

00-231-0D
SUZANNE KATHLEEN GILL -vs- JOHN J. GILL, JR.

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
Defendant

No. 06 · 231 · 00

Type of Case: Divorce

Type of Pleading: Complaint

Filed on Behalf of: Plaintiff

Counsel of Record for this Party:
Alan F. Kirk, Esq

Supreme Court No.: 36893

1375 Martin Street, Suite 204
State College, PA 16803

(814) 234-2048

NO CHILDREN

FILED

FEB 23 2000

William A. Shaw
Prothonotary

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
Defendant

: No.
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NOTICE TO DEFEND AND CLAIM RIGHTS

You have been sued in court for:

☒ Divorce

☐ Support

☒ Equitable Distribution

☐ Temporary Alimony

☐ Costs

☐ Annulment of Marriage

☐ Custody and Visitation

☐ Alimony

☐ Attorneys Fees

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 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, Clearfield County Courthouse, Clearfield, Pennsylvania.

IF YOU DO NOT FILE A CLAIM 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
Second & Market Streets
Clearfield, PA 16830
(814) 765-2641 Ext. 50-51

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
Defendant

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COMPLAINT

COMES NOW, SUZANNE KATHLEEN GILL, by and through her attorneys, Alan F. Kirk, Esq., and files the within Complaint in Divorce under Section 3301(c) of the Domestic Relations Code. In support thereof, Plaintiff respectfully shows as follows:

COUNT I - DIVORCE

1. That Plaintiff is Suzanne Kathleen Gill, of 103 Roblin Avenue, Curwensville, Pennsylvania, 16833.
2. That Defendant is John J. Gill, of 103 Roblin Avenue, Curwensville, Pennsylvania, 16833.
3. That both Plaintiff and Defendant have been bona fide residents of the Commonwealth of Pennsylvania for at least six (6) months immediately previous to the filing of this Complaint.
4. That Plaintiff and Defendant were married on October 22, 1994 in Clearfield, Pennsylvania.
5. That there have been no prior actions of divorce or annulment between the parties.
6. That no children were born of the marriage.

7. That the marriage between the parties is irretrievably broken, and the parties have determined that they shall take steps toward obtaining a divorce under §3301 (c) of the Domestic Relations Code.

WHEREFORE, Plaintiff requests that this Honorable Court enter a Decree of Divorce.

COUNT II - EQUITABLE DISTRIBUTION

8. Paragraphs 1 - 7 of this Complaint are incorporated herein by reference and made a part hereof as if set forth at length.

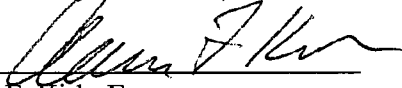
9. That Plaintiff and Defendant have legally and beneficially acquired property, both real and personal, during their marriage from, October 22, 1994 until the date of separation, November 17, 1999.

10. Plaintiff and Defendant have been unable to agree to an equitable division of said property to the date of the filing of this Complaint.

11. That an Inventory and Appraisement of all property owned or possessed by Plaintiff will be supplied in accordance with the Divorce Code.

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


Respectfully Submitted,



Alan F. Kirk, Esq.
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.


Suzanne Kathleen Gill, Plaintiff

DATE: 12/28/99

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William A. Shaw

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PD #95.00

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
Defendant

: No. 00-231-CD
:
: Type of Case: Divorce
: Type of Pleading: Affidavit of Service
:
: Filed on Behalf of: Plaintiff
:
: Counsel of Record for this Party:
: Alan F. Kirk, Esq
:
: Supreme Court No.: 36893
:
: 1375 Martin Street, Suite 204
: State College, PA 16803
:
: (814) 234-2048

FILED

JUN 02 2000

William A. Shaw
Prothonotary

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

SUZANNE KATHLEEN GILL,
Plaintiff

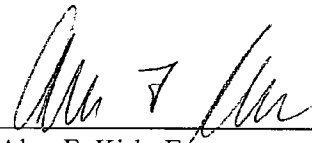
v.

JOHN J. GILL, JR.,
Defendant

: No. 00-231-CD
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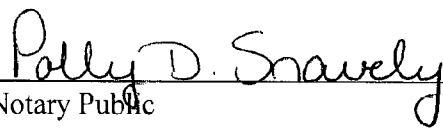
AFFIDAVIT OF SERVICE

I, Alan F. Kirk, hereby certify that a true and correct copy of the Complaint in Divorce in the above captioned matter was served upon the Defendant by certified mail, on February 25, 2000, as indicated by the attached return receipt.



Alan F. Kirk, Esq.

Subscribed and Sworn to before me
this 31st day of May, 2000.



Notary Public

Notarial Seal
Polly D. Snively, Notary Public
Ferguson Twp., Centre County
My Commission Expires Nov. 21, 2002
Member, Pennsylvania Association of Notaries

Z 466 356 499

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to John J. Gill, Jr.	
Street & Number 103 Roblin Avenue	
Post Office, State, & ZIP Code Curwensville, PA 16833	
Postage	\$.55
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	2/25/00
TOTAL Postage & Fees	\$ 3.20
Postmark or Date	

PS Form 3800, April 1995

USPS

<p>SENDER:</p> <ul style="list-style-type: none"> Complete items 1 and/or 2 for additional services. Complete items 3, 4a, and 4b. Print your name and address on the reverse of this form so that we can return this card to you. Attach this form to the front of the mailpiece, or on the back if space does not permit. Write "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered. 		<p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p>
<p>3. Article Addressed to:</p> <p>John J. Gill, Jr. 103 Roblin Avenue Curwensville, PA 16833</p>	<p>4a. Article Number Z 466 356 499</p>	
	<p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Insured</p> <p><input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD</p>	
	<p>7. Date of Delivery 2-25-00</p>	
<p>5. Received By: (Print Name)</p>	<p>8. Addressee's Address (Only if requested and fee is paid)</p>	
<p>6. Signature: (Addressee or Agent)</p> <p>X John J. Gill Jr.</p>		

PS Form 3811, December 1994

02595-97-B-0179 Domestic Return Receipt

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

FILED

JUN 02 2003

William A. Shaw

Prothonotary

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
Defendant

: No. 00-231-CD
:
: Type of Case: Divorce
: Type of Pleading: Motion for Entry of
: Divorce Decree
:
: Filed on Behalf of: Plaintiff
:
: Counsel of Record for this Party:
: Alan F. Kirk, Esq
:
: Supreme Court No.: 36893
:
: 1375 Martin Street, Suite 204
: State College, PA 16803
:
: (814) 234-2048

FILED

JUN 14 2000

William A. Shaw
Prothonotary

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
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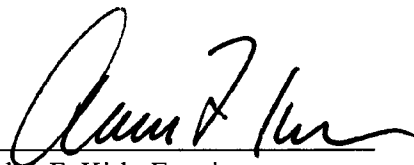
: No. 00-231-CD
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MOTION FOR ENTRY OF DECREE

NOW COMES, SUZANNE KATHLEEN GILL, PLAINTIFF, and presents the following
Petition setting forth the following reasons therefore:

1. That the Complaint in Divorce in this action was filed on February 23, 2000 alleging irretrievable breakdown of the marriage pursuant to §3301(c) of the Domestic Relations Code.
2. That an Affidavit of Consent, required by the Code and in the form prescribed by Pa. R.C.P. 1920.72 was filed by each party.
3. That more than ninety (90) days have elapsed since the filing of the Divorce Complaint.
4. That the within Petition requests the granting of a Divorce Decree incorporating that certain Settlement Agreement between the parties hereto dated November 17, 1999, attached hereto and incorporated herein by reference.

WHEREFORE, Plaintiff respectfully prays that this Honorable Court enter a Decree of Divorce by default.


Alan F. Kirk, Esquire
Attorney for Plaintiff

WE AGREE TO THE DIVISION OF PROPERTIES AS FOLLOWS:

JOHN'S:

91 FORD EXPLORER
SHARP VCR
STEREO EQUIPMENT W/ SPEAKERS
TOOLS BLACK LEATHER CHAIR W/ FOOTSTOOL
MOTOROLA PHONE
GRILL
DINING ROOM SET
FRIGIDAIRE SIDE BY SIDE REFRIGERATOR
BLACK ENTERTAINMENT CENTER
BLACK BENCH SEAT
60" HITACHI TV
ANY PERSONAL BELONGINGS

SUE'S:

89 TOYOTA PICK-UP
BLACK LEATHER SECTIONAL
BLACK RECLINER
COFFEE TABLE
DOLPHIN PAINTING
MAGNAVOX 27" TV
PATIO FURNITURE
COMPAQ 4850 COMPUTER
H P PRINTER & SCANNER
3 PIECE COMPUTER DESK
JVC VCR
LIGHTED ROUND STAND
YASHICA CAMERA
SONY CAMERA
ANY PERSONAL BELONGINGS

THE PROCEEDS OF SALE OF THE HOUSE WILL BE DIVIDED EQUALLY AFTER
PAYING OFF THE MORTGAGE AT COUNTY NATIONAL BANK ACCOUNT #
1096126-00004. ALL OTHER JOINT ACCOUNTS HAVE BEEN PAID IN FULL.
ANY DEBTS OCCURRED AFTER THIS DATE WILL BE THE SOLE
RESPONSIBILITY OF THAT PERSON.
ALL JOINT MONEY HAS BEEN DIVIDED EQUALLY. ALL INDIVIDUAL
ACCOUNTS ARE THE SOLE RESPONSIBILITY AND OWNERSHIP OF THAT
PERSON.

Suzanne Hill 11/17/99

John Jr. Hill Jr. 11-17-99

FILED
JUN 14 2000
William A. Shaw
Prothonotary

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

SUZANNE KATHLEEN GILL,
Plaintiff

v.

JOHN J. GILL, JR.,
Defendant

: No. 00-231-CD
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: Type of Case: Divorce
: Type of Pleading: Praecipe to Transmit
: Record
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: Filed on Behalf of: Plaintiff
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:
: Counsel of Record for this Party:
: Alan F. Kirk, Esq
:
:
: Supreme Court No.: 36893
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IN THE COURT OF COMMON PLEAS
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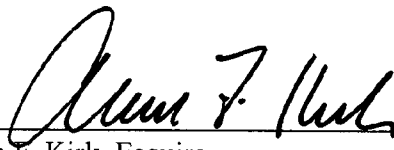
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PRAECIPE TO TRANSMIT RECORD

TO: WILLIAM A. SHAW, 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 §3301(c) of the Domestic Relations Code.
2. Date and manner of service of the Complaint: Complaint was served by certified mail on February 25, 2000.
3. Date of execution of the affidavit of consent required by §3301(c) of the Domestic Relations Code: by Plaintiff on June 6, 2000; by Defendant on June 6, 2000.
4. Relating claims pending: None.



Alan F. Kirk, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS
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SUZANNE KATHLEEN GILL,
Plaintiff

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: No. 00-231-CD
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AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under § 3301(c) of the Domestic Relations Code was filed on or about February 23, 2000 at the above docket.

2. The marriage of the Plaintiff and Defendant is irretrievably broken and ninety (90) days has elapsed from date of filing of 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, attorney'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. §4904 relating to unsworn falsification to authorities.


Suzanne Kathleen Gill

Date: 6/5/00

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
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SUZANNE KATHLEEN GILL,
Plaintiff

v.

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John J. Gill, Jr. *John J. Gill Jr.*

Date: 6-5-00

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

SUZANNE KATHLEEN GILL,
Plaintiff

No. 00-231-CD

v.

JOHN J. GILL, JR.,
Defendant

**WAIVER OF NOTICE OF INTENTION TO REQUEST ENTRY OF A
DIVORCE DECREE UNDER SECTION 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.


Suzanne Kathleen Gill

Date: 6/5/00

IN THE COURT OF COMMON PLEAS
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Plaintiff

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John J. Gill, Jr.
John J. Gill, Jr.

Date: 6-5-00

FILED
JUN 14 2000
M/2:37 PM
Prothonotary
William A. Shaw

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
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SUZANNE KATHLEEN GILL,
Plaintiff

v.

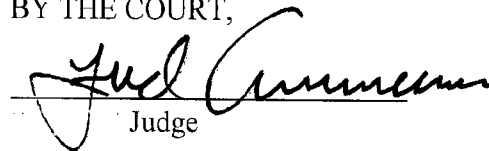
JOHN J. GILL, JR.,
Defendant

No. 00-231-CD

DIVORCE DECREE

AND NOW, this 15 day of June, 2000, upon Petition of Alan F. Kirk, Esquire, counsel for Plaintiff, that ninety (90) days have passed since the Plaintiff prayed for said Divorce and the consent of both parties having been evidenced, it is the ORDER and DECREE of this Court that Suzanne Kathleen Gill be divorced and forever separated from the nuptial ties and bonds of matrimony heretofore contracted between herself and John J. Gill, Jr., thereupon all the rights, duties, claims accruing to either of the said parties in 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 and that full faith and recognition is to be given to that certain Postnuptial Agreement dated November 17, 1999, as signed and executed by the parties hereto and that the said Agreement is incorporated into the Decree herein.

BY THE COURT,


Judge

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

HUSBAND

1. NAME (First) (Middle) (Last) John J. Gill, Jr.	2. DATE OF BIRTH (Month) (Day) (Year) 5 29 1962	
3. RESIDENCE (Street or R.D.) (City, Boro. or Twp.) (County) (State) 103 Roblin Ave., Curwensville, Clearfield Co., PA	4. PLACE OF BIRTH (State or Foreign Country) Pennsylvania	
5. NUMBER OF THIS MARRIAGE 2	6. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	7. USUAL OCCUPATION Truck Driver

WIFE

8. MAIDEN NAME (First) (Middle) (Last) Suzanne Kathleen Doran	9. DATE OF BIRTH (Month) (Day) (Year) 9 17 1961		
10. RESIDENCE (Street or R.D.) (City, Boro. or Twp.) (County) (State) 103 Roblin Ave., Curwensville, Clearfield Co, PA	11. PLACE OF BIRTH (State or Foreign Country) Pennsylvania		
12. NUMBER OF THIS MARRIAGE 3	13. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	14. USUAL OCCUPATION Assistant Foreman	
15. PLACE OF THIS MARRIAGE (County) (State or Foreign Country) Clearfield PA	16. DATE OF THIS MARRIAGE (Month) (Day) (Year) 10 22 1994		
17A. NUMBER OF CHILDREN THIS MARRIAGE 0	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18. 0	18. PLAINTIFF HUSBAND <input type="checkbox"/> WIFE <input type="checkbox"/> OTHER (Specify) <input 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"/> OTHER (Specify) <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT 3301(c)		
22. DATE OF DECREE (Month) (Day) (Year)	23. DATE REPORT SENT TO VITAL RECORDS (Month) (Day) (Year)		

24. SIGNATURE OF
TRANSCRIBING CLERK