

IN THE COURT OF COMMON PLEAS OF _____ COUNTY, PENNSYLVANIA

Plaintiff

No. _____

v. _____
Defendant

IN CUSTODY

COMPLAINT FOR CUSTODY

1. _____ plaintiff is _____ (name), residing at _____
(Street) (City) (State) (Zip Code) (County)

2. _____ defendant is _____ (name), residing at _____
(Street) (City) (State) (Zip Code) (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):

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

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

The child is presently **16** custody of **15** _____ (name)
who resides at _____ (address)
(Street) (City) (State)

During the past five years, the child has resided with the following persons and at the following addresses:

(List all **17**s) (List all Address **18** **19**)

21 mother of the child is **20** _____, currently residing at
22 _____.

She is (married)(divorced)(single) **23**

24 mother of the child/ren is **25** _____, currently residing at
25 _____.
He is (married) (divorced) (single) **26**

4. The relationship of plaintiff to the child is that of **26** _____.

The plaintiff currently resides with the following persons:

Name 27	Relation 28
_____	_____
_____	_____
_____	_____

5. The relationship of defendant to the child is that of **29** _____.

The defendant currently resides with the following persons:

Name 30	Relation 31
_____	_____
_____	_____

32

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 33 court. The court, term and number 34 its relationship to this action is _____.

Plaintiff (has)(has no) information of a custody proceeding concerning the child pending in a court of this Comm 35 th. The court, term and number, and its relationship to this action is: 36 _____

Plaintiff (knows)(does not know) of a person not a party to the proceedings who has physical custody of the child or claims to have custodial right 37 in respect to the child. The name and address of such person is: _____

7. The best interest and permanent welfare of the child will be served by granting the relief requested because (set forth facts showing that the granting of the relief requested will be in the best interest 38 permanent welfare of the child.

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. All other persons, named below, who are known to have or claim a right to custody of the child have been given notice of the pendency of this action and the right to intervene:

Name 39	Address 40	By 41 claim
_____	_____	_____
_____	_____	_____

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

