

UJ-1248-CD
BRUCE E. GEORGE -vs- JENNIFER L. GEORGE

Date: 11/03/2000

Clearfield County Court of Common Pleas

NO. 0050638

Time: 09:38 AM

Receipt

Page 1 of 1

Received of: Gearhart, R. Denning (attorney for George, Bruce _____ \$ 0.00

Zero and 00/100 Dollars

Case: 2000-01248-CD	Plaintiff: George, Bruce E.	Amount
Divorce Complaint Additional Counts		0.00
Divorce No Custody		0.00
Paid Prior to FullCourt		
Total:		0.00

Payment Method: Cash

William A. Shaw, Prothonotary/Clerk of Courts

Clerk: OLDCASE

By: _____
Deputy Clerk

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

BRUCE E. GEORGE, :
Plaintiff : NO. 00- 1248 -CD
VS. :
: IN DIVORCE
JENNIFER L. GEORGE, :
Defendant :
:

CASE NUMBER: 00- 1248 -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: Benjamin J. George (d.o.b. 9/9/99)

FILED

OCT 06 2000

William A. Shaw
Prothonotary

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

BRUCE E. GEORGE, :
Plaintiff : NO. 00- -CD
VS. :
: IN DIVORCE
JENNIFER L. GEORGE, :
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)

BRUCE E. GEORGE :
Plaintiff : NO. 00- -CD
VS. :
: IN DIVORCE
JENNIFER L. GEORGE, :
Defendant :
:

COMPLAINT

AND NOW, comes the Plaintiff, BRUCE E. GEORGE, 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, BRUCE E. GEORGE, is an adult individual who is presently residing at R.R. #1, Box 412-C, Morrisdale, Clearfield County, Pennsylvania 16858.
2. That the Defendant, JENNIFER L. GEORGE, is an adult individual who is presently residing at 3310 Rustic Lane, Erie, Pennsylvania, 16506.
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 July 4, 1997, in Erie, Pennsylvania.
5. That there was one child born of this marriage, namely, Benjamin J. George (d.o.b. 9/9/99).

6. There is no known active divorce that has been filed 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 - EQUITABLE DISTRIBUTION

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

10. That Plaintiff and Defendant have legally and beneficially acquired both real and personal property during the course of their marriage.

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

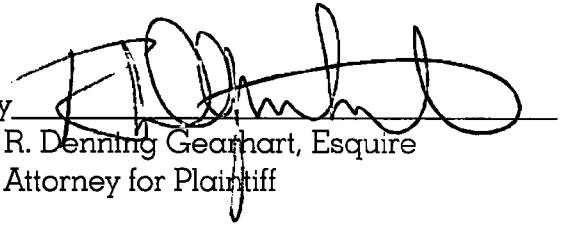
12. A full and complete inventory and appraisement of all property owned or possessed by Plaintiff will be filed as a matter of record in accordance with the Divorce Code and Rules of Court applicable thereto.

WHEREFORE, Plaintiff requests your Honorable Court to equitably divide all marital property, with costs taxed to the Defendant.

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 BRUCE E. GEORGE, 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.

Bruce E. George
BRUCE E. GEORGE

Sworn to and subscribed

before me, this 5

day of October, 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 IN DIVORCE
No. 00-
-CD

BRUCE E. GEORGE,
Plaintiff

vs.

JENNIFER L. GEORGE,
Defendant

COMPLAINT IN DIVORCE

Sept 06 2000
116-381-A
William A. Simek
Prothonotary

95.00

acc atty

W. Simek

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

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

BRUCE E. GEORGE,
Plaintiff

vs.

No. 00-1248-CD

JENNIFER L. GEORGE,
Defendant

PRAECIPE TO ENTER
APPEARANCE

Filed on behalf of

Defendant

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

OCT 12 2000

William A. Show
Clearfield County

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

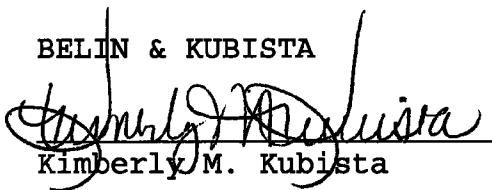
BRUCE E. GEORGE, :
Plaintiff :
:
vs. : No. 00-1248-CD
:
JENNIFER L. GEORGE, :
Defendant :
:

PRAECIPE TO ENTER APPEARANCE

TO THE PROTHONOTARY:

Please enter my appearance on behalf of the Defendant in
reference to the above captioned action.

BELIN & KUBISTA


Kimberly M. Kubista

Date: 10-11-00

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

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

BRUCE E. GEORGE,
Plaintiff

vs. : No. 00-1248-CD

JENNIFER L. GEORGE,
Defendant

MOTION FOR SPECIAL RELIEF

Filed on behalf of

Defendant

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

OCT 12 2000

WILLIAM A. COOPER
Clerk of Court

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

BRUCE E. GEORGE,
Plaintiff

vs. : No. 00-1248-CD

JENNIFER L. GEORGE,
Defendant

ORDER

NOW THIS 17th day of October, 2000, upon Movant's Motion for Special Relief, it is hereby ORDERED and DECREED that said Motion is granted and Movant is permitted to attend a program in Erie, Pennsylvania similar to that of the Children's First Program. It is further ORDERED that Movant shall provide to this Court a certificate of completion evidencing her attendance at the same.

BY THE COURT



Judge

FILED

OCT 18 2000

William A. Shaw
Prothonotary

FILED

OCT 18 2000
101811CC-CH
William A. Shaw
Prothonotary
Kubotz
[Signature]

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

BRUCE E. GEORGE,
Plaintiff

vs. : No. 00-1248-CD

JENNIFER L. GEORGE,
Defendant

MOTION FOR SPECIAL RELIEF

NOW COMES the Movant, Jennifer L. George, by and through her attorneys, Belin & Kubista and sets forth the following Motion for Special Relief, and in support thereof would aver as follows:

1. That Movant is Jennifer L. George, Defendant in the above set forth matter.
2. That Respondent is Bruce E. George, Plaintiff in the above set forth matter.
3. That Respondent filed a Complaint in Divorce on October 6, 2000 in the Court of Common Pleas of Clearfield County, to Civil Division No. 00-1248-CD.
4. That pursuant to Your Honorable Court's directives, all parties who are involved in divorce actions who have minor children must attend the Children's First Program.
5. That Movant resides in Erie, Pennsylvania which is approximately three (3) hours away from Clearfield, Pennsylvania.
6. That given the distance Movant would have to travel to attend the Children's First Program, she would request that she be permitted to attend a like program in Erie, Pennsylvania.

WHEREFORE, Movant requests Your Honorable Court to permit her to attend a program in Erie, Pennsylvania like that of the Children's First Program offered in Clearfield County, Pennsylvania

BELIN & KUBISTA



Kimberly M. Kubista,
Attorney for Movant

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

OCT 12 2000
8/3231 1C
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City
Kubot

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

BRUCE E. GEORGE, :
Plaintiff :
VS. : NO. 00-1248-CD
JENNIFER L. GEORGE, :
Defendant :
FEB 1 2001
[Signature]

CASE NUMBER: 00-1248-CD
FILED
TYPE OF CASE: Civil OCT 16 2000
TYPE OF PLEADING: AFFIDAVIT OF MAILING William A. Shway
FILED ON BEHALF OF: Plaintiff
PROCLAMATION
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

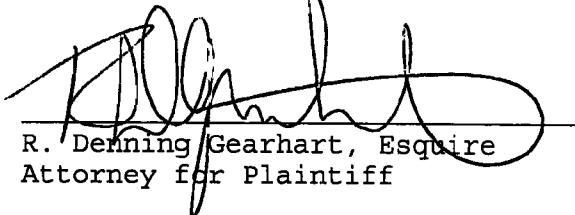
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

BRUCE E. GEORGE, :
Plaintiff :
VS. : NO. 00-1248-CD
: :
JENNIFER L. GEORGE, :
Defendant : :

AFFIDAVIT OF MAILING

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

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 13 day
of October, 2000.

Kathleen A. Ricotta
Notary Public

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

SENDER: COMPLETE THIS SECTION

- 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.

1. Article Addressed to:

Jennifer L. George
3310 Rustic Lane
Erie, PA 16506

2. Article Number (Copy from service label)

7000 0600 0023 1117 6132

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Jennifer George

B. Date of Delivery

10-11-99

C. Signature

X Jennifer George

Agent
 Addressee

D. Is delivery address different from item 1?

Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
No. 00-1248-CD

BRUCE E. GEORGE,
Plaintiff

vs.

JENNIFER L. GEORGE,
Defendant

AFFIDAVIT OF MAILING

16 2000
O 11.5/10cc
[Handwritten signature]

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

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

BRUCE E. GEORGE, :
Plaintiff :
vs. :
: No. 00-1248-CD
JENNIFER L. GEORGE, :
Defendant :
:

**PETITION TO WITHDRAW AS
COUNSEL**

Filed on behalf of

Petitioner

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830

FILED

AUG 13 2003

William A. Shaw
Prothonotary

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

BRUCE E. GEORGE,
Plaintiff

vs.

JENNIFER L. GEORGE,
Defendant

:
:
:
:
:
:
:
:

No. 00-1248-CD

RULE

NOW, this _____ day of _____, 2003, upon
consideration of the attached Petition, a Rule is hereby issued upon Defendant, to show Cause why
the Petition should not be granted. Rule returnable thereon the _____ day of
_____, 2003, 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 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 case may proceed without you and an order may 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
Market & Second Streets
Clearfield, PA 16830
(814) 765-2641, ext. 1300

BY THE COURT:

Judge

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

BRUCE E. GEORGE, :
Plaintiff :
: :
vs. : : No. 00-1248-CD
: :
JENNIFER L. GEORGE, :
Defendant : :

PETITION TO WITHDRAW AS COUNSEL

NOW COMES, the Petitioner, KIMBERLY M. KUBISTA, ESQUIRE in her representation of the Defendant in the above-captioned matter, and respectfully petitions the Court as follows:

1. That Petitioner is employed by Defendant to represent her in a divorce action in the above set forth case.
2. That there has been a breakdown in communication between Petitioner and Defendant and Petitioner no longer feels she can represent the Defendant in this matter.

WHEREFORE, Petitioner requests Your Honorable Court to direct that Petitioner be able to withdraw as counsel for Defendant.

BELIN & KUBISTA

Kimberly M. Kubista

(814) 765-8972

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

BRUCE E. GEORGE, :
Plaintiff :
: :
vs. : : No. 00-1248-CD
: :
JENNIFER L. GEORGE, :
Defendant : :
: :

CERTIFICATE OF SERVICE

This is to certify that the undersigned has served a true and correct copy of Petition to
Withdraw as Counsel in the above-captioned matter to the following parties by first-class, postage
prepaid mail, on the 13th day of August, 2003:

Jennifer L. George
806 Treasure Lake
DuBois, PA 15801

R. Denning Gearhart, Esquire
215 E. Locust Street
Clearfield, PA 16830

BELIN & KUBISTA

Kimberly M. Kubista

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

(A)

FILED

KA
TO
3:08 am, 3 sec to a day
AUG 13 2003

William A. Shaw
Prothonotary

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

BRUCE E. GEORGE,
Plaintiff

vs.

No. 00-1248-CD

JENNIFER L. GEORGE,
Defendant

STIPULATION

Filed on behalf of

Defendant

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

AUG 19 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE E. GEORGE, :
Plaintiff :
: :
vs. : : No. 00-1248-CD
: :
JENNIFER L. GEORGE, :
Defendant : :

STIPULATION

NOW THIS 18 day of Aug, 2003, upon Stipulation of Jennifer L. George and her counsel, Kimberly M. Kubista, it is hereby agreed that Kimberly M. Kubista, is permitted to withdraw as counsel for Jennifer L. George.

Kimberly M. Kubista
Kimberly M. Kubista

Jennifer L. George
Jennifer L. George

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

FILED
OCT 24 2003
AG 19 2003
cc Atty Kubista
William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE E. GEORGE,
Plaintiff

vs.

No. 00-1248-CD

JENNIFER L. GEORGE,
Defendant

PRAECIPE TO WITHDRAW
APPEARANCE

Filed on behalf of

Defendant

Counsel of Record for
this Party:

Kimberly M. Kubista
Attorney-At-Law
Pa. I.D. 52782

BELIN & KUBISTA
15 N. Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

AUG 20 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

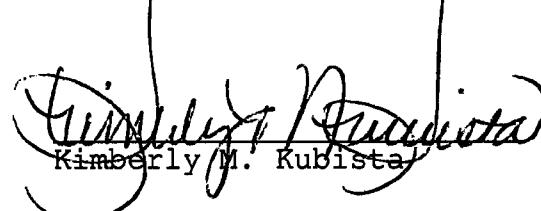
BRUCE E. GEORGE, :
Plaintiff :
:
vs. : No. 00-1248-CD
:
JENNIFER L. GEORGE, :
Defendant :
:

PRAECIPE TO WITHDRAW APPEARANCE

TO THE PROTHONOTARY:

Please withdraw my appearance on behalf of the Defendant
in the above-captioned matter pursuant to Stipulation dated August
18, 2003.

BELIN & KUBISTA


Kimberly M. Kubista

Date: 8-19-03

BELIN & KUBISTA
ATTORNEYS AT LAW
15 NORTH FRONT STREET
P. O. BOX 1
CLEARFIELD, PENNSYLVANIA 16830

FILED 200
Clerk of the Court
AUG 20 2003
William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE E. GEORGE, :
Plaintiff :
Vs. : No. 00-1248-CD
JENNIFER L. GEORGE, : IN DIVORCE
Defendant :
:

CASE NUMBER: No. 00-1248-CD
TYPE OF CASE: Civil
TYPE OF PLEADING: PRAECIPE TO WITHDRAW DIVORCE
FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQ.
Supreme Court I. D. #26540
207 E. Market Street
Clearfield, PA 16830
(814) 765-1581

FILED
0 3:40 PM 6K
FEB 14 2006 3CL ATR
GK
William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE E. GEORGE, :
Plaintiff :
Vs. : No. 00-1248-CD
JENNIFER L. GEORGE, : IN DIVORCE
Defendant :
:

PRAECIPE TO WITHDRAW DIVORCE

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please withdraw my Complaint in Divorce filed in the above captioned
matter.

Bruce E. George

Bruce E. George, Plaintiff

Sworn to and subscribed before

me this 13 day of February,
2006.

Kathleen A. Ricotta

Notary Public

Commonwealth of Pennsylvania

NOTARIAL SEAL

KATHLEEN A. RICOTTA, Notary Public
Clearfield Boro., County of Clearfield
My Commission Expires June 15, 2009

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION IN DIVORCE
No. 00-1248-CG

BRUCE E. GEORGE,
Plaintiff

vs.

JENNIFER L. GEORGE,
Defendant

PRAECLPTE TO WITHDRAW DIVORCE

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