

COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA  
CIVIL ACTION – FAMILY DIVISION

_____	:	
Plaintiff	:	
	:	
vs.	:	No.
	:	
_____	:	
Defendant	:	

NOTICE TO DEFEND AND CLAIM RIGHTS

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take prompt action. You are warned that if you fail to do so, the case may proceed without you and a decree of divorce annulment may be entered against you by the court. A judgment may also be entered against you for any other claim or relief requested in these papers by the plaintiff. You may lose money or property or other rights important to you, including custody or visitation of your children.

When the ground for the divorce is indignities or irretrievable breakdown of the marriage, you may request marriage counseling. A list of marriage counselors is available in the Office of the Prothonotary at the Lebanon County Courthouse, 400 S. Eighth Street, 1<sup>st</sup> Floor, Lebanon, Pennsylvania.

IF YOU DO NOT FILE A CLAIM FOR ALIMONY, DIVISION OF PROPERTY, LAWYER'S FEES OR EXPENSES BEFORE A DIVORCE OR ANNULMENT IS GRANTED, YOU MAY LOSE THE RIGHT TO CLAIM ANY OF THEM.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**MidPenn Legal Services**  
**513 Chestnut Street**  
**Lebanon, PA 17042**  
**(717) 274-2834**

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CIVIL ACTION – FAMILY DIVISION

\_\_\_\_\_  
Plaintiff  
vs. \_\_\_\_\_  
Defendant

:  
:  
:  
:  
:  
:  
:  
:

No.

COMPLAINT UNDER SECTION 3301 (c or d) OF THE DIVORCE CODE  
COUNT I

1. Plaintiff is \_\_\_\_\_, who currently resides at \_\_\_\_\_, since \_\_\_\_\_.
2. Defendant is \_\_\_\_\_, who currently resides at \_\_\_\_\_, since \_\_\_\_\_.
3. Plaintiff and/or Defendant has/have been a bona fide resident/residents in the Commonwealth of Pennsylvania for at least six months immediately previous to the filing of this Complaint.
4. The Plaintiff and Defendant were married on \_\_\_\_\_, in \_\_\_\_\_.
5. There have been no prior actions of divorce or for annulment between the parties except \_\_\_\_\_.
6. The marriage is irretrievably broken.

7. Plaintiff has been advised of the availability of counseling and the Plaintiff may have the right to request that the Court require the parties to participate in counseling.
8. Plaintiff requests the Court to enter a decree of divorce.

COUNT II – ALIMONY PENDENTE LITE

Paragraphs 1 through 8 of Plaintiff's Complaint are incorporated herein by reference as though set forth in full.

9. Plaintiff lacks sufficient property to provide for his/her reasonable means and is unable to support himself/herself through appropriate employment.
10. Plaintiff requires reasonable support to adequately maintain himself/herself in accordance with the standard of living established in the marriage.

WHEREFORE, Plaintiff requests your Honorable Court to enter an award of reasonable temporary alimony until final hearing.

\_\_\_\_\_  
Plaintiff

Dated: \_\_\_\_\_

VERIFICATION

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

\_\_\_\_\_  
Plaintiff

Dated: \_\_\_\_\_