

UU-122-CJ
ROBERT J. ALEXANDER -vs- RENEE M. ALEXANDER

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

ROBERT J. ALEXANDER,
Plaintiff

v.s.

RENEE M. ALEXANDER,
Defendant

: No. 00-122-00

: Type of Case: **DIVORCE**

: Type of Pleading: **COMPLAINT**

: Filed on Behalf of:

: Plaintiff, **ROBERT J. ALEXANDER**

: Counsel of Record for

: This Party:

: **Elizabeth Cunningham, Esquire**

: 26 South Second Street

: Clearfield, PA 16830

: (814) 765-1524

: Supreme Court No. 26899

No children born to this marriage.

ELIZABETH CUNNINGHAM, CLEARFIELD, PENNSYLVANIA

FILED

FEB 02 2000

William A. Shaw
Prothonotary

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

ROBERT J. ALEXANDER,
Plaintiff

v.s.

No.

RENEE M. ALEXANDER,
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 in 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 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 at the 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 OF 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.

Court Administrator
Clearfield County Courthouse
Clearfield, Pennsylvania 16830
(814) 765-2641, Ext. 50-51

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

ROBERT J. ALEXANDER,
Plaintiff

v.s.

No.

RENEE M. ALEXANDER,
Defendant

C O M P L A I N T

AND NOW, comes the Plaintiff, ROBERT J. ALEXANDER, who by and through his attorney, Elizabeth Cunningham, Esquire, files this Complaint and avers as follows:

COUNT I - DIVORCE/IRRETRIEVABLE BREAKDOWN

1. That the Plaintiff is ROBERT J. ALEXANDER, an adult individual, who presently resides at P.O. Box 43, Bigler, Clearfield County, Pennsylvania.
2. That the Defendant is RENEE M. ALEXANDER, an adult individual, who presently resides at P.O. Box 43, Bigler, Clearfield County, Pennsylvania 16830.
3. That the Plaintiff and Defendant have been bona fide residents in the Commonwealth of Pennsylvania for at least six (6) months immediately prior to filing this Complaint.
4. That the Plaintiff and Defendant were married on June 11, 1997, in Clearfield, Pennsylvania.
5. That there are no children born to the marriage.
6. That there has been no prior action for divorce or annulment instituted by either of the parties in this or any other jurisdiction.

7. That the marriage is irretrievably broken.

8. That the Plaintiff has been advised of availability of counseling and the right to request that the court require the parties to participate in counseling.

WHEREFORE, Plaintiff requests your Honorable Court to enter a decree in divorce, divorcing the Plaintiff and Defendant absolutely.

COUNT II - EQUITABLE PROPERTY DISTRIBUTION

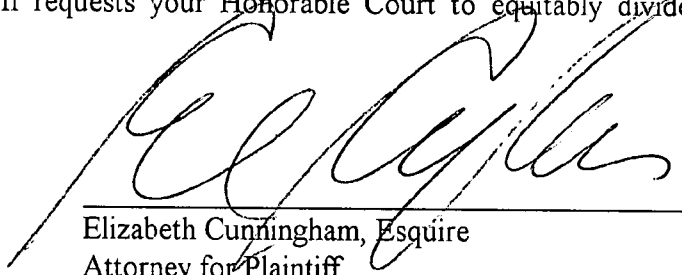
9. That Paragraph 1 through 8 of this Complaint are incorporated herein by reference as though set forth in full.

10. That Plaintiff and Defendant have legally and beneficially acquired both real and personal property during the course of their marriage.

11. That Plaintiff and Defendant have been unable to agree as to an equitable distribution of said marital property as of the date of the filing of this Complaint.

12. That a full and complete inventory and appraisal of all property owned or possessed by the Plaintiff will be filed as a matter of record in accordance with the Divorce Code Rules of Court applicable thereto.

WHEREFORE, Plaintiff requests your Honorable Court to equitably divide all marital property.



Elizabeth Cunningham, Esquire
Attorney for Plaintiff

VERIFICATION

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

Date: Jan 31 2000


ROBERT J. ALEXANDER

ELIZABETH CUNNINGHAM, CLEARFIELD, PENNSYLVANIA

FILED

File
FEB 02 2000

01114913
William A. Shaw
Prothonotary

cc atty Cunningham
att, Cunningham

PD \$95.00

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

ROBERT J. ALEXANDER,
Plaintiff

v.s.

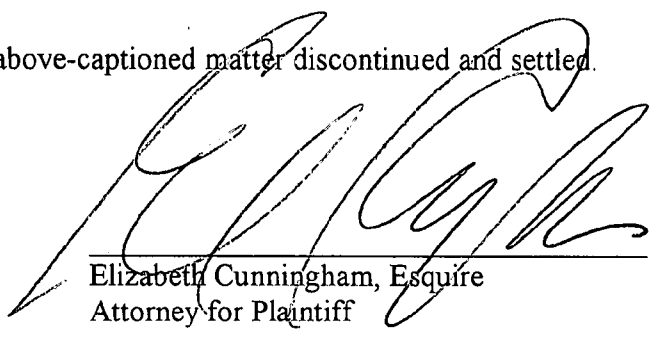
No. 00-122-CD

RENEE M. ALEXANDER,
Defendant

PRAECIPE TO DISCONTINUE

To the Prothonotary:

Please mark the record in the above-captioned matter discontinued and settled.



Elizabeth Cunningham, Esquire
Attorney for Plaintiff

Date: 1/14/00

FILED

FEB 15 2000

William A. Shaw
Prothonotary

ELIZABETH CUNNINGHAM, CLEARFIELD, PENNSYLVANIA

FILED

FEB 15 2011

01/29/11 City Cunningham

William A. Shaw
Prothonotary

Ent. Dec. to

City Cunningham

ERB

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

ROBERT J. ALEXANDER

Plaintiff(s)

vs.

No. 00-122-CD

RENEE M. ALEXANDER,

Defendant(s)

COPY

CERTIFICATE OF DISCONTINUANCE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

I, WILLIAM A. SHAW, Prothonotary of the Court of Common Pleas in and
for the County and Commonwealth aforesaid do hereby certify that the above
case was this day, the 15th of February A.D. 20 00, marked:

DISCONTINUED and SETTLED.

Record costs in the sum of \$95.00 have been paid in full by

Elizabeth Cunningham, Esquire

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this
Court at Clearfield, Clearfield County, Pennsylvania this 15th day of
February, A.D. 20 00.

Prothonotary

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

ROBERT J. ALEXANDER,

Plaintiff

VS.

RENEE M. ALEXANDER,

Defendant

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No. 00-122-CD

Type of Pleading: Answer and
Counterclaim

Filed on Behalf of:
Defendant

COUNSEL OF RECORD FOR THIS
PARTY:

David R. Thompson, Esquire
P.O. Box 587
Philipsburg, PA 16866
(814) 342-4100

I.D. No. 73053

FILED

FEB 18 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA.

CIVIL ACTION - LAW

ROBERT J. ALEXANDER,

PLAINTIFF

vs.

RENEE M. ALEXANDER,

DEFENDANT

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No. 00-122-CD

TYPE OF PLEADING: Answer and
Counterclaim

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 against you and a Decree of Divorce or annulment may be entered against you for any other claim. 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 the marriage counselors is available in the Office of the Prothonotary at Clearfield County Courthouse, Clearfield, Pennsylvania, 16830.

IF YOU DO NOT FILE FOR ALIMONY, MARITAL PROPERTY, COUNSEL FEES, OR EXPENSES BEFORE THE FINAL DECREE OF DIVORCE OR ANNULMENT IS ENTERED, 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.

Court Administrator
Clearfield County Courthouse
Clearfield PA 16830
(814) 765-2641

By: 

David R. Thompson, Esquire

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

ROBERT J. ALEXANDER,

Plaintiff

vs.

RENEE M. ALEXANDER,

Defendant

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No. 00-122-CD

ANSWER AND COUNTERCLAIM

AND NOW, comes the Defendant, Renee M. Alexander, by and through her attorney,
David R. Thompson, Esquire, and files the following Answer to Divorce Complaint:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied.
8. Admitted.

WHEREFORE, Defendant requests your Honorable Court to dismiss Plaintiff's
complaint requesting a decree in divorce, divorcing the Plaintiff and Defendant absolutely.

9. No response necessary.
10. Admitted.
11. Admitted.

12. Admitted.

WHEREFORE, Defendant requests your Honorable Court to dismiss an Order equitably distributing all marital property of the parties as well as equitably allocating all marital debt of the parties.

COUNTERCLAIM

ALIMONY, ALIMONY PENDENTE LETE

AND COUNSEL FEES

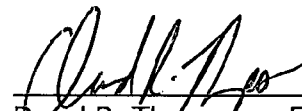
Paragraphs 1 through 12 are incorporated by reference as though the same were set forth at length herein.

13. While Defendant is employed as a Dental Assistant, she is not in a position to adequately support herself as well as paying for various marital debts owed by both parties.

14. For that reason, she is requesting this Honorable Court to enter an Order awarding her alimony, alimony pendente lete and payment of Defendant's counsel fees.

WHEREFORE, Defendant respectfully requests this Honorable Court to enter an Order awarding her alimony, alimony pendente lete and counsel fees upon her Petition.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David R. Thompson", is written over a horizontal line.

David R. Thompson, Esquire
Attorney for Defendant

FILED

01/10:09 AM
FEB 18 2000

William A. Shaw
Prothonotary

1 C to Att.

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RDL

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PA

CIVIL DIVISION

ROBERT J. ALEXANDER,

PLAINTIFF

VS.

RENEE M. ALEXANDER,

DEFENDANT

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NO. 00-122-CD

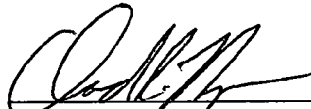
CERTIFICATE OF SERVICE

TO THE PROTHONOTARY:

I, DAVID R. THOMPSON, ESQUIRE, hereby certify that I have served a true and correct, certified copy of the **ANSWER AND COUNTERCLAIM**, in the above captioned matter on the following by depositing the same in the U.S. First Class Mail, postage prepaid, addressed as follows:

Elizabeth Cunningham, Esquire
26 South Second Street
Clearfield, Pa 16830

Dated: 2/18/00


David R. Thompson, Esquire
Attorney for Defendant

FILED ^{1 cc} ^{Atty}
01/21/33
FEB 23 AM
William A. Shaw
Prothonotary