

00-694-CD
DENNIS W. COYLE -vs- DONNA M. COYLE

William A. Shaw
Prothonotary

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

DENNIS W. COYLE,	:		
Plaintiff	:	NO. 00-	-CD
VS.	:		
	:	IN DIVORCE	
DONNA M. COYLE,	:		
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)

DENNIS W. COYLE,	:		
Plaintiff	:	NO. 00-	-CD
VS.	:		
	:	IN DIVORCE	
DONNA M. COYLE,	:		
Defendant	:		

COMPLAINT

AND NOW, comes the Plaintiff, DENNIS W. COYLE, who by and through his attorney, R. Denning Gearhart, Esquire, files this Complaint and avers as follows:

COUNT I - DIVORCE/IRRETRIEVABLE BREAKDOWN 3301(c)

1. That the Plaintiff, DENNIS W. COYLE, is an adult individual who is presently residing at R. D. 1, Box 133, Curwensville, Clearfield County, Pennsylvania 16833.
2. That the Defendant, DONNA M. COYLE, is an adult individual who is presently residing at c/o Tina McFarland, Owens Street, Kerr Addition, Clearfield, Clearfield County, Pennsylvania 16830.
3. That 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 Plaintiff and Defendant were married on November 4, 1989, in the State of New Jersey.

5. That there were two children born of this marriage, namely, Dennis W. Coyle, Jr. (d.o.b. 7/6/89), and Stanley A. Coyle (d.o.b. 11/19/90).

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.

COUNT II - CUSTODY

9. That Paragraphs One (1) through Eight (8) of this Complaint are incorporated herein by reference as though set forth in full.

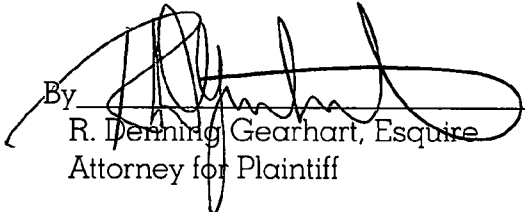
10. That there are no other proceedings pending involving custody of the parties' minor children in any other Court in this state or any other state, and Plaintiff knows of no person not a party to these proceedings who has physical custody of the children, or who claims to have custody or visitation rights with regard to the said minor children.

11. That Plaintiff believes that the best interests of the children would be served by having him being granted custody of the said minor children.

12. That for the last five years the above named children have resided with both parents in the Curwensville area.

WHEREFORE, Plaintiff requests your Honorable Court to grant him custody of Dennis W. Coyle, Jr., (d.o.b. 7/6/89) and Stanley A. Coyle (d.o.b. 11/19/90), and to issue a Rule upon Defendant to show cause why such prayer should not be granted.

Respectfully submitted,

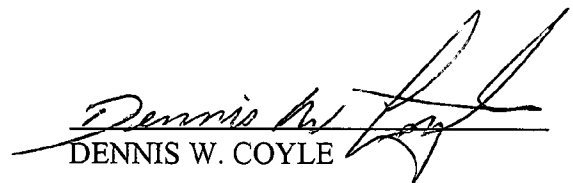
By 
R. Denning Gearhart, Esquire
Attorney for Plaintiff

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 DENNIS W. COYLE 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 his knowledge, information and belief.


DENNIS W. COYLE

Sworn to and subscribed

before me, this 6th

day of June, 2000.



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 IN DIVORCE

DENNIS W. COYLE,
Plaintiff

vs.

DONNA M. COYLE,
Defendant

COMPLAINT IN DIVORCE

FILED

FILED
JUN 09 2000
By *012051* atty *urbanhart*
William A. Shaw
Prothonotary

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

COMMERCIAL PRINTING CO., CLEARFIELD, PA.

Sec atty urbanhart
PD \$95.00

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

DENNIS W. COYLE,	:	
Plaintiff	:	
VS.	:	NO. 00-694-CD
	:	
DONNA M. COYLE,	:	
Defendant	:	

CASE NUMBER: 00-694-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: AFFIDAVIT OF MAILING

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

JUN 13 2000

William A. Shaw
Prothonotary

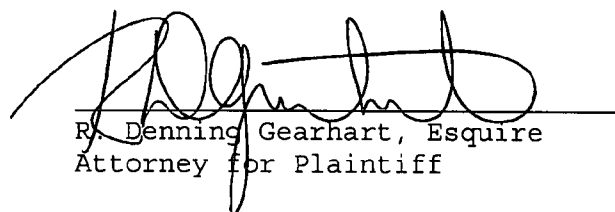
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DENNIS W. COYLE, :
Plaintiff :
VS. : NO. 00-694-CD
DONNA M. COYLE, :
Defendant :

AFFIDAVIT OF MAILING

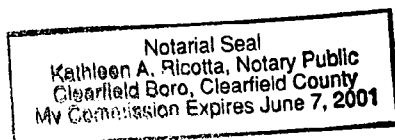
COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF CLEARFIELD : SS.

R. Denning Gearhart, Esquire, the attorney for Plaintiff, being duly sworn according to law, says that he mailed by certified mail, restricted delivery, return receipt requested, a true and correct copy of the Complaint For Divorce filed in the above action, to the Defendant, at her place of residence as evidenced by the signed receipt attached hereto as Exhibit 'A'. Included in that mailing was a copy of the Clearfield County Administrative Order of Court dated March 24, 1995, concerning the Children First Program, as well as a brochure from Yola Nola Concerns, Inc., of DuBois, PA, regarding registration for the program.


R. Denning Gearhart, Esquire
Attorney for Plaintiff

Sworn to and Subscribed
before me this 12 day
of June, 2000.


Kathleen A. Ricotta
Notary Public



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Received by (Please Print Clearly) <u>DONNA COYLE</u> B. Date of Delivery</p> <p>C. Signature <u>X Donna Coyle</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><input checked="" type="checkbox"/> Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p><u>Donna M. Coyle</u> <u>40 Tina McFarland</u> <u>Owens Street</u> <u>Kerr Addition</u> <u>Clearfield, PA 16830</u></p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Copy from service label)</p> <p><u>7099 3400 0002 7593 3904</u></p>		<p>4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes</p>	

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION No. 00-694-CD

DENNIS W. COYLE,
Plaintiff

vs.

DONNA M. COYLE,
Defendant

AFFIDAVIT OF MAILING

FILED

JUN 13 2000

010351 *APCC*
William A. Shaw
Prothonotary *WAS*

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

CORRECTIONAL PRINTING CO., CLEARFIELD, PA

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

DENNIS W. COYLE, SR. :
VS. : NO. 00-694-CD
DONNA M. COYLE :

O R D E R

NOW, this 7th day of July, 2000, this Court being advised that a complaint in divorce with a count for custody has been filed to the above caption, and the parties, through their attorneys, R. Denning Gearhart, Esquire, for the Plaintiff, and Stephen Fleming, Esquire, Mid-Penn Legal Services, for the Defendant, having advised that the same should be scheduled for a custody mediation conference, the Court shall do so under separate order. In the interim, the parties shall enjoy joint physical and legal custody of the minor children, Dennis W. Coyle, Jr. (d.o.b. 7/6/89) and Stanley A. Coyle (d.o.b. 11/19/90), with the father having physical custody from each Thursday night at 7:00 p.m. until the following Monday morning at 9:00, a.m. The party receiving custody shall provide transportation.

BY THE COURT,

FILED

JUL 10 2000
01:27:17 pm
William A. Shaw
Prothonotary


Judge

FILED

JUL 10 2000
01:17 PM
William A. Shaw
Prothonotary

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

DENNIS COYLE,
Plaintiff

vs.

DONNA M. COYLE,
Defendant and
Third Party Plaintiff

vs.

THOMAS GEORGE BOWERS, JR.,
Third Party Defendant

: No.:00-694-CD

: Type of Case:
: **Custody**

: Type of Document:
: **Petition for Special Relief**

: Filed on Behalf of:
: **Donna M. Coyle,**
: **Defendant/Third Party Plaintiff**

: Counsel of Record for this Party:

: MIDPENN LEGAL SERVICES, INC.

: by Stephen C. Fleming, Esq. #83254
: 2054 East College Avenue
: State College, PA 16801
: (814) 238-4958

FILED

JUL 25 2000

William A. Shaw
Prothonotary

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

DENNIS COYLE,	:	No.:00-694-CD
Plaintiff,	:	
vs.	:	
DONNA M. COYLE,	:	CUSTODY
Defendant/Third Party Plaintiff.	:	PETITION FOR SPECIAL RELIEF
vs.	:	
THOMAS GEORGE BOWERS, JR.,	:	
Third Party Defendant	:	

ORDER RE: PETITION FOR SPECIAL RELIEF

AND NOW this ____ day of July, 2000, upon consideration of Defendant-Petitioner Donna Coyle's *Petition for Special Relief*, it is hereby ordered that:

1. Primary custody of the minor child, VEDA ~~SIJ~~JALKOWSKI, be granted to Defendant-Petitioner Donna Coyle;
2. Contact between Plaintiff Dennis Coyle and the minor child, VEDA ~~SIJ~~JALKOWSKI, be as permitted by Defendant-Petitioner Donna Coyle;
3. A hearing/conference relating to the custody of VEDA ~~SIJ~~JALKOWSKI be set expeditiously.

BY THE COURT:

The Honorable Frederic J. Ammerman
Judge, Clearfield County Court of Common Pleas

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

DENNIS COYLE,
Plaintiff,

vs.

DONNA M. COYLE,
Defendant.

vs.

THOMAS GEORGE BOWERS, JR.,
Defendant

No.:00-694-CD

CUSTODY
PETITION FOR SPECIAL RELIEF

RULE TO SHOW CAUSE

Now this _____ day of _____, 2000, upon consideration of the attached *Petition for Special Relief*, a Rule is hereby issued upon DENNIS COYLE and THOMAS GEORGE BOWERS, JR. _____ to show cause why the Petition should not be granted. Rule returnable the _____ day of _____, 2000, for filing written response.

NOTICE

A PETITION OR MOTION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING ***PETITION FOR SPECIAL RELIEF*** BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE A CASE MAY PROCEED WITHOUT YOU AND AN ORDER AMY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR RELIEF REQUESTED BY THE PETITIONER OR MOVANT. YOU MAY LOSE RIGHTS IMPORTANT TO YOU.

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

BY THE COURT:

The Honorable Frederic J. Ammerman
Judge, Clearfield County Court of Common Pleas

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

DENNIS COYLE,	:	No. 00-694-CD
Plaintiff,	:	
vs.	:	
DONNA M. COYLE,	:	CUSTODY
Defendant/Third Party Plaintiff	:	PETITION FOR SPECIAL RELIEF
vs.	:	
THOMAS GEORGE BOWERS, JR.,	:	
Third Party Defendant	:	

PETITION FOR SPECIAL RELIEF

COMES NOW, Defendant-Petitioner, Donna M. Coyle, through counsel, MIDPENN LEGAL SERVICES, INC., with her *Petition for Special Relief* pursuant to Pa.R.C.P. No. 1915.13 ("Actions for Custody-Special Relief") requesting that she be granted an *ex-parte* order for custody of the minor child VEDA SIJALKOWSKI and that her *Complaint for Custody* be set expeditious for a hearing/conference and as grounds states:

1. Pennsylvania Rules of Civil Procedure Number 1915.13 reads in pertinent part: "at any time after commencement of the action, the court may ...grant appropriate interim or special relief." Pa.R.C.P. No. 1915.13 ("Actions for Custody-Special Relief").
2. Under this rule, the Court has broad power to fashion remedies for the just and speedy resolution of issues that would promote the best interests of the children. Pa.R.C.P. No. 1915.13 Explanatory Note - 1981. Such relief would include remedial orders, appropriate *ex-parte* action, and scheduling matters for priority or expeditious handling.
3. This matter was originally filed with regard to the custody of Dennis Coyle, Jr., and Stanley Coyle, the minor children of Plaintiff Dennis Coyle and Defendant Donna Coyle.
4. Defendant Donna Coyle has an older child to a previous relationship, VEDA SIJALKOWSKI (15 years old), that has resided with Plaintiff Dennis Coyle and Defendant Donna Coyle for approximately the last ten years.
5. VEDA SIJALKOWSKI's natural father is Thomas George Bowers, Jr.; however, VEDA SIJALKOWSKI has not seen her natural father for several years.
6. Although Plaintiff Dennis Coyle is not VEDA SIJALKOWSKI's natural father, he

likely has standing to participate in a custody matter concerning VEDA SIJALKOWSKI.

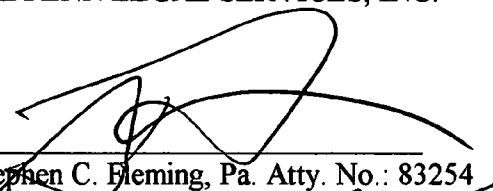
7. VEDA SIJALKOWSKI visited with Plaintiff Dennis Coyle at his home on July 13, 2000. Since that time, VEDA SIJALKOWSKI has been in his possession. Plaintiff Dennis Coyle refuses to permit Defendant Donna Coyle to see or talk with the child.
8. While the child has been in Plaintiff's care, her conduct has not been appropriately supervised. She has been permitted to date men 21 years of age or older and to remain out until the late evening and even early morning hours. She does not have appropriate care or supervision of her conduct for when she is in the care of Plaintiff.
9. Defendant Donna Coyle is and has been the primary caretaker of the child her entire life, even when the parties were residing together.
10. Although some continued contact with Plaintiff is probably appropriate for the child's relationship to Plaintiff as her step-father and father-figure, primary custody of the child should be with Defendant Donna Coyle.
11. It is appropriate to resolve the custody dispute concerning VEDA SIJALKOWSKI under this existing custody action between the parties and to join VEDA SIJALKOWSKI's natural father, Thomas George Bowers, Jr., as a third party defendant to the action.
12. Along with this *Petition for Special Relief*, Defendant-Petitioner Donna Coyle has simultaneously filed her *Complaint for Custody*.
13. It is in the best interest of the minor child that primary custody be granted to Plaintiff-Petitioner and that any contact with Defendant-Respondent be restricted to supervised visits as Defendant-Respondent is unable to appropriately care for the child on his own ~~and has demonstrated a resistance to complying with specific court orders without supervision.~~
14. Consistent with the local practice rules of the Clearfield County Court Rule No. 206(d) (Court of Common Pleas of Clearfield County, 46th Judicial District, Commonwealth of Pennsylvania, Rules of Civil Procedure; 46 J.D.R.C.P. Rule 206) regarding procedures for *ex-parte* relief, counsel for Plaintiff has attempted to notify Defendant of its intent to present this *Petition*.

WHEREFORE, Plaintiff-Petitioner requests that this Court enter an appropriate *ex-parte* order granting primary custody of VEDA SIJALKOWSKI to her and restricting contact between VEDA SIJALKOWSKI and Plaintiff periods of time as restricted and regulated by Defendant Donna Coyle; and that the underlying *Complaint for Custody* be set for

hearing/conference as expeditiously as the Court's schedule will allow.

Respectfully submitted this 29 day of July, 2000.

MIDPENN LEGAL SERVICES, INC.



Stephen C. Fleming, Pa. Atty. No.: 83254

Counsel for DONNA COYLE

MidPenn Legal Services, Inc.

2054 East College Avenue

State College, PA 16801

(814) 238-4958

VERIFICATION OF PETITION FOR SPECIAL RELIEF

I verify that the statements made in this *Petition for Special Relief* 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.

7-25-00

Date

Donna M. Coyle

Donna Coyle

Defendant-Petitioner

(5)

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

DENNIS COYLE,

Plaintiff

vs.

DONNA M. COYLE,

Defendant/Third Party Plaintiff

vs.

THOMAS GEORGE BOWERS, JR.,

Third Party Defendant

: No.: 00-694-CD

: Type of Case:

: **Custody**

: Type of Document:

: **Complaint for Custody**

: Filed on Behalf of:

: **Donna M. Coyle,**

: **Defendant/ Third Party Plaintiff**

: Counsel of Record for this Party:

: MIDPENN LEGAL SERVICES, INC.

: by Stephen C. Fleming, Esq. #83254

: 2054 East College Avenue

: State College, PA 16801

: (814) 238-4958

FILED

APR 25 2000

A. Shaw
Protonotary

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

DENNIS COYLE,	:	No.:00-694-CD
Plaintiff,	:	
vs.	:	
DONNA M. COYLE,	:	CUSTODY
Defendant/Third Party Plaintiff.	:	
vs.	:	
THOMAS GEORGE BOWERS, JR.,	:	
Third Party Defendant	:	

COMPLAINT FOR CUSTODY

1. This action was originally filed by Plaintiff with regard to Dennis Coyle Jr and Stanley Coyle, the natural children of Plaintiff and Defendant Donna Coyle.
2. Defendant Donna Coyle also a child to a previous relationship, Veda Bijalkowski, that has resided with Plaintiff and Defendant Donna Coyle for approximately the past ten years.
3. A custody dispute has arisen between the parties with regard to Veda Bijalkowski and it is appropriate to add her this existing action and join her natural father Thomas George Bowers, Jr., as a third party defendant.
4. Plaintiff is Dennis Coyle residing at RR 1 Box 133 Curwensville, Clearfield County, Pennsylvania, 16833.
5. Defendant/Third Party Plaintiff Donna Coyle resides at RR #1 Box 89-A, Clearfield, Clearfield County, Pennsylvania, 16830.
6. Third Party Defendant Thomas George Bowers, Jr., resides at 13 Inverness Circle, Marlton, NJ, 08053
7. Defendant/Third Party Defendant Donna Coyle seeks custody of the following child: Veda Bijalkowski

<i>Name</i>	<i>Present Residence</i>	<i>Age</i>
Veda Bijalkowski	RR #1 Box 89-A, Clearfield, PA 16830	15

The child was born out of wedlock.

The child is presently in the custody of Plaintiff Dennis Coyle residing at RR 1 Box 133 Curwensville, Clearfield County, Pennsylvania, 16833.

During the past five years, the child has resided with the following persons and at the following addresses:

<i>Name</i>	<i>Address</i>	<i>Dates</i>
Dennis Coyle	RR 1 Box 133 Curwensville, PA 16833	7/13/00-present
Donna Coyle	RR #1 Box 89-A, Clearfield, PA 16830	6/5/00-7/13/00
Dennis Coyle and Donna Coyle	RR 1 Box 133 Curwensville, PA 16833	1997-6/5/00
Donna Coyle	Nichols Street, Clearfield, PA 16830	1996-1997
Dennis Coyle and Donna Coyle	RR 1 Box 133 Curwensville, PA 16833	1995-1997

The mother of the child is Defendant Donna Coyle residing at RR #1 Box 89-A, Clearfield, Clearfield County, Pennsylvania, 16830

She is married.

The father of the child is Third Party Defendant Thomas George Bowers, Jr., who resides at 13 Inverness Circle, Marlton, NJ, 08053

It is unknown if he is married.

8. The relationship of Plaintiff to the child is that of step-father. The Plaintiff currently resides with the following persons:

<i>Name</i>	<i>Relationship</i>
unknown	

9. The relationship of Defendant Donna Coyle to the child is that of natural mother. Defendant Donna Coyle currently resides with the following persons:

<i>Name</i>	<i>Relationship</i>
Denny Coyle	Son
Stanley Coyle	Son
Kimberly Coyle	Daughter

10. The relationship of Third Party Defendant Thomas George Bowers, Jr., to the child is that of natural father. Third Party Defendant Thomas George Bowers, Jr., currently resides with the following persons:

<i>Name</i>	<i>Relationship</i>
-------------	---------------------

unknown

11. Plaintiff has participated as a party or witness, or in another capacity, in other litigation concerning the custody of the child in this or another court. The court, term and number, and its relationship to this action is: none

Plaintiff has no other information of a custody proceeding concerning the child pending in a court of this Commonwealth. The court, term and number, and its relationship to this action is: none

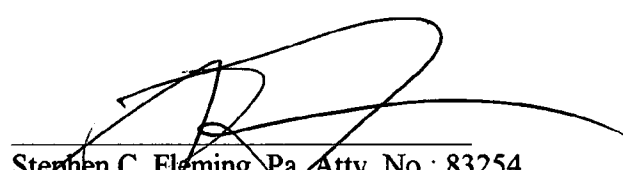
Plaintiff does not know of a person not a party to the proceedings who has physical custody of the child or claims to have custody or visitation rights with respect to the child. The name and address of such person is:

12. The best interest and permanent welfare of the child will be served by granting the relief requested because: Defendant has acted as the primary caretaker of the Veda Sijalkowski her entire life, even while the parties resided together. While in Plaintiff's care, Veda Sijalkowski does not have appropriate adult supervision of her conduct and is permitted to engage in inappropriate activities.
13. Each parent whose parental rights to the child have not been terminated and the person who has physical custody of the child have been named as parties to this action. All other persons, named below, who are known to have or claim a right to custody or visitation of the child will be given notice of the pendency of this action and the right to intervene: none.

WHEREFORE, Defendant/Third Party Plaintiff, requests the Court to grant her custody of the Veda Sijalkowski.

Respectfully submitted this 25 day of July, 2000.

MIDPENN LEGAL SERVICES, INC.


Stephen C. Fleming, Pa. Atty. No.: 83254
Counsel for Defendant/Third Party Plaintiff Donna Coyle
MidPenn Legal Services, Inc.
2054 East College Avenue
State College, PA 16801
(814) 238-4958

VERIFICATION

I verify that the statements made in this document 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.

7-25-00

Date



Donna Coyle

Defendant/Third Party Plaintiff

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

DENNIS COYLE,	:	No. 00-694-CD
Plaintiff,	:	
vs.	:	
DONNA M. COYLE,	:	CUSTODY
Defendant/Third Party Plaintiff.	:	
vs.	:	
THOMAS GEORGE BOWERS, JR.,	:	
Third Party Defendant	:	

ORDER OF COURT

You , DENNIS COYLE, Plaintiff, and THOMAS GEORGE BOWERS, JR., Defendant, have been sued in court to obtain custody of the child: VEDA SIJALKOWSKI

You are ordered to appear in person the 31st day of August, 2000, at 1:00 p.m. in Courtroom 2 of the Clearfield County Courthouse for a Hearing.

You are also ordered to bring the child with you to said Hearing and to not remove the child from the jurisdiction of Clearfield County, Pennsylvania.

~~Pending further Order of Court, custody of the said child shall be in Defendant Donna Coyle.~~ **FJA**

If you fail to appear as provided by this Order, an Order for Custody, Partial Custody, or Visitation may be entered against you or the Court may issue a warrant for your arrest.

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


FILED

JUL 31 2000

William A. Shaw
Prothonotary

7/31/00
Date

BY THE COURT


The Honorable Frederic J. Ammerman
Judge, Clearfield County Court of Common Pleas

AMERICANS WITH DISABILITIES ACT OF 1990

The Court to Common Pleas of Clearfield County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the Court, please contact our office. All arrangements must be made at least 72 hours prior to any hearing or business before the Court. You must attend the scheduled conference or hearing.

BY THE COURT:

Date

The Honorable Frederic J. Ammerman
Judge, Clearfield County Court of Common Pleas

(F)
(7)

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

DENNIS COYLE,
Plaintiff

vs.

DONNA M. COYLE,
Defendant

vs.

THOMAS GEORGE BOWERS, JR.,
Defendant

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NO. 2000-694-C.D.

O R D E R

NOW, this 2nd day of August, 2000, upon consideration of the Petition for Special Relief filed by Attorney Stephen C. Fleming on behalf of Defendant Donna M. Coyle, it is the ORDER of this Court as follows:

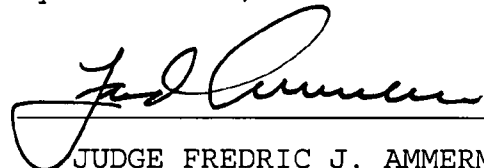
1. Donna M. Coyle, the child's natural mother, shall have custody of the minor child Veda Fijalkowski;
2. Dennis Coyle, the child's stepfather, shall have partial custody from noon each Saturday until 6:00 p.m. the next day (Sunday);
3. Dennis Coyle shall make arrangements to turn possession of the child back over to Defendant Donna M. Coyle;
4. The Court will issue separate Order requiring the parties to attend a Custody Conference.

FILED

AUG 04 2000

William A. Shaw
Prothonotary

By the Court,


JUDGE FREDRIC J. AMMERMAN

FILED

AUG 04 2000

O.P. O.S. /
William A. Shaw
Prothonotary

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McCath, Fleming

McC. Dy. Boudens

E. Kent

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


DENNIS COYLE,	:	No.:00-694-CD
Plaintiff,	:	
vs.	:	
DONNA M. COYLE,	:	CUSTODY
Defendant/Third Party Plaintiff.	:	MOTION TO WAIVE FEES
vs.	:	
THOMAS GEORGE BOWERS, JR.,	:	
Third Party Defendant	:	

PRAECIPE TO PROCEED IN FORMA PAUPERIS

To the Prothonotary:

Kindly allow DONNA COYLE to proceed *in forma pauperis*.

I, Stephen C. Fleming, attorney for the party proceeding *in forma pauperis*, certify that I believe the party is unable to pay the costs and that I am providing free legal service to the party. The party's affidavit showing inability to pay the costs of litigation is attached hereto.



Stephen C. Fleming, Pa. Atty. No.: 83254
Attorney for Donna Coyle
MidPenn Legal Services, Inc.
2054 East College Avenue
State College, PA 16801
(814) 238-4958

FILED

AUG 11 2000
m/12:30/47
William A. Shaw
Prothonotary
NO C/C
EAB

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

DENNIS COYLE,
Plaintiff

vs.

DONNA M. COYLE,
Defendant and
Third Party Plaintiff

vs.

THOMAS GEORGE BOWERS, JR.,
Third Party Defendant

: No.:00-694-CD
:
: Type of Case:
: **Custody**
:
: Type of Document:
: **Motion to Waive Mediation Conference**
: **Fees**
:
: Filed on Behalf of:
: **Donna M. Coyle,**
: **Defendant/Third Party Plaintiff**
:
: Counsel of Record for this Party:
:
:
:
:
:
: MIDPENN LEGAL SERVICES, INC.
:
: by Stephen C. Fleming, Esq. #83254
: 2054 East College Avenue
: State College, PA 16801
: (814) 238-4958

FILED

AUG 11 2000
ml 12:30/mt
William A. Shaw
Prothonotary
no c/c.
E 125

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

DENNIS COYLE,	:	No.:00-694-CD
Plaintiff,	:	
vs.	:	
DONNA M. COYLE,	:	CUSTODY
Defendant/Third Party Plaintiff.	:	MOTION TO WAIVE FEES
vs.	:	
THOMAS GEORGE BOWERS, JR.,	:	
Third Party Defendant	:	

MOTION TO WAIVE MEDIATION CONFERENCE FEES

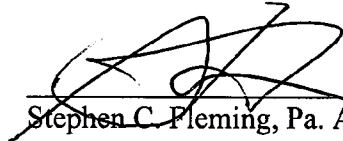
COMES NOW, Defendant/Third-Party Plaintiff, DONNA COYLE, with her *Motion to Waive Mediation Conference Fees* and as grounds states:

1. In its Order dated July 10, 2000, this Court ordered the parties to participate in a custody mediation conference and that each party pay \$150 towards the associated costs.
2. Donna Coyle is indigent and without sufficient means to bear the costs of the mediation. Please see attached *Affidavit in Support of Petition to Proceed in Forma Pauperis*.
3. Based on her annual income of approximately \$4,000, Donna Coyle qualifies for free legal services of MidPenn Legal Services under the program's income eligibility guidelines.
4. The Pennsylvania Rules of Civil Procedure contemplate that a person without sufficient resources should not be prevented from participating in an action on that basis and should be permitted to proceed without payment of associated costs. Pa.R.C.P. Rule 240 (b) states in pertinent part: "A party who is without financial resources to pay the costs of litigation is entitled to proceed in forma pauperis."

WHEREFORE, Defendant/Third Party Plaintiff Donna M. Coyle requests that any costs to her associated with the custody mediation conference be waived.

Respectfully submitted this August 10, 2000.

MIDPENN LEGAL SERVICES, INC.



Stephen C. Fleming, Pa. Atty. No.: 83254
Counsel for Donna Coyle
MidPenn Legal Services, Inc.
2054 East College Avenue
State College, PA 16801
(814) 238-4958

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Donna M. Coyle,
Plaintiff

vs.

Dennis W. Coyle,
Defendant

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* No. 00 - 694 - CD

AFFIDAVIT IN SUPPORT OF
PETITION TO PROCEED IN FORMA PAUPERIS

(1). I am the Plaintiff in the above matter and because of my financial condition am unable to pay the fees and costs of prosecuting or defending the action or proceeding.

(2). I am unable to obtain funds from anyone, including my family and associates, to pay the costs of litigation.

(3). I represent that the information below relating to my ability to pay the costs and fees is true and correct.

(a). Name: Donna M. Coyle

Address: RR #1, Box 89-A, Clearfield, PA 16830

Social Security No.: 150-58-7372

(b). Employment

If you are presently employed, state: NO

Employer: N/A

Address: N/A

Salary or wages per month: N/A

Type of Work: N/A

If you are presently unemployed, state:

Date of last employment: 02-2000

Salary or wages per month: \$903.00 monthly

Type of work: Personal Care

(c). Other income within the past twelve months:

Business or Profession: No

Other self-employment: No

Interest: No

Dividends: No

Pension and annuities: No

Social Security benefits: No

Support payments: \$340 monthly

Disability Payments: No

Unemployment Compensation and Supplemental
benefits: No

Workmen's Compensation: No

Public Assistance: Foodstamps \$400 monthly

Other: No

(d). Other contriutions to household support:

(Wife)(Husband) Name: No

If your (Wife)(Husband) is employed, state:

Employer: N/A

Salary or wage per month: N/A

Type of work: N/A

Contributions from children: No

Contributions from parents: No

Other contributions: No

(e). Property owned:

Cash: No

Checking Account: No

Savings Account: No

Certificates of Deposit: No

Real Estate (including home): No

Motor Vehicle: Make: Oldsmobile Cutlas Year: 1987
Cost: \$1500.00
Amount Owed: \$1300.00

Stocks, bonds: No

Other: No

(f). Debts and obligations:

Mortgage: No

Rent: \$67.00 monthly

Loans: Car loan - \$200.00 mo.

Other: Telephone - \$15.00 mo., Cable - \$60.00 mo.

(g). Persons dependent upon you for support:

(Wife)(Husband) Name: No

Children, if any:

Name:

Age:

Veda Fijalkowski 15 yrs.

Kimberly Fijalkowski 12 yrs.

Dennis Coyle, Jr. 11 yrs.

Stanley Coyle 9 yrs.

Other persons dependent on you: None

Name	Relationship
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(4). I understand that I have a continuing obligation to inform the Court of improvements in my financial circumstances which would permit me to pay the costs incurred herein.

(5). 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.

7-31-00
Date

Donna M. Coyle
Petitioner

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

DENNIS COYLE,
Plaintiff,

vs.

DONNA M. COYLE,
Defendant/Third Party Plaintiff.

vs.

THOMAS GEORGE BOWERS, JR.,
Third Party Defendant

No.:00-694-CD

CUSTODY
MOTION TO WAIVE FEES

ORDER RE: MOTION TO WAIVE MEDIATION CONFERENCE FEES

AND NOW, this ____ day of _____, 2000, upon consideration of the Defendant/Third Party Plaintiff Donna Coyle's *Motion to Waive Mediation Conference Fees*, it is hereby:

ORDERED AND DECREED that the Defendant/Third Party Plaintiff Donna Coyle be permitted to participate in the custody mediation conference in this matter without payment of the associated costs.

The Honorable Frederic J. Amerman
Judge, Clearfield County Court of Common Pleas

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

DENNIS COYLE,
Plaintiff,

vs.

DONNA M. COYLE,
Defendant/Third Party Plaintiff.

vs.

THOMAS GEORGE BOWERS, JR.,
Third Party Defendant

No.:00-694-CD

CUSTODY
MOTION TO WAIVE FEES

ORDER RE: MOTION TO WAIVE MEDIATION CONFERENCE FEES

AND NOW, this ____ day of _____, 2000, upon consideration of the Defendant/Third Party Plaintiff Donna Coyle's *Motion to Waive Mediation Conference Fees*, it is hereby:

ORDERED AND DECREED that the Defendant/Third Party Plaintiff Donna Coyle be permitted to participate in the custody mediation conference in this matter without payment of the associated costs.

The Honorable Frederic J. Amerman
Judge, Clearfield County Court of Common Pleas

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

DENNIS W. COYLE, SR.,
Plaintiff

vs.

DONNA M. COYLE,
Defendant

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00-694-CD *
No. ~~1996-1514-C.D.~~

* Per Court Order
of Aug. 04, 2000

ORDER

NOW, this 11th day of August, 2000, the above named **DEFENDANT**, having failed to pay the Custody Mediation Fee pursuant to Order dated July 10, 2000, unless the above named **DEFENDANT** pays the fee due the Court Administrator in the amount of One Hundred Fifty Dollars (\$150.00) [by MONEY ORDER ONLY] before August 24, 2000, it is the ORDER of this Court that a hearing to show cause why said **DEFENDANT** shall not be held in contempt of Court for failure to comply with said previous Order is scheduled for the 28th day of August, 2000 at 3 o'clock p.m. in Court Room No. 2 of the Clearfield County Courthouse, Clearfield, Pennsylvania at which time the **DEFENDANT** must be present or a Bench Warrant may be issued for her arrest.

BY THE COURT,

FILED

AUG 11 2000

William A. Shaw
Prothonotary



FREDRIC J. AMMERMAN
JUDGE

FILED

AUG 11 2000

0/4:00/10

William A. Shaw

Prothonotary

CR
KAB

- 1 uncertified copy to Stephen Fleming, Esquire
- 1 uncertified copy to R. Denning Gearhart, Esquire
- 1 uncertified copy to Judge Fredric J. Ammerman

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

DENNIS COYLE,
Plaintiff,

vs.

DONNA M. COYLE,
Defendant/Third Party Plaintiff.

vs.

THOMAS GEORGE BOWERS, JR.,
Third Party Defendant

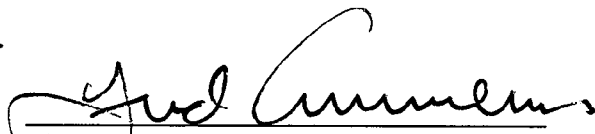
No.:00-694-CD

CUSTODY
MOTION TO WAIVE FEES

ORDER RE: MOTION TO WAIVE MEDIATION CONFERENCE FEES

AND NOW, this 15 day of August, 2000, upon consideration of the Defendant/Third Party Plaintiff Donna Coyle's *Motion to Waive Mediation Conference Fees*, it is hereby:

ORDERED AND DECREED that the Defendant/Third Party Plaintiff Donna Coyle be permitted to participate in the custody mediation conference in this matter without payment of the associated costs.



The Honorable Frederic J. Amerman
Judge, Clearfield County Court of Common Pleas

FILED

AUG 16 2000

6/9.00/war
William A. Shaw
Prothonotary

1 CENT TO ATTY



ORIGINAL (11)

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

DENNIS W. COYLE, SR.,
Plaintiff

VS.

DONNA M. COYLE,
Defendant

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NO. 2000-694-C.D.

O R D E R

NOW, this 23rd day of August, 2000, the parties having provided to the Court Administrator of Clearfield County the required deposit, it is ORDERED that the Custody Mediation Conference be held before Allen H. Ryen, Ph.D., Licensed Child Psychologist, on September 20, 2000 at 9:00 o'clock a.m. at the Clearfield County Courthouse.

Please enter the Courthouse through the front door, turn left and take stairs to second floor. Courtroom No. 2 and waiting area are at the top of the stairs. Both parents, their respective counsel and the child(ren) shall attend said conference. The present custodial parent shall provide someone to attend to the child(ren) while the parent is in private conference.

FAILURE OF A PARTY TO APPEAR FOR THE MEDIATION CONFERENCE WILL RESULT IN ASSESSMENT ON THAT OFFENDING PARTY OF ALL COSTS, UNLESS SAID PARTY HAS NOTIFIED THE CLEARFIELD COUNTY COURT ADMINISTRATOR (814) 765-2641, extension 5982 AT LEAST *** SEVEN (7) *** FULL BUSINESS DAYS IN ADVANCE OF THE SCHEDULED MEDIATION CONFERENCE AND THE COURT ADMINISTRATOR HAS AGREED TO A CONTINUANCE/RESCHEDULING.

FILED

AUG 24 2000

William A. Shaw
Prothonotary

BY THE COURT,



JUDGE FREDRIC J. AMMERMAN

Attorney for the Plaintiff: R. Denning Gearhart, Esquire
Attorney for the Defendant: Stephen Fleming, Esquire

111015

FILED
AUG 24 2000
09:42
William A. Shaw
Prothonotary

- 2 uncertified copies to R. Denning Gearhart, Esquire
- 2 uncertified copies to Stephen Fleming, Esquire
- 1 uncertified copy to Judge Fredric J. Ammerman
- 1 uncertified copy to Court Administrator
- 1 uncertified copy to Allen H. Ryen, Ph.D.

William A. Shaw

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

DENNIS W. COYLE,
Plaintiff

vs.

DONNA M. COYLE,
Defendant

vs.

THOMAS GEORGE BOWERS, JR.,
Defendant

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NO. 2000-694-C.D.

O R D E R

NOW, this 31st day of August, 2000, this being the date set for hearing on Defendant Donna M. Coyle's Petition for Special Relief filed July 31, 2000 by Attorney Stephen C. Fleming; counsel for neither party having appeared; Attorney Stephen C. Fleming having failed to notify the Court that the matter was settled, therefore, it is the ORDER of this Court that Defendant's Petition for Special Relief be and is hereby DISMISSED.

FILED

SEP 01 2000

William A. Shaw
Prothonotary

By the Court,



JUDGE FREDRIC J. AMMERMAN

FILED

SEP 01 2000
01/29/00
William A. Shaw
Prothonotary

2 certified copies to Stephen Fleming, Esquire
2 certified copies to R. Denning Gearhart, Esquire
1 uncertified copy to Court Administrator

William A. Shaw

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

DENNIS W. COYLE, SR. :
 VS. : NO. 00-694-CD
 DONNA M. COYLE :
 VS. :
 THOMAS GEORGE BOWERS, JR. :

O R D E R

NOW, this 20th day of September, 2000, this being the date set for mediation conference; and Thomas George Bowers, Jr., having failed to appear at this or any other related proceeding despite having gotten notice thereof; the remaining parties hereby stipulate as follows for purposes of the entry of a Court Order:

1. Dennis W. Coyle, Sr., and Donna M. Coyle shall enjoy joint legal custody of Dennis W. Coyle, Stanley A. Coyle, Veda Fijalkowski and Kimberly Coyle.
2. Physical custody of Dennis and Stanley shall be with Dennis W. Coyle, Sr., from Monday at 9:00 a.m. until Thursday at 7:00 p.m. All other times of physical custody shall be with Donna M. Coyle.
3. Physical custody of Veda and Kimberly shall be with Donna M. Coyle, subject to periods of partial custody/visitation with Dennis W. Coyle, Sr. as the parties can agree.

FILED

SEP 20 2000


William A. Shaw
Prothonotary

4. Dennis W. Coyle, Sr., and Donna M. Coyle shall share major holidays in a manner to be agreed upon by the parties.

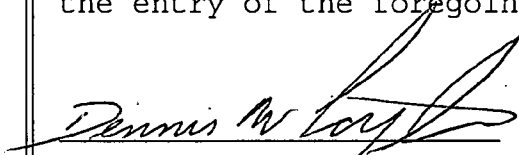
5. Neither party shall speak in a derogatory fashion about the other party in the presence of the children, nor will he or she permit anyone else to do so. Moreover, each parent will exercise his or her best efforts to promote a healthy relationship between the children and the other parent.

6. These terms are to be minimum provisions, and the parties are encouraged to make such adjustments as the best interests of the children may dictate.

BY THE COURT,


Judge

We, the undersigned, do hereby agree and consent to
the entry of the foregoing Order:



DENNIS W. COYLE, SR.

PLAINTIFF



DONNA M. COYLE

DEFENDANT



ATTORNEY FOR PLAINTIFF



ATTORNEY FOR DEFENDANTS

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

DENNIS W. COYLE, SR.,	:	
	:	
VS.	:	NO. 00-694-CD
	:	
DONNA M. COYLE,	:	
	:	
Defendant	:	

CASE NUMBER: 00-694-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: PRAECIPE 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

DEC 06 2000

William A. Shaw
Prothonotary

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

DENNIS W. COYLE, SR., :
Plaintiff : NO. 00-694-CD
VS. :
DONNA M. COYLE, :
Defendant :

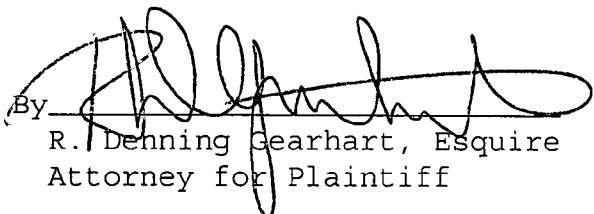
PRAECIPE TO TRANSMIT THE RECORD

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[©] of the Pennsylvania Divorce Code.
2. Defendant received said Complaint by certified mail, restricted delivery, return receipt requested. An Affidavit of Mailing has been filed with the Prothonotary of Clearfield County.
3. Date of execution of the Affidavit of Consent required by Section 3301[©] of the Pennsylvania Divorce Code: by Plaintiff November 13, 2000; by Defendant November 21, 1999.

Respectfully submitted,

By 
R. Denning Gearhart, Esquire
Attorney for Plaintiff

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


DENNIS W. COYLE, SR.	:	
Plaintiff	:	
VS.	:	NO. 00-694-CD
	:	
DONNA M. COYLE,	:	DIVORCE
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: 11/13/00


Plaintiff

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

DENNIS W. COYLE, SR.,	:	
Plaintiff	:	NO. 00-694-CD
VS.	:	
	:	IN DIVORCE
DONNA M. COYLE,	:	
Defendant	:	

AFFIDAVIT OF CONSENT

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed on June 9, 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: 11/13/00

Dennis W. Coyle
Plaintiff

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

DENNIS W. COYLE, SR.

Plaintiff

VS.

DONNA M. COYLE,

Defendant

NO. 00-694-CD

DIVORCE

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: 11-21-00

Donna M. Coyle
Defendant

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

DENNIS W. COYLE, SR.,	:	
Plaintiff	:	NO. 00-694-CD
VS.	:	
	:	IN DIVORCE
DONNA M. COYLE,	:	
Defendant	:	

AFFIDAVIT OF CONSENT

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed on June 9, 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: 11-21-00

Donna M. Coyle
Defendant

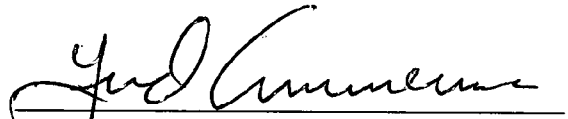
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DENNIS W. COYLE, SR.,	:	
Plaintiff	:	NO. 00-694-CD
VS.	:	
	:	IN DIVORCE
DONNA M. COYLE,	:	
Defendant	:	

DECREE

AND NOW, this 11 day of December, 2000, it is
Ordered and Decreed that DENNIS W. COYLE, SR., Plaintiff, and DONNA
M. COYLE, Defendant, are divorced from the bonds of matrimony.

BY THE COURT,


JUDGE

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION No. 00-694-CD

DENNIS W. COYLE, SR.,
Plaintiff

vs.

DONNA M. COYLE,
Defendant

PRAECIPE TO TRANSMIT THE
RECORD

FILED
DEC 06 2000
William A. Shaw
Prothonotary

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

COMMERCIAL PRINTING CO., CLEARFIELD, PA.

Lap over margin

COUNTY

CLEARFIELD

RECORD OF

DIVORCE OR ANNULMENT



(CHECK ONE)



STATE FILE NUMBER

STATE FILE DATE

HUSBAND

1. NAME	(First)	(Middle)	(Last)	2. DATE	(Month)	(Day)	(Year)
	DENNIS	W.	COYLE, SR.	OF BIRTH	5/8/1961		
3. RESIDENCE	Street or R.D.	City, Boro. or Twp.	County	State	4. PLACE	(State or Foreign Country)	
	R. D. 1, Box 133,	Curwensville, PA	16833	OF BIRTH	New Jersey		
5. NUMBER OF THIS MARRIAGE	1	6. RACE	WHITE	BLACK	OTHER (Specify)	7. USUAL OCCUPATION	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Self-employed	

WIFE

8. MAIDEN NAME	(First)	(Middle)	(Last)	9. DATE	(Month)	(Day)	(Year)
	DONNA	M.	FIJALKOWSKI	OF BIRTH	12/27/1965		
10. RESIDENCE	Street or R.D.	City, Boro. or Twp.	County	State	11. PLACE	(State or Foreign Country)	
	c/o Tina McFarland,	Owens St., Kerr Add.,	Clearfield	OF BIRTH	New Jersey		
12. NUMBER OF THIS MARRIAGE	1	13. RACE	WHITE	BLACK	OTHER (Specify)	14. OCCUPATION	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Unknown	
15. PLACE OF THIS MARRIAGE	(County)	(State or Foreign Country)	16. DATE OF THIS MARRIAGE	(Month)	(Day)	(Year)	
	New Jersey		11/4/89				
17A. NUMBER OF CHILDREN THIS MARRIAGE	2	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18	2	18. PLAINTIFF	HUSBAND	WIFE	OTHER (Specify)
				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20. NUMBER OF CHILDREN TO CUSTODY OF	HUSBAND	WIFE	SPLIT CUSTODY	OTHER (Specify)	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT	Section 3301(c) of the Divorce Code	
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
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 DIVISION

Dennis W. Coyle, Sr.

Vs.

Donna M. Coyle

Case No. 2000-694-CD

NOTICE TO RESUME PRIOR SURNAME

Notice is hereby given that the Defendant in the above matter, after the entry of a Final Decree in Divorce dated 12/11/2000 hereby elects to resume the prior surname of Donna M. Fijalkowski, and gives this written notice avowing his/her intention pursuant to the provisions of 54 P.S. § 704.

Date: Wednesday, September 06, 2017

Donna M Coyle
Donna M. Coyle

TO BE KNOWN AS:

Donna M Fijalkowski
Donna M. Fijalkowski

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

On the 6th day of September 2017, before me, the Prothonotary or a Notary Public, personally appeared the above affiant known to me to be the person whose name is subscribed to the within document and acknowledged that he/she executed the foregoing for the purpose therein contained.

In Witness Whereof, I have hereunto set my hand and official seal.

Brian K. Spencer
BRIAN K. SPENCER
Prothonotary
My Commission Expires
1st Monday in January 2018
Clearfield Co., Clearfield, PA
Prothonotary or Notary Public

FILED
SEP 06 2017
BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURTS
3 CLK. DEP

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

Dennis W. Coyle, Sr.
Plaintiff

Vs.

Case No. 2000-694-CD

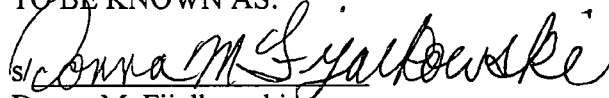
Donna M. Coyle
Defendant

CERTIFICATE OF ELECTION TO RETAKE PRIOR NAME

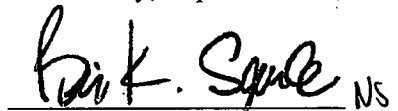
Notice is hereby given that a final Decree in divorce from the bonds of matrimony has been granted in the above captioned matter on 12/11/2000 and that Donna M. Coyle hereby elects to retake and hereafter use her prior name of Donna M. Fijalkowski, and gives this written notice avowing her intention with the provisions of 54 Pa.C.S.A. Section 704.


s/ Donna M. Coyle
Donna M. Coyle

TO BE KNOWN AS:


s/ Donna M. Fijalkowski
Donna M. Fijalkowski

Certified from the record
Wednesday, September 06, 2017


Brian K. Spencer NS
Brian K. Spencer, Prothonotary