

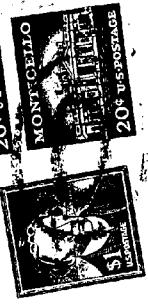
173
DOCKET NO. _____

NUMBER	TERM	YEAR
<u>306</u>	<u>November</u>	<u>1960</u>

Marina Danganan Pelton

VERSUS

Miles Earl Pelton, Jr.

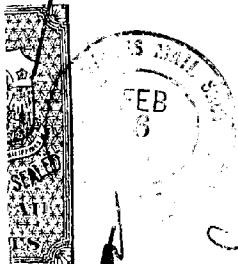


REGISTERED MAIL
RETURN RECEIPT REQUESTED
ADDRESSEE ONLY

Miles Earl Pelton, Jr.
318 Second Street
Meadville,
Pennsylvania
Postage Paid

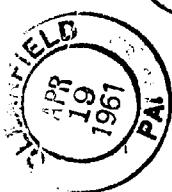
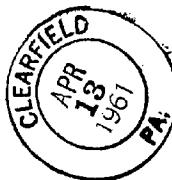
REGISTERED
1152

RETURN RECEIPT REQUESTED



OFFICE OF THE
Sheriff of Clearfield County
CLEARFIELD, PENNA.

P.T.
R.P.S.
Mr. [Signature]
1152



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MARINA DANGANAN PELTON,
Plaintiff

-vs-

MILES EARL PELTON, JR.,
Defendant

No. 306 November Term, 1960
IN DIVORCE

C O M P L A I N T

NOW COMES the Plaintiff, by her attorney, JOHN B. GATES, and brings this Complaint in Divorce against the above named MILES EARL PELTON, JR. upon a cause of action, whereof the following is a statement:

1. The name of the Plaintiff is MARINA DANGANAN PELTON, whose residence is c/o Mrs. Ping de Benito, 4858 Druid Los Angeles 32, California.

2. The name of the Defendant is MILES EARL PELTON, JR., a resident of Winburne, Cooper Township, Clearfield County, Pennsylvania, and temporarily residing at 318 Second Street, Marisal Village, Angeles, Pampanga, Philippines.

3. The Defendant is a resident of the Commonwealth of Pennsylvania and has been a bona fide resident of Clearfield County, Pennsylvania for more than one year.

4. The Plaintiff and the Defendant were married April 16, 1947 before Justice of the Peace of Makati, Rizal.

5. That the following named child was born to this marriage and is presently residing with the Defendant:

Marilyn Pelton, age 12 years.

6. The Defendant has:

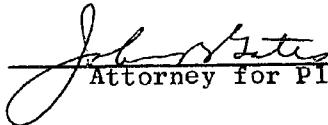
a. By cruel and barbarous treatment endangered the life of the Plaintiff, who is the innocent and injured spouse.

b. The defendant has committed adultery prior to the separation of the Plaintiff and the Defendant and continues to live with another woman in adultery, other than his wife, in the Republic of the Philippines.

7. That there is no collusion between the Plaintiff and the Defendant regarding this action.

8. The Defendant has heretofore applied for a divorce at No. 713 May Term, 1960 in the Court of Common Pleas of Clearfield County, Pennsylvania and also has filed an Action in the Court of First Instance of Pampanga, Fifth Judicial District, Branch No. 2, Civil Case No. 1846, for Declaration of Nullity of Marriage.

WHEREFORE, the Plaintiff respectfully prays your Honorable Court that she be granted an absolute divorce, separating herself from the said MILES EARL PELTON, JR., the Defendant, as if she had never been married, or as if the said Defendant were naturally dead.



John V. Gates
Attorney for Plaintiff

STATE OF CALIFORNIA
COUNTY OF *Los Angeles*

MARINA DANGANAN PELTON, being sworn according to law, deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief, and is not made out of levity or collusion.

X Marina Danganan Pelton
Marina Danganan Pelton

Sworn to and subscribed
before me this 6th day
of December, 1960.

L. Jacqueline LeBeau
Notary Public in and for
said County and State.

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. 306 November Term, 1960
IN DIVORCE

MARINA DANGANAN PELTON

VS

MILES EARL PELTON, JR.

C O M F L A I N T

TO WITNESS NAMED DEFENDANT:

You are hereby notified
to plead to the enclosed
Complaint within twenty (20)
days from the service here-
of.

JAMES B. GATES
Attorney for Plaintiff

By *John B. Gates*

FILED
DEC 27 1960

WM. T. HAGERTY
PROTHOMONOTARY
JOHN B. GATES
ATTORNEY-AT-LAW
CLEARFIELD, PA.

1/10/61
COMMUNICATOR PRINTING CO., CLEARFIELD, PA.

In the Court of Common Pleas of Clearfield County, Pa.

Marian D Pelton
vs
Miles E Pelton

No 306 Nov Term 1960
Complaint In Divorce
Notice By Registered Mail

* * * * * * * * * * * * * * * * * * * * * * * * * * * * * *
(Sheriff's Return)

Now, January 5, 1961 served the within Complaint In Divorce upon Miles E Pelton by sending by registered Mail, return receipt requested, addressee only, a true and attested copy of the original Complaint In Divorce to Miles E Pelton, 318 Second St, Marisel Village, Angeles, Pampanga, Philippines, that being his last known address, Registered letter marked "UNCLAIMED" is hereto attached and made part of this return of service.

Costs Sheriff Ammerman \$7.17
(Paid By Atty Gates)

So Answers,
Charles G. Ammerman
Charles G. Ammerman
Sheriff.

Sworn to before me this 25th
day of April 1961. A.D.

Wm. T. Haggerty

Prothonotary.

