

**IN THE COURT OF COMMON PLEAS FOR ADAMS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW**

Name	PLAINTIFF	:	
		:	
	vs.	:	CASE NO. _____
		:	
		:	ACTION IN CUSTODY
		:	
Name	DEFENDANT 1	:	
		:	
	and (if applicable)	:	
		:	
		:	
Name	DEFENDANT 2	:	

COMPLAINT FOR CUSTODY

If you believe the circumstances in your case require the Court's immediate attention, please check "Yes" in the box below. If not, please check "No":

Emergency Order Requested? Yes No

1. I, _____, Plaintiff, reside at
Name of Plaintiff

Address, including City, State, Zip and County

2. _____ is the mother, father, or _____
Defendant No. 1 Relationship

of the child(ren), and resides at _____
Address, including City, State, Zip and County

_____ is the mother, father, or _____ of the
Defendant No. 2 Relationship

child(ren), and resides at _____
Address, including City, State, Zip and County

3. (a) I seek (sole - shared) legal custody, and (primary - shared - partial - sole - supervised) physical custody of the following child(ren): (attach separate sheet if necessary)

Initials of Child 1	Year of Birth	
		Address
Initials of Child 2	Year of Birth	
		Address
Initials of Child 3	Year of Birth	
		Address
Initials of Child 4	Year of Birth	
		Address

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

3. (c) The child(ren) is/are presently in the custody of _____,
 who resides at _____.
Address, including City, State, Zip and County

3. (d) The child(ren) have lived in the following places, with the persons indicated during the last five (5) years: (attach separate sheet, if necessary)

Names of all persons with whom the child(ren) resided	Address, including County	Time period
Name of person(s) with whom the child has resided		Time Period
	<small>Address, including City, State, Zip and County</small>	
Name of person(s) with whom the child has resided		Time Period
	<small>Address, including City, State, Zip and County</small>	
Name of person(s) with whom the child has resided		Time Period
	<small>Address, including City, State, Zip and County</small>	

Name of person(s) with whom the child has resided _____ Time Period _____

Address, including City, State, Zip and County

Name of person(s) with whom the child has resided _____ Time Period _____

Address, including City, State, Zip and County

Name of person(s) with whom the child has resided _____ Time Period _____

Address, including City, State, Zip and County

Name of person(s) with whom the child has resided _____ Time Period _____

Address, including City, State, Zip and County

Name of person(s) with whom the child has resided _____ Time Period _____

Address, including City, State, Zip and County

3. (e) A parent of the child(ren) is _____, currently residing
Name
at _____.
Address, including City, State, Zip and County

This parent is (married - divorced - single).

3. (f) A parent of the child(ren) is _____, currently residing at
Name

Address, including City, State, Zip and County

This parent is (married - divorced - single).

4. The relationship of the Plaintiff to the child(ren) is that of _____.
State relationship to Child(ren)

The Plaintiff currently resides with the following persons:

_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)

5. The relationship of Defendant 1 to the child(ren) is that of _____.
State Relationship to Child(ren)

Defendant 1 currently resides with the following persons:

_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)

and, (if applicable),

The relationship of Defendant 2 to the child(ren) is that of _____.
State Relationship to Child(ren)

Defendant 2 currently resides with the following persons:

_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)
_____ Name	_____ State Relationship to Child(ren)

6. (a) Plaintiff (has) - (has not) participated as a party or witness, or in any other capacity, in other litigation concerning the child(ren) in this or another court. If Plaintiff has participated in other litigation, then provide information regarding the Court, Case Number and its relationship to this action.

6. (b) Plaintiff (has) - (has no) information of a custody proceeding concerning the child(ren) pending in a court of this Commonwealth or another state. If Plaintiff has information of a custody proceeding, then provide information regarding the Court, Case Number, and its relationship to this action.

6. (c) 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 Plaintiff knows of another such person, then provide the name(s) and address(es).

Name

Address, including City, State, Zip and County

Name

Address, including City, State, Zip and County

7. The child'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'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 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 will be given notice of the pendency of this action and right to intervene.

Name

Address, including City, State, Zip and County

Basis for Claim

Name

Address, including City, State, Zip and County

Basis for Claim

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

9. (b) If the plaintiff is a grandparent seeking physical or legal custody of a grandchild and is not *in loco parentis* to the child, the plaintiff shall plead facts establishing standing pursuant to 23 Pa.C.S. § 5325(3).

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

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

10. Request for Emergency Order

The following emergency situation requires immediate attention by the Court.

Describe this situation in detail:

11. Emergency Contact Information:

Plaintiff: _____

Telephone Number: _____

Defendant number 1: _____

Telephone Number: _____

Defendant number 2: _____

Telephone Number: _____

12. Plaintiff has attached the Criminal Record / Abuse History Verification form required pursuant to Pa.R.C.P. 1915.3-2.

FOR THESE REASONS, I request the Court (check all that apply):

- Grant me (sole - shared) legal custody of the child(ren).
- Grant me (primary - shared - partial - sole - supervised) physical custody of the child(ren).
- Allow _____ to have the child(ren) in his/her custody
Name
at the following times and on the following terms:

- Allow _____ to visit with the child(ren) while I am present.
Name
- Allow no custody or visitation because:

VERIFICATION

I verify that the statements made in the foregoing document are true and correct. I understand that false statements herein are made subject to the penalties of perjury of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: _____

Signature