

00-152-CD
DOROTHY M. MCBRIDE -vs- PATRICK A. MCBRIDE

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

DOROTHY M. MCBRIDE,

Plaintiff

vs.

PATRICK A. MCBRIDE,

Defendant

No. 00-152-CO

COMPLAINT IN DIVORCE
UNDER SECTION 3301(D) OF
THE DIVORCE CODE

File on behalf of

Plaintiff

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

No minor children to this marriage.

FILED

FEB 08 2000

William A. Shaw
Prothonotary

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
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	<input type="checkbox"/>	Custody and Visitation
<input type="checkbox"/>	Division of Property	<input type="checkbox"/>	Alimony
<input type="checkbox"/>	Temporary Alimony	<input type="checkbox"/>	Attorneys Fees
<input type="checkbox"/>	Costs		

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 rights important to you, including custody or visitation of your child.

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 of Clearfield County, William B. Shaw, Prothonotary & Clerk of Courts, 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.

COURT ADMINISTRATOR
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641, Ext. 50-51

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

DOROTHY M. MCBRIDE,
Plaintiff

vs.

No.

PATRICK A. MCBRIDE,
Defendant

DIVORCE UNDER SECTION 3301 (D)
OF THE DIVORCE CODE


NOW COMES, the Plaintiff, DOROTHY M. MCBRIDE, by and through her attorneys, Belin & Kubista, and sets forth the following Complaint in Divorce and would aver as follows:

1. That Plaintiff is Dorothy M. McBride, an adult individual, currently residing at R.D. #2, Box 276, Clearfield, Clearfield County, Pennsylvania 16830.
2. That Defendant is Patrick A. McBride, an adult individual, currently residing at R.D. #2, Box 276, Clearfield, Clearfield County, Pennsylvania 16830.
3. That Plaintiff and Defendant have been bona fide residents in the Commonwealth for at least six months immediately previous to the filing of this Complaint.
4. That the Plaintiff and Defendant were married on June 19, 1953, in Clearfield, Clearfield County, Pennsylvania.
5. That there were no previous actions in divorce.
6. The marriage is irretrievably broken.
7. The parties have lived separate and apart for a period in excess of two (2) years in accordance with Section 3301(d) of the Divorce Code.

8. The Plaintiff has been advised that counseling is available and that Plaintiff may have 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 Plaintiff and Defendant absolutely.

BELIN & KUBISTA


Kimberly M. Kubista
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA

:

SS

COUNTY OF CLEARFIELD

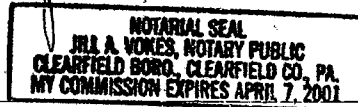
:

Before me, the undersigned Officer, personally appeared DOROTHY M. MCBRIDE, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint in Divorce are true and correct to the best of her knowledge, information and belief.

Dorothy M. McBride
DOROTHY M. MCBRIDE

SWORN and SUBSCRIBED before me this 8th day of February, 2000.

Jill A. Vokes



BELIN & KUBISTA

ATTORNEYS AT LAW

15 NORTH FRONT STREET

P. O. BOX 1

CLEARFIELD, PENNSYLVANIA 16830

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

DOROTHY M. MCBRIDE, :
Plaintiff :

vs. :

PATRICK A. MCBRIDE, :
Defendant :

No. 00 - 152 - 60

AFFIDAVIT UNDER SECTION
3301(d) OF THE DIVORCE
CODE

File on behalf of

Plaintiff

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

FEB 08 2000

William A. Shaw
Prothonotary

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
Defendant :

NOTICE TO THE DEFENDANT

If you wish to deny any of the statements set forth in this affidavit, you must file a counter-affidavit within twenty (20) days after this affidavit has been served on you or the statements will be admitted.

AFFIDAVIT UNDER SECTION 3301(d)
OF THE DIVORCE CODE

1. The parties to this action separated in November 1984 and have continued to live separate and apart for a period of at least two years.
2. The marriage is irretrievably broken.
3. 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: 2/9/00

Dorothy M. McBride
Dorothy M. McBride, Plaintiff

BELIN & KUBISTA

ATTORNEYS AT LAW

15 NORTH FRONT STREET

P. O. BOX 1

CLEARFIELD, PENNSYLVANIA 16830

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

DOROTHY M. MCBRIDE,

Plaintiff

vs.

PATRICK A. MCBRIDE,

Defendant

No. 00-152-60

NOTICE OF INTENTION TO
REQUEST ENTRY OF DIVORCE
DECREE

File on behalf of

Plaintiff

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

FEB 08 2000

William A. Shaw
Prothonotary

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
Defendant :

NOTICE OF INTENTION TO REQUEST ENTRY
OF DIVORCE DECREE

TO: Patrick A. McBride
R.D. #2, Box 276
Clearfield, PA 16830

You have been sued in an action for divorce. You have failed to answer the complaint or file a counter-affidavit to the Section 3301(d) affidavit. Therefore, on or after February 29, 2000, the other party can request the court to enter a final decree in divorce.

If you do not file with the Prothonotary of the court an answer with your signature notarized or verified or a counter-affidavit by the above date, the court can enter a final decree in divorce. A counter-affidavit which you may file with the Prothonotary of the court is attached to this notice.


Unless you have already filed with the court a written claim for economic relief, you must do so by the above date or the court may grant the divorce and you will lose forever the right to ask for economic relief. The filing of the form counter-affidavit alone does not protect your economic claims.

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
Market & Second Streets
Clearfield, PA 16830
(814) 765-2641

BELIN & KUBISTA



Kimberly M. Kubista
Attorney for Plaintiff

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
Defendant :

COUNTER-AFFIDAVIT UNDER
SECTION 3301(d) OF THE DIVORCE CODE

1. Check either (a) or (b)

(a) I do not oppose the entry of a divorce decree. []

(b) I oppose the entry of a divorce decree because
(Check (i), (ii), or (both))

(i) The parties to this action have not lived separate and apart
for a period of at least two years. []

(ii) The marriage is not irretrievably broken. []

2. Check either (a) or (b):

(a) I do not wish to make any claims for economic relief. 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. []

(b) I wish to claim economic relief which may include alimony, division of
property, lawyer's fees or expenses or other important rights. []

I understand that in addition to checking (b) above, I must also file all of my economic
claims with the prothonotary in writing and serve them on the other party. If I fail to do so before
the date set forth on the Notice of Intention to Request Divorce Decree, the divorce decree may be
entered without further delay.

I verify that the statements made in this counter-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.

Date: _____

Patrick A. McBride, Defendant

NOTICE: IF YOU DO NOT WISH TO OPPOSE THE ENTRY OF A DIVORCE DECREE AND YOU DO NOT WISH TO MAKE ANY CLAIM FOR ECONOMIC RELIEF, YOU SHOULD NOT FILE THIS COUNTER-AFFIDAVIT.

BELIN & KUBISTA

ATTORNEYS AT LAW

15 NORTH FRONT STREET

P. O. BOX 1

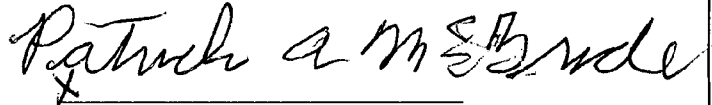
CLEARFIELD, PENNSYLVANIA 16830

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

DORCTHY M. MCBRIDE, :
Plaintiff :
vs. : No. 00-152-CD
PATRICK A. MCBRIDE, :
Defendant :

ACCEPTANCE OF SERVICE

I accept service of the Complaint in Divorce in the above referenced case on
behalf of myself.


Patrick A. McBride, Defendant

Date: 03/01/00

FILED

MAR 03 2000

William A. Shaw
Prothonotary

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.00-152-CD
PATRICK A. MCBRIDE, :
Defendant :

COUNTER-AFFIDAVIT UNDER
SECTION 3301(d) OF THE DIVORCE CODE

1. Check either (a) or (b)
 - (a) I do not oppose the entry of a divorce decree. ☒
 - (b) I oppose the entry of a divorce decree because
(Check (i), (ii), or (both))
 - (i) The parties to this action have not lived separate and apart
for a period of at least two years. []
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the date set forth on the Notice of Intention to Request Divorce Decree, the divorce decree may be
entered without further delay.

FILED

MAR 03 2000

William A. Shaw
Prothonotary

I verify that the statements made in this counter-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.

Date: 03/01/00

Patrick A. McBride
Patrick A. McBride, Defendant

NOTICE: IF YOU DO NOT WISH TO OPPOSE THE ENTRY OF A DIVORCE DECREE AND YOU DO NOT WISH TO MAKE ANY CLAIM FOR ECONOMIC RELIEF, YOU SHOULD NOT FILE THIS COUNTER-AFFIDAVIT.

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

DOROTHY M. MCBRIDE,

Plaintiff

vs.

PATRICK A. MCBRIDE,

Defendant

No. 00-152-CD

PRAECIPE TO TRANSMIT THE
RECORD

File on behalf of

Plaintiff

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

MAR 22 2000

William A. Shaw
Prothonotary

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
Defendant :

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. Ground for divorce: Section 3301(d) of the Divorce Code.

2. That Defendant accepted service of a Complaint under Section 3301(d) at R.D. #2, Box 276, Clearfield, Pennsylvania 16830 on March 1, 2000.

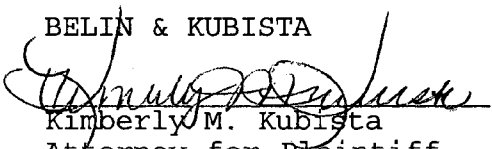
3. That Plaintiff's Affidavit required by Section 3301(d) of the Divorce Code was executed on February 9, 2000, and served upon Defendant, on February 10, 2000, by first class mail.

4. Related claims pending: None.

5. Plaintiff and Defendant have lived separate and apart in excess of two (2) years.

6. A Notice of Intention to Request Entry of Divorce Decree, a copy of which is attached hereto, was served upon Defendant, by first-class mail on February 10, 2000.

BELIN & KUBISTA


Kimberly M. Kubista
Attorney for Plaintiff

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

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
Defendant :

NOTICE OF INTENTION TO REQUEST ENTRY
OF DIVORCE DECREE

TO: Patrick A. McBride
R.D. #2, Box 276
Clearfield, PA 16830

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If you do not file with the Prothonotary of the court an answer with your signature notarized or verified or a counter-affidavit by the above date, the court can enter a final decree in divorce. A counter-affidavit which you may file with the Prothonotary of the court is attached to this notice.

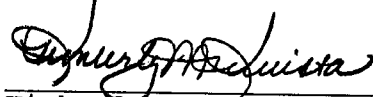
Unless you have already filed with the court a written claim for economic relief, you must do so by the above date or the court may grant the divorce and you will lose forever the right to ask for economic relief. The filing of the form counter-affidavit alone does not protect your economic claims.

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
Market & Second Streets
Clearfield, PA 16830
(814) 765-2641

BELIN & KUBISTA

A handwritten signature in cursive script, appearing to read "Kimberly M. Kubista", written over a horizontal line.

Kimberly M. Kubista
Attorney for Plaintiff

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

CP

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

DOROTHY M. MCBRIDE,

Plaintiff

vs.

PATRICK A. MCBRIDE,

Defendant

No. 00-152-CD

DIVORCE DECREE

File on behalf of

Plaintiff

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

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15 N. Front Street
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Clearfield, PA 16830
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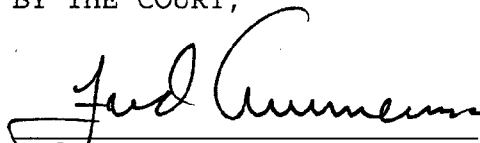
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DOROTHY M. MCBRIDE, :
Plaintiff :
vs. : No.
PATRICK A. MCBRIDE, :
Defendant :

DIVORCE DECREE

AND NOW, this 23 day of March, 2000,
it is ORDERED and DECREED that DOROTHY M. MCBRIDE, Plaintiff and
PATRICK A. MCBRIDE, Defendant are divorced from the bonds of
matrimony.

BY THE COURT,


Judge

BELIN & KUBISTA

ATTORNEYS AT LAW

15 NORTH FRONT STREET

P. O. BOX 1

CLEARFIELD, PENNSYLVANIA 16830

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
VITAL RECORDS

COUNTY

Clearfield

RECORD OF
DIVORCE OR ANNULMENT
☒ (CHECK ONE) ☐

STATE FILE NUMBER

STATE FILE DATE

HUSBAND

1. NAME	(First)	(Middle)	(Last)	2. DATE OF BIRTH	(Month)	(Day)	Year
3. RESIDENCE	Street or R.D. City, Boro. or Twp. County State			4. PLACE OF BIRTH	(State or Foreign Country)		
R.D. #2, Box 276, Clearfield, Clearfield County, PA				Pennsylvania			
5. NUMBER OF THIS MARRIAGE	1	6. RACE	WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	7. USUAL OCCUPATION	Retired		

WIFE

8. MAIDEN NAME	(First)	(Middle)	(Last)	9. DATE OF BIRTH	(Month)	(Day)	Year
Hull Dorothy M. McBride				6/26/34	(State or Foreign Country)		
10. RESIDENCE	Street or R.D. City, Boro. or Twp. County State			11. PLACE OF BIRTH	(State or Foreign Country)		
R.D. #2, Box 276, Clearfield, Clearfield County, PA				Pennsylvania			
12. NUMBER OF THIS MARRIAGE	1	6. RACE	WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	14. USUAL OCCUPATION	Retired		
15. PLACE OF MARRIAGE	(County)	(State or Foreign Country)		16. DATE OF THIS MARRIAGE	(Month)	(Day)	(Year)
Clearfield County, Pennsylvania				6/19/53			
17A. NUMBER OF CHILDREN THIS MARRIAGE	5	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18	0	18. PLAINTIFF HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/>	19. DECREE GRANTED TO HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		
20. NUMBER OF CHILDREN TO CUSTODY OF	HUSBAND <input type="checkbox"/> WIFE <input type="checkbox"/> SPLIT CUSTODY <input type="checkbox"/> n/a	OTHER (Specify) <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT	3301(d)			
22. DATE OF DECREE	(Month)	(Day)	(Year)	23. DATE REPORT SENT TO VITAL RECORDS	(Month)	(Day)	(Year)

24. SIGNATURE OF
TRANSCRIBING CLERK