

ELKLAND CAMP : IN THE COURT OF COMMON PLEAS
MEETING ASSOCIATION : OF THE COUNTY OF SULLIVAN
Plaintiff : COMMONWEALTH OF PENNSYLVANIA

vs. : DOCKET NO.

JOSEPH PRIESTLY, MARY :
PRIESTLY, JOSEPH :
PRIESTLEY, JR., :
ELIZABETH PRIESTLEY, :
WILLIAM PRIESTLEY, :
HENRY PRIESTLEY, and :
their successors, heirs, :
administrators, and anyone claiming :
by, through, or under them; :
and all other persons unknown :
claiming any right, title, estate, :
lien, or interest in the real property :
described in the complaint and :
known as tax parcel 06-102-0031 :
adverse to plaintiff's ownership, :
or any cloud on plaintiff's title :
Defendants :

NOTICE TO DEFEND

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 an 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 THE 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.

Prothonotary of Sullivan County
Sullivan County Courthouse
Laporte, Pennsylvania 18626

AMERICANS WITH DISABILITIES ACT OF 1990

The Court of Common Pleas of Sullivan County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the court, please contact the Court Administrator's office, telephone number (570) 836-3151. All arrangements must be made at least 72 hours prior to any hearing or business before the court.

Respectfully Submitted,

GREEVY & ASSOCIATES

By: _____

Lester L. Greevy, Jr., Esq.
Attorney for Defendant
Attorney Id. No. 07536
1460 Washington Avenue
Williamsport, PA 17701

Date:

ELKLAND CAMP
MEETING ASSOCIATION
Plaintiff

vs.

JOSEPH PRIESTLY, MARY
PRIESTLY, JOSEPH
PRIESTLEY, JR.,
ELIZABETH PRIESTLEY,
WILLIAM PRIESTLEY,
HENRY PRIESTLEY, and
their successors, heirs,
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IN THE COURT OF COMMON PLEAS
OF THE COUNTY OF SULLIVAN
COMMONWEALTH OF PENNSYLVANIA

DOCKET NO.

COMPLAINT TO QUIET TITLE BASED ON ADVERSE POSSESSION

AND NOW, comes the Plaintiff, by and through its attorney, Lester L. Greevy, Jr., Esquire, and sets forth a claim against the Defendants all persons unknown, claiming any right, title, estate, lien, or interest in the real property described in the Complaint adverse to Plaintiff's ownership, or any cloud upon Plaintiff's title thereto, and for cause of action alleges:

1. That Plaintiff is in actual possession of the following real estate situated in the County of Sullivan, Commonwealth of Pennsylvania, described as follows: Tax Parcel Number

06-102-0031 consisting of 10.63 acres; bounded on the North by lands of Richard Powers, Tax Parcel Number 6-102-15; bounded on the East by Norton Road; bounded on the South by lands of Lea Ann Phinney, Tax Parcel Number 6-102-32; bounded on the West by lands of Bryce Bedford. Tax Parcel Number 6-102-13. That property is further described by a surveyor's narrative attached hereto as Exhibit A.

2. That the above-described real estate is part of the William Scott warrant patented by Joseph Priestly on March 11, 1794, recorded in Northumberland County Patent Book 20, page 339, and that Joseph Priestly and his wife, Elizabeth, is the last record owner of that property.

3. That Plaintiff has been in the actual, exclusive, and adverse possession of the above-described property continuously for 177 years prior to the filing of this complaint, claiming to own the same in fee simple against the whole world and having been assigned a tax parcel on that property, though no taxes have been paid because Plaintiff is a charity.

4. That an unknown party or parties may claim and assert an interest or interests therein adverse to the Plaintiff; that any such claims are without any right whatsoever; and that any such adverse party has not, nor has any of them, any estate, right, title, or interest whatsoever in said land or premises, or any part thereof.

WHEREFORE, Plaintiff prays that any and all parties claiming any right, title, estate, lien, or interest in the property described in the complaint adverse to Plaintiff's ownership, or any cloud upon Plaintiff's title thereto, may be required to set forth the nature of their several claims; that all adverse claims of such adverse parties or any of them may be determined by a decree of this court; that by said decree it be declared and adjudged that Plaintiff is the own of said premises and that adverse parties, or any of them, have no estate or interest whatsoever in or

to said land and premises; that adverse parties, and each and every one of them, be forever barred from asserting any claim whatsoever in or to said land and premises adverse to Plaintiff; and for such other relief as this Court deems just and proper.

GREEVY & ASSOCIATES,

By _____
Lester L. Greevy, Jr., Esquire
ID No. 07536
1460 Washington Blvd.
Williamsport, PA 17701
(570) 326-6561

Dated: _____