

00-70-CD
MARY COBAUGH -vs- ROY D. VANSCOYOC, III

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH,
Plaintiff
-vs-
ROY D. VANSKOYOC, III,
Defendant

*
*
*
* No. 00-70-CD
*
*

Type of Action:
Divorce

Type of Pleading:
Complaint

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THERE ARE NO MINOR CHILDREN
BORN OF THIS MARRIAGE.

FILED

JAN 19 2000

William A. Shaw
Prothonotary

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
-vs- * No.
*
ROY D. VANSKOYOC, III, *
Defendant *

NOTICE TO DEFEND AND CLAIM RIGHTS

You have been sued in Court for:

<input checked="" type="checkbox"/> Divorce	<input type="checkbox"/> Annulment of Marriage
<input type="checkbox"/> Support (Child)	<input type="checkbox"/> Custody
<input type="checkbox"/> Division of Property	<input type="checkbox"/> Visitation
<input type="checkbox"/> Temporary Alimony	<input type="checkbox"/> Alimony
<input type="checkbox"/> Costs	<input type="checkbox"/> Attorney Fees

If you wish to defend against the claim set forth in the following pages, you must take prompt action. You are warned that if you fail to do so, the case may proceed without you and a decree of divorce or annulment may be entered against you by the Court. A judgment may also be entered against you for any other claim or relief requested in these papers by the Plaintiff. You may lose money or property or other rights important to you, including custody or visitation of your children.

When the ground for the divorce is indignities or irretrievable breakdown of the marriage, you may request marriage counseling. A list of marriage counselors is available in the Office of the Prothonotary of Clearfield County, Clearfield County Courthouse, Clearfield, Pennsylvania.

IF YOU DO NOT FILE A CLAIM FOR ALIMONY, DIVISION OF PROPERTY, LAWYER'S FEES OR EXPENSES BEFORE A DIVORCE OR ANNULMENT IS GRANTED, YOU MAY LOSE THE RIGHT TO CLAIM ANY OF THEM.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Second and Market Streets
Clearfield, PA 16830
(814) 765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
vs- * No.
*
ROY D. VANSOYOC, III, *
Defendant *

COMPLAINT

AND NOW, comes the Plaintiff, Mary Cobaugh, by and through her attorney, Richard H. Milgrub, Esquire, and files the following Complaint in Divorce:

1. Plaintiff is Mary Cobaugh, an adult individual, who currently resides at 822 Franklin Street, Johnstown, Pennsylvania.
2. Defendant is Roy D. VanSoyoc, III, an adult individual, who currently resides at RD, Houtzdale, Pennsylvania.
3. Plaintiff and Defendant have been bona fide residents of the Commonwealth of Pennsylvania for at least six months (6) immediately previous to the filing of this Complaint.
4. Plaintiff and Defendant were married on March 28, 1997 in Winchester, Virginia, by Martha L. Grimm, JP.
5. There have been no prior actions for divorce or annulment between the parties.
6. Plaintiff avers that she is entitled to a divorce on the ground that the marriage is irretrievably broken.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

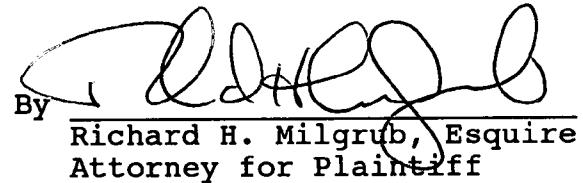
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109 NORTH BRADY STREET
DUBOIS, PA 15801

Furthermore, Plaintiff, the innocent and injured spouse, avers that Defendant, in violation of his marriage vows and the laws of the Commonwealth of Pennsylvania has committed such indignities to the person of the Plaintiff so as to make her condition intolerable and life burdensome. Finally, at the appropriate time, Plaintiff may submit an Affidavit alleging that the parties have lived separate and apart for at least two (2) years.

7. That the Plaintiff has been advised of the availability of counseling and further more, the Plaintiff has been advised of the right to request that the Court require the parties to participate in counseling.

8. This action is not collusive.

WHEREFORE, Plaintiff requests your Honorable Court to enter a Decree in Divorce, divorcing Plaintiff and Defendant.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

I, Mary Cobaugh, verify that the statements made in the Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Date: 1-15-00

Mary K Cobaugh

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

REC JAN 19 2000

WOMAN'S CATHY MILGRUB
William A. Shaw
Prothonotary

PD \$20.00

1cc cathymilgrub

RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

03/21/00 Document
Reinstated/Resigned to ~~State Attorney~~
for service. *W. A. Shaw*
Deputy Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH,
Plaintiff

*
*
*

-vs-

*
*

ROY D. VANSKOYOC, III,
Defendant

*
*

No. 00-70-CD

Type of Action:
Divorce

Type of Pleading:
Complaint

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

MAR 21 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

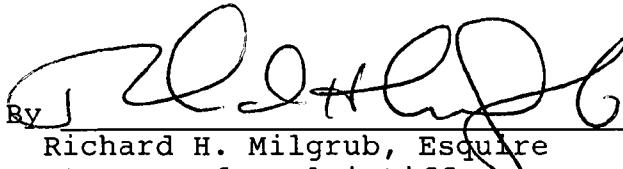
MARY COBAUGH, *
Plaintiff *
*
-vs- * No. 00-70-CD
*
ROY D. VANSCOYOC, III, *
Defendant *

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Please reinstate the Divorce Complaint filed in the
above-captioned matter.

Date: 3/21/00

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
109 NORTH BRADY STREET
DUBOIS, PA 15801

3-21-00 Document
Reinstated/Released to Sheriff/Attorney
for service.
Willie J. Miller
Deputy Prothonotary

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FILE

3-21-00
3-30/00 Atty. Milgrub
William A. Shaw
Prothonotary
Dd \$7.00

Reinstated to Atty.

Milgrub

E
RBL

RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *

-vs- *

ROY D. VAN SCOYOC, III, *
Defendant *

NO. 00-70-CD

Type of Action:
Divorce

Type of Pleading:

Affidavit of Service

Filed on Behalf of:

Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

FILED

MAR 31 2000

William A. Shaw
Prothonotary

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD, PENNSYLVANIA

MARY COBAUGH

PLAINTIFF
VS
DEFENDANT

ROY D. VANSOYOC, III.

* NO. 00-70-CD
*
*
*
*

AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA:

SS:

COUNTY OF CLEARFIELD

I, R. STUART AUBER, BEING FIRST DULY SWORN AND ACCORDING TO
LAW, DEPOSES AND SAYS:

1. THAT HE IS A CONSTABLE FOR THE COUNTY OF CLEARFIELD
AND THE STATE OF PENNSYLVANIA, AND NOT A PARTY TO THE
WITHIN ACTION.

2. THAT ON THE 30 DAY OF MAR, 2000, HE SERVED A
TRUE AND CORRECT COPY OF A COMPLAINT IN DIVORCE UPON
ROY D. VANSOYOC, III, AT FULLINGTON BUS CO.,
IN THE CITY, BORO, VILLAGE OF HOUTZDALE, TOWNSHIP OF
CLEARFIELD, COUNTY OF CLEARFIELD PENNSYLVANIA,
THE DEFENDENT NAMED IN SAID DOCUMENT, BY THEN AND THERE
AT THE PLACE AND AND ON THE DATE NOTED ABOVE, DELIVERED TO
ROY D. VANSOYOC, III A TRUE AND CORRECT COPY OF THE
SAID STATED DOCUMENTS. TIME OF THIS SERVICE WAS AT 1105
HOURS.

R. Stuart Auber
R. STUART AUBER, CONSTABLE
215 1/2 STATE STREET
CURWENSVILLE, PA 16833
(814) 236-1407

FILED

MAR 31 2000

3/10/00 CC
William A. Shaw
Prothonotary

RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
VITAL RECORDS

RECORD OF DIVORCE OR ANNULMENT				STATE FILE NUMBER
<input checked="" type="checkbox"/> (CHECK ONE) <input type="checkbox"/>				STATE FILE DATE
HUSBAND				
1. NAME Roy	(First) D. Vanscoyoc, III	(Middle)	(Last)	2. DATE OF BIRTH 8 4 " 65
2. RESIDENCE RD Houtzdale, Clearfield Co., PA	Street or R.D.	Cty, Boro, or Twp.	County	3. PLACE OF BIRTH PA
4. NUMBER OF THIS MARRIAGE 4	5. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	6. USUAL OCCUPATION bus driver
WIFE				
7. MAIDEN NAME Cobaugh	(First) Mary	(Middle) Kathryn	(Last) Cobaugh	8. DATE OF BIRTH 8 18 54
9. RESIDENCE 822 Franklin St., Johnstown, Cambria Co., PA	Street or R.D.	Cty, Boro, or Twp.	County	10. PLACE OF BIRTH PA
11. NUMBER OF THIS MARRIAGE 2	12. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	13. OCCUPATION caregiver
14. PLACE OF MARRIAGE Winchester,	15. COUNTRY Winchester,	16. STATE OR FOREIGN COUNTRY Virginia		17. DATE OF MARRIAGE 3 28 97
18. NUMBER OF CHILDREN BORN THIS MARRIAGE 0	19. NUMBER OF DEPENDENT CHILDREN BORN UNDER 18 n/a	20. PLAINTIFF HUSBAND <input type="checkbox"/>	WIFE <input checked="" type="checkbox"/>	21. DEGREE GRANTED TO HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>
22. NUMBER OF CHILDREN TO CUSTODY OF <input type="checkbox"/>	23. NUMBER OF HUSBAND WIFE SPLIT CUSTODY <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	24. OTHER (Specify) n/a	25. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT 3301(c)	26. DATE REPORT SENT TO VITAL RECORDS
27. SIGNATURE OF TRANSCRIBING CLERK 				

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH,
Plaintiff
- vs -
ROY D. VAN SCOYOC, III,
Defendant

*
*
*
* No. 00-70-CD
*
*
*

Type of Action:
Divorce

Type of Pleading:
Praecipe to Transmit
the Record

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

WAS
JUN 21 2000
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
- vs - * No. 00-70-CD
*
ROY D. VAN SCOYOC, III, *
Defendant *
*

PRAECIPE TO TRANSMIT RECORD

TO THE PROTHONOTARY:

Dear Sir:

Please transmit the record, together with the following information to the Court for entry of a Divorce Decree:

1. Ground for divorce: irretrievable breakdown of the marriage under Section 3301(c) of the Divorce Code.

2. Date and manner of service of the Complaint:

Served on the Defendant by constable the 30th day of March, 2000, at his place of employment, Fullington Auto Bus Company, Houtzdale, Pennsylvania.

3. Date of execution of the Affidavit of Consent required by Section 3301(c) of the Divorce Code: By Plaintiff on June 20, 2000 and by Defendant on June 20, 2000.

4. Date of execution of the Waiver of Notice required by Section 3301(c) of the Divorce Code: By Plaintiff on June 20, 2000 and by Defendant on June 20, 2000.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801


By _____
Richard H. Milgrub, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
- vs - * No. 00-70-CD
*
ROY D. VAN SCOYOC, III, *
Defendant *

AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under Section 3301(c) of the Divorce Code was filed on January 19, 2000.

2. The marriage of the Plaintiff and Defendant is irretrievably broken and ninety days have elapsed from the date of filing the Complaint.

3. I consent to the entry of a final Decree of Divorce.

4. I understand that I may lose rights concerning alimony, division of property, lawyer's fees or expenses if I do not claim them before a divorce is granted.

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

Date: 6/20/00

* Mary K. Cobough

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
- vs - * No. 00-70-CD
*
ROY D. VAN SCOYOC, III, *
Defendant *

AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under Section 3301(c) of the Divorce Code was filed on January 19, 2000.

2. The marriage of the Plaintiff and Defendant is irretrievably broken and ninety days have elapsed from the date of filing the Complaint.

3. I consent to the entry of a final Decree of Divorce.

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RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

Date: 6/20/00

Roy D. Van Scyoc

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
-vs- * No. 00-70-CD
*
ROY D. VANSOYOC, III, *
Defendant *

WAIVER OF NOTICE OF INTENTION TO REQUEST
ENTRY OF A DIVORCE DECREE UNDER
§3301(c) OF THE DIVORCE CODE

1. I consent to the entry of a final decree of divorce without notice.

2. I understand that I may lose rights concerning alimony, division of property, lawyer's fees or expenses if I do not claim them before a divorce is granted.

3. I understand that I will not be divorced until a divorce decree is entered by the Court and that a copy of the Decree will be sent to me immediately after it is filed with the Prothonotary.

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

Date: 6/20/00

Mary K. Cobaugh

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

MARY COBAUGH, *
Plaintiff *
*
-vs- * No. 00-70-CD
*
ROY D. VAN SCOYOC, III, *
Defendant *

**WAIVER OF NOTICE OF INTENTION TO REQUEST
ENTRY OF A DIVORCE DECREE UNDER
§3301(c) OF THE DIVORCE CODE**

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Date: 6/20/00

Roy Van Scyoc

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

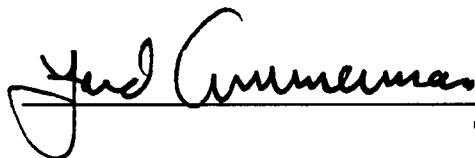
MARY COBAUGH, *
Plaintiff *
*
- vs - * No. 00-70-CD
*
ROY D. VAN SCOYOC, III, *
Defendant *
*

O R D E R

AND NOW, this 26 day of June, 2000,
Plaintiff having filed a Complaint in Divorce under the Divorce
Act on the 19th day of January, 2000, and reinstating it on March
21, 2000, and the parties having filed Affidavits of Consent
stating that the marriage of the Plaintiff and Defendant is
irretrievably broken and ninety days (90) have elapsed from the
date of the filing of the Complaint,

IT IS DECREED that MARY COBAUGH be divorced and
forever separated from the nuptial ties and bonds of matrimony
hereto contracted between herself and ROY D. VAN SCOYOC, III
thereupon all of the rights, duties or claims accruing to either
of said parties and pursuance of said marriage shall cease and
determine and each of them shall be at liberty to marry again as
though they had never been heretofore married.

BY THE COURT:



Judge

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

RICHARD H. MILGRUB

Attorney & Counsellor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830