

IN THE COURT OF COMMON PLEAS OF BEDFORD COUNTY, PENNSYLVANIA

_____	:	No. ____ for the year of _____
Plaintiff	:	
vs.	:	Civil Action – Law
	:	
_____	:	In Custody
Defendant	:	

COMPLAINT FOR CUSTODY

1. The plaintiff is \_\_\_\_\_, residing at \_\_\_\_\_ County.

2. The defendant is \_\_\_\_\_, residing at \_\_\_\_\_ County.

3. Plaintiff seeks ( ) shared legal custody ( ) sole legal custody and ( ) partial physical custody ( ) primary physical custody ( ) shared physical custody ( ) sole physical custody ( ) supervised physical custody of the following child(ren):

<u>Name (initials)</u>	<u>Present Residence</u>	<u>Age</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

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

The child(ren) is/are presently in the custody of \_\_\_\_\_ who resides at \_\_\_\_\_.

During the past five (5) years, the child(ren) has/have resided with the following person(s) and at the following address(es):

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

A parent of the child(ren) is \_\_\_\_\_, currently residing at \_\_\_\_\_, \_\_\_\_\_ County.

This parent is ( ) Married ( ) Divorced ( ) Single.

A parent of the child(ren) is \_\_\_\_\_, currently residing at \_\_\_\_\_, \_\_\_\_\_ County.

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 person(s):

<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 person(s):

<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(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 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 child(ren)'s best interest and permanent welfare will be served by granting the relief requested because (set forth facts showing that the granting of the relief requested will be in the child(ren)'s best interest and permanent welfare):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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 person(s), 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 seeking physical or legal custody of the child(ren) and is *in loco parentis* to the child, the plaintiff shall plead facts establishing standing under 23 Pa.C.S. § 5324(2).

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(b) If the plaintiff is a grandparent seeking physical or legal custody of the grandchild(ren) and is not *in loco parentis* to the child, the plaintiff shall plead facts establishing standing under 23 Pa.C.S. § 5324(3).

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(c) If the plaintiff is seeking physical or legal custody of the child(ren) and is not *in loco parentis* to the child(ren), the plaintiff shall plead facts establishing standing pursuant to 23 Pa.C.S. § 5324 (4) and (5).

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(d) If the plaintiff is a grandparent or great-grandparent seeking partial physical custody or supervised physical custody of the grandchild(ren) or great-grandchild(ren), the plaintiff shall plead facts establishing standing under 23 Pa.C.S. § 5325.

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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 and ( ) partial physical custody ( ) primary physical custody ( ) shared physical custody ( ) sole physical custody ( ) supervised physical custody of the child(ren).

#### CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

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. § 4904, relating to unsworn falsification to authorities.

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff's Signature