

IN THE COURT OF COMMON PLEAS OF THE FIFTY-NINTH  
JUDICIAL DISTRICT OF PENNSYLVANIA

\_\_\_\_\_,  
Plaintiff

vs.

\_\_\_\_\_,  
Defendant

\* COUNTY BRANCH – ELK / CAMERON  
\*  
\*  
\* CIVIL  
\*  
\*  
\* NO. \_\_\_\_\_

**COMPLAINT FOR CUSTODY, PARTIAL CUSTODY AND/OR VISITATION**

1. The plaintiff is \_\_\_\_\_,  
Name  
\_\_\_\_\_, residing at \_\_\_\_\_,  
Age Street  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.  
City County State/Zip

2. The defendant is \_\_\_\_\_,  
Name  
\_\_\_\_\_, residing at \_\_\_\_\_,  
Age Street  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.  
City County State/Zip

3. Plaintiff seeks **custody** **partial custody** **visitation** (circle one) of the following children:

Name	Present Residence	Age
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

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

The child(ren) is/are presently in the custody of

\_\_\_\_\_, \_\_\_\_\_,  
Name Relationship to child(ren)  
residing at \_\_\_\_\_,  
Street  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
City County State/Zip

During the past five (5) years, the child(ren) has/have resided with the following persons and at the following addresses:

List all persons	List all addresses	Dates
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

The mother of the child(ren) is \_\_\_\_\_,  
Name  
\_\_\_\_\_, residing at \_\_\_\_\_,  
Age Street  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
City County State/Zip

She is \_\_\_\_\_ (married) (divorced) (single).

The father of the child(ren) is \_\_\_\_\_,  
Name  
\_\_\_\_\_, residing at \_\_\_\_\_,  
Age Street  
\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
City County State/Zip

He is \_\_\_\_\_ (married) (divorced) (single).

4. The relationship of the plaintiff to the child(ren) is \_\_\_\_\_.

The plaintiff currently resides with the following persons:

Name	Relationship
_____	_____
_____	_____
_____	_____

5. The relationship of the defendant to the child(ren) is \_\_\_\_\_.

The defendant currently resides with the following persons:

Name	Relationship
_____	_____
_____	_____
_____	_____

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

Plaintiff \_\_\_\_\_(has) (has no) information of custody proceedings concerning the child(ren) pending in a court of this Commonwealth. The court, term and number, and its relationship to this action are:

\_\_\_\_\_

Plaintiff \_\_\_\_\_(knows) (does not know) of a person not a party to the proceedings who has physical custody of the child and claims to have custody or visitation rights with respect to the child. 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 (explain why you want custody, partial custody or visitation) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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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 or visitation of the child(ren) have been given notice of the pendency of this action and the right to intervene:

Name	Street, City, State/Zip	Basis of Claim
_____	_____	_____
_____	_____	_____
_____	_____	_____

9. Neither party is an eligible service member who is serving on active duty, other than active duty for training, for a period of 30 or more consecutive days, in support of a contingency operation as defined by 51 Pa.C.S.A. 4109(f).

Wherefore, the plaintiff requests the court to grant  
\_\_\_\_\_(custody) (partial custody) (visitation) of the child(ren).

\_\_\_\_\_  
Plaintiff's signature

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.A. §4904 relating to unsworn falsifications to authorities.

Date: \_\_\_\_\_  
\_\_\_\_\_  
Plaintiff's signature

v. 11/09