

08-2024-CD  
Getrud Brown vs Richard Buchheit

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN,

Plaintiff

No. 2008-2024-CD

OCT 22 2008

S 012-0576  
William A. Shaw  
Prothonotary/Clerk of Courts  
3 cent to file

Vs.

RICHARD BUCHEIT,

Defendant

Type of Pleading:

**ACTION FOR  
QUIET TITLE**

Filed on Behalf of:  
PLAINTIFF

Counsel of Record for this Party:

Jeffrey S. DuBois, Esquire  
Supreme Court No. 62074  
210 McCracken Run Road  
DuBois, PA 15801

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. \_\_\_\_\_  
Plaintiff :  
: Vs. :  
: :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

**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, 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.

Office of Court Administrator  
Clearfield County Courthouse  
230 E. Market St., Suite 228  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. \_\_\_\_\_  
Plaintiff :  
: :  
Vs. : :  
: :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

**ACTION IN QUIET TITLE**

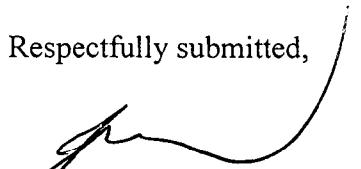
AND NOW, comes the plaintiff, Gertrud Brown, by and through her attorney, Jeffrey S. DuBois, Esquire, who files this Action In Quiet Title and in support thereof avers the following:

1. Plaintiff, Gertrud Brown, is an adult individual with an address of 4 Oakland Avenue, DuBois, Pennsylvania, 15801.
2. Defendant, Richard Bucheit, is an adult individual with an address of 601 N. Tenth Street, Hamilton, Montana 59840.
3. The Defendant is the son-in-law of the Plaintiff.
4. The subject matter herein deals with the purchase of real estate located in Clearfield County, and therefore venue is proper in this case.
5. Plaintiff purchased a property at 200 Twelfth Street, DuBois, Pennsylvania on March 12, 2007. A copy of said deed is attached hereto as Exhibit "A".
6. The property was put into the names of Plaintiff's daughters, Tina Fay Lawrie and Linda Bucheit. The said Linda Bucheit is the Defendant's wife.

7. The reason for placing the property in the names of the daughters' was by agreement of both daughters and Plaintiff.
8. The proceeds used to purchase said property were borrowed by Plaintiff from her family in Germany.
9. Neither of the daughters of Plaintiff, Tina Fay Lawrie nor Linda Bucheit, used any of their money for the purchase of this real estate.
10. Defendant never used any of his monies for the purchase of the above referenced property.
11. Because of the fact Defendant didn't use any of his monies, or his wife's monies, and because Plaintiff purchased the property and has maintained the property, Defendant has no legal interest in the house or property.
12. Moreover, Defendant, at most, would have an equitable interest because of his marital relationship to Linda Bucheit. However, because the property was just recently purchased and the current bad housing market, any interest in negligible.
13. Plaintiff is attempting to sell the property located at 200 Twelfth Street.
14. Defendant is refusing to sign off on said parcel.
15. Because of the fact Defendant has no legal interest in said parcel, there is no reason Defendant should not sign off on the same.
16. Defendant's refusal to sign is preventing Plaintiff from selling said property.
17. Therefore, Plaintiff is requesting this Honorable Court to issue an order requiring Defendant to sign off on said property.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to (a) enter an Order declaring Defendant, Richard Bucheit, is barred from asserting any right, lien, title, or interest in the property on the basis that he has no legal interest in the same; (b) enter a judgment ordering the recorder of deeds to sign the deed on his behalf; and (c) grant such further relief as may be just and equitable.

Respectfully submitted,



---

Jeffrey S. DuBois, Esquire  
Attorney for Plaintiff

# CLEARFIELD COUNTY RECORDER OF DEEDS

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

Instrument Number - 200705035  
Recorded On 3/30/2007 At 9:39:49 AM

\* Instrument Type - DEED  
\* Total Pages - 5  
Invoice Number - 164444  
\* Grantor - SNYDER, JUDITH A  
\* Grantee - LAWRIE, TINA F  
\* Customer - JEFFREY S DUBOIS

\* FEES

STATE TRANSFER TAX	\$1,123.00
STATE WRIT TAX	\$0.50
JCS/ACCESS TO JUSTICE	\$10.00
RECORDING FEES -	\$13.00
RECORDER	
RECORDER IMPROVEMENT	\$3.00
FUND	
COUNTY IMPROVEMENT FUND	\$2.00
DUBOIS AREA SCHOOLS	\$561.50
REALTY TAX	
SANDY TOWNSHIP	\$561.50
TOTAL PAID	\$2,274.50

\*RETURN DOCUMENT TO:

JEFFREY S DUBOIS  
190 WEST PARK AVE, SUITE 5  
DUBOIS, PA 15801

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



*Karen L. Starck*

Karen L. Starck  
Recorder of Deeds

THIS IS A CERTIFICATION PAGE

## Do Not Detach

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT

\* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

Exhibit A

County Parcel No. \_\_\_\_\_

## THIS DEED,

MADE the 12th day of March, in the year two thousand and seven (2007)

BETWEEN **JUDITH A. SNYDER** *Single*, whose address is 200 Twelfth Street, DuBois, Pennsylvania 15801, hereinafter referred to as "Grantor",

A  
N  
D

**TINA F. LAWRIE**, *a married individual*, whose address is 6 Oakland Avenue, DuBois, Pennsylvania, *as to a one-half interest*; and **LINDA T. BUCHEIT**, *a married individual*, whose address is 5439 Teepee Drive, Flores, Montana 59833, *as to a one-half interest*, **both one-half interests to be held as tenants in common**, hereinafter referred to as "Grantee",

The words "Grantor" and "Grantee" shall mean all Grantors and Grantees listed above.

WITNESSETH, That in consideration of ONE HUNDRED TWELVE THOUSAND THREE HUNDRED DOLLARS (\$112,300.00), in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey to the said Grantee,

ALL that certain lot or piece of land situate in the Township of Sandy, County of Clearfield, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a POST at the Northwest corner of land now or formerly of William Murray, Jr. and Twelfth Street;

Thence along said Twelfth Street in a northerly direction 100 feet to a post;

Thence in an easterly direction 150 feet to a post at an alley;

Thence along said alley 100 feet in a southerly direction to a post at line of land now or formerly of William Murray, Jr.

Thence along said land now or formerly of William Murray, Jr., 150 feet in a westerly direction to a post at the corner of lands now or formerly of the said William Murray, Jr., and Twelfth Street, the place of beginning.

Thence along said land now or formerly of William Murray, Jr., 150 feet in a westerly direction to a post at the corner of lands now or formerly of the said William Murray, Jr., and Twelfth Street, the place of beginning.

UNDER AND SUBJECT to all reservations, exceptions and conditions as contained in prior deeds.

BEING the same premises which became vested in Judith A. Snyder, by deed of Judith A. Winslow, now known by marriage and Judith A. Snyder and Jerry L. Snyder, her husband, dated November 9, 2004 and recorded in the office of the Recorder of Deeds for Clearfield County as Instrument #200418747.

PROMISES: And the said Grantor herein will **SPECIALLY WARRANT** and forever defend the property hereby conveyed.

IN WITNESS WHEREOF, said Grantor has hereunto set their hand and seal, the day and year first above-written.

WITNESS:

Hannah L. Erick

Judith A. Snyder (SEAL)

JUDITH A. SNYDER

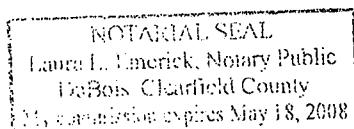
COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

: SS:

On this, the 13<sup>th</sup> day of March, 2007, before me, the undersigned officer, personally appeared JUDITH A. SNYDER, single, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

My Commission Expires:



Laura L. Americk  
Notary Public

## NOTICE

In accordance with the provisions of "The Bituminous Mine Subsidence and Land Conservation Act of 1966", I/we, the undersigned grantee/grantees, hereby certify that I/we know and understand that I/we may not be obtaining the right of protection against subsidence resulting from coal mining operations and that the purchased property may be protected from damage due to mine subsidence by a private contract with the owners of the economic interest in the coal. I/we further certify that this certification is in a color contrasting with that in the deed proper and is printed in twelve point type preceded by the word "notice" printed in twenty-four point type.

Witness:

.....

.....  
Linda J. Lawrie  
.....  
Linda J. Buchheit  
.....

This ..... day of .....

THIS DOCUMENT MAY NOT SELL, CONVEY, TRANSFER, INCLUDE OR  
INSURE THE TITLE OF THE COAL AND RIGHT OF SUPPORT UNDERNEATH  
THE SURFACE LAND DESCRIBED OR REFERRED TO HEREIN, AND THE  
OWNER OR OWNERS OF SUCH COAL MAY HAVE THE COMPLETE LEGAL  
RIGHT TO REMOVE ALL OF SUCH COAL AND, IN THAT CONNECTION,  
DAMAGE MAY RESULT TO THE SURFACE OF THE LAND AND ANY HOUSE,  
BUILDING OR STRUCTURE ON OR IN SUCH LAND. THE INCLUSION OF THIS  
NOTICE DOES NOT ENLARGE, RESTRICT OR MODIFY ANY LEGAL RIGHTS  
OR ESTATES OTHERWISE CREATED, TRANSFERRED, EXCEPTED OR  
RESERVED BY THIS INSTRUMENT. (This Notice is set forth pursuant to Act No.  
255, approved September 10, 1965, as amended.)

#### CERTIFICATE OF RESIDENCE

I/we hereby certify that the precise residence for the Grantee herein is as follows:

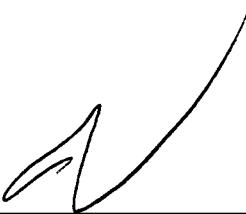
8 Oakland Ave.  
Duluth GA 30136

  
\_\_\_\_\_  
Attorney or Agent for Grantee

**VERIFICATION**

I, JEFFREY S. DUBOIS, Esquire, on behalf of Plaintiff, Gertrud Brown, verify that the statements in the foregoing Action for Quiet Title are true and correct to the best of my knowledge, information and belief. The undersigned is in possession of this information based on conversations with and representation of Plaintiff. Plaintiff is currently unavailable and a signed verification by Plaintiff will be submitted as soon as Plaintiff is in contact with the undersigned.

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



---

Jeffrey S. DuBois, Esquire

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. \_\_\_\_\_  
Plaintiff :  
: Vs. :  
: :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 21<sup>st</sup> date of October, 2008, I served a true and correct copy of the within Action for Quiet Title by first class mail on the following:

Richard Bucheit  
Discovery Care Center  
601 N. Tenth Street  
Hamilton, MT 59840

Howard Recht, Esquire  
100 W. Main Street, Suite A  
Hamilton, MT 59840



---

Jeffrey S. DuBois, Esquire  
Attorney for Defendant

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CJ  
Plaintiff :  
Vs. :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
|

**RULE TO SHOW CAUSE AT HEARING**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2008, upon consideration  
of the Plaintiff's Action for Quiet Title;

A Rule Returnable and hearing is issued upon Defendant to show cause why  
Relief Requested by Plaintiff should not be granted.

IT IS HEREBY ORDERED AND DECREED, that a hearing be scheduled for the  
\_\_\_\_\_ day of \_\_\_\_\_, 2008 AT \_\_\_\_\_, \_\_. M., IN Courtroom \_\_\_\_\_ at the  
Clearfield County Courthouse.

BY THE COURT:

---

Judge

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN,

Plaintiff

No. 2008-2024-CD

Vs.

RICHARD BUCHEIT,

Defendant

Type of Pleading:

**CERTIFICATE OF SERVICE**

Filed on Behalf of:

PLAINTIFF

Counsel of Record for This Party:

Jeffrey S. DuBois, Esquire

Supreme Court No. 62074

210 McCracken Run Road

DuBois, PA 15801

(814) 375-5598

5  
FILED  
OCT 10 2008  
NOV 26 2008  
CC Atty DuBois  
LM

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CD  
Plaintiff :  
: Vs. :  
: :  
RICHARD BUCHEIT, :  
: :  
Defendant :  
:

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 25<sup>th</sup> day November, 2008, I served a true and correct copy of the within Important Notice by first class mail, postage prepaid, on the following:

Richard Bucheit  
Discovery Care Center  
601 N. Tenth Street  
Hamilton, MT 59840



---

Jeffrey S. DuBois, Esquire

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024  
Plaintiff :  
Vs. : Type of Pleading:  
: : **MOTION FOR RELIEF  
BASED ON JUDGMENT  
AGAINST DEFENDANT**  
RICHARD BUCHEIT, :  
Defendant : Filed on Behalf of:  
: PLAINTFF :  
: Counsel of Record for this Party:  
: Jeffrey S. DuBois, Esquire  
: Supreme Court No. 62074  
: 210 McCracken Run Road  
: DuBois, PA 15801

FILED *12/22/08* *Atty DuBois*  
DEC 22 2008  
*6K*  
S William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CD  
Plaintiff :  
: Vs. :  
: :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

**MOTION FOR RELIEF BASED ON  
JUDGMENT AGAINST DEFENDANT**

AND NOW, comes the Plaintiff, Gertrud Brown, by and through her attorney, Jeffrey S. DuBois, Esquire, who files this Motion for Relief based on Judgment against Defendant, and in support thereof avers the following:

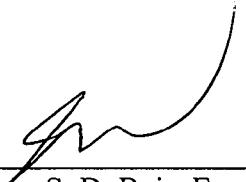
1. This case involves a Quiet Title Action with respect to a verification of title rights concerning real property.
2. Specifically, Plaintiff purchased property located in Sandy Township, Clearfield County, Pennsylvania on March 12, 2007.
3. For tax purposes, the property was placed into her daughter's names as opposed to Plaintiff's name.
4. None of the daughters placed any of their monies towards the purchase of the home, and all the monies for said home were from and /or borrowed by, Plaintiff.
5. Defendant is the husband of Linda Bucheit, daughter of Plaintiff.

6. Plaintiff attempted to have Defendant sign off on said property so that she could sell the aforementioned said real property as the same is listed for sale.
7. Despite the fact Defendant has no put up no monies for said property, and any marital interest would be negligible, at best, Defendant refused to sign said deed.
8. As a result, an Action to Quiet Title was filed against Defendant in a Complaint which was filed with this Honorable Court on October 22, 2008, and served on Defendant on October 30, 2008 by certified mailing.
9. Defendant failed to file an Answer within twenty (20) days of said Complaint.
10. Thereafter, Counsel for Plaintiff filed an Important Notice against Defendant informing him that he had failed to file an Answer to the Complaint, and only had ten (10) additional days to do so, or a Judgment could be entered against him.
11. More than ten (10) days has elapsed since the filing of the Important Notice, and Defendant has still failed to file an Answer in this Complaint.
12. Because of Defendant's failure to file an Answer in this case, Judgment has been entered against him in this matter.
13. In light of the fact Judgment has been entered against Defendant, and because he has neither a marital interest nor claim in the property, and Defendant has not invested any monies in said property, said property should be solely in the names of Plaintiff's daughters, Tina F. Lawrie and Linda T. Bucheit.
14. As a consequence, Plaintiff requests this Honorable Court to issue an Order directing the Recorder of Deeds that the Defendant, Richard Bucheit, is barred

from asserting any right, lien, title or interest to the subject property in this case and Judgment ordering the Recorder of Deeds to sign the deed on his behalf.

WHEREFORE, Plaintiff requests this Honorable Court to issue an Order directing the Recorder of Deeds that the Defendant, Richard Bucheit, is barred from asserting any right, lien, title or interest to the subject property in this case and Judgment ordering the Recorder of Deeds to sign the deed on his behalf.

Respectfully submitted,



---

Jeffrey S. DuBois, Esquire  
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN,	:	No. 2008-2024-CD
	Plaintiff	:
		:
Vs.	:	
		:
RICHARD BUCHEIT,	:	
		:
	Defendant	:

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 18<sup>th</sup> day December, 2008, I served a true and correct copy of the within Motion for Relief Based on Judgment Against Plaintiff by first class mail, postage prepaid, on the following:

Richard Buchheit  
Discovery Care Center  
601 N. Tenth Street  
Hamilton, MT 59840



CR

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CD  
Plaintiff :  
: Vs.  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

**ORDER OF COURT**

AND NOW, this 23<sup>rd</sup> day of December, 2008, in consideration of Plaintiff's Motion for Relief Based on Judgment Against Defendant,

IT IS HEREBY ORDERED AND DECREED that the recorder of Deeds that the Defendant, RICHARD BUCHEIT, is barred from asserting any right, lien, title, or interest to the subject property in this case and the Recorder of Deeds is hereby authorized to sign the deed on his behalf.

BY THE COURT:

  
\_\_\_\_\_  
Judge

5  
**FILED** 2008  
0123364 Atty. Dubois  
DEC 23 2008  
  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN,  
Plaintiff

Vs.

RICHARD BUCHEIT,  
Defendant

: No. 2008-2024-CD

: Type of Pleading:

: **AFFIDAVIT OF SERVICE**

: Filed on Behalf of:  
PLAINTIFF

: Counsel of Record for This Party:

: Jeffrey S. DuBois, Esquire  
: Supreme Court No. 62074  
: 210 McCracken Run Road  
: DuBois, PA 15801  
: (814) 375-5598

**FILED**  
01/22/2009  
DEC 22 2008

S William A. Shaw  
Prothonotary/Clerk of Courts (610)

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CD  
Plaintiff :  
Vs. :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

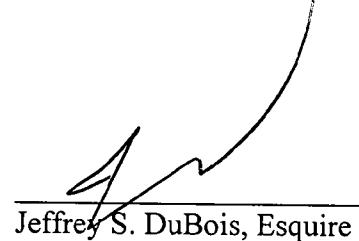
**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA

SS:

COUNTY OF CLEARFIELD

The undersigned, JEFFREY S. DUBOIS, hereby swears and affirms that the Defendant, RICHARD BUCHEIT, was duly served with a copy of the ACTION IN QUIET TITLE in the above matter at his place of residence with a mailing address of 601 N. Tenth Street, Hamilton, Montana 59840, on October 30, 2008, by the United States Postal Service, Certified Mail, the return receipt, No. 7006 2760 0001 8116 6917 is attached hereto.

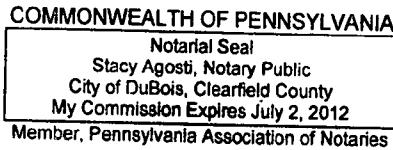


\_\_\_\_\_  
Jeffrey S. DuBois, Esquire

Sworn and subscribed before me this

18<sup>th</sup> day of December, 2008.

Stacy Agost  
Notary Public



IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN,

Plaintiff

No. 2008-2024

Vs.

RICHARD BUCHEIT,

Defendant

Type of Pleading:

**PRAECIPE FOR ENTRY OF  
JUDGMENT FOLLOWING  
SERVICE OF RULE 237.1  
NOTICE**

Filed on Behalf of:  
PLAINTIFF

Counsel of Record for this Party:

Jeffrey S. DuBois, Esquire  
Supreme Court No. 62074  
210 McCracken Run Road  
DuBois, PA 15801

**FILED** 2cc  
of 2/25/08 Atty DuBois  
DEC 22 2008 (will serve def)  
S William A. Shaw (610)  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN,	:	No. 2008-2024-CD
Plaintiff	:	
	:	
Vs.	:	
	:	
	:	
RICHARD BUCHEIT,	:	
Defendant	:	

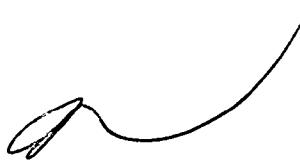
**PRAECIPE FOR ENTRY OF JUDGMENT FOLLOWING  
SERVICE OF RULE 237.1 NOTICE**

To The Prothonotary:

Please enter judgment of default in favor of Plaintiff, Gertrud Brown and against Defendant, Richard Bucheit for Defendant's 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 was served with the Complaint on October 30, 2008, and Defendant's Answer was due to be filed on November 20, 2008.

Attached as Exhibit A is a copy of Plaintiff's written Notice of Intention to File Praecipe for Entry of Default Judgment, which I certify was mailed by certified mail to the Defendant at his place of employment on December 1, 2008, which is at least ten (10) days prior to the filing of this Praecipe.

Please a) enter an Order declaring Defendant, Richard Bucheit, is barred from asserting any right, lien, title or interest in the property on the basis that he has no legal interest in the same; b) enter a judgment ordering the recorder of deeds to sign the deed on his behalf; and (c) grant such further relief as may be just and equitable, being the request of the Complaint.



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Jeffrey S. DuBois, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CD  
Plaintiff :  
: Vs. :  
: :  
: :  
RICHARD BUCHEIT, :  
Defendant :  
:

**NOTICE**

Pursuant to Pa.R.C.P. 236, you are hereby notified that a JUDGMENT BY  
DEFAULT has been entered against you in the above proceeding.

  
\_\_\_\_\_  
Prothonotary

12/22/08

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ACTION IN EQUITY

GERTRUD BROWN, : No. 2008-2024-CD

Plaintiff :  
:

Vs. :  
:

RICHARD BUCHEIT, :  
:

Defendant :  
:

TO: Richard Bucheit  
Discovery Care Center  
601 N. Tenth Street  
Hamilton, MT 59840

Date of Notice: November 25, 2008

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY 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 NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

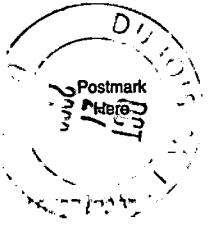
William A. Shaw, Prothonotary  
Clearfield County Courthouse  
230 E. Market Street  
Clearfield, PA 16830  
814-765-2641



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Jeffrey S. DuBois, Esquire  
Attorney for Plaintiff  
210 McCracken Run Road  
DuBois, PA 15801  
(814) 375-5598

7006 2760 0001 8116 6917

U.S. Postal Service™ <b>CERTIFIED MAIL™ RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
<p><i>Sent To</i> Richard Buchheit <i>Street, Apt. No.;</i> Discovery Care Center <i>or PO Box No.</i> 601 N. Tenth Street <i>City, State, ZIP+4</i> Hamilton, MT 59840</p>	
 Postmark PA 1995 10/10/06	

**Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

**Important Reminders:**

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Richard Bucheit  
Discovery Care Center  
601 N. Tenth Street  
Hamilton, MT 59840

**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

*Nicole Nichols*  Agent  
 Addressee

**B. Received by (Printed Name)**

*Nicole Nichols* 10/30/08

**C. Date of Delivery****D. Is delivery address different from item 1?  Yes**

If YES, enter delivery address below:  No

**3. Service Type**

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

**4. Restricted Delivery? (Extra Fee)  Yes****Article Number**

Transfer from service label)

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3811 February 2004

Domestic Return Receipt

10505100115001

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. 10

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

Jeffrey S. DuBois Law Office  
210 McCracken Run·Road  
DuBois, PA 15801

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