

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. : No. 00-113-30
ROBERT L. PENNINGTON, :
Defendant :
:

COMPLAINT IN DIVORCE

Filed on behalf of

Plaintiff

Counsel of Record for this Party:

James N. Bryant, Esq.
Attorney-At-Law
PA ID. 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

LED

JULY 31 2000

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.

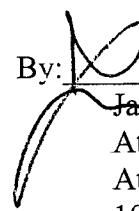
4. Plaintiff and Defendant were married on the 20th day of March, 1992, in Tampa, Florida.
5. There was a previous divorce action filed in Arlington, Virginia, wherein a final decree was issued on March 4, 1991. The parties then remarried on March 20, 1992.

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 RECORDS

COUNTY
CLEARFIELD

RECORD OF
DIVORCE OR ANNULMENT
 (CHECK ONE)

STATE FILE NUMBER
STATE FILE DATE

SSN: 199-58-9251				HUSBAND					
1. NAME (First)		(Middle)		(Last)		2. DATE OF BIRTH	(Month) (Day) (Year)		
Robert		L.		Pennington		6/8/62			
2. RESIDENCE Street or R.D.		City, Boro. or Twp.		County	State	4. PLACE OF BIRTH	(State or Foreign Country)		
HQ MC HQBN Box 40, Arlington, Virginia					22214	Pennsylvania			
5. NUMBER OF THIS MARRIAGE		6. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>		7. USUAL OCCUPATION Marine Corp.			
176-60-4537									
WIFE									
8. MAIDEN NAME (First)		(Middle)		(Last)		9. DATE OF BIRTH	(Month) (Day) (Year)		
Beth		Ann		Letavish		9/29/66			
10. RESIDENCE Street or R.D.		City, Boro, or Twp.		County	State	11. PLACE OF BIRTH	(State or Foreign Country)		
107 Meadowlark Road, Morrisdale, Clearfield Co., Pennsylvania									
12. NUMBER OF THIS MARRIAGE		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)				16. DATE OF THIS MARRIAGE	(Month) (Day) (Year)		
Tampa, Florida									
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 <input type="checkbox"/> 2		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.

No. 00-113-CD

ROBERT L. PENNINGTON,

Defendant

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.

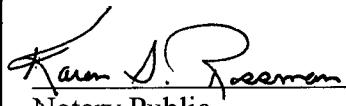


James N. Bryant, Esq.

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

FILED

FEB 8 2000



Karen S. Rossman
Notary Public

Notarial Seal
Karen S. Rossman, Notary Public
Millheim Boro, Centre County
My Commission Expires March 11 2001

Member, Pennsylvania Association of Notaries

William A. Shaw
Prothonotary

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

BETH ANN PENNINGTON,
Plaintiff

*

*

*

vs.

NO. 00-113-C.D.

*

*

*

ROBERT L. PENNINGTON,
Defendant

*

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,



FREDRIC J. AMMERMAN

JUDGE

FILED

MAR 21 2000

William A. Shaw
Prothonotary

CLLED

Mr.R 21/2000
Off.32/1 ICC Pk
W.M.T. Silaw
Promonary
ICC ~~to~~ Rola Nolan
EAT

RECORDED & INDEXED

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

BETH ANN PENNINGTON, :
Plaintiff :
vs. : No. 00-113-CD
ROBERT L. PENNINGTON, :
Defendant :
A

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:

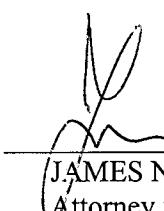
The Complaint In Divorce was filed on January 31, 2000. The Complaint was served upon the Defendant by Certified Mail No. Z 041 854 885, return receipt requested, delivery restricted to addressee. The Return Receipt was never returned to Sender. However, an Affidavit of Service signed by the Defendant, 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

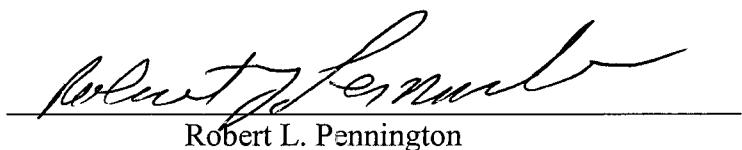
BETH ANN PENNINGTON, :
Plaintiff :
vs. : No. 00-113-CD
ROBERT L. PENNINGTON, :
Defendant :
:

AFFIDAVIT OF SERVICE

STATE OF VIRGINIA :
COUNTY OF Arlington : SS.
:

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

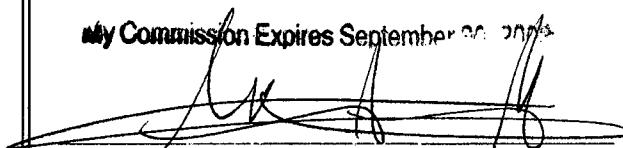
- A. I am the Defendant in the above-captioned matter; and
- B. On or about February 11, 2000, I received by certified mail, postage prepaid, a true and correct copy of the Complaint In Divorce filed to the above captioned matter.



Robert L. Pennington

Sworn to and subscribed before me
this 30th day of June,
2000.

My Commission Expires September 30, 2002



Notary Public

My Commission Expires September 30, 2002

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.



Robert L. Pennington
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. : No. 00-113-CD
: :
ROBERT L. PENNINGTON, :
Defendant :
:

WAIVER OF NOTICE OF INTENTION TO REQUEST
ENTRY OF A DIVORCE DECREE UNDER
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1. I consent to the entry of a final decree of divorce without notice.
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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

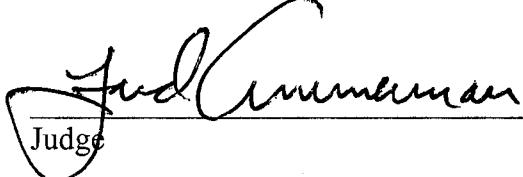
DECREE IN DIVORCE

AND NOW, this 10th day of July, 2000, it appears to the Court
as follows:

1. A Complaint In Divorce under Section 3301(c) was served on the 11th 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 RECORDS

COUNTY
CLEARFIELD

RECORD OF
DIVORCE OR ANNULMENT
 (CHECK ONE)

STATE FILE NUMBER
STATE FILE DATE

SSN: 199-58-9251

HUSBAND

1. NAME Robert	(First) L.	(Middle) Pennington	(Last)	2. DATE OF BIRTH 6/8/62	(Month) (Day) (Year)
2. RESIDENCE HQ MC HQBN Box 40, Arlington, Virginia	Street or R.D. HQ MC HQBN Box 40, Arlington, Virginia	City, Boro. or Twp. HQ MC HQBN Box 40, Arlington, Virginia	County 22214	State	4. PLACE OF BIRTH 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.	(State or Foreign Country)

SSN: 176-60-4537

WIFE

8. MAIDEN NAME Beth	(First) Ann	(Middle) Letavish	(Last)	9. DATE OF BIRTH 9/26/66	(Month) (Day) (Year)
10. RESIDENCE 107 Meadowlark Road, Morrisdale, Clearfield Co., Pennsylvania	Street or R.D. 107 Meadowlark Road, Morrisdale, Clearfield Co., Pennsylvania	City, Boro. or Twp. 107 Meadowlark Road, Morrisdale, Clearfield Co., Pennsylvania	County	State	11. PLACE OF BIRTH 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	(State or Foreign Country)

15. PLACE OF OF THIS MARRIAGE Tampa, Florida	(County) Tampa, Florida	(State or Foreign Country)	16. DATE OF THIS MARRIAGE 3/20/92	(Month) (Day) (Year)
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17A. NUMBER OF CHIL- DREN THIS MARRIAGE 2	17B. NUMBER OF DEPENDENT CHIL- DREN 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"/>
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20. NUMBER OF CHILDREN TO CUSTODY OF <input type="checkbox"/>	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
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22. DATE OF DECREE (Month) <input type="checkbox"/>	(Day) <input type="checkbox"/>	(Year) <input type="checkbox"/>	23. DATE REPORT SENT TO VITAL RECORDS (Month) <input type="checkbox"/>	(Day) <input type="checkbox"/>	(Year) <input type="checkbox"/>
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24. SIGNATURE OF TRANSCRIBING CLERK
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