

IN THE COURT OF COMMON PLEAS OF \_\_\_\_\_ COUNTY, PENNSYLVANIA

_____	:	
Plaintiff	:	No. _____
	:	
v.	:	
	:	
_____	:	CUSTODY
Defendant	:	
	:	
_____	:	
Defendant	:	

**COMPLAINT FOR CUSTODY  
(Grandparents and Third Parties)**

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

2. The defendant is \_\_\_\_\_ (name), residing at  
\_\_\_\_\_  
(Street) (City) (State) (Zip Code) (County)

3. The defendant is \_\_\_\_\_ (name), residing at  
\_\_\_\_\_  
(Street) (City) (State) (Zip Code) (County)

4. 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</u>	<u>Address</u>	<u>Date of Birth</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

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

The child is presently in the custody of \_\_\_\_\_ (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:

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

The mother of the child is \_\_\_\_\_, currently residing at \_\_\_\_\_.

She is (married)(divorced)(single).

The father of the child is \_\_\_\_\_, currently residing at \_\_\_\_\_.

He is (married) (divorced) (single).

5. The relationship of plaintiff to the child is that of \_\_\_\_\_.

The plaintiff currently resides with the following persons:

<u>Name</u>	<u>Relationship</u>
_____	_____
_____	_____
_____	_____

6. The relationship of defendant to the child is that of \_\_\_\_\_.

The defendant currently resides with the following persons:

<u>Name</u>	<u>Relationship</u>
_____	_____
_____	_____
_____	_____

7. 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 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 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 or claims to have custodial rights with respect to the child. The name and address of such person is: \_\_\_\_\_

8. 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 and permanent welfare of the child. \_\_\_\_\_

9. 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:

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

10. (a) If the plaintiff is a grandparent who is seeking physical and/or legal custody pursuant to 23 Pa.C.S. §5324, 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. \_\_\_\_\_

11. I have 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.

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

\_\_\_\_\_  
Plaintiff's Name

\_\_\_\_\_ (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'

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