

DOCKET NO. 174

NUMBER	TERM	YEAR
9	September	1961

Doris L. Kuhn

VERSUS

Wilbert D. Kuhn

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DORIS L. KUHN,
Plaintiff

:

: No. 9 SEPTEMBER TERM, 1961

-vs-

: IN DIVORCE

WILBERT D. KUHN,
Defendant.

:

(CONSTABLE'S RETURN)

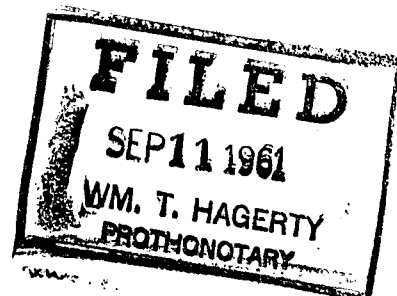
Now, September 6th, 1961, at 10:30 A.M., E.D.S.T., served
WILBERT D. KUHN, at his place of business, to wit, 1 East Dixon
Avenue, DuBois, Pennsylvania, with a true and attested copy of the
within Complaint in Divorce to No. 9 September Term, 1961, by
handing the same to and leaving with him, personally, and making
known to him the contents thereof.

So answers,

Oley Campbell
Constable

Sworn to and subscribed before me this 8th day of September,
1961.

Josephine M. Cherry
JOSEPHINE M. CHERRY,
Notary Public, My Comm.
Commission expires Jan. 7, 1963



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

DORIS L. KUHN,)
Plaintiff,)
vs.)
WILBERT D. KUHN,)
Defendant)

No. 9 Sept. Term, 1961

IN DIVORCE

COMPLAINT

The plaintiff, Doris L. Kuhn, brings this action in divorce against the defendant, Wilbert D. Kuhn, and avers:

1. That neither of said parties to this action is a minor or incompetent.
2. That the residence of the plaintiff is at 417 West Garfield Avenue, DuBois, Pennsylvania.
3. That the defendant is a natural born citizen of the United States, and his present residence and address is at 1 East Dixon Avenue, DuBois, Pa.
4. That the plaintiff has been a bona fide resident of the Commonwealth of Pennsylvania for the past 36 years.
5. That the plaintiff and the defendant were lawfully joined in marriage on the 30th day of September, 1944, in Baltimore, Maryland.
6. That one child was born to this marriage, Michelle Kuhn, aged 14, who resides with the plaintiff.
7. That in violation of his marriage vow and the laws of this Commonwealth, the defendant has offered such indignities to the person of the plaintiff, the injured and innocent spouse, as to render her condition intolerable and life burdensome.
8. That this action is not collusive between the parties.
9. That no other action for divorce or annulment of marriage is now pending between the parties hereto.

WHEREFORE, the plaintiff prays that a decree of absolute divorce be entered divorcing her from the bonds of matrimony heretofore existing between her and the defendant.

Doris L. Kuhn

Plaintiff

Gleason, Cherry and Cherry
Clemens Simon, Attorneys for Plaintiff

By: Clemens Simon

STATE OF PENNSYLVANIA)
) ss:
COUNTY OF CLEARFIELD)

Before me, the undersigned official, personally appeared Doris L. Kuhn, the plaintiff, who, being duly sworn, deposes and says that the statements contained in the foregoing complaint are based upon her own knowledge and are true and correct; that the complaint is not made out of levity or collusion between her and the defendant for the mere purpose of being freed from each other, but in sincerity and truth for the causes mentioned in said complaint.

Doris L. Kuhn

Plaintiff

Sworn and subscribed to before me
this 30th day of August, 1961.

Meritt J. Edner
Notary Public
My com exp 1/16/63

No. *4* *Leak* Term, 1961

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA

IN DIVORCE

DORIS L. KUHN,
Plaintiff,

vs.

WILBERT D. KUHN,
Defendant

COMPLAINT

To the above Defendant:
You are hereby notified to
plead to the enclosed Complaint
within twenty (20) days from the
service hereof.

[Signature]
Attorney for Plaintiff

Gleason, Cherry and Cherry, Attys.
DuBois, Pennsylvania

CLEMENS SIMON

