

**IN THE COURT OF  
COMMON PLEAS OF  
ALLEGHENY COUNTY,  
PENNSYLVANIA  
CIVIL DIVISION  
NO. GD 23-008638**

IN RE: CONDEMNATION BY THE : PENNSYLVANIA TURNPIKE COMMISSION : OF PROPERTY LOCATED IN THE : NO. GD 23-008638 BOROUGH OF DRAVOSBURG, COUNTY : OF ALLEGHENY, COMMONWEALTH OF : PENNSYLVANIA, FOR THE CONSTRUCTION : IN REM OF THE MON-FAYETTE EXPRESSWAY, : PA ROUTE 51 to I-376 PROJECT, : A TOTAL TAKE : EMINENT DOMAIN (BLOCK AND LOT NO. 310-G-375): CONDEMNES: GLENWOOD AND DRAVOSBURG ELECTRIC STREET RAILWAY COMPANY, a Pennsylvania business corporation, its successors and assigns, as its interests may appear; and ELMIRA P. RISHER, SARAH C. SNODGRASS, JOHN M. RISHER, STEPHEN S. CRUMP AND MARY J. RISHER, their heirs, successors in interest and assigns, as their interests may appear

**NOTICE OF PRESENTATION**

Kindly take notice that the within Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession will be presented to the Civil Motions Judge, Court of Common Pleas of Allegheny County, Pennsylvania, Courtroom No. 703, 414 Grant Street, Pittsburgh, PA 15219 on Friday, September 29, 2023 at 9:30 AM, or as soon as thereafter meets the convenience of the Court.

Respectfully, /s/ Robert J. Wratcher

Robert J. Wratcher, Esquire

**PETITION TO DEPOSIT  
ESTIMATED JUST  
COMPENSATION  
AND OBTAIN A WRIT OF  
POSSESSION**

The Pennsylvania Turnpike Commission files this Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession pursuant to the Eminent Domain Code of 2006, Act of May 4, 2006, P.L. 112, No. 34, §1, 26 Pa.C.S. §101 et seq and respectfully declares the following: 1. The Pennsylvania Turnpike Commission, an instrumentality of the Commonwealth of Pennsylvania, with its principal office at Exit 247 of the Pennsylvania Turnpike system located in Lower Swatara Township, Dauphin County, Pennsylvania. Its post office address is P.O. Box 67676, Harrisburg, Pennsylvania, 17106-7676. 2. On July 17, 2023, a Declaration of Taking was filed at the above caption, term and number by the Pennsylvania Turnpike Commission to obtain, inter alia: (a) an 0.811 acre fee simple interest as required right-of-way for limited access; (b) 1.037 acres in fee simple as required right of way; and (c) 0.025 acres as required private access easement, a total take, situated in the Borough of Dravosburg, Allegheny County, Pennsylvania for the construction of the Mon-Fayette Expressway, Route 51 to I-376 Project.

3. On August 4, 2023, the Condemnees were given required notice by posting of the property pursuant to 26 P.S. §305(b)(2). 4. The Pennsylvania Turnpike Commission has estimated the Just Compensation for the taking of the condemned property to be Eight Thousand and No/100 Dollars (\$8,000.00). 5. The Pennsylvania Turnpike Commission has offered to pay the Estimated Just Compensation directly to the Condemnees. 6. The Condemnees cannot be located to accept payment of the Estimated Just Compensation.

7. Upon Payment of the Estimated Just Compensation to the Department of Court Records by the Pennsylvania Turnpike Commission, it is requested that this Honorable Court grant the Pennsylvania Turnpike Commission a Writ of Possession for the condemned property as described in the Declaration of Taking. 8. I, Robert J. Wratcher, Esquire, Counsel for the Pennsylvania Turnpike Commission do hereby propose, swear and affirm that I am authorized to and do hereby execute this Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession on behalf of the Pennsylvania Turnpike Commission, and the averments set forth herein are true and correct to the best of my knowledge, information and belief, and are made subject to the penalties provided in 18 Pa. C.S. §4904. WHEREFORE, Condemnor, the Pennsylvania Turnpike Commission, respectfully requests that this Honorable Court direct payment of the aforesaid Estimated Just Compensation into the Prothonotary, to be held until further Order of Court directing payment of said amount to the Condemnees and to persons entitled thereto pursuant to 26 Pa. C.S.A. §307 and further issue a Writ of Possession to the Condemnor, Pennsylvania Turnpike Commission for entry onto such condemned property. Respectfully submitted,

PENNSYLVANIA TURNPIKE COMMISSION

By: /s/ Robert J. Wratcher Robert J. Wratcher, Esquire

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**ORDER OF COURT**

AND NOW, this \_\_\_ day of \_\_\_\_\_, 2023, upon presentation of the within Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession, it is hereby ORDERED that the sum of Eight Thousand and No/100 Dollars (\$8,000.00), representing the amount of Estimated Just Compensation due to the Condemnees be paid into the Department of Court Records to be held in a non-interest bearing account until further Order of Court directing payment of said amount to the Condemnees or persons entitled thereto pursuant to the Pennsylvania Eminent Domain Code. IT IS FURTHER ORDERED that upon payment of the Estimated Just Compensation into the Prothonotary, a Writ of Possession shall issue to The Pennsylvania Turnpike Commission for all real property identified and described in the Declaration of Taking. BY THE COURT: