

00-239-CD  
TAMARA K. CARTWRIGHT -vs- GARY L. CARTWRIGHT, SR.

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

TAMARA K. CARTWRIGHT,  
Plaintiff

vs.

GARY L. CARTWRIGHT, SR.,  
Defendant

COMPLAINT IN DIVORCE

FILED 2cc AMY  
10/11/00 Atty Gearhart  
FEE PA 90.00  
William A. Strat  
Prothonotary

R. DENNING GEARHART  
ATTORNEY AT LAW  
CLEARFIELD, PA. 16830

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

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00-239 -CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
Defendant :

CASE NUMBER: 00-239 -CD

TYPE OF CASE: Divorce

TYPE OF PLEADING: COMPLAINT IN DIVORCE

FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE  
Supreme Court I.D. #26540  
215 East Locust Street  
Clearfield, PA 16830  
(814) 765-1581

CHILDREN: AMBER CARTWRIGHT (d.o.b. 9/8/83)

FILED

FEB 24 2000

William A. Shaw  
Prothonotary

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

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00- -CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
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 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 at Clearfield County Courthouse, Clearfield, Pennsylvania, 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.

COURT ADMINISTRATOR'S OFFICE  
CLEARFIELD COUNTY COURTHOUSE  
Second & Market Streets  
Clearfield, PA 16830  
Phone (814) 765-2641

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

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00- -CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
Defendant :  
:

COMPLAINT

AND NOW, comes the Plaintiff, TAMARA K. CARTWRIGHT, who by and through her attorney, R. Denning Gearhart, Esquire, files this Complaint and avers as follows:

COUNT I - DIVORCE/IRRETRIEVABLE BREAKDOWN 3301(c)

1. That the Plaintiff, TAMARA K. CARTWRIGHT, is an adult individual who is presently residing at R. R. #2, Box 273, Clearfield, PA 16830.
2. That the Defendant, GARY L. CARTWRIGHT, SR., is an adult individual who is presently residing at c/o Chet Cartwright, R. R. #1, Box 276 A, West Decatur, PA 16878.
3. That Plaintiff has been a bona fide resident in the Commonwealth of Pennsylvania for at least six (6) months immediately prior to filing this Complaint.
4. That Plaintiff and Defendant were married on June 11, 1983, in Clearfield County, Pennsylvania.
5. That the parties have one minor child, namely, Amber Cartwright (d.o.b. 9/8/83).

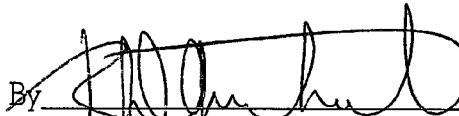
6. There has been no prior action for divorce or annulment instituted by either of the parties in this or any other jurisdiction.

7. That there has been an irretrievable breakdown of the marriage relationship of the parties within the meaning of Act. No. 26 of the Commonwealth of Pennsylvania, Section 3301(c).

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.

Respectfully submitted,

By 

R. Denning Gearhart, Esquire  
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CLEARFIELD :

Before me, the undersigned officer, a Notary Public in and for the above named State and County, personally appeared TAMARA K. CARTWRIGHT, who being duly sworn according to law deposes and says that the facts set forth in the foregoing Complaint in Divorce are true and correct to the best of her knowledge, information and belief.

  
\_\_\_\_\_  
TAMARA K. CARTWRIGHT

Sworn to and subscribed

before me, this 23<sup>rd</sup>

day of February, 2000.

Kathleen A. Ricotta

Notary Public

Notarial Seal  
Kathleen A. Ricotta, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires June 7, 2001

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

TAMARA K. CARTWRIGHT, :  
Plaintiff :  
vs. : No. 00-239-CD  
GARY L. CARTWRIGHT, SR., :  
Defendant :  
:

CASE NUMBER: No.00-239-CD

TYPE OF CASE: Civil/Divorce

TYPE OF PLEADING: ACCEPTANCE OF SERVICE

FILED ON BEHALF OF: Defendant

COUNSEL OF RECORD FOR THIS PARTY: NONE

FILED

MAR 02 2000

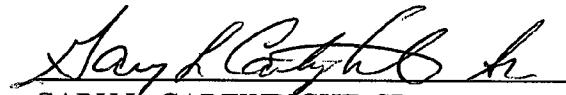
William A. Shaw  
Prothonotary

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

TAMARA K. CARTWRIGHT, :  
Plaintiff :  
: vs. : No. 00-239-CD  
: :  
GARY L. CARTWRIGHT, SR., :  
Defendant :  
:

ACCEPTANCE OF SERVICE

I, GARY L. CARTWRIGHT, SR., Defendant in the above captioned matter, hereby  
acknowledge receipt of a certified copy of the Complaint in Divorce filed in this matter.

  
GARY L. CARTWRIGHT, SR.  
Defendant

DATED: 2/29/08

FILED NO. cc  
MAY 10 1968  
William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION IN DIVORCE  
No. 00-239-CD

TAMARA K. CARTWRIGHT,  
Plaintiff

vs.

CARY L. CARTWRIGHT, SR.,  
Defendant

PRAECIPE TO TRANSMIT THE  
RECORD

FILED  
MAY 25 2000  
NO CC

William A. Shaw  
Prothonotary

R. DENNING GEARHART  
ATTORNEY AT LAW  
CLEARFIELD, PA. 16830

2 CC Decrees to  
Atty Gearhart

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HEALTH  
VITAL RECORDSRECORD OF  
DIVORCE OR ANNULMENT  
 (CHECK ONE) STATE FILE NUMBER  
STATE FILE DATE

COUNTY

## HUSBAND

1. NAME <i>(First) (Middle) (Last)</i> Gary L. Cartwright, Sr.	2. DATE OF BIRTH <i>(Month) (Day) (Year)</i> 11/27/57	
2. RESIDENCE Street or R.D. c/o Chet Cartwright, R.R. 1, Box 276 A, West Decatur, PA	3. PLACE OF BIRTH <i>(State or Foreign Country)</i> PA	
5. NUMBER OF THIS MARRIAGE 2	6. RACE WHITE <input checked="" type="checkbox"/> <input type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	7. USUAL OCCUPATION Unemployed

## WIFE

8. MAIDEN NAME <i>(First) (Middle) (Last)</i> Tamara K. McBride	9. DATE OF BIRTH <i>(Month) (Day) (Year)</i> 6/8/59		
10. RESIDENCE Street or R.D. R. R. 2, Box 273, Clearfield, PA	11. PLACE OF BIRTH <i>(State or Foreign Country)</i> PA		
12. NUMBER OF THIS MARRIAGE 1	13. RACE WHITE <input checked="" type="checkbox"/> <input type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	14. OCCUPATION Housewife	
15. PLACE OF OF THIS MARRIAGE Clearfield County, PA	16. DATE OF THIS MARRIAGE <i>(Month) (Day) (Year)</i> 6/11/83		
17A. NUMBER OF CHIL- DREN THIS MARRIAGE 1	17B. NUMBER OF DEPENDENT CHIL- DREN UNDER 18 1	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 checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>
20. NUMBER OF CHILDREN CUSTODY OF <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	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 Section 3301(c) of the PA Divorce Code	
22. DATE OF DECREE <i>(Month) (Day) (Year)</i>	23. DATE REPORT SENT TO VITAL RECORDS <i>(Month) (Day) (Year)</i>		
24. SIGNATURE OF TRANSCRIBING CLERK			

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

TAMARA K. CARTWRIGHT, Plaintiff :  
VS. : NO. 00-239-CD  
GARY L. CARTWRIGHT, SR., Defendant :

CASE NUMBER: 00-239-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: PETITION TO TRANSMIT THE RECORD

FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE  
Supreme Court I.D. #26540  
215 East Locust Street  
Clearfield, PA 16830  
(814) 765-1581

FILED

MAY 25 2000

William A. Shaw  
Prothonotary

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

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00-239-CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
Defendant :  
:

**PRAECIPE TO TRANSMIT THE RECORD**

TO THE PROTHONOTARY:

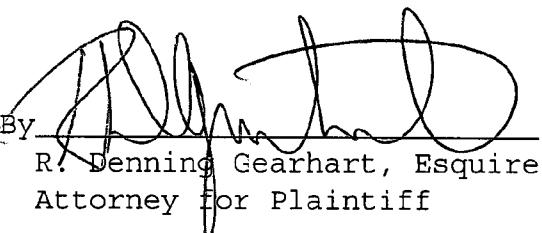
Transmit the record, together with the following information, to the Court for entry of a divorce decree:

1. Ground for divorce: irretrievable breakdown under Section 3301<sup>®</sup> of the Pennsylvania Divorce Code.

2. Defendant received said Complaint by accepting service on February 29, 2000. An Acceptance of Service has been filed with the Prothonotary of Clearfield County.

3. Date of execution of the Affidavit of Consent required by Section 3301<sup>®</sup> of the Pennsylvania Divorce Code: by Plaintiff May 25, 2000; by Defendant May 25, 2000.

Respectfully submitted,

By   
R. Denning Gearhart, Esquire  
Attorney for Plaintiff

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

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00-239-CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
Defendant :

**AFFIDAVIT OF CONSENT**

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed on February 24, 2000.
2. The marriage of Plaintiff and Defendant is irretrievably broken and ninety (90) days have elapsed from the date of filing 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, lawyer's fees or expenses if I do not claim them before a divorce is granted.
5. I have been advised of the availability of counseling and that I may request the court to require as such where a Complaint has been filed under 3301(a), 3301(c) or 3301(d).

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: 5/25/00

  
\_\_\_\_\_  
Tamara K. Cartwright, Plaintiff

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

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00-239-CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
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.

DATE: 5/25/00

Tamara K. Cartwright  
Tamara K. Cartwright, Plaintiff

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

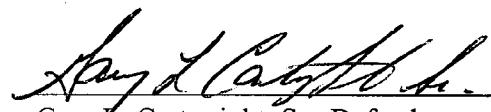
TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00-239-CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
Defendant :  
:

**AFFIDAVIT OF CONSENT**

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed on February 24, 2000.
2. The marriage of Plaintiff and Defendant is irretrievably broken and ninety (90) days have elapsed from the date of filing 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, lawyer's fees or expenses if I do not claim them before a divorce is granted.
5. I have been advised of the availability of counseling and that I may request the court to require as such where a Complaint has been filed under 3301(a), 3301(c) or 3301(d).

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: 5/25/00

  
\_\_\_\_\_  
Gary L. Cartwright, Sr., Defendant

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

TAMARA K. CARTWRIGHT,

Plaintiff

NO. 00-239-CD

VS.

IN DIVORCE

GARY L. CARTWRIGHT, SR.,

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.

DATE: 5/25/00

  
\_\_\_\_\_  
Gary L. Cartwright, Sr., Defendant

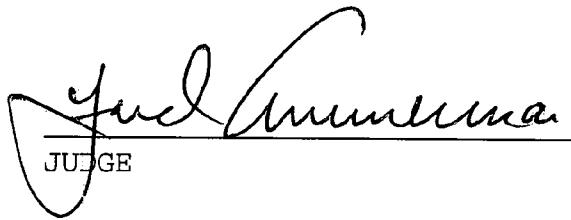
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)

TAMARA K. CARTWRIGHT, :  
Plaintiff : NO. 00-239-CD  
VS. :  
: IN DIVORCE  
GARY L. CARTWRIGHT, SR., :  
Defendant :  
:

DECREE

AND NOW, this 26 day of May, 2000, it is  
Ordered and Decreed that TAMARA K. CARTWRIGHT, Plaintiff, and GARY  
L. CARTWRIGHT, SR., Defendant, are divorced from the bonds of  
matrimony.

BY THE COURT,

  
\_\_\_\_\_  
JUDGE

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

TAMARA K. Cartwright  
PLAINTIFF

vs.

NO. 00-239 CD

Barry L. Cartwright, Sr  
DEFENDANT

NOTICE OF ELECTION TO RETAKE PRIOR NAME

Notice is hereby given that a final Decree in Divorce from the bonds of matrimony has been granted in the above captioned matter on the 26th day of MAY, 19 2000, and that the Plaintiff/Defendant hereby elects to retake and hereafter use her prior name of TAMARA K. McBride, and gives this written notice avowing her intention in accordance with the Act of April 2, 1980, P.L. 63, as amended.

(q4)  
/s/ Tamara K. Cartwright

TO BE KNOWN AS

(q4)  
/s/ Tamara K. McBride

Sworn and subscribed before me this

22nd day of JUNE,  
A.D. 19 2000.

WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2002  
Clearfield Co., Clearfield, PA.

FILED

JUN - 2 2000

William A. Shaw  
Prothonotary

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

TAMARA K. CARTWRIGHT  
Plaintiff

Case No. 00-239-CD

GARY L. CARTWRIGHT, SR.  
Defendant

CERTIFICATE OF ELECTION TO RETAKE PRIOR NAME

Notice is hereby given that a final Decree in Divorce from the bonds of matrimony has been granted in the above captioned matter on the 26TH day of MAY, 2000 and that the Plaintiff TAMARA K. CARTWRIGHT hereby elects to retake and hereafter use her prior name of TMARA K. MCBRIDE, and gives this written notice avowing her intention in accordance with the provisions of 54 Pa.C.S.A. Section 704.

/s/ Tamara K. Cartwright  
TAMARA K. CARTWRIGHT

TO BE KNOWN AS:

/s/ Tamara K. McBride  
TAMARA K. MCBRIDE

Certified from the record this  
JUNE 2, 2000

\_\_\_\_\_  
William A. Shaw, Prothonotary

**FILED**

JUN - 2 2000

**William A. Shaw  
Prothonotary**

FILED  
10/10/2000

William A. Shaw  
Prothonotary

scott b. jones  
rec'd 10/10/2000