

IN THE COURT OF COMMON PLEAS OF _____ COUNTY, PENNSYLVANIA

Plaintiff

v. _____

Defendant

Defendant

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No. _____

CUSTODY

**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):

Name	Address	Date
14	15	16 th
_____	_____	_____
_____	_____	_____
17	_____	_____

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

The child is presently in the custody of 18 (name)
who resides at 19 (Street) 20 (City) 21 (State) (address)

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

List all Persons 20 List all Addresses 21 Dates 22

The mother 23 of the child is 24, currently residing at _____.

She is (married)(divorced)(single) 26.

The father of the child is 27, currently residing at _____.

He is (married)(divorced)(single) 29.

5. The relationship of plaintiff to the child is that of _____.

The plaintiff currently resides with the following persons:

<u>Name</u> <u>30</u>	<u>Relationship</u> <u>31</u>
_____	_____
_____	_____
_____	_____

6. The relationship of defendant to the child is that of _____ 32.

The defendant currently resides with the following persons:

<u>Name</u> <u>33</u>	<u>Relationship</u> <u>34</u>
_____	_____
_____	_____
_____ <u>35</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, 37 relationship to this action is 36.

Plaintiff (has)(has no) information of a custody proceeding concerning the child pending in a court of this 39 onwealth. The court, 38 d number, and its relationship to this action is: _____

Plaintiff (knows)(does not know) of a person 40 a party to the proceedings who has physical custody of the child or claims to have custody 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 41 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>42</u>	<u>Address</u> <u>43</u>	<u>Basis</u> <u>44</u>
_____	_____	_____
_____	_____	_____
<u>45</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. 46 (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 47 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.

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WHEREIN 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.

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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.

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Plaintiff'

Date: _____