

IN THE COURT OF COMMON PLEAS
OF LEBANON COUNTY, PENNSYLVANIA

CIVIL ACTION – FAMILY DIVISION

	:	
Plaintiff	:	
vs.	:	No.
	:	
Defendant	:	

COMPLAINT FOR CUSTODY

1. The Plaintiff is _____ (name), residing at _____
_____ (address).

2. The Defendant is _____ (name), residing at _____
_____ (address).

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:

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

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

The child/ren (is) (are) presently in the custody of _____ (name) who resides at _____ (address).

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

(List all Persons)

(List all Addresses)

(Dates)

The mother of the child/ren is _____, currently residing at _____ (mother's address). She is (married) (divorced) (single).

The father of the child/ren is _____, currently residing at _____ (father's address). He is (married) (divorced) (single).

4. The relationship of the Plaintiff to the child/ren is that of _____. The Plaintiff currently resides with the following persons:

Name

Relationship

5. The relationship of the Defendant to the child/ren is that of _____. 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 is _____

_____.

Plaintiff (has) (has no) information of a custody proceeding concerning the child/ren pending in a court of this Commonwealth. 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 (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 have been given notice of the pendency of this action and the right to intervene:

Name	Address	Basis of Claim
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

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

WHEREFORE, Plaintiff respectfully requests the Court to grant (him)(her) (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.

By: _____
(Signature)

Printed Name (Plaintiff/Defendant)

(Address)

(Telephone No.)

Dated:_____

VERIFICATION

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 falsification to authorities.

(Signature) Plaintiff/Defendant

Dated: _____