

IN THE COURT OF COMMON PLEAS OF CARBON COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

PLAINTIFF
VS.

DEFENDANT

:
:
:
:
:
:
:
:
:
:

CUSTODY
NO.

COMPLAINT FOR CUSTODY

1. The plaintiff is _____ residing at _____
(Street) (City) (Zip Code) (County)
2. The defendant is _____ residing at _____
(Street) (City) (Zip Code) (County)
3. Plaintiff seeks (shared legal custody) (sole legal custody) (partial physical custody) (primary physical custody) (shared physical custody) (sole physical custody) (supervised physical custody) of the following child(ren):

<u>NAME</u>	<u>PRESENT RESIDENCE</u>	<u>AGE</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

The child(ren) (was) / (was not) born out of wedlock.

The child(ren) is presently in the custody of _____(Name)
who resides at _____
(Street) (City) (State)

During the past five years, the child(ren) has resided with the following persons and at the following addresses:

<u>(List all Persons)</u>	<u>(List all Addresses)</u>	<u>(Dates)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

A parent of the child(ren) is _____,
currently residing at _____

This parent is (married) / (divorced) / (single).

A parent of the child(ren) is _____,
currently residing at _____

This parent is (married) / (divorced) / (single).

4. The relationship of plaintiff to the child(ren) is that of _____.

The plaintiff currently resides with the following persons:

<u>NAME</u>	<u>RELATIONSHIP</u>
_____	_____
_____	_____
_____	_____

5. The relationship of defendant to the child(ren) is that of _____.

The defendant currently resides with the following persons:

<u>NAME</u>	<u>RELATIONSHIP</u>
_____	_____
_____	_____
_____	_____

6. Plaintiff (has) / (has not) participated as a party or witness, or in another capacity, in other litigation concerning the custody of the child in this or another court. The court, term and number, and its relationship to this action is:
_____.

Plaintiff (has) / (has no) information of a custody proceeding concerning the child(ren) pending in a court of this Commonwealth or any other state. The court, term and number, and its relationship to this action is:
_____.

Plaintiff (knows) / (does not know) of a person not a party to the proceedings who has physical custody of the child(ren) or claims to have custodial rights with respect to the child(ren). The name and address of such person is:

_____.

7. The best interest and permanent welfare of the child(ren) will be served by granting the relief requested because (set forth facts showing that the granting of the relief requested will be in the best interest and permanent welfare of the child(ren)).

_____.

8. Each parent whose parental rights to the child(ren) have not been terminated and the person who has physical custody of the child(ren) have been named as parties to this action. All other persons, named below, who are known to have or claim a right to custody of the child(ren) will be given notice of the pendency of this action and the right to intervene:

<u>NAME</u>	<u>ADDRESS</u>	<u>BASIS OF CLAIM</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

9. (a) If the plaintiff is a grandparent who is not in loco parentis to the child and is seeking physical and/or legal custody pursuant to 23 Pa.C.S. §5323, you must plead facts establishing standing pursuant to the 23 Pa.C.S. §5324(3).

_____.

(b) If the plaintiff is a grandparent or great-grandparent who is seeking partial physical custody or supervised physical custody pursuant to 23 Pa.C.S. §5325, you must plead facts establishing standing pursuant to §5325.

(c) If the plaintiff is a person seeking physical and/or legal custody pursuant to 23 Pa.C.S. §5324(2) as a person who stands in loco parentis to the child, you must plead facts establishing standing.

10. Plaintiff has attached the Criminal Record/Abuse History Verification form required pursuant to Pa.R.C.P. No. 1915.3-2.

Wherefore, Plaintiff requests the court to grant (shared legal custody) (sole legal custody) (partial physical custody) (primary physical custody) (shared physical custody) (sole physical custody) (supervised physical custody) of the child(ren).

(Attorney for Plaintiff) (Plaintiff)

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

Plaintiff