

07-663-CD
E. Woolridge et al vs Domtar Paper

Edward Wooldridge et al vs Domtar Paper
2007-663-CD

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

EDWARD O. WOOLRIDGE,
JOYCE W. SHAW and LOIS WOOLRIDGE,
Plaintiffs,

vs.

DOMTAR PAPER COMPANY, LLC,
Defendant

No. 2007- 663-cD

TYPE OF CASE:
QUIET TITLE ACTION

TYPE OF PLEADING:
COMPLAINT

FILED ON BEHALF OF:
PLAINTIFF

Attorney for this party:
Peter F. Smith, Esquire
Supreme Court No. 34291
30 South Second Street
P.O. Box 130
Clearfield, PA 16830
(814) 765-5595

FILED
04/23/2011
APR 26 2011
Atty pd \$95.00
William A. Shaw
Prothonotary/Clerk of Courts

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

EDWARD O. WOOLRIDGE, :
JOYCE W. SHAW and LOIS WOOLRIDGE, :
Plaintiffs : No. 2007-
:
:
:
vs. :
:
:
DOMTAR PAPER COMPANY, LLC, :
Defendant :
:

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, 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 other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF
YOU DO NOT HAVE OR CANNOT AFFORD A LAWYER, GO TO OR
TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE
YOU CAN GET LEGAL HELP.**

COURT ADMINISTRATOR
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641, ext. 5982

AMERICANS WITH DISABILITIES ACT OF 1990

The Court of Common Pleas of Clearfield County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the Court, please contact our office. All arrangements must be made at least 72 hours prior to any hearing or business before the Court. You must attend the scheduled conference or hearing.

Clearfield County Court Administrator
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641

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

EDWARD O. WOOLRIDGE,
JOYCE W. SHAW and LOIS WOOLRIDGE,
Plaintiffs : No. 2007-
vs. :
DOMTAR PAPER COMPANY, LLC,
Defendant :
:

COMPLAINT

COMES NOW, the Plaintiffs Edward O. Woolridge, Joyce W. Shaw and Lois Woolridge and their attorney Peter F. Smith, who state the following in support of this complaint:

1. The name of the first Plaintiff is Edward O. Woolridge, an adult individual, who resides at 1115 Chambersburg Road, Gettysburg, Pennsylvania 17325.
2. The name of the second Plaintiff is Joyce W. Shaw, an adult individual, who resides at 2309 Cass Street, Sarasota, Florida 34231.
3. The name of the third Plaintiff is Lois Woolridge, an adult individual, who resides at 512 North Pageant Drive No. A, Orange, California 92869.
4. The Plaintiffs are siblings. They are the heirs at law of Boyd F. Woolridge. Their relationship to Boyd F. Woolridge and the manner by which this title descended to them by inheritance is described in an Affidavit Affecting Title recorded at Clearfield County Instrument Number 200503449 on March 14, 2005. A true and correct copy of said Affidavit is attached hereto and incorporated herein by reference as Plaintiffs' Exhibit A.

5. The Defendant is Domtar Paper Company, LLC, a Delaware Limited Liability Company, with office at 100 Kingsley Park Drive, Fort Mill, South Carolina 29715-6476.

6. The Defendant owns real estate in Bradford Township, Clearfield County, Pennsylvania which is accessed from Pennsylvania Route SR-1010, and the Defendant is subject to the Court's jurisdiction in this action.

7. Plaintiffs' predecessor in title, Boyd Woolridge a/k/a Boyd F. Woolridge, acquired the premises subject to this Quiet Title Action by deed dated January 24, 1922 and recorded in Clearfield County Deed Book 255, Page 176 on January 30, 1922.

8. The premises subject to this Quiet Title Action are more particularly described in that deed as follows:

ALL the following described real estate situate in the Township of Bradford, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at a chestnut oak, corner of William McPherson, Francis Johnson and Charles Steward surveys, thence south by Charles Stewart survey one hundred and fifty seven and one-half (157 1/2) perches to a post; thence by Peter Young's improvement west one hundred and eleven and one-half (111 1/2) perches to a post; thence by residue of John Barkley survey, north one hundred and fifty seven and one-half (157 1/2) perches to a post on the old line; thence along said line, east one hundred and eleven and one-half (111 1/2) perches to the place of beginning, containing one hundred and three (103) acres and seven (7) perches and being part of the John Barkley warrant called "Sussex" and being the John Peters homestead property and having thereon a large farmhouse and barn, being about eighty-five (85) acres cleared and the remainder woodland with an orchard thereon, and being part of the same premises which Aaron Peters, Administrator John Peters, by deed dated the 4th day of April, 1913, said Deed being recorded in the office of the recorder of Deeds at Clearfield, in Deed Book Volume 200, page 166, et sec. conveyed to E. H. Woolridge.

EXCEPTING AND RESERVING, nevertheless, from this conveyance, all the coal, clay and other minerals excepting that seam or vein of coal which lies nearest to the surface, it being that seam or vein of coal which may be further described as the seam or vein of coal which E. H. Woolridge excepted from the coal and clay leased to the Mt. Union Refractories Company. That the said seam or vein of coal which is herein mentioned as not being excepted or reserved, the title of the said grantors herein is to vest under this Deed of Conveyance, in the grantee.

9. Plaintiffs' real estate subject to this Quiet Title Action is also described by Clearfield County Tax Map Number 106-M8-1 and assessed under the name of the "Boyd Woolridge Heirs." A survey map prepared for Plaintiff by Curry & Associates depicting the land subject to this action is attached hereto and incorporated herein by reference as Plaintiffs' Exhibit B.

10. The Defendant Domtar's predecessor, Weyerhaeuser Company, owned this parcel of real estate which adjoins the subject premises on its western boundary. Weyerhaeuser conveyed this property to Defendant Domtar Paper Company, LLC by deed dated February 27, 2007 and recorded at Clearfield County Instrument Number 200703943.

11. The deed from Weyerhaeuser to Domtar states that Weyerhaeuser is the sole member of Domtar Paper Company, LLC.

12. Weyerhaeuser acquired this property which adjoins the Plaintiffs' property on its western boundary when it merged with Willamette Industries, Inc. as recited in the deed at Clearfield County Instrument Number 200703943.

13. Willamette Industries, Inc. acquired this parcel which adjoins the Plaintiffs' property on its western boundary by deed dated August 2, 1993 and recorded in Clearfield County Record Volume 1550, Page 558.

14. As recited in the deed at Volume 1550, Page 558, the Defendant's predecessor in title, Willamette Industries, Inc., had its property surveyed prior to acquiring it and used the new survey description in its deed at Clearfield County Record Volume 1550, Page 558.

15. In conjunction with that survey, Defendant's predecessor's agents are believed to have had a 5/8 inch rebar pin set a distance of 132 feet into the Plaintiffs' property along its northern boundary. Thus, they attempted to move the true and actual northwest corner of the Plaintiffs' property which is the corresponding northeastern corner of the Defendant's property onto the

Plaintiffs' land.

16. These actions by Defendant and its agents have created a pie-shaped encroachment onto Plaintiffs' land.

17. The northwestern corner of Plaintiffs' land subject to this action has been well marked for decades.

18. Plaintiffs' northwestern corner had been generally recognized by all and, in particular, the Defendant's predecessors in title until the 1993 survey.

19. A dirt road which has existed for many decades meanders along and to either side of the boundary in question between Plaintiffs' and Defendant's lands.

20. Plaintiffs' record title to the land at issue is supported by their deed and the deeds in the chain of title.

21. In the alternative, Plaintiffs have been in open, notorious, exclusive, hostile and adverse possession of the portion of this property, which Defendant claims, for a period exceeding twenty-one years and has title by adverse possession.

22. Plaintiffs' predecessors in title and ancestors cleared this land and farmed it for many decades. Plaintiffs currently lease it to a third party for farming.

23. Plaintiffs have made repeated requests upon the Defendant to resolve this issue and remove its 5/8 inch rebar from its location on Plaintiffs' land and to respect Plaintiff's boundary, but Defendant has failed to do so.

WHEREFORE, Plaintiffs pray:

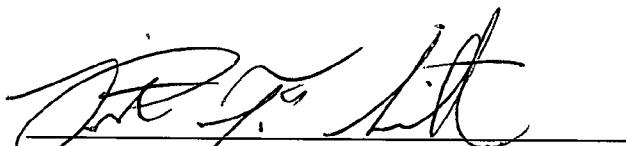
A. That this Honorable Court decree that Plaintiffs are the true, lawful and only owners of the premises described in paragraphs 7, 8 and 9 above; and

B. That Defendant, within 30 days of service of the complaint, institute action of ejectment against the Plaintiffs and that if they fail to do so, the Defendant be perpetually enjoined from setting up any title or a claim to the premises subject to this action from impeaching, denying or in any way attacking the Plaintiffs' title to the premises subject to this action, from issuing or maintaining an ejectment from said premises and from encumbering, mortgaging, leasing, conveying or otherwise attempting to transfer an interest in the premises or any part thereof; and

C. Such other relief as the Court may determine to be equitable.

Respectfully submitted,

Date: 4/23/09



Peter F. Smith, Esquire
Attorney for Plaintiffs

VERIFICATION

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

Date: 4/9/07

Edward O. Woolridge
Edward O. Woolridge

VERIFICATION

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

Date: 9/19/07

Joyce W. Shaw
Joyce W. Shaw

VERIFICATION

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

Date: 9/16/07

Lois Woolridge
Lois Woolridge

CLEARFIELD COUNTY RECORDER OF DEEDS

Karen L. Starck, Recorder
Maurene Inlow - Chief Deputy
P.O. Box 361
1 North Second Street, Suite 103
Clearfield, Pennsylvania 16830

***RETURN DOCUMENT TO:**

Instrument Number - 200503449

PETER SMITH

Recorded On 3/14/2005 At 12:40:42 PM

P.O. BOX 130

* Instrument Type - AFFIDAVIT OF REAL ESTATE

CLEARFIELD, PA 16830

* Total Pages - 5

Invoice Number - 126097

* Mortgagor - AFFIDAVIT OF

* Mortgagee - WOOLRIDGE, EDWARD O

* Customer - PETER SMITH

*** FEES**

STATE WRIT TAX	\$0.50
RECORDING FEES -	\$14.00
RECORDER	
RECORDER IMPROVEMENT	\$3.00
FUND	
COUNTY IMPROVEMENT FUND	\$2.00
TOTAL	\$19.50

I hereby CERTIFY that this document
is recorded in the Recorder's Office of
Clearfield County, Pennsylvania.



Karen L. Starck

Karen L. Starck
Recorder of Deeds

THIS IS A CERTIFICATION PAGE

Do Not Detach

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT

AFFIDAVIT AFFECTING TITLE

Index Under:	EDWARD H. WOOLRIDGE,	d/o/d 10/22/20
	BOYD F. WOOLRIDGE,	d/o/d 03/01/37
	NETTIE WOOLRIDGE,	d/o/d 12/16/41
	ERNEST G. WOOLRIDGE,	d/o/d 12/28/50
	GLADYS F. WOOLRIDGE,	d/o/d 09/23/74
	J. ORVIS WOOLRIDGE,	d/o/d 03/23/85

COMES NOW, Edward O. Woolridge, who being duly sworn according to law deposes and says:

1. My full name is Edward O. Woolridge. I reside at 1115 Chambersburg Road, Gettysburg, Pennsylvania 17325. I am more than 18 years of age and otherwise competent to make this Affidavit.
2. I am the grandson of **Edward H. Woolridge** who died testate on October 22, 1920. His estate appears at Clearfield County Estate Number 8704. His Last Will and Testament left the residue of the his estate, including the real estate subject of this Affidavit to his widow Nettie Woolridge and his three sons: Ernest G. Woolridge, Boyd F. Woolridge and J. Orvis Woolridge.
3. My uncle **Boyd F. Woolridge** died intestate on March 1, 1937. His estate appears at Clearfield County Estate Number 16374. His mother, my grandmother Nettie Woolridge was his sole heir.
4. My grandmother **Nettie Woolridge** died testate on December 16, 1941. Her estate appears at Clearfield County Estate Number 17897. Her Will left her entire estate to my uncle Ernest G. Woolridge and my father J. Orvis Woolridge.
5. My uncle **Ernest G. Woolridge** died testate on December 28, 1950. His estate appears at Clearfield County Estate Number 20960. His Will appears in Clearfield County Will Book Y, page 89. He devised the residue of his estate, including the subject real estate to his wife Gladys F. Woolridge.

6. Item 2 of the Last Will and Testament of Ernest G. Woolridge devised to my father J. Orvis Woolridge all Ernest G. Woolridge's undivided 1/2 interest in a parcel stated to be 85 acres in Bradford Township referred to as the "John Peters Homestead property," deed book reference of Deed Book "I" Page 135. However, that devise excepted and reserved all coal, clay, oil, gas and other minerals so only surface was conveyed to my father.

7. **Gladys F. Woolridge** died testate on September 23, 1974. Her estate appears at Clearfield County Estate Number 74-387.

8. The Last Will and Testament of Gladys F. Woolridge and the scheduled distribution filed in her estate devised all her real estate in Bradford Township to me Edward O. Woolridge. The inheritance tax return filed in her estate and other documents of record indicate that she died seized of an undivided 1/2 interest in 103 acres 7 perches deed book reference "I" Page 135 and a second undivided 1/2 interest in 32 acres, 64 perches and 52 acres 59 perches. These interests were distributed to me from the estate by instruments dated January 9, 1976 and recorded on January 13, 1976 at Clearfield County Deed Book 712, page 288.

9. My father **J. Orvis Woolridge** died testate March 23, 1985. His estate appears at Clearfield County Estate Number 85-150. The first Codicil to my father's Will dated October 1, 1984 and appearing in Clearfield County Will Book 51, Page 261 devised his entire estate to his three children, to wit: my sister Lois Woolridge, my sister Joyce W. Shaw and myself Edward O. Woolridge.

10. I am qualified to make this Affidavit because I am a member of the Woolridge family and a descendant of the individuals discussed.

11. The real estate which is the subject of this Affidavit consists of two parcels or interests:

PARCEL 1 - All that certain piece or parcel of land situate in Bradford Township, Clearfield County, Pennsylvania identified by Clearfield County Tax Map No. 106-M8-1MN. Consisting of 84.625 acres.

PARCEL 2- All that certain piece or parcel of land situate in Bradford Township, Clearfield County, Pennsylvania identified by Clearfield County Tax Map No. 106-L8-3. Consisting of 87 acres surface by deeds in Deed Book "S" Page 117 and in Deed Book "EE" Page 206.

12. I became the owner of the undivided 1/2 interest in the properties identified by Tax Map No. 106-M8-1MN and at Tax Map No. 106-L8-3 as an heir of the Gladys F. Woolridge Estate.

13. My sisters Lois Woolridge, Joyce W. Shaw and I became owners of the other undivided 50% interest in these parcels as the heirs of our father J. Orvis Woolridge.

14. The fractional shares of the owners of the subject real estate are:

- a. Joyce W. Shaw - 1/6
- b. Lois Woolridge - 1/6
- c. Edward O. Woolridge - 4/6

15. The current address of my sister Lois Woolridge is 512 North Pageant Drive No. A., Orange, CA 92869.

16. The current address of my sister Joyce W. Shaw is 2309 Cass Street, Sarasota, FL 34231.

FURTHER, the deponent sayeth not.

Date: 3/7/05

Edward O. Woolridge
Edward O. Woolridge

ACKNOWLEDGMENT

COMMONWEALTH OF PENNSYLVANIA

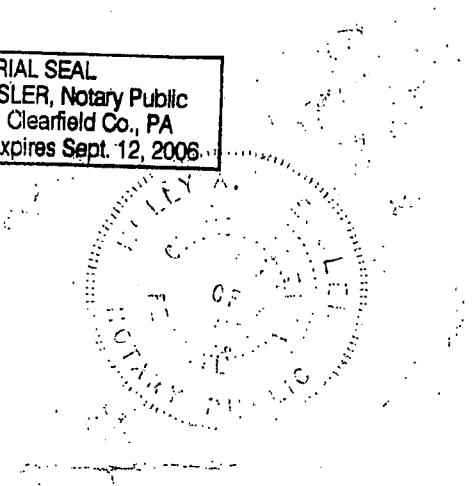
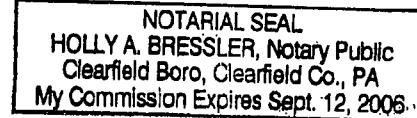
:SS

COUNTY OF CLEARFIELD

Before me, the undersigned officer, personally appeared EDWARD O. WOOLRIDGE, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument, and acknowledged that he executed the same for the purposes contained therein.

7th IN WITNESS WHEREOF, I have hereunto set my hand and official seal this
day of MARCH, 2005.

Holly A. Bressler
Notary Public



MATTHEW D. MAINES
AND
SHIRLEY G. MAINES

K.C. INVESTMENTS INC.

LINE BASED ON DEED DISTANCE
AND INTERIOR ANGLE

A diagram showing two parallel lines, each labeled "POWER LINE" in a bold, sans-serif font. The lines are oriented diagonally from the bottom-left to the top-right of the frame.

RAILROAD RAIL
(FOUND)
— LINE BASED ON MONUMENTATION

589°31'50"E

1777.51

AMETTE INDUSTRIES, INC.
1550/558
HESS AND FISHER 7/22/93

92.330 ACRES
INCLUDING 5.193 ACRES
PARCEL TO BE RESERVED

LANDS OF BOYD WOOLRIDGE HEIR:

OLD TURNPIKE ROAD

EXISTING ROAD

DRIVEWAY

CENTER LINE OF ROAD

PEN

APPROXIMATE LOCATION OF HOUSE

5.193 ACRERS TO BE RESERVED

NOW LANDS OF THE

LEGEND

ENG

NOW LANDS OF THE

LEGEND

ENGF

EXHIBIT B

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

EDWARD O. WOOLRIDGE, JOYCE W. SHAW :
And LOIS WOOLRIDGE, Plaintiffs : QUIET TITLE ACTION
Vs. : NO. 2007-663-CD
DOMTAR PAPER COMPANY, LLC, :
Defendant :

A N S W E R

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted that the description contained in paragraph 8 appears in the chain of title of the Plaintiff. To the extent that said description may overlap the land description contained in the Defendant's chain of title, it is specifically denied that the Plaintiffs have superior title.
9. Admitted that the lands owned by the Plaintiffs are described by Clearfield County Tax Map No. 106-M8-1 and are assessed under the name of "Boyd Woolridge Heirs". It is also admitted that the survey map attached to the complaint generally depicts the lands in the area in dispute. To the extent that the allegations contained in paragraph 9

FILED NOCC
MAY 23 2007 (GK)

William A. Shaw
Prothonotary/Clerk of Courts

suggest that Plaintiffs have superior title to any of the lands in dispute, such allegation is denied.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted.

15. Denied as stated. On the contrary, Defendant's surveyor placed a 5/8" rebar pin at the northeast corner of the lands of Willamette Industries, which rebar also marks the northwestern corner of the lands of the Plaintiffs. Neither the Defendant, nor its predecessor or agents, have moved any corners of the Plaintiffs' land.

16. Denied. On the contrary, the survey performed on behalf of Willamette Industries correctly located the common boundary between the lands of the Plaintiffs and the lands of the Defendant.

17. Denied. On the contrary, until Defendant's surveyor placed the said rebar, no monument existed at the northwestern corner of Plaintiffs' land.

18. Denied. On the contrary, said northwest corner was never definitively identified until the survey performed on behalf of Defendant's predecessor.

19. Denied as stated. An unimproved track meandered along and to either side of the common boundary between the Plaintiffs' and Defendant's lands.

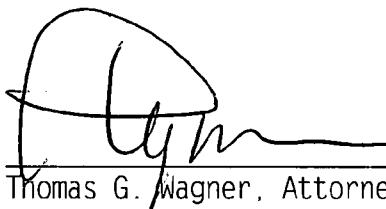
20. Denied. On the contrary, the land in dispute lies within the description contained in the Defendant's chain of title.

21. Denied. On the contrary, any use by the Plaintiffs or their predecessors in title to the unimproved track and to the lands in dispute has been sporadic, non-exclusive, non-hostile and not adverse; and Plaintiffs have not acquired any right or interest in the disputed property by adverse possession.

22. Denied. After reasonable investigation, Defendant is without information sufficient to form a belief as to the truth of this averment. Proof is demanded at trial.

23. Admitted, because the lands in question belong to the Defendant.

WHEREFORE, Defendant respectfully requests that the Complaint be dismissed, with costs upon the Plaintiffs.

A handwritten signature in black ink, appearing to read "T. G. Wagner".

Thomas G. Wagner, Attorney for Defendant

VERIFICATION

I, Lucas Dillinger, Wood Procurement Forester, Domtar Paper Company, LLC, having read the foregoing Answer, verify that the statements made therein are true and correct to the best of my personal knowledge or information and belief.

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

Lucas Dillinger

Date: 5/21/07

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

EDWARD O. WOOLRIDGE,
JOYCE W. SHAW and LOIS WOOLRIDGE,
Plaintiffs,

: No. 2007-663-CD

VS.

DOMTAR PAPER COMPANY, LLC,
Defendant

: TYPE OF PLEADING:
**CERTIFICATE PREREQUISITE
TO SERVICE OF SUBPOENA**

: FILED ON BEHALF OF:
PLAINTIFF

: Attorney for this party:
Peter F. Smith, Esquire
Supreme Court No. 34291
30 South Second Street
P.O. Box 130
Clearfield, PA 16830
(814) 765-5595

: Attorney for Defendant:
Thomas Wagner, Esquire
Pa ID No: _____
Meyer & Wagner Law Offices
115 Lafayette Street
St. Marys, PA 15857
(814) 781-3445

FILED NO
01/15/2011
AUG 02 2007
WM

William A. Shaw
Prothonotary/Clerk of Courts

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

EDWARD O. WOOLRIDGE,
JOYCE W. SHAW and LOIS WOOLRIDGE,
Plaintiffs : No. 2007-663-CD

VS. :

DOMTAR PAPER COMPANY, LLC,
Defendant :

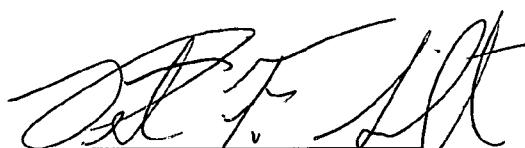
CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Plaintiff certifies that

- (1) a notice of intent to serve subpoena the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty (20) days prior to the date on which the subpoena is sought to be served,
- (2) a copy of the notice of intent, including the proposed subpoena, is attached to this certificate,
- (3) no objection to the subpoena has been received, and
- (4) the subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 7/30/07

By:


Peter F. Smith, Esquire
Attorney for the Plaintiffs

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

EDWARD O. WOOLRIDGE, :
JOYCE W. SHAW and LOIS WOOLRIDGE, :
Plaintiffs : No. 2007-663-CD
vs. :
DOMTAR PAPER COMPANY, LLC, :
Defendant :
:

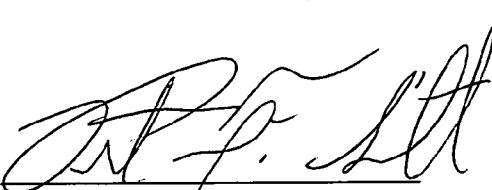
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS
AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Plaintiffs, Edward O. Woolridge, Joyce W. Shaw and Lois Woolridge, intend to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made the subpoena may be served.

Date:

6/24/07

By:


Peter F. Smith, Esquire
Attorney for the Plaintiffs

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

EDWARD O. WOOLRIDGE, :
JOYCE W. SHAW and LOIS WOOLRIDGE, :
Plaintiffs : No. 2007-663-CD

vs. :

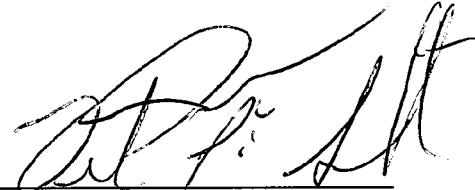
DOMTAR PAPER COMPANY, LLC, :
Defendant :
:

CERTIFICATE OF SERVICE

I, Peter F. Smith, Esquire, do hereby certify that a true and correct copy of the Certificate Prerequisite to Service of Subpoena was served as follows on the 1st day of August, 2007 by First Class Mail, Postage Prepaid on:

Thomas G. Wagner, Esquire
Atty. for Domtar Paper Company, LLC., Defendant
Meyer & Wagner Law Offices
115 Lafayette Street
St. Marys, PA 15857

Date: August 1, 2007

By: 
Peter F. Smith, Esquire

FILED
01015/01
AUG 02 2007
WM
William A. Shaw
Prothonotary/Clerk of Courts

FILED

AUG 02 2007

William A. Shaw
Prothonotary/Clerk of Courts

COMPLETE THIS SECTION

Please items 1, 2, and 3. Also complete
Restricted Delivery is desired.
Our name and address on the reverse
so we can return the card to you.
Attach this card to the back of the mailpiece,
on the front if space permits.

Addressed to:

DOMTAR PAPER COMPANY, LLC
100 Kingsley Park Drive
Fort Mill, SC 29715-6476

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Jean Frank

Agent

Addressee

B. Received by (Printed Name)

Jean Frank

C. Date of Delivery

5/7/04

D. Is delivery address different from item 1?

Yes

If YES, enter delivery address below:

No

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number

(Transfer from service label)

7006 0810 0001 4507 2643

UNITED STATES POSTAL SERVICE



First-Class
Postage &
USPS
Permit No. G

- Sender: Please print your name, address, and ZIP+4 in this box •

CHESTER A. HAWKINS
SHERIFF OF CLEARFIELD COUNTY,
1 N. 2nd ST., SUITE 116
CLEARFIELD, PA. 16830

102730

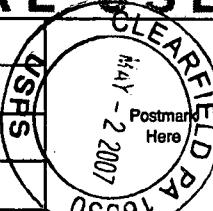
4492 4507 0000 03080 9007

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; *No Insurance Coverage Provided*)

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

OFFICIAL USE

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	5.36

USPS 

Send To
DOMTAR PAPER COMPANY, LLC
Street, Apt. No.; or PO Box No. 100 Kingsley Park Drive
City, State, ZIP+4 Fort Mill, SC 29715-6476

PS Form 3300, June 2002 See Reverse for Instructions

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- A unique identifier for your mailpiece
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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
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Internet access to delivery information is not available on mail
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102730

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102730
NO: 07-663-CD
SERVICE # 1 OF 1
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: EDWARD O. WOOLRIDGE, JOYCE W. SHAW & LOIS WOOLRIDGE

vs.

DEFENDANT: DOMTAR PAPER COMPANY , LLC

SHERIFF RETURN

NOW, May 07, 2007 SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON DOMTAR PAPER COMPANY , LLC DEFENDANT AT 100 KINGSLEY PARK DR, FORT MILL, SC, 29715-6476 BY CERTIFIED MAIL # 7006 0810 0001 4507 2643. THE RETURN RECEIPT IS HERETO ATTACHED ENDORSED BY JEAN FRANTZ.

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	SMITH	9859	10.00
SHERIFF HAWKINS	SMITH	9859	23.36

FILED
93:00 AM
OCT 01 2007
(Signature)

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2007

*Chester A. Hawkins
by Marilyn Hays*
Chester A. Hawkins
Sheriff

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

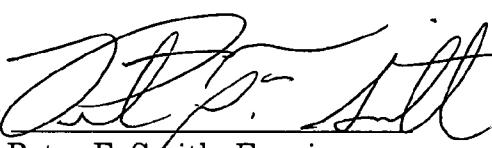
EDWARD O. WOOLRIDGE, :
JOYCE W. SHAW and LOIS WOOLRIDGE, :
Plaintiffs : No. 2007-663-CD
:
:
vs. :
:
:
DOMTAR PAPER COMPANY, LLC, :
Defendant :
:

CERTIFICATE OF SERVICE

I, Peter F. Smith, Esquire, do hereby certify that I sent a complete true and correct copy of All Materials Produced By Hess & Fisher Consisting Of The Hess & Fisher Documents Numbered 1 thru 77 by First Class Mail, Postage Prepaid on:

Thomas G. Wagner, Esquire
Atty. for Domtar Paper Company, LLC, Defendant
Meyer & Wagner Law Offices
115 Lafayette Street
St. Marys, PA 15857

Date: November 9, 2007

By: 
Peter F. Smith, Esquire

FILED *vecc*
M 10:44 64
NOV 13 2007
W
William A. Shaw
Prothonotary/Clerk of Courts

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

EDWARD O. WOOLRIDGE, : No. 2007-663-CD
JOYCE W. SHAW and :
LOIS WOOLRIDGE, :
Plaintiffs :
vs. :
DOMTAR PAPER COMPANY, LLC, :
Defendant :
:

PREACIPE

To: William A. Shaw, Sr., Prothonotary

Dear Sir:

Please list this case for Non-Jury Trial during the next term of Court.

Discovery is complete, and there are no outstanding Motions.

I estimate that 4 - 6 hours will be required to try this case.

Respectfully submitted,



Peter F. Smith, Esquire
Attorney for Plaintiffs

Date: November 30, 2007

Cc: Thomas G. Wagner, Esquire

FILED
01/30/2008
NOV 30 2007
100-25301
William A. Shaw
Prothonotary/Clerk of Courts

FILED

NOV 30 2007

William A. Shaner
Prothonotary/Clerk of Courts

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

EDWARD O. WOOLRIDGE, : No. 2007-663-CD
JOYCE W. SHAW and :
LOIS WOOLRIDGE, :
Plaintiffs :
vs. :
DOMTAR PAPER COMPANY, LLC, :
Defendant :
:

FILED NO CC
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NOV 30 2007
SJS

William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

I, Peter F. Smith, attorney for Plaintiff, certify that I sent a true and correct copy of PRAECIPE to List for Non-Jury Trial, to the Defendant's Attorney by First Class Mail, Postage Prepaid on November 30, 2007 to the following address:

Thomas G. Wagner, Esquire
Atty. for Domtar Paper Company, LLC, Defendant
Meyer & Wagner Law Offices
115 Lafayette Street
St. Marys, PA 15857

Respectfully submitted,

Date: November 30, 2007


Peter F. Smith, Esquire
Attorney for Defendants
30 South Second Street
P. O. Box 130
Clearfield, PA 16830
(814) 765-5595

FILED

NOV 30 2007

William A. Shea,
Prothonotary/Clerk of Courts

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

EDWARD O. WOOLRIDGE, JOYCE W. SHAW*
and LOIS WOOLRIDGE, *
Plaintiffs *
vs. * NO. 07-663-CD
DOMTAR PAPER COMPANY, LLC, *
Defendant *

ORDER

AND NOW, this 3rd day of December, 2007, it is the ORDER of this Court that
Pre-trial conference in the above matter shall be held on the 24th day of January, 2008
in Chambers at 9:30 a.m.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

FILED

01 15 2007
DEC 04 2007

CC Atty:

P. Smith
Wagner

William A. Shaw
Prothonotary/Clerk of Courts

(60)

FILED

DEC 04 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 12/4/07

You are responsible for serving all appropriate parties.
 The Prothonotary's office has provided service to the following parties:
 Plaintiff(s) Plaintiff(s) Attorney Other
 Defendant(s) Defendant(s) Attorney
 Special Instructions:

(1A)

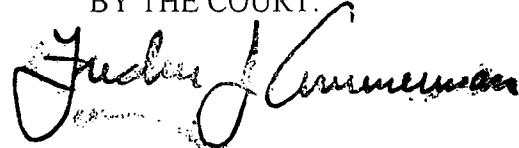
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION

EDWARD O. WOOLRIDGE, :
JOYCE W. SHAW and LOIS :
WOOLRIDGE :
Plaintiffs, :
vs. : NO. 2007-663-C.D.
DOMTAR PAPER COMPANY, LLC :
Defendant,

SCHEDULING ORDER

AND NOW, this 25th day of January 2008, following pre-trial conference, it is the ORDER of the Court that a Civil Bench Trial shall be and is hereby scheduled for the 30th day of April 2008 at 9:00 o'clock A.M. in Courtroom #1 of the Court of Common Pleas of Clearfield County, Pennsylvania.

BY THE COURT:



FREDRIC J. AMMERMAN
President Judge

FILED ^{10C}
01/10/2008 Atty's: P. Smith
JAN 28 2008 Wagner

William A. Shaw
Prothonotary/Clerk of Courts ⁽⁶⁾

FILED

JAN 28 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 1/28/08

..... You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

..... Special Instructions:

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

EDWARD O. WOOLRIDGE,
JOYCE W. SHAW and LOIS WOOLRIDGE,
Plaintiffs,

: No. 2007-663-CD

vs.

DOMTAR PAPER COMPANY, LLC,
Defendant

: TYPE OF PLEADING:
**JOINT PRAECIPE TO
DISCONTINUE**
: FILED ON BEHALF OF:
PLAINTIFFS & DEFENDANT

: Attorney for this Plaintiffs:
Peter F. Smith, Esquire
: Supreme Court No. 34291
: 30 South Second Street
: P.O. Box 130
: Clearfield, PA 16830
: (814) 765-5595

: Attorney for Defendant:
Thomas Wagner, Esquire
: Pa ID No: _____
: Meyer & Wagner Law Offices
: 115 Lafayette Street
: St. Marys, PA 15857
: (814) 781-3445

FILED No CC
0/3/2013
APR 12 2013
S/ William A. Shaw
Prothonotary/Clerk of Courts

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

EDWARD O. WOOLRIDGE,
JOYCE W. SHAW and
LOIS WOOLRIDGE,
Plaintiffs

vs. No. 2007-663-CD

DOMTAR PAPER COMPANY, LLC,
Defendant

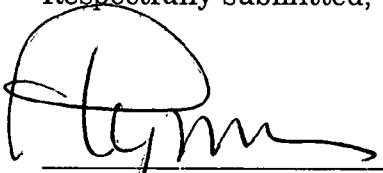
JOINT PREACIPE TO DISCONTINUE

To: William A. Shaw, Prothonotary

Dear Sir:

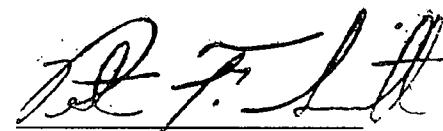
Comes now, Thomas G. Wagner, Attorney for Defendant and Peter F. Smith, Attorney for the Plaintiffs, we jointly request that the case be marked "**SETTLED & DISCONTINUED.**"

Respectfully submitted,



Thomas G. Wagner,
Attorney for Defendant

Date: 4/12/13



Peter F. Smith
Attorney for Plaintiffs