

00-1163-CD  
Felice W. Dugan vs Daniel J. Dugan

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00-1163-CD  
Felice W. Dugan vs. Daniel J. Dugan

**MARK S. WEAVER**  
ATTORNEY AT LAW  
211½ EAST LOCUST STREET  
P.O. BOX 170  
CLEARFIELD, PA 16830

COMMERCIAL PRINTING CO., CLEARFIELD, PA



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

FELICE W. DUGAN,  
Plaintiff  
vs.  
DANIEL J. DUGAN,  
Defendant

: No. 00-1163 -CD  
: Type of Case: CIVIL  
: Type of Pleading:  
: COMPLAINT IN DIVORCE  
: Filed on Behalf of:  
: PLAINTIFF  
: Counsel of Record for  
: PLAINTIFF  
: Mark S. Weaver, Esq.  
: PA Supreme Court No. 63044  
: P.O. Box 170  
: 211 1/2 East Locust Street  
: Clearfield, PA 16830  
: (814) 768-9696  
:  
:  
: NO CHILDREN BORN OF  
: THIS MARRIAGE

**FILED**

SEP 18 2000  
012:40 AM  
William A. Shaw PO  
Prothonotary 90..

3 cent to MTS

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

FELICE W. DUGAN, :  
Plaintiff :  
: :  
vs. : No. 00- -CD  
: :  
DANIEL J. DUGAN, :  
Defendant :  
:

**NOTICE TO DEFEND**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other 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 and Market Streets  
Clearfield, PA 16830  
(814) 765-2641

**AMERICANS WITH DISABILITIES  
ACT OF 1990**

The Court of 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.

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Clearfield County Court Administrator  
Clearfield County Courthouse  
Corner of Market and Second Streets  
Clearfield, PA 16830

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

FELICE W. DUGAN,	:	
Plaintiff	:	
vs.	:	
	00-	-CD
DANIEL J. DUGAN,	:	
Defendant	:	
	:	

**COMPLAINT**

NOW COMES, the Plaintiff, FELICE W. DUGAN, by her attorney, Mark S. Weaver, Esquire and files this complaint and respectfully represents:

**COUNT I - DIVORCE - SECTION 3301(c)**

1. Plaintiff is Felice W. Dugan, who currently resides at Sunnyside, R.R. 3, Box 7C, Apartment 2, Clearfield, Clearfield County, Pennsylvania.
2. Defendant is Daniel J. Dugan, who currently resides at R.R. 2, Box 88A, Clearfield, Clearfield County, Pennsylvania.
3. Plaintiff and Defendant have been bona fide residents in the Commonwealth for at least six months immediately previous to the filing of this Complaint.
4. The Plaintiff and Defendant were married on September 20, 1997 in Clearfield, Clearfield County, Pennsylvania.
5. There have been no prior actions of divorce or for annulment between the parties.
6. The marriage is irretrievably broken.
7. Plaintiff has been advised that counseling is available and that Plaintiff may have the right to request that the court require the parties to participate in counseling.

8. Plaintiff requests the Court to enter a decree of divorce.

WHEREFORE, Plaintiff prays this Honorable Court to enter a final decree divorcing her from Defendant and such other relief as the Court deems necessary and appropriate.

Respectfully submitted,

Date: 9-18-00

  
\_\_\_\_\_  
Mark S. Weaver  
Attorney for Plaintiff

**VERIFICATION**

I, the undersigned, hereby verify that the statements set forth in the foregoing Complaint are true to the best of my information, knowledge and belief. This statement is made subject to the penalties of 18 Pa C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 9/18/00

Felice W. Dugan  
Felice W. Dugan

**MARK S. WEAVER**  
ATTORNEY AT LAW  
21 1/2 EAST LOCUST STREET  
P.O. BOX 170  
CLEARFIELD, PA 16830

PRINTED: CLEARFIELD, PA

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

FELICE W. DUGAN, :  
Plaintiff :  
vs. :  
DANIEL J. DUGAN, :  
Defendant :  
: No. 00-1163-CD  
: Type of Case: CIVIL  
: Type of Pleading:  
: ACCEPTANCE OF SERVICE  
: Filed on Behalf of:  
: PLAINTIFF  
: Counsel of Record for Plaintiff:  
: Mark S. Weaver, Esq.  
: PA Supreme Court No. 63044  
: P.O. Box 170  
: 211 1/2 East Locust Street  
: Clearfield, PA 16830  
: (814) 768-9696

FILED

SEP 27 2000  
0/22/00  
William A. Shaw  
Prothonotary

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

FELICE W. DUGAN, :  
Plaintiff :  
vs. :  
No. 00-1163-CD  
DANIEL J. DUGAN, :  
Defendant :  
:

**ACCEPTANCE OF SERVICE**

I, DANIEL J. DUGAN, Defendant in the above-captioned matter, hereby accept service of  
a certified copy of the Divorce Complaint filed on September 18, 2000 in the above matter.

Date: 9/24/00

Daniel J. Dugan  
Daniel J. Dugan

ED

Mr. 207000  
333116-C City  
William A. Shaw  
Prothonotary  
Krantz

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JAMES A. NADDEO  
ATTORNEY AT LAW  
211 1/2 EAST LOCUST STREET  
P.O. BOX 552  
CLEARFIELD, PENNSYLVANIA 16830

(3)

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

FELICE W. DUGAN,  
Plaintiff

v.

DANIEL J. DUGAN,  
Defendant

\*  
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\*  
\* No. 00 - 1163 - CD  
\* IN DIVORCE  
\*  
\*  
\*  
\* Type of Pleading:  
\*  
\* Praeclipe for Appearance  
\*  
\*  
\* Filed on behalf of:  
\* Defendant  
\*  
\* Counsel of Record for  
\* this party:  
\*  
\*  
\* James A. Naddeo, Esq.  
\* Pa I.D. 06820  
\*  
\* 211 1/2 E. Locust Street  
\* P.O. Box 552  
\* Clearfield, PA 16830  
\* (814) 765-1601

**FILED**

OCT 20 2000

William A. Shaw  
Prothonotary

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

FELICE W. DUGAN,  
Plaintiff

v.

DANIEL J. DUGAN,  
Defendant

\*  
\*  
\*  
\*  
\*  
\*

No. 00 - 1163 - CD  
IN DIVORCE

PRAECIPE FOR APPEARANCE

TO THE PROTHONOTARY:

Please enter my appearance on behalf of the Defendant,  
Daniel J. Dugan, in the above-captioned case.

  
\_\_\_\_\_  
James A. Naddeo  
Attorney for Defendant

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

FELICE W. DUGAN,  
Plaintiff

v.

DANIEL J. DUGAN,  
Defendant

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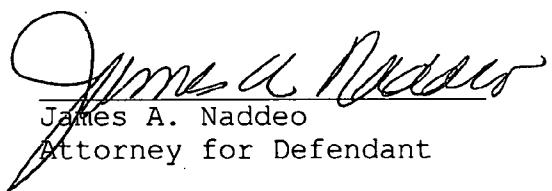
No. 00 - 1163 - CD  
IN DIVORCE

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Defendant's Praeclipe to Enter Appearance in the above-captioned action was served on the following person and in the following manner on the 20th day of October, 2000:

First-Class Mail, Postage Prepaid

Mark S. Weaver, Esquire  
211 1/2 E. Locust Street  
P. O. Box 170  
Clearfield, PA 16830

  
James A. Naddeo  
Attorney for Defendant

FILED  
JAN 09 2001  
NO. 11540-44

William A. Shaw  
Prothonotary

MARK S. WEAVER  
ATTORNEY AT LAW  
211½ EAST LOCUST STREET  
P.O. BOX 170  
CLEARFIELD, PA 16830

COMMERCIAL PRINTING CO., CLEARFIELD, PA

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

FELICE W. DUGAN, :  
Plaintiff :  
: :  
v. : No. 00-1163-CD  
: :  
DANIEL J. DUGAN, :  
Defendant :  
:

**PRAECIPE TO TRANSMIT**

TO: William A. Shaw, Prothonotary

I submit with this Praecipe to Transmit:

1. Proposed Divorce Decree;
2. Completed Vital Statistics Form;
3. Original Affidavit of Consent executed by the Plaintiff and Defendant; and
4. Original Waiver of Notice of Intention to Request Entry of a Divorce Decree Under §3301(c) of the Divorce Code executed by the Plaintiff and Defendant; and

Date: 1-8-01

  
\_\_\_\_\_  
Mark S. Weaver  
Attorney for Plaintiff

**FILED**

JAN 09 2001

William A. Shaw  
Prothonotary

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

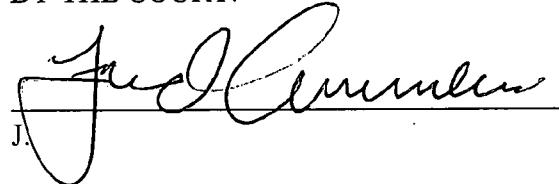
FELICE W. DUGAN, :  
Plaintiff :  
: :  
vs. : No. 00-1163-CD  
: :  
DANIEL J. DUGAN, :  
Defendant :  
:

**DIVORCE DECREE**

AND NOW this 10<sup>th</sup> day of January, 2001, a Complaint in divorce having been filed by the Plaintiff to the above captioned matter on September 18, 2000, under Section 3301(c) of the Divorce Code, and both parties having filed an Affidavit of Consent as required by the Divorce Code more than ninety (90) days after service of the Complaint in this action, the Court hereby enters the following decree:

We, therefore, DECREE that **FELICE W. DUGAN** be divorced and forever separated from the nuptial ties and bonds of matrimony hereto contracted between herself and **DANIEL J. DUGAN**, thereupon all of the rights, duties or claims accruing to either of 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.

BY THE COURT:

  
J. Cawley

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HEALTH  
VITAL STATISTICS

RECORD OF				STATE FILE NUMBER			
COUNTY		DIVORCE	OR	ANNULMENT	STATE FILE DATE		
Clearfield		<input checked="" type="checkbox"/>	(CHECK ONE)	<input type="checkbox"/>			
HUSBAND							
1. NAME (First) J. (Middle) (Last) Dugan				2. DATE OF BIRTH (Month) (Day) (Year) 05/06/65			
3. RESIDENCE Street or R.D. City, Boro. or Twp. County State		4. PLACE OF BIRTH (State or Foreign Country) Pennsylvania					
R.R. 2, Box 88A, Clearfield, Clearfield Co., PA							
5. NUMBER OF THIS MARRIAGE 1		6. RACE WHITE <input checked="" type="checkbox"/> NEGRO <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		7. USUAL OCCUPATION construction/mechanic			
WIFE							
8. MAIDEN NAME (First) Felice (Middle) (Last) Dugan				9. DATE OF BIRTH (Month) (Day) (Year) 09/04/64			
10. RESIDENCE Street or R.D. City, Boro. or Twp. County State		11. PLACE OF BIRTH (State or Foreign Country) Pennsylvania					
R.R. 3, Box 7C, Clearfield, Clearfield Co., PA							
12. NUMBER OF THIS MARRIAGE 1		13. RACE WHITE <input checked="" type="checkbox"/> NEGRO <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		14. USUAL OCCUPATION clerk typist II			
15. PLACE OF THIS MARRIAGE Clearfield County, PA				16. DATE OF THIS MARRIAGE (Month) (Day) (Year) 09/20/97			
17A. NUMBER OF CHILDREN THIS MARRIAGE 0		17B. NUMBER OF DEPENDENT CHILDREN UNDER 18		18. PLAINTIFF HUSBAND WIFE <input checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		19. DECREE GRANTED TO HUSBAND 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"/> 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 STATISTICS (Month) (Day) (Year)			
24. SIGNATURE OF TRANSCRIBING CLERK							

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

FELICE W. DUGAN, :  
Plaintiff :  
: :  
vs. : No. 00-1163-CD  
: :  
DANIEL J. DUGAN, :  
Defendant :  
:

**AFFIDAVIT OF CONSENT**

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed  
September 18, 2000

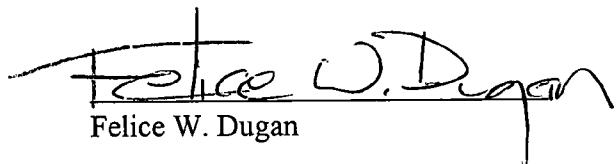
2. The marriage of Plaintiff and Defendant is irretrievably broken and ninety (90) days  
have elapsed from the date of service of the Complaint.

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, lawyer's  
fees or expenses if I do not claim them before a divorce is granted.

I verify that the statements made in this Affidavit are true and correct. I understand that false  
statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn  
falsification to authorities.

Date: 1/8/01

  
Felice W. Dugan

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

FELICE W. DUGAN, :  
Plaintiff :  
vs. : No. 00-1163-CD  
DANIEL J. DUGAN, :  
Defendant :  
:

**AFFIDAVIT OF CONSENT**

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed September 18, 2000
2. The marriage of Plaintiff and Defendant is irretrievably broken and ninety (90) days have elapsed from the date of service 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, lawyer's fees or expenses if I do not claim them before a divorce is granted.

I verify that the statements made in this Affidavit are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: 12/29/00

Daniel J. Dugan  
Daniel J. Dugan

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

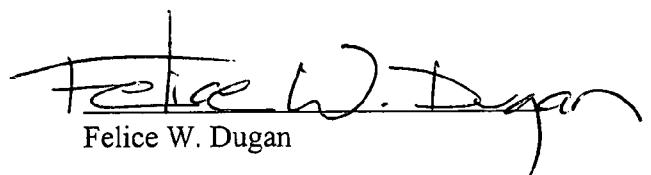
FELICE W. DUGAN, :  
Plaintiff :  
: :  
vs. : No. 00-1163-CD  
: :  
DANIEL J. DUGAN, :  
Defendant :  
:

**WAIVER OF NOTICE OF INTENTION TO REQUEST  
ENTRY OF A DIVORCE DECREE UNDER  
§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 Waiver 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 falsifications to authorities.

Date: 1/8/01

  
Felice W. Dugan

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

FELICE W. DUGAN, :  
Plaintiff :  
: :  
vs. : No. 00-1163-CD  
: :  
DANIEL J. DUGAN, :  
Defendant :  
:

**WAIVER OF NOTICE OF INTENTION TO REQUEST  
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§3301(c) OF THE DIVORCE CODE**

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Date: 12/29/00

Daniel J. Dugan  
Daniel J. Dugan

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

Felice W. Dugan  
PLAINTIFF

vs.

NO. 06-1163-CD

Daniel J. Dugan  
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 10<sup>th</sup> day of January, 2001, and that the Plaintiff/Defendant Felice Walker Dugan hereby elects to retake and hereafter use her prior name of Felice Eloise Walker, and gives this written notice avowing her intention in accordance with the Act of April 2, 1980, P.L. 63, as amended.

(33)  
/s/ Felice W. Dugan

TO BE KNOWN AS

(33)  
/s/ Felice Eloise Walker

Sworn and subscribed before me this  
16<sup>th</sup> day of February,  
A.D. 2001.

FILED

FEB 16 2001

Notary

William A. Shaw  
Prothonotary

**COPY**

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

**Felice W. Dugan**  
Plaintiff

Case No. 00-1163-CD

**Daniel J. Dugan**  
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 10th day of January, 2001, and that the Plaintiff Felice W. Dugan hereby elects to retake and hereafter use her prior name of Felice Eloise Walker, and gives this written notice avowing her intention in accordance with the provisions of 54 Pa.C.S.A. Section 704.

*/s/* \_\_\_\_\_  
Felice W. Dugan

TO BE KNOWN AS:

*/s/* \_\_\_\_\_  
Felice Eloise Walker

Certified from the record this  
16th day of February, 2001

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

FILED  
01/23/01  
FEB 16 2001  
10:00 AM  
William A. Shaw  
Prothonotary