

00-113-CD  
BETH ANN PENNINGTON -vs- ROBERT L. PENNINGTON

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

BETH ANN PENNINGTON  
Plaintiff

vs.

ROBERT L. PENNINGTON,  
Defendant

No. 00-113-20

**COMPLAINT IN DIVORCE**

Filed on behalf of

**Plaintiff**

Counsel of Record for this Party:

James N. Bryant, Esq.  
Attorney-At-Law  
PA I D. 14084

BRYANT & ASSOCIATES, P.C.  
107 East Main Street  
Millheim, PA 16854

(814) 349-5666

**CHILDREN:**

Elizabeth Pennington - dob 7/31/1994  
Michael Pennington - dob 3/5/1996

Legal Documents 1/2000A  
a:Pennington Beth A Complaint In Divorce

**FILED**

**JAN 31 2000**

William A. Shaw  
Prothonotary

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

BETH ANN PENNINGTON	:	
Plaintiff	:	
	:	
vs.	:	No.
	:	
ROBERT L. PENNINGTON,	:	
Defendant	:	

**NOTICE TO DEFEND AND CLAIM RIGHTS**

You have been sued in Court. If you wish to defend against the claims 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, Clearfield County Courthouse, 230 East Market Street, Clearfield, PA 16830.

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.

DAVID S. MEHOLICK  
COURT ADMINISTRATOR OFFICE  
CLEARFIELD COUNTY COURTHOUSE  
230 EAST MARKET STREET  
CLEARFIELD, PA 16830  
814-765-2641

## **NOTICE OF AVAILABILITY OF COUNSELING**

The Divorce Code provides that marriage counseling be available to parties in divorce actions. Under some circumstances the Court may require such counseling.

You should notify your attorney if you wish the Court to order marriage counseling.

The Domestic Relations Section will provide you with a list of qualified counselors, but you are not required to select a counselor from the list.

Fees for counseling are set by the counselors and payment is the responsibility of the parties involved. The costs of counseling provided by some agencies is based on ability to pay.

For additional information, contact your attorney or the Domestic Relations Section.

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

BETH ANN PENNINGTON	:	
Plaintiff	:	
	:	
vs.	:	No.
	:	
ROBERT L. PENNINGTON,	:	
Defendant	:	

**COMPLAINT**

AND NOW, comes the Plaintiff, BETH ANN PENNINGTON, by and through her attorneys, BRYANT & ASSOCIATES, P.C., who complains and says as follows:

1. Plaintiff is BETH ANN PENNINGTON, an adult individual, who resides at 107 Meadowlark Road, Morrisdale, Clearfield County, Pennsylvania 16858.
2. Defendant is ROBERT L. PENNINGTON, an adult individual, who resides at HQ MC HQBN Box 40, Arlington, Virginia 22214.
3. Plaintiff has been a resident of the Commonwealth of Pennsylvania for at least six months prior to the filing of this Complaint In Divorce.

AND/OR

Defendant has been a resident of the Commonwealth of Pennsylvania for at least six months prior to the filing of this Complaint In Divorce.

4. Plaintiff and Defendant were married on the 20<sup>th</sup> day of March, 1992, in Tampa, Florida.
5. There was a previous divorce action filed in Arlington, Virginia, wherein a final decree was issued on March 4, 1991. The parties then remarried on March 20, 1992.

6. Plaintiff avers that the marriage is irretrievably broken pursuant to Sections 3301(c) and/or (d) of the Divorce Code.

7. Plaintiff has been advised of the availability of counseling and that she may have the right to request that the Court require both Plaintiff and Defendant to participate in counseling in accordance with the provisions of Rule 1920.45.

WHEREFORE, Plaintiff prays your Honorable Court to enter a Decree In Divorce from the bonds of matrimony.

BRYANT & ASSOCIATES, P.C.

By: 

James N. Bryant, Esq.  
Attorney for Plaintiff  
Attorney ID No 14084  
107 East Main Street  
Millheim, PA 16854

I verify that the statements made in the foregoing 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.

Beth Pennington

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HEALTH  
VITAL RECORDSCOUNTY  
CLEARFIELD

RECORD OF	
DIVORCE	OR ANNULMENT
<input checked="" type="checkbox"/>	(CHECK ONE) <input type="checkbox"/>

STATE FILE NUMBER
STATE FILE DATE

SSN: 199-58-9251

## HUSBAND

1. NAME (First) (Middle) (Last) Robert L. Pennington	2. DATE (Month) (Day) (Year) OF BIRTH 6/8/62
3. RESIDENCE Street or R.D. City, Boro. or Twp. County State HQ MC HQBN Box 40, Arlington, Virginia 22214	4. PLACE (State or Foreign Country) OF BIRTH Pennsylvania
5. NUMBER OF THIS MARRIAGE 176-60-4537	6. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/> 7. USUAL OCCUPATION Marine Corp.

## WIFE

8. MAIDEN NAME (First) (Middle) (Last) Beth Ann Letavish	9. DATE (Month) (Day) (Year) OF BIRTH 9/29/66
10. RESIDENCE Street or R.D. City, Boro. or Twp. County State 107 Meadowlark Road, Morrisdale, Clearfield Co., Pennsylvania	11. PLACE (State or Foreign Country) OF BIRTH
12. NUMBER OF THIS MARRIAGE 176-60-4537	13. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/> 14. OCCUPATION Receptionist
15. PLACE OF THIS MARRIAGE (County) (State or Foreign Country) Tampa, Florida	16. DATE OF THIS MARRIAGE (Month) (Day) (Year)
17A. NUMBER OF CHILDREN THIS MARRIAGE 2	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18 2
18. PLAINTIFF HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	19. DECREE GRANTED TO HUSBAND <input type="checkbox"/> WIFE <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>
20. NUMBER OF CHILDREN TO CUSTODY OF HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> SPLIT CUSTODY <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT Irretrievable breakdown
22. DATE OF DECREE (Month) (Day) (Year)	23. DATE REPORT SENT TO VITAL RECORDS (Month) (Day) (Year)
24. SIGNATURE OF TRANSCRIBING CLERK	



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

BETH ANN PENNINGTON  
Plaintiff

vs.

ROBERT L. PENNINGTON,  
Defendant

No. 00-113-CD

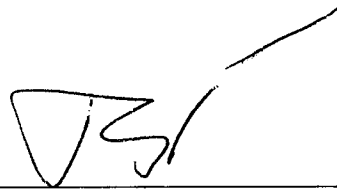
**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA

:  
: SS.  
:

COUNTY OF CENTRE

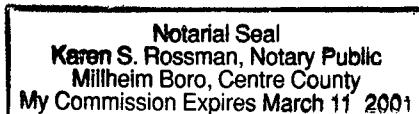
James N. Bryant, Esq., being duly sworn according to law, deposes and says that on February 4, 2000, he duly served upon BETH ANN PENNINGTON and ROBERT L. PENNINGTON, the Plaintiff and Defendant herein, a copy of Clearfield County Local Rule of Court 1920.3 pertain to the Children First Program, as well as a Children First Program brochure.



James N. Bryant, Esq.

Sworn to and subscribed before me  
this 4th day of February, 2000.

  
Notary Public



Member, Pennsylvania Association of Notaries

**FILED**

**FEB 08 2000**

William A. Shaw  
Prothonotary

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

BETH ANN PENNINGTON,  
Plaintiff

vs.

ROBERT L. PENNINGTON,  
Defendant

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NO. 00-113-C.D.

O R D E R

NOW, this 20th day of March, 2000, upon the Court's consideration of the Plaintiff's written request to be excused from the mandatory Children First Program, it is the ORDER of this Court that said request be and is hereby GRANTED.

By the Court,



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FREDRIC J. AMMERMAN

JUDGE

FILED

MAR 21 2000

William A. Shaw  
Prothonotary

*Handwritten signature*

FILED

MAR 21 2000  
011391cc P46  
WILLIAM A SHAW  
PROTHONOTARY  
Yola Nolan

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

BETH ANN PENNINGTON,  
Plaintiff

vs.

ROBERT L. PENNINGTON,  
Defendant

No. 00-113-CD

**PRAECIPE TO TRANSMIT RECORD**

TO THE PROTHONOTARY:

Transmit the record, together with the following information to the court for entry of a divorce decree:

1. Grounds for divorce: Irretrievable breakdown under Section 3301(c) of the Divorce Code.
2. Date and manner of service of the Complaint:

The Complaint In Divorce was filed on January 31, 2000. The Complaint was served upon the Defendant by Certified Mail No. Z 041 854 885, return receipt requested, delivery restricted to addressee. The Return Receipt was never returned to Sender. However, an Affidavit of Service signed by the Defendant, Robert L. Pennington, is being filed herewith indicating that he did receive the Complaint In Divorce on or about February 11, 2000.

3. Date of Execution of the Affidavit of Consent required by Section 3301(c) of the Divorce Code:

By Plaintiff: June 21, 2000

By Defendant: June 30, 2000

4. Related claims pending: NONE

  
JAMES N. BRYANT, ESQ.  
Attorney for Plaintiff

DATED: July 3, 2000

**FILED**

JUL 06 2000

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

BETH ANN PENNINGTON,  
Plaintiff

vs.

ROBERT L. PENNINGTON,  
Defendant

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No. 00-113-CD

**AFFIDAVIT OF SERVICE**

STATE OF VIRGINIA

COUNTY OF

ARLINGTON

:  
: SS.  
:

ROBERT L. PENNINGTON, being duly sworn according to law, deposes and says that:

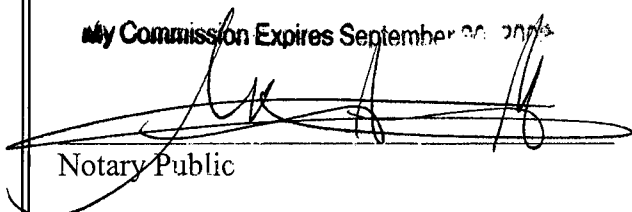
- A. I am the Defendant in the above-captioned matter; and
- B. On or about February 11, 2000, I received by certified mail, postage prepaid, a true and correct copy of the Complaint In Divorce filed to the above captioned matter.



Robert L. Pennington

Sworn to and subscribed before me  
this 30<sup>th</sup> day of June,  
2000.

~~My Commission Expires September 30, 2003~~



Notary Public

My Commission Expires September 30, 2003

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

BETH ANN PENNINGTON,  
Plaintiff

vs.

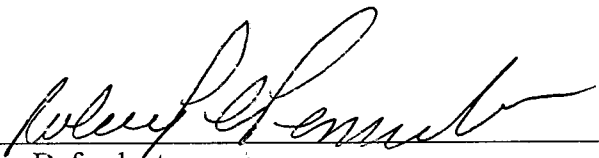
No. 00-113-CD

ROBERT L. PENNINGTON,  
Defendant

**AFFIDAVIT OF CONSENT**

1. A Complaint In Divorce under Section 3301 (c) of the Divorce Code was filed on January 31, 2000.
2. The marriage of Plaintiff and Defendant is irretrievably broken. Ninety days have elapsed since the filing of the complaint.
3. I consent to the entry of a final decree of divorce after service of notice of intention to request entry of the decree.

The party whose signature appears below verifies that the statements made in this affidavit are true and correct, and that they are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

  
Defendant

DATED: June 30, 2000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

BETH ANN PENNINGTON,  
Plaintiff

vs.

No. 00-113-CD

ROBERT L. PENNINGTON,  
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. § 4904 relating to unsworn falsification to authorities.

  
Defendant

DATED: June 30, 2000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

BETH ANN PENNINGTON,  
Plaintiff

vs.

No. 00-113-CD

ROBERT L. PENNINGTON,  
Defendant

**AFFIDAVIT OF CONSENT**

1. A Complaint In Divorce under Section 3301 (c) of the Divorce Code was filed on January 31, 2000.
2. The marriage of Plaintiff and Defendant is irretrievably broken. Ninety days have elapsed since the filing of the complaint.
3. I consent to the entry of a final decree of divorce after service of notice of intention to request entry of the decree.

The party whose signature appears below verifies that the statements made in this affidavit are true and correct, and that they are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Beth Ann Pennington  
Plaintiff

DATED: June 21, 2000



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

BETH ANN PENNINGTON,  
Plaintiff

vs.

ROBERT L. PENNINGTON,  
Defendant

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No. 00-113-CD

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

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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. § 4904 relating to unsworn falsification to authorities.

Beth Ann Pennington  
Plaintiff

DATED: June 21, 2000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

BETH ANN PENNINGTON,  
Plaintiff

No. 00-113-cd

ROBERT L. PENNINGTON,  
Defendant

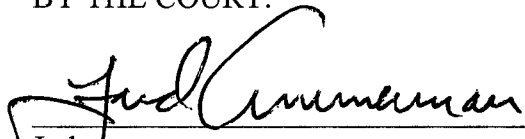
**DECREE IN DIVORCE**

AND NOW, this 12<sup>th</sup> day of July, 2000, it appears to the Court  
as follows:

1. A Complaint In Divorce under Section 3301(c) was served on the 11<sup>th</sup> day of February, 2000, alleging that the marriage between the parties hereto is irretrievably broken;
2. Ninety (90) days have elapsed from the date of the filing of said Complaint; and
3. Each party has filed an affidavit evidencing that they both consent to a divorce.

THEREFORE, it is hereby **ORDERED, ADJUDGED** and **DECREED** that a divorce from the bonds of matrimony is granted to **BETH ANN PENNINGTON** from **ROBERT L. PENNINGTON**.

BY THE COURT:

  
Judge

Certified from the record this \_\_\_\_\_ day of \_\_\_\_\_, A.D. 2000.

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HEALTH  
VITAL RECORDSCOUNTY  
CLEARFIELDRECORD OF  
DIVORCE OR ANNULMENT  
☒ (CHECK ONE) ☐

STATE FILE NUMBER

STATE FILE DATE

SSN: 199-58-9251

## HUSBAND

1. NAME (First) (Middle) (Last)	2. DATE (Month) (Day) (Year)
Robert L. Pennington	6/8/62
2. RESIDENCE Street or R.D. City, Boro. or Twp. County State	4. PLACE (State or Foreign Country) OF BIRTH
HQ MC HQBN Box 40, Arlington, Virginia 22214	Pennsylvania
5. NUMBER OF THIS MARRIAGE 3	6. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>
7. USUAL OCCUPATION Marie Corp.	

SSN: 176-60-4537

## WIFE

8. MAIDEN NAME (First) (Middle) (Last)	9. DATE (Month) (Day) (Year)
Beth Ann Letavish	9/26/66
10. RESIDENCE Street or R.D. City, Boro. or Twp. County State	11. PLACE (State or Foreign Country) OF BIRTH
107 Meadowlark Road, Morrisdale, Clearfield Co., Pennsylvania	Pennsylvania
12. NUMBER OF THIS MARRIAGE 3	13. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>
14. OCCUPATION Receptionist	
15. PLACE OF (County) (State or Foreign Country) OF THIS MARRIAGE	16. DATE OF (Month) (Day) (Year) THIS MARRIAGE
Tampa, Florida	3/20/92
17A. NUMBER OF CHILDREN THIS MARRIAGE 2	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18 2
18. PLAINTIFF HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	19. DECREE GRANTED TO HUSBAND <input type="checkbox"/> WIFE <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>
20. NUMBER OF CHILDREN TO HUSBAND WIFE SPLIT CUSTODY OTHER (Specify) CUSTODY OF <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT Irretrievable Breakdown
22. DATE OF DECREE (Month) (Day) (Year)	23. DATE REPORT SENT (Month) (Day) (Year) TO VITAL RECORDS
24. SIGNATURE OF TRANSCRIBING CLERK	