

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

No. 03 - 1943 - CD

Type of Pleading:

COMPLAINT IN DIVORCE

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

One minor child:

Nathan P. Unch (d.o.b. 11/30/94) Age 8

FILED

APR 28 2003

William A. Shaw
Prehistoric

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

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

Judie Zimmerman
Judge

FILED

APR 29 2003

William A. Shaw
Prothonotary

FILED

CC
APR 23 2003
2003
Amy Nadeau

William A. Shaw
Prothonotary
C
REB

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. * No. 03 - - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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.



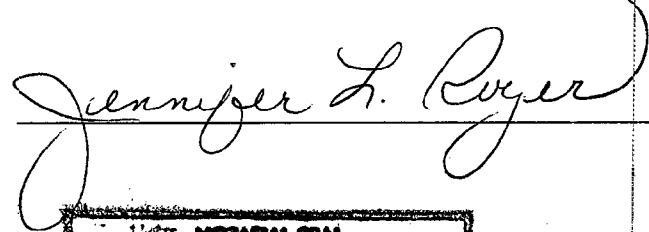
James A. Naddeo, Esquire
Attorney for Plaintiff

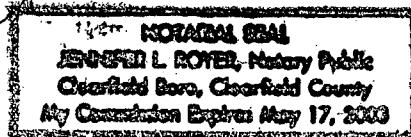
COMMONWEALTH OF PENNSYLVANIA)
ss.
COUNTY OF CLEARFIELD)

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.


Jennifer L. Royer



200 Atty Nadeau
341461 Atty pd 15.00
APR 28 1963

William A. Shew
Plaintiff

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

PATRICIA B. UNCH, : NO. 03 - 643 - C.D.
Plaintiff :
VS. : PRAECIPE FOR ENTRY
SAMUEL J. UNCH, JR., : OF APPEARANCE
Defendant :
: 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

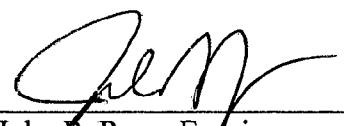
PATRICIA B. UNCH, :
Plaintiff :
:
VS. : NO. 03 - 643 - C.D.
:
SAMUEL J. UNCH, JR., :
Defendant :
:

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

MC
010:38.64 East

In The Court of Common Pleas of Clearfield County, Pennsylvania

UNCH, PATRICIA B.

VS.

UNCH, SAMUEL J. JR.

Sheriff Docket # 14082

03-643-CD

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
R.O. 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
by Marilyn Harris
Chester A. Hawkins
Sheriff

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

ASSOCIATE
LINDA C. LEWIS

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

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
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

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:

* COMPLAINT IN DIVORCE

* 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

One minor child:

Nathan P. Unch (d.o.b. 11/30/94) Age 8

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

APR 28 2003

Attest.

Wm. M. R.
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

*

*

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. Brown
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.

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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. * No. 03 - - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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.

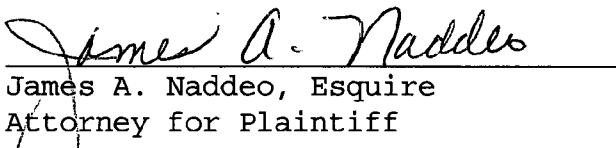
Plaintiff has no information of a custody proceeding concerning the child pending in a court of this Commonwealth.

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

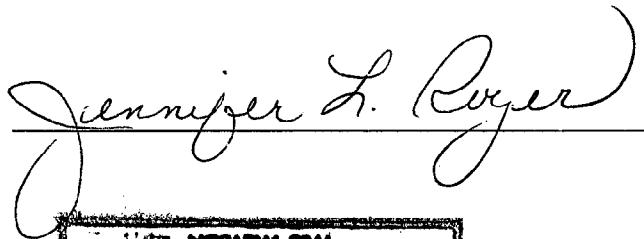
COMMONWEALTH OF PENNSYLVANIA)
ss.
COUNTY OF CLEARFIELD)

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.

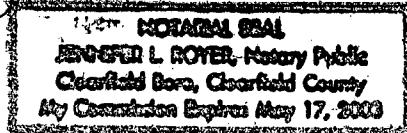


Patricia B. Unch

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



Jennifer L. Royer



200 Atty Madico
Atty pd. 15.00
APR 28 1953

William A. Shrum
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 - CD

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*
*
* Type of Pleading:
*
*
*
*
*
* **ACCEPTANCE OF SERVICE**
*
*
* 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

FILED

MAY 29 2003

William A. Shaw
Prothonotary

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 *

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

Chloro-
N^OCC
Sight
test

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;

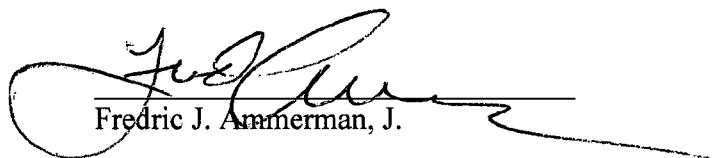
b. At such other times as the parties may agree.

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.

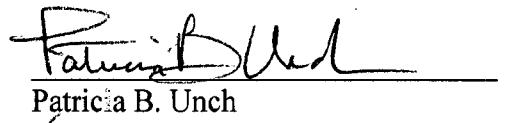
6. Both parties shall have reasonable telephone contact with the minor child when he is in the physical custody of the other party.

BY THE COURT:

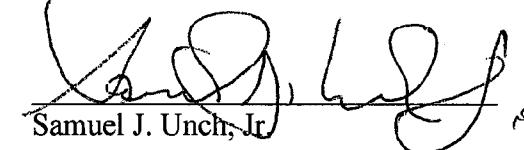


Fredric J. Ammerman, Jr.

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



Patricia B. Unch



Samuel J. Unch, Jr.

of Q. 43.81 ^{3CC} Aug Ryan
Sp

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

PATRICIA B. UNCH, : NO. 03 - 643 - C.D.
Plaintiff :
VS. : PETITION FOR LEAVE
: TO WITHDRAW
:
SAMUEL J. UNCH, JR., : Filed on Behalf of:
Defendant : 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. : NO. 03 - 643 - C.D.
:
SAMUEL J. UNCH, JR., :
Defendant :
:

RULE

AND NOW, this 8th 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:

Judie J. Zimmerman

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.

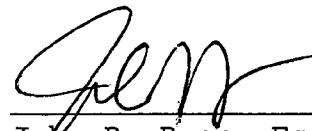
4. Under cover of letter dated August 21, 2003, counsel for Plaintiff forwarded a proposed Marriage Settlement Agreement for review.
5. Your Petitioner forwarded the proposed Agreement to Defendant by letter dated August 22, 2003, indicating that the Agreement was consistent with the discussions between 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



John R. Ryan, Esquire
Attorney for Defendant

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DEC 05 2003
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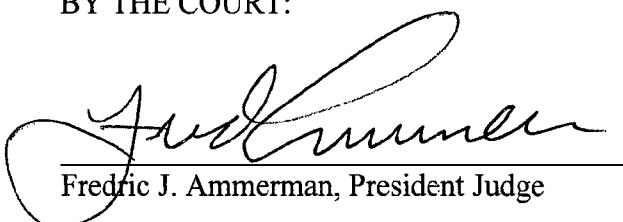
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

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

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
Fredric J. Ammerman, President Judge

FILED

JAN 06 2004

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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*

* Type of Pleading:

*
*

* **AFFIDAVIT UNDER §3301(d)
OF THE DIVORCE CODE**

*
*

* 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

FILED

FEB 10 2004

6/3/04

William A. Shaw

Prothonotary/Clerk of Courts

*2 Ltr to Atty S
101*

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 *

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 you 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
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.	*
	*
SAMUEL J. UNCH, JR.,	*
Defendant	*

No. 03 - 643 - CD

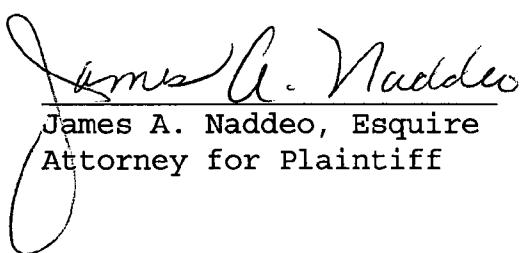
CERTIFICATE OF SERVICE

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

William A. Shaw
Prothonotary/Clerk of Courts

Feb 10 2004

FILED

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

PATRICIA B. UNCH, : NO. 03 – 643 – C.D.
Plaintiff :
VS. : PRAECIPE FOR WITHDRAWAL
: OF APPEARANCE
SAMUEL J. UNCH, JR., : Filed on Behalf of:
Defendant : 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

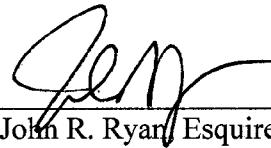
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

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 30C
FEB 12 2004
11C-3384
Amy Ryan
ccopy to CIA
William A. Straw
Prothonotary/Clerk of Courts
CIA

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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* Type of Pleading:

*
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* 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

FILED

MAR 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 - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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

TO: Samuel J. Unch, Defendant

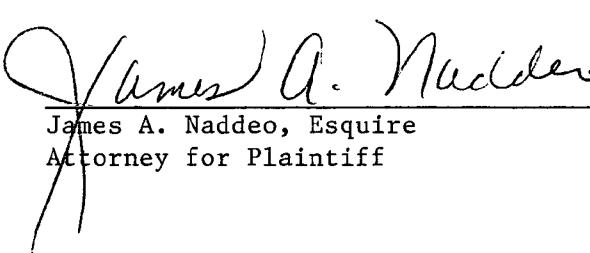
You have been sued in an action for divorce. You have failed to answer the complaint or file a counter-affidavit to the §3301(d) affidavit. Therefore, on or after April 8, 2004, the other party can request the court to enter a final decree in divorce.

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. * 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.

FILED *ice*
04/17/04 AM 1/2004 Addo
MAR 12 2004 Gex

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

* Type of Pleading:

* **AFFIDAVIT OF SERVICE**

* 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

FILED

MAR 12 2004

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. Radzyminski 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.

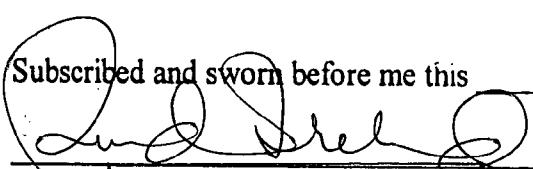
I swear the above to be true and correct.



Louis P. Radzyminski

Subscribed and sworn before me this

day of

 2.18.04

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

FILED
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01/10/04
MAR 12 2004
2004
FAX

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

* Type of Pleading:

* **AFFIDAVIT OF SERVICE**

* 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

FILED

MAR 16 2004

William A. Shaw
Prothonotary/Clerk of Courts

AFFIDAVIT

MAR 16 2004

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

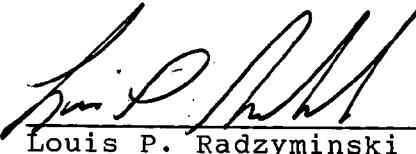
Before me, the undersigned notary public, this day, personally, appeared

Louis P. Radzyminski to me known, who being duly sworn according to
law, deposes the following:

Statement

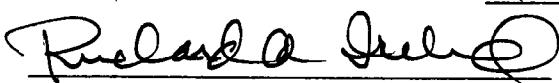
On Friday, March 12, 2004 at 5:00 PM I performed Service
of Process by the Hand-toHand method on Samuel Unch Jr.,
709 Maxwell St., Clearfield PA 16830.

I swear the above to be true and correct.



Louis P. Radzyminski

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
MAR 16 2004
10:35 AM
2004
Clerk
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

*
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*
*

* Type of Pleading:

*
*

* PRAECIPE TO TRANSMIT
* RECORD

*
*

* 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

FILED

APR 14 2004

William A. Shaw
Prothonotary

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
James A. Naddeo, Esquire
Attorney for Plaintiff

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

3/12/04
PATRICIA B. UNCH

Plaintiff

vs.

SAMUEL J. UNCH, JR.,

Defendant

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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. * No. 03 - 643 - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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
James A. Naddeo, Esquire
Attorney for Plaintiff

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.

RECORD OF

DIVORCE OR ANNULMENT

(CHECK ONE)

COUNTY
Clearfield

STATE FILE NUMBER

STATE FILE DATE

HUSBAND

1. NAME Samuel	(First) J.	(Middle) Unch,	(Last) Jr.	2. DATE OF BIRTH 9 18 57	
3. RESIDENCE 709 Maxwell Street, Clearfield, PA 16830	Street or R.D.	City, Boro. or Twp.	County	State	4. PLACE OF BIRTH Clearfield, PA
5. NUMBER OF THIS MARRIAGE 3	16. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	7. USUAL OCCUPATION Self-employed	

WIFE

8. MAIDEN NAME Butler	(First) Patricia	(Middle) B.	(Last) Unch	9. DATE OF BIRTH 4 28 57			
10. RESIDENCE 1107 Turnpike Avenue, Clearfield, PA 16830	Street or R.D.	City, Boro. or Twp.	County	State	11. PLACE OF BIRTH 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 Clearfield, PA	(County)			(State or Foreign Country)			
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

07/07/04 2-32
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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*
*

* 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

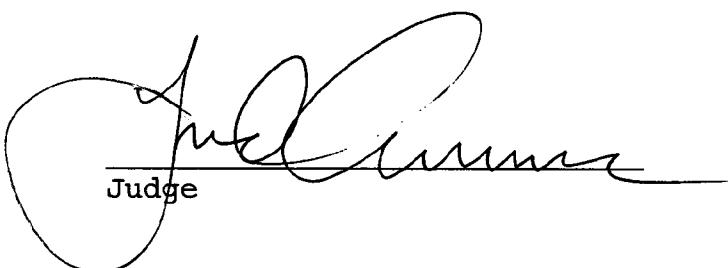
PATRICIA B. UNCH *
Plaintiff *
*
vs. * No. 03 - 643 - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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 Abby Nadeau
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. * NO. 03 - 643 - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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 B. Unch

Patricia A. Butler
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

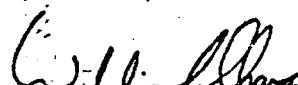
TO BE KNOWN AS:

s/ _____
Patricia A. Butler

Certified from the record
Monday, May 17, 2004

William A. Shaw, Prothonotary

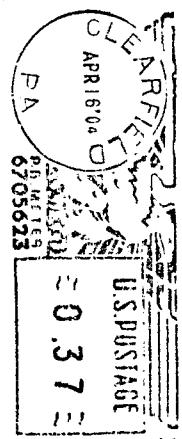
PROTHONOTARY
COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA



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

FILED
m 19:08 AM
JUN 28 2004

William A. Shaw
Prothonotary/Clerk of Courts



A
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INSUFFICIENT ADDRESS
ATTEMPTED NOT KNOWN
NO SUCH NUMBER/ STREET
NOT DELIVERABLE AS ADDRESSED
- UNABLE TO FORWARD

RTS
RETURN TO SENDER

1653943537 63

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

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* Type of Pleading:

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* 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. * No. 03 - 643 - CD
*
SAMUEL J. UNCH, JR., *
Defendant *

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 B. P.
Prothonotary/
Clerk of Courts