FRAUDULENT CONVEYANCE OUIET TITLE PACKAGE

An **action to quiet title** is a <u>lawsuit</u> brought in a <u>court</u> having <u>jurisdiction</u> over land disputes, in order to establish a party's title to <u>real property</u> 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 <u>fraudulent</u> <u>conveyance</u> of a property, perhaps by a forged deed or under <u>coercion</u>.

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

County Trial Division Civil Cover Sheet 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 NO. OF DEFENDANTS COMMENCEMENT OF ACTION TOTAL NUMBER OF PLAINTIFFS Complaint Petition Action Notice of Appeal Writ of Summons Transfer From Other Jurisdictions AMOUNT IN CONTROVERSY COURT PROGRAMS Arbitration Mass Tort Minor Court Appeal Settlement \$50,000.00 or less Savings Action Statutory Appeals Minors Jury More than \$50,000.00 Commerce (Completion of W/D/Survival Non-Jury Petition Addendum Required) 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 TO THE OFFICE OF JUDICIAL RECORDS: 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. E-MAIL ADDRESS DATE SIGNATURE

For Office of Judicial Records Use Only (Docket Number)

Court of Common Pleas of Philadelphia

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:

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.
- Commencement Type: Indicate type of document filed to commence the action.
- Amount in Controversy: Check the appropriate box.
- Court Program: Check the appropriate box.
- 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

Actions Commenced by Writ of Summons or Complaint

Minor Court		Conti	Contract		Professional Malpractice	
5M	Money Judgment	1C	Contract	2D	Dental	
5L	Landlord	1T	Construction	4L	Legal	
5D	Denial Open Default Judgment	10	Other:	2M	Medical	
5E	Code Enforcement	Tort		4Y	Other	
	Other:	2B	Assault and Battery	IG Su	brogation	
Local Agency		2L	Libel and Lander	Equit	y	
5B	Motor Vehicle Suspension-	4F	Fraud	E1	No Real Estate	
	Breathalizer	1J	Bad Faith	E2	Real Estate	
5V	Motor Vehicle Licenses,	2E	Wrongful Use of Civil Process	1D	Declaratory Judgment	
	Inspections, Insurance	Other	•	M1	Mandamus	
5C	Civil Service	Negli	gence	Real	Property	
5K	Philadelphia Parking Authority	2V	Motor Vehicle Accident	3R	Rent, Lease, Ejectment	
5Q	Liquor Control Board	2H	Other Traffic Accident	Q1	Quiet Title	
5R	Board of Revision of Taxes	1F	No Fault Benefits	3F	Mortgage Foreclosure	
5X	Tax Assessment Boards	4M	Motor Vehicle Property Damage	1L	Mechanics Lien	
5Z	Zoning Board	2F	Personal Injury – FELA	P1	Partition Prevent Waste	
52	Board of View	20	Other Personal Injury	1V	Replevin	
51	Other:	2S	Premise Liability – Slip & Fall	1H	Civil Tax Case – Complain	
Other:		2P	Product Liability	Other	:	
		2T	Toxic Tort			
Proceedings Commenced by Petition			T1 Asbestos			
8P	Appointment of Arbitrators		TZ DES			
8C	Name Change – Adult		T2 Implant			
8L	Compel Medical Examination	3E	Toxic Waste			

8M 8G Civil Tax Case - Petition Other:

Commerce Program

8F

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.

Statutory Basis for Cause of Action

Eminent Domain

Leave to Issue - Subpoena

Mental Health Proceedings

8E Election Matters

Forfeiture

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

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

Other:

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.

ACTION TO QUIET TITLE (FRAUDULENT CONVEYANCE)

NOTICE AVISO

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.

VS.

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, 11th Floor Philadelphia, Pennsylvania 19107 (215) 238-6333 Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificatión. 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 decider 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.

TERM,

No._____

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, 11th Floor Filadelfia, Pennsylvania 19107 (215) 238-6333

NAME OF FILING PARTY:		
Name:		
Address:		
City Chata 7im	THIS IS <u>NOT</u> AN	
City, State, Zip: Felephone:	ARBITRATION CASE	
reiephone.		
	: COURT OF COMMON PLEAS	
Plaintiff	: TRIAL DIVISION - CIVIL :	
VS.	: : TERM,	
	: : No	
	:	
	:	
	ON TO QUIET TITLE OULENT CONVEYANCE)	
(FRAUD	OLENI CONVETANCE)	
Plaintiff, hereby files this Complaint again	nst the Defendant to Quiet Title with respect to a	
certain parcel of real estate and in support ther	reof 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			
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:		
	Disinsiss		
	Plaintiff		
	Plaintiff		
Date:			

NAME OF FILING PARTY:		
Name:		
Address:		
	THIS IS <u>NOT</u> AN	
City, State, Zip:	ARBITRATION CASE	
Telephone:		
Plaintiff	: PHILADELPHIA COUNTY : COURT OF COMMON PLEAS : TRIAL DIVISION - CIVIL	
vs.	:TERM,	
	: No	
	: :	
AFFIDA COMMONWEALTH OF PENNSYLVANIA COUNTY OF PHILADELPHIA	AVIT OF PLAINTIFF : : ss. :	
I, (Plai	intiff), 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.			
penalties of 18 Fa.C.S. §4904, felating to unsworn	faisincation to authorities.		
	Signature of Plaintiff		
	Signature of Plaintiff		
Dated:			