

03-606-CD
TOWNSHIP OF SANDY VS. RAYMOND HAND, JR.

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

FILED

MAY 29 2003

KAREN S. BEERS,
Plaintiff

*
*
*

William A. Shaw
Prothonotary

vs.

* No. 2003-650-C.D.
*
*

RICHARD L. BEERS,
Defendant

*

ORDER FOR MEDIATION CONFERENCE and PAYMENT OF COSTS

NOW, this 29th day of May, 2003, it is ORDERED that a Custody Mediation Conference be held before Allen H. Ryen, Ph.D., Licensed Child Psychologist.

It is further ORDERED that the parties shall forthwith complete a Child Custody Mediation Questionnaire and forward the same to Dr. Ryen (416 Knarr Street, DuBois, Pennsylvania 15801) within Ten (10) days of receipt of this ORDER.

It is also ORDERED that the cost of said Mediation Conference shall be borne equally by the Plaintiff and Defendant.

Each party or counsel for that party shall deposit One Hundred Fifty (\$150.00) Dollars (money orders only) with the Clearfield County Court Administrator (230 East Market Street, Clearfield, Pennsylvania 16830) within Twenty-Five (25) days of the date of this Order to proceed with the Mediation Conference

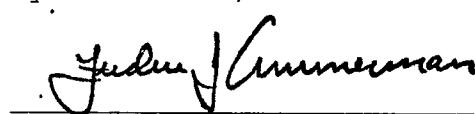
"OR" submit a Custody Consent Order to the Court within Twenty-Five (25) days of the date of this Order foregoing the Mediation Conference.

This Court shall issue a further ORDER scheduling the Mediation Conference when the required deposit has been received from both parties.

If a Custody Consent Order is received by the Court after the Twenty-Fifth day following this Order and no later than ***SEVEN (7)*** days before scheduled Mediation Conference, then each party or counsel for the parties shall include Twenty (\$20.00) Dollars (money order only) in order to defray administrative/processing expense. In this event the original money order in the amount of One Hundred Fifty (\$150.00) Dollars previously deposited by each party shall be returned.

FAILURE OF A PARTY TO DEPOSIT THE REQUIRED FEE OF 'ONE HUNDRED FIFTY (\$150.00) DOLLARS' SHALL RESULT IN THE OFFENDING PARTY BEING SUBJECT TO CONTEMPT PROCEEDINGS BEFORE THE COURT.

By the Court,



FREDRIC J. AMMERMAN

JUDGE

Attorney for the Plaintiff: Paul Colavecchi, Esquire

Attorney for the Defendant: R.R.#1, Box 206A, Cemetery RD, Coalport 16627

FILED
01110681
MAY 29 2003
SAC

William A. Shaw
Prothonotary

2 certified copies & Questionnaire to Paul Colavecchi, Esquire
1 certified copy to Defendant @ R.R.#1, Box 206A, Cemetery RD, Coalport 16627
1 copy to Judge Ammerman
1 copy to Allen H. Ryen, Ph.D.

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merriam
Shaw

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

FILED

JUN 24 2003

KAREN S. BEERS,
Plaintiff

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*

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vs.

*

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*

RICHARD L. BEERS,
Defendant

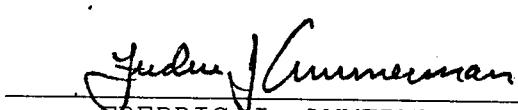
William A. Shaw
Prothonotary

No. 2003-650-C.D.

ORDER

NOW, this 24th day of June, 2003, the above named **DEFENDANT**, having failed to pay the Custody Mediation Fee pursuant to Order dated May 29, 2003, unless the above named **DEFENDANT** pays the fee due the Court Administrator in the amount of **One Hundred Fifty Dollars (\$150.00)** [by MONEY ORDER ONLY], it is the ORDER of this Court that a hearing to show cause why said **DEFENDANT** shall not be held in contempt of Court for failure to comply with said previous Order is scheduled for the 30th day of June, 2003 at 3 o'clock p.m. in Court Room No. 2 of the Clearfield County Courthouse, Clearfield, Pennsylvania at which time the **DEFENDANT** must be present or a Bench Warrant may be issued for his arrest.

BY THE COURT,



FREDRIC J. AMMERMAN
JUDGE

FILED
01 3:37 01
JUN 24 2003
SAC

William A. Shaw
Prothonotary

1 certified copy to Paul Colavecchi, Esquire

1 certified copy to Defendant @ R.R.#1, Box 206A, Cemetery Road, Coalport
16627

1 copy to Judge Ammerman

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

KAREN S. BEERS,
Plaintiff

vs.

RICHARD L. BEERS,
Defendant

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*
*

No. 2003-650-C.D.

O R D E R

NOW, this 26th day of June, 2003, the parties having provided to the Court Administrator of Clearfield County the required deposit, it is ORDERED that the **Custody Mediation Conference** be held before Allen H. Ryen, Ph.D., Licensed Child Psychologist, on **July 30, 2003 at 1:00 o'clock p.m. at the Clearfield County Courthouse.**

Please enter the Courthouse through the front door, turn left and take stairs to second floor. Courtroom No. 2 and waiting area are at the top of the stairs. Both parents, their respective counsel and the child(ren) shall attend said conference. The present custodial parent shall provide someone to attend to the child(ren) while the parent is in private conference.

FAILURE OF A PARTY TO APPEAR FOR THE MEDIATION CONFERENCE WILL RESULT IN ASSESSMENT ON THAT OFFENDING PARTY OF ALL COSTS, UNLESS SAID PARTY HAS NOTIFIED THE CLEARFIELD COUNTY COURT ADMINISTRATOR (814) 765-2641, extension 5982 AT LEAST *** SEVEN (7) *** FULL BUSINESS DAYS IN ADVANCE OF THE SCHEDULED MEDIATION CONFERENCE AND THE COURT ADMINISTRATOR HAS AGREED TO A CONTINUANCE/RESCHEDULING.

FILED

BY THE COURT,


JUDGE FREDRIC J. AMMERMAN

William A. Shaw
Prothonotary

JUN 27 2003

FILED

01 9:15 AM
JUN 27 2003

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WES

William A. Shaw
Prothonotary

2 certified copies to Paul Colavecchi, Esquire

1 certified copy to Defendant @ R.R.#1, Box 206A, Cemetery Road, Coalport
16627

1 copy to Judge Ammerman

1 copy to Allen H. Ryen, Ph.D.

1 copy to Court Administrator

62

In the Court of Common Pleas of Clearfield County, Pennsylvania
Civil Division

FILED

JUN 27 2003

KAREN S. BEERS

Plaintiff

vs.

RICHARD L. BEERS

Defendant

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William A. Shaw
Prothonotary

No. 2003-650-

C.D.

AFFIDAVIT IN SUPPORT OF PETITION TO PROCEED IN FORMA PAUPERIS

1. I am the Plaintiff/Defendant in the above matter and because of my financial condition I am unable to pay the fees and costs of prosecuting or defending the action or proceeding.
2. I am unable to obtain funds from anyone, including my family, friends and associates, to pay the costs of litigation.
3. I represent that the information below relating to my ability to pay the costs and fees is true and correct.

a. Name Richard L. Beers

Address R.R.#1, Box 206A, Cemetery Road
Coalport, Pennsylvania 16627

Social Security Number 159 - 62 - 1227

b. Date of last employment presently employed

Just went back to work three weeks ago; I was on unemployment Employer Richard Youngkin Construction
Address Lyleville, Pennsylvania child support

\$132 per week since 12/2002 Salary/Wages..... \$263 every week after
Type of work construction

c. Other Income:

| | |
|-------------------------------|-------------------|
| Business/Profession..... | \$ <u>None</u> |
| Self-employment..... | \$ <u>NO</u> |
| Interest..... | \$ <u>NO</u> |
| Dividends..... | \$ <u>NO</u> |
| Pension..... | \$ <u>NO</u> |
| Annuities..... | \$ <u>NO</u> |
| Social Security Benefits..... | \$ <u>NO</u> |
| Support Payments..... | \$ <u>NO</u> |
| Disability payments..... | \$ <u>NO</u> |
| Unemployment Compensation/ | |
| Supplements Benefits..... | \$ <u>NOT Now</u> |
| Workmen's Compensation..... | \$ <u>NO</u> |
| Public Assistance..... | \$ <u>NO</u> |
| Food Stamps..... | \$ <u>NO</u> |
| Other..... | \$ <u>None</u> |

d. Other contributions to my household support (please circle):

Name of Spouse, Boyfriend/Girlfriend, or Roommate/Housemate

None

Employer NO

Salary/wages per month..... \$ None

Type of work NO

Contributions from my child(ren) ... \$ NO

Contributions from my parent(s),
family members, or any other
individuals..... \$ NO

e. Property Owned:

| | |
|-----------------------------------|----------------|
| Cash..... | \$ <u>None</u> |
| Checking Account..... | \$ <u>None</u> |
| Savings Account..... | \$ <u>None</u> |
| Certificates of Deposit..... | \$ <u>None</u> |
| Real Estate (including home)..... | \$ <u>None</u> |
| Motor Vehicle(s) - Make | <u>None</u> |

Year _____

Cost..... \$ _____

Amount owed..... \$ _____

| | |
|--------------------|----------------|
| Stocks, bonds..... | \$ <u>None</u> |
| Other..... | \$ <u>None</u> |
| Other..... | \$ <u>None</u> |
| Other..... | \$ <u>None</u> |

f. I have the following debts:

| | | |
|----------------|--|--|
| Utilities: | \$ <u>85 .00</u> , explain | <u>Electric</u> |
| | \$ <u>29 .00</u> , explain | <u>Phone</u> |
| | \$ <u>30 .00</u> , explain | <u>cable</u> |
| | \$ <u>30 .00</u> , explain | <u>Sewerage</u> |
| Groceries: | \$ <u>100 .00</u> per week | 3 children, 15, 13 & 11 |
| Rent/Mortgage: | \$ <u>0 .00</u> , explain | 3-4 days per week at my home |
| Loan(s): | \$ <u>226 .00</u> , explain | <u>Furniture, Pay Personal Loan, etc</u> |
| Auto Expense: | \$ <u>0 .00</u> , explain | <u>None do not own car</u> |
| Child Care: | \$ <u>50</u> ^{per week} , explain | <u>clothes, toothpaste, Personal</u> |
| Miscellaneous: | \$ <u>0 .00</u> , explain | <u>etc</u> |

g. Person(s) dependent upon you for support:

Wife/Husband's name _____

Children, if any:

| | | | |
|------|----------------------|-----|-----------|
| Name | <u>Kaita Beers</u> | Age | <u>11</u> |
| Name | <u>Michael Beers</u> | Age | <u>15</u> |
| Name | <u>Steven Beers</u> | Age | <u>13</u> |
| Name | _____ | Age | _____ |
| Name | _____ | Age | _____ |
| Name | _____ | Age | _____ |

Other person(s) dependent upon you:

| | | | |
|------|-------|-----|-------|
| Name | _____ | Age | _____ |
| Name | _____ | Age | _____ |
| Name | _____ | Age | _____ |

4. I understand that I have a continuing obligation to inform the Court of improvements in my financial circumstances which would permit me to pay the costs incurred herein.

VERIFICATION

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. Section 4904, relating to Unsworn Falsification to Authorities.

June, 26: 2003

Date

Richard Bauer

Petitioner

I am finding it very difficult to keep up with my monthly bills due to the following:

1. I purchase all of my children's clothing, besides paying child support. Three months ago I spent \$385.00 for school clothes. I have receipts for the \$385.00, but my children come to me when they need spending (pocket money) to go to Lakemont, school field trips, out with their friends - \$10.00 here and there per child per week.
2. My wife is constantly taking me to Domestic Relations (4 times so far) which requires me to pay Chris Pentz \$150.00 each time and each time my child support has been lowered. My wife told me she is planning to take me to Domestics again because she has not been happy with the outcome. My wife is on welfare.

CONSENT FOR RELEASE OF CONFIDENTIAL INFORMATION

I, Richard L Beers, having filed with the Court an Affidavit requesting In Forma Pauperis standing, hereby consent to the release of any information which may be requested by the Judges of the Court of Common Pleas of Clearfield County, or by any employee of the Court Administrator's Office acting on the behalf and at the direction of any said Judge, relating to any employment compensation, Worker's Compensation, Social Security, Department of Public Welfare or Black Lung benefits which I may receive from any county, state or federal agency which administers or handles processing of any of the above described benefits. This consent shall also authorize the release to the said Court or designee of any information as to any compensation I am receiving, or have received in the past twelve (12) months, from any full or part-time employment of any type whatsoever.

This consent shall remain in effect for a period of twelve (12) months herefrom. A copy or FAX of this release shall have the same legal effect as the original.

Social Security Number: 159 - 62 - 1227

Board of Assistance Number (food stamps, etc.): None

DATE: June 1 26 03

Richard L Beers
signature

DATE: June 1 26 103

NAME: Richard L. Beers

TELEPHONE NUMBER: (814) 672 - 4420

ADDRESS: RR #1 130 X 206-3 Coalport, Pa.
16627

OTHER PARTIES INVOLVED: Plaintiff - Karen S. Beers

REASON FOR FILING THIS PETITION (Write a brief description of your financial problem(s), please be specific. Failure to do so could result in your request being delayed or denied.) (Example: request for filing fee or Mediation Conference fee to be waived due to your inability to submit the required fee because...)

Please See Page 4

I'm working 40 hrs. a week and have not missed one child support payment, my wife has a new boy friend helping her financially. I am unable to pay my bills and keep up with my children's needs as she is not able.

TYPE OF ACTION: (divorce, custody, District Justice appeal, etc. Please specify what type of action you are pursuing through this application.)

(divorce, custody, Support)
through this action custody issues.

In the Court of Common Pleas of Clearfield County, Pennsylvania

Civil Division

CP
FILED

JUN 27 2003

KAREN S. BEERS

Plaintiff

William A. Shaw
Prothonotary

vs.

RICHARD L. BEERS

Defendant

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No. 2003-650- C.D.

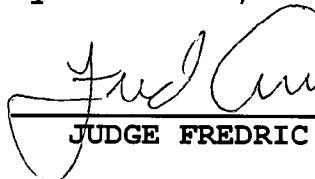
O R D E R

NOW, this 26th day of June ~~July~~ ^{FJA},
2003, upon consideration of the foregoing Affidavit in Support
of Petition to Proceed in Forma Pauperis, it is the ORDER of this
Court that said Petition is GRANTED / ~~WAIVED~~.

FJA

If the Petition is GRANTED, ~~Waived~~ / Mediation Conference
fee is hereby WAIVED.

By the Court,


JUDGE FREDRIC J. AMMERMAN

FILED

IN THE COURT OF COMMON PLEAS

JUL 30 2003

OF CLEARFIELD COUNTY, PENNSYLVANIA

A William A. Shaw
Prothonotary/Clerk of Courts

CIVIL DIVISION

KAREN S. BEERS

-VS- : No. 2003-650-CD

RICHARD L. BEERS

ORDER

NOW, this 30th day of July, 2003, this being the date set for mediation and upon agreement of the parties, it is the ORDER of this Court as follows:

1. Karen S. Beers (hereinafter mother) and Richard L. Beers (hereinafter father) shall share legal custody of their minor children; namely, Michael Beers, Steven Beers and Kayla Beers. Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this Order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians,

dentists, mental health providers and teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Mother shall have primary physical custody, subject to father's periods of partial custody as follows:

A. Every other weekend from Friday night at 6:00 p.m. until Sunday night at 6:00 p.m.;

B. On other occasions upon the request of the children and in accordance of the availability of the father for such visitation;

C. At other such times and places as the parties may agree.

3. Each party will have the right to two (2) nonconsecutive one (1) week periods of vacation with seven (7) days advance notice to the other party;

4. The parties shall alternate the holidays of Christmas, Thanksgiving, Easter, Memorial Day, Fourth of July and Labor Day;

5. Mother shall be entitled to custody of the children on Mother's Day and on her birthday, and father shall be entitled to custody of the children on Father's Day and on his birthday. The parties will share time with the children on each of the children's birthdays;

6. Either party shall have the right to contact

with the children at any reasonable time;

7. Neither party shall make any derogatory comments about the other parent to the children or to others in the children's presence, nor shall either parent discuss matters pertaining to the support, separation, divorce or other adult issues with the children;

8. Neither party shall leave the Commonwealth of Pennsylvania while enjoying physical custody of the children without notification of the other parent;

9. The parents agree to cooperate and communicate with one another in arranging pick-ups and drop-offs and other scheduling matters relating to the children;

10. Request by the children for contact with extended family members will not be unreasonably denied by either parent;

11. If either party intends to cohabit with a paramour, they shall give the other party advance notice of said intention. In such event, either party may have the option of requesting further mediation.

BY THE COURT,

Judge

We, the undersigned, hereby consent to the entry
of the above order

Karen Beers
KAREN S. BEERS
Plaintiff

Richard Beers
RICHARD L. BEERS
Defendant

Paul Cobenli
ATTORNEY FOR PLAINTIFF

FILED

03:10-B1
JUL 30 2003

William A. Shaw
Prothonotary/Clerk of Courts

EAS

2 CC Atty P. Colavecchi
1 CC Def. - RR1, Box 266 A, Cemetery Rd,
Coalport, PA
1 CC Judge Ammerman
16627

CA

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Karen S Beers
(Plaintiff)

Po Box 47
(Street Address)

Irvington, PA 16656
(City, State ZIP)

CIVIL ACTION

No. 2003-650-CJ

Type of Case: Custody

Type of Pleading: Petition

Filed on Behalf of:

Karen S Beers
(Plaintiff/Defendant)

vs.

Richard L Beers
(Defendant)

248 Cemetery Rd
(Street Address)

Coalport, PA 16627
(City, State ZIP)

FILED *Nov. 9/25/05*
OCT 03 2005

William A. Shaw
Prothonotary/Clerk of Courts

Karen S Beers
(Filed by)

(Address)

814-672-3321
(Phone)

Karen S. Beers
(Signature)

In the Court of Common Pleas of Clearfield County, Pennsylvania

Karen S Beers)
Plaintiff)
vs.) No.2003-650-CD
Richard L Beers)
Defendant)

Pro Se

PETITION FOR MODIFICATION OF CUSTODY ORDER

1. That on July 30 of 2003 an order was entered for custody in the abovementioned case. A true and correct copy of the order is attached to this petition.
2. This order should be modified because:
 - (a) The Defendant willfully, against the direct wishes of the Plaintiff, repeatedly allows the overnight visits of minor persons of the opposite sex, namely girlfriends of Michael S. Beers and Steven A. Beers (sons) during the Defendants legal visitations. This does not contribute to the moral upbringing that the Plaintiff wishes and strives for to provide for her children.
 - (b) The Plaintiff has made numerous requests for this conduct to stop, and her wishes have been ignored. A pregnancy has resulted during one such visit with Michael S. Beers(son) as the father of the child, and the Plaintiff does not wish to have any other child in the same situation.
 - (c) During the weekend visits the Defendant has left the children at night on numerous occasions, returning in the early morning hours intoxicated and verbally abusive.
 - (d) The Defendant has never taken the children for their weekly visitation period during the summer months. The Defendant always schedules his vacation after the school year starts.
 - (e) The Plaintiff asks the Court to place in effect a Modification to the existing Order to prevent the overnight visits of any member of the opposite sex during the Defendants legal visitation periods, and also to not leave the children unattended during all hours of the night. The Defendant also requests to have the summer week visit removed from the order.

WHEREFORE, the Petitioner requests that the Court modify the existing Order Visitation because it will be in the best interests of the children.

Respectfully submitted,

Karen S. Beers

Karen S. Beers
Petitioner

VERIFICATION

I, Karen S. Beers, state that the within statements in the foregoing PETITION FOR MODIFICATION OF CUSTODY ORDER are true and correct to the best of my knowledge, information, and belief. This verification is made subject to the penalties of 18 Pa C.S.A, section 4904, relating to unsworn falsifications to authorities.

Date: 10-3-05

Karen S. Beers

Karen S. Beers

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA
EXCEUTIONS - the CIVIL DIVISION
KAREN S. BEERS

-vs- 2. Neither shall the No. 2003-650-CD case be set down.
RICHARD L. BEERS is appointed mediator in this case.
C. - A. Every order from the Court at 10:00 a.m. at
8:00 a.m. NOW, this 30th day of July, 2003, this being the
date set for mediation and upon agreement of the parties,
it is the ORDER of this Court as follows:

1. Karen S. Beers (hereinafter mother) and Richard L. Beers (hereinafter father) shall share legal custody of their minor children; namely, Michael Beers, Steven Beers and Kayla Beers. Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this Order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians,

dentists, mental health providers and teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Mother shall have primary physical custody, subject to father's periods of partial custody as follows:

A. Every other weekend from Friday night at 6:00 p.m. until Sunday night at 6:00 p.m.;

B. On other occasions upon the request of the children and in accordance of the availability of the father for such visitation;

C. At other such times and places as the parties may agree.

3. Each party will have the right to two (2) nonconsecutive one (1) week periods of vacation with seven (7) days advance notice to the other party;

4. The parties shall alternate the holidays of Christmas, Thanksgiving, Easter, Memorial Day, Fourth of July and Labor Day;

5. Mother shall be entitled to custody of the children on Mother's Day and on her birthday, and father shall be entitled to custody of the children on Father's Day and on his birthday. The parties will share time with the children on each of the children's birthdays;

6. Either party shall have the right to contact

with the children at any reasonable time;

7. Neither party shall make any derogatory comments about the other parent to the children or to others in the children's presence, nor shall either parent discuss matters pertaining to the support, separation, divorce or other adult issues with the children;

8. Neither party shall leave the Commonwealth of Pennsylvania while enjoying physical custody of the children without notification of the other parent;

9. The parents agree to cooperate and communicate with one another in arranging pick-ups and drop-offs and other scheduling matters relating to the children;

10. Request by the children for contact with extended family members will not be unreasonably denied by either parent;

11. If either party intends to cohabit with a paramour, they shall give the other party advance notice of said intention. In such event, either party may have the option of requesting further mediation.

BY THE COURT

I hereby certify this to be a true and attested copy of the original statement filed in this case.

/s/John K. Reinig, Jr.

President Judge

JUL 30 2003

Attest.

Willie L. Brown
Prothonotary/
Clerk of Courts

We, the undersigned, hereby consent to the entry
of the above order

Karen S. Beers
KAREN S. BEERS
Plaintiff

Richard L. Beers
RICHARD L. BEERS
Defendant

Paul Glavonik
ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Karen S. Beers
(Plaintiff)

CIVIL ACTION

Po Box 47
(Street Address)

No. 2003-650-CO

Truona, PA 16656
(City, State ZIP)

Type of Case: Custody

Type of Pleading: Petition

VS.

Richard L. Beers
(Defendant)

Filed on Behalf of:

Karen S. Beers
(Plaintiff/Defendant)

248 Cemetery Rd
(Street Address)

Coalport, PA 16627
(City, State ZIP)

FILED
0/12/05 LM
OCT 03 2005
R

William A. Shaw
Prothonotary/Clerk of Courts

Karen S. Beers
(Filed by)

(Address)

814-672-3321
(Phone)

Karen S. Beers
(Signature)

In the Court of Common Pleas of Clearfield County, Pennsylvania

Karen S Beers)
Plaintiff)
vs.) No. 2003-650-CD
Richard L Beers)
Defendant)

CERTIFICATE OF SERVICE

I hereby certify that a Certified Copy of the REQUEST FOR MODIFICATION OF CUSTODY ORDER with reference to the above matter has been served upon the Plaintiff by mailing a true and correct copy of same to him by United States First Class Mail, postage prepaid, addressed as follows on 10.3.05:

Richard L. Beers
248 Cemetery Road
Coalport, PA 16627

Respectfully submitted,

Karen S. Beers

Karen S. Beers
PO Box 47
Irvona, PA 16656
(814)672-3321

**In the Court of Common Pleas of Clearfield County, Pennsylvania
CIVIL ACTION**

Karen S Beers)
Plaintiff)
vs.) No. 2003-650-CD
Richard L Beers)
Defendant)

FILED
0134981
OCT 27 2005
(K)

NOTICE AND ORDER TO APPEAR

William A. Shaw
Prothonotary/Clerk of Courts

2000-01-01

en Brix

PO DDx4 1

Irving, PA 16

Legal proceedings have been brought against you regarding a modification of an order of the court for legal custody.

If you wish to defend against the claim set forth in the following pages, you may but are not required to file in writing with the court your defenses or objections.

Whether or not you file in writing with the court your defenses or objections, you must appear in person in court on December 9, 2005, at 9:00 A.M. in Courtroom 2, at the Clearfield County Courthouse, Clearfield, Pennsylvania.

IF YOU DO NOT APPEAR IN PERSON, THE COURT MAY ISSUE A WARRANT FOR YOUR ARREST.

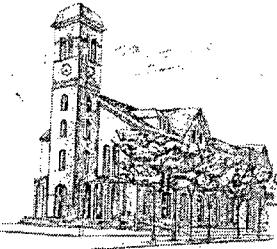
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR
Clearfield County Courthouse
Clearfield, PA 16830
(814)765-2641, Ext 5982

BY THE COURT:

October 25, 2005

Paul E. Cleary
Judge



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

David S. Ammerman
Solicitor

Jacki Kendrick
Deputy Prothonotary

Bonnie Hudson
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

Date: September 19, 2005

Over the past several weeks, it has come to my attention that there is some confusion on court orders over the issue of service. To attempt to clear up this question, from this date forward until further notice, this or a similar memo will be attached to each order, indicating responsibility for service on each order or rule. If you have any questions, please contact me at (814) 765-2641, ext. 1331. Thank you.

Sincerely,

William A. Shaw
Prothonotary

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s)/Attorney(s)

Defendant(s)/Attorney(s)

Other

Special Instructions:

CAT

FILED QCC Atty P/Clerical
01/01/25/01 1cc Def.
DEC 13 2005 248 Cemetery Rd.
Coalport, PA 16627
BS William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

KAREN S. BEERS

:

VS.

: NO. 03-650-CD

RICHARD L. BEERS

:

O R D E R

NOW, this 9th day of December, 2005, this being the date set for Hearing on Petition for Modification of Custody Order filed by Plaintiff, Karen S. Beers; Defendant, Richard L. Beers having failed to appear despite receiving due and proper notice; upon presentation of the issues before the Court, it is the Order of this Court that said Petition be and is hereby Granted. This Court's Order of July 30, 2003, shall be and is hereby Amended as follows:

1. During Richard L. Beers' periods of partial custody of the minor children, he shall not permit any member of the opposite sex to stay overnight. Overnight shall mean no later than 12:00 a.m. midnight.

2. Richard L. Beers shall not consume alcoholic beverages prior to or during his periods of partial custody of the minor children.

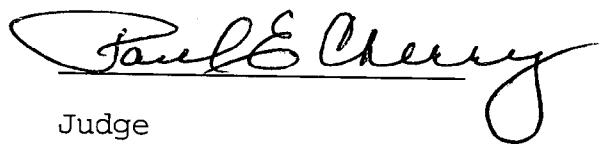
3. During his periods of partial custody of the minor children, Richard L. Beers shall not leave the minor children unattended for a period longer than two (2) hours.

4. Paragraph 3 of this Court's Order of July 30, 2003,

shall be and is hereby vacated.

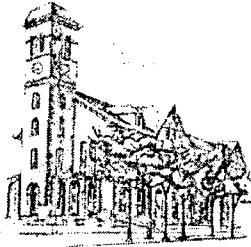
All other terms and provisions of the Court's Order of July 30, 2003 not inconsistent herewith shall continue to be in full force and effect.

BY THE COURT,



A handwritten signature in black ink, appearing to read "Paul E. Cherry". The signature is fluid and cursive, with a small oval flourish preceding the name.

Judge



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

David S. Ammerman
Solicitor

Jacki Kendrick
Deputy Prothonotary

Bonnie Hudson
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

Date: September 19, 2005

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William A. Shaw
Prothonotary

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The Prothonotary's office has provided service to the following parties:

Plaintiff(s)/Attorney(s)

Defendant(s)/Attorney(s)

Other

Special Instructions:

03-650-CD Karen S. Beers vs. Richard L. Beers

2/14/06 Tuesday

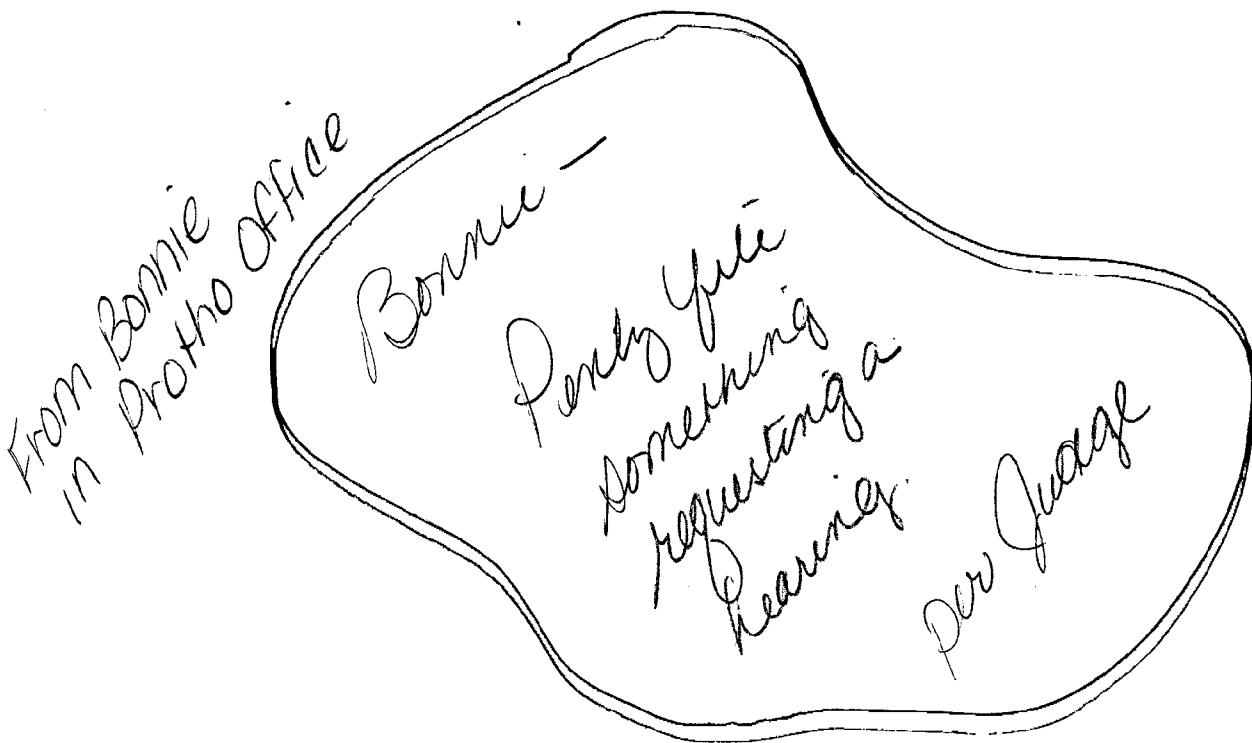
Chris Pentz and Richard Beers came to the Prothonotary's office and reviewed this file. Chris does not represent Richard Beers at this time. Chris brought the following problem to my attention:

October 3, 2005, Karen Beers, pro se, filed a Petition for Modification of a custody order and a certificate of service for the Petition. It was initially rejected by the court for failure to provide a scheduling order. She later submitted a scheduling order, and the order was signed October 25, 2005. I sent two certified copies back to her, as would be standard procedure. However, I made a mistake and the memo regarding service in our file indicates that our office served both sides. I can only assume hers said the same thing. She did not file a certificate of service regarding the order, and Richard Beers claims to have not received notice of the hearing.

On December 9, 2005, a hearing was held and Karen Beers' Petition was granted because Richard Beers did not appear. Both Karen Beers (by her attorney of record Paul Colavecchi) and Richard Beers received copies of the order that resulted from the hearing.

Chris inquired if a hearing could be rescheduled, and if it can be, what would need to be filed, either by himself if he chooses to represent Richard Beers or by Richard Beers himself.

I apologize for my mistake. We asked the Defendant for his current address, and the one we have on file is correct.



After I called Mr. Beers, there was no answer. I left a message with Chris Pentz's office.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION
No. 03-CD

KAREN S. BEERS,
PLAINTIFF

vs.

RICHARD L. BEERS,
DEFENDANT

COMPLAINT FOR CUSTODY

11 AM April 29, 2003
APR 29 2003
M 3:29 AM
3 cc 44y P. Colavecchi

William A. Shaw
Prothonotary

COLAVECCHI
RYAN & COLAVECCHI

ATTORNEYS AT LAW
221 EAST MARKET STREET
(ACROSS FROM COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA 16830