

03-643-CD  
PATRICIA B. UNCH vs. SAMUEL J. UNCH, JR.



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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

ORDER OF COURT

You, SAMUEL J. UNCH, JR., Respondent, have been sued in Court to obtain custody of the following children: Nathan P. Unch.

You are ordered to appear in person on the 30 day of May, 2003, at 9:00 A.m. for a custody conference. Please report to the Court Administrator's Office, 2nd Floor, Clearfield County Courthouse, Clearfield, Pennsylvania 16830. You will be directed as to where the conference will be held.

If you fail to appear as provided by this Order, an Order for custody, partial custody or visitation may be entered against you or the court may issue a warrant for your arrest.

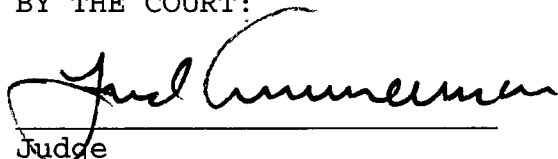
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
(814) 765-2641

BY THE COURT:

DATE:

4/29/03

  
Judge

FILED

APR 29 2003

William A. Shaw  
Prothonotary

FILED

2cc  
of 2:23 PM  
APR 29 2003  
Amy Noddle

William A. Shaw  
Prothonotary  
C  
K25

AMERICAN WITH DISABILITIES ACT OF 1990

The Court of Common Pleas of Clearfield County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the court, please contact our office. All arrangements must be made at least 72 hours prior to any hearing or business before the court. You must attend the scheduled conference or hearing.

Date: \_\_\_\_\_

\_\_\_\_\_  
District Court Administrator

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

PATRICIA B. UNCH	*		
Plaintiff	*		
	*		
vs.	*	No. 03 -	- CD
	*		
SAMUEL J. UNCH, JR.,	*		
Defendant	*		

**NOTICE TO DEFEND AND CLAIM RIGHTS**

You have been sued in Court for:

<input checked="" type="checkbox"/> Divorce	<input type="checkbox"/> Annulment of Marriage
<input type="checkbox"/> Support	<input checked="" type="checkbox"/> Custody and Visitation
<input checked="" type="checkbox"/> Division of Property	<input type="checkbox"/> Alimony
<input type="checkbox"/> Temporary Alimony	<input type="checkbox"/> Attorney Fees
<input type="checkbox"/> Costs	<input type="checkbox"/> Adultery

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 judgement 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 of Clearfield County, William Shaw, Prothonotary & Clerk of Courts, Clearfield County Courthouse, Clearfield, Pennsylvania.

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.

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

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - - CD

C O M P L A I N T

COUNT I - DIVORCE

NOW COMES the Plaintiff, Patricia B. Unch, and by her attorney, James A. Naddeo, Esquire, sets forth the following:

1. That the Plaintiff is Patricia B. Unch, an individual, who currently resides at 1107 Turnpike Avenue, Clearfield, Pennsylvania 16830.

2. That the Defendant is Samuel J. Unch, Jr., an individual, who currently resides at 709 Maxwell Street, Clearfield, Pennsylvania 16830.

3. That the Plaintiff and the Defendant are sui juris and Plaintiff has been a bona fide resident of the Commonwealth of Pennsylvania for a period of more than six months immediately preceding the filing of this Complaint.

4. That the parties were married on July 1, 1994, in Clearfield, Clearfield County, Pennsylvania.

5. There has been an irretrievable breakdown of the marriage relationship of the parties within the meaning of Act No. 26, Sections 3301(c) and (d) of the Commonwealth of Pennsylvania of 1980.

6. That there was one child born to the marriage; namely, Nathan P. Unch (d.o.b. 11/30/94).

7. No prior action for divorce or annulment is pending.

8. Plaintiff has been advised that counseling is available and that Plaintiff may have the right to request that the Court require the parties to participate in counseling.

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

#### COUNT II - EQUITABLE DISTRIBUTION

9. Paragraphs One through Eight of this Complaint are incorporated herein by reference and made a part hereof as though set forth in full.

10. Plaintiff and Defendant have legally and beneficially acquired property both real and personal during their marriage from July 1, 1994, to the present.

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



12. That an Inventory and Appraisement of all property owned or possessed by Plaintiff will be supplied in accordance with the Divorce Code.

WHEREFORE, Plaintiff requests your Honorable Court to equitably divide all marital property.

COUNT V - CUSTODY

13. That the Plaintiff incorporates Paragraphs One through Twelve of this Complaint herein by reference and makes them a part hereof.

14. That the Plaintiff seeks custody of the following child:

Nathan P. Unch  
d.o.b.: 11/30/94  
Age - 8

That the child was not born out of wedlock.

That the child is presently in the custody of Patricia B. Unch, 1107 Turnpike Avenue, Clearfield, Pennsylvania.

That during the past five (5) years, the child has resided with the following persons and at the following addresses:

Samuel J. Unch, Jr.  
Patricia B. Unch  
709 Maxwell Street  
Clearfield, PA 16830

April 1998 to April 17, 2003

Patricia B. Unch  
1107 Turnpike Avenue  
Clearfield, PA 16830

April 17, 2003, to Present

That the mother of the child is Patricia B. Unch whose current address is 1107 Turnpike Avenue, Clearfield, Pennsylvania 16830.

She is married.

That the father of the child is Samuel J. Unch, Jr., whose current address is 709 Maxwell Street, Clearfield, Pennsylvania 16830.

He is married.

15. That the relationship of Plaintiff to the child is that of natural mother. Plaintiff currently resides with the following person: Son.

16. That the relationship of Defendant to the child is that of natural father. Defendant currently resides with the following persons: Self.

17. Plaintiff has not participated as a party or witness, or in another capacity, in other litigation concerning the custody of the child in this or another court.


Plaintiff has no information of a custody proceeding concerning the child pending in a court of this Commonwealth.

Plaintiff does not know of a person not a party to the proceedings who has physical custody of the child or claims to have custody or visitation rights with respect to the child.

18. That the best interest and permanent welfare of the child will be served by granting the relief requested because,

A. Plaintiff has been nurturing parent since birth.

WHEREFORE, Plaintiff respectfully requests Your Honorable Court to grant her custody of the child.

  
James A. Naddeo, Esquire  
Attorney for Plaintiff



APR 28 1963  
3:41 PM  
2 CC Atty Naddoo  
Atty pd. 115.00

William A. Shaw  
Prothonotary

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

PATRICIA B. UNCH,  
Plaintiff

VS.

SAMUEL J. UNCH, JR.,  
Defendant

: NO. 03 - 643 - C.D.  
:  
: PRAECIPE FOR ENTRY  
: OF APPEARANCE  
:  
: Filed on Behalf of:  
: Defendant, SAMUEL J.  
: UNCH, JR.  
:  
: Counsel of Record for  
: This Party:  
:  
: JOHN R. RYAN, ESQUIRE  
: Pa. I.D. #38739  
:  
: BELIN & KUBISTA  
: 15 North Front Street  
: P.O. Box 1  
: Clearfield, PA 16830  
: (814) 765-8972

FILED

MAY 23 2003

William A. Shaw  
Prothonotary

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

PATRICIA B. UNCH,  
Plaintiff

VS.

SAMUEL J. UNCH, JR.,  
Defendant

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NO. 03 - 643 - C.D.

PRAEIPCE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Defendant, SAMUEL J. UNCH, JR., in the  
above-captioned matter.

BELIN & KUBISTA

  
\_\_\_\_\_  
John R. Ryan, Esquire

NC  
0/10:38.87  
10/10



**In The Court of Common Pleas of Clearfield County, Pennsylvania**  
UNCH, PATRICIA B. Sheriff Docket # 14082  
VS. 03-643-CD  
UNCH, SAMUEL J. JR.  
COMPLAINT IN DIVORCE, LETTER & CHILDREN FIRST

**SHERIFF RETURNS**

NOW MAY 27, 2003 RETURN THE WITHIN COMPLAINT IN DIVORCE, LETTER & CHILDREN "NOT SERVED AT DIRECTION OF ATTORNEY" AS TO SAMUEL J. UNCH, JR., DEFENDANT.

**FILED**  
PA 0 9:55 AM  
MAY 28 2003

William A. Shaw  
Prothonotary

**Return Costs**

Cost	Description
18.37	SHERIFF HAWKINS PAID BY: ATTY CK# 8773
10.00	SURCHARGE PAID BY: ATTY CK# 8774

Sworn to Before Me This

28 Day Of May 2003  
William A. Shaw

So Answers,

Chester A. Hawkins  
Lyn Marlyn Harris  
Chester A. Hawkins  
Sheriff

**JAMES A. NADDEO**

ATTORNEY AT LAW  
211½ EAST LOCUST STREET  
MARINO BUILDING  
P.O. BOX 552  
CLEARFIELD, PENNSYLVANIA 16830

TELEPHONE  
(814) 765-1601  
TELECOPIER  
(814) 765-8142

ASSOCIATE  
LINDA C. LEWIS

April 30, 2003

Samuel J. Unch, Jr.  
709 Maxwell Street  
Clearfield, PA 16830

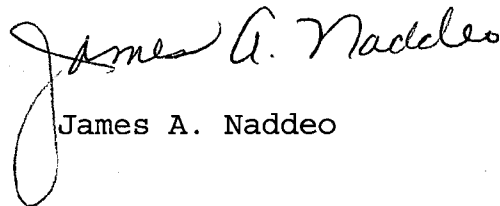
Re: Unch vs. Unch

Dear Mr. Unch

Enclosed please find certified copy of Complaint which I have filed on behalf of your wife. Please note that a custody conference has been scheduled for May 30, 2003, at 9:00 a.m.

I am also enclosing registration form for the Children First Program. You must register to attend this seminar within sixty days of April 28, 2003.

Sincerely,



James A. Naddeo

JAN/jlr

Enclosures

cc: Ms. Patricia B. Unch

Regular and Certified Mail

# Children First

The Children First seminar is one three hour mandated session aimed at helping parents gain insight into their children's needs while undergoing the transitions of divorce.

The seminar is a collaborative effort between the 46th Judicial District Court and the CCLSS. The seminar was developed by these groups out of sincere concern for the potential damaging effect of divorce on children.

Research shows that divorce is a painful and confusing experience for all children. Even the most caring parents will find it difficult to focus their attention on the needs of their children while going through the divorce. Children First can help parents keep in touch with their children's needs and provide parents with knowledge and skills to help their children.

This seminar is educational in nature. It does not deal with legal or personal issues. It is not a counseling group. Most parents who attend similar seminars around the country find them to be worthwhile.

## WHO ATTENDS CHILDREN FIRST?

Any interested parent or professional is invited to attend, however, it is a mandatory session for all parents of dependent children who file for divorce in the county. It must be completed within 60 days after filing, in order to avoid being in contempt of court.

## WHEN AND WHERE ARE THE SESSIONS HELD?

The sessions are held at the Clearfield County League on Social Services, Inc. at 107 1/2 East Market Street, Clearfield, PA 16830. Sessions are from 6:00pm until 9:00pm on the first and third Monday of every month.

**WHO TEACHES THE SESSIONS?** The teachers are Master Level Professionals with degrees in counseling, social work, or parent education.

**WHAT IS THE COST?** The fee for the seminar is \$40 per person and is **payable only by cash or money order, one week prior to the seminar. No personal checks please.**

**HOW DO I REGISTER?** Parents can fill out the attached registration form, call to register, and mail in the form with the proper fee, to the address on the form.

**WHAT WILL I LEARN?** The seminar focuses on the history of divorce, the effects on children, how to maintain a meaningful relationship with your child, and how to not place your child in the middle of a divorce situation.

Participants receive a certificate of completion after the end of the seminar. Seminars begin and end on time. No late arrivals are accepted and no one is permitted to leave early.

**(There will be NO EXCEPTIONS to this rule.)**

## CHILDREN FIRST SEMINAR Registration Form

Name (Print name as it appears on court record.) \_\_\_\_\_  
Address \_\_\_\_\_  
Home Phone \_\_\_\_\_ Work Phone \_\_\_\_\_  
Preferred Date to Attend \_\_\_\_\_

**PLEASE CALL OFFICE TO CONFIRM DATE THAT YOU WISH TO ATTEND.**

**CASH OR MONEY ORDER ONLY** in amount of \$40 enclosed (Payable to CCLSS) one week prior to attendance. **No personal checks please.** Return form and payment to:

Clearfield County League on Social Services, Inc.  
10438 Clearfield-Curwensville Highway  
Clearfield, PA 16830 814-765-2613 or 1-800-970-7349

# Children First

## 2003 CHILDREN FIRST SEMINAR DATES:

January 6, 2003  
January 20, 2003  
February 3, 2003  
February 17, 2003  
March 3, 2003  
March 17, 2003  
April 7, 2003  
April 21, 2003  
May 5, 2003  
May 19, 2003  
June 2, 2003  
June 16, 2003  
July 7, 2003  
July 21, 2003  
August 4, 2003  
August 18, 2003  
September 1, 2003  
September 15, 2003  
October 6, 2003  
October 20, 2003  
November 3, 2003  
November 17, 2003  
December 1, 2003  
December 15, 2003



Nurturing Children through  
the Adjustment of Divorce

Presented by  
Clearfield Co. League on  
Social Services, Inc. (CCLSS)  
for

Clearfield County Court of  
Common Pleas  
46th Judicial District  
Commonwealth of  
Pennsylvania

Prothonotary/  
Clerk of Courts

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

ORDER OF COURT

You, SAMUEL J. UNCH, JR., Respondent, have been sued in Court to obtain custody of the following children: Nathan P. Unch.

You are ordered to appear in person on the 30 day of May, 2003, at 9:00 A.m. for a custody conference. Please report to the Court Administrator's Office, 2nd Floor, Clearfield County Courthouse, Clearfield, Pennsylvania 16830. You will be directed as to where the conference will be held.

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Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
(814) 765-2641

BY THE COURT:

/s/ Fredric J. Ammerman

DATE: 4/29/03

Judge

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

APR 29 2003

Attest.

*William A. Ammerman*  
Prothonotary/  
Clerk of Courts

AMERICAN WITH DISABILITIES ACT OF 1990

The Court of Common Pleas of Clearfield County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the court, please contact our office. All arrangements must be made at least 72 hours prior to any hearing or business before the court. You must attend the scheduled conference or hearing.

Date: \_\_\_\_\_

\_\_\_\_\_  
District Court Administrator

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

PATRICIA B. UNCH	*		
Plaintiff	*		
	*		
vs.	*	No. 03 -	- CD
	*		
SAMUEL J. UNCH, JR.,	*		
Defendant	*		

NOTICE TO DEFEND AND CLAIM RIGHTS

You have been sued in Court for:

<input checked="" type="checkbox"/> Divorce	<input type="checkbox"/> Annulment of Marriage
<input type="checkbox"/> Support	<input checked="" type="checkbox"/> Custody and Visitation
<input checked="" type="checkbox"/> Division of Property	<input type="checkbox"/> Alimony
<input type="checkbox"/> Temporary Alimony	<input type="checkbox"/> Attorney Fees
<input type="checkbox"/> Costs	<input type="checkbox"/> Adultery

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 judgement 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 of Clearfield County, William Shaw, Prothonotary & Clerk of Courts, Clearfield County Courthouse, Clearfield, Pennsylvania.

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.

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



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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - - CD

C O M P L A I N T

COUNT I - DIVORCE

NOW COMES the Plaintiff, Patricia B. Unch, and by her attorney, James A. Naddeo, Esquire, sets forth the following:

1. That the Plaintiff is Patricia B. Unch, an individual, who currently resides at 1107 Turnpike Avenue, Clearfield, Pennsylvania 16830.

2. That the Defendant is Samuel J. Unch, Jr., an individual, who currently resides at 709 Maxwell Street, Clearfield, Pennsylvania 16830.

3. That the Plaintiff and the Defendant are sui juris and Plaintiff has been a bona fide resident of the Commonwealth of Pennsylvania for a period of more than six months immediately preceding the filing of this Complaint.

4. That the parties were married on July 1, 1994, in Clearfield, Clearfield County, Pennsylvania.

5. There has been an irretrievable breakdown of the marriage relationship of the parties within the meaning of Act No. 26, Sections 3301(c) and (d) of the Commonwealth of Pennsylvania of 1980.

6. That there was one child born to the marriage; namely, Nathan P. Unch (d.o.b. 11/30/94).

7. No prior action for divorce or annulment is pending.

8. Plaintiff has been advised that counseling is available and that Plaintiff may have the right to request that the Court require the parties to participate in counseling.

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

#### COUNT II - EQUITABLE DISTRIBUTION

9. Paragraphs One through Eight of this Complaint are incorporated herein by reference and made a part hereof as though set forth in full.

10. Plaintiff and Defendant have legally and beneficially acquired property both real and personal during their marriage from July 1, 1994, to the present.

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

12. That an Inventory and Appraisement of all property owned or possessed by Plaintiff will be supplied in accordance with the Divorce Code.

WHEREFORE, Plaintiff requests your Honorable Court to equitably divide all marital property.

COUNT V - CUSTODY

13. That the Plaintiff incorporates Paragraphs One through Twelve of this Complaint herein by reference and makes them a part hereof.

14. That the Plaintiff seeks custody of the following child:

Nathan P. Unch  
d.o.b.: 11/30/94  
Age - 8

That the child was not born out of wedlock.

That the child is presently in the custody of Patricia B. Unch, 1107 Turnpike Avenue, Clearfield, Pennsylvania.

That during the past five (5) years, the child has resided with the following persons and at the following addresses:

Samuel J. Unch, Jr.  
Patricia B. Unch  
709 Maxwell Street  
Clearfield, PA 16830

April 1998 to April 17, 2003

Patricia B. Unch  
1107 Turnpike Avenue  
Clearfield, PA 16830

April 17, 2003, to Present

That the mother of the child is Patricia B. Unch whose current address is 1107 Turnpike Avenue, Clearfield, Pennsylvania 16830.

She is married.

That the father of the child is Samuel J. Unch, Jr., whose current address is 709 Maxwell Street, Clearfield, Pennsylvania 16830.

He is married.

15. That the relationship of Plaintiff to the child is that of natural mother. Plaintiff currently resides with the following person: Son.

16. That the relationship of Defendant to the child is that of natural father. Defendant currently resides with the following persons: Self.

17. Plaintiff has not participated as a party or witness, or in another capacity, in other litigation concerning the custody of the child in this or another court.

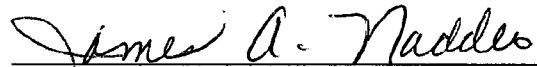
Plaintiff has no information of a custody proceeding concerning the child pending in a court of this Commonwealth.

Plaintiff does not know of a person not a party to the proceedings who has physical custody of the child or claims to have custody or visitation rights with respect to the child.

18. That the best interest and permanent welfare of the child will be served by granting the relief requested because,

A. Plaintiff has been nurturing parent since birth.

WHEREFORE, Plaintiff respectfully requests Your Honorable Court to grant her custody of the child.

A handwritten signature in cursive script, reading "James A. Naddeo", is written over a horizontal line.

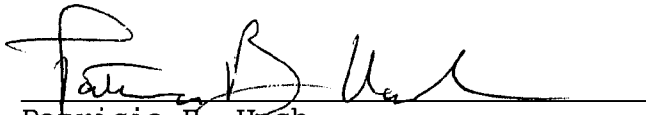
James A. Naddeo, Esquire  
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA )

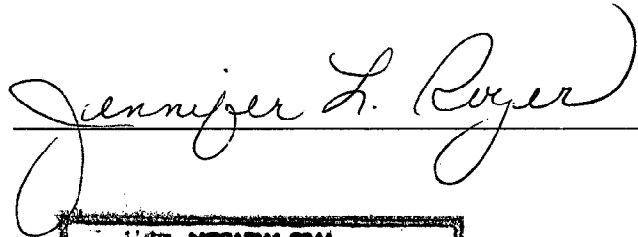
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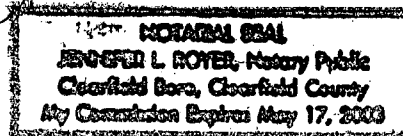
COUNTY OF CLEARFIELD )

Before me, the undersigned officer, personally appeared PATRICIA B. UNCH, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information and belief.

  
Patricia B. Unch

SWORN and SUBSCRIBED before me this 23rd day of April, 2003.





FILED  
APR 28 1963  
3:41 PM  
Atty. pd. 115.00  
Atty. MacCleo

William A. Shyne  
Prothonotary

William A. Shaw  
Prothonotary



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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

ACCEPTANCE OF SERVICE

I, JOHN R. RYAN, Esquire, do hereby accept service of the  
Complaint filed by James A. Naddeo, Esquire, on behalf of the  
Defendant, Samuel J. Unch, Jr., in the above-captioned action.

  
\_\_\_\_\_  
John R. Ryan, Esquire

Date: 5/28/03

423  
10:56:01  
C/0:56:01

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

PATRICIA B. UNCH,  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

NO. 03 - 643 - C.D.

FILED

JUN 02 2003

William A. Shaw  
Prothonotary

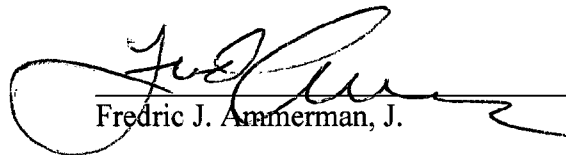
CUSTODY CONSENT ORDER

AND NOW, this 30 day of May, 2003, the parties having reached agreement as to the custody of their minor child Nathan P. Unch, d.o.b. 11/30/94, and having acknowledged their consent to the entry of this Order, it is ORDERED as follows:


1. Patricia B. Unch (hereinafter "Mother") and Samuel J. Unch, Jr. (hereinafter "Father") shall share joint legal custody of the said minor child. Shared legal custody is to include, but not be limited to, the right of Father and Mother to obtain, upon request, report cards and other relevant information concerning the progress of the child in school as well as medical, dental, ocular, psychological and counseling information pertaining to the child. A copy of this Order shall be sufficient to enable any school official and any medical, dental, ocular, psychological or counseling provider to release information or copies thereof to either Father or Mother.
2. Mother shall have primary physical custody of the said minor child.
3. Father shall have periods of partial custody as follows:
  - a. Every other weekend from Friday until Sunday with the specific times to be agreed upon by the parties;

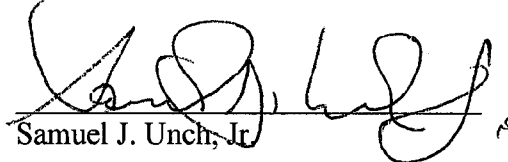
- b. At such other times as the parties may agree.
4. Should Mother require someone to provide child care while she is working, and should Father be available, Father shall be given first option to provide such care for the minor child before the child is placed in the care of a third party.
5. Neither party shall make derogatory statements regarding the other in the presence of the minor child, nor shall they permit anyone else to do so.
6. Both parties shall have reasonable telephone contact with the minor child when he is in the physical custody of the other party.

BY THE COURT:

  
Fredric J. Ammerman, J.

We, the undersigned, hereby consent to the entry of the above Order.

  
Patricia B. Unch

  
Samuel J. Unch, Jr.

3CC  
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

PATRICIA B. UNCH,  
Plaintiff

VS.

SAMUEL J. UNCH, JR.,  
Defendant

: NO. 03 - 643 - C.D.  
:  
: PETITION FOR LEAVE  
: TO WITHDRAW  
:  
: Filed on Behalf of:  
: Samuel J. Unch, Jr.,  
: Defendant  
:  
: Counsel of Record for  
: This Party:  
:  
: JOHN R. RYAN, ESQUIRE  
: Pa. I.D. #38739  
:  
: BELIN & KUBISTA  
: 15 North Front Street  
: P.O. Box 1  
: Clearfield, PA 16830  
: (814) 765-8972

**FILED**

**DEC 05 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

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

PATRICIA B. UNCH,  
Plaintiff

VS.

SAMUEL J. UNCH, JR.,  
Defendant

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NO. 03 - 643 - C.D.

RULE

AND NOW, this 8<sup>th</sup> day of December, 2003,  
upon consideration of the attached Petition for Leave to  
Withdraw as Counsel, it is hereby ORDERED and DIRECTED that a  
rule be issued upon Respondent to show cause why said Petition  
should not be granted.

Rule returnable the 31 day of December,  
2003, for filing a written response.

BY THE COURT:

Judith J. Ammann

FILED

DEC 08 2003

William A. Shaw  
Prothonotary/Clerk of Courts

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

PATRICIA B. UNCH,	:	
Plaintiff	:	
	:	
VS.	:	NO. 03 - 643 - C.D.
	:	
SAMUEL J. UNCH, JR.,	:	
Defendant	:	

PETITION FOR LEAVE TO WITHDRAW AS COUNSEL

AND NOW, comes John R. Ryan, Esquire, counsel for the  
above-named Defendant, and petitions your Honorable Court as  
follows:

1. On or about May 23, 2003, your Petitioner was retained  
as counsel for Samuel J. Unch, Jr. in the above-  
captioned action in divorce.
2. Since that time, your Petitioner has performed various  
services on behalf of the Defendant.
3. Among the services rendered by your Petitioner was the  
negotiation with counsel for Plaintiff of a resolution  
of the economic issues in the above-referenced  
divorce. In August of 2003, the Defendant indicated  
to Petitioner that a proposed settlement was  
acceptable to him. That information was communicated



to counsel for Plaintiff by letter dated August 18, 2003.

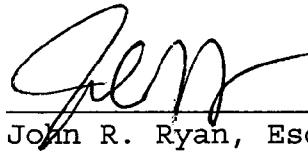
4. Under cover of letter dated August 21, 2003, counsel for Plaintiff forwarded a proposed Marriage Settlement Agreement for review.
5. Your Petitioner forwarded the proposed Agreement to Defendant by letter dated August 22, 2003, indicating that the Agreement was consistent with the discussions between the parties and requested that Defendant confirm that the Agreement was acceptable to him.
6. As of the time of the filing of this Petition, the Defendant has failed and refused to communicate his acceptance of the Agreement despite the fact that prior to the drafting of the Agreement, he had agreed to the terms thereof. Your Petitioner has written to Defendant on a number of occasions regarding this matter with no response.
7. Your Petitioner cannot effectively represent the interests of the Defendant if the Defendant fails to communicate with your Petitioner.
8. It is believed and therefore averred that the Plaintiff would have the basis to enforce the terms of the Agreement based on communication between your

Petitioner and counsel for the Plaintiff, which conceivably could place your Petitioner in the position of having to testify as to the Defendant's acceptance of the terms thereof.

WHEREFORE, Petitioner respectfully requests that the Court grant him leave to withdraw as attorney for the Defendant.

Respectfully submitted,

BELIN & KUBISTA

A handwritten signature in cursive script, appearing to read 'J. Ryan', is written over a horizontal line.

John R. Ryan, Esquire  
Attorney for Defendant

DEC 05 2003  
DEC 05 2003  
300  
Att. Ryan  
SAS

CA

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

PATRICIA B. UNCH,  
Plaintiff

vs.

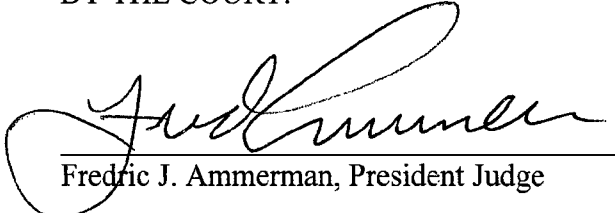
SAMUEL J. UNCH, JR.,  
Defendant

NO. 03 - 643 - C.D.

**ORDER**

AND NOW, this 2nd day of January, 2004, a Rule having been issued on the Defendant, SAMUEL J. UNCH, JR., to show cause why the Petition of John R. Ryan, Esquire, for Leave to Withdraw as Counsel should not be granted, and no objection or answer having been filed thereto, it is the ORDER of this Court that John R. Ryan, Esquire, be and is hereby granted leave to withdraw as counsel for SAMUEL J. UNCH, JR..

BY THE COURT:

  
Fredric J. Ammerman, President Judge

FILED

JAN 06 2004

William A. Shaw  
Prothonotary

2 Ltr to Htr ~~201~~

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

NOTICE

If you wish to deny any of the statements set forth in this Affidavit, you must file a Counter-Affidavit within twenty (20) days after this Affidavit has been served on your or the statements will be admitted.

AFFIDAVIT UNDER SECTION 3301(d) OF THE DIVORCE CODE

1. The parties to this action separated on February 1, 2002, and have continued to live separate and apart for a period of at least two years.

2. The marriage is irretrievably broken.

3. 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. Section 4904 relating to unsworn falsification to authorities.

Date:

2/10/04

  
Patricia B. Unch

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

PATRICIA B. UNCH	*	
Plaintiff	*	
	*	
vs.	*	No. 03 - 643 - CD
	*	
SAMUEL J. UNCH, JR.,	*	
Defendant	*	

COUNTER-AFFIDAVIT UNDER SECTION 3301(d) OF THE DIVORCE CODE

1. Check either (a) or (b):

( ) I do not oppose the entry of a divorce decree.

( ) I oppose the entry of a divorce decree because

(Check (i), (ii) or both):

( ) (i) The parties to this action have not lived  
separate and apart for a period of at least two years.

( ) (ii) The marriage is not irretrievably broken.

2. Check either (a) or (b):

( ) (a) I do not wish to make any claims for economic relief. 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.

( ) (b) I wish to claim economic relief which may include alimony, division of property, lawyer's fees or expenses or other important rights.

I understand that in addition to checking (b) above, I must also file all of my economic claims with the Prothonotary in writing and serve them on the other party. If I fail to do so before the date set forth on the Notice of intention to Request Divorce Decree, the divorce decree may be entered without further delay.

I verify that the statements made in this counter-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.

Date: \_\_\_\_\_

\_\_\_\_\_  
Samuel J. Unch, Jr.

**NOTICE:** If you do not wish to oppose the entry of a divorce decree and you do not wish to make any claim for economic relief, you should not file this Counter-Affidavit.



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

PATRICIA B. UNCH	*	
Plaintiff	*	
	*	
vs.	*	No. 03 - 643 - CD
	*	
SAMUEL J. UNCH, JR.,	*	
Defendant	*	


CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a true and certified copy of Affidavit Under §3301(d) of the Divorce Code filed in the above-captioned action was served on the following persons and in the following manner on the 10th day of February, 2004:

First-Class Mail, Postage Prepaid

John R. Ryan, Esquire  
BELIN & KUBISTA  
15 North Front Street  
P. O. Box 1  
Clearfield, PA 16830

Samuel J. Unch, Jr.  
709 Maxwell Street  
Clearfield, PA 16830

  
James A. Naddeo, Esquire  
Attorney for Plaintiff

Prothonotary/Clerk of Courts  
William A. Shaw

FEB 10 2004

FILED

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

PATRICIA B. UNCH,  
Plaintiff

VS.

SAMUEL J. UNCH, JR.,  
Defendant

: NO. 03 – 643 – C.D.

:  
: PRAECIPE FOR WITHDRAWAL  
: OF APPEARANCE

:  
: Filed on Behalf of:  
: Defendant, SAMUEL J.  
: UNCH, JR.

:  
: Counsel of Record for  
: This Party:

:  
: JOHN R. RYAN, ESQUIRE  
: Pa. I.D. #38739

:  
: BELIN & KUBISTA  
: 15 North Front Street  
: P.O. Box 1  
: Clearfield, PA 16830  
: (814) 765-8972

**FILED**

**FEB 12 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

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

PATRICIA B. UNCH,  
Plaintiff

VS.


NO. 03 - 643 - C.D.

SAMUEL J. UNCH, JR.,  
Defendant

**PRAECIPE FOR WITHDRAWAL OF APPEARANCE**

TO WILLIAM SHAW, PROTHONOTARY:

Pursuant to Order of Court dated January 2, 2004, please withdraw my appearance as  
counsel for Defendant, SAMUEL J. UNCH, JR., in the above-captioned action.

  
\_\_\_\_\_  
John R. Ryan Esquire

FILED 3cc  
01033381 My Ryan  
FEB 12 2004  
William A. Shaw  
Prothonotary/Clerk of Courts  
copy to CIA  
GWS

William A. Shaw  
Prothonotary/Clerk of Courts

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

**NOTICE OF INTENTION TO REQUEST ENTRY**  
**OF §3301(d) DIVORCE DECREE**

TO: Samuel J. Unch, Defendant

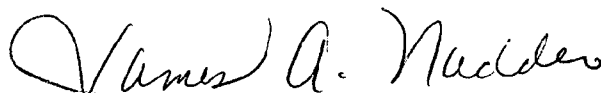
You have been sued in an action for divorce. You have failed to answer the complaint or file a counter-affidavit to the §3301(d) affidavit. Therefore, on or after April 8, 2004, the other party can request the court to enter a final decree in divorce.

If you do not file with the prothonotary of the court an answer with your signature notarized or verified or a counter-affidavit by the above date, the court can enter a final decree in divorce. A counter-affidavit which you may file with the prothonotary of the court is attached to this notice.

Unless you have already filed with the court a written claim for economic relief, you must do so by the above date or the court may grant the divorce and you will lose forever the right to ask for economic relief. The filing of the form counter-affidavit alone does not protect your economic claims.

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



James A. Naddeo, Esquire  
Attorney for Plaintiff

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

COUNTER-AFFIDAVIT UNDER SECTION 3301(d) OF THE DIVORCE CODE

1. Check either (a) or (b):

( ) I do not oppose the entry of a divorce decree.

( ) I oppose the entry of a divorce decree because

(Check (i), (ii) or both):

( ) (i) The parties to this action have not lived  
separate and apart for a period of at least two years.

( ) (ii) The marriage is not irretrievably broken.

2. Check either (a) or (b):

( ) (a) I do not wish to make any claims for economic relief. 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.

( ) (b) I wish to claim economic relief which may include alimony, division of property, lawyer's fees or expenses or other important rights.



I understand that in addition to checking (b) above, I must also file all of my economic claims with the Prothonotary in writing and serve them on the other party. If I fail to do so before the date set forth on the Notice of intention to Request Divorce Decree, the divorce decree may be entered without further delay.

I verify that the statements made in this counter-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.

Date: \_\_\_\_\_

\_\_\_\_\_  
Samuel J. Unch, Jr.

**NOTICE:** If you do not wish to oppose the entry of a divorce decree and you do not wish to make any claim for economic relief, you should not file this Counter-Affidavit.

FILED <sup>ice</sup>  
MAR 11 17 2004  
MAR 12 2004  
Atty Naddeo  
Kex

William A. Shaw  
Prothonotary/Clerk of Courts

William A. Shaw  
Prothonotary/Clerk of Courts

AFFIDAVIT

FEB 19 2004

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

Before me, the undersigned notary public, this day, personally, appeared

Louis P. Radzynski to me known, who being duly sworn according to

law, deposes the following:

Statement

Service of Process was performed by the Hand to Hand method on Tuesday, February 17, 2004 at 2:25 P.M.. It took place at 709 Maxwell St., Clearfield PA 16830 between myself and Samuel Unch Jr.

I swear the above to be true and correct.



\_\_\_\_\_  
Louis P. Radzynski

Subscribed and sworn before me this

day of

~~February~~

2.18.04

  
Notary Public  
WARD A. IRELAND

District Justice, State of Pennsylvania

No. 46-3-02, Clearfield County

Term Expires Jan. 3, 2006

FILED <sup>119</sup>cc  
0/10:46:04  
MAR 12 2004 ~~12:05~~

William A. Shaw  
Prothonotary/Clerk of Courts

William A. Shaw  
Prothonotary/Clerk of Courts

AFFIDAVIT

MAR 16 2004

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

Before me, the undersigned notary public, this day, personally, appeared

Louis P. Radzynski to me known, who being duly sworn according to

law, deposes the following:

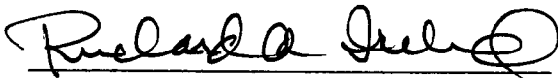
Statement

On Friday, March 12, 2004 at 5:00 PM I performed Service  
of Process by the Hand-toHand method on Samuel Unch Jr.,  
709 Maxwell St., Clearfield PA 16830.

I swear the above to be true and correct.

  
\_\_\_\_\_  
Louis P. Radzynski

Subscribed and sworn before me this 15 day of March, 2004



Notary

RICHARD A. IRELAND  
District Justice, State of Pennsylvania  
No. 46-3-02, Clearfield County  
Term Expires Jan. 3, 2006

FILED <sup>NO</sup>cc  
0/2:35~~24~~  
MAR 16 2004

*[Handwritten signature]*

William A. Shaw  
Prothonotary/Clerk of Courts





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

PATRICIA B. UNCH	*	
Plaintiff	*	
	*	
vs.	*	No. 03 - 643 - CD
	*	
SAMUEL J. UNCH, JR.,	*	
Defendant	*	

**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(d)(1) of the Divorce Code.

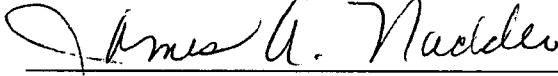
2. Date and manner of service of the Complaint: Acceptance of Service signed by counsel for Defendant on May 28, 2003.

3. Date of execution and filing of Affidavit Under §3301(d) of the Divorce Code: February 10, 2004.

4. Date and manner of service of Affidavit Under §3301(d) of the Divorce Code upon the Defendant: February 17, 2004, by Constable.

5. Related claims pending: Equitable property distribution.

6. Date and manner of service of Notice of Intention to Request Entry of §3301(d) Divorce Decree, a copy of which is attached: March 12, 2004, by Constable.

  
James A. Naddeo, Esquire  
Attorney for Plaintiff

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

No. 03 - 643 - CD

Type of Pleading:

NOTICE OF INTENTION TO  
REQUEST ENTRY OF §3301(d)  
DIVORCE DECREE

Filed on behalf of:

Plaintiff

Counsel of Record for  
this party:

James A. Naddeo, Esq.  
Pa I.D. 06820

211 1/2 E. Locust Street  
P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601

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

PATRICIA B. UNCH

Plaintiff

vs.

SAMUEL J. UNCH, JR.,

Defendant

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No. 03 - 643 - CD

NOTICE OF INTENTION TO REQUEST ENTRY  
OF §3301(d) DIVORCE DECREE

TO: Samuel J. Unch, Defendant

You have been sued in an action for divorce. You have failed to answer the complaint or file a counter-affidavit to the §3301(d) affidavit. Therefore, on or after April 8, 2004, the other party can request the court to enter a final decree in divorce.

If you do not file with the prothonotary of the court an answer with your signature notarized or verified or a counter-affidavit by the above date, the court can enter a final decree in divorce. A counter-affidavit which you may file with the prothonotary of the court is attached to this notice.

Unless you have already filed with the court a written claim for economic relief, you must do so by the above date or the court may grant the divorce and you will lose forever the right to ask for economic relief. The filing of the form counter-affidavit alone does not protect your economic claims.

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



James A. Naddeo, Esquire  
Attorney for Plaintiff

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

PATRICIA B. UNCH

Plaintiff

vs.

SAMUEL J. UNCH, JR.,

Defendant

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No. 03 - 643 - CD

COUNTER-AFFIDAVIT UNDER SECTION 3301(d) OF THE DIVORCE CODE

1. Check either (a) or (b):

( ) I do not oppose the entry of a divorce decree.

( ) I oppose the entry of a divorce decree because

(Check (i), (ii) or both):

( ) (i) The parties to this action have not lived  
separate and apart for a period of at least two years.

( ) (ii) The marriage is not irretrievably broken.

2. Check either (a) or (b):

( ) (a) I do not wish to make any claims for economic  
relief. 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.

( ) (b) I wish to claim economic relief which may include  
alimony, division of property, lawyer's fees or expenses or other  
important rights.

I understand that in addition to checking (b) above, I must also file all of my economic claims with the Prothonotary in writing and serve them on the other party. If I fail to do so before the date set forth on the Notice of intention to Request Divorce Decree, the divorce decree may be entered without further delay.

I verify that the statements made in this counter-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.

Date: \_\_\_\_\_

\_\_\_\_\_  
Samuel J. Unch, Jr.

**NOTICE:** If you do not wish to oppose the entry of a divorce decree and you do not wish to make any claim for economic relief, you should not file this Counter-Affidavit.

## VITAL RECORDS

COUNTY

Clearfield

## RECORD OF

DIVORCE OR ANNULMENT



(CHECK ONE)



STATE FILE NUMBER

STATE FILE DATE

## HUSBAND

1. NAME (First) (Middle) (Last) Samuel J. Unch, Jr.			2. DATE OF BIRTH (Month) (Day) (Year) 9 18 57		
3. RESIDENCE Street or R.D. City, Boro. or Twp. County State 709 Maxwell Street, Clearfield, PA 16830			4. PLACE OF BIRTH (State or Foreign Country) Clearfield, PA		
5. NUMBER OF THIS MARRIAGE 3		6. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		7. USUAL OCCUPATION Self-employed	

## WIFE

8. MAIDEN NAME (First) (Middle) (Last) Butler Patricia B. Unch			9. DATE OF BIRTH (Month) (Day) (Year) 4 28 57		
10. RESIDENCE Street or R.D. City, Boro. or Twp. County State 1107 Turnpike Avenue, Clearfield, PA 16830			11. PLACE OF BIRTH (State or Foreign Country) Clearfield, PA		
12. NUMBER OF THIS MARRIAGE 3		13. RACE WHITE <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		14. USUAL OCCUPATION RN	
15. PLACE OF THIS MARRIAGE (County) (State or Foreign Country) Clearfield, PA			16. DATE OF THIS MARRIAGE (Month) (Day) (Year) 7 1 97		
17A. NUMBER OF CHILDREN THIS MARRIAGE 1	17B. NUMBER OF DEPENDENT CHILDREN UNDER 18. 1	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 1		HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> SPLIT CUSTODY <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>		21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT 3301(d)	
22. DATE OF DECREE (Month) (Day) (Year)			23. DATE REPORT SENT TO VITAL RECORDS (Month) (Day) (Year)		

24. SIGNATURE OF  
TRANSCRIBING CLERK



FILED

APR 14 2004

010-41 a - m

William A. Shaw  
Prothonotary

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

\*  
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\*  
\* No. 03 - 643 - CD  
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\*  
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\*  
\* Type of Pleading:  
\*  
\*  
\* **DIVORCE DECREE**  
\*  
\* Filed on behalf of:  
\*  
\* Plaintiff  
\*  
\* Counsel of Record for  
\* this party:  
\*  
\* James A. Naddeo, Esq.  
\* Pa I.D. 06820  
\*  
\* 211 1/2 E. Locust Street  
\* P.O. Box 552  
\* Clearfield, PA 16830  
\* (814) 765-1601

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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

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No. 03 - 643 - CD

**DECREE**

AND NOW, this 16 day of April, 2004, it is  
ORDERED and DECREED that PATRICIA B. UNCH, Plaintiff, and SAMUEL  
J. UNCH, JR., Defendant, are divorced from the bonds of  
matrimony.

The Court retains jurisdiction over all economic  
issues raised by the parties to this action for which a final  
Order has not been entered.

BY THE COURT:

  
Judge

2 CC Decrees to Adly Naddo  
1 CC Decree to Def. - 709 Maxwell St., Clearfield, PA 16830

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

PATRICIA B. UNCH

Plaintiff

vs.

SAMUEL J. UNCH, JR.,

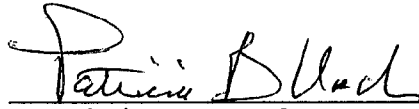
Defendant

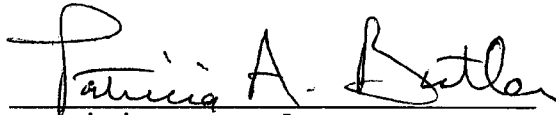
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\*

No. 03 - 643 - CD

NOTICE OF INTENT TO ASSUME MAIDEN NAME

The Plaintiff, Patricia B. Unch, hereby gives notice of her intent to assume her maiden name of Patricia A. Butler, having been divorced from the Defendant, Samuel J. Unch, Jr., by Order of Court dated April 16, 2004, and filed to the above captioned term and number.

  
Patricia B. Unch

  
Patricia A. Butler

Dated: May 14, 2004

**FILED**

MAY 17 2004

William A. Shaw  
Prothonotary

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

Patricia B. Unch  
Plaintiff

Vs.

Case No. 2003-00643-CD

Samuel J. Unch Jr.  
Defendant

**CERTIFICATE OF ELECTION TO RETAKE PRIOR NAME**

Notice is hereby given that a final Decree in divorce from the bonds of matrimony has been granted in the above captioned matter on April 16, 2004 and that Patricia B. Unch hereby elects to retake and hereafter use his/her prior name of Patricia A. Butler, and gives this written notice avowing his/her intention with the provisions of 54 Pa.C.S.A. Section 704.

s/ \_\_\_\_\_  
Patricia B. Unch

TO BE KNOWN AS:

s/ \_\_\_\_\_  
Patricia A. Butler

Certified from the record  
Monday, May 17, 2004

CLERK OF COURT  
CLEARFIELD COUNTY  
PENNSYLVANIA



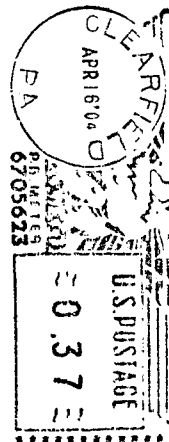
William A. Shaw, Prothonotary

WILLIAM A. SHAW  
PROTHONOTARY  
and CLERK of COURTS  
P.O. BOX 549  
CLEARFIELD, PENNSYLVANIA 16830

Samuel J. Unch, Jr.  
709 Maxwell St.  
Clearfield, PA 16830

FILED  
m/19:08  
JUN 28 2004

William A. Shaw  
Prothonotary/Clerk of Courts



☐ A ☐ C ☐ S  
☐ INSUFFICIENT ADDRESS  
☐ ATTEMPTED NOT KNOWN  
☐ NO SUCH NUMBER/STREET  
☐ NOT DELIVERABLE AS ADDRESSED  
☐ UNABLE TO FORWARD  
☐ OTHER

**RTS**  
RETURN TO SENDER

16830+1927 93

211 1/2 E. Locust Street  
P.O. Box 552  
Clearfield, PA 16830  
(814) 765-1601



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

PATRICIA B. UNCH  
Plaintiff

vs.

SAMUEL J. UNCH, JR.,  
Defendant

\*  
\*  
\*  
\*  
\*  
\*  
\*

No. 03 - 643 - CD

DECREE

AND NOW, this 16 day of April, 2004, it is  
ORDERED and DECREED that PATRICIA B. UNCH, Plaintiff, and SAMUEL  
J. UNCH, JR., Defendant, are divorced from the bonds of  
matrimony.

The Court retains jurisdiction over all economic  
issues raised by the parties to this action for which a final  
Order has not been entered.

BY THE COURT:

/s/ Fredric J. Ammerman

Judge

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

APR 16 2004

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts