

08-485-CD

P. Grumming vs J. Bruce Meyer et al

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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\* No. 08 - 485 - CD

\* QUIET TITLE ACTION

FILED,

MAR 18 2008  
11:55 AM  
William A. Shaw  
Prothonotary/Clerk of Courts  
4 cent to Army

\* Type of Pleading:

\* COMPLAINT

\* Filed on behalf of:  
\* Plaintiffs

\* Counsel of Record for  
\* this party:

\* Linda C. Lewis, Esq.  
\* Pa I.D. 80478

\* Naddeo & Lewis, LLC  
\* P.O. Box 552  
\* Clearfield, PA 16830  
\* (814) 765-1601

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NOTICE

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 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  
Market and Second Streets  
Clearfield, PA 16830  
(814) 765-2641, ext. 5982

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
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COMPLAINT

NOW COME the Plaintiffs, Robert Grimminger and Emily M. Grimminger, and by their attorney, James A. Naddeo, Esquire, sets forth the following:

COUNT I

Robert Grimminger and Emily M. Grimminger v.  
J. Bruce Meyer and Mary Meyer

1. That the Plaintiffs are Robert Grimminger and Emily M. Grimminger, husband and wife, who reside at 604 Ogden Avenue, Clearfield, Pennsylvania.

2. That the Defendants are J. Bruce Meyer and Mary Meyer, husband and wife, whose last known address was Clearfield, Pennsylvania.

3. That the Plaintiffs are the owners of certain property situate in Pike Township, Clearfield County, Pennsylvania, more particularly bounded and described as follows:

BEGINNING at a Lynn on line of John Ownes; thence South 1½ degrees East 57.6 perches by lands of John Owens to a post; thence by land of William Cathcart, north 89½ degrees west 81 perches to a post; thence by land of Alfred A. Long, north 3½ degrees West 57.6 perches to a post; thence by land of John Ownes, south 89½ degrees East 76 perches to Lynn and place of beginning. Containing 26 acres 112 perches and allowance of 6% for roads and the like.

EXCEPTING and RESERVING the buildings now located upon the above described lands, and three (3) acres of surface the center of which three acre piece shall be the dwelling house now occupied by Walter Olosky and Helen Olosky.

4. That the premises were conveyed to Frank Brinton and Robert Grimminger by Deed of the Clearfield County Commissioners dated December 1, 1964 and recorded in Clearfield County Deed Book 760, page 384.

5. That Frank Brinton conveyed his one-half interest in the premises to his daughter, Emily M. Grimminger, by Deed dated January 18, 1993 and recorded in Clearfield County Deed and Record Book 1510, page 103.

6. That the property was conveyed to J. Bruce Meyer and Mary Meyer by Deed of Walter Olosky and Helen Olsoky by deed dated October 22, 1945 and recorded in Clearfield County Deed Book 370, page 503.

7. That Robert J. Smith, Treasurer of Clearfield County, at tax sale, conveyed the subject property in the name of Bruce Meyer to the Clearfield County Commissioners by deed dated April 24, 1950 and recorded in Clearfield County Deed Book 760, page 382.

8. That the Clearfield County Commissioners conveyed title to the subject property to Frank Brinton and Robert Grimminger by Deed dated December 1, 1964 and recorded in Clearfield County Deed Book 760 page 384. A copy of the chain of title is attached hereto as Exhibit "A".

9. That the purpose of this quiet title action is to extinguish and cure any defects which may exist in the tax sale more fully described in Paragraphs 7 and 8 of this complaint and to cure any equity or redemption the said J. Bruce Meyer and Mary Meyer, their heirs, executors, administrators and assigns may have in said property.

10. That the Plaintiffs and the Defendants are the only persons who have an interest in the subject property.

WHEREFORE, Plaintiffs request:

(a) That by decree of your Honorable Court it may be declared that title to the premises set forth in Paragraph 3 is in the Plaintiffs and that they shall be allowed to enjoy said property in peace; and

(b) That the Defendants within twenty (20) days from the receipt of the Complaint, institute an action of ejectment against the Plaintiffs and that otherwise the Defendants be perpetually enjoined from setting up any title to said property; from impeaching, denying or in any way attacking the Plaintiffs' title to said property, from issuing or maintaining an ejectment of said premises or any part thereof.

COUNT II

Robert Grimminger and Emily M. Grimminger v.  
Dollie Beckman, et al

11. That the Plaintiffs incorporate Paragraphs 1 through 5 of the First Count of this Complaint by reference and makes them a part hereof.

12. That the Defendant, Oscar A. Beckman, died August 22, 1975 leaving as his heirs the following individuals: Dollie C. Beckman, widow, Ruth Rollin, daughter, Caroline Smith, daughter and Frederick Beckman, son.

13. That the Defendant, Dollie C. Beckman, is an adult individual, who resides at 9351 Curwensville Tyrone Highway, Olanta, PA, 16863.

14. That the Defendant, Frederick Beckman, is an adult individual whose address is PO Box 46, Olanta, PA, 16403.

15. That the Defendant, Caroline Smith, is an adult individual who resides at 903 Olanta Road, Olanta, PA, 16863.

16. That the Defendant, Ruth Rollin, is an adult individual, who resides at 145 Center Street, Cambridge Springs PA, 16403.

17. That the Plaintiffs are currently in possession of the property more fully described in Paragraph 3 hereof.

18. That by Deed dated July 28, 1949 and recorded in Clearfield County Deed Book 699, page 321, J. Bruce Meyer and Mary Meyer conveyed the property more fully described in Paragraph 3 hereof to the Defendant, Oscar A. Beckman. A copy of the chain of title is attached hereto as Exhibit "B".

19. That the Defendant, Oscar A. Beckman, did not record his deed to the subject property until April 25, 1975.

20. That the subject property was sold at tax sale on November 2, 1949 in the name of Bruce Meyer for unpaid taxes for the year 1947.

21. That Defendant has no valid legal right to possession of the premises.

22. That Plaintiff claims the right to possession of the premises to the exclusion of the Defendant.

WHEREFORE, Plaintiffs request:

(a) That by decree of your Honorable Court it may be declared that title to the premises set forth in Paragraph 3 is in the Plaintiffs and that they shall be allowed to enjoy said property in peace; and

(b) That the Defendants within twenty (20) days from the receipt of the Complaint, institute an action of ejectment against the Plaintiffs and that otherwise the Defendants be perpetually enjoined from setting up any title to said property; from impeaching, denying or in any way attacking the Plaintiffs' title to said property, from issuing or maintaining an ejectment of said premises or any part thereof.

NADDEO & LEWIS, LLC

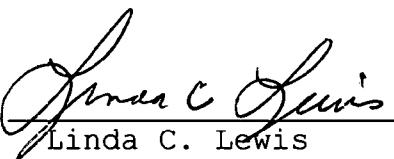
By   
\_\_\_\_\_  
Linda C. Lewis  
Attorney for Plaintiffs

EXHIBIT "A"

1. Deed from Walter Closky and Helen Olosky dated October 22, 1945 and recorded in Clearfield County Deed Book 370, page 503 on October 22, 1945.
2. Deed from Ralph J. Smith, Treasurer of the County of Clearfield to the County Commissioners dated April 24, 1950 and recorded in Clearfield County Deed Book 760, page 383 on May 17, 1978. Property was sold as property assessed in the name of Bruce Meyer.
3. Deed from the Clearfield County Commissioners to Frank Brinton and Robert Grimminger dated December 1, 1964 and recorded in Clearfield County Deed Book 760, page 384 on May 17, 1978.
4. Deed from Frank E. Brinton, widower, for his one-half interest to Emily M. Grimminger dated January 18, 1993 and recorded in Clearfield County Deed and Record Book 1510, page 103 on January 19, 1993.

EXHIBIT "B"

1. Deed from Walter Olosky and Helen Olosky dated October 22, 1945 and recorded in Clearfield County Deed Book 370, page 503 on October 22, 1945.
2. Deed from J. Bruce Meyer and Mary Meyer to Oscar A. Beckman dated July 28, 1949 and recorded in Clearfield County Deed Book 699, page 321 on April 25, 1975.

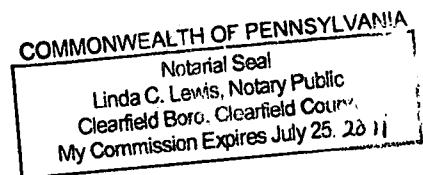
Before me, the undersigned officer, personally appeared ROBERT GRIMMINGER and EMILY M. GRIMMINGER, who being duly sworn according to law, depose and state that the facts set forth in the foregoing Complaint are true and correct to the best of their knowledge, information and belief.

Robert Grimminger  
Robert Grimminger

Emily M. Grimminger  
Emily M. Grimminger

SWORN and SUBSCRIBED before me this 10 day of March, 2008.

Jonda C. Lewis





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MOTION FOR SPECIAL ORDER DIRECTING  
SERVICE BY PUBLICATION

NOW COME the Plaintiffs in the above-captioned matter  
and set forth the following:

1. The Movants are the Plaintiffs in the above-captioned matter.

2. The Movants filed a Quiet Title Action on or about March 18, 2008.

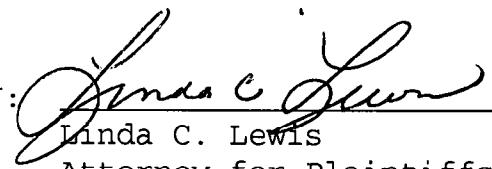
3. The Movants desires to have your Honorable Court enter an Order pursuant to Pa. R.C.P. No. 430.

4. In support of this request, Movants incorporate the attached affidavit.

WHEREFORE, Movants respectfully request your Honorable Court to grant the relief sought in this Motion.

NADDEO & LEWIS, LLC

BY:

  
Linda C. Lewis  
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
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AFFIDAVIT PURSUANT TO PA. R.C.P. 430

1. Counsel for Movants has been unable to determine the whereabouts of the Defendants, J. Bruce Meyer and Mary Meyer.

2. Movants and Counsel for Movants have made the following attempts to locate Defendant:

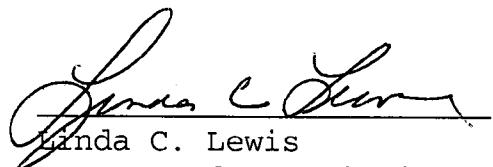
A. Telephone directory assistance for Clearfield, Philipsburg, DuBois, and Pittsburgh, Pennsylvania, and surrounding areas.

B. Local tax records.

C. Internet search.

I verify that the statements made in the Affidavit are true and correct. I understand that false statements herein are made subject to the penalties of Pa. C. S. Section 4904 relating to unsworn falsifications to authorities.

NADDEO & LEWIS, LLC

BY:   
Linda C. Lewis  
Attorney for Plaintiffs

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ORDER GRANTING MOTION FOR SPECIAL ORDER  
DIRECTING SERVICE BY PUBLICATION

AND NOW, this 20<sup>th</sup> day March, 2008, upon  
consideration of the Plaintiffs' Motion for Special Order  
Directing Service by way of Publication, and it appearing to the  
Court that Plaintiffs have made a good faith effort to locate  
and serve Defendants, J. Bruce Meyer and Mary Meyer, it is  
hereby ORDERED that the Motion is granted and that service upon  
the Defendants, J. Bruce Meyer and Mary Meyer, is to be made by  
way of publication by advertising the Notice required by Pa.

R.C.P. No. 430 in the Clearfield County Law Journal and once in  
a newspaper of general circulation within the County.

BY THE COURT

Paul E Cherry

3-24-08

\_\_\_\_ available for serving all appropriate parties.

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

\_\_\_\_ Plaintiff(s)  Plaintiff(s) Attorney \_\_\_\_ Other

\_\_\_\_ Defendant(s) \_\_\_\_ Defendant(s) Attorney

\_\_\_\_ Special Instructions:

FILED

MAR 21 2008

William A. Shaw  
Prothonotary/Clerk of Courts

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\* Type of Pleading:

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\* **CERTIFICATE OF SERVICE**

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\* Filed on behalf of:  
\* Plaintiffs

\*

\* Counsel of Record for  
\* this party:

\*

\* Linda C. Lewis, Esq.  
\* Pa I.D. 80478

\*

\* Naddeo & Lewis, LLC  
\* P.O. Box 552  
\* Clearfield, PA 16830  
\* (814) 765-1601

FILED NOCC  
03:30 PM  
APR 28 2008  
WM

William A. Shaw  
Prothonotary/Clerk of Courts

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CERTIFICATE OF SERVICE

I, Linda C. Lewis, Esquire, do hereby certify that  
Notice of Default was served on the following and in the following  
manner on the 28rd day of April, 2008:

First-Class Mail, Postage Prepaid

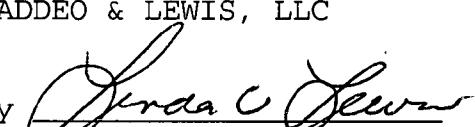
Dollie Beckman  
9351 Curwensville-Tyrone Hwy.  
Olanta, PA 16863

Frederick Beckman  
PO Box 46  
Olanta, PA 16863

Caroline Smith  
903 Olanta Road  
Olanta, PA 16863

Ruth Rollin  
145 Center Street  
Cambridge Springs, PA 16403

NADDEO & LEWIS, LLC

By   
Linda C. Lewis  
Attorney for Plaintiffs

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\* ACTION TO QUIET TITLE

Type of Pleading:  
**PRAECLPICE FOR DEFAULT  
JUDGMENT**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:  
Linda C. Lewis, Esq.  
Pa I.D. 80478

Naddeo & Lewis, LLC  
P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601

FILED NO  
MAY 19 2008 CC  
MAY 19 2008 (GP)

William A. Shaw  
Prothonotary/Clerk of Courts

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PRAECIPE FOR DEFAULT JUDGMENT

AND NOW, this 19th day of May, 2008, an Affidavit having been executed and filed on behalf of the Plaintiffs that the Complaint with Notice to Defend had been served on the Defendants, J. Bruce Meyer and Mary Meyer, as stated in the Affidavit; and more than twenty (20) days have expired since the date of service and the Defendants not having answered, the Plaintiffs, by their attorney, Linda C. Lewis, Esquire, move the Court to enter judgment in favor of the Plaintiffs and against the Defendants and to grant Plaintiffs the relief prayed for in their

Complaint in accordance with Pennsylvania Rules of Civil Procedure  
No. 1066.

NADDEO & LEWIS, LLC

By

  
\_\_\_\_\_  
Linda C. Lewis  
Attorney for Plaintiff



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PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Please enter judgment of default in favor of Plaintiffs, Robert Grimminger and Emily M. Grimminger, and against Defendants, Dollie Beckman, Fred Beckman, Caroline Smith and Ruth Rollin, for their failure to plead to the complaint in this action within the required time. The Complaint contains a notice to defend within twenty (20) days from the date of service thereof. Defendant, Dollie Beckman was served on April 2, 2008; Fred Beckman was served on April 2, 2008; Caroline Smith was served on April 2, 2008 and Ruth Rollin was served on

April 1, 2008 and their answers were due to be filed on April 21, 2008 and April 22, 2008.

Attached as Exhibit "A" are copies of Plaintiffs' written Notice of Intention to File Praeclipe for Entry of Default Judgment as well as copy of Certificate of Service marked Exhibit "B" showing the date of service of the Default Judgment which I certify was mailed by regular mail to the Defendants on April 28, 2008, which is at least ten days prior to the filing of this Praeclipe.



---

Linda C. Lewis  
Attorney for Plaintiffs

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

\*  
\*  
\*  
\*  
\* No. 08 - 485 - CD  
\*

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

\*

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

\*

TO: Frederick Beckman,  
Defendant

Date of Notice: April 28, 2008

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN 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.

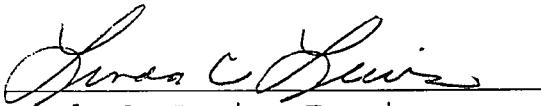
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY

OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Court Administrator  
Clearfield County Court House  
Market and Second Streets  
Clearfield, PA 16830  
(814) 765-2641 Ext. 5982

NADDEO & LEWIS, LLC

By

  
Linda C. Lewis, Esquire  
207 East Market Street  
Clearfield, PA 16830  
(814) 765-1601

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

\*

\* No. 08 - 485 - CD

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

\*

\*

TO: Caroline Smith,  
Defendant

Date of Notice: April 28, 2008

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN 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.

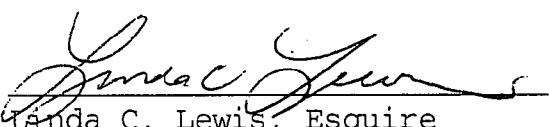
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Court Administrator  
Clearfield County Court House  
Market and Second Streets  
Clearfield, PA 16830  
(814) 765-2641 Ext. 5982

NADDEO & LEWIS, LLC

By

  
Linda C. Lewis, Esquire  
207 East Market Street  
Clearfield, PA 16830  
(814) 765-1601

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

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\*  
\* No. 08 - 485 - CD  
\*

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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TO: Ruth Rollin,  
Defendant

Date of Notice: April 28, 2008

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN 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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY

OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Court Administrator  
Clearfield County Court House  
Market and Second Streets  
Clearfield, PA 16830  
(814) 765-2641 Ext. 5982

NADDEO & LEWIS, LLC

By

  
Linda C. Lewis, Esquire  
207 East Market Street  
Clearfield, PA 16830  
(814) 765-1601

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

V.

\* \* \*

No. 08 - 485 - CD

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

\*  
\*  
\*

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

TO: Dollie Beckman,  
Defendant

Date of Notice: April 28, 2008

## IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN 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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY

OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Court Administrator  
Clearfield County Court House  
Market and Second Streets  
Clearfield, PA 16830  
(814) 765-2641 Ext. 5982

NADDEO & LEWIS, LLC

By   
Linda C. Lewis, Esquire  
207 East Market Street  
Clearfield, PA 16830  
(814) 765-1601

*4/28/08*  
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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\*  
\* No. 08 - 485 - CD

\* Type of Pleading:

\* CERTIFICATE OF SERVICE

\* Filed on behalf of:  
\* Plaintiffs

\* Counsel of Record for  
\* this party:

\* Linda C. Lewis, Esq.  
\* Pa I.D. 80478

\* Naddeo & Lewis, LLC  
\* P.O. Box 552  
\* Clearfield, PA 16830  
\* (814) 765-1601

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

V.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

CERTIFICATE OF SERVICE

I, Linda C. Lewis, Esquire, do hereby certify that  
Notice of Default was served on the following and in the following  
manner on the 28rd day of April, 2008:

First-Class Mail. Postage Prepaid

Dollie Beckman  
9351 Curwensville-Tyrone Hwy.  
Olanta, PA 16863

Frederick Beckman  
PO Box 46  
Olanta, PA 16863

Caroline Smith  
903 Olanta Road  
Olanta, PA 16863

Ruth Rollin  
145 Center Street  
Cambridge Springs, PA 16403

**NADDEO & LEWIS, LLC**

By Linda C. Lewis

Attorney for Plaintiffs



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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors, .  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

## AFFIDAVIT

Linda C. Lewis, Esquire, being duly sworn according to law, deposes and says that she is attorney for Plaintiffs and makes this affidavit on behalf of the Plaintiffs, being authorized to do so; that a complaint in this action to quiet title, containing a notice to defend within twenty days of service, was duly served on the Defendants, J. Bruce Meyer and Mary Meyer, by publication in the Progress on March 29, 2008 and the Clearfield County Legal Journal for the week of April 11, 2008, proof of publications are attached hereto; and that to date the Defendants have not filed an answer in the action.

Linda C. Lewis  
Linda C. Lewis  
Attorney for Plaintiffs

Sworn and subscribed before me this 19<sup>th</sup> day of May, 2008

Kathleen A. Ricotta

Commonwealth of Pennsylvania

NOTARIAL SEAL	
KATHLEEN A. RICOTTA, Notary Public Clearfield Boro., County of Clearfield My Commission Expires June 15, 2009	

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CIVIL DIVISION

MAY 16 2008

DO OF PUBLICATION

ROBERT GRIMMINGER and EMILY  
Plaintiffs, v. J. BRUCE MEYER and MARY  
MEYER, husband and wife, their heirs,  
executors, administrators, and assigns, and  
DOLIE BECKMAN, an individual, FRED  
BECKMAN, an individual, CAROLINE  
SMITH, an individual, RUTH ROLLIN, an  
individual, and OSCAR A. BECKMAN, his  
heirs, executors and assigns, Defendants,  
No. 08 - 485 - CD

TO: J. BRUCE MEYER and MARY  
MEYER, husband and wife, their heirs,  
executors, administrators, assigns, and  
successors in interest.

NOTICE - If you wish to defend, you  
must enter a written appearance personally  
or by attorney and file your defenses or  
objections in writing with the court. You are  
warned that if you fail to do so the case may  
proceed without you and a judgment may be  
entered against you without further notice for  
the relief requested.

April AD 2008, before me, the subscriber, a Notary  
and State, personally appeared Gary A.

NOTARY PUBLIC  
STATE OF PENNSYLVANIA  
CLEARFIELD COUNTY

GARY A. DUNN, Notary Public

NOTICE  
IN THE COURT OF COMMON  
PLEAS OF CLEARFIELD  
COUNTRY, PENNSYLVANIA CIVIL  
DIVISION 2, ROBERT GRIMMINGER,  
AND EMMY M. GRIMMINGER,  
Husband and wife, Plaintiffs, v. J.  
BRUCE MEYER and MARY  
MEYER, husband and wife, their  
heirs, executors, administrators,  
and assigns, and DOLIE BECK-  
MAN, an individual, FRED BECK-  
MAN, an individual, CAROLINE  
SMITH, an individual, RUTH ROLL-  
IN, an individual, and OSCAR A.  
BECKMAN, his heirs, executors  
and assigns, Defendants.

No. 08-485-CD  
TO: J. BRUCE MEYER and MARY  
MEYER, husband and wife, their  
heirs, executors, administrators,  
and assigns, and successors in inter-  
est.

NOTICE: If you wish to defend,  
you must enter a written appear-  
ance personally or by attorney and

PROOF OF PUBLICATION APR 03 2008

STATE OF PENNSYLVANIA

COUNTY OF CLEARFIELD

SS:

On this 2nd day of April, A.D. 20 08,  
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  
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 March 29, 2008

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.

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

Margaret E. Krebs  
Margaret E. Krebs  
COMMONWEALTH OF PENNSYLVANIA  
Notary Public  
Clearfield, Pa.  
My Commission Expires  
October 31, 2011

Cherry J. Robison, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires Oct. 31, 2011  
Member, Pennsylvania Association of Notaries

Under Form  
ir per so special, name, or  
April 16th.  
to be published in The Pro

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

V.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns.

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual. and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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\*  
\* No. 08 - 485 - CD  
\* ACTION TO QUIET TITLE

Type of Pleading:

## ORDER

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Linda C. Lewis, Esq.  
Pa I.D. 80478

Naddeo & Lewis, LLC

二二七

P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601

**FILED**

0 11:59 p.m. 06  
MAY 21 2008 ICC Atty LEWIS

William A. Shaw  
Prothonotary/Clerk of Courts

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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\* No. 08 - 485 - CD

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ORDER

AND NOW, this 21 day May, 2008, it appearing that a Complaint to Quiet Title in the above stated Action was served on the Defendants, no answer has been filed in said action on behalf of said Defendants and on motion of Linda C. Lewis, Esquire, Attorney for Plaintiffs, it is hereby ORDERED and DIRECTED that Plaintiffs be allowed to enjoy said property in peace and that the said Defendants, J. Bruce Meyer, Mary Meyer, Dollie Beckman, Fred Beckman, Caroline Smith and Ruth Rollin, be forever barred from asserting any right, title, lien or interest inconsistent with the interest or claim of the Plaintiffs as set

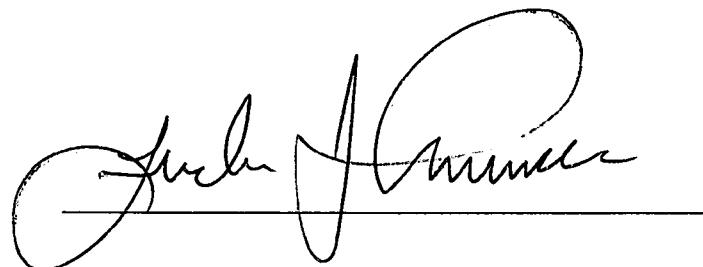
forth in their Complaint in and to ALL that certain piece or parcel of land situate in Pike Township, Clearfield County, Pennsylvania, more particularly bounded and described as follows:

BEGINNING at a Lynn on line of John Ownes; thence South 1½ degrees East 57.6 perches by lands of John Owens to a post; thence by land of William Cathcart, north 89½ degrees west 81 perches to a post; thence by land of Alfred A. Long, north 3½ degrees West 57.6 perches to a post; thence by land of John Ownes, south 89½ degrees East 76 perches to Lynn and place of beginning. Containing 26 acres 112 perches and allowance of 6% for roads and the like.

EXCEPTING and RESERVING the buildings now located upon the above described lands, and three (3) acres of surface the center of which three acre piece shall be the dwelling house now occupied by Walter Olosky and Helen Olosky.

Said ORDER shall be final and absolute unless the Defendants shall file exceptions thereto within thirty (30) days thereafter. If such action is not taken within the thirty (30) day period, the Prothonotary, on Praecept, shall enter final judgment.

BY THE COURT

A handwritten signature in black ink, appearing to read "John H. Munder", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'J' at the beginning.

DATE: 5-21-08

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:

**FILED**

**MAY 21 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual,  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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\*  
\* No. 08 - 485 - CD  
\* ACTION TO QUIET TITLE

### Type of Pleading:

**PRAECL<sup>PE</sup> FOR FINAL  
JUDGMENT**

Filed on behalf of:  
Plaintiffs

Counsel of Record for  
this party:

Linda C. Lewis, Esq.  
Pa I.D. 80478

Naddeo & Lewis, LLC  
P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601

FILED  
01/8/39/3P  
JUN 24 2008  
NOCC  
(G)

William A. Shaw  
Prothonotary/Clerk of Courts

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

ROBERT GRIMMINGER and  
EMILY M. GRIMMINGER,  
Husband and wife,

v.

\*

\*

\*

\*

\* No. 08 - 485 - CD

\*

J. BRUCE MEYER and  
MARY MEYER,  
husband and wife,  
their heirs, executors,  
administrators, and assigns,

and

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DOLLIE BECKMAN, an individual,  
FRED BECKMAN, an individual,  
CAROLINE SMITH, an individual, \*  
RUTH ROLLIN, an individual, and  
OSCAR A. BECKMAN, his heirs,  
executors and assigns.

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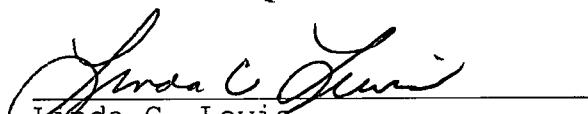
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PRAECIPE FOR FINAL JUDGMENT

TO THE PROTHONOTARY:

Please enter final judgment against the Defendants, in  
the above-captioned action for failure to respond to the Order of  
Court dated May 21, 2008.

  
\_\_\_\_\_  
Linda C. Lewis  
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103906  
NO: 08-485-CD  
SERVICE # 1 OF 4  
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: ROBERT GRIMMINGER and EMILY M. GRIMMINGER

vs.

DEFENDANT: J. BRAUCE MEYER and MARY MEYER husband & wife their heirs, executors, adm. & assigns and DOLLIE BECKMAN, FRED BECKMAN, CAROLINE SMITH AND OSCAR A. BECKMAN, et al

**SHERIFF RETURN**

---

NOW, April 02, 2008 AT 10:22 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON DOLLIE BECKMAN DEFENDANT AT 9351 CURWENSVILLE TYRONE HWY., OLANTA, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DOLLIE BECKMAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED  
0/2/2008  
JUL 07 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103906  
NO: 08-485-CD  
SERVICE # 2 OF 4  
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: ROBERT GRIMMINGER and EMILY M. GRIMMINGER

vs.

DEFENDANT: J. BRAUCE MEYER and MARY MEYER husband & wife their heirs, executors, adm. & assigns and DOLLIE BECKMAN, FRED BECKMAN, CAROLINE SMITH AND OSCAR A. BECKMAN, et al

**SHERIFF RETURN**

---

NOW, April 02, 2008 AT 10:22 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON FRED BECKMAN DEFENDANT AT 9351 CURWENSVILLE TYRONE HWY., OLANTA, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DOLLIE BECKMAN, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103906  
NO: 08-485-CD  
SERVICE # 3 OF 4  
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: ROBERT GRIMMINGER and EMILY M. GRIMMINGER  
VS.

DEFENDANT: J. BRAUCE MEYER and MARY MEYER husband & wife their heirs, executors, adm. & assigns and  
DOLLIE BECKMAN, FRED BECKMAN, CAROLINE SMITH AND OSCAR A. BECKMAN, et al

**SHERIFF RETURN**

---

NOW, April 02, 2008 AT 10:27 AM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON CAROLINE SMITH DEFENDANT AT 903 OLANTA ROAD, OLANTA, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CAROLINE SMITH, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA**

DOCKET # 103906  
NO. 08-485-CD  
SERVICE # 4 OF 4  
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: ROBERT GRIMMINGER and EMILY M. GRIMMINGER

vs.

DEFENDANT: J. BRAUCE MEYER and MARY MEYER husband & wife their heirs, executors, adm. & assigns and  
DOLLIE BECKMAN, FRED BECKMAN, CAROLINE SMITH AND OSCAR A. BECKMAN, et al

**SHERIFF RETURN**

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NOW, March 27, 2008, SHERIFF OF CRAWFORD COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON RUTH ROLLIN.

NOW, April 01, 2008 AT 2:09 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON RUTH ROLLIN, DEFENDANT. THE RETURN OF CRAWFORD COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103906  
NO: 08-485-CD  
SERVICES 4  
COMPLAINT ACTION TO QUIET TITLE

PLAINTIFF: ROBERT GRIMMINGER and EMILY M. GRIMMINGER

vs.

DEFENDANT: J. BRAUCE MEYER and MARY MEYER husband & wife their heirs, executors, adm. & assigns and DOLLIE BECKMAN, FRED BECKMAN, CAROLINE SMITH AND OSCAR A. BECKMAN, et al

**SHERIFF RETURN**

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RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NADDEO	1239	40.00
SHERIFF HAWKINS	NADDEO	1239	53.11
CRAWFORD CO.	NADDEO	1272	50.00

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

  
Chester A. Hawkins  
Sheriff

## IN THE COURT OF COMMON PLEAS OF CRAWFORD COUNTY

Pennsylvania

Robert &amp; Emily Grimminger

No. AD 2008-485-CD  
Clearfield Co

VS

Ruth Rollin

Quiet Title

## Sheriff's Return

SERVED, Ruth Rollin personally by handing her the papers on April 1, 2008 at 145 Center St Cambridge Springs, PA 16403 at 2:09pm.

So answers,

Sworn to and subscribed before me this  
3<sup>rd</sup> day of April, 2008

Emma J. Annett Duffy  
Prothonotary

Neil R Fratus  
Neil R Fratus, Deputy

Walter C Hoke  
Walter C. Hoke, Sheriff

Sheriff's Cost \$ 50.00  
April 3, 2008



CHESTER A. HAWKINS  
SHERIFF

# Sheriff's Office Clearfield County

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

OFFICE (814) 765-2641  
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 103906

TERM & NO. 08-485-CD

ROBERT GRIMMINGER and EMILY M. GRIMMINGER

COMPLAINT ACTION TO QUIET TITLE

VS.

J. BRAUCE MEYER and MARY MEYER husband & wife their heirs, executors, adm. & assigns and  
DOLLIE BECKMAN, FRED BECKMAN, CAROLINE SMITH AND OSCAR A. BECKMAN, et al

**SERVE BY: 04/17/08  
COURT DATE:**

**MAKE REFUND PAYABLE TO NADDEO & LEWIS, LLC**

**SERVE:** RUTH ROLLIN

**ADDRESS:** 145 CENTER ST., CAMBRIDGE SPRINGS, PA 16403

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby depelize the SHERIFF OF CRAWFORD COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, March 27, 2008

RESPECTFULLY,

CHESTER A. HAWKINS,  
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

RECEIVED  
CLEARFIELD COUNTY  
MARCH 31 AM 9:43