

IN THE COURT OF COMMON PLEAS OF FAYETTE COUNTY, PENNSYLVANIA  
CUSTODY

\_\_\_\_\_  
Plaintiff

No. \_\_\_\_\_

VS

\_\_\_\_\_  
Defendant

**COMPLAINT FOR CUSTODY**

1. The plaintiff is \_\_\_\_\_ (name), with an  
address of \_\_\_\_\_ PA  
(Street) (City) (State)  
\_\_\_\_\_  
(Zip Code) (County)

2. The defendant is \_\_\_\_\_ (name), with  
an address of \_\_\_\_\_ PA  
(Street) (City) (State)  
\_\_\_\_\_  
(Zip Code) (County)

3. Plaintiff is seeking: **(check one)**  shared legal custody  sole legal custody

4. Plaintiff is seeking: **(check one)**  partial physical custody  primary physical custody

shared physical custody  supervised physical custody

5. The name(s) of the child(ren) is/are:

| <u>Name</u> | <u>Current Address</u> | <u>Date of Birth</u> |
|-------------|------------------------|----------------------|
| _____       | _____                  | _____                |
| _____       | _____                  | _____                |
| _____       | _____                  | _____                |

6. The child(ren) were born out of wedlock YES OR NO

7. The child(ren) is/are presently in the custody of \_\_\_\_\_(name),  
who resides at \_\_\_\_\_  
(Street) (City) (State)

8. During the past five years, the child(ren) has/have resided with the following person(s) and at the following addresses:

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

9. The mother of the child(ren) is \_\_\_\_\_, currently residing at \_\_\_\_\_.

10. She is currently: (married) (divorced) (single).

11. The father of the child(ren) is \_\_\_\_\_, currently residing at \_\_\_\_\_.

12. He is currently: (married) (divorced) (single).

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

14. The plaintiff currently resides with the following persons:

| <u>Name</u> | <u>Relationship</u> |
|-------------|---------------------|
| _____       | _____               |
| _____       | _____               |
| _____       | _____               |

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

16. The defendant currently resides with the following persons:

| <u>Name</u> | <u>Relationship</u> |
|-------------|---------------------|
| _____       | _____               |
| _____       | _____               |
| _____       | _____               |

17. 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. If other litigation has occurred list the county court, term and case number, and its relationship to this action is: \_\_\_\_\_.

18. Plaintiff (has) (has not) information of a custody proceeding concerning the child(ren) pending in a court of this Commonwealth. If other litigation has occurred list the county court, term and case number, and its relationship to this action is: \_\_\_\_\_.

19. 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). If there is another person list the name and address of such person:

\_\_\_\_\_, \_\_\_\_\_  
(address)

20. The best interest and permanent welfare of the child(ren) will be served by granting the relief requested because (set forth facts showing why granting of this petition is in the **best interest** and **permanent welfare** of the **child(ren)**).

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21. Each parent whose parental rights to the child(ren) have not been terminated and the person who has physical custody of the child(ren) **MUST** be 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:

| <u>Name</u> | <u>Address</u> | <u>Basis of Claim</u> |
|-------------|----------------|-----------------------|
| _____       | _____          | _____                 |
| _____       | _____          | _____                 |
| _____       | _____          | _____                 |

NOTE: You must serve a copy of the Complaint for Custody on each person listed above or in accordance with Pa.R.C.P. No. 1930.4, **AND**, further, you **MUST** provide **proof of service** for each opposing party to Child Custody Services **BEFORE** the mediation conference can be scheduled.

22. Plaintiff has attached the Criminal Record/Abuse History Verification form required pursuant to Pa.R.C.P. No. 1915.3-2. **I UNDERSTAND THAT FAILURE TO DO SO WILL RESULT IN THIS ACTION BEING DISMISSED.**

**WHEREFORE**, Plaintiff requests the court to grant:

shared legal custody OR  sole legal custody;

**And**

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

\_\_\_\_\_  
Plaintiff or Attorney Signature

\_\_\_\_\_  
Plaintiff or Attorney Name (print)

\_\_\_\_\_ (Address)

\_\_\_\_\_ (Address)

\_\_\_\_\_ (Telephone)

#### 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.

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

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