

, : In the Court of Common Pleas

Plaintiff : County, Pennsylvania

v. : Docket No.: _____

:

, : Civil Action - In Law

Defendant : In Divorce

COMPLAINT FOR CUSTODY

AND NOW, comes _____, and in support of this Complaint for Custody respectfully avers as follows:

1. Plaintiff is _____, an adult individual currently residing in _____ County, Pennsylvania.

2. Defendant is _____, an adult individual currently residing in _____ County, Pennsylvania.

3. Plaintiff seeks (check one) sole shared legal custody and (check one) sole primary shared physical custody of the following minor child(ren):

Name (Initials)	Current Address	DOB	Age

(hereinafter "the Child(ren)") were born:

within the sate of matrimony

out of wedlock

For the past five years, the Child(ren) have resided with the following person(s) at the following address(es):

Name	Address	Dates
		to:
		to:
		to:

The mother of the Child(ren) is _____, currently residing in _____
 . They are (choose one) single married.

The father of the Child(ren) is _____, currently residing in _____
 . They are (choose one) single married.

4. The relationship of Plaintiff to the Child(ren) is _____. In addition to the Child(ren), Plaintiff also resides with the following persons:

Name	Relationship

5. The relationship of Defendant to the Child(ren) is _____. In addition to the Child(ren), Defendant also 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 in this or another court.

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 proceeding who has physical custody of the child or claims to have custodial rights with respect to the child(ren).

7. The best interest and permanent welfare of the Child will be served by granting the relief requested.

8. Each parent whose parental rights to the Child have not been terminated and the person who has physical custody of the Child have been named as parties to this action.

9. Pursuant to Pa.R.C.P 1915.3-2, a true and correct copy of Plaintiff's Criminal Record and Abuse History Verification has been filed concurrently with this Complaint for Custody.

WHEREFORE, Plaintiff humbly requests that this Honorable Court award them (sole/shared) legal and (sole/primary/shared) physical custody of the Child(ren).

Respectfully submitted,

Dated:

Printed Name

Signature

Address

City, State, Zip Code