

## **FRAUDULENT CONVEYANCE** **QUIET TITLE PACKAGE**

An **action to quiet title** is a lawsuit brought in a court having jurisdiction over land disputes, in order to establish a party's title to real property against anyone and everyone, and thus "quiet" any challenges or claims to the title. It comprises a complaint that the ownership (title) of a parcel of land or other real property is defective in some fashion, typically where title to the property is ambiguous. A typical ground for complaint includes the **fraudulent conveyance of a property, perhaps by a forged deed or under coercion**.

Unlike acquisitions through a deed of sale, a quiet title action will give the party seeking such relief no cause of action against previous owners of the property.

**Court of Common Pleas of Philadelphia  
County Trial Division  
Civil Cover Sheet**

For Office of Judicial Records Use Only (Docket Number)

PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS	TOTAL NO. OF DEFENDANTS	COMMENCEMENT OF ACTION Complaint                      Petition Action                      Notice of Appeal Writ of Summons              Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY  \$50,000.00 or less  More than \$50,000.00	COURT PROGRAMS Arbitration                      Mass Tort                      Minor Court Appeal                      Settlement Jury                                  Savings Action                      Statutory Appeals                      Minors Non-Jury                              Petition                              Commerce (Completion of Addendum Required)                      W/D/Survival Other:		
CASE TYPE AND CODE (SEE INSTRUCTIONS)			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)			IS CASE SUBJECT TO COORDINATION ORDER?  Yes                      No
<b>TO THE OFFICE OF JUDICIAL RECORDS:</b>  Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY		ADDRESS (SEE INSTRUCTIONS)	
PHONE NUMBER	FAX NUMBER		
SUPREME COURT IDENTIFICATION NO.			
SIGNATURE		DATE	

# Instructions for Completing Civil Cover Sheet

Rules of Court require that a Civil Cover Sheet be attached to any document commencing an action (whether the action is commenced by Complaint, Writ of Summons, Notice of Appeal, or by Petition). The information requested is necessary to allow the Court to properly monitor, control and dispose cases filed. A copy of the Civil Cover Sheet must be attached to service copies of the document commencing an action. The attorney or non-represented party filing a case shall complete the form as follows:

## A. Parties

### i. Plaintiffs/Defendants

Enter names (last, first, middle initial) of plaintiff, petitioner or appellant ("plaintiff") and defendant. If the plaintiff or defendant is a government agency or corporation, use the full name of the agency or corporation. In the event there are more than three plaintiffs and/or three defendants, list the additional parties on the Supplemental Parties Form. Husband and wife are to be listed as separate parties.

### ii. Parties' Addresses

Enter the address of the parties at the time of filing of the action. If any party is a corporation, enter the address of the registered office of the corporation.

iii. *Number of Plaintiffs/Defendants:* Indicate the total number of plaintiffs and total number of defendants in the action.

**B. Commencement Type:** Indicate type of document filed to commence the action.

**C. Amount in Controversy:** Check the appropriate box.

**D. Court Program:** Check the appropriate box.

**E. Case Types:** Insert the code number and type of action by consulting the list set forth hereunder. To perfect a jury trial, the appropriate fees must be paid as provided by rules of court.

## Proceedings Commenced by Appeal

### Minor Court

5M Money Judgment  
5L Landlord  
5D Denial Open Default Judgment  
5E Code Enforcement  
Other:

### Local Agency

5B Motor Vehicle Suspension-Breathalyzer  
5V Motor Vehicle Licenses, Inspections, Insurance  
5C Civil Service  
5K Philadelphia Parking Authority  
5Q Liquor Control Board  
5R Board of Revision of Taxes  
5X Tax Assessment Boards  
5Z Zoning Board  
52 Board of View  
51 Other:

Other:

### Proceedings Commenced by Petition

8P Appointment of Arbitrators  
8C Name Change – Adult  
8L Compel Medical Examination  
8D Eminent Domain  
8E Election Matters  
8F Forfeiture  
8S Leave to Issue - Subpoena  
8M Mental Health Proceedings  
8G Civil Tax Case – Petition  
Other:

## Actions Commenced by Writ of Summons or Complaint

### Contract

1C Contract  
1T Construction  
1O Other:

### Tort

2B Assault and Battery  
2L Libel and Lander  
4F Fraud  
1J Bad Faith  
2E Wrongful Use of Civil Process  
Other:

### Negligence

2V Motor Vehicle Accident  
2H Other Traffic Accident  
1F No Fault Benefits  
4M Motor Vehicle Property Damage  
2F Personal Injury – FELA  
2O Other Personal Injury  
2S Premise Liability – Slip & Fall  
2P Product Liability  
2T Toxic Tort

*T1 Asbestos*

*TZ DES*

*T2 Implant*

3E Toxic Waste

Other:

### Professional Malpractice

2D Dental  
4L Legal  
2M Medical  
4Y Other

### IG Subrogation

Equity

E1 No Real Estate  
E2 Real Estate  
1D Declaratory Judgment  
M1 Mandamus

### Real Property

3R Rent, Lease, Ejectment  
Q1 Quiet Title  
3F Mortgage Foreclosure  
1L Mechanics Lien  
P1 Partition Prevent Waste  
1V Replevin  
1H Civil Tax Case – Complaint

Other:

## F. Commerce Program

Commencing January 3, 2000 the First Judicial District instituted a Commerce Program for cases involving corporations and corporate law issues, in general. If the action involves corporations as litigants or is deemed a Commerce Program case for other reasons, please check this block AND complete the information on the "Commerce Program Addendum". For further instructions, see Civil Trial Division Administrative Docket 01 of 2000.

## G. Statutory Basis for Cause of Action

If the action is commenced pursuant to statutory authority ("Petition Action"), the specific statute must be identified.

## H. Related Pending Cases

All previously filed related cases, regardless of whether consolidated by Order of Court or Stipulation, must be identified.

## I. Plaintiff's Attorney

The name of plaintiff's attorney must be inserted herein together with other required information. In the event the filer is not represented by an attorney, the name of the filer, address, the phone number and signature is required.

**The current version of the Civil Cover Sheet may be downloaded from the FJD's website  
<http://courts.phila.gov>**

**NAME OF FILING PARTY:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

**THIS IS NOT AN  
ARBITRATION CASE**

\_\_\_\_\_  
Plaintiff  
  
vs.  
  
\_\_\_\_\_

: PHILADELPHIA COUNTY  
: COURT OF COMMON PLEAS  
: TRIAL DIVISION - CIVIL  
:  
: \_\_\_\_\_ TERM, \_\_\_\_\_  
:  
: No. \_\_\_\_\_  
:  
:

**ACTION TO QUIET TITLE  
(FRAUDULENT CONVEYANCE)**

**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 the 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 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.

PHILADELPHIA BAR ASSOCIATION  
Lawyer Referral and Information Service  
1101 Market Street, 11<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19107  
(215) 238-6333

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELFIA  
Servicio De Referencia E Información Legal  
1101 Market Street, 11<sup>th</sup> Floor  
Filadelfia, Pennsylvania 19107  
(215) 238-6333

**NAME OF FILING PARTY:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

**THIS IS NOT AN  
ARBITRATION CASE**

\_\_\_\_\_  
Plaintiff

vs.

\_\_\_\_\_

: PHILADELPHIA COUNTY  
: COURT OF COMMON PLEAS  
: TRIAL DIVISION - CIVIL  
:  
: \_\_\_\_\_ TERM, \_\_\_\_\_  
:  
: No. \_\_\_\_\_  
:  
:

**ACTION TO QUIET TITLE  
(FRAUDULENT CONVEYANCE)**

Plaintiff, hereby files this Complaint against the Defendant to Quiet Title with respect to a certain parcel of real estate and in support thereof avers as follows:

1. Plaintiff(s) is/are:

2. Defendant(s) is/are:

3. The real estate, which is the subject of this litigation is:

**A copy of the legal description is contained within the deed conveying the property to the Plaintiff, which is attached hereto.**

4. State the cause of action in detail:

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court find in his/her favor and against the Defendant(s), and enter a judgment ordering the Recorder of Deeds for Philadelphia County to convey the property located at:

to the Plaintiff(s), upon presentment of an order stating the same; and granting such other relief as is necessary and appropriate.

Respectfully submitted:

\_\_\_\_\_  
Plaintiff

\_\_\_\_\_  
Plaintiff

Date: \_\_\_\_\_

**NAME OF FILING PARTY:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

**THIS IS NOT AN  
ARBITRATION CASE**

	:	PHILADELPHIA COUNTY
	:	COURT OF COMMON PLEAS
	:	TRIAL DIVISION - CIVIL
Plaintiff	:	
	:	
vs.	:	_____ TERM, _____
	:	
	:	No. _____
	:	
	:	

**AFFIDAVIT OF PLAINTIFF**

**COMMONWEALTH OF PENNSYLVANIA** :

**COUNTY OF PHILADELPHIA** :

**ss.**

I, \_\_\_\_\_ (Plaintiff), being duly sworn according to law, depose and say that the facts stated herein are true and correct.

\_\_\_\_\_  
Plaintiff

\_\_\_\_\_  
Plaintiff



**VERIFICATION**

Plaintiff(s) \_\_\_\_\_

hereby verify that the statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief; I understand that these statements are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

\_\_\_\_\_  
Signature of Plaintiff

\_\_\_\_\_  
Signature of Plaintiff

Dated: \_\_\_\_\_