

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

For Prothonotary Use Only (Docket Number)	
<b>MARCH 2016</b>	
E-Filing Number: 1603046669	<b>001647</b>
PLAINTIFF'S NAME CENTRO INCORPORATED, ALIAS: D/B/A PHILADELPHIA CATHOLIC WORKER	DEFENDANT'S NAME MAYRONE, LLC
PLAINTIFF'S ADDRESS 430 JEFFERSON STREET PHILADELPHIA PA 19122	DEFENDANT'S ADDRESS 2144 MOUNT CARMEL AVENUE GLENSIDE PA 19038
PLAINTIFF'S NAME	DEFENDANT'S NAME PYRAMID TIRE & RUBBER CO.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1333-35 NORTH 5TH STREET PHILADELPHIA PA
PLAINTIFF'S NAME	DEFENDANT'S NAME ELLIOT FIELDS
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 3944 W. GRENSHAW ST. CHICAGO IL 60624
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 4
COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:
CASE TYPE AND CODE Q1 - QUIET TITLE	
STATUTORY BASIS FOR CAUSE OF ACTION	
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	<p style="text-align: center;"><b>FILED                  PROPROTHY                  MAR 18 2016                  C. MALVESTUTO</b></p>
IS CASE SUBJECT TO COORDINATION ORDER? YES      NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>CENTRO INCORPORATED</u> Papers may be served at the address set forth below.	
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY GEORGE E. RAHN	ADDRESS SAUL EWING LLP CENTRE SQUARE WEST 1500 MARKET ST. 38TH FLOOR PHILADELPHIA PA 19102
PHONE NUMBER (215) 972-7165	FAX NUMBER (215) 972-1855
SUPREME COURT IDENTIFICATION NO. 19566	E-MAIL ADDRESS nrahn@saul.com
SIGNATURE OF FILING ATTORNEY OR PARTY GEORGE RAHN	DATE SUBMITTED Friday, March 18, 2016, 10:44 am

**COMPLETE LIST OF DEFENDANTS:**

1. MAYRONE, LLC  
2144 MOUNT CARMEL AVENUE  
GLENSIDE PA 19038
2. PYRAMID TIRE & RUBBER CO.  
1333-35 NORTH 5TH STREET  
PHILADELPHIA PA
3. ELLIOT FIELDS  
3944 W. GRENSHAW ST.  
CHICAGO IL 60624
4. ARLENE ZITIN  
21 E. HURON STREET APT. 2303  
CHICAGO IL 60611

SAUL EWING LLP  
By: George E. Rahn, Jr.  
Attorney I.D. No. 19566  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102-2186  
Telephone: 215-972-7165  
Facsimile: 215-972-1855  
Email: [nrahn@saul.com](mailto:nrahn@saul.com)

THE PUBLIC INTEREST LAW CENTER  
By: Amy Laura Cahn  
Attorney I.D. No. 306762  
1709 Ben Franklin Parkway, Second Floor  
Philadelphia, PA 19103  
Telephone: 267-546-1306  
Facsimile: 215-627-3183  
Email: [acahn@pubintl.org](mailto:acahn@pubintl.org)

---

CENTRO INCORPORATED, d/b/a  
PHILADELPHIA CATHOLIC WORKER  
430 Jefferson Street  
Philadelphia, PA 19122,

Plaintiff,

v.

MAYRONE, LLC,  
2144 Mount Carmel Avenue  
Glenside, PA 19038,

PYRAMID TIRE & RUBBER CO.  
1333-35 North 5th Street  
Philadelphia, PA,

ARLENE ZITIN  
21 E. Huron Street, Apt. 2303  
Chicago, IL 60611-3878

and

Attorneys for plaintiff  
Centro Incorporated, doing business as  
Philadelphia Catholic Worker



PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
CIVIL TRIAL DIVISION

MARCH TERM, 2016

NO.



## 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 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 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 19107-2911  
Telephone: (215) 238-6333

## AVISO

Lo(a) 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 comparecencia 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 SUFICIENTEMENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN 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  
Philadelphia, Pennsylvania 19107-2911  
Teléfono: (215) 238-6333

SAUL EWING LLP  
By: George E. Rahn, Jr.  
Attorney I.D. No. 19566  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102-2186  
Telephone: 215-972-7165  
Facsimile: 215-972-1855  
Email: [nrahn@saul.com](mailto:nrahn@saul.com)

Attorneys for plaintiff  
Centro Incorporated, doing business as  
Philadelphia Catholic Worker

THE PUBLIC INTEREST LAW CENTER  
By: Amy Laura Cahn  
Attorney I.D. No. 306762  
1709 Ben Franklin Parkway, Second Floor  
Philadelphia, PA 19103  
Telephone: 267-546-1306  
Facsimile: 215-627-3183  
Email: [acahn@pubintlaw.org](mailto:acahn@pubintlaw.org)

---

CENTRO INCORPORATED, d/b/a  
PHILADELPHIA CATHOLIC WORKER  
430 Jefferson Street  
Philadelphia, PA 19122,

Plaintiff,

v.

MAYRONE, LLC,  
2144 Mount Carmel Avenue  
Glenside, PA 19038,

PYRAMID TIRE & RUBBER CO.  
1333-35 North 5th Street  
Philadelphia, PA,

ARLENE ZITIN  
21 E. Huron Street, Apt. 2303  
Chicago, IL 60611-3878

and

PHILADELPHIA COUNTY  
COURT OF COMMON PLEAS  
CIVIL TRIAL DIVISION

MARCH TERM, 2016

NO.

ELLIOT FIELDS  
3944 W. Grenshaw Street  
Chicago, IL 60624-4217,

Defendants.

**COMPLAINT**

**CIVIL ACTION-QUIET TITLE**

1. This is an action to quiet title to that certain piece of real property in the City and County of Philadelphia denominated as 428-438 West Master Street, Philadelphia, Pennsylvania, 19122 (the "Property"). The Property consists of four parcels. The legal description of the four parcels is set forth as Exhibit "A," which is incorporated as though set forth more fully herein.

2. Plaintiff Centro Incorporated, is a Pennsylvania business corporation located at 430 Jefferson Street, Philadelphia, Pennsylvania, 19122. Centro Incorporated, does business as Philadelphia Catholic Worker (collectively "Philadelphia Catholic Worker").

3. Philadelphia Catholic Worker is an independent organization dedicated to serving the citizens in its North Philadelphia community. Among other activities, Philadelphia Catholic Worker provides an after school program for children in the community, operates a food and clothing distribution program, and conducts a summer youth program.

4. Defendant Mayrone, LLC is a Pennsylvania limited liability corporation with an address of 2144 Mount Carmel Avenue, Glenside, Pennsylvania. On information and belief, Mayrone is in the business of developing real estate.

5. Defendant Pyramid Tire & Rubber Co. is a corporation incorporated under the laws of the Commonwealth of Pennsylvania. On information and belief, Pyramid Tire & Rubber Co. has been inactive since 1956.

6. On information and belief, defendant Arlene Zitin is a co-executor of the estate of Emma Fields, the last surviving beneficial owner of Pyramid Tire & Rubber Co.

7. Also on information and belief, defendant Elliott Fields is a co-executor of the estate of Emma Fields, the last surviving beneficial owner of Pyramid Tire & Rubber Co.

8. Venue lies in this Court, because this action stems from occurrences that took place in Philadelphia County and concerns real property located in Philadelphia County pursuant to Pa. R.C.P. 1063.

9. According to the last recorded deed to the Property, dated January 5, 2016, and recorded on February 10, 2016, in Philadelphia County, as Document No. 53021731, Mayrone is the last owner of record of the Property. A copy of the deed is attached as Exhibit "B" and is incorporated as though set forth more fully herein.

10. Before January 5, 2016, the owner of the four parcels that make up the Property was listed as Pyramid Tire & Rubber Co. Pyramid Tire & Rubber Co. took title to the four parcels that make up the Property in 1952 and 1958. Pyramid was record owner of the Property until January of 2016.

11. In and before 1987, Philadelphia Catholic Worker maintained a home that served the Kensington neighborhood at 430 Jefferson Street in Philadelphia, Pennsylvania, one block from the Property. In 1987, Philadelphia Catholic Worker decided to establish a garden on the Property, which was by then a vacant lot. Philadelphia Catholic Worker decided to use the Property to establish a community garden to grow vegetables and other produce for sale and use in the neighborhood, which would further the community's needs and remove the negative impact of the Property.



12. As of 1987, there was no activity on the Property. The Property had long been used as an unauthorized dumping site and contained bricks, concrete and other construction debris, as well as trash from the surrounding neighborhood. There was also evidence that there had been a fire on the Property, but there had never been an attempt to clear or clean the space. From all appearances, the Property had been abandoned.

13. Before it could begin gardening, Philadelphia Catholic Worker had to clean the Property and dispose of the waste and debris. To complete this process, Philadelphia Catholic Worker enlisted assistance from neighbors and volunteers from Saint Joseph's University. In addition, Philadelphia Catholic Worker hired a construction company, which brought heavy equipment, including a backhoe and a large dumpster.

14. In 1988, Philadelphia Catholic Worker planted the first garden. In order to operate the garden, Philadelphia Catholic Worker had to obtain a source for water and proper soil. Plaintiff was granted permission through permits to use a local fire hydrant to water the garden. Representatives of Fairmount Park brought top-soil to the property so that the soil would sustain the plants in the garden. In addition, Philadelphia Catholic Worker built a white wooden fence around the garden to alert others of the existence of the garden and to keep out unwanted trespassers.

15. Philadelphia Catholic Worker has had a garden on the Property every year since 1988. Periodically until 2012, representatives of Fairmount Park brought needed soil or compost to the Property. Now, the garden is supplied with compost produced at the garden.

16. In or around 1992, Philadelphia Green made a grant to Philadelphia Catholic Worker to build a metal fence for the Property. This fence currently surrounds the property.

17. During the course of the operation of the garden, Philadelphia Catholic Worker has divided the Property into lots for use by volunteers and has granted permission to neighbors and others to work and plant portions of the garden.

18. In 2012, various neighborhood representatives formed an organization called La Finquita, which was intended to enhance participation at the garden and step up food production by creating a small market farm and farm stand. Philadelphia Catholic Worker has permitted La Finquita to operate on the Property.

19. In or around 1997, Philadelphia Catholic Worker built a shed on the Property to store gardening tools. In 2010, Philadelphia Catholic Worker allowed La Finquita to build a brick patio on the property. These improvements remain on the Property.

20. Until 2013, Philadelphia Catholic Worker used local fire hydrants to water the garden and obtained permits from the City of Philadelphia Water Department. In 2013, with the permission of Philadelphia Catholic Worker, the La Finquita gardeners obtained a grant from an organization called Gardens for Good to install a water line at the Property so that there would be an independent source of water.

21. Philadelphia Catholic Worker divided the Property into approximately 20 lots. There are now approximately 40 people who volunteer and work in Philadelphia Catholic Worker's garden. There is a waitlist for lots in the garden.

22. During the time that Philadelphia Catholic Worker has been in possession of the Property, the garden has produced a large array of vegetables and other produce, including corn, tomatoes, cucumbers, squash, peas, turnips, broccoli, lettuce, a variety of herbs, and a host of other vegetables. The vegetables are currently used to supply food for a soup kitchen operated

by Philadelphia Catholic Worker at its place of business. In addition, La Finquita operates a Sunday market, which offers affordable and nutritious food to the community.

23. Philadelphia Catholic Worker claims title to the Property by virtue of its continuous, open, and notorious possession of the Property exclusively and adverse to all other persons having any claim or interest therein, including defendant Mayrone.

24. Plaintiff's claim for title to the Property by adverse possession is more than 21 years old, which is the period for title by adverse possession under Pennsylvania law, according to the statute of limitations recited in 42 Pa. Cons. Stat. Ann. § 5530(a)(1) that limits a claim for possession of real property to 21 years.

25. Philadelphia Catholic Worker has never had any direct contact with Mayrone. And at no time did defendant Mayrone or its predecessor owner of record Pyramid Tire & Rubber Co. give Philadelphia Catholic Worker permission to continue working and operating a garden on the Property.

26. Philadelphia Catholic Worker has, over many years, placed locks on the entrance to the Property to protect the garden and prevent potential vandalism. In January of 2016, an unknown third party cut the locks on the garden and replaced them with new locks, for which Philadelphia Catholic Worker did not have keys. In addition, an unknown third party has recently placed a "no trespassing" sign on the fence. These acts constitute a trespass on Philadelphia Catholic Worker's property.

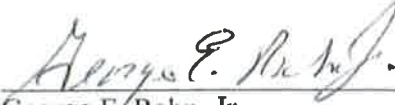
27. On or about March 2, 2016, Philadelphia Catholic Worker discovered that a deed had been filed with the Philadelphia Recorder of Deeds relating to the Property. The deed, which is dated January 5, 2016, purports to convey the Property from what are referred to as the beneficial owners of Pyramid Tire Rubber Co. to defendant Mayrone, LLC. The deed was

signed by defendants Arlene Zitin (by her agent Elliott Fields) and Elliott Fields, who are described as co-executors of the Estate of Emma Fields, the last surviving beneficial owner of Pyramid Tire & Rubber Co. This deed is a nullity and without legal effect as a result of Philadelphia Catholic Worker's ownership of the property by virtue of adverse possession.

WHEREFORE, plaintiff Centro Incorporated, doing business as Philadelphia Catholic Worker, prays as follows:

1. For a decree of this Court determining all adverse claims of defendant Mayrone, LLC and all persons claiming under it.
2. For said decree to declare and adjudge that Centro Incorporated, owns absolutely and is entitled to the quiet and peaceful possession of the Property and that defendant Mayrone, LLC and all persons claiming under it have no estate, right, title, lien, or interest in or to said premises, and that title to the Property be to Centro Incorporated, against all claims of defendant Mayrone, LLC and all persons claiming under it.
3. That Pyramid Tire & Rubber Co., Arlene Zitin and Elliott Fields had no estate right, title or interest in the Property as of January 5, 2016 and any purported transfer or conveyance of the Property to Mayrone, LLC is null and void and of no legal effect.
4. For said decree to direct the Recorder of Deeds of Philadelphia County to execute the deed attached as Exhibit "C" on behalf of Mayrone, LLC so that the deed can be recorded to properly reflect Centro Incorporated, sole's ownership of the Property.
5. For an order barring defendant Mayrone, LLC from trespassing on the property or interfering in any way with plaintiff's ownership and enjoyment of the Property.

6. For the costs of this action and for such other and further relief that the Court may deem necessary and proper.



George E. Rahn, Jr.  
Attorney I.D. No. 19566  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102-2186  
Telephone: 215-972-7165  
Facsimile: 215-972-1855  
Email: [nrahn@saull.com](mailto:nrahn@saull.com)

Amy Laura Cahn  
Attorney I.D. No. 306762  
The Public Interest Law Center  
1709 Ben Franklin Parkway, Second Floor  
Philadelphia, PA 19103  
Telephone: 267-546-1306  
Facsimile: 215-627-3183  
Email: [acahn@pubintlaw.org](mailto:acahn@pubintlaw.org)

Attorneys for plaintiff  
Centro Incorporated, d/b/a  
Philadelphia Catholic Worker

Dated: March 18, 2016

# EXHIBIT A

**PREMISES A**

**ALL THAT CERTAIN** lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master St., in the 17th Ward, City of Philadelphia, Southwest corner of Lawrence St.

CONTAINING in front 21'6" x 47 feet on Lawrence Street.

BEING 428 West Master Street.

**PREMISES B**

**ALL THAT CERTAIN** lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master Street 21'6" West of Lawrence Street in the 17th Ward, of the City of Philadelphia.

CONTAINING in front 18'6" x 47 feet.

BEING 430 Master Street.

**PREMISES C**

**ALL THAT CERTAIN** lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master St. 40' West of Lawrence Street, 17th Ward City of Philadelphia.

CONTAINING in front on Master Street, 20' x 47 feet.

BEING 432 Master Street.

**PREMISES D**

**ALL THOSE TWO CERTAIN** lots or pieces of ground with the buildings and improvements thereon erected.

SITUATE in the Seventeenth Ward of the City of Philadelphia; ONE THEREOF, on the South side of Master Street at the distance of Sixty feet Westward from the West side of Lawrence Street;

CONTAINING in front or breadth on said Master Street Twenty-five feet and extending of that width in length or depth Southward between lines parallel with the said Lawrence Street, Sixty-seven feet; BOUNDED Eastward by ground now or late of Mathias Royser Southward by ground now or late of the Estate of Turner Camac, deceased, Westward by ground now or late of Elizabeth Lecamion and Northward by Master Street aforesaid; AND THE REMAINING OTHER THEREOF, on the Southside of Master Street at the distance of One Hundred feet Eastward from the East side of Fifth Street; CONTAINING in front or breadth on the said Master Street Twenty-two feet and extending of that width in length or depth Southward between parallel lines at right angles to the said Master Street Sixty-seven feet; BOUNDED Northward by the said Master Street, Southward by ground now or late of Turner Camac, Eastward by ground now or late of Edward W. Wilson, and Westward by ground now or late of John Schickling.

ALL TOGETHER, BEING known as 434, 436 and 438 Master Street.

AND Premises situate on the West side of Lawrence St. 17 feet South of Master Street in the 17th Ward. Containing in front 20 feet x 60 feet.

Being No. 1342 Lawrence St.



# EXHIBIT B

Prepared by and Return to:

Mobile Settlement Services, Inc.  
1005 Pontiac Dr.  
PMB 302  
Drexel Hill, Pa 19026  
610-789-3636

File No. MSS-2365

BRT # 182316710

**This Indenture**, made the 5<sup>th</sup> day of January, 2016

Between

**ARLENE ZITIN (BY HER AGENT ELLIOT FIELDS by Power of Attorney dated 12/29/15 and intending to be recorded herewith) AND ELLIOT FIELDS CO-EXECUTORS OF THE ESTATE OF EMMA FIELDS LAST SURVIVING BENEFICIAL OWNER OF PYRAMID TIRE & RUBBER CO., (A PENNSYLVANIA CORPORATION)**

(hereinafter called the Grantor), of the one part, and

**MAYRONE, LLC**

(hereinafter called the Grantee), of the other part,

Witnesseth that in consideration of the sum off **Thirty Thousand And 00/100 Dollars (\$30,000.00)**, in hand paid, the receipt whereof is hereby acknowledged, the said Grantor does hereby grant and convey unto the said Grantee, its successors and assigns,

Street Address: **428-438 Master St., Philadelphia, PA 19122**

**PREMISES A**

**ALL THAT CERTAIN** lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master St., in the 17<sup>th</sup> Ward, City of Philadelphia, Southwest corner of Lawrence St.

CONTAINING in front 21' 6" x 47 feet on Lawrence Street.

BEING 428 West Master Street.

**PREMISES B**

**ALL THAT CERTAIN** lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master Street 21' 6" West of Lawrence Street in the 17<sup>th</sup> Ward, of the City of Philadelphia.

CONTAINING in front 18'6" x 47 feet.

BEING 430 Master Street.

**PREMISES C**

**ALL THAT CERTAIN** lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master St. 40' West of Lawrence Street, 17<sup>th</sup> Ward City of Philadelphia.

CONTAINING in front on Master Street, 20'x47 feet

BEING 432 Master Street.

**PREMISES D**

**ALL THOSE TWO CERTAIN** lots or pieces of ground with the buildings and improvements thereon erected.

**SITUATE** in the Seventeenth Ward of the City of Philadelphia; **ONE THEREOF**, on the South side of Master Street at the distance of Sixty feet Westward from the West side of Lawrence Street;

CONTAINING in front or breadth on said Master Street Twenty-five feet and extending of that width in length or depth Southward between lines parallel with the said Lawrence Street, Sixty-seven feet; **BOUNDED** Eastward by ground now or late of Mathias Royser Southward by ground now or late of the Estate of Turner Camac, deceased, Westward by ground now or late of Elizabeth Lecamion and Northward by Master Street aforesaid; **AND THE REMAINING OTHER THEREOF**, on the Southside of Master Street at the distance of One Hundred feet Eastward from the East side of Fifth Street; CONTAINING in front or breadth on the said Master Street Twenty-two feet and extending of that width in length or depth Southward between parallel lines at right angles to the said Master Street Sixty-seven feet; **BOUNDED** Northward by the said Master Street, Southward by ground now or late of Turner Camac, Eastward by ground now or late of Edward W. Wilson, and Westward by ground now or late of John Schickling.

**ALL TOGETHER**, BEING known as 434, 436 and 438 Master Street.

**AND** Premises situate on the West side of Lawrence St. 17 feet South of Master Street in the 17<sup>th</sup> Ward. Containing in front 20 feet x 60 feet.

Being No. 1342 N. Lawrence St.

**PREMISES A**

**BEING** the same premises which William M. Lennox, sheriff, by Sheriff's Deed dated July 28, 1952, and recorded August 6, 1952, in the Office of the Recorder of Deeds in and for the County of Philadelphia, Pennsylvania, in Book MLS 172, Page 213, granted and conveyed unto Pyramid Tire & Rubber Co., in fee.

**PREMISES B**

**BEING** the same premises which William M. Lennox, sheriff, by Sheriff's Deed dated July 2, 1952, and recorded July 2, 1952, in the Office of the Recorder of Deeds in and for the County of Philadelphia, Pennsylvania, in Book MLS 145, Page 7, granted and conveyed unto Pyramid Tire & Rubber Co., in fee.

**PREMISES C**

**BEING** the same premises which William M. Lennox, sheriff, by Sheriff's Deed dated July 28, 1952, and recorded August 5, 1952, in the Office of the Recorder of Deeds in and for the County of Philadelphia, Pennsylvania, in Book MLS 172, Page 329, granted and conveyed unto Pyramid Tire & Rubber Co., in fee.

**PREMISES D**

**BEING** the same premises which Irving Wasserman and Bessie Wasserman, his wife, by deed dated February 7, 1956, and recorded February 8, 1956, in the Office of the Recorder of Deeds in and for the County of Philadelphia, Pennsylvania, in Book CAB 223, Page 76, granted and conveyed unto Pyramid Tire & Rubber Co., (a Pa Corp.) in fee.

AND also being the same premises which Secretary of Banking receiver in possession of Stanley Milton Building and Loan Association granted and conveyed to Pyramid Tire & Rubber Co. on 6/23/1958 in 217 Sub of 73-74

And the Said Pyramid Tire & Rubber Co., became inactive in 1956 whereby there were 2 beneficial owners, Frank Fields and Emma Fields.

Whereas Frank Fields departed this life 10/2/1990 whereby leaving Emma Fields as last surviving beneficial owner.

Whereas Emma Fields departed this life 10/6/1992 leaving a last will and testament, which was filed in Chicago Illinois, W#92w88887 naming Elliot Fields and Arleen Zitkin, co-executors of her estate on 10-12-1992. Exemplified copy of the will recorded in the Register of Wills, Philadelphia County on

N/A in # N/A

Taken subject to the taxes due @ \$60,000. to be paid by February 28, 2016.

Together with all and singular the buildings, improvements, ways, waters, water-courses, driveways, rights, liberties, hereditaments and appurtenances, whatsoever thereunto belonging, or in anywise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of the said Grantor, in law, equity, or otherwise howsoever, of, in, and to the same and every part thereof.



To have and to hold the said buildings with the hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said Grantee, its successors and assigns, to and for the only proper use and behoof of the said Grantee, its successors and assigns, forever.


And the said, Executor of the aforesaid covenants, promises and agrees to and with said Grantee, its heirs and assigns, that he/she, the said Executor of the aforementioned, has not done, committed, or knowingly or willingly suffered to be done or committed, any act, matter or thing whatsoever whereby the premises hereby granted, or any part thereof, is, are, shall or may be impeached, charged or encumbered, in title, charge, estate, or otherwise howsoever.

In Witness Whereof, the said Grantor caused these presents to be duly executed the day and year first above written.

**Sealed and Delivered  
in the Presence of Us:**

ARLENE ZITIN (BY HER AGENT ELLIOT  
FIELDS) AND ELLIOT FIELDS CO-EXECUTORS  
OF THE ESTATE OF EMMA FIELDS LAST  
SURVIVING BENEFICIAL OWNER OF  
PYRAMID TIRE & RUBBER CO., (A  
PENNSYLVANIA CORPORATION)


By:   {SEAL}  
ARLENE ZITIN (BY HER AGENT ELLIOT  
FIELDS), CO-EXECUTRIX

By:  {SEAL}  
ELLIOT FIELDS, CO-EXECUTOR

Commonwealth of Pennsylvania }  
County of Philadelphia } ss

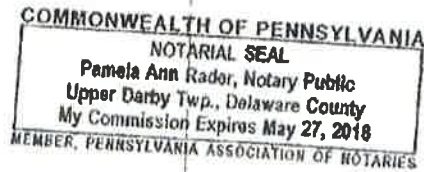
On this, the 5<sup>th</sup> day of January, 2016, before me, the undersigned Officer, a Notary Public in and for the jurisdiction aforesaid, personally appeared Elliot Fields, executor and as agent for Arlene Zitin co-executrix known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he/she executed the same in the capacity therein stated and for the purposes therein contained.

I hereunto set my hand and official seal.

  
\_\_\_\_\_  
Notary Public  
My commission expires \_\_\_\_\_

The precise residence and the complete post office address of the above-named Grantee is:

P.O. Box 281  
Lansdale PA 19038



\_\_\_\_\_  
On behalf of the Grantee

# Deed

BRT # 182316710

Arlene Zitin (by her agent Elliot Fields) and  
Elliot Fields co-Executors of the Estate of  
Emma Fields last surviving beneficial owner  
of Pyramid Tire & Rubber Co., (a  
Pennsylvania Corporation)

TO

Mayrone, LLC

Mobile Settlement Services, Inc.

1005 Pontiac Dr.

PMB 302

Drexel Hill, Pa 19026

Telephone: 610-789-3636 Fax: 610-957-5331

**REALTY TRANSFER TAX STATEMENT OF VALUE**

See reverse for instructions.

State Tax Paid	
Book Number	
Page Number	
Date Recorded	

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

**A. CORRESPONDENT - All inquiries may be directed to the following person:**

Name <b>Mobile Settlement Services, Inc.</b>		Telephone Number: <b>( 610 ) 789-3636</b>	
Mailing Address <b>1005 Pontiac Dr., PMB 302</b>		City <b>Drexel Hill</b>	State ZIP Code <b>PA 19026</b>

**B. TRANSFER DATA**

Date of Acceptance of Document <b>01 / 05 / 2016</b>			
Grantor(s)/Lessor(s) <b>Pyramid Tire &amp; Rubber Co.</b>	Telephone Number:	Grantee(s)/Lessee(s) <b>Mayrone, LLC</b>	Telephone Number:
Mailing Address <b>428-438 Master St.</b>		Mailing Address <b>PO Box 281</b>	
City <b>Philadelphia</b>	State ZIP Code <b>PA 19122</b>	City <b>Lansdale</b>	State ZIP Code <b>PA 19038</b>

**C. REAL ESTATE LOCATION**

Street Address <b>428-438 Master St.</b>		City, Township, Borough <b>Philadelphia City</b>	
County <b>Philadelphia</b>	School District <b>Philadelphia</b>	Tax Parcel Number <b>182316710</b>	

**D. VALUATION DATA**

Was transaction part of an assignment or relocation?  Y  N

1. Actual Cash Consideration <b>30,000.00</b>	2. Other Consideration <b>+ 60000.00</b>	3. Total Consideration <b>= 90,000.00</b>
4. County Assessed Value <b>69,000.00</b>	5. Common Level Ratio Factor <b>X 1.01</b>	6. Fair Market Value <b>= 69,690.00</b>

**E. EXEMPTION DATA - Refer to instructions for exemption status.**

1a. Amount of Exemption Claimed <b>\$ 0</b>	1b. Percentage of Grantor's Interest in Real Estate <b>100 %</b>	1c. Percentage of Grantor's Interest Conveyed <b>100 %</b>
--	---	---

**2. Check Appropriate Box Below for Exemption Claimed.**

- Will or intestate succession.
- Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- Transfer from a trust. Date of transfer into the trust \_\_\_\_\_ (Name of Decedent) \_\_\_\_\_ (Estate File Number)
- If trust was amended attach a copy of original and amended trust.
- Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- Other (Please explain exemption claimed.) \_\_\_\_\_

Under penalties of law, I declare that I have examined this statement, including accompanying information, and the best of my knowledge and belief, it is true, correct and complete.

nature of Correspondent or Responsible Party

Mobile Settlement Services, Inc., By:

Date

January 5, 2016

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.



# PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION

BOOK NO. PAGE NO.

DATE RECORDED

CITY TAX PAID

Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/value is/ is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).

**A. CORRESPONDENT — All inquiries may be directed to the following person:**

NAME: **Mobile Settlement Services, Inc.** TELEPHONE NUMBER: AREA CODE **(610) 789-3636**  
 STREET ADDRESS: **1005 Pontiac Dr., PMB 302** CITY: **Drexel Hill** STATE: **PA** ZIP CODE: **19026**

**B. TRANSFER DATA**

GRANTOR(S)/LESSOR(S): **Pyramid Tire & Rubber Co., (a Pennsylvania Corporation)** DATE OF ACCEPTANCE OF DOCUMENT: **January 5, 2016**  
 GRANTEE(S)/LESSEE(S): **Mayrone, LLC**  
 STREET ADDRESS: **428-438 Master St.** STREET ADDRESS: **PO Box 281**  
 CITY: **Philadelphia** STATE: **PA** ZIP CODE: **19122** CITY: **Lansdale** STATE: **PA** ZIP CODE: **19038**

**C. PROPERTY LOCATION**

STREET ADDRESS: **428-438 Master St.** CITY, TOWNSHIP, BOROUGH: **Philadelphia City**  
 COUNTY: **Philadelphia** SCHOOL DISTRICT: **Philadelphia** TAX PARCEL NUMBER: **182316710**

**D. VALUATION DATA**

1. ACTUAL CASH CONSIDERATION <b>30,000.00</b>	2. OTHER CONSIDERATION + <b>60,000.00</b>	3. TOTAL CONSIDERATION = <b>90,000.00</b>
4. COUNTY ASSESSED VALUE <b>69,000.00</b>	5. COMMON LEVEL RATIO FACTOR X <b>1.01</b>	6. FAIR MARKET VALUE = <b>69,690.00</b>

**E. EXEMPTION DATA**

1A. AMOUNT OF EXEMPTION: **0** 1B. PERCENTAGE OF INTEREST CONVEYED: **100**

**2. Check Appropriate Box Below for Exemption Claimed**

- Will or Intestate succession (NAME OF DECEDENT) (ESTATE FILE NUMBER)
- Transfer to Industrial Development Agency.
- Transfer to agent or straw party. (Attach copy of agency/straw party agreement).
- Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ \_\_\_\_\_
- Transfers to the Commonwealth, the United States, and Instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).
- Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number \_\_\_\_\_, Page Number \_\_\_\_\_  
Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).
- Corrective deed (Attach copy of the prior deed).
- Other (Please explain exemption claimed, if other than listed above.) \_\_\_\_\_

Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY

**Mobile Settlement Services, Inc., By:**

DATE

**January 5, 2016**

# EXHIBIT C

**Prepared By:**  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102

**When recorded, return to:**  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102

**OPA# 18-2316710**

---

**SPECIAL WARRANTY DEED**

**THIS DEED** is made the \_\_\_\_\_ day of \_\_\_\_\_, 2016 between **Mayrone, LLC**, a Pennsylvania limited liability company (hereinafter called the Grantor), of the one part, and **Centro Incorporated, d/b/a Philadelphia Catholic Worker**, a Pennsylvania non-profit corporation (hereinafter called the Grantee), of the other part.

**WITNESSETH**, that the Grantor, for and in consideration of the sum of **One Dollar (\$1.00)** lawful money of the United States of America, unto it well and truly paid by the Grantee, at or before the sealing and delivery hereof, the receipt whereof is hereby acknowledged, has granted, bargained and sold, released and confirmed, and by these presents does grant, bargain and sell, release and confirm unto the Grantee, its successors and assigns,

**PREMISES A**

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master St., in the 17th Ward, City of Philadelphia, Southwest corner of Lawrence St.

CONTAINING in front 21'6" x 47 feet on Lawrence Street.

**BEING 428 West Master Street.**

**PREMISES B**

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master Street 21'6" West of Lawrence Street in the 17th Ward, of the City of Philadelphia.

CONTAINING in front 18'6" x 47 feet.

**BEING 430 Master Street.**

**PREMISES C**

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected.

On the South side of Master St. 40' West of Lawrence Street, 17th Ward City of Philadelphia.

CONTAINING in front on Master Street, 20' x 47 feet.

**BEING 432 Master Street.**

**PREMISES D**

ALL THOSE TWO CERTAIN lots or pieces of ground with the buildings and improvements thereon erected.

SITUATE in the Seventeenth Ward of the City of Philadelphia; ONE THEREOF, on the South side of Master Street at the distance of Sixty feet Westward from the West side of Lawrence Street;

CONTAINING in front or breadth on said Master Street Twenty-five feet and extending of that width in length or depth Southward between lines parallel with the said Lawrence Street, Sixty-seven feet; BOUNDED Eastward by ground now or late of Mathias Royser Southward by ground now or late of the Estate of Turner Camac, deceased, Westward by ground now or late of Elizabeth Lecamion and Northward by Master Street aforesaid; AND THE REMAINING OTHER THEREOF, on the Southside of Master Street at the distance of One Hundred feet Eastward from the East side of Fifth Street; CONTAINING in front or breadth on the said Master Street Twenty-two feet and extending of that width in length or depth Southward between parallel lines at right angles to the said Master Street Sixty-seven feet; BOUNDED Northward by the said Master Street, Southward by ground now or late of Turner Camac, Eastward by ground now or late of Edward W. Wilson, and Westward by ground now or late of John Schickling.

**ALL TOGETHER, BEING known as 434, 436 and 438 Master Street.**

AND premises situate on the West side of Lawrence Street 47 feet (erroneously described as 17 feet in previously recorded deed) South of Master Street in the 17th Ward.

Containing in front 20 feet x 60 feet.

**Being No. 1342 Lawrence St.**

**BEING** the same premises which Arlene Zitin (by her agent Elliot Fields by Power of Attorney dated 12/29/15) and Elliott Fields, Co-executors of the Estate of Emma Fields last surviving beneficial owner of Pyramid Tire & Rubber Co., a Pennsylvania corporation, by Deed dated January 5, 2016 and recorded in the Philadelphia Department of Records on February 10, 2016 as Document No. 53021731, granted and conveyed unto Mayrone, LLC, a Pennsylvania limited liability company, in fee.

**UNDER AND SUBJECT** to all covenants, conditions, restrictions, easements, rights of way and reservations of record, to the extent valid, subsisting and enforceable.

**TOGETHER** with all and singular the buildings, improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights, liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in any wise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of it, the Grantor, in law, equity, or otherwise howsoever, of, in and to the same and every part thereof.

**TO HAVE AND TO HOLD** the said lot or piece of ground above described with the buildings and improvements thereon erected, hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the Grantee, its successors and assigns, to and for the only proper use and behoof of the Grantee, its successors and assigns forever.

**UNDER AND SUBJECT**, as aforesaid.

**AND** the Grantor, for itself and its successors and assigns, does covenant, promise and agree, to and with the Grantee, its successors and assigns, by these presents, that it, the Grantor, and its successors and assigns, all and singular the hereditaments and premises hereby granted or mentioned and intended so to be, with the appurtenances, unto the Grantee, its successors and assigns, against the Grantor and its successors and assigns, and against all and every person and persons whomsoever lawfully claiming or to claim the same or any part thereof, by, from or under it or any of them, shall and will, subject as aforesaid, **WARRANT** and forever **DEFEND**.



**Certification of Address**

I hereby certify that the mailing address of the within-named Grantee is:

430 Jefferson Street  
Philadelphia, PA 19122

---

On behalf of the Grantee

**VERIFICATION**

Phoebe Centz, being duly sworn according to law, deposes and says that she is the president of Centro Incorporated, that she is authorized to execute this verification on its behalf, that the facts set forth in the foregoing complaint are true and correct to the best of her knowledge, information, and belief, and she understands that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
Phoebe Centz

Dated: March 11, 2016