

07-982-CD
Ronald Turner et al vs D.R. Woolridge et al

Ronald Turner et al vs Woolridge Estate
2007-982-CD

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

RONALD L. TURNER and
JUDITH A. TURNER, husband and wife,
Plaintiffs,

vs.

ESTATE OF D. R. WOOLRIDGE, a/k/a
DAVID R. WOOLRIDGE; RAYMOND H.
WOOLRIDGE; NANCY VIRGINIA
WOOLRIDGE; ELIZABETH JANE
KAUFFMAN; STEPHANIE ANN
WOOLRIDGE; CATHERINE SUZANNE
LANSBERRY; ANNA-VAUGHN LEE
KEPNER; EUGENIA MITCHELL LEE;
ELIZABETH JANE LEE; and JOSEPH J.
LEE, JR. 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. 07-982-CD
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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: PLAINTIFFS
* RONALD L. TURNER and
* JUDITH A. TURNER
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* Counsel of record for Plaintiffs:
*
* BARBARA J. HUGNEY-SHOPE
* ATTORNEY AT LAW
*
* Supreme Court I.D. No. 26274
* 28478 Frenchville-Karthus Hwy.
* P.O. Box 232
* Frenchville, PA 16836
* (814) 263-7357
*

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William A. Shaw
Prothonotary/Clerk of Courts

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William A. Shaw
Deputy Prothonotary

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claiming by and through or under them,
Defendants

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* No. 07- -CD

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* ACTION TO QUIET TITLE

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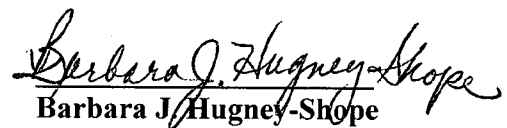
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NOTICE TO DEFEND

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 Plaintiffs. 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
Attorney for Plaintiffs

1. That the Plaintiffs, RONALD L. TURNER and JUDITH A. TURNER, are husband and wife, and reside at 1467 River Road Rear, Olanta, Clearfield County, Pennsylvania 16863.

2. That the Defendants, the heirs of the Estate of D. R. Woolridge, also known as David R. Woolridge, are as follows:

(a) Raymond H. Woolridge, an adult individual, whose last known address is 1301 Doris Street, Kannapolis, North Carolina 28083-2986;

(b) Nancy Virginia Woolridge, an adult individual, whose last known address is 100 North East 108th Street, Vancouver, Washington 98685-5262;

(c) Elizabeth Jane Kauffman, an adult individual, whose last known address is 450 del Moreno Drive, Woodland Hills, California 91364;

(d) Stephanie Ann Woolridge, an adult individual, whose last known address is 8 Lisa Way, Wayne, Pennsylvania 19087;

(e) Catherine Suzanne Lansberry, an adult individual, whose last known address is 430 Kathmere Avenue, Havertown, Pennsylvania 19803;

(f) Anna-Vaughn Lee Kepner, an adult individual, whose last known address is Bellwether Farm, 16452 Spielman Road, Williamsport, Maryland 21795;

(g) Eugenia Mitchell Lee, an adult individual, whose last known address is 10500 Weymouth Street, Apt 301, Bethesda, Maryland 20814;

(h) Elizabeth Jane Lee, an adult individual, whose last known address is 57 Lake Winds Road, Diamond Point, New York 12824; and

(i) Joseph J. Lee, Jr., an adult individual, whose last known address is 9 North Terrace Drive, Dillsburg, Pennsylvania 17019.

3. That the Plaintiffs became vested in certain land in Lawrence Township, Clearfield County, Pennsylvania, by virtue of the following deeds:

(a) The first parcel was acquired from Donald Bender and Darlene Bender by a Deed dated March 12, 1987, and recorded in Clearfield County Deeds and Records Book Volume 1143, page 582, and is more fully described as follows:

ALL that certain parcel or lot of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot No. 48 and being part of Clearfield County Assessment No. 123-K08-243-35, now No. 123-K08-243-35.2, and also being one of the lots conveyed by the Clearfield County Commissioners to the said Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14, 1970, as the property of the D. R. Woolridge Estate. This lot is bounded as follows:

On the North by land of Plaintiffs,
On the East by Bradford Street
On the South by other lots of Donald Bender and Darlene Bender,
And on the West by an unnamed alley.

(b) The second parcel consisting of two (2) lots also acquired from Donald Bender and Darlene Bender by their Deed dated November 2, 1999, and recorded in Clearfield County as Instrument No. 199918262, and more fully described as follows:

ALL those certain parcels or lots of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot Nos 49 and 50 and being identified as Clearfield County Assessment No. 123-K8-243-35 and also being the lots conveyed by the Clearfield County Commissioners to Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14,

1970, as the property of the D. R. Woolridge Estate. These lots are bounded as follows:

On the North by land of Plaintiffs,
On the East by Bradford Street,
On the South by Reighard Street, and
On the West by an unnamed alley.

4. The said three (3) lots identified as Lot Nos.48, 49 and 50 formerly assessed in the name of the D. R. Woolridge Estate as set forth in Paragraph 3 above, were conveyed to Donald Bender and Darlene Bender by Deed of the Clearfield County Commissioners dated July 31, 1970, recorded in Clearfield County Deed Book Volume 566, page 539.

5. The same said three (3) lots had been conveyed to the Clearfield County Commissioners by Lillian D. Eshelman, Treasurer of Clearfield County by Deed dated January 10, 1963, as the property of the D. R. Woolridge Estate for nonpayment of taxes for the year 1960.

6. The said D. R. Woolridge, also known as David R. Woolridge, had acquired four (4) pieces of land, one of which contained the lots described in Paragraph 3 above, by Deed of J. E. Wrigley dated June 18, 1904, and recorded in Clearfield County Deed Book 141, page 529.

7. The said D. R. Woolridge, also known as David R. Woolridge, died testate on June 3, 1950, and by his will filed in the Clearfield County Register of Wills' Office

at No. 20823 devised all of his real property to his wife, Dora M. Woolridge, and his sons, John Hayes Woolridge, Sr. and Raymond H. Woolridge.

8. The said Dora M. Woolridge died intestate without an estate being opened but was survived by her sons, John Hayes Woolridge, Sr., and Raymond H. Woolridge, as her sole intestate heirs..

9. The said Raymond H. Woolridge is an adult individual and has been named as a Defendant herein.

10. The said John Hayes Woolridge, Sr. died testate July 4, 1958, and by his will filed in the Clearfield County Register of Wills' Office at No. 23491, devised all of his real property to his widow, Elizabeth M. Woolridge, and his children, John Hayes Woolridge, Jr. and Elizabeth Woolridge Lee.

11. The said Elizabeth M. Woolridge died testate January 6, 1975, and by her will filed in the Clearfield County Register of Wills Office in Will Book 27, Page 159, at Estate No. 75-2, devised all of her real property to her children, John Hayes Woolridge, Jr., and Elizabeth Woolridge Lee.

12. The said John Hayes Woolridge, Jr., died August 4, 1983, survived by his four (4) daughters; namely, Nancy Virginia Woolridge; Elizabeth Jane Kauffman; Stephanie Ann Woolridge and Catherine Suzanne Lansberry, all of whom survived and are named as Defendants herein.

13. The said Elizabeth W. Lee, died on June 16, 2004, survived by her four (4) children; namely, Anna-Vaughn Lee Kepner, Eugenia Mitchell Lee, Elizabeth Jane Lee, and Joseph J. Lee, Jr., all of whom survived and are named as Defendants herein.

14. That this Quiet Title Action is necessary to remove any cloud on Plaintiffs' title to the parcels described in Paragraph 3 (a) and (b) of this Complaint due to any irregularities in the chain of title because of incomplete estate records of deceased persons or lack of estates, possible adverse interests of unknown heirs, and the validity of the private tax sale.

15. That Plaintiffs believe and aver that the tax sale of July 14, 1970, to their predecessors in title, was valid and that all interest or claim of the Defendants was extinguished by that sale.

16. That from 1970 to the present, Plaintiffs and their predecessors in title, have exercised open, notorious and hostile possession and control over the parcels described in Paragraph 3 (a) and (b) to the exclusion of all others.

17. That at no time have any of the herein named Defendants, or anyone purporting to act on their behalf, attempted to secure possession of the said premises, contest the title of the Plaintiffs or their predecessors in title or assist in the maintenance, repair or improvement of the premises hereinbefore described, nor have they asserted any interest adverse to the Plaintiffs by any legal action.

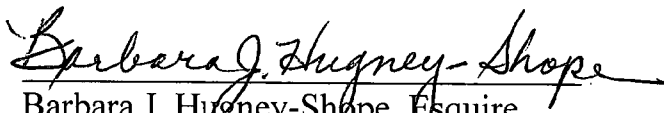
WHEREFORE, Plaintiffs request:

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

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

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

Respectfully submitted,


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiffs

VERIFICATION

We verify that the statements made in the foregoing Complaint in Quiet Title Action are true and correct. We understand that false statements herein are made subject to the penalties of 18 PA C.S. section 4904 relating to unsworn falsifications to authorities.

3/29/07
Date

Ronald L. Turner
RONALD L. TURNER

3/29/07
Date

Judith A. Turner
JUDITH A. TURNER

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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NO. 07-982-CD

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

* **Type of Pleading: AFFIDAVIT OF SERVICE**

* **Filed on behalf of: PLAINTIFFS**

* **Counsel of record for Plaintiff:**

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

* Supreme Court I. D. No. 26274
* 28478 Frenchville-Karthaus Hwy.
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*

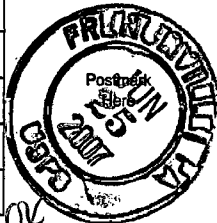
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JUL 2 2007

William A. Shaw
Prothonotary/Clerk of Courts

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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\$	1.14										
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Total Postage & Fees	\$ 10.04										
											
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PS Form 3800, June 2002 See Reverse for Instructions											

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PS Form 3811, February 2004

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
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NO. 07-982-CD

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* **Type of Pleading: AFFIDAVIT OF SERVICE**

* **Filed on behalf of: PLAINTIFFS**

* **Counsel of record for Plaintiff:**

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William A. Shaw
Prothonotary/Clerk of Courts

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City, State, ZIP+4: Williamsport MD 21795

PS Form 3800, June 2002 See Reverse for Instructions

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<p>2. Article Number (Transfer from service label)</p> <p>7006 0100 0003 4233 2663</p>	

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ATTORNEY AT LAW ESQUIRE**

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(814) 263-7357

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WAS
William A. Shaw
Prothonotary/Clerk of Courts

Michelle O'Day-Manning
Notary Public of PENNSYLVANIA
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Michelle O'Day-Manning, Notary Public
Clearfield Boro, Clearfield County
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Raymond Woolridge
1301 Doris St.
Kannapolis NC
28083-2986

2. Article Number (Transfer from service label)
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A. Signature
 X Seely R. Woolridge ☐ Agent ☐ Addressee

B. Received by (Printed Name)
R

C. Date of Delivery
4/27

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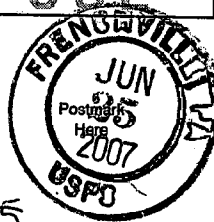
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William A. Shaw
Prothonotary/Clerk of Courts

Michelle O'Day-Manning
Notary Public
COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Michelle O'Day-Manning, Notary Public
Clearfield Boro, Clearfield County
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\$ 75.14						
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105.55 91.04						
Total Postage & Fees						
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PS Form 3800, June 2002 See Reverse for Instructions						



SENDER: COMPLETE THIS SECTION <ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	COMPLETE THIS SECTION ON DELIVERY A. Signature <i>x Eugenia M. Lee</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee B. Received by (Printed Name) C. Date of Delivery <i>6/29/07</i> D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below: <i>EUGENIA M. LEE</i>
1. Article Addressed to: <i>Eugenia Mitchell Lee</i> <i>10500 Weymouth St. Apt. 301</i> <i>Bethesda MD 20814</i>	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. 4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes
2. Article Number (Transfer from service label)	7006 0100 0003 4233 2632

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

**Type of Pleading: PRAECIPE TO
REINSTATE COMPLAINT**

Filed on behalf of: PLAINTIFFS
RONALD L. TURNER AND
JUDITH A. TURNER, husband and
Wife

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 *Atty pd. 7.00*
0/8:51/01
AUG 03 2007 *ccs 1 Compl.*
William A. Shaw *Reinstated to*
Prothonotary/Clerk of Courts *Atty*



SHERIFF OF DELAWARE COUNTY
MEDIA, PENNSYLVANIA, 19063

JOSEPH F. MCGINN
Sheriff

PHONE (610) 891-4296 FACSIMILE (610) 891-1765

WILLIAM C. KELLY
Chief Deputy

Invoice Number: SMITHJ-127311

Date Filed: Jun 25, 2007

Attorney: BARBARA SHOPE

Court Term & No.: OC07-982

Plaintiff: TURNER

Defendant: WOOLRIDGE/ LANSBERRY

Case Type: CIVIL -- Complaint

Comments:
CLEARFIELD CO

Special Instructions:

Check No./Cash: 6641

Account	Amount
County Account	\$37.50
Mileage	\$23.50
Affidavits Account	\$10.00
<hr/>	
Total	\$71.00



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

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

OFFICE (814) 765-2641 EXT. 51
FAX (814) 765-5911
ROBERT SNYDER
CHIEF DEPUTY
MARILYN HAMM
DEPT. CLERK
CYNTHIA AUGHENBAUGH
OFFICE MANAGER
KAREN BAUGHMAN
CLERK TYPIST
PETER F. SMITH
SOLICITOR

DEPUTATION

6/22/07 2 copies
1MH 127311 7:00 PM

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 102928

RONALD L. TURNER and JUDITH A. TURNER

TERM & NO. 07-982-CD

COMPLAINT ACTION TO QUIET TITLE

vs.

ESTATE OF D.R. WOOLRIDGE a/k/a DAVID R. WOOLRIDGE et al

SERVE BY: 07/22/07

HEARING:

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

SERVE: STEPHANIE ANN WOOLRIDGE

ADDRESS: 8 LISA WAY, WAYNE, PA 19087

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 DELAWARE COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, June 22, 2007.

RESPECTFULLY,

7/3/07

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

Sworn to and subscribed before me
this 28th day of June 2007.

Kathleen E. McCuen

NOTARIAL SEAL
KATHLEEN E. MCCUEN, Notary Public
Media Boro., Delaware County
My Commission Expires April 7, 2010

Manning Bayes - 4/24/07
Served Mother, Dahn & Wood Ridge. 1045 AM



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

McP 6-25-07

DEPUTATION

6/22/07
1M# 127311
7:00 PM

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 102928

RONALD L. TURNER and JUDITH A. TURNER

TERM & NO. 07-982-CD

vs.

COMPLAINT ACTION TO QUIET TITLE

ESTATE OF D.R. WOOLRIDGE a/k/a DAVID R. WOOLRIDGE et al

SERVE BY: 07/22/07

HEARING:

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

SERVE: CATHERINE SUZANNE LANSBERRY

ADDRESS: 430 KATHMERE AVENUE HAVERTOWN, PA 19803

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 DELAWARE COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, June 22, 2007.

RESPECTFULLY,

Sworn to and subscribed before me
this 28th day of June 2007.

Kathleen E. McCuen
COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
KATHLEEN E. MCCUEN, Notary Public
Media Boro., Delaware County
My Commission Expires April 7, 2010

Chester A. Hawkins

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

6/26/07 11:25 AM.
UNKNOWN: INT-REC.
FROM DETTY CARRETT,
DEPUTY

James M. Rutland
7/3/07

Barbara J. Hugney-Shope
ATTORNEY AT LAW

28478 Frenchville-Karthauss Hwy.
P.O. Box 232
Frenchville, PA 16836

814-263-7357

June 22, 2007

Ms. Catherine Suzanne Lansberry
430 Kathmere Avenue
Havertown, PA 19803

RE: Quiet Title Action
Ronald & Judith Turner vs. Estate of D. R. Woolridge

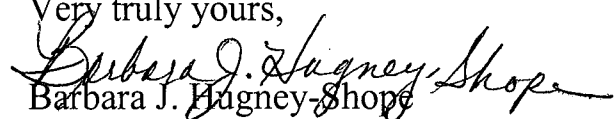
Dear Ms. Lansberry:

Enclosed herewith is a certified copy of a Complaint for the Quiet Title Action that I have filed on behalf of Mr. & Mrs. Ronald Turner, the present owners of property in Lawrence Township, Clearfield County, Pennsylvania, that was sold for unpaid real estate taxes in 1970 assessed as the property of the Estate of D. R. Woolridge.

The records available in Clearfield County indicate that you may be a heir of D. R. Woolridge, also known as David R. Woolridge, and as such you are required to be given notice of the filing of the enclosed complaint. If you have any questions on the enclosed complaint, 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 a response. If you do not do so, any rights that you might have may be lost and will be extinguished once a final Order of the Court is entered.

Obviously, there is no necessity for you to do anything if you do not intend to pursue any claim.

Very truly yours,


Barbara J. Hugney-Shope

BJHS
Enclosure

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

RONALD L. TURNER and
JUDITH A. TURNER, husband and wife,
Plaintiffs,

vs.

ESTATE OF D. R. WOOLRIDGE, a/k/a
DAVID R. WOOLRIDGE; RAYMOND H.
WOOLRIDGE; NANCY VIRGINIA
WOOLRIDGE; ELIZABETH JANE
KAUFFMAN; STEPHANIE ANN
WOOLRIDGE; CATHERINE SUZANNE
LANSBERRY; ANNA-VAUGHN LEE
KEPNER; EUGENIA MITCHELL LEE;
ELIZABETH JANE LEE; and JOSEPH J.
LEE, JR. 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. 07-982-CD
*
* Type of Case: QUIET TITLE ACTION
*
* Type of Pleading: COMPLAINT
*
* Filed on behalf of: PLAINTIFFS
* RONALD L. TURNER and
* JUDITH A. TURNER
*
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* Counsel of record for Plaintiffs:
*
* 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
*

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

JUN 22 2007

Attest.

William L. Shaw
Prothonotary/
Clerk of Courts

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

RONALD L. TURNER and
JUDITH A. TURNER, husband and wife,
Plaintiffs,

vs.

ESTATE OF D. R. WOOLRIDGE, a/k/a
DAVID R. WOOLRIDGE; RAYMOND H.
WOOLRIDGE; NANCY VIRGINIA
WOOLRIDGE; ELIZABETH JANE
KAUFFMAN; STEPHANIE ANN
WOOLRIDGE; CATHERINE SUZANNE
LANSBERRY; ANNA-VAUGHN LEE
KEPNER; EUGENIA MITCHELL LEE;
ELIZABETH JANE LEE; and JOSEPH J.
LEE, JR. 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

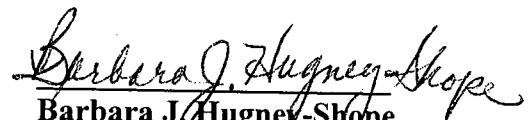
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* No. 07- -CD
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* ACTION TO QUIET TITLE
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NOTICE TO DEFEND

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 Plaintiffs. 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
Attorney for Plaintiffs

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

RONALD L. TURNER and
JUDITH A. TURNER,
husband and wife

Plaintiffs,

vs.

ESTATE OF D. R. WOOLRIDGE, a/k/a
DAVID R. WOOLRIDGE; RAYMOND H.
WOOLRIDGE; NANCY VIRGINIA
WOOLRIDGE; ELIZABETH JANE
KAUFFMAN; STEPHANIE ANN
WOOLRIDGE; CATHERINE SUZANNE
LANSBERRY; ANNA-VAUGHN LEE
KEPNER; EUGENIA MITCHELL LEE;
ELIZABETH JANE LEE; and JOSEPH J.
LEE, JR. 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- -CD
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* ACTION TO QUIET TITLE
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COMPLAINT

NOW COME, the Plaintiffs, RONALD L. TURNER and JUDITH A. TURNER,
who by and through their attorney, BARBARA J. HUGNEY-SHOPE, ESQUIRE, file
the following Complaint in Quiet Title against the Defendants, and aver as follows:

1. That the Plaintiffs, RONALD L. TURNER and JUDITH A. TURNER, are
husband and wife, and reside at 1467 River Road Rear, Olanta, Clearfield County,
Pennsylvania 16863.

2. That the Defendants, the heirs of the Estate of D. R. Woolridge, also known as David R. Woolridge, are as follows:

(a) Raymond H. Woolridge, an adult individual, whose last known address is 1301 Doris Street, Kannapolis, North Carolina 28083-2986;

(b) Nancy Virginia Woolridge, an adult individual, whose last known address is 100 North East 108th Street, Vancouver, Washington 98685-5262;

(c) Elizabeth Jane Kauffman, an adult individual, whose last known address is 450 del Moreno Drive, Woodland Hills, California 91364;

(d) Stephanie Ann Woolridge, an adult individual, whose last known address is 8 Lisa Way, Wayne, Pennsylvania 19087;

(e) Catherine Suzanne Lansberry, an adult individual, whose last known address is 430 Kathmere Avenue, Havertown, Pennsylvania 19003;

(f) Anna-Vaughn Lee Kepner, an adult individual, whose last known address is Bellwether Farm, 16452 Spielman Road, Williamsport, Maryland 21795;

(g) Eugenia Mitchell Lee, an adult individual, whose last known address is 10500 Weymouth Street, Apt 301, Bethesda, Maryland 20814;

(h) Elizabeth Jane Lee, an adult individual, whose last known address is 57 Lake Winds Road, Diamond Point, New York 12824; and

(i) Joseph J. Lee, Jr., an adult individual, whose last known address is 9 North Terrace Drive, Dillsburg, Pennsylvania 17019.

3. That the Plaintiffs became vested in certain land in Lawrence Township, Clearfield County, Pennsylvania, by virtue of the following deeds:

(a) The first parcel was acquired from Donald Bender and Darlene Bender by a Deed dated March 12, 1987, and recorded in Clearfield County Deeds and Records Book Volume 1143, page 582, and is more fully described as follows:

ALL that certain parcel or lot of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot No. 48 and being part of Clearfield County Assessment No. 123-K08-243-35, now No. 123-K08-243-35.2, and also being one of the lots conveyed by the Clearfield County Commissioners to the said Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14, 1970, as the property of the D. R. Woolridge Estate. This lot is bounded as follows:

On the North by land of Plaintiffs,
On the East by Bradford Street
On the South by other lots of Donald Bender and Darlene Bender,
And on the West by an unnamed alley.

(b) The second parcel consisting of two (2) lots also acquired from Donald Bender and Darlene Bender by their Deed dated November 2, 1999, and recorded in Clearfield County as Instrument No. 199918262, and more fully described as follows:

ALL those certain parcels or lots of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot Nos 49 and 50 and being identified as Clearfield County Assessment No. 123-K8-243-35 and also being the lots conveyed by the Clearfield County Commissioners to Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14,

1970, as the property of the D. R. Woolridge Estate. These lots are bounded as follows:

On the North by land of Plaintiffs,
On the East by Bradford Street,
On the South by Reighard Street, and
On the West by an unnamed alley.

4. The said three (3) lots identified as Lot Nos. 48, 49 and 50 formerly assessed in the name of the D. R. Woolridge Estate as set forth in Paragraph 3 above, were conveyed to Donald Bender and Darlene Bender by Deed of the Clearfield County Commissioners dated July 31, 1970, recorded in Clearfield County Deed Book Volume 566, page 539.

5. The same said three (3) lots had been conveyed to the Clearfield County Commissioners by Lillian D. Eshelman, Treasurer of Clearfield County by Deed dated January 10, 1963, as the property of the D. R. Woolridge Estate for nonpayment of taxes for the year 1960.

6. The said D. R. Woolridge, also known as David R. Woolridge, had acquired four (4) pieces of land, one of which contained the lots described in Paragraph 3 above, by Deed of J. E. Wrigley dated June 18, 1904, and recorded in Clearfield County Deed Book 141, page 529.

7. The said D. R. Woolridge, also known as David R. Woolridge, died testate on June 3, 1950, and by his will filed in the Clearfield County Register of Wills' Office

at No. 20823 devised all of his real property to his wife, Dora M. Woolridge, and his sons, John Hayes Woolridge, Sr. and Raymond H. Woolridge.

8. The said Dora M. Woolridge died intestate without an estate being opened but was survived by her sons, John Hayes Woolridge, Sr., and Raymond H. Woolridge, as her sole intestate heirs..

9. The said Raymond H. Woolridge is an adult individual and has been named as a Defendant herein.

10. The said John Hayes Woolridge, Sr. died testate July 4, 1958, and by his will filed in the Clearfield County Register of Wills' Office at No. 23491, devised all of his real property to his widow, Elizabeth M. Woolridge, and his children, John Hayes Woolridge, Jr. and Elizabeth Woolridge Lee.

11. The said Elizabeth M. Woolridge died testate January 6, 1975, and by her will filed in the Clearfield County Register of Wills Office in Will Book 27, Page 159, at Estate No. 75-2, devised all of her real property to her children, John Hayes Woolridge, Jr., and Elizabeth Woolridge Lee.

12. The said John Hayes Woolridge, Jr., died August 4, 1983, survived by his four (4) daughters; namely, Nancy Virginia Woolridge; Elizabeth Jane Kauffman; Stephanie Ann Woolridge and Catherine Suzanne Lansberry, all of whom survived and are named as Defendants herein.

13. The said Elizabeth W. Lee, died on June 16, 2004, survived by her four (4) children; namely, Anna-Vaughn Lee Kepner, Eugenia Mitchell Lee, Elizabeth Jane Lee, and Joseph J. Lee, Jr., all of whom survived and are named as Defendants herein.

14. That this Quiet Title Action is necessary to remove any cloud on Plaintiffs' title to the parcels described in Paragraph 3 (a) and (b) of this Complaint due to any irregularities in the chain of title because of incomplete estate records of deceased persons or lack of estates, possible adverse interests of unknown heirs, and the validity of the private tax sale.

15. That Plaintiffs believe and aver that the tax sale of July 14, 1970, to their predecessors in title, was valid and that all interest or claim of the Defendants was extinguished by that sale.

16. That from 1970 to the present, Plaintiffs and their predecessors in title, have exercised open, notorious and hostile possession and control over the parcels described in Paragraph 3 (a) and (b) to the exclusion of all others.

17. That at no time have any of the herein named Defendants, or anyone purporting to act on their behalf, attempted to secure possession of the said premises, contest the title of the Plaintiffs or their predecessors in title or assist in the maintenance, repair or improvement of the premises hereinbefore described, nor have they asserted any interest adverse to the Plaintiffs by any legal action.

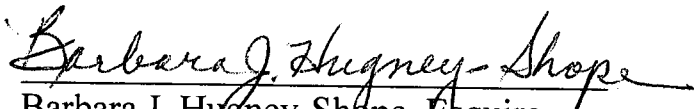
WHEREFORE, Plaintiffs request:

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

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

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

Respectfully submitted,


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiffs

VERIFICATION

We verify that the statements made in the foregoing Complaint in Quiet Title Action are true and correct. We understand that false statements herein are made subject to the penalties of 18 PA C.S. section 4904 relating to unsworn falsifications to authorities.

3/29/07
Date

Ronald L. Turner
RONALD L. TURNER

3/29/07
Date

Judith A. Turner
JUDITH A. TURNER

4


COUNTY OF YORK
OFFICE OF THE SHERIFF

45 N. GEORGE ST., YORK, PA 17401

SERVICE CALL
(717) 771-9601

SHERIFF SERVICE
PROCESS RECEIPT and AFFIDAVIT OF RETURN

INSTRUCTIONS
PLEASE TYPE ONLY LINE 1 THRU 12
DO NOT DETACH ANY COPIES

1. PLAINTIFF/S/ <u>Ronald L. Turner a/</u>		2. COURT NUMBER <u>07-982-CD</u>
3. DEFENDANT/S/ <u>Estate of D.R. Woodridge etal</u>		4. TYPE OF WRIT OR COMPLAINT <u>Complaint Action to Quiet Title</u> CTOT & NOTICE
SERVE  AT	5. NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO BE LEVIED, ATTACHED, OR SOLD <u>Joseph J. Lee Jr.</u>	
	6. ADDRESS (STREET OR RFO WITH BOX NUMBER, APT. NO., CITY, BORO, TWP., STATE AND ZIP CODE) <u>9 North Terrace Drive, Dillsburg PA 17019</u>	
7. INDICATE SERVICE: <input type="checkbox"/> PERSONAL <input type="checkbox"/> PERSON IN CHARGE <input checked="" type="checkbox"/> DEPUTIZE <input type="checkbox"/> CERT. MAIL <input type="checkbox"/> 1ST CLASS MAIL <input type="checkbox"/> POSTED <input type="checkbox"/> OTHER		
NOW <u>June 22</u> , 20 <u>07</u> I, SHERIFF OF <u>YORK</u> COUNTY, PA, do hereby deputize the sheriff of <u>YORK</u> COUNTY to execute this Writ and make return thereof according to law. This deputization being made at the request and risk of the plaintiff.		
8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE: <div style="text-align: right;">OUT OF COUNTY CLEARFIELD</div>		

ADVANCE FEE PAID BY ATTY.

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 property before sheriff's sale thereof.

9. TYPE NAME and ADDRESS of ATTORNEY / ORIGINATOR and SIGNATURE <u>BARBARA J. HUGNEY-SHOPE</u> <u>23 NORTH SECOND STREET, CLEARFIELD, PA 16830</u>	10. TELEPHONE NUMBER <u>814-263-7357</u>	11. DATE FILED <u>6/22/2007</u>
12. SEND NOTICE OF SERVICE COPY TO NAME AND ADDRESS BELOW: (This area must be completed if notice is to be mailed). <div style="text-align: center;">CLEARFIELD CO SHERIFF</div>		

SPACE BELOW FOR USE OF THE SHERIFF - DO NOT WRITE BELOW THIS LINE

13. I acknowledge receipt of the writ or complaint as indicated above. <u>MJ MCGILL YCSO</u>												14. DATE RECEIVED <u>6/25/2007</u>				15. Expiration/Hearing Date <u>7/22/2007</u>							
16. HOW SERVED: PERSONAL (<input checked="" type="checkbox"/>) RESIDENCE (<input checked="" type="checkbox"/>) POSTED () POE () SHERIFF'S OFFICE () OTHER () SEE REMARKS BELOW																							
17. <input type="checkbox"/> I hereby certify and return a NOT FOUND because I am unable to locate the individual, company, etc. named above. (See remarks below.)																							
18. NAME AND TITLE OF INDIVIDUAL SERVED / LIST ADDRESS HERE IF NOT SHOWN ABOVE (Relationship to Defendant) <u>Joseph J. Lee Jr.</u>												19. Date of Service <u>6-27-07</u>				20. Time of Service <u>6:50 PM</u>							
21. ATTEMPTS																							
22. REMARKS:																							

23. Advance Costs <u>\$100.00</u>	24. Service Costs <u>18.00</u>	25. N/F	26. Mileage <u>21.83</u>	27. Postage	28. Sub Total <u>39.83</u>	29. Pound	30. Notary <u>5.00</u>	31. Surchg.	32. Tot. Costs <u>44.83</u>	33. Costs Due or Refund <u>55.17</u>	Check No. <u>17189</u>								
34. Foreign County Costs		35. Advance Costs	36. Service Costs	37. Notary Cert.	38. Mileage/Postage/Not Found	39. Total Costs		40. Costs Due or Refund											
41. AFFIRMED and Subscribed to before me this <u>28TH</u> day of <u>JUNE</u> , 20 <u>07</u> at <u>106 E. 2nd St York, PA</u> LISA L. BOWMAN, NOTARY PUBLIC CITY OF YORK, YORK COUNTY MY COMMISSION EXPIRES AUG. 12, 2009												42. day of							
43. Signature of Dep. Sheriff <u>John Malachuk</u>												44. Signature of York County Sheriff <u>William M. Hose, Sheriff</u>				45. DATE <u>6-27-07</u>			
46. Signature of Foreign County Sheriff												47. DATE <u>6/28/07</u>							
48. Signature of Foreign County Sheriff												49. DATE							
50. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED ISSUING AUTHORITY AND TITLE										51. DATE RECEIVED									

RECEIVED
OFFICE OF THE SHERIFF

2007 JUN 25 PM 2:13

YORK PA



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 102928

TERM & NO. 07-982-CD

RONALD L. TURNER and JUDITH A. TURNER

COMPLAINT ACTION TO QUIET TITLE

vs.

ESTATE OF D.R. WOOLRIDGE a/k/a DAVID R. WOOLRIDGE et al

SERVE BY: 07/22/07

HEARING:

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

SERVE: JOSEPH J. LEE, JR.

ADDRESS: 9 NORTH TERRACE DRIVE, DILLSBURG, PA 17019

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 YORK COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, June 22, 2007.

RESPECTFULLY,

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

RECEIVED
OFFICE OF THE SHERIFF
2007 JUN 25 PM 2 13
YORK PA

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

**Type of Pleading: CERTIFICATE
OF SERVICE**

Filed on behalf of: PLAINTIFFS
RONALD L. TURNER AND
JUDITH A. TURNER, husband and
Wife

Counsel of record for Plaintiff:

BARBARA J. HUGNEY-SHOPE
ATTORNEY AT LAW

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

FILED

OCT 03 2007

William A. Shaw
Prothonotary/Clerk of Courts

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

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 copy of the attached
NOTICE OF INTENTION TO FILE PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT, on
September 13, 2007, by United States Postal Service, regular mail, upon the following Defendants:

**Elizabeth Jane Lee
57 Lake Winds Road
Diamond Point, NY 12824**

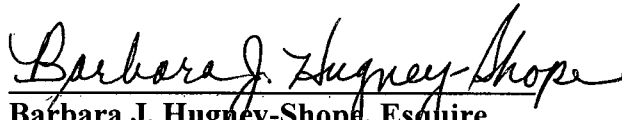
**Anna Vaughn Lee Kepner
16452 Spielman Road
Williamsport, MD 21795**

**Eugenia Michelle Lee
10500 Weymouth St.
Apt. 301
Bethesda, MD 20814**

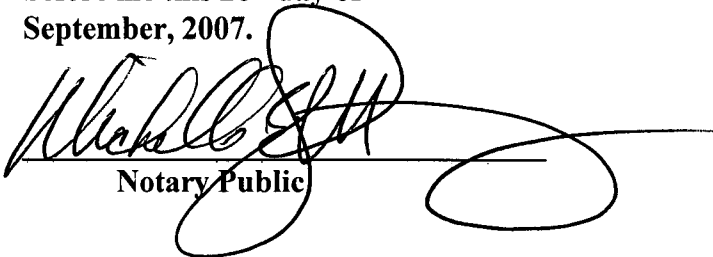
Raymond Woolridge
1301 Doris St.
Kannapolis, NC 28083-2986

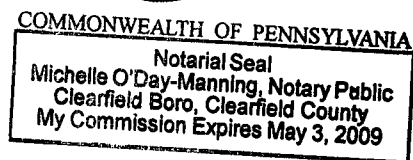
Joseph J. Lee, Jr.
9 N. Terrace Dr.
Dillsburg, PA 17019

Stephanie Ann Woolridge
8 Lisa Way
Wayne, PA 19087


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiff

SWORN to and subscribed
before me this 26th day of
September, 2007.


Notary Public



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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

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

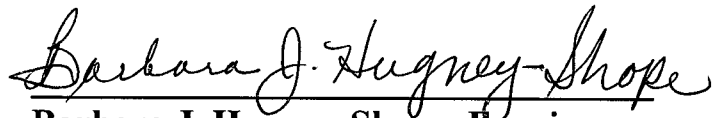
DATE OF NOTICE: September 13, 2007

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**

A handwritten signature in cursive script that reads "Barbara J. Hugney-Shope". The signature is written in dark ink and is positioned above the printed name and address.

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

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

Type of Pleading: AFFIDAVIT

Filed on behalf of: PLAINTIFFS
RONALD L. TURNER AND
JUDITH A. TURNER, husband and
Wife

Counsel of record for Plaintiff:

BARBARA J. HUGNEY-SHOPE
ATTORNEY AT LAW

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

FILED

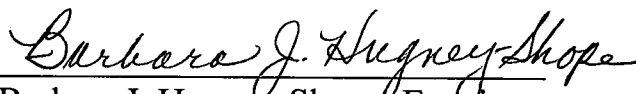
OCT 05 2007

William A. Shaw
Prothonotary/Clerk of Courts

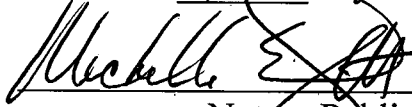
ICC TO ATTY

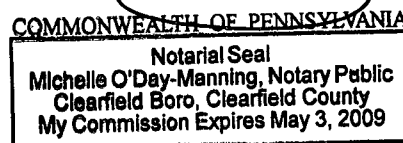
BARBARA J. HUGNEY-SHOPE, ESQUIRE, being duly sworn according to law, deposes and says that she is the attorney for the Plaintiffs in the above-captioned action and makes this affidavit on behalf of Plaintiffs, being authorized to do so; that a Complaint in Action to Quiet Title, endorsed with a Notice to Defend within twenty (20) days from service thereof was served on the

Defendants, ANNA VAUGHN LEE KEPNER, EUGENIA MITCHELL LEE, RAYMOND WOOLRIDGE, ELIZABETH JANE LEE, by USPS, 1st class mail, certified mail, return receipt requested. 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, STEPHANIE ANN WOOLRDIGE, JOSEPH J. LEE, JR, by having the Sheriff of Clearfield County serve. A Complaint in Action to Quiet Title, endorsed with a Notice to Defend within twenty (20) days from service thereof was attempted on Defendants, ELIZABETH JANE KAUFFMAN, CATHERINE SUZANNE LANSBERRY, NANCY VIRGINIA WOOLRIDGE, and in which they returned as "not found" as filed in said case and by publication in The Progress of Clearfield, Pennsylvania, on August 17, 2007, proof of which is attached hereto marked Exhibit "A," and the Clearfield County Legal Journal during the week of August 31, 2007, proof of which is attached hereto, marked Exhibit "B," and these Defendants have not filed an Answer thereto although the time in which to do so has expired.


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiffs

SWORN to and subscribed before me this 4th day of October, 2007.


Notary Public



IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION-LAW
NO. 07-982-CD

RONALD L. TURNER and
JUDITH A. TURNER,
husband and wife,
Plaintiffs
vs.

ESTATE OF D. R. WOOLRIDGE,
a/k/a DAVID R. WOOLRIDGE;
RAYMOND H. WOOLRIDGE;
NANCY VIRGINIA WOOLRIDGE;
ELIZABETH JANE KAUFFMAN;
STEPHANIE ANN WOOLRIDGE;
CATHERINE
SUZANNE LANSBERRY;
ANNA-VAUGHN LEE KEPLER;
EUGENIA MITCHELL LEE;
and JOSEPH J. LEE, JR.,
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

ACTION TO
QUIET TITLE
NOTICE

TO THE FOLLOWING DEFEN-
DANTS AND THEIR HEIRS, SUC-
CESSORS AND ASSIGNS: NANCY
VIRGINIA WOOLRIDGE; ELIZA-
BETH JANE KAUFFMAN; CATH-
ERINE SUZANNE LANSBERRY
TAKE NOTICE that at No.
07-982-CD in the Court of Com-
mon Pleas of Clearfield County,
Pennsylvania, Plaintiffs, Ronald L.
Turner and Judith A. Turner, hus-
band and wife, filed this Complaint
against you, your heirs, executors,

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

On this 24th day of August, A.D. 2007,
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 17, 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.
COMMONWEALTH OF PENNSYLVANIA
My Commission Expires
October 31, 2007

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 :

:

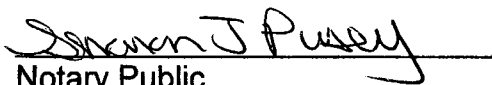
COUNTY OF CLEARFIELD :

On this 31st 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 31, 2007, Vol. 19, No. 35. And that all of the allegations of this statement as to the time, place, and character of the publication are true.



Gary A. Knaresboro, Esquire
Editor

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



Notary Public
My Commission Expires

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

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

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION - LAW
No. 07-982 -CD

RONALD L. TURNER and JUDITH A. TURNER, husband and wife, Plaintiffs vs. ESTATE OF D. R. WOOLRIDGE, a/k/a DAVID R. WOOLRIDGE; RAYMOND H. WOOLRIDGE; NANCY VIRGINIA WOOLRIDGE; ELIZABETH JANE KAUFFMAN; STEPHANIE ANN WOOLRIDGE; CATHERINE SUZANNE LANSBERRY; ANNA-VAUGHN LEE KEPNER; EUGENIA MITCHELL LEE; and JOSEPH J. LEE, JR., 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

ACTION TO QUIET TITLE NOTICE
TO THE FOLLOWING DEFENDANTS
AND THEIR HEIRS, SUCCESSORS AND
ASSIGNS: NANCY VIRGINIA WOOLRIDGE; ELIZABETH JANE KAUFFMAN; CATHERINE SUZANNE LANSBERRY

TAKE NOTICE that at No. 07-982-CD, in the Court of Common Pleas of Clearfield County, Pennsylvania, Plaintiffs, Ronald L. Turner and Judith A. Turner, husband and wife, 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 the Plaintiffs are the owners of

PARCEL NO. 1: ALL that certain parcel or lot of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot No. 48 and being part of Clearfield County Assessment No. 123-K08-243-35, now No. 123-K08-243-35.2, and also being one of the lots conveyed by the Clearfield County Commissioners to Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14, 1970, as the property of D. R. Woolridge Estate. This lot is bounded as follows: On the North by land of Plaintiffs; On the East by Bradford Street; On the South by other lots of Donald Bender and Darlene Bender; and on the West by an unnamed alley.

BEING the same premises conveyed to Plaintiffs by a Deed dated March 12, 1987, and recorded in Clearfield County Deed Book Volume 1143, page 582.

PARCEL NO. 2: ALL that certain parcel or lot of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot Nos 49 and 50 and being identified as Clearfield County Assessment No. 123-K8-243-35 and also being the lots conveyed by

the Clearfield County Commissioners to Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14, 1970, as the property of D. R. Woolridge Estate. These lots are bounded as follows: On the North by land of Plaintiffs; On the East by Bradford Street; On the South by Reighard Street, and On the West by an unnamed alley.

BEING the same two (2) lots conveyed to Plaintiffs by Deed dated November 2, 1999, and recorded in Clearfield County as Instrument No. 199918262

The Plaintiffs claim absolute ownership of the above-described lots; that the Plaintiffs have instituted suit in order to have their 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 Plaintiffs as set forth in their Complaint.

YOU ARE NOTIFIED TO APPEAR AND ANSWER THE SAID COMPLAINT IN 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-Shope, Esquire, 28478 Frenchville-Karthauss Hwy. (P.O. Box 232), Frenchville, Pennsylvania 16836; (814) 263-7357, Attorney for Plaintiffs.

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

Type of Pleading: MOTION FOR JUDGMENT

Filed on behalf of: PLAINTIFFS
RONALD L. TURNER AND
JUDITH A. TURNER, husband and
Wife

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

0 11:43 am 6K

OCT 05 2007

William A. Shaw
Prothonotary/Clerk of Courts

1cc to Atty
(6K)

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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 *

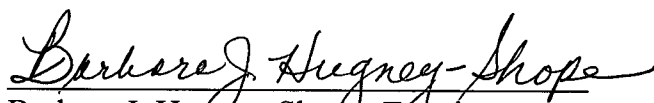
NO. 07-982-CD

Type of Case: QUIET TITLE ACTION

MOTION FOR JUDGMENT

NOW, this 4th day of October, 2007, Affidavits having been filed by the Plaintiff, Ronald L. Turner and Judith A. Turner, through their attorney, Barbara J. Hugney-Shope, Esquire, that the Complaint with Notice to Defend was served on the Defendants, Raymond H. Woodlridge; Anna Vaughn Lee Kepner; Eugenia Mitchell Lee; and, Elizabeth Jane Lee by depositing the same with the U. S. Postal Service, postage prepaid, certified mail, return receipt requested. A Complaint with Notice to Defend was served on the Defendants, Stephanie Ann Woolridge and Joseph J. Lee, Jr. by service through the Clearfield County Sheriff's Office. A Notice of Intention to take Default Judgment was served on above Defendants on September 13, 2007, by USPS, 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, Nancy Virginia Woolridge, Elizabeth Jane Kauffman, and Catherine Suzanne Lansberry by publication on August 17, 2007, in The Clearfield Progress, and on August 31, 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 to the Defendants whose whereabouts are known and more than twenty (20) days since publication to the Defendants whose whereabouts are unknown has elapsed. 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 Plaintiffs set forth in their Complaint.



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

MA

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

**Type of Pleading: ORDER
OF COURT**

Filed on behalf of: PLAINTIFFS
RONALD L. TURNER AND
JUDITH A. TURNER, husband and
Wife

Counsel of record for Plaintiff:

BARBARA J. HUGNEY-SHOPE
ATTORNEY AT LAW

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

FILED 3cc
0110:46/51 Atty Shope
OCT 09 2007

William A. Shaw
Prothonotary/Clerk of Courts

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

Type of Case: QUIET TITLE ACTION

ORDER OF COURT

AND NOW, this 8th day of Oct, 2007, an Affidavit having been made that service was made through the Clearfield County's Sheriff Office on Stephanie Ann Woolridge, Joseph J. Lee, Jr., and through the U. S. Postal Service, postage prepaid, certified mail, return receipt requested, on Anna Vaughn Lee Kepner, Eugenia Mitchell Lee, Raymond Woolridge, Elizabeth Jane Lee, 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 Elizabeth Jane Kauffman, Catherine Suzanne

Lansberry, Nancy Virginia Woolridge, 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 Praecipe by Plaintiff, which hereby Orders and Decrees that title to the land subject of this action is vested absolutely in the Plaintiff, his heirs and assigns, free and clear of any and all claims of any nature by 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 Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

ALL that certain parcel or lot of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot No. 48 and being part of Clearfield County Assessment No. 123-K08-243-35, now No. 123-K08-243-35.2, and also being one of the lots conveyed by the Clearfield County Commissioners to the said Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14, 1970, as the property of D. R. Woolridge Estate. This lot is bounded as follows:

On the North by land of Plaintiffs,
On the East by Bradford Street
On the South by other lots of Donald Bender and Darlene Bender,

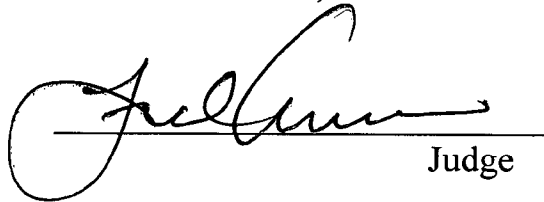
And on the West by an unnamed alley.

AND

ALL that certain parcel or lot of land situate in Lawrence Township, Clearfield County, Pennsylvania, known as Lot Nos 49 and 50 and being identified as Clearfield County Assessment No. 123-K8-243-35 and also being the lots conveyed by the Clearfield County Commissioners to Donald Bender and Darlene Bender at a private sale ordered by the Court of Common Pleas of Clearfield County on July 14, 1970, as the property of D. R. Woolridge Estate. These lots are bounded as follows:

On the North by land of Plaintiffs,
On the East by Bradford Street,
On the South by Reighard Street, and
On the West by an unnamed alley.

BY THE COURT,



Judge

FILED

OCT 09 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 10/9/07

☒ 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:

William A. Shaw
Prothonotary/Clerk of Courts

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

RONALD L. TURNER and JUDITH A. TURNER, *
husband and wife, *
Plaintiffs *

vs. *

ESTATE OF D. R. WOOLRIDGE, a/k/a *
DAVID R. WOOLRIDGE; RAYMOND H. *
WOOLRIDGE; NANCY VIRGINIA *
WOOLRIDGE; ELIZABETH JANE KAUFFMAN; *
STEPHANIE ANN WOOLRIDGE; CATHERINE *
SUZANNE LANSBERRY; ANNA-VAUGHN *
LEE KEPNER; EUGENIA MITCHELL LEE; *
ELIZABETH JANE LEE and JOSEPH J. LEE, JR., *
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. 07-982-CD

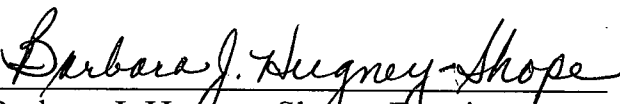
Type of Case: QUIET TITLE ACTION

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 October 8, 2007.

Respectfully submitted,


Barbara J. Hugney-Shope, Esquire
Attorney for Plaintiffs