY BEAN
1069 Williamsburg Road
Lancaster, PA 17603

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS
FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST
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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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

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

Barbara J. Hugney-Shope

Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER		
Received From:		
<u>Barbara J. Hugney-Shope, Esq.</u> <u>POB 232</u> <u>Frenchville PA 16836</u>		
One piece of ordinary mail addressed to:		
<u>Robert + LaRay Bear</u> <u>1069 Williamsburg Rd.</u> <u>Lancaster PA 17603</u>		

PS Form 3817, Mar. 1989

Affix fee here in stamps
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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NO. 07- 120-C.D.
QUIET TITLE ACTION

**NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT
JUDGMENT**

TO: ROBERT KONNERTH, JR.
9315 Dorothy Drive
Streetsboro, OH 44241

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS
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TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

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

Barbara J. Hugney-Shape

Barbara J. Hugney-Shape, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE — POSTMASTER			
Received From: <i>Barbara J. Hugney-Shape, Esq.</i> <i>P.O. 232</i> <i>Frenchville PA 16836</i>			
One piece of ordinary mail addressed to: <i>Robert Konnerth, Jr.</i> <i>9315 Dorothy Dr.</i> <i>Streetsboro, OH 44241</i>			

Affix fee here in stamps
or meter postage and
paid postage on back of
envelope



PS Form 3817, Mar. 1989

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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* NO. 07- 120-C.D.
*
* QUIET TITLE ACTION
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**NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT
JUDGMENT**

TO: DAVID KONNERTH
6950 46th Ave. N. #20
St. Petersburg, FL 33713

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS
FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST
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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
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

Barbara J. Hugney-Shope

Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE — POSTMASTER		
Received From: <i>Barbara J. Hugney-Shope, Esq. POB 232 Frenchville PA 16836</i>		
One piece of ordinary mail addressed to: <i>David Konnerth 6950 46th Ave. N. #20 St. Petersburg FL 33713</i>		

Affix fee here in stamps
or meter postage and
post mark *Frenchville, PA*
fe



PS Form 3817, Mar. 1989

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them.

Defendants

NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO: KATHY HUTTER
2376 Sunset Crossing Road
Diamond Bar, CA 91765

DATE OF NOTICE: August 22, 2007

IMPORTANT NOTICE

**YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION
REQUIRED OF YOU IN THIS CASE. 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
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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
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

Barbara J. Hugney-Shape

Barbara J. Hugney-Shape, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE — POSTMASTER			
Received From:			
<u>Barbara J. Hugney-Shape, Esq.</u> <u>POB 232</u> <u>Frenchville PA 16836</u>			
One piece of ordinary mail addressed to:			
<u>Kathy Hutter</u> <u>2376 Sunset Crossing Rd.</u> <u>Diamond Bar, CA 91765</u>			

PS Form 3817, Mar. 1989

Affix fee here in stamps
or meter postage and
prepaid postage of
Plaintiff
fee.



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

LESLIE H. SMITH, a single adult,
Plaintiff

VS.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them,

Defendants

* * * * *

NO. 07-120-C.D.

*** Type of Case: QUIET TITLE ACTION**

*** Type of Pleading: MOTION FOR**

* JUDGMENT

* Filed on behalf of: PLAINTIFF

LESLIE H. SMITH

* * * * *

*** Counsel of record for Plaintiff:**

* BARBARA J. HUGNEY-SHOPE
* ATTORNEY AT LAW

- * Supreme Court I. D. No. 26274
- * 28478 Frenchville-Karthaus Hwy.
- * P.O. Box 232
- * Frenchville, PA 16836
- * (814) 263-7357

FILED 09/17/04 11:00 AM
SEP 28 2004 Atty
William A. Shaw
Prothonotary/Clerk of Courts
Shope
GK

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

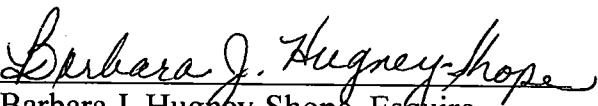
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NO. 07- 120-C.D.
QUIET TITLE ACTION

MOTION FOR JUDGMENT

NOW, this 27th day of September, 2007, Affidavits having been filed by the Plaintiff, Leslie H. Smith, through his attorney, Barbara J. Hugney-Shope, Esquire, that the Complaint with Notice to Defend was served on the Defendants, Doris (Loar) Snyder, Joy Diane Beaudin, Cindy Lee Welsh, Robert LeRoy Bean, by service from the Sheriff's Department. A Complaint with Notice to Defend was served on the Defendants, David Konnerth, Velma Karadeema, Robert A. Konnerth, Jr., and Kathy Hutter, by depositing the same with the U.S. Postal Service, postage prepaid, certified mail, return receipt. A Notice of Intention to File Praeclipe for Entry of Default Judgment was served on above Defendants on August 22, 2007, by USPS, Certificate of Mailing, 1st class mail, postage prepaid, and of all these Defendants have failed to answer or enter an appearance. A Complaint with

Notice to Defend was served on the Defendants, Karon Ann Newmeister, Tammy Welsh, and Keith A. Konnerth, Sr., by publication on August 10, 2007, in The Progress, and on August 17, 2007, in the Clearfield County Legal Journal, and these Defendants also have failed to answer or enter an appearance. More than twenty (20) days have elapsed since Notice of Default was sent to the Defendants whose whereabouts are known and more than twenty (20) days have elapsed since publication to the Defendants whose whereabouts are unknown. Based on the foregoing, the Plaintiff moves the Court to enter judgment in favor of the Plaintiff and against the Defendants in the above-captioned case, and to grant the Plaintiff the relief prayed for in accordance with the Pennsylvania Rules of Civil Procedure 1066. Plaintiff further requests that the Honorable Court, in accordance with the Pennsylvania Rules of Civil Procedure, Rule 248, require the Defendants within thirty(30) days to assert any right, lien, title or interest in the land inconsistent with the interest or claim Plaintiff sets forth in his Complaint.


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff
28478 Frenchville-Karthaus Hwy.
P.O. Box 232
Frenchville, PA 16836
(814) 263-7357

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

LESLIE H. SMITH, a single adult,
Plaintiff

VS.

VELMA KARADEEMA; DORIS (LOAR) SNYDER; JOY DIANE BEAUDIN; KARON ANN NEWMEISTER; CINDY LEE WELSH; TAMMY WELSH; ROBERT LeROY BEAN; KEITH A. KONNERTH, SR.; ROBERT A. KONNERTH, JR.; DAVID S. KONNERTH; and KATHY A. HUTTER, as Sole Surviving Intestate Heirs of CHARLOTTE BLOOM, Deceased, their heirs, executors, administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them,

Defendants

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NO. 07-120-C.D.

*** Type of Case: QUIET TITLE ACTION**

*** Type of Pleading: ORDER OF COURT**

* Evidences of the use of the PIA INSTITUTE

* LESLIE H. SMITH

* * * * *

* Counsel of record for Plaintiff:

* BARBARA J. HUGNEY-SHOPE

* ATTORNEY AT LAW

200

* Supreme Court I. D. No. 26274

* 28478 Frenchville-Karthaus Hwy.

* P.O. Box 232

* Frenchville, PA 16836

* (814) 263-7357

*

FILED
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William A. Shaw
Notary/Clerk of Courts (6K)

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR) * NO. 07- 120-C.D.
SNYDER; JOY DIANE BEAUDIN; KARON *
ANN NEWMEISTER; CINDY LEE WELSH; * QUIET TITLE ACTION
TAMMY WELSH; ROBERT LeROY BEAN; *
KEITH A. KONNERTH, SR.; ROBERT A. *
KONNERTH, JR.; DAVID S. KONNERTH; *
and KATHY A. HUTTER, as Sole Surviving *
Intestate Heirs of CHARLOTTE BLOOM, *
Deceased, their heirs, executors, administrators, *
successors and assigns, and all other persons *
or entities in interest, known or unknown, *
claiming by and through or under them, *
*
Defendants *

ORDER OF COURT

AND NOW, this 28 day of Sept, 2007, an Affidavit having been made that service was made through the Clearfield County's Sheriff Office on Doris (Loar) Snyder, Joy Diane Beaudin, Cindy Lee Welsh and on Robert LeRoy Bean, and through the U. S. Postal Service, postage prepaid, certified mail, return receipt requested, on David Konnerth, Velma Karadeema, Robert A. Konnerth, Jr., and Kathy Hutter, and that Notice of Intent to Take Default Judgment was served on these Defendants, with these Defendants having failed to answer or enter an appearance. Further, that service was made by publication on Karen Ann Newmeister; Tammy Welsh and Keith A. Konnerth, Sr., their heirs, executors,

administrators, successors and assigns, and all other persons or entities in interest, known or unknown, claiming by and through or under them, in The Clearfield Progress, Clearfield, Pennsylvania, and in the Clearfield County Legal Journal and it appearing that it was impossible to serve any of these Defendants by any other means.

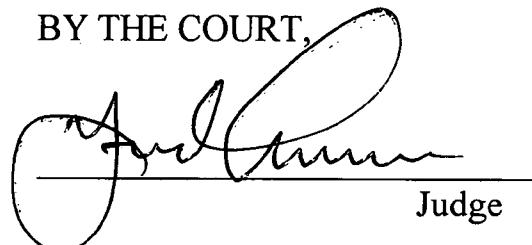
IT IS ORDERED AND DECREED, that Defendants file suit in ejectment or otherwise enter a proceeding to contest the case within thirty (30) days, or this Order of Court shall become final upon Praecept by Plaintiff, which hereby Orders and Decrees that title to the land subject of this action is vested absolutely in the Plaintiff, his heirs and assigns, free and clear of any and all claims of any nature by these Defendants, their successors or assigns or anyone claiming by, through or under them, or any of them, and that the Plaintiff is seized of an indefeasible title to the land situated in the Borough of Troutville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a one-inch iron pipe set by this survey, said iron pipe being along the northern right-of-way line for S.R. 410 (Main Street) (60-foot right-of-way), and also being along the eastern line of a 12-foot unnamed alley, and also being the southwest corner of the herein-described tract; THENCE North 43 degrees 42 minutes West along said alley a distance of ninety-nine and seventy-two one-hundredths (99.72) feet to an iron pipe set by this survey; THENCE North 48 degrees 9 minutes East along line of land of Muth, formerly Bloom, a distance of sixty-three and five one-hundredths (63.05) feet to an iron pipe set by this survey; THENCE North 43 degrees 42 minutes West along line of land of Muth, formerly Bloom, a distance of one hundred sixteen and twenty one-hundredths (116.20) feet to an iron pipe set by this survey; THENCE North 46 degrees 45 minutes East along

lands now or formerly of Sally J. Knarr, a distance of sixty-three and two one-hundredths (63.02) feet to an iron pipe set by this survey, said iron pipe being the northeast corner of the herein-described parcel; THENCE South 43 degrees 42 minutes East along lands now or formerly of Eugene J. and Marianne Fyda, a distance of two hundred seventeen and forty-four one-hundredths (217.44) feet to a drill hole set in concrete sidewalk, being the southeast corner of the herein-described parcel; THENCE South 48 degrees 8 minutes West along the northern right-of-way line of S.R. 410, a distance one hundred twenty-six and nine one-hundredths (126.09) feet to a one-inch pipe set by this survey, the point of beginning.

BEING the same premises conveyed by deed dated March 26, 1998, and recorded in Deeds and Records Book 1929, page 519, consisting of 0.46 acre, more or less, and identified as Clearfield County Assessment Parcel No. 18-A6-305-44.

BY THE COURT,

A handwritten signature in black ink, appearing to read "John J. Dunn", is written over a horizontal line. A small circle is drawn to the left of the signature.

Judge

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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* NO. 07-120-C.D.

*

* Type of Case: QUIET TITLE ACTION

*

* Type of Pleading: PRAECIPE

*

* Filed on behalf of: PLAINTIFF
* LESLIE H. SMITH

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* Counsel of record for Plaintiff:

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* BARBARA J. HUGNEY-SHOPE

* ATTORNEY AT LAW

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* Supreme Court I. D. No. 26274

* 28478 Frenchville-Karthaus Hwy.

* P.O. Box 232

* Frenchville, PA 16836

* (814) 263-7357

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FILED
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OCT 31 2007
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William A. Shaw
Prothonotary/Clerk of Courts

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

LESLIE H. SMITH, a single adult,
Plaintiff

vs.

VELMA KARADEEMA; DORIS (LOAR)
SNYDER; JOY DIANE BEAUDIN; KARON
ANN NEWMEISTER; CINDY LEE WELSH;
TAMMY WELSH; ROBERT LeROY BEAN;
KEITH A. KONNERTH, SR.; ROBERT A.
KONNERTH, JR.; DAVID S. KONNERTH;
and KATHY A. HUTTER, as Sole Surviving
Intestate Heirs of CHARLOTTE BLOOM,
Deceased, their heirs, executors, administrators,
successors and assigns, and all other persons
or entities in interest, known or unknown,
claiming by and through or under them,

Defendants

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* NO. 07-120-C.D.

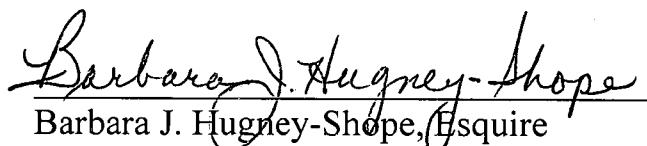
* **Type of Case: QUIET TITLE ACTION**

PRAECIPE

TO: WILLIAM A. SHAW, PROTHONOTARY

Please enter final judgment in favor of the above-named Plaintiff and against
the Defendants in accordance with Order of the above-named Court dated September
28, 2007.

Respectfully submitted,


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff