

DOCKET NO. 174

NUMBER	TERM	YEAR
10	September	1961

Roberta A. Wank

VERSUS

John L. Wank

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ROBERTA A. WANK,
Plaintiff

:

: No. 10 SEPTEMBER TERM, 1961

-vs-

: IN DIVORCE

JOHN L. WANK,
Defendant.

:

(CONSTABLE'S RETURN)

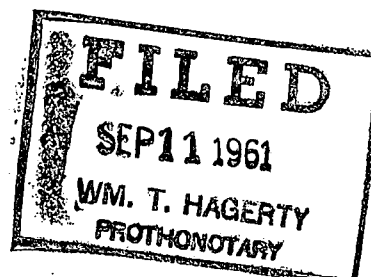
Now, September 6th, 1961, at 11:30 A.M., E.D.S.T., served
JOHN L. WANK, at 5 Denton Avenue, DuBois, Pennsylvania, with a
~~true~~ and attested copy of the within Complaint in Divorce to No.
10 September Term, 1961, by handing the same to and leaving with
him, personally, and making known to him the contents thereof.

So answers,

Ally Campbell
Constable

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

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



IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, Penna.
No. 10 ~~MAY TERM~~, 1961
WANK IN DIVORCE

ROBERTA A. WANK

-VS-

JOHN L. WANK

COMPLAINT

TO WITHIN NAMED DEFENDANT:
You are hereby notified
to plead to the enclosed
COMPLAINT within twenty (20)
days from the service hereof.

GLEASON, CHERRY & CHERRY
Attorneys for Plaintiff

By

Edward V. Wank
FILED
SEP 25 1961

WM. T. MANTORTICES
GLEASON, CHERRY & CHERRY
DU BOIS, PENNSYLVANIA

Du Bois, PENNSYLVANIA
109 N. BRADY STREET

650

Ally

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ROBERTA A. WANK :

No. 10 *Sept.* ~~MAY~~ TERM, 1961

-vs- :

IN DIVORCE

JOHN L. WANK :

COMPLAINT

And now, comes ROBERTA A. WANK, the above entitled Plaintiff, by her Attorneys Gleason, Cherry & Cherry, and brings this Complaint in Divorce of which the following is a statement:

1. That the Plaintiff, ROBERTA A. WANK, is an individual residing at 5 Denton Avenue, DuBois, Pennsylvania.
2. That the Defendant, JOHN L. WANK, is an individual residing at U.S. Navy Base, Port Lyauty, French Morroco, Africa.
3. That neither the said Plaintiff and Defendant are natural born citizens of the United States.
4. That neither the said Plaintiff nor the said Defendant is a minor or is incompetent.
5. That said Plaintiff has resided in Pennsylvania continuously for the past one and one-half years, and does, at the present time, reside in the Commonwealth of Pennsylvania.
6. That the said Plaintiff and the said Defendant were married in the City of DuBois, Clearfield County, Pennsylvania on June 11, 1955.
7. That there were two children born as a result of said marriage, to wit, Christopher Wank, age 4 and Jackie Rae Wank, age 2; and one child was adopted by said Plaintiff and Defendant, to wit: Dennis Robert Wank, age 7, all of whom reside with the said Plaintiff at 5 Denton Avenue, DuBois, Pennsylvania.
8. That the said Defendant, contrary to his marriage

vows and the laws of the Commonwealth of Pennsylvania, has offered such indignities to the person of the Plaintiff as to render her condition intolerable and life burdensome.

9. That said action is not collusive.

10. That there has been no prior action for divorce or annulment of the marriage between the parties hereto in this or any other jurisdiction.

WHEREFORE, Plaintiff prays that a divorce a vinculo matrimonii be entered in her favor and against the said Defendant.

GLEASON, CHERRY & CHERRY
Attorneys for Plaintiff

BY

Edward V Cherry

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

Personally appeared before me, a Notary Public, in and for the County and State aforesaid, ROBERTA A. WANK, who, being duly sworn according to law, deposes and says that the facts set forth in the foregoing Complaint are true and correct and that the same is not made out of levity or by collusion between herself and the said Defendant for the mere purpose of being freed and separated from each other, but in sincerity and truth for the mere purpose of being freed and separated from each other, but in sincerity and truth for the causes mentioned in the Complaint.

Roberta A. Wank

Sworn to and subscribed before me this 1st day of
September, 1961.

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