

03-324-CD  
LAURA L. ALLEN - vs - FAWNAZ F. HINDAWI

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

LAURA L. ALLEN,  
Plaintiff

vs.

FAWWAZ F. HINDAWI,  
Defendant

NO. 2003-324-cv

Type of Case: Divorce

Type of Pleading: Complaint

Filed on behalf of: Plaintiff

Counsel of Record for this Party:  
David P. King, Esquire  
23 Beaver Drive  
P. O. Box 1016  
DuBois, PA 15801  
(814) 371-3760

Supreme Court No. 22980

**FILED**

MAR 07 2003

06121501w

William A. Shaw  
Prothonotary

2 CHAT TO HMT7

No Children

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

LAURA L. ALLEN,	:
Plaintiff	:
	:
vs.	: NO.
	:
FAWWAZ F. HINDAWI,	: IN DIVORCE
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 requested in these papers by the plaintiff. You may lose money or property 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, One North 2nd Street, Clearfield, PA 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.

IF YOU DO NOT HAVE A LAWYER, CONTACT  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
One North 2nd Street  
Clearfield, PA 16830  
(814) 765-2641 Ext. 5982

IF YOU CANNOT AFFORD A LAWYER, CONTACT  
Keystone Legal Services  
P. O. Box 950  
Clearfield, PA 16830  
1-800-326-9177

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

LAURA L. ALLEN,  
Plaintiff

vs.

FAWWAZ F. HINDAWI,  
Defendant

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: NO. \_\_\_\_\_ C.D.  
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COMPLAINT

AND NOW, comes the Plaintiff, LAURA L. ALLEN, through her Attorney, David P. King, and for her cause of action respectfully represents as follows:

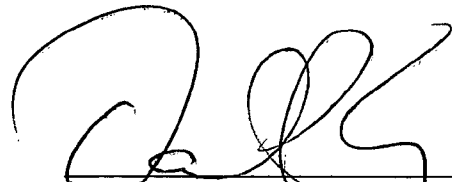
1. The Plaintiff is LAURA L. ALLEN, and she resides at 220 South Brady Street, Apt. C, DuBois, PA 15801.
2. The Defendant, FAWWAZ F. HINDAWI, resides at 5204 Wythe Avenue, Apt. #3, Richmond, VA 23226.
3. The Plaintiff and the Defendant were married on January 21, 1997, in North Shuna, Jordan.
4. The Plaintiff has been a resident of the Commonwealth of Pennsylvania and Clearfield County for a period of at least six months prior to the filing of this divorce action.
5. There have been no prior actions for divorce or annulment between these parties in this or any other jurisdiction.
6. The Plaintiff has been advised of the availability of marriage counseling in accordance with the provisions of The Divorce Code.
7. The Plaintiff is a natural born citizen of the United States, and the Defendant is a citizen of the Country or Kingdom of Jordan, but

resides in the United States as recited above.

8. The Plaintiff avers that this marriage is irretrievably broken within the meaning of Section 3301 (c) or (d) of The Divorce Code.

9. In the alternative, the Plaintiff avers that she is the innocent and injured spouse, and that the Defendant has engaged in a course of conduct over a period of time to make her life burdensome and intolerable amounting to indignities under The Divorce Code.

WHEREFORE, Plaintiff prays your Honorable Court to enter an appropriate Order divorcing her from the bonds of matrimony, and she will so ever pray.



---

David P. King  
Attorney for Plaintiff

I verify that the statements made in this 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: February 25, 2003

Laura L. Allen  
Laura L. Allen  
Plaintiff

FILED

CLERK OF COURT

PAID JAN 20 2004  
40 100 100

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

FILED

LAURA L. ALLEN,  
Plaintiff

vs.

FAWWAZ F. HINDAWI,  
Defendant

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NO. 2003-324-C.D.

AUG 27 2003  
William A. Shaw  
Prothonotary/Clerk of Courts

PRAECIPE TO TRANSMIT RECORD

TO THE PROTHONOTARY:

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

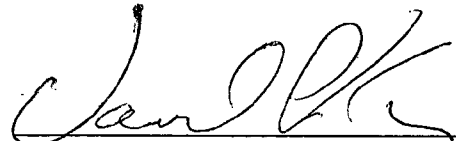
1. Ground for divorce: irretrievable breakdown under Section 3301(c)  
of The Divorce Code.

2. Date and manner of service of the Complaint: On March 11, 2003, a  
certified copy of the Divorce Complaint was sent by certified mail, return  
receipt requested, deliver to addressee only by David P. King, Counsel for  
Plaintiff. Such correspondence was returned and marked "UNCLAIMED". The  
original is attached to this Praecipe along with Sender's Receipt.  
Thereafter, on April 7, 2003, a second certified copy of said Divorce  
Complaint was sent to the Defendant by regular mail, and the same was not  
returned within 15 days, and has in fact never been returned. Thus, under the  
Rules of Civil Procedure, service has been accomplished. A copy of the  
April 7, 2003, letter also attached hereto.

3. Date of execution of Plaintiff's Consent and Waiver of Notice:  
August 26, 2003. (Included herewith).

4. Date of execution of Defendant's Consent and Waiver of Notice:  
August 16, 2003. (Included herewith).

5. Related claims pending: None



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David P. King  
Attorney for Plaintiff



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

LAURA L. ALLEN, :  
Plaintiff :  
 :  
VS. : NO. 2003-324-C.D.  
 :  
FAWWAZ F. HINDAWI, :  
Defendant :  
 :

AFFIDAVIT OF CONSENT

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed on March 7, 2003.

2. The marriage of plaintiff and defendant is irretrievably broken and ninety days have elapsed from the date of filing 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: 8/26/03



Laura L. Allen  
Plaintiff

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

LAURA L. ALLEN,

Plaintiff

vs.

FAWWAZ F. HINDAWI,

Defendant

NO. 2003-324-C.D.

IN DIVORCE

**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 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: 8/26/03

*Laura L. Allen*

Laura L. Allen  
Plaintiff

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

LAURA L. ALLEN,

Plaintiff

vs.

FAWWAZ F. HINDAWI,

Defendant

NO. 2003-324-C.D.

AFFIDAVIT OF CONSENT

1. A Complaint in divorce under Section 3301(c) of the Divorce Code was filed on March 7, 2003.

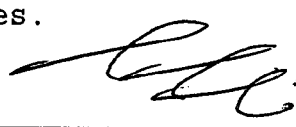
2. The marriage of plaintiff and defendant is irretrievably broken and ninety days have elapsed from the date of filing the Complaint.

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: 08/16/03

  
Fawwaz F. Hindawi  
Defendant

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

LAURA L. ALLEN,

Plaintiff

VS.

FAWWAZ F. HINDAWI,

Defendant

NO. 2003-324-C.D.

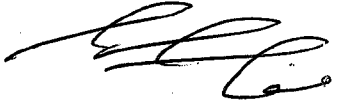
IN DIVORCE

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 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: 08/16/03

  
Fawwaz F. Hindawi  
Defendant

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

LAURA L. ALLEN,  
Plaintiff  
vs.  
FAWWAZ F. HINDAWI,  
Defendant

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: NO. 2003-324-C.D.  
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AFFIDAVIT OF NON-MILITARY SERVICE

LAURA L. ALLEN, being duly sworn according to law, deposes and says that FAWWAZ F. HINDAWI is not in the military service of the United States of America, or any state or territory thereof, or its allies, and is in no wise subject to the provisions of the Soldiers' and Sailors' Civil Relief Act of 1940, and its amendments. On the contrary, the Defendant, FAWWAZ F. HINDAWI, is an individual who is approximately 29 years of age, resides at 5204 Wythe Avenue, Apt. #3, Richmond, VA 23226, and is employed as a cook at Great Steak & Potatoe Co., Richmond, VA.

Laura L. Allen  
Laura L. Allen

Sworn to and subscribed before me  
this 12 day of July, 2003.

Margaret J. Thompson

NOTARIAL SEAL  
MARGARET J. THOMPSON, NOTARY PUBLIC  
CITY OF DUBOIS, CLEARFIELD COUNTY  
MY COMMISSION EXPIRES OCTOBER 31, 2006

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF HEALTH  
VITAL RECORDS

## RECORD OF

DIVORCE OR ANNULMENT



(CHECK ONE)



STATE FILE NUMBER

STATE FILE DATE

COUNTY

Clearfield

## HUSBAND

1. NAME (First) (Middle) (Last) Fawwaz F. Hindawi	2. DATE (Month) (Day) (Year) OF BIRTH 3 13 1974	
2. RESIDENCE Street or R.D. City, Boro. or Twp. County State 5204 Wythe Avenue, Apt. #3, Richmond VA	4. PLACE (State or Foreign Country) OF BIRTH Kingdom of Jordan	
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 Cook

## WIFE

8. MAIDEN NAME (First) (Middle) (Last) Laura L. Allen	9. DATE (Month) (Day) (Year) OF BIRTH 12 8 1962		
10. RESIDENCE Street or R.D. City, Boro. or Twp. County State 220 South Brady St., Apt. C, DuBois Clearfield PA	11. PLACE (State or Foreign Country) OF BIRTH PA		
12. NUMBER OF THIS MARRIAGE 1	13. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	14. OCCUPATION Unemployed	
15. PLACE OF OF THIS MARRIAGE (County) (State or Foreign Country) Jordan	16. DATE OF THIS MARRIAGE (Month) (Day) (Year) 1 21 1997		
17A. NUMBER OF CHILDREN THIS MARRIAGE 0	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18 0	18. PLAINTIFF HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	19. DECREE GRANTED TO HUSBAND <input type="checkbox"/> 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"/> SPLIT CUSTODY <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT No-Fault		
22. DATE OF DECREE (Month) (Day) (Year)	23. DATE REPORT SENT TO VITAL RECORDS (Month) (Day) (Year)		
24. SIGNATURE OF TRANSCRIBING CLERK			

Law Offices

DAVID P. KING

23 Beaver Drive  
P.O. Box 1016  
DuBois, PA 15801

David P. King, Esq.

Phone (814) 371-3760  
Telecopier (814) 371-4874

March 10, 2003

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
DELIVER TO ADDRESSEE ONLY

Mr. Fawwaz F. Hindawi  
5204 Wythe Avenue, Apt. #3  
Richmond, VA 23226

Dear Mr. Hindawi:

Please find enclosed a certified copy of a Divorce Complaint that we have filed on behalf of your wife, Laura, in the Court of Common Pleas of Clearfield County, Pennsylvania. On the inside of the Complaint, in paragraphs 1 through 9, you will see that the only thing that is being requested is a divorce.

Paragraph 8 of that Complaint asks for a no-fault divorce. One way that this can work is simply if the parties consent to the divorce, then neither one of them has to come to Court.

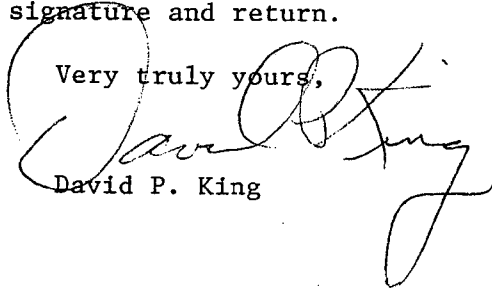
However, there is a 90 day waiting period that starts from the day that you get these papers. Once that 90 days is up, we would then send you a Consent form and also what's called a Waiver of Notice form. Laura would sign similar documents after that date.

The Consent form simply indicates that you consent to the divorce. The Waiver of Notice form simply indicates that you do not require a hearing or any further notice before the Court finalizes the divorce.

With these papers in hand, signed by you and your wife, we could then finalize the divorce, again, without any Court hearings or anyone stepping foot in the Courthouse for that matter. We would of course then send you a copy of that Divorce Decree once it was over. And again, this would be a no-fault divorce.

If you have any questions on this, I cannot really advise you as I represent Laura. Feel free to contact an Attorney of your own choosing for advice if you should so desire. Notwithstanding, we appreciate your anticipated cooperation, and when the 90 days have expired, you can expect to receive those two other papers from us by regular mail for your signature and return.

Very truly yours,

  
David P. King

DPK:pp

Enclosure

cc: Mrs. Laura L. Allen

Law Offices  
DAVID P. KING  
23 Beaver Drive  
P.O. Box 1016  
DuBois, PA 15801

COPY

David P. King, Esq.

Phone (814) 371-3760  
Telecopier (814) 371-4874

April 7, 2003

Mr. Fawwaz F. Hindawi  
5204 Wythe Avenue, Apt. #3  
Richmond, VA 23226

Dear Mr. Hindawi:

Back on March 11, 2003, we mailed to you by certified mail, return receipt requested, deliver to addressee only, a certified copy of the Divorce Complaint that we had filed on behalf of Laura Allen in the Court of Common Pleas of Clearfield County, Pennsylvania.

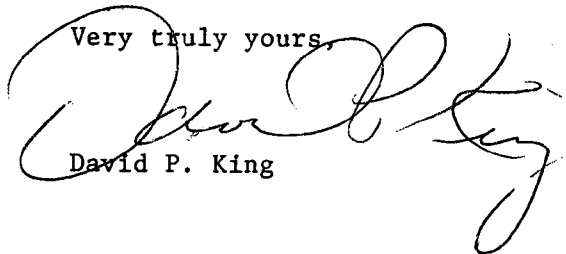
That certified letter was just returned to our office marked "UNCLAIMED".

Therefore, we are sending to you, by regular mail, another certified copy of that Divorce Complaint. Under the Pennsylvania Rules of Procedure, if this is not returned within 15 days, service is deemed complete.

For your own reference, we are enclosing a copy of our letter to you of March 10, 2003, which was sent by certified mail as referenced above on March 11, 2003. This is for explanation purposes.

Still anticipating your cooperation then, I remain,

Very truly yours,

  
David P. King

DPK:pp  
Enclosures

cc: Mrs. Laura L. Allen



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

LAURA L. ALLEN,  
Plaintiff

vs.

FAWWAZ F. HINDAWI,  
Defendant

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NO. 2003-324-C.D.

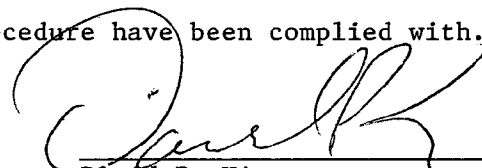
AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA

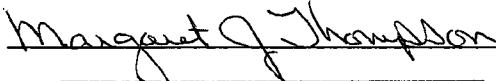
ss.

COUNTY OF CLEARFIELD

Personally appeared before me, the undersigned officer, David P. King, Esquire, who, being duly sworn according to law, deposes and says that service of the Complaint in Divorce under Section 3301(c) at the above term and number was served upon the Defendant by first sending to him a certified copy of the Divorce Complaint by certified mail, restricted delivery, to be signed by addressee only, this done on March 11, 2003. The same was returned "UNCLAIMED". Thereafter, a second certified copy of the Divorce Complaint was sent by regular mail to the Defendant at his same address, and the same was not returned within a period of 15 days, and in fact has not been returned ever. Accordingly the Rules of Civil Procedure have been complied with.

  
David P. King  
Attorney for Plaintiff

Sworn to and subscribed before me  
this 26th day of August, 2003.

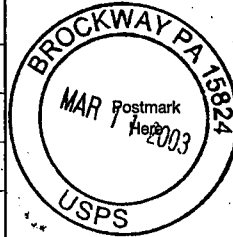


NOTARIAL SEAL  
MARGARET J. THOMPSON, NOTARY PUBLIC  
CITY OF DUBOIS, CLEARFIELD COUNTY  
MY COMMISSION EXPIRES OCTOBER 31, 2006

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$ .60
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	3.50
<b>Total Postage &amp; Fees</b>	<b>\$ 8.15</b>



**Sent To** Fawwaz F. Hindawi

**Street, Apt. No.;  
or PO Box No.** 5204 Wythe Avenue, Apt. #3

**City, State, ZIP+ 4** Richmond, VA 23226

PS Form 3800 January 2001

See Reverse for Instructions

7001 0360 0001 0442 5034

**Certified Mail Provides:**

■ A mailing receipt

■ A unique identifier for your mailpiece

■ A signature upon delivery

■ A record of delivery kept by the Postal Service for two years

**Important Reminders:**

■ Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.

■ Certified Mail is not available for any class of international mail.

■ NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider insured or Registered Mail.

■ For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.

■ For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".

■ If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

**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:

FAHWAZ F. HINDAWI  
5204 Wythe Avenue, Apt. #3  
Richmond, VA 23226

2. Article Number

(Transfer from service label)

7001 0360 0001 0442 5034

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

☒ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☒ No

3. Service Type

☒ Certified Mail

☐ Registered

☐ Insured Mail

☐ C.O.D.

☐ Express Mail

☐ Return Receipt for Merchandise

☐ Restricted Delivery? (Extra Fee)

☒ Yes

Law Offices

DAVID P. KING

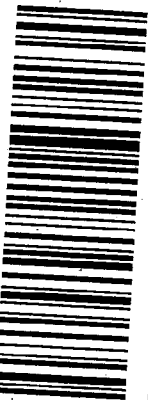
23 Beaver Drive

P.O. Box 1016

DuBois, PA 15801

151105-603

CERTIFIED MAIL



7001 0360 0001 0442 5034



UNCLAIMED

Mr. Fawwaz F. Hindawi

5204 Wythe Avenue, Apt. #3

Richmond, VA



2nd 3/19  
RTS 3/29



0000



23226

U.S. POSTAGE  
PAID  
BROCKWAY, PA  
15824  
MAR 11 2003  
\$8.15  
00022514-02

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
DELIVER TO ADDRESSEE ONLY  
TO BE SIGNED ONLY BY ADDRESSEE

LN  
3/14/03  
js

15801/1016

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

LAURA L. ALLEN,  
Plaintiff

vs.

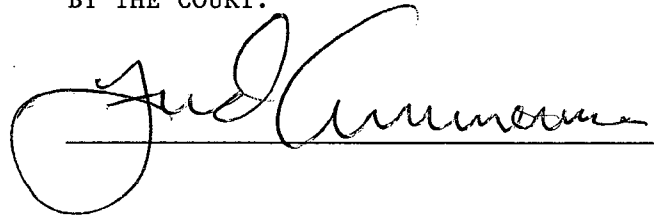
FAWWAZ F. HINDAWI,  
Defendant

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: NO. 2003-324-C.D.  
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ORDER AND DECREE

AND NOW, this 27 day of August, 2003, it is ORDERED  
AND DECREED that LAURA L. ALLEN, Plaintiff, and FAWWAZ F. HINDAWI, Defendant,  
are divorced from the bonds of matrimony.

BY THE COURT:

  
\_\_\_\_\_