

07-711-CD

In Re: Lot No. 89 Section 9

In RE: Scott Knuselman et al  
2007-711-CD

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

In Re: Private Sale of Lot  
No. 89, Section 9  
of the Treasure Lake  
Subdivision, Sandy Twp.  
Clearfield County,

No. 07-711-CD

Type of Pleading:

**PETITION FOR DISAPPROVAL  
OF PRIVATE SALE**

Filed on Behalf of:

SCOTT KUNSELMAN  
and BRENDA KUNSELMAN

Counsel of Record for This  
Party:

S. Casey Bowers, Esq.  
Supreme Court No. 89032  
Hanak, Guido and Taladay  
P.O. Box 487  
DuBois, PA 15801

(814) 371-7768

FILED  
MAY 04 2007 3:00 PM 3cc  
Atty Bowers  
William A. Shaw  
Prothonotary/Clerk of Courts  
Atty pd.  
85.00

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

In Re: Private Sale of Lot No. 89, :  
Section 9 of the Treasure : No. \_\_\_\_\_  
Lake Subdivision, Sandy Twp. :  
:

**PETITION FOR DISAPPROVAL**  
**OF PRIVATE SALE**

AND NOW, comes the Petitioners, SCOTT KUNSELMAN and BREND  
A KUNSELMAN, husband and wife, by and through their attorneys, HANAK, GUIDO AND TALADAY, and hereby petition this Court to disapprove the private sale of a certain parcel of real property pursuant to 72 P.S. Section 5860.613, representing as follows:

1. Petitioners, SCOTT KUNSELMAN and BREND A KUNSELMAN, husband and wife, reside in the Treasure Lake Subdivision of Sandy Township, Clearfield County, Pennsylvania.
2. The Respondent is Clearfield County Tax Claim Bureau.
3. The real property subject to this petition supposedly owned by Stephen D. and Anne E. Kostella and is described as Section 9, Lot 89 of the Treasure Lake Subdivision, Sandy Township, Clearfield County, Pennsylvania, Tax Map Parcel No. 128-C02-009-00089-00-21.

4. The Respondent received a bid to sell the subject real property at private sale for a purchase price of \$50.00 free and clear of all tax liens.

5. Petitioners oppose said private sale of the subject real property as the proposed purchase price is woefully insufficient and would leave the respective taxing authorities for the most part uncompensated for the taxes now due and owing on the subject property.

6. Petitioners, SCOTT KUNSELMAN and BRENDA KUNSELMAN, hereby bid \$250.00 to purchase the subject real property free and clear of all tax liens.

WHEREFORE, Petitioners respectfully request this Court to disapprove the proposed private sale of the subject real property and fix a minimum purchase price for the property at \$250.00 together with any further relief this Court deems just and appropriate.

Respectfully submitted,



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S. Casey Bowers  
Attorney for Petitioners

**VERIFICATION**

Petitioners are unavailable and I, S. Casey Bowers, as attorney for Petitioners am authorized to verify that the statements contained in the foregoing PETITION FOR DISAPPROVAL OF PRIVATE SALE are correct to the best of my personal knowledge or information and belief based on information provided to me by the Petitioners.

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

DATE: 5-3-2007



S. Casey Bowers  
Attorney for Petitioners

FILED

MAY 04 2007

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

In Re: Private Sale of Lot No. 89, :  
Section 9 of the Treasure : No. 07-711-CD  
Lake Subdivision, Sandy Twp. :

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2007, upon  
consideration of the foregoing Petition, it is hereby ordered that:

- (1) a Rule is issued upon the Respondent to show cause why  
the Petitioners are not entitled to the relief requested;
- (2) the Respondent shall file an answer to the petition within  
twenty (20) days of service upon the Respondent;
- (3) the Petition shall be decided under Pa.R.C.P. 206.7;
- (4) an evidentiary hearing on disputed issues of material fact  
shall be held on \_\_\_\_\_, 2007, at \_\_\_\_\_ o'clock \_\_\_\_\_ m., in  
Courtroom No. \_\_\_\_\_ of the Clearfield County Courthouse.

BY THE COURT:

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

In re: Private Sale of :  
Lot No. 89, Section 9 of the : NO. 07-711-CD  
Treasure Lake Subdivision, :  
Sandy Township :

O R D E R

AND NOW, this 4th day of May, 2007, upon  
consideration of the foregoing Petition, it is hereby ORDERED  
that said Petition is granted and that the Respondent shall hold  
an auction of the subject real property. The minimum bid at  
said auction shall be \$250.00.

BY THE COURT.

Judge

FILED  
OCT 05 2004 3cc  
MAY 04 2004 Atty Bouwers  
IN (will serve)  
William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

**MAY 04 2007**

William A. Shaw  
Prothonotary/Clerk of Courts