

00-947-CD ALL FIVE MEMS 10-13-00 TO 00-1197-0
KAREN E. BLOSE -vs- RICHARD J. BLOSE

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

KAREN E. BLOSE,
Plaintiff

VS.

RICHARD J. BLOSE
Defendant

No. ~~00~~ 00-947-00

IN DIVORCE

CASE NUMBER: 00-
TYPE OF CASE DIVORCE
TYPE OF PLEADING COMPLAINT IN DIVORCE
FILED ON BEHALF OF: PLAINTIFF
COUNSEL OF RECORD FOR THIS PARTY: NONE

CHILDREN:
Breanna Linn Blose
Allison R. Blose
Isaac J. Blose

Karen E. Blose
1095 TL
Dubois, PA 15801
(814) 375-6032

FILED

AUG 09 2000

William A. Shaw
Prothonotary

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

AFFIDAVIT

Before me, the undersigned officer, personally appeared, KAREN E. BLOSE, who being duly sworn according to law deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information, and belief.



KAREN E. BLOSE

Sworn to and subscribed
Before me this 9th day
Of August, 2000.


Notary Public

Notarial Seal
Charles L. Strunk, Notary Public
Sandy Twp., Clearfield County
My Commission Expires Nov. 18, 2002

Member, Pennsylvania Association of Notaries

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

KAREN E. BLOSE
Plaintiff

NO. 00

VS.

IN DIVORCE

RICHARD J. BLOSE
Defendant

COMPLAINT

AND NOW, comes the Plaintiff, KAREN E. BLOSE, who files this complaint and avers as follows:

COUNT 1- DIVORCE/IRRETRIEVABLE BREAKDOWN 3301(c)

1. That the Plaintiff, KAREN E. BLOSE, is an adult individual who presently resides at 1090 Treasure Lake, DuBois, Clearfield County, Pennsylvania 15801.
2. That the Defendant, RICHARD J. BLOSE, is an adult individual who is presently residing at 1531 Treasure Lake, DuBois, Clearfield County, Pennsylvania 15801.
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 the Plaintiff and Defendant were married on July 5, 1991 in Elkton, Maryland.
5. That there were 3 children born of this marriage.

COUNT 11- REQUEST FOR EQUITABLE DISTRIBUTION OF MARITAL PROPERTY UNDER SECTION 3502(D) OF THE DOMESTIC RELATIONS CODE

1. That prior paragraphs of this Complaint are incorporated by reference.
2. That the Plaintiff and defendant have acquired property, both real and personal, during their marriage.
3. That the Plaintiff and defendant have been able to agree to an equitable division of property.
4. That the Plaintiff will assume ownership of the 2000 Ford Expedition, all household goods and furniture (except that which is stated below), and personal property belonging to herself and the minor children.
5. That the Defendant will assume ownership of the house located at Section 1, Lot 116 of Treasure Lake, DuBois, Clearfield County, Pennsylvania. Defendant will maintain and assume all taxes and debt associated with said property. Defendant will pay plaintiff the sum of \$7500.00 within 1 year of the filing of this Complaint, for her share of the equity accumulated in this property. Defendant will also receive the tools, deep freeze, and master bedroom furniture.

WHEREFORE, Plaintiff respectfully requests the Court to enter such Order pursuant to Section 3502(d) of the Divorce Code.

COUNT VI- REQUEST FOR APPROVAL OF ANY SETTLEMENT AGREEMENT AND INCORPORATION THEREOF IN DIVORCE DECREE UNDER SECTIONS 3104(a) AND 3323(b) OF THE DOMESTIC RELATIONS CODE

1. That prior paragraphs of this Complaint are incorporated by reference.
2. That the Plaintiff is and has always been willing to negotiate a fair and reasonable settlement of all matters with the Defendant.
3. That the Plaintiff desires that written agreements with respect to support, custody, and property division, be approved by the Court and incorporated, but not merged, in any final divorce decree dissolving the marriage between the two parties.

WHEREFORE, if written settlement agreements have been reached between the Plaintiff and Defendant prior to the time of the hearing on this Complaint, Plaintiff, KAREN E. BLOSE, respectfully requests that pursuant to Sections 3104 (a) (1) and (3) and 3323(b) of the Divorce Code, the Court approve and incorporate, but not merge, such agreement in the final divorce decree.

COUNT VII-REQUEST FOR CONTINUED MAINTENANCE AND BENEFICIARY DESIGNATIONS OF EXISTING POLICIES INSURING LIFE AND HEALTH OF SPOUSE AND CHILDREN UNDER SECTION 3502(b) OF THE DOMESTIC RELATIONS CODE.

1. The prior paragraphs of this Complaint are incorporated by reference.
2. That during the course of the marriage, Defendant has maintained certain health insurance policies for the benefit of the Plaintiff, Karen E. Blose and their children: Breanna L. Blose, Allison R. Blose, and Isaac J. Blose.
3. That Pursuant to Section 3502(d), Plaintiff, Karen E. Blose, requests that the Defendant, Richard J. Blose be directed to continue maintenance of said policies for the benefit of the plaintiff and the children.

WHEREFORE, Plaintiff respectfully requests that pursuant to Section 3502(d) of the Domestic Relations Code, the Court enter an order directing Defendant to continue to maintain certain health insurance policies for the benefit of the Plaintiff and the children.

COUNT VIII- REQUEST FOR SUPPORT OF SPOUSE AND CHILDREN UNDER SECTIONS 3104(a) AND 3323(b) OF THE DOMESTIC RELATIONS CODE

1. That the prior paragraphs of this Complaint are incorporated by reference.
2. That the Plaintiff and Defendant are parents of the following unemancipated children:

Breanna Linn Blose	8 years old	Female	DOB 11-02-1991 resides with plaintiff
Allison Rae Blose	6 years old	Female	DOB 07-17-1994 resides with Plaintiff
Isaac John Blose	3 years old	Male	DOB 02-24-1997 resides with Plaintiff

4. That support is sought for Breanna L. Blose, Allison R. Blose, and Isaac J. Blose.
5. Plaintiff is not on Public Assisatance.
6. That the Defendant earns in excess of \$50,000 net per year.
7. That Defendant has been paying \$1400.00 per month for the support of the children and Plaintiff desires said payments be continued by Order of the Court until Isaac J. Blose reaches the age of eighteen.
8. That the Defendant will pay the Sum of \$1400.00 on or before the tenth day of each month beginning the tenth day of September, 2000.

WHEREFORE, Plaintiff requests an award of \$1400.00 per month for support of the children of the parties.

Count IX-REQUEST FOR CONFIRMATION OF CUSTODY, PARTIAL CUSTODY, AND/OR VISITATION UNDER SECTIONS 3104(a) AND 3323(b) OF THE DOMESTIC RELATIONS CODE.

1. That the prior paragraphs of this Complaint are incorporated by reference.
2. That the Plaintiff and defendant have agreed to uphold the previous terms and conditions of the existing custody order filed in the Court of Common Pleas Of Clearfield County, Pennsylvania.
3. That the Custody Case No. is 99-1276 CD and judgement was entered on December 8, 1999.

WHEREFORE, Plaintiff requests that the Court acknowledge and accept the existing Custody Order granted by the Clearfield County court.

He S. Ren
8/9/00

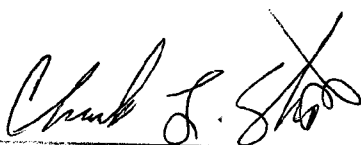
I, Richard J. Blose, agree to pay Karen E. Blose the sum of **ONE THOUSAND FOUR HUNDRED DOLLARS (1400.00)** per month for the support of our children: Breanna L. Blose, Allison R. Blose, and Isaac J. Blose. I will make said payment on or before the tenth day of each month beginning September 10, 2000 and ending when Isaac J. Blose reaches his eighteenth birthday. The \$1400.00 figure is based on my annual income being \$50,000, therefore I agree to notify Karen E. Blose of any change in that income to determine if an increase in child support is in order. However, at no time, for any reason, will my payments be less than One Thousand Four Hundred Dollars per month.

Furthermore, I agree to maintain the Health Insurance coverage for Breanna L. Blose, Allison R. Blose, and Isaac J. Blose until each has reached the age of eighteen. I also agree that I will be held responsible for any and all unreimbursed medical expenses incurred on behalf of the children.

DATE:

8/9/00

RICHARD J. BLOSE



Notarial Seal
Charles L. Strunk, Notary Public
Sandy Twp., Clearfield County
My Commission Expires Nov. 18, 2002

Member, Pennsylvania Association of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

KAREN E. BLOSE
Plaintiff

Vs

No 00-

RICHARD J. BLOSE
Defendant

CASE NUMBER: No. 00-
TYPE OF CASE: Civil/Divorce
TYPE OF PLEADING: Acceptance of service
FILED ON BEHALF OF: Defendant

COUNSEL OF RECORD FOR THIS PARTY: NONE

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

KAREN E. BLOSE,
Plaintiff

Vs.

No. 00-

RICHARD J. BLOSE,
Defendant

ACCEPTANCE OF SERVICE

I, Richard J. Blose, defendant in the above captioned action, hereby acknowledge receipt of a certified copy of the Complaint in Divorce filed in the above captioned matter.

Richard J. Blose
Defendant

Dated: 8/9/00

Richard J. Blose

Sworn and subscribed
before me this 9th day
of Aug A.D. 2000
[Signature]

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

Karen Blose,
Plaintiff

:
:
:
: No 99-1276-CD
:
:

Richard J. Blose,
Defendant

ORDER

AND NOW , this 8th day of December, 1999, this being the day and date set for a custody conference and upon the defendant failure to appear although served, it is ORDERED:

1. Plaintiff, mother, shall have legal and physical custody of the parties' minor children, Breanna Blose(DOB 11-2-91), Allison Blose (DOB 7-17-94) and Isaac Blose (DOB 2-24-97).
2. Defendant, father, shall have partial physical custody as the parties may mutually agree.

/s/ Fredric J. Ammerman

Fredric J. Ammerman, Judge

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

DEC 08 1999

Attest:


Prothonotary

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

RICHARD J. BLOSE

:

-vs-

:

No. 00-1197-CD

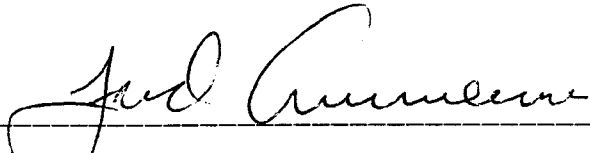
KAREN E. BLOSE

:

O R D E R

NOW, this 9th day of October, 2000, the Court noting that the above-captioned action of Richard J. Blose, Plaintiff, versus Karen E. Blose, Defendant, No. 00-1197-CD is duplicative of the custody action previously filed by Karen E. Blose to No. 99-1276-CD and the divorce action filed by Karen E. Blose to No. 00-947-CD, the Court believing that the actions should be consolidated for purposes of judicial economy; the Court believing that since the above-captioned action contains the issues of custody and divorce that all further filings in the consolidated action shall be to the caption and number as set forth above.

BY THE COURT,



Judge

FILED

OCT 13 2000

William A. Shaw
Prothonotary