

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

Plaintiff(s)

Vs

No. _____ of _____ C.A.

Defendant(s)

COMPLAINT REGARDING CUSTODY

1. The Plaintiff(s) herein is/are as follows:

Name Address County

2. The Defendant(s) herein is/are as follows:

Name Address County

3. Plaintiff(s) seek(s) an Order of Court regarding the custody of the following children:

Child's Name Date of Birth Age Born out of wedlock?

4. For the past five years the children have resided at the following addresses with the following persons, starting with the present:

<u>Child's Name</u>	<u>Approximate Dates</u>	<u>Address</u>	<u>Resided With</u>
	from _____ to present	_____	_____
	from _____ to _____	_____	_____
	from _____ to _____	_____	_____
	from _____ to _____	_____	_____
	from _____ to _____	_____	_____

5. The name, address, and marital status (married, divorced, or single) of the mother of each child is as follows:

<u>Child's Name</u>	<u>Mother</u>	<u>Address</u>	<u>Marital Status</u>

6. The name, address, and marital status (married, divorced, or single) of the father of each child is as follows:

<u>Child's Name</u>	<u>Father</u>	<u>Address</u>	<u>Marital Status</u>
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7. The relationship of each Plaintiff to each child is as follows:

<u>Child's Name</u>	<u>Plaintiff's Name</u>	<u>Relationship to Child</u>
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8. The relationship of each Defendant to each child is as follows:

<u>Child's Name</u>	<u>Defendant's Name</u>	<u>Relationship to Child</u>
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9. Each Plaintiff currently resides with the following persons:

<u>Plaintiff's Name</u>	<u>Resides With</u>	<u>Relationship to Plaintiff</u>
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10. Each Defendant currently resides with the following persons:

<u>Defendant's Name</u>	<u>Resides With</u>	<u>Relationship to Defendant</u>
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11. Other litigation concerning the custody of the children is described as follows: (If none, so state):

<u>Court's Name & Location</u>	<u>Docket Number</u>	<u>Name of Plaintiffs</u>	<u>Name of Defendants</u>	<u>Still Pending?</u>
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12. A copy of the following Court Orders concerning the custody of the children are attached to this Complaint (If none, so state):

<u>Name & Location of Court</u>	<u>Date of Court Order</u>
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13. Each parent whose parental rights to the children have not been terminated and the persons who have physical custody of the children have been named as parties to this action. All other persons who are known to have or to claim custodial or visitation rights with respect to the children are named below as "Interested Persons" and will be served with a copy of the within pleading and are hereby informed of their right to intervene in this action:

<u>Names of Interested Persons</u>	<u>Address</u>	<u>Basis of Claim</u>
_____	_____	_____
_____	_____	_____

14. The best interest and permanent welfare of the children will be served by granting the relief requested because the Plaintiff(s) is/are willing and able to provide a loving, nurturing environment and Plaintiff(s) is/are **grandparents** who: (**Please mark with an "X" each that apply):

- _____ (1) who have genuine care and concern for the child;
- _____ (2) whose relationship with the child began with the consent of a parent of the child **OR**
- _____ whose relationship with the child began pursuant to an Order of Court; **AND**
- _____ (3) who for 12 months has assumed the role and responsibilities of the child's parent, providing for the physical, emotional and social needs of the child, **OR**
- _____ who assumes the responsibility for a child who has been determined to be a dependent child pursuant to 42 Pa. C.S. Ch. 63 (relating to juvenile matters), **OR**
- _____ who assumes or deems it necessary to assume responsibility for a child who is substantially at risk due to parental abuse, neglect, drug or alcohol abuse or mental illness.

WHEREFORE, Plaintiff(s) respectfully request(s) that this Court grant unto the Plaintiff(s) the following type of **Legal Custody** (check one):

- _____ Full Legal Custody of the following children: _____
- _____ Shared Legal Custody of the following children: _____

And the following type of **Physical Custody** (check one):

- _____ Primary Physical Custody of the following children: _____
- _____ Shared Physical Custody of the following children: _____
- _____ Partial Physical Custody of the following children: _____

I verify that the statements made in this Complaint are true and correct to the best of my ability. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

Date

Plaintiff's Signature

Date

Plaintiff's Signature

INSTRUCTIONS FOR THE PLAINTIFF:
Complete the Plaintiff/Defendant lines.
Complete the area *** with the child(ren) names.
The Court will complete the remaining information.

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No. _____ of _____ C.A.

Defendant(s)

ORDER OF COURT AND NOTICE TO APPEAR

AND NOW this _____ day of _____, 20____, upon consideration to the attached Complaint Regarding Custody, a conference is hereby scheduled in said matter on the _____ day of _____, 20____, at _____ o'clock ____M. in Courtroom No. _____, of the Lawrence County Government Center in New Castle, Pennsylvania.

The Defendant(s) is/are hereby notified as follows:

YOU, the above named Defendant(s) have been sued in court regarding custody of the following children:

*** _____
*** _____
*** _____
*** _____

YOU are ORDERED to appear in person for a conference at the above stated date, time, and place. At the Conference, the Court will determine who should pay the Court costs in this matter.

If you fail to appear as provided by the Order, an Order for Custody, Partial Custody, or Supervised Visitation may be entered against you or the Court may issue a warrant for your arrest.

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.

Lawyer Referral
Lawrence County Government Center
New Castle, Pennsylvania 16101
Telephone: (724) 656-1921

AMERICANS WITH DISABILITIES ACT OF 1990

The Court of Common Pleas of Lawrence 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 at 724-658-2541. All arrangements must be made at least 72 hours prior to any hearing or business before the court. You must attend the scheduled conference or hearing.

BY THE COURT:

JUDGE