

DOCKET NO. 174

NUMBER TERM YEAR

301 September 1961

Alice Nithey Shubert

VERSUS

Ansel Shubert

# Affidavit of Service

Alice Withey Shubert }  
vs. }  
Ansel Shubert }  
No. 301 Sept Term, 19-61  
— Replevin  
Returnable within \_\_\_\_\_ days  
from date of service hereof.

NOW October 18, 19-61 at 9.20 o'clock A.M.  
served the within Replevin  
on Ansel Shubert  
at corner of Market And Second Street, Clearfield, Pa.

by Handing to him personally  
a true and attested copy of the original Replevin  
known to him the contents thereof.

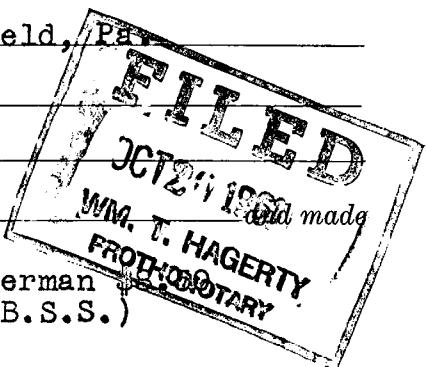
Costs. Sheriff Amerman  
(Paid by Attys B.S.S.)

Sworn to before me this 19th  
day of October A. D. 19-61

Wm T. Hagerty  
Prothonotary

So answers,

Charles G. Amerman  
Charles G. Amerman  
Sheriff.



Sheriff

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNA.

No. 301 Sept Term, 1961

MICE WITH THE SHIESTY V.S.

ANSEL SHUBERT

## COMPLAINT

TO THE ABOVE-NAMED DEFENDANT

You are hereby required to enter an appearance and file an Answer to the within Complaint, within twenty (20) days after the date of service hereof.

BELL, SILBERBLATT & SWOPE

by Rich Levy  
Attorneys for Plaintiff

1  
LAW LIBRARY  
FILED  
1951

1961

30114 1984  
- WAGERTY

WM. T. HANOTARY  
1. STATIONER & SWAGGER

ATTORNEYS AT LAW  
CLEARFIELD TRUST CO. BLDG.  
CLEARFIELD, PENNA.

OCOMMERCIAL PRINTING CO., CLEARFIELD,

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ALICE WITHEY SHUBERT

versus

ANSEL SHUBERT

:

: No. 301 Sept

Term, 1961

:

Replevin

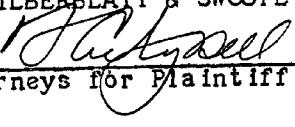
TO WILLIAM T. HAGERTY, PROTHONOTARY:

Sir:

Issue Writ of Replevin in the above entitled action against the Defendant above named to recover possession for the Plaintiff of the various goods and chattels mentioned in the Complaint attached hereto, returnable sec. leg.

BELL, SILBERBLATT & SWOPE

by

  
Attorneys for Plaintiff.

COMPLAINT

(1). The Plaintiff above-named is a married woman, wife of the Defendant and mother of 2 children, Darla, born January 10, 1959 and Micelle, born September 30, 1960.

(2). Plaintiff and Defendant are husband and wife, and up until the 19th day of September, 1961, resided together in a Vicount Trailer, in Lawrence Township, Clearfield County, Pennsylvania, on a lot adjoining the property of Defendant's parents.

(3). When the Plaintiff left the trailer, she took with her, her two daughters and is now residing temporarily with her mother in Bradford Township.

(4). That the Plaintiff has requested the Defendant to surrender to her certain properties which belong individually to she or the children, and he has refused to do so, hence this suit.

(5). That the articles herein sought by the Plaintiff are:

- (a). one (1) outdoor gym set, a gift of the Plaintiff's mother to children of the Plaintiff and Defendant;
- (b). a girl's tricycle, gift from the Plaintiff and grandmother;
- (c). Two (2) bunk beds, a gift from the Defendant to his children on their birthday;
- (d). one (1) set of glasses, given by the Plaintiff's mother;
- (e). following presents given by the Defendant to the Plaintiff:

Electric percolator

General Electric Mixer

set of Bon Ton dishes, service for 8

Sunbeam Fry pan

electric clock radio, given Plaintiff by Defendant, prior to marriage

one (1) broiler

- (f). Portable Silvertone Television set, gift to Plaintiff from Defendant;
- (g). one (1) lot of linens, towels, stand-covers;
- (h). one (1) odd lot of sovenirs given by Defendant and other members of the family;
- (i). Christmas decorations purchased by both Defendant and Plaintiff for the children;
- (j). Six or Seven throw rugs;
- (k). one (1) living room suite, balance on which was paid by mother of Plaintiff;
- (l). one (1) lot of cooking utensils;
- (m). Two (2) sets service for 8 silverware;
- (n). one (1) glass crystal set;
- (o). curtains;
- (p). crib and child's training chair
- (q). G. E. iron and ironing board
- (r). shadow box mirror
- (s). chest of drawers

All of these said items are in the trailer, or in the house  
of Defendant's parents in Lawrence Township, Clearfield County  
Pennsylvania.

BELL, SILBERBLATT & SWOPE

by Mark Bell  
Attorneys for Plaintiff.

STATE OF PENNSYLVANIA : SS:  
COUNTY OF CLEARFIELD :

ALICE WITHEY SHUBERT, being duly sworn according to law,  
deposes and states, that the facts set forth in the foregoing  
Complaint, are true and correct, to the best of her knowledge,  
information and belief.

Sworn and subscribed to  
before me this 13 day  
of October, 1961

Mr. Tifaghi

DOE  
Attestation Party  
1st Assistant, etc.