

00-1315-CJ
GENEVIEVE HOFFMAN -vs- ROBERT P. HOFFMAN

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

GENEVIEVE HOFFMAN,

Plaintiff *

- vs -

* No. 00-1315-C

ROBERT P. HOFFMAN,

Defendant *

Type of Action:
Divorce

Type of Pleading:
Complaint

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

THERE ARE NO MINOR CHILDREN
BORN OF THIS MARRIAGE.

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

OCT 24 2000

William A. Shaw
Prothonotary

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
- vs - * No.
*
ROBERT P. HOFFMAN, *
Defendant *

NOTICE TO DEFEND

You have been sued in Court for:

[XX] Divorce	[] Annulment of Marriage
[] Support (Child)	[] Custody
[] Division of Property	[] Visitation
[] Temporary Alimony	[] Alimony
[] Costs	[] Attorney Fees

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 for any other claim or relief requested in these papers by the Plaintiff. You may lose money or property or other rights important to you.

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 at the Office of the Prothonotary, Clearfield County Courthouse, Clearfield, Pennsylvania.

IF YOU DO NOT FILE A CLAIM FOR ALIMONY, DIVISION OF PROPERTY, COUNSEL 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.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW

211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

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

GENEVIEVE HOFFMAN,		*
	Plaintiff	*
		*
- vs -		* No.
		*
ROBERT P. HOFFMAN,		*
	Defendant	*

COMPLAINT

AND NOW, comes the Plaintiff, Genevieve Hoffman, by
through her attorney, Richard H. Milgrub, Esquire, and files the
following Complaint in Divorce:

1. Plaintiff is Genevieve Hoffman, an adult
individual, who currently resides at 610 Williams Street,
Clearfield, Clearfield County, Pennsylvania.
2. Defendant is Robert P. Hoffman, an adult
individual, who currently resides at 605 West Front Street,
Clearfield, Clearfield County, Pennsylvania.
3. Plaintiff and Defendant have been bona fide
residents of the Commonwealth of Pennsylvania for at least six
months (6) immediately previous to the filing of this Complaint.
4. Plaintiff and Defendant were married on August 27,
1983 at the Ramey Methodist Church, Ramey, Pennsylvania.
5. There have been no prior actions for divorce or
annulment between the parties.
6. Plaintiff avers that she is entitled to a divorce
on the ground that the marriage is irretrievably broken.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
111 NORTH BRADY STREET
DUBOIS, PA 15801

Furthermore, Plaintiff, the innocent and injured spouse, avers that Defendant, in violation of his marriage vows and the laws of the Commonwealth of Pennsylvania has committed such indignities to the person of the Plaintiff so as to make her condition intolerable and life burdensome. Finally, at the appropriate time, Plaintiff may submit an Affidavit alleging that the parties have lived separate and apart for at least two (2) years.

7. That the Plaintiff has been advised of the availability of counseling and furthermore, the Plaintiff has been advised of the right to request that the Court require the parties to participate in counseling.

8. This action is not collusive.

WHEREFORE, Plaintiff requests your Honorable Court to enter a Decree in Divorce, divorcing Plaintiff and Defendant.

Count II - Equitable Distribution

9. Paragraphs 1 through 4 of this Complaint are incorporated herein by reference as though set forth in full.

10. Plaintiff and Defendant have legally and beneficially acquired property, both real and personal, during their marriage from August 27, 1983 until the date of the filing of this Complaint, the date of their separation, all of which property is "marital property".

11. Plaintiff and Defendant have acquired, prior to their marriage or subsequent thereto, "non-marital property" which has increased in value since the date of the marriage

and/or subsequent to its acquisition during the marriage, which increase in value is "marital property".

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

WHEREFORE, Plaintiff requests the Court to equitably divide all marital property and to enjoin it from being removed, disposed of, alienated, sold or otherwise encumbered pending final hearing and settlement of all claims.

Count III - Alimony

13. Paragraphs 1 through 4 of this Complaint are incorporated herein by reference as though set forth in full.

14. Plaintiff lacks sufficient property to provide for her reasonable means and is unable to support herself through appropriate employment.

15. Plaintiff requires reasonable support to adequately maintain herself in accordance with the standard of living established during the marriage.

16. Defendant earns in excess of Twenty-four thousand dollars (\$24,000.00) per year and has substantial assets, the amount of which is unknown to Plaintiff.

17. Defendant has not paid any alimony or support to the Plaintiff.

WHEREFORE, Plaintiff requests the Court to enter an

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

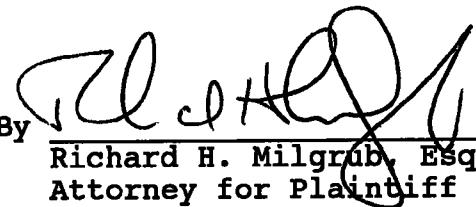
award of reasonable temporary alimony until final hearing and permanently thereafter.

Count IV - Attorney's Fees

18. Paragraphs 1 through 17 of this Complaint are incorporated herein by reference as though set forth in full.

19. Plaintiff has employed Richard H. Milgrub, Esquire, as counsel, but is unable to pay the necessary and reasonable attorneys' fees for said counsel.

WHEREFORE, Plaintiff requests your Honorable Court to enter a an award of temporary counsel fees, costs and expenses and to order such additional sums thereafter as may be deemed necessary and appropriate, and at final hearing, to further award such additional counsel fees, costs and expenses as are deemed necessary and appropriate.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

I, Genevieve Hoffman, verify that the statements made in the Complaint 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: 10/2/00

Genevieve Hoffman

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED
10/3/2000
OCT 24 2000
Atty pd
William A. Shraw
RICHARD H. MILGRUB 105.00
Attnomey & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

GENEVIEVE HOFFMAN,
Plaintiff

*

*

*

-vs-

* No. 00-1315-CD

*

*

*

ROBERT P. HOFFMAN,
Defendant

Type of Pleading:
Affidavit of Service

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

OCT 30 2000

Wm. A. Shaw
Prothonotary

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

GENEVIEVE HOFFMAN,
Plaintiff

*

*

*

-vs-

* No. 00-1315-CD

*

*

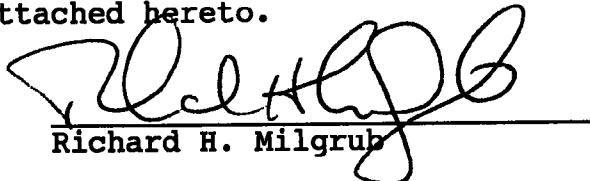
ROBERT P. HOFFMAN,
Defendant

*

*

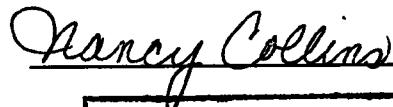
AFFIDAVIT OF SERVICE

Richard H. Milgrub, attorney for the above-named Plaintiff, being duly sworn according to law, deposes and states that Plaintiff's Complaint in Divorce was served upon the Defendant, Robert P. Hoffman, by certified mail, return receipt requested on October 26, 2000, at the Defendant's residence of 605 West Front Street, Clearfield, Pennsylvania 16830, as appears from receipt of certified mail attached hereto.



Richard H. Milgrub

SWORN and SUBSCRIBED to before me this 30th day of October, 2000.



Nancy Collins

Notarial Seal
Nancy Collins, Notary Public
Pike Twp., Clearfield County
My Commission Expires Mar. 24, 2003

Member, Pennsylvania Association of Notaries

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

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:

Robert P. Hoffman
605 West Front Street
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)	B. Date of Delivery <i>10/24/00</i>
C. Signature <i>Robert P. Hoffman</i>	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If YES, enter delivery address below:	
E. Article Addressed to:	
F. Service Type	
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
G. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes	

2. Article Number (Copy from Service Label)
70993400000275931924

PS Form 3811, July 1999

102595-99-M-1789

Domestic Return Receipt

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Richard H. Milgrub
211 N. 2nd Street
Clearfield, PA 16830

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
111 NORTH BRADY STREET
DUBOIS, PA 15801

OCT 3 2007
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RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

GENEVIEVE HOFFMAN, :
VS. Plaintiff :
ROBERT P. HOFFMAN, : NO. 00-1315-CD
Defendant :
:

CASE NUMBER: 00-1315-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: PETITION FOR MARRIAGE COUNSELLING

FILED ON BEHALF OF: Defendant

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

NOV 03 2000

WILLIAM GEARHART
CLEARFIELD COUNTY

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

GENEVIEVE HOFFMAN, :
Plaintiff :
: vs. : No. 00-1315-CD
: :
ROBERT P. HOFFMAN, :
Defendant :
:

RULE RETURNABLE

AND NOW, this 9 Day of November, 2000, upon consideration of the attached Petition, a Rule is hereby issued upon GENEVIEVE HOFFMAN, to show cause why the foregoing Petition, should not be granted. Rule Returnable the 29th Day of November, 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 MOTION 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's Office
Clearfield County Courthouse
Second & Market Streets
Clearfield, PA 16830
(814) 765-2641

FILED

NOV 13 2000

William A. Shaw
Prothonotary

BY THE COURT

JUDGE

FILED

NOV 13 2000
Q/334/34c - Gtly
William A. Shar
Prothonotary
U.S. District Court

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

GENEVIEVE HOFFMAN, :
Plaintiff :
vs. : No. 00-1315-CD
ROBERT P. HOFFMAN, :
Defendant :
:

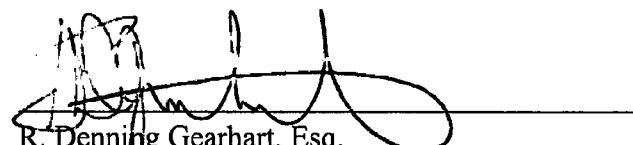
PETITION FOR MARRIAGE COUNSELLING

AND NOW, comes the Petitioner, ROBERT P. HOFFMAN, by and through his attorney, R. Denning Gearhart, Esquire, and in support thereof, sets forth the following:

1. That the Petitioner is ROBERT P. HOFFMAN, currently residing at 605 W. Front Street, Clearfield, PA 16830.
2. That the Respondent is GENEVIEVE HOFFMAN, currently residing at 610 Williams Street, Clearfield, PA 16830.
3. That the Respondent has filed a Complaint in Divorce on October 24, 2000, pursuant to Section 3301(c).
4. That the Petitioner believes that time is a strong likelihood of reconciliation.

WHEREFORE, pursuant to 23 Pa. C.S.A. Section 3302, the Petitioner respectfully requests that this Honorable Court Order counselling by a qualified professional and that a report be made by a qualified professional stating that the parties did or did not attend.

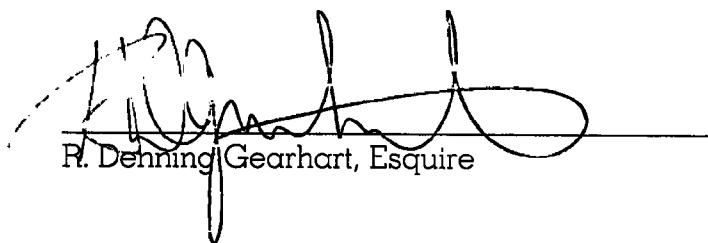
Respectfully submitted,



R. Denning Gearhart, Esq.
Attorney for Petitioner

AFFIDAVIT

R. DENNING GEARHART, being duly sworn according to law, deposes and says that he is the agent of the Defendant, ROBERT P. HOFFMAN, that said ROBERT P. HOFFMAN cannot make the verification to the foregoing Petition because he was not present on the day and date this Petition was filed, and further, that the Defendant would not be available until after the day of the filing of this Petition, and that the facts set forth in the foregoing Petition are based on information provided to Counsel by the Defendant and based partially upon personal knowledge of the Defendant's attorney. However, the Defendant verified this information to his counsel fully aware of the penalties of false statements under 18 Pa. C.S.A., section 4904, relating to unsworn falsification to authorities.



R. Denning Gearhart, Esquire

Sworn to and subscribed
before me this 2 day
of November, 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 No. 00-1315-CD

GENEVIEVE HOFFMAN, Plaintiff

vs.

ROBERT P. HOFFMAN, Defendant

PETITION FOR MARRIAGE COUNSELLING

Nov 03 1997
0110063cc atty
R. Denning Gearhart
c

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

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

GENEVIEVE HOFFMAN, :
Plaintiff :
: :
vs. : No. 00-1315-CD
: :
ROBERT P. HOFFMAN, :
Defendant :
:

CASE NUMBER: No. 00-1315-CD
TYPE OF CASE: Civil
TYPE OF PLEADING: CERTIFICATE OF SERVICE
FILED ON BEHALF OF: Defendant

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

REC'D
NOV 15 2000

William A. Shaw
Prothonotary

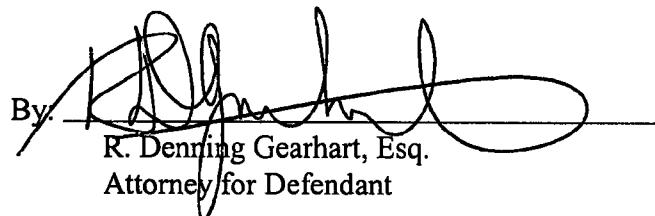
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GENEVIEVE HOFFMAN, :
Plaintiff :
: :
vs. : No. 00-1315-CD
: :
ROBERT P. HOFFMAN, :
Defendant :
:

CERTIFICATE OF SERVICE

This is to certify that the undersigned has on this date served a certified copy of the Petition for Marriage Counselling filed in the above captioned matter on the Plaintiff through Plaintiff's attorney by depositing such documents in the United States Mail postage pre-paid and addressed as follows:

Richard H. Milgrub, Esq.
211 North Second Street
Clearfield, PA 16830

By: 
R. Denning Gearhart, Esq.
Attorney for Defendant

Dated: November 15, 2000

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION No. 00-1315-CD

GENEVIEVE HOFFMAN,
Plaintiff

vs.

ROBERT P. HOFFMAN,
Defendant

CERTIFICATE OF SERVICE

NOV 15 2000
ROBERT P. HOFFMAN
PCT

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

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

Type of Action:
Divorce

Type of Pleading:
Petition to List
Property for Sale

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FEB 22 2001

William A. Shaw
Prothonotary

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

PETITION TO LIST PROPERTY FOR SALE

AND NOW, comes Your Petitioner, Genevieve Hoffman, by and through her attorney, Richard H. Milgrub, Esquire, who files the following Petition:

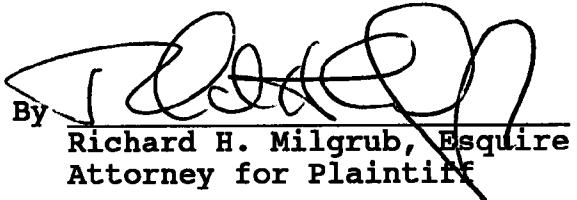
1. Your Petitioner and the Respondent are presently owners of real estate located at 605 West Front Street, Clearfield, Pennsylvania.
2. Your Petitioner and the Respondent have attempted to negotiate a settlement of the marital issues, but have failed to do so.
3. The major marital asset consists of the above-mentioned real estate.
4. Your Petitioner wishes that the property be listed for sale immediately.
5. Your Petitioner feels that the Respondent has shown some reluctance and is using a possible pending foreclosure action as reasons for making an inadequate offer of a property settlement.

WHEREFORE, Your Petitioner respectfully requests that a

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

Rule be issued upon the Respondent to show cause why said property should not be listed for sale immediately.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW

211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

VERIFICATION

I, Richard H. Milgrub, have read the foregoing

Petition

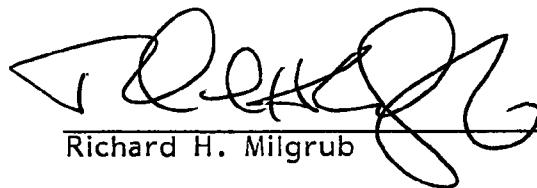
The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

I am authorized to make this verification on behalf of

Plaintiff

because of my position as counsel of record.



Richard H. Milgrub

Dated: 2/21/01

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
111 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

CC
FEB 2 1980
C 13230-31
ATTY
William A. Shaw
Frakonocny

RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

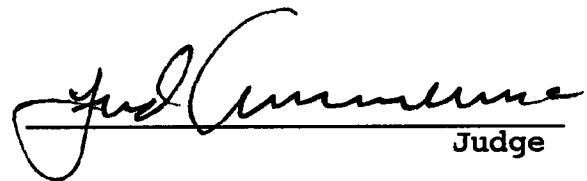
GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

RULE

AND NOW, this 26 day of February, 2001, upon
consideration of the Plaintiff's Petition to List Property for
Sale, it is hereby ORDERED and DIRECTED that a Rule be issued
upon the Respondent to show cause why said property should not be
listed for sale immediately.

Rule returnable by filing a written response the 19th
day of March, 2001.

BY THE COURT:



Judge

FILED

FEB 27 2001

William A. Shaw
Prothonotary

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

FER 27 2001
C/C 42 KC aty 11/96/01
William A. Shaw
Prothonotary
EEZ

RICHARD H. MILCRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

GENEVIEVE HOFFMAN,
Plaintiff

*

*

-vs-

*

*

ROBERT P. HOFFMAN,
Defendant

*

*

No. 00-1315-CD

Type of Action:

Divorce

Type of Pleading:

Affidavit of Service

Filed on Behalf of:

Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

FEB 28 2001
0/3:20/01
William A. Shaw
Prothonotary
No C/C
E/S
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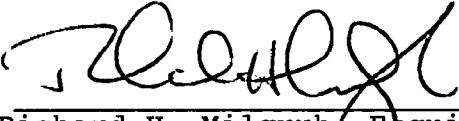
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

AFFIDAVIT OF SERVICE

I, Richard H. Milgrub, Esquire, personally served R. Denning Gearhart, Esquire, attorney for the above-captioned Defendant this 28th day of February, 2001 with Plaintiff's Petition to List Property for Sale along with a Rule requiring a written response March 19, 2001.

Date: 2/28/01

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

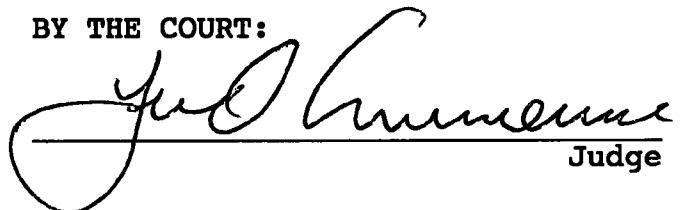
GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

RULE

AND NOW, this 3 day of April, 2001, upon
consideration of the Plaintiff's Petition for Equitable Relief,
it is hereby ORDERED and DIRECTED that a Rule be issued upon the
Defendant to show cause why Plaintiff's prayer for relief should
not be granted.

Rule returnable with hearing thereon the 26th day of
April, 2001 at 10 : 00 A.m. in Courtroom 1
of the Clearfield County Courthouse, Clearfield, Pennsylvania.

BY THE COURT:



Judge

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

APR 03 2001

William A. Shaw
Prothonotary

FILED

APR 03 2001
35211-
William A. Shaw
Prothonotary

Milcrub
Mulgrew

RICHARD H. MILCRUB

Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

Type of Action:
Divorce

Type of Pleading:
Petition for Equitable
Relief

Filed on Behalf of:
Plaintiff

FILED

MAR 30 2001

William A. Shaw
Prothonotary

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

PETITION FOR EQUITABLE RELIEF

AND NOW, comes Your Petitioner, Genevieve Hoffman, by and through her attorney, Richard H. Milgrub, Esquire, who files the following Petition:

1. Your Petitioner is the Plaintiff in a pending divorce action against the Respondent, her husband.
2. The parties own a marital residence located at 605 West Front Street, Clearfield, Pennsylvania.
3. The marital residence is presently occupied by the Respondent.
4. The Respondent has not made any mortgage payments and home equity loan payments and the parties have received notice of a mortgage foreclosure.
5. The Respondent is employed and is able to make said payments.
6. Your Petitioner is reluctant to make the payments since she is not in the house and sees no reason why she has to support the Respondent.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

7. Various proposals have gone back and forth between the parties as to an overall marriage settlement proposal, but no agreement has yet been reached.

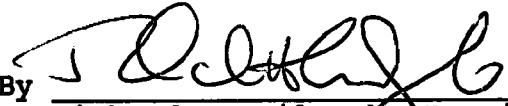
8. Your Petitioner feels that since the Respondent is the one who has occupied the marital residence, it has been his responsibility to keep the mortgage payments and home equity loan payments up to date.

9. Respondent's attorney has been out of the area and it has been difficult to resolve the issue.

10. Your Petitioner has received notice that a foreclosure action will be started immediately with additional costs involved.

WHEREFORE, Your Petitioner respectfully requests of the following:

- a. that the Respondent be directed to bring all mortgage payments current;
- b. to turn possession of the marital residence over to Your Petitioner; or
- c. have the property listed for sale immediately.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

VERIFICATION

I, Richard H. Milgrub, have read the foregoing

Petition

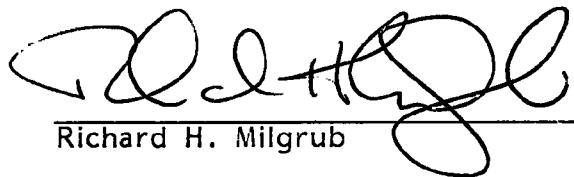
The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

I am authorized to make this verification on behalf of

Plaintiff

because of my position as counsel of record.



Richard H. Milgrub

Dated: 3/30/01

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

MAR 30 2001
O 3:14/KCath Milgrub
Shaw
MAY 1 2001
RICHARD H. MILGRUB
Attorney & Counselor at Law

RICHARD H. MILGRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

GENEVIEVE HOFFMAN,
Plaintiff

*
*
*
*
*

-vs-

No. 00-1315-CD

ROBERT P. HOFFMAN,
Defendant

*
*
*
*

Type of Action:

Divorce

Type of Pleading:

Certificate of Service

Filed on Behalf of:

Plaintiff

FILED

APR 05 2001

William A. Shaw
Prothonotary

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

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

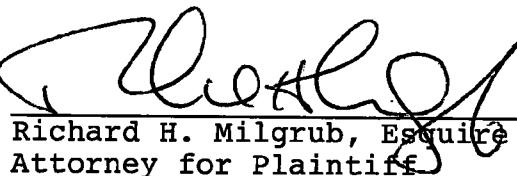
GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

CERTIFICATE OF SERVICE

I, Richard H. Milgrub, Esquire, do hereby certify that Plaintiff's Petition for Equitable Relief and Rule scheduling hearing for April 26, 2001 at 10:00 a.m. was personally served this 5th day of April, 2001 upon Defendant's attorney of record, R. Denning Gearhart, Esquire, 215 East Locust Street, Clearfield, Pennsylvania.

Date: 4/5/01

By


Richard H. Milgrub, Esquire
Attorney for Plaintiff

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

APR 05 2001
03/20/01
William A. Shaw
Prothonotary

RICHARD H. MILGRUB
Attorney & Counseler at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

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

GENEVIEVE HOFFMAN

:

-vs-

: No. 00-1315-CD

ROBERT P. HOFFMAN

:

O R D E R

NOW, this 26th day of April, 2001, this being the date set for argument on the Petition for Equitable Relief filed on behalf of the Plaintiff; both parties being present and being represented by counsel and upon their agreement, it is the ORDER of this Court as follows:

1. Husband shall vacate the former marital residence located at 605 West Front Street in Clearfield by no later than May 15th, 2001. As of the said date, by no later than 5:00 p.m., wife shall retake possession of the same and be entitled to exclusive possession thereof.

2. Wife has agreed to be responsible for any past due payments, charges, interest or otherwise as well as future payments of the PNC mortgage covering the home as well as the PNC Bank equity loan relative the home.

3. By no later than May 15th, 2001, husband shall

FILED have provided an appropriate special warranty deed to wife

MAY 01 2001 deeding the property to her in such form as counsel for both
William A. Shaw parties shall approve.
Prothonotary

4. Husband shall be responsible for all future and any past due payments relative the CNB Bank installment loan for his pickup truck.

5. Wife has agreed to be responsible for all payments associated with the Sears and Montgomery Ward credit cards and the CNB Bank Mastercard.

BY THE COURT,



Judge

FILED
3:23
MAY 01 2001

William A. Shaw
Prothonotary

4 CC
2 - Milgrub
2 - Gearhart

EGT

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

GENEVIEVE HOFFMAN,
Plaintiff

- vs -

ROBERT P. HOFFMAN,
Defendant

*

*

*

* No. 00-1315-CD

*

*

*

Type of Action:
Divorce

Type of Pleading:
Praecipe to Transmit
the Record

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

111 N. B. S.

J. 2001

William A. Shaw
Prothonotary

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

GENEVIEVE HOFFMAN,
Plaintiff

- vs -

ROBERT P. HOFFMAN,
Defendant

*
*
*
*
* No. 00-1315-CD
*
*

PRAECIPE TO TRANSMIT RECORD

TO THE PROTHONOTARY:

Dear Sir:

Please transmit the record, together with the following information to the Court for entry of a Divorce Decree:

1. Ground for divorce: irretrievable breakdown of the marriage under Section 3301(c) of the Divorce Code.

2. Date and manner of service of the Complaint:

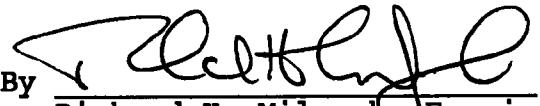
Served on the Defendant by certified mail, restricted delivery, return receipt requested on October 26, 2000.

3. Date of execution of the Affidavit of Consent required by Section 3301(c) of the Divorce Code: By Plaintiff on May 31, 2001 and by Defendant on May 24, 2001.

4. Date of execution of the Waiver of Notice required by Section 3301(c) of the Divorce Code: By Plaintiff on May 31, 2001 and by Defendant on May 24, 2001.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

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

GENEVIEVE HOFFMAN,
Plaintiff

*

*

*

-vs-

*

No. 00-1315-CD

ROBERT P. HOFFMAN,
Defendant

*

*

*

AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under Section 3301(c) of the
Divorce Code was filed on October 24, 2000.

2. The marriage of Plaintiff and Defendant is irretrievably
broken. Ninety days have elapsed since the filing of the
Complaint.

3. I consent to the entry of a Final Decree of Divorce.

4. I understand that if a claim for alimony pendente lite,
marital property or counsel fees or expenses has not been filed
with the Court before the entry of a Final Decree in Divorce, the
right to claim any of them will be lost.

The party whose signature appears below verifies that the
statements made in this Affidavit are true and correct, and that
they are made subject to the penalties of 18 Pa.C.S. 4909 relating
to unsworn falsification to authorities.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

Date: 5/31/01

Genevieve Hoffman

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
-vs- * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under Section 3301(c) of the Divorce Code was filed on October 24, 2000.
2. The marriage of Plaintiff and Defendant is irretrievably broken. Ninety days have elapsed since the filing of the Complaint.
3. I consent to the entry of a Final Decree of Divorce.
4. I understand that if a claim for alimony pendente lite, marital property or counsel fees or expenses has not been filed with the Court before the entry of a Final Decree in Divorce, the right to claim any of them will be lost.

The party whose signature appears below verifies that the statements made in this Affidavit are true and correct, and that they are made subject to the penalties of 18 Pa.C.S. 4909 relating to unsworn falsification to authorities.

Date: 5/24/01

Robert P. Hoffman
Robert P. Hoffman

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
111 NORTH BRADY STREET
DUBOIS, PA 15801

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

GENEVIEVE HOFFMAN,	*
Plaintiff	*
	*
-vs-	*
	No. 00-1315-CD
ROBERT P. HOFFMAN,	*
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 in 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.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW

211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

Date: 5/31/01



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

GENEVIEVE HOFFMAN,
Plaintiff

*

*

*

-vs-

*

No. 00-1315-CD

*

*

ROBERT P. HOFFMAN,
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 in 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.

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW

211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

Date: 5/24/01

Robert P. Hoffman
Robert P. Hoffman

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

GENEVIEVE HOFFMAN, *
Plaintiff *
*
- vs - * No. 00-1315-CD
*
ROBERT P. HOFFMAN, *
Defendant *

O R D E R

AND NOW, this 8th day of June, 2001,
Plaintiff having filed a Complaint in Divorce under the Divorce
Act on the 24th day of October, 2000, and the parties having
filed Affidavits of Consent stating that the marriage of the
Plaintiff and Defendant is irretrievably broken and ninety days
(90) have elapsed from the date of the filing of the Complaint.

We, therefore, DECREE that GENEVIEVE HOFFMAN be
divorced and forever separated from the nuptial ties and bonds of
matrimony hereto contracted between herself and ROBERT P. HOFFMAN
thereupon all of the rights, duties or claims accruing to either
of said parties and 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:



Judge

RICHARD H. MILGRUB
ATTORNEY & COUNSELOR
AT LAW
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

111 NORTH BRADY STREET
DUBOIS, PA 15801

2 cc Decrees to Atty Milgrub

2 cc ^{Decrees to} Atty Gearhart

3:07 11/20/07
No. 5
R. H. Milcrub

Whitney & Associates

RICHARD H. MILCRUB
Attorney & Counselor at Law

211 NORTH SECOND STREET
CLEARFIELD, PENNSYLVANIA 16830

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
VITAL RECORDSCOUNTY
Clearfield

RECORD OF		
DIVORCE	OR	ANNULMENT
<input checked="" type="checkbox"/>	(CHECK ONE)	<input type="checkbox"/>

STATE FILE NUMBER	
STATE FILE DATE	

HUSBAND

1. NAME Robert	(First) Paul	(Middle)	(Last) Hoffman	2. DATE OF BIRTH 6 29 37
2. RESIDENCE 100 Swoope Street, Apt. 215, Curwensville, PA	Street or R.D.	City, Boro. or Twp.	County	State
5. NUMBER OF THIS MARRIAGE 1	6. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	7. USUAL OCCUPATION laborer

WIFE

8. MAIDEN NAME Gardner	(First) Genevieve	(Middle)	(Last) Jane	9. DATE OF BIRTH 1 29 34	
10. RESIDENCE 605 West Front Street, Clearfield, Clearfield Co, PA	Street or R.D.	City, Boro, or Twp.	County	State	
12. NUMBER OF THIS MARRIAGE 3	13. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	14. OCCUPATION retired	
15. PLACE OF OF THIS MARRIAGE Clearfield	(County)	(State or Foreign Country) PA		16. DATE OF THIS MARRIAGE 8 27 83	
17A. NUMBER OF CHIL- DREN THIS MARRIAGE 0	17B. NUMBER OF DEPENDENT CHIL- DREN UNDER 18 n/a	18. PLAINTIFF HUSBAND <input type="checkbox"/>	WIFE <input checked="" type="checkbox"/>	19. DECREE GRANTED TO HUSBAND <input type="checkbox"/>	
20. NUMBER OF CHILDREN TO CUSTODY OF <input type="checkbox"/>	HUSBAND <input type="checkbox"/>	WIFE <input type="checkbox"/>	SPLIT CUSTODY <input type="checkbox"/>	OTHER (Specify) n/a	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT 3301 (c)
22. DATE OF DECREE (Month)	(Day)	(Year)	23. DATE REPORT SENT TO VITAL RECORDS (Month) (Day) (Year)		

24. SIGNATURE OF
TRANSCRIBING CLERK