

04-1426-CD
LYNN A. MYERS, ETAL. VS. JERRY A. MILES, ETAL.

Lynn Myers et al vs Jerry Miles et al
2004-1426-CD

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426-C
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :
Type of Pleading: Complaint
Filed on behalf of: Lynn A. Myers
and Kathi J. Myers, Plaintiffs
Counsel of Record for this party:
HOPKINS HELTZEL LLP
DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519
LEA ANN HELTZEL, ESQUIRE
Attorney at Law
Supreme Court No. 83998
900 Beaver Drive
DuBois, Pennsylvania 15801
(814) 375-0300

FILED acc
1/300 (S)
SEP 15 2004 Atty Hopkins
2cc Shif

William A. Shaw
Prothonotary/Clerk of Courts
Atty pd. 85.00

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

LYNN A. MYERS and	:	
KATHI J. MYERS,	:	
	Plaintiffs	:
	:	
vs.	:	No.
	:	
JERRY A. MILES and	:	
JERRY A. MILES, JR.,	:	
	Defendants	:

NOTICE

TO DEFENDANT:

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by Attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
(814) 765-2641

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

LYNN A. MYERS and	:	
KATHI J. MYERS,	:	
	Plaintiffs	:
vs.	:	No.
	:	
JERRY A. MILES and	:	
JERRY A. MILES, JR.,	:	
	Defendants	:

COMPLAINT

NOW, comes the Plaintiffs, Lynn A. Myers and Kathi J. Myers, by and through their attorney's, Hopkins Heltzel LLP, and says as follows:

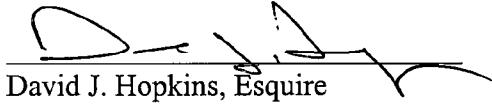
1. Plaintiffs, Lynn A. Myers and Kathi J. Myers, are husband and wife, who reside at 342 Kilmer Road, DuBois, Pennsylvania 15801.
2. Defendant Jerry A. Miles and Defendant Jerry A. Miles, Jr. are adult individuals who maintain a business address at Top of the Line Motors, Inc., 640 East Brady Street, DuBois, Pennsylvania 15801.
3. On or about March 27, 2004, Defendants executed a Promissory Note in the amount of \$16,500.00 in favor of the Plaintiffs. A photocopy of the Promissory Note is attached hereto as Exhibit "A" and the term thereof are incorporated as if set forth at length herein.
4. Under the terms of the Promissory Note, payment of the full \$16,500.00 was due on June 24, 2004.

5. Plaintiffs have demanded payment and Defendants have refused to make payment and therefore are in default of the Note.

6. Under the terms of the Promissory Note, in the event of a default and if the Promissory Note was placed with an attorney for collection, then the Defendants agreed to pay all reasonable attorney's fees and cost of collection. Plaintiffs believe that total cost of collection will be \$2,000.00.

WHEREFORE, Plaintiffs demand judgment in the amount of \$18,500.00 together with post judgment interest and such other and further relief as the Court deems fair, just and equitable.

Respectfully submitted,

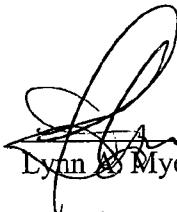


David J. Hopkins, Esquire
Attorney for Plaintiffs

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.

September 14, 2004


Lynn A. Myers

September 14, 2004


Kathi J. Myers

PROMISSORY NOTE

\$ 16,500.00

Dated: MARCH 27

, 2004 year)

Principal Amount

State of Pennsylvania

FOR VALUE RECEIVED, the undersigned hereby jointly and severally promise to pay to the order of *LYNN A. MYERS AND RATHI J. MYERS* *Rd 2 Box 65A, Dubois, PA 15801* the sum of *Sixteen Thousand Five Hundred Dollars and 00/100 Dollars (\$16,500.00)*, together with interest thereon at the rate of *-0-* % per annum on the unpaid balance. Said sum shall be paid in the manner following: *One; June 27, 2004*

All payments shall be first applied to interest and the balance to principal. This note may be prepaid, at any time, in whole or in part, without penalty. All prepayments shall be applied in reverse order of maturity.

This note shall at the option of any holder hereof be immediately due and payable upon the failure to make any payment due hereunder within *days of its due date.*

In the event this note shall be in default, and placed with an attorney for collection, then the undersigned agree to pay all reasonable attorney fees and costs of collection. Payments not made within five (5) days of due date shall be subject to a late charge of *%* of said payment. All payments hereunder shall be made to such address as may from time to time be designated by any holder hereof.

The undersigned and all other parties to this note, whether as endorsers, guarantors or sureties, agree to remain fully bound hereunder until this note shall be fully paid and waive demand, presentment and protest and all notices thereto and further agree to remain bound, notwithstanding any extension, renewal, modification, waiver, or other indulgence by any holder or upon the discharge or release of any obligor hereunder or to this note, or upon the exchange, substitution, or release of any collateral granted as security for this note. No modification or indulgence by any holder hereof shall be binding unless in writing; and any indulgence on any one occasion shall not be an indulgence for any other or future occasion. Any modification or change of terms, hereunder granted by any holder hereof, shall be valid and binding upon each of the undersigned, notwithstanding the acknowledgment of any of the undersigned, and each of the undersigned does hereby irrevocably grant to each of the others a power of attorney to enter into any such modification on their behalf. The rights of any holder hereof shall be cumulative and not necessarily successive. This note shall take effect as a sealed instrument and shall be construed, governed and enforced in accordance with the laws of the State first appearing at the head of this note. The undersigned hereby execute this note as principals and not as sureties.

TOP OF THE LINE MOTORS
640 South Brady Street
DU BOIS, PENNSYLVANIA 15801

Signed in the presence of:

Danielle R. Cessna

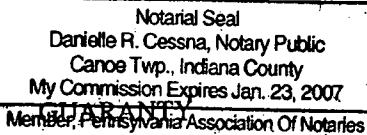
Witness

Danielle R. Cessna

Witness

John M. Murphy
Borrower

Jay A. Malen
Borrower



We the undersigned jointly and severally guaranty the prompt and punctual payment of all moneys due under the aforesaid note and agree to remain bound until fully paid.

In the presence of:

Witness

Guarantor

Witness

Guarantor

FILED

SEP 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

MYERS, LYNN A. & KATHI J.

VS.

MILES, JERRY A. & JERRY A. JR.

COMPLAINT

Sheriff Docket # 16295

04-1426-CD

SHERIFF RETURNS

NOW SEPTEMBER 20, 2004 AT 10:18 AM SERVED THE WITHIN COMPLAINT ON JERRY A. MILES, DEFENDANT AT EMPLOYMENT, 640 S. BRADY ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JERRY A. MILES A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

NOW SEPTEMBER 20, 2004 AT 10:18 AM SERVED THE WITHIN COMPLAINT ON JERRY A. MILES JR., DEFENDANT AT EMPLOYMENT, 640 S. BRADY ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JERRY A. MILES JR. A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

Return Costs

Cost	Description
38.62	SHERIFF HAWKINS PAID BY: ATTY CK# 14685
20.00	SURCHARGE PAID BY: ATTY CK# 14686

Sworn to Before Me This

23rd Day Of Sept 21 2004

William A. Shaw
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
by Marilyn Hause
Chester A. Hawkins
Sheriff

FILED
08/5/04
SEP 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426 C.D.
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :
:

PRAECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter judgment in favor of Plaintiffs, Lynn A. Myers and Kathi J. Myers and against Defendants Jerry A. Miles and Jerry A. Miles, Jr., for failure to file within the required time an answer to a Complaint which contained a Notice to Defend. Judgment should be in the amount set forth below:

Damages	\$18,500.00
Prothonotary Costs	85.00
Sheriff Fees	<u>58.62</u>
Total	\$18,643.62


David J. Hopkins, Esquire
Attorney for Plaintiffs

Att'y pd. 2000
10/22/04 Notice to Defs
EVR OCT 28 2004 Statement to Att'y

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426 C.D.
: :
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :
:

TO: Jerry A. Miles, Jr.
Top of the Line Motors, Inc.
640 East Brady Street
DuBois, PA 15801

DATE OF NOTICE: October 15, 2004

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS NOTICE TO A 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.

Office of the Court Administrator
Clearfield County Courthouse
Clearfield, Pennsylvania 16830
(814) 765-2641


DAVID J. HOPKINS, ESQUIRE
Attorney for Plaintiffs
Supreme Court No. 42519
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426 C.D.
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :

TO: Jerry A. Miles
Top of the Line Motors, Inc.
640 East Brady Street
DuBois, PA 15801

DATE OF NOTICE: October 15, 2004

IMPORTANT NOTICE

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Attorney for Plaintiffs
Supreme Court No. 42519
900 Beaver Drive
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(814) 375-0300

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426 C.D.
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :

JUDGMENT NOTICE

TO: Jerry A. Miles

Notice is given that a Judgment in the above captioned matter has been entered
against you in the amount of \$18,643.62.

10/28/04

Prothonotary

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426 C.D.
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :

JUDGMENT NOTICE

TO: Jerry A. Miles

Notice is given that a Judgment in the above captioned matter has been entered
against you in the amount of \$18,643.62.

10/28/04

Prothonotary

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

LYNN A. MYERS and :
KATHI J. MYERS, :
Plaintiffs :
vs. : No. 04-1426 C.D.
JERRY A. MILES and :
JERRY A. MILES, JR., :
Defendants :

JUDGMENT NOTICE

TO: Jerry A. Miles, Jr.

Notice is given that a Judgment in the above captioned matter has been entered
against you in the amount of \$18,643.62.

10/28/04

Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Lynn A. Myers
Kathi J. Myers
Plaintiff(s)

No.: 2004-01426-CD

Real Debt: \$18,643.62

Atty's Comm: \$

Vs.

Costs: \$

Jerry A. Miles
Jerry A. Miles Jr.
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 27, 2004

Expires: October 27, 2009

Certified from the record this 27th day of October, 2004.

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

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

Lynn A. Myers
Kathi J. Myers
Plaintiff(s)

No.: 2004-01426-CD

Real Debt: \$18,643.62

Atty's Comm:

Vs.

Costs: \$

Int. From:

Jerry A. Miles
Jerry A. Miles Jr.
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 28, 2004

Expires: October 28, 2009

Certified from the record this 28th day of October, 2004.

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

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

LYNN A. MYERS and	:	Case No. 04-1426-CD
KATHI J. MYERS,	:	
Plaintiffs	:	
	:	
V.	:	
	:	
JERRY A. MILES and JERRY A.	:	
MILES, JR. and TOP OF THE LINE	:	
MOTORS, INC.,	:	
Defendants	:	

**PRAECIPE TO DOCKET BANKRUPTCY
LIEN AVOIDANCE ORDER**

TO: The Prothonotary:

Kindly note at the above docket number the Bankruptcy Court Order dated April 6, 2005 avoiding the lien of Lynn A. Myers and Kathi J. Myers in this matter as it pertains to Jerry A. Miles, Jr. A copy of said Order is attached hereto.

Respectfully submitted,



Gary H. Simone, Esquire
RISHOR SIMONE
Suite 208, 101 E. Diamond Street
Butler, PA 16001
(724) 283-7215
PA I.D. #43955

100
FILED
11:32 AM
APR 25 2005
William A. Shaw
Prothonotary/Clerk of Courts

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

JERRY A. MILES, JR.	:	Bankruptcy No.: 04-34143 BM
Debtor,	:	
JERRY A. MILES, JR.	:	Chapter 7
Movant,	:	Document No.: 13
vs.	:	
CHARLES E. RITZIE, MARY F. RITZIE, a/k/a MARY FRANCES RITZIE, LYNN A. MYERS, KATHI J. MYERS, DONALD R. FEZELL, ROBERT J. KROELL, JOAN KROELL, TIMOTHY R. WELKER, MELISSA A. WELKER, NEIL R. WELKER, RHONDA L. JONES and JAMES R. WALSH, Chapter 7 Trustee	:	
Respondents	:	

Default
ORDER OF COURT

AND NOW this 6th day of April, 2005, upon due consideration of the
Debtor's Motion to Avoid Liens Impairing Debtor's Exemption,

IT IS HEREBY ORDERED:

Said Motion is granted. The following judgment liens entered in the Court of Common
Pleas of Clearfield County, Pennsylvania are hereby avoided in their entirety thereby canceling
said liens and releasing from same the Debtor's residential property located at 1425 Treasure
Lake, DuBois, Pennsylvania, 15801:

Charles E. Ritzie and Mary F.
Ritzie, a/k/a Mary Frances

October 27, 2004

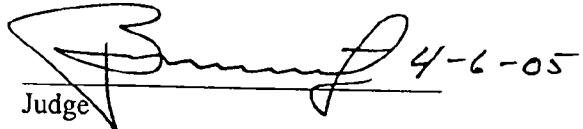
2004-1358 CD

\$50,150.00

Ritzie

Lynn A. Myers and Kathi J. Myers	October 28, 2004	2004-1426 CD \$18,643.62
Donald R. Fezell	October 27, 2004	2004-1433 CD \$48,500.00
Robert J. Kroell and Joan Kroell	October 18, 2004	2004-1374 CD \$55,000.00
Timothy R Welker, Melissa A. Welker and Neil R. Welker	August 26, 2004	2004-01326 CD \$60,500.00
Neil R. Welker and Timothy R. Welker	August 26, 2004	2004-03125 CD \$93,500.00
Rhonda L. Jones	October 24, 2004	2004-1357 CD \$16,700.00

By the Court,



4-6-05

Judge

FILED

APR 6 2005

CLERK, U.S. BANKRUPTCY COURT
WEST. DIST. OF PENNSYLVANIA

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LYNN A. MYERS and	:	Case No. 04-1426-CD
KATHI J. MYERS,	:	
Plaintiffs	:	
	:	
v.	:	
	:	
JERRY A. MILES and JERRY A.	:	
MILES, JR. and TOP OF THE LINE	:	
MOTORS, INC.,	:	
Defendants	:	

CERTIFICATE OF SERVICE

I, Gary H. Simone, Esquire, hereby certify that a true and correct copy of the Praeclipe to Docket Lien Avoidance was sent by United States Mail, postage prepaid, to the following:

David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801

Date: 4/19/05



Gary H. Simone, Esquire
RISHOR SIMONE
Suite 208, 101 E. Diamond
Butler, PA 16001
(724) 283-7215
PA I.D. 43955

FILED

APR 25 2005

William A. Shaw
Prothonotary/Clerk of Courts

FILED

APR 25 2005

William A. S. /
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LYNN A. MYERS and : Case No. 04-1426-CD
KATHI J. MYERS, :
Plaintiffs :
v. :
: :
JERRY A. MILES and JERRY A. :
MILES, JR. and TOP OF THE LINE :
MOTORS, INC., :
Defendants :
:

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I, Gary H. Simone, Esquire, hereby certify that a true and correct copy of the Praeclipe to Docket
Lien Avoidance was sent by United States Mail, postage prepaid, to the following:

David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801

Date: 4/19/06

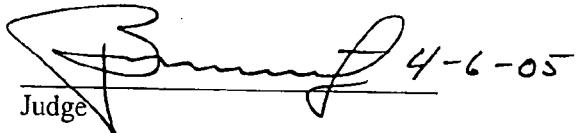


Gary H. Simone, Esquire
RISHOR SIMONE
Suite 208, 101 E. Diamond
Butler, PA 16001
(724) 283-7215
PA I.D. 43955

Ritzie

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Neil R. Welker and Timothy R. Welker	August 26, 2004	2004-03125 CD \$93,500.00
Rhonda L. Jones	October 24, 2004	2004-1357 CD \$16,700.00

By the Court,



4-6-05

Judge

FILED

APR 6 2005

CLERK, U.S. BANKRUPTCY COURT
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

JERRY A. MILES, JR.	:	Bankruptcy No.: 04-34143 BM
Debtor,	:	
JERRY A. MILES, JR.	:	Chapter 7
Movant,	:	Document No.: 13
vs.	:	
CHARLES E. RITZIE, MARY F. RITZIE, a/k/a MARY FRANCES RITZIE, LYNN A. MYERS, KATHI J. MYERS, DONALD R. FEZELL, ROBERT J. KROELL, JOAN KROELL, TIMOTHY R. WELKER, MELISSA A. WELKER, NEIL R. WELKER, RHONDA L. JONES and JAMES R. WALSH, Chapter 7 Trustee	:	
Respondents	:	

Default
ORDER OF COURT

AND NOW this 6th day of April, 2005, upon due consideration of the
Debtor's Motion to Avoid Liens Impairing Debtor's Exemption,

IT IS HEREBY ORDERED:

Said Motion is granted. The following judgment liens entered in the Court of Common
Pleas of Clearfield County, Pennsylvania are hereby avoided in their entirety thereby canceling
said liens and releasing from same the Debtor's residential property located at 1425 Treasure
Lake, DuBois, Pennsylvania, 15801:

Charles E. Ritzie and Mary F. Ritzie, a/k/a Mary Frances	October 27, 2004	2004-1358 CD
		\$50,150.00

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

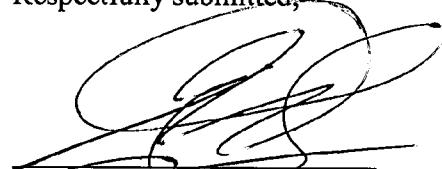
LYNN A. MYERS and : Case No. 04-1426-CD
KATHI J. MYERS, :
Plaintiffs :
v. :
: :
JERRY A. MILES and JERRY A. :
MILES, JR. and TOP OF THE LINE :
MOTORS, INC., :
Defendants :
:

**PRAECIPE TO DOCKET BANKRUPTCY
LIEN AVOIDANCE ORDER**

TO: The Prothonotary:

Kindly note at the above docket number the Bankruptcy Court Order dated April 6, 2005 avoiding the lien of Lynn A. Myers and Kathi J. Myers in this matter as it pertains to Jerry A. Miles, Sr. A copy of said Order is attached hereto.

Respectfully submitted,


Gary H. Simone, Esquire
RISHOR SIMONE
Suite 208, 101 E. Diamond Street
Butler, PA 16001
(724) 283-7215
PA I.D. #43955

Red
FILED NO
MAY 11 2005
APR 25 2005
William A. Shaw
Prothonotary/Clerk of Courts

04-1427-CD
BRUCE ALLEN GRAHAM
VS. APRIL GRAHAM

Bruce Graham vs April Graham
2004-1427-CD

Date: 7/13/2009

Clearfield County Court of Common Pleas

User: LMILLER

Time: 11:00 AM

Page 1 of 2

ROA Report

Case: 2004-01427-CD

Current Judge: Paul E. Cherry

Bruce Allen Graham vs .April Graham

Divorce with Custody

Date	Judge
9/15/2004	Filing: Divorce Complaint Additional Counts Paid by: Milgrub, Richard H. No Judge Receipt number: 1886562 Dated: 09/15/2004 Amount: \$10.00 (Check)
	✓ Filing: Divorce Complaint with Custody Count Paid by: Milgrub, Richard H. No Judge Receipt number 1886562 Dated: 09/15/2004 Amount: \$105.00 (Check) 1 Cert. to Atty.
9/17/2004	✓ Order Of Court, You, April Graham, Defendant, have been sued in Court to Paul E. Cherry obtain Custody of the children. You are ordered to appear in person the 11th day of October, 2004, at 1:30 p.m for a custody conference. Please report to the Court Administrator's office. If you fail to appear an Order for custody partial custody or visitation may be entered against you or the Court may issue a warrant for your arrest. BY THE COURT: /s/ Paul E. Cherry, Judge. 1 CC Atty Milgrub
9/22/2004	✓ Affidavit of Service filed on behalf of Plaintiff, Complaint in Divorce and Order Paul E. Cherry of Court scheduling a conference for October 11, 2004 at 1:30 p.m., served upon defendant by certified mail, as appears from receipt of certified mail attached hereto. Filed by s/ Richard H. Milgrub, Esquire. No CC.
10/11/2004	✓ Order, NOW, this 11th day of October, 2004, this being the date set for Paul E. Cherry Custody Conference and upon agreement of the parties, it is the ORDER of this Court as follows: (see original for details). BY THE COURT, /s/ Paul E. Cherry, Judge. We the undersigned, hereby consent to the entry of the above addendum. Bruce Allen Graham, April Graham, and Richard H. Milgrub, Esquire. 3CC Atty Milgrub (will serve Defendant).
3/10/2005	✓ Praeclipe to Transmit Record, filed by s/Richard H. Milgrub, Esq. No CC Paul E. Cherry ✓ Property Settlement Agreement, filed. s/Bruce Allen Graham s/April Graham Two CC Attorney Milgrub
3/14/2005	✓ Divorce Decree/Dated: March 14, 2005. BY THE COURT: /s/Paul E. Cherry Paul E. Cherry Judge March 31, 2005, Vital Statistics information reported to New Castle, PA. Two CC Decrees to Attorney Milgrub
5/2/2005	✓ Petition For Modification, filed by s/ Richard H. Milgrub, Esquire. 1CC Atty. Paul E. Cherry Milgrub
5/6/2005	✓ Praeclipe to Withdraw Petition for Modification, filed by Atty. Milgrub no cert. copies Paul E. Cherry
5/7/2005	✓ Petition for Modification, filed by Atty. Milgrub 1 Cert. to Atty. Paul E. Cherry
5/13/2005	✓ Rule, NOW, this 12th day of Sept., 2005, upon consideration of the Plaintiff: Paul E. Cherry Petition for Modification of Visitation Order, Ordered that the Rule be issued upon Defendant to show cause why the current Order should not be modified. Rule returnable by hearing the 5th day of October, 2005 at 9:00 a.m. By The Court, /s/ Paul E. Cherry, Judge. 2CC Atty. Milgrub
5/14/2005	✓ Petition For Continuance, filed by s/ Richard H. Milgrub, Esquire. 1CC atty Paul E. Cherry
5/16/2005	✓ Order, NOW, this 15th day of Sept., 2005, upon consideration of the Petitioner's Petition for Continuance, Ordered that the hearing for Modification of Visitation Order is continued until the 28th day of October, 2005 at 2:30 p.m. in Courtroom No 2. By The Court, /s/ Paul E. Cherry, Judge. 1CC Atty. Milgrub

List of Jurors for Criminal Court
Scheduled for Monday, April 20, 2009 at 8:45AM in Court Room 1

Number of Jurors Selected 265

Session # 10

Address Line 1

Address Line 2

Address Line 3

DUBOIS, PA 15801

KARPATHAUS, PA 16845

CURWENSVILLE, PA 16833

DUBOIS PA 15801

CLEARFIELD PA 16830

GRASSFLAT PA 16839

PHILIPSBURG PA 16866

CLEARFIELD PA 16830

DUBOIS PA 15801

CURWENSVILLE PA 16833

REYNOLDSVILLE PA 15805

MORRISDALE PA 16888

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1320 TURNPIKE AVE

11 CEMETARY RD

1724 NELSON, MARTHA A

2319 WHIPPERS RD

19 LORD ST

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20 BOX 162

Date: 7/13/2009

Clearfield County Court of Common Pleas

User: LMILLER

Time: 11:00 AM

Page 2 of 2

ROA Report

Case: 2004-01427-CD

Current Judge: Paul E. Cherry

Bruce Allen Graham vs .April Graham

Divorce with Custody

Date	Judge
9/28/2005	Affidavit of service, filed. That Plaintiff's Petition for Modification and Order was served upon April Graham on September 26, 2005 filed by s/ Richard H. Milgrub Esq. No CC. Paul E. Cherry
11/2/2005	✓ Order, NOW, this 28th day of Oct., 2005, following hearing on Petition for Modification, said Petition is granted. (see original for custody details). By The Court, /s/ Paul E. Cherry, Judge. 2CC Atty. Milgrub, 2CC Def. Paul E. Cherry
3/31/2009	✓ Petition to Modify Custody, filed by s/ Richard H. Milgrub, Esquire. 1CC Atty. Milgrub Paul E. Cherry
	✓ Petition for Contempt, filed by s/ Richard H. Milgrub, Esquire. 1CC Atty. Milgrub Paul E. Cherry
4/1/2009	✓ Order AND NOW, this 31st day of March 2009, it is hereby ORDERED And DIRECTED that hearing on said Petition be scheduled for the 5th day of Jur 2009 a.m. in Courtroom No. 2. 1 hour(s) has/have bee allotted for said hearing. BY THE COURT: /s/ Paul E. Cherry, Judge. 1CC Atty Milgrub. Paul E. Cherry
4/3/2009	✓ Order of Court, YOU, April Graham have been sued in Court to obtain custody and you are ordered to appear in person the 21st day of April 2009 at 10:30 a.m. for a custody conference. BY THE COURT: /s/ Paul E. Cherry Judge. 1CC Atty Milgrub. Paul E. Cherry
4/14/2009	✓ Affidavit of Service filed. That a certified copy of the Petition for Modification of Order and Order of Court scheduling a Custody Conference along with a certified copy of a Petition for Comtempt and Order scheduling hearing was served upon the defendant by certified mail, return receipt requested on Apr 13, 2009, filed by s/ Richard H. Milgrub Esq NO CC. Paul E. Cherry
4/21/2009	✓ Order, NOW, this 21st day of April 2009 following custody conference and upon agreement of the parties, it is hereby ORDERED as follows: (SEE ORIGINAL FOR DETAILS) BY THE COURT: /S/ Paul E. Cherry, Judge. cer to Milgrub and deft. Paul E. Cherry
4/22/2009	✓ Praecipe to Withdraw Petition for Contempt, filed by s/ Richard H. Milgrub, Esquire. 1CC Atty. Milgrub Paul E. Cherry
4/27/2009	✓ Returned mail, Order, dated April 21, 2009 to April Graham, remailed to 306 Paul E. Cherry South Penn Street, Punxsutawney, PA 15767
6/2/2009	✓ Petition for Modification of Custody Consent Order, filed by s/ Richard H. Milgrub, Esquire. 1CC Atty. Milgrub Paul E. Cherry
6/3/2009	✓ Order, this 3rd day of June, 2009, the hearing on Plff's Petition for Modification of Custody Consent Order is scheduled for the 9th of July, 2009 at 2:15 p.m. in Courtroom 2. 1 hour has been allotted for said hearing. By The Court, /s/ Paul E. Cherry, Judge. 1CC Atty. Milgrub Paul E. Cherry
6/17/2009	✓ Affidavit of Service filed. That a certified copy of the Petition for Modification of Custody Consent Order and Order scheduling hearing was served upon the Defendant by certified mail, return receipt requested on June 15, 2009, filed by s/ Richard H. Milgrub Esq. No CC. Paul E. Cherry

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

BRUCE ALLEN GRAHAM,

Plaintiff *

- vs -

* No. 2004-1427-C0

APRIL GRAHAM,

Defendant *

Type of Action:
Divorce

Type of Pleading:
Complaint

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

THERE ARE TWO CHILDREN
BORN OF THIS MARRIAGE:
Michelle Graham, born
10/18/93, age 10; and
Katlyn Graham, born
11/30/95, age 8

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 15 2004

012401

William A. Shaw
Prothonotary

1 copy to ATR

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
- VS - * No.
*
APRIL GRAHAM, *
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 (Child)	<input checked="" type="checkbox"/> Custody
<input checked="" type="checkbox"/> Division of Property	<input type="checkbox"/> Visitation
<input type="checkbox"/> Temporary Alimony	<input type="checkbox"/> Alimony
<input type="checkbox"/> Costs	<input type="checkbox"/> Attorney Fees

If you wish to defend against the claim set forth in the following pages, you must take prompt action. You are warned that if you fail to do so, the case may proceed without you and a decree of divorce or annulment may be entered against you by the Court. A judgment may also be entered against you for any other claim or relief requested in these papers by the Plaintiff. You may lose money or property or other rights important to you, including custody or visitation of your children.

When the ground for the divorce is indignities or irretrievable breakdown of the marriage, you may request marriage counseling. A list of marriage counselors is available in the Office of the Prothonotary of Clearfield County, 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. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Second and Market Streets
Clearfield, PA 16830
(814) 765-2641

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
- VS - * No.
*
APRIL GRAHAM, *
Defendant *

COMPLAINT

AND NOW, comes the Plaintiff, Bruce Allen Graham, by and through his attorney, Richard H. Milgrub, Esquire, and files the following Complaint in Divorce:

1. Plaintiff is Bruce Allen Graham, an adult individual, who currently resides at 36 Oak Ridge Road, Madera, Pennsylvania.
2. Defendant is April Graham, an adult individual, who currently resides at 406 East Bridge Street, Westover, Pennsylvania.
3. Plaintiff and Defendant have been bona fide residents of the Commonwealth of Pennsylvania for at least six months (6) immediately previous to the filing of this Complaint.
4. Plaintiff and Defendant were married on July 10, 1993 at the United Methodist Church in Glen Hope, Pennsylvania.
5. There have been no prior actions for divorce or annulment between the parties.
6. Plaintiff avers that he is entitled to a divorce on the ground that the marriage is irretrievably broken. Also,

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

at the appropriate time, Plaintiff may submit an Affidavit alleging that the parties have lived separate and apart for at least two (2) years.

7. That the Plaintiff has been advised of the availability of counseling and furthermore, the Plaintiff has been advised of the right to request that the Court require the parties to participate in counseling.

8. This action is not collusive.

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

Count II - Equitable Distribution

9. Paragraphs 1 through 4 of this Complaint are incorporated herein by reference 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 10, 1993 until August 20, 2004, the date of their separation, all of which property is "marital property".

11. Plaintiff and Defendant have acquired, prior to their marriage or subsequent thereto, "non-marital property" which has increased in value since the date of the marriage and/or subsequent to its acquisition during the marriage, which increase in value is "marital property".

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109 NORTH BRADY STREET
DUBOIS, PA 15801

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

WHEREFORE, Plaintiff requests the Court to equitably divide all marital property and to enjoin it from being removed, disposed of, alienated, sold or otherwise encumbered pending final hearing and settlement of all claims.

Count III - Custody

13. Paragraphs 1 through 4 of this Complaint are incorporated herein by reference as though set forth in full.

14. Plaintiff and Defendant are the parents of the following children: Michelle Graham, born October 18, 1993; and Katlyn Graham, born November 30, 1995.

15. For the past month, the parties' children have resided with the following persons and at the following addresses: With Defendant and Defendant's brother, Joseph Mann, and Defendant's boyfriend, John (last name unknown) at 406 East Bridge Street, Westover, Pennsylvania. For five years (5) prior to that date, the minor children were living with Plaintiff at 36 Oak Ridge Road, Madera, Pennsylvania.

The mother of the children is April Graham. She is married.

The father of the children is Bruce Allen Graham. He is married.

16. The relationship of Plaintiff to the children is that of father. The Plaintiff currently resides alone.

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CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

17. The relationship of Defendant to the children is that of mother. The Defendant currently resides with the minor children, Joseph Mann (Defendant's brother) and John (last name unknown) (Defendant's boyfriend).

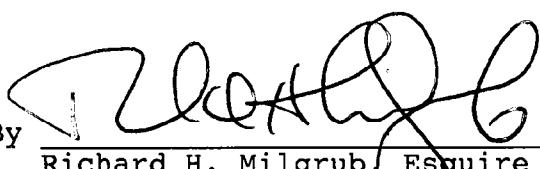
18. Plaintiff has not participated as a party, witness, or in any other capacity in any other litigation concerning the custody of the same children in this or any other state.

19. Plaintiff has no information of any custody proceeding concerning the children pending in this or any other state.

20. Plaintiff does not know of any persons not a party to the proceedings who has physical custody of the children or claims to have custody or visitation rights with respect to the children.

21. Plaintiff believes the best interest and welfare of the children will be served by awarding joint legal and physical custody the minor children to Plaintiff and Defendant.

WHEREFORE, Plaintiff requests the Court to grant Plaintiff custody as requested herein.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

I, Bruce Allen Graham , verify that the statements made in the Complaint 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: 9/13/04

* Bruce Allen Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 15 2004

William A. Shaw
Prothonotary

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
- VS - * No. 2004-1427-CR
*
APRIL GRAHAM, *
Defendant *

ORDER OF COURT

YOU, April Graham, Defendant, have been sued in Court to obtain Custody of the children: Michelle Graham and Katlyn Graham.

October You are ordered to appear in person the 11 day of October, 2004 at 1:30 P.M. for a Custody Conference. Please report to the Court Administrator's Office, 2nd Floor, Clearfield County Courthouse, Clearfield, Pennsylvania. 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. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

BY THE COURT:

Date:

September 17, 2004 *Paul E. Cherry*
Judge

FILED E6K

0 11:22 AM 100 City/Melquist

SEP 17 2004

William A. Shaw
Prothonotary

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

AMERICANS 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

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs-

* No. 2004-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

*

Type of Pleading:
Affidavit of Service

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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FILED NO C
09/24/2004
SEP 22 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

*
*
*

-vs-

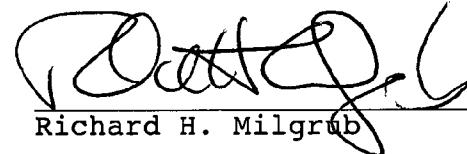
* No. 2004-1427-CD

APRIL GRAHAM,
Defendant

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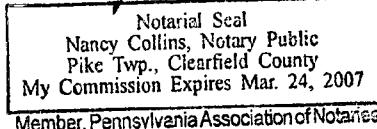
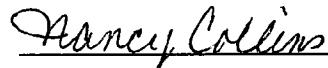
AFFIDAVIT OF SERVICE

Richard H. Milgrub, attorney for the above-named Plaintiff, being duly sworn according to law, deposes and states that Plaintiff's Complaint in Divorce and Order of Court scheduling a conference for October 11, 2004 at 1:30 p.m. was served upon the Defendant, April Graham, by certified mail, return receipt requested on September 20, 2004, at the Defendant's residence of 406 East Bridge Street, Westover, Pennsylvania 16692, as appears from receipt of certified mail attached hereto.



Richard H. Milgrub

SWORN and SUBSCRIBED to before me this 22nd day of September 2004.



THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

April Graham
406 East Bridge Street
Westover, PA 16692

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

April Graham

Agent
 Addressee

B. Received by (Printed Name)

April Graham

C. Date of Delivery
20 SEP 2004

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number

(Transfer from service label)

7003 1680 0005 6737 6054

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- **Sender:** Please print your name, address, and ZIP+4 in this box

Richard H. Milgrub
211 N. 2nd Street
Clearfield, PA 16830

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

BRUCE ALLEN GRAHAM

:

-vs-

: No. 04-1427-CD

APRIL GRAHAM

:

264
FILED 3CC

02-3284 Atty
OCT 11 2004 Migrab
(will serve
William A. Shaw, Def)
Prothonotary/Clerk of Courts

O R D E R

NOW, this 11th day of October, 2004, this being the date set for Custody Conference and upon agreement of the parties, it is the ORDER of this Court as follows:

1. The parties shall have joint and shared legal custody of their minor children, Michelle Graham (D.O.B. 10-18-93) and Katlyn Graham (D.O.B. 11-30-95). Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this Order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians, dentists, mental health providers and

teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Primary physical custody of the children shall be with the mother, subject to periods of partial custody in the father as follows:

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

B. A seven (7) day consecutive period during the summer months upon giving mother at least one (1) weeks notice;

C. In even-numbered years, father shall have the children from 9:00 a.m. until 2:00 p.m. on Thanksgiving and in odd-numbered years from 2:00 p.m. until 8:00 p.m.;

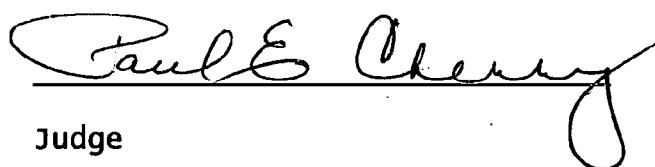
D. In even-numbered years, father shall have the children on Christmas Eve from 6:00 p.m. until Christmas Day at noon. In odd-numbered years, father shall have the children on Christmas Day from noon until 8:00 p.m.

E. The following holidays shall be alternated between the parties: Memorial Day, July 4th and Labor Day. Said schedule shall commence with father having the minor children on Memorial Day 2005;

F. The party initiating physical custody shall be responsible for transportation;

- G. Any and all times as the parties may agree.
3. Father shall be entitled to reasonable telephone communication with the minor children;
4. It is specifically understood that either party may petition the Court for modification of this order.

BY THE COURT,



Judge

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

Bruce Graham

BRUCE ALLEN GRAHAM
Plaintiff

April Graham

APRIL GRAHAM
Defendant

Attorney for Plaintiff

2004-01-11 10:54:20

00112004

1100

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

SRUCE ALLEN GRAHAM,
Plaintiff

- VS -

APRIL GRAHAM,
Defendant

*
*
*
*
*
*
*

* No. 04-1427-CD

Type of Action:
Divorce

Type of Pleading:
Praecipe to Transmit
the Record

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

1/3/13
NO
cc
FBI
MAR 10 2005
FBI - Pittsburgh
Preliminary, C.R. v. G. Coates

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
- vs - * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

PRAECIPE TO TRANSMIT RECORD

TO THE PROTHONOTARY:

Dear Sir:

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

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

2. Date and manner of service of the Complaint:

Served on the Defendant by certified mail, restricted delivery, return receipt requested on October 11, 2004.

3. Date of execution of the Affidavit of Consent required by Section 3301(c) of the Divorce Code: By Plaintiff on March 8, 2005 and by Defendant on March 8, 2005.

4. Date of execution of the Waiver of Notice required by Section 3301(c) of the Divorce Code: By Plaintiff on March 8, 2005 and by Defendant on March 8, 2005.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM,

*

Plaintiff

*

*

-vs-

* No. 2004-1427-CD

APRIL GRAHAM,

*

Defendant

*

AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under Section 3301(c) of the
Divorce Code was filed on September 15, 2004.

2. The marriage of Plaintiff and Defendant is irretrievably
broken. Ninety days have elapsed since the filing of the
Complaint.

3. Plaintiff consents to the entry of a Final Decree of
Divorce.

4. I understand that if a claim for alimony pendente lite,
marital property or counsel fees or expenses has not been filed
with the Court before the entry of a Final Decree in Divorce, the
right to claim any of them will be lost.

The party whose signature appears below verifies that the
statements made in this Affidavit are true and correct, and that
they are made subject to the penalties of 18 Pa.C.S. 4909 relating
to unsworn falsification to authorities.

THE LAW OFFICES OF
RICHARD H. MILGRUB

211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

Date: 3-8-05

+ Bruce Allen Graham

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

BRUCE ALLEN GRAHAM,
Plaintiff

*
*
*

-vs-

* No. 2004-1427-CD

APRIL GRAHAM,
Defendant

*

AFFIDAVIT OF CONSENT

1. A Complaint in Divorce under Section 3301(c) of the
Divorce Code was filed on September 15, 2004.

2. The marriage of Plaintiff and Defendant is irretrievably
broken. Ninety days have elapsed since the filing of the
Complaint.

3. Plaintiff consents to the entry of a Final Decree of
Divorce.

4. I understand that if a claim for alimony pendente lite,
marital property or counsel fees or expenses has not been filed
with the Court before the entry of a Final Decree in Divorce, the
right to claim any of them will be lost.

The party whose signature appears below verifies that the
statements made in this Affidavit are true and correct, and that
they are made subject to the penalties of 18 Pa.C.S. 4909 relating
to unsworn falsification to authorities.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

Date: 3-8-05



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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs-

*

No. 2004-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

*

WAIVER OF NOTICE OF INTENTION
TO REQUEST ENTRY OF A DIVORCE DECREE
UNDER SECTION 3301(C) OF THE DIVORCE CODE

1. I consent to the entry of a final decree in divorce without notice.
2. I understand that I may lose rights concerning alimony, division of property, lawyer's fees or expenses if I do not claim them before a divorce is granted.
3. I understand that I will not be divorced until a divorce decree is entered by the Court and that a copy of the decree will be sent to me immediately after it is filed with the Prothonotary.

I verify that the statements made in this affidavit are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities.

Date: 3-8-05

Bruce Allen Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM,

Plaintiff

*

*

*

-vs-

*

No. 2004-1427-CD

*

*

*

APRIL GRAHAM,

Defendant

*

*

WAIVER OF NOTICE OF INTENTION
TO REQUEST ENTRY OF A DIVORCE DECREE
UNDER SECTION 3301(C) OF THE DIVORCE CODE

1. I consent to the entry of a final decree in divorce without notice.

2. I understand that I may lose rights concerning alimony, division of property, lawyer's fees or expenses if I do not claim them before a divorce is granted.

3. I understand that I will not be divorced until a divorce decree is entered by the Court and that a copy of the decree will be sent to me immediately after it is filed with the Prothonotary.

I verify that the statements made in this affidavit are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities.

Date: 3-8-05



THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
- VS - * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

O R D E R

AND NOW, this 14th day of March, 2005, the Plaintiff having filed a Complaint in Divorce under the Divorce Act on the 15th day of September, 2005, and the parties having filed Affidavits of Consent stating that the marriage of the Plaintiff and Defendant is irretrievably broken and ninety days (90) have elapsed from the date of the filing of the Complaint,

IT IS THEREFORE DECREED that BRUCE ALLEN GRAHAM be divorced and forever separated from the nuptial ties and bonds of matrimony hereto contracted between himself and APRIL GRAHAM thereupon all of the rights, duties or claims accruing to either of said parties and pursuance of said marriage shall cease and determine and each of them shall be at liberty to marry again as though they had never been heretofore married with full force and recognition being given to the Property Settlement Agreement dated March 7, 2005, which is attached hereto and incorporated by reference as though set forth in full.

BY THE COURT:

(As/ Paul B. Cherry)

Judge

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
- vs - * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *
*

PROPERTY SETTLEMENT AGREEMENT

THIS AGREEMENT made this 7th day of March,
2004, by and between BRUCE ALLEN GRAHAM, who currently resides at
36 Oakridge Road, Madera, Pennsylvania, hereinafter referred to
as "Husband";

A
N
D

APRIL GRAHAM, who currently resides at 406 East Bridge Street,
Westover, Pennsylvania, hereinafter referred to as "Wife".

W I T N E S S E T H

WHEREAS, the parties hereto were married on
July 10, 1993 in Glen Hope, Pennsylvania; and

WHEREAS, two (2) children were born to the marriage,
namely, Michelle Graham, born 10/18/93, and Katlyn Graham, born
11/30/95; and

WHEREAS, the parties have been living separate and
apart for a period of time prior to the execution of this
agreement; and

cc
03/13/04 Atty Milgrub
Bd
by
Clerk of Courts
Prothonotary, Clerk of Courts

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RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

WHEREAS, the parties desire to settle their property rights permanently and for all time; and

WHEREAS, both parties agree to relinquish any and all claims which either may have against any property now owned or belonging to the other or which may hereafter be acquired by either of them by purchase, gift, devise, bequest, inheritance and otherwise, except as to the obligations, covenants and agreements contained herein; and

WHEREAS, the parties hereto have each had the benefit of competent and independent legal advice by separate counsel.

NOW THEREFORE, the parties intending to be legally bound hereby do covenant and agree:

1. Separation: It shall be lawful for each party at all times hereafter to live separate and apart from the other party at such place as he or she may from time to time choose or deem fit. The foregoing provisions shall not be taken as an admission on the part of either party of the lawfulness or unlawfulness of the causes leading to their living apart.

2. Interference: Each party shall be free from interference, authority, and contact by the other, as fully as if he or she were single and unmarried except as may be necessary to carry out the provisions of this Agreement. Neither party shall molest the other or attempt to endeavor to molest the other, nor compel the other to cohabit with the other, or in any way harass or malign the other, nor in any way interfere with the peaceful existence, separate and apart from the other, and each of the

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parties hereto completely understand and agree that neither shall do or say anything to the children of the parties at any time which might in any way influence the children adversely against the other party.

3. Desire of the Parties: It is the desire of the parties, after long and careful consideration, to amicably adjust, compromise and settle all property rights and all rights in, to or against each other's property or estate, including any and all claims for Wife's and/or Husband's maintenance and/or for support, alimony, counsel fees and costs, custody and equitable distribution.

4. Debts: Husband and Wife represent and warrant to each other that neither one has contracted any debt or debts, charges or liabilities whatsoever, for which the other party or their property or their estates shall or may be or become liable or answerable, and they covenant that they will at all times keep each other free, harmless and indemnified against and from any and all debts and liabilities heretofore or hereafter contracted or incurred by either of them, except as expressly provided in this agreement.

5. Mutual Release: Subject to the provisions of this Agreement, each party has released and discharged, and by this Agreement does for himself or herself and his or her heirs, legal representatives, executors, administrators and assigns, release and discharge the other of and from all causes of action, claims, rights, or demands, whatsoever in law or equity, which either of

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the parties ever had or now has against the other, except any or all cause or causes of action for divorce and except any or all causes of action for breach of any provisions of this Agreement.

6. Checking and Savings Accounts: The parties agree that there are no checking or savings accounts in the name of Husband and Wife and that each has their own separate such accounts with respect to which the other will make no claim.

7. Division of Personal Property: All items of personal property have been divided satisfactorily by the parties and neither shall make any claim to any such property presently in the possession of the other.

8. Division of Real Estate: Husband shall become sole owner and Wife will convey all of her interest in the parties' marital residence located at 36 Oakridge Road, Madera, Pennsylvania, to Husband and Husband will assume all mortgage payments on said property and shall hold Wife harmless to a County National Bank Loan Account No. 00089304550 00003.

Should at any time, it become necessary for either party to execute any titles, deeds or similar documents to give effect to this paragraph, it shall be done immediately upon request of the other party.

9. Christmas Club: The parties shall divide the balance in the year's Christmas Club (2004) which presently has a value of \$511.29.

10. Vehicles: Husband shall convey all interest in a 2001 Ford Escort to Wife but will continue making all payments on

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said Ford Escort until the vehicle is paid in full and will then sign any and all necessary documents conveying title to Wife.

Wife shall convey all interest in a 1988 Chevrolet Beretta to Husband and will sign any and all necessary documents conveying title to Husband.

11. Counsel Fees: Each party shall be responsible for his or her own counsel fees.

12. Custody: The custody of the minor children has already been determined by a Court Order dated October 11, 2004, a copy of said Order is attached to this Agreement.

13. Child Support: Husband hereby agrees to pay to Wife \$65.00 per week for each minor child. It is specifically understood that either party has the option to go into court and ask for a modification of this amount.

14. Advice of Counsel: Both Husband and Wife declare that each has had a full and fair opportunity to obtain independent legal counsel of his or her selection for the purposes of representation and the preparation of this Agreement and as to the explanation of any provisions and the legal effect of the within Agreement.

Husband acknowledges that his attorney has reviewed the within Agreement with him and has explained each provision of said Agreement as to its legal effect.

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DUBOIS, PA 15801

Wife acknowledges that she has elected to proceed without counsel in this action and that she has reviewed the within Agreement herself and understands each provision of said Agreement as to its legal effect.

Both parties hereby represent that their execution of this Agreement is not the result of any duress or undue influence, nor the result of any collusion or improper legal agreement or agreements. With this in mind, each party further represents that this Agreement is, under the circumstances, fair and reasonable, and it is being entered into freely and voluntarily.

15. Waiver of Claims Against Estates: Except as herein otherwise provided, each party may dispose of his or her property in any way, and each party hereby waives and relinquishes any and all rights he or she may now have or hereafter acquire, under the present or future laws of any jurisdiction, to share in the property or the estate of the other as a result of the marital relationship, including without limitation, dower, courtesy, statutory allowance, widow's allowance, right to take property under equitable distribution, right to take under the intestacy laws, right to take against the Will of the other, and right to act as administrator or executor of the other's estate, and each Will, at the request of the other, execute, acknowledge, and deliver any and all instruments which may be necessary or advisable to carry in to effect this

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mutual waiver and relinquishment of all such interests, rights and claims.

16. Intended Tax Result: By this Agreement, the parties have intended to effect an equal division of their marital property. The parties have determined that an equal division of such property conforms to a just and right standard with due regard to the rights of each party and the children of the marriage. The division of existing marital property is not (except as expressly provided in this Agreement) intended by the parties to constitute in any way a sale or exchange of assets, and the division is being effected without the introduction of outside funds or other property not constituting a part of the marital estate.

Each party shall claim one (1) child as a tax deduction. Upon Michelle Graham reaching the age of eighteen (18), the parties will then alternate with Katlyn Graham with each taking the deduction in alternate years.

For the year 2004, the parties shall file a joint tax return and shall divide any tax refund equally.

17. Financial Disclosure: The parties confirm that each has relied on the substantial accuracy of the financial disclosure of the other as an inducement to the execution of this Agreement.

18. Breach: If either party breaches any provision of this Agreement, the other party shall have the right, at his or her election, to sue for damages for such breach, or seek such

other remedies or relief as may be available to him or her, and the party breaching this contract shall be responsible for payment of legal fees and costs incurred by the other in enforcing their rights under this Agreement.

19. Additional Instruments: Each of the parties shall from time to time at the request of the other, execute, acknowledge, and deliver to the other party any and all further instruments that may be reasonably required to give full force and effect to the provisions of this Agreement.

20. Voluntary Execution: The provisions of this Agreement and their legal effect have been fully explained to the parties by their respective counsel, and each party acknowledges that the Agreement is fair and equitable, that it is being entered into voluntarily, and that it is not the result of any duress or undue influence.

21. Entire Agreement: This Agreement contains the entire understanding of the parties and there are no representations, warranties, covenants or undertakings other than those expressly set forth herein.

22. Modification and Waiver: A modification or Waiver of any of the provisions of this Agreement shall be effective only if made in writing and executed with the same formality as this Agreement. The failure of either party to insist upon strict performance of any of the provisions of this Agreement shall not be construed as a waiver of any subsequent default of the same or similar nature.

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RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

23. Descriptive Headings: The descriptive headings used herein are for convenience only. They shall have no effect whatsoever in determining the rights or obligations of the parties.

24. Independent Separate Covenants: It is specifically understood and agreed by and between the parties hereto that, each paragraph hereto shall be deemed to be a separate and independent covenant and agreement.

25. Applicable Law: This Agreement shall be construed under the laws of the Commonwealth of Pennsylvania.

26. Void Clauses: If any term, condition, clause or provision of this Agreement shall be determined or declared to be void or invalid in law or otherwise, then only that term, condition, clause or provision shall be stricken from this Agreement and in all other respects this Agreement shall be valid and continue in full force, effect and operation.

27. Affidavits of Consent: The parties do hereby agree to execute and file with the Court an Affidavit of Consent to the above-captioned divorce action contemporaneously with the execution of this Agreement.

IN WITNESS WHEREOF, the parties have hereunto set their hands and seals the day and year first above written.

Bruce A. Graham (SEAL)
Bruce Allen Graham

April B. Graham (SEAL)
April Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

SUBSCRIBED AND SWEARN TO
BEFORE ME THIS 7th
DAY OF March 2005.

Lois H. Lobb

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Lois H. Lobb, Notary Public
Houtzdale Boro, Clearfield County
My Commission Expires July 14, 2008
Member, Pennsylvania Association Of Notaries

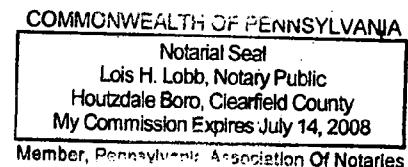
COMMONWEALTH OF PENNSYLVANIA) SS
COUNTY OF CLEARFIELD)

On this 7th day of March, ²⁰⁰⁵ ~~2004~~, before
me, the undersigned officer, personally appeared BRUCE ALLEN
GRAHAM, known to me (or satisfactorily proven) to be the
person whose name is subscribed to the within instrument and
acknowledged that he executed the same for the purposes therein
contained.

IN WITNESS WHEREOF, I hereunto set my hand and notarial seal the day and year first above written.

Don W. Faab

COMMONWEALTH OF PENNSYLVANIA) SS
COUNTY OF CLEARFIELD)



On this 7th day of March, ²⁰⁰⁵ , 2004, before
me, the undersigned officer, personally appeared APRIL GRAHAM,
known to me (or satisfactorily proven) to be the person whose
name is subscribed to the within instrument and acknowledged that
she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and notarial seal the day and year first above written.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

Joe H. Lael

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Lois H. Lobb, Notary Public
Houtzdale Boro, Clearfield County
My Commission Expires July 14, 2008

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
VITAL RECORDSCOUNTY
Clearfield

RECORD OF	
DIVORCE	OR
ANNULMENT	
<input checked="" type="checkbox"/>	(CHECK ONE)

STATE FILE NUMBER	
STATE FILE DATE	

HUSBAND

1. NAME Bruce	(First)	(Middle)	(Last) Allen	2. DATE OF BIRTH 2 23 72	(Month)	(Day)	(Year)
2. RESIDENCE 36 Oak Ridge Road, Madera, Clearfield Co., PA	Street or R.D.	City, Boro. or Twp.	County	State	4. PLACE OF BIRTH Pennsylvania (State or Foreign Country)		
5. NUMBER OF THIS MARRIAGE 1	6. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	7. USUAL OCCUPATION laborer			

WIFE

8. MAIDEN NAME Mann	(First)	(Middle)	(Last) April	9. DATE OF BIRTH 9 18 75	(Month)	(Day)	(Year)	
10. RESIDENCE 406 East Bridge St., Westover, Clearfield Co., PA	Street or R.D.	City, Boro. or Twp.	County	State	11. PLACE OF BIRTH Pennsylvania (State or Foreign Country)			
12. NUMBER OF THIS MARRIAGE 1	13. RACE WHITE <input checked="" type="checkbox"/>	BLACK <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	14. OCCUPATION homemaker				
15. PLACE OF OF THIS MARRIAGE Clearfield	(County)	(State or Foreign Country) PA			16. DATE OF THIS MARRIAGE 7 10 93	(Month)	(Day)	(Year)
17A. NUMBER OF CHIL- DREN THIS MARRIAGE 2	17B. NUMBER OF DEPENDENT CHIL- DREN UNDER 18 2	18. PLAINTIFF HUSBAND <input checked="" type="checkbox"/>	WIFE <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	19. DECREE GRANTED TO HUSBAND <input checked="" type="checkbox"/>	WIFE <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	
20. NUMBER OF CHILDREN TO CUSTODY OF <input type="checkbox"/>	HUSBAND 2	WIFE <input type="checkbox"/>	SPLIT CUSTODY <input type="checkbox"/>	OTHER (Specify) <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT 3301 (c)			
22. DATE OF DECREE	(Month)	(Day)	(Year)	23. DATE REPORT SENT TO VITAL RECORDS	(Month)	(Day)	(Year)	
24. SIGNATURE OF TRANSCRIBING CLERK								

— There is a Dr.
who is
pleading for his
release.

— Charles'.
He —

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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs-

*

No. 04-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

*

Type of Action:
Custody

Type of Pleading:
Petition for Modification

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED ^{ICG}
012-28871 Atty M. Milgrub
SEP 02 2005 ^{CR}

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

PETITION FOR MODIFICATION

AND NOW, comes Your Petitioner, Bruce Allen Graham, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Petition for Modification:

1. That by Court Order entered October 11, 2004, the Court entered an Order, upon agreement of the parties, for custody visitation rights concerning the parties minor children, Michelle Graham (d/o/b 10/18/93) and Katlyn Graham (d/o/b 11/30/95) attached hereto and marked Exhibit "A" is a copy of said Order.

2. That Your Petitioner feels that it is the best interest for the children that the Court modify the Order in the following manner:

a. That Your Petitioner have partial custody of the minor children every Wednesday from 4:30 p.m. until 8:00 p.m.

b. That Your Petitioner have the children for three nonconsecutive weeks during the summer months.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

c. That Your Petitioner have telephone communication with the children each Tuesday and Thursday at 8:00 p.m. with father initiating the phone call.

d. That Your Petitioner have the children until 9:00 p.m. on Sundays of his weekends during the summer months.

3. That mother is presently on assistance and father is paying monthly support payments for the minor children which are believed to be current.

4. That pursuant to a Property Settlement Agreement, each party is entitled to one minor child's tax deduction.

5. That it is more financially advantageous to Your Petitioner to have both deductions and Your Petitioner's willing to share the savings for the second deduction with the Respondent.

6. Your Petitioner requests that as long as it is financially advantageous that he be allowed to take both deductions with Petitioner and Respondent sharing the savings on the second deduction.

WHEREFORE, Your Petitioner respects the Court modify the existing Order because it would be in the best interest of the children.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

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

BRUCE ALLEN GRAHAM :
-vs- : No. 04-1427-CD
APRIL GRAHAM :

ORDER

NOW, this 11th day of October, 2004, this being the date set for Custody Conference and upon agreement of the parties, it is the ORDER of this Court as follows:

1. The parties shall have joint and shared legal custody of their minor children, Michelle Graham (D.O.B. 10-18-93) and Katlyn Graham (D.O.B. 11-30-95). Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians, dentists, mental health providers and

EXHIBIT "A"

teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Primary physical custody of the children shall be with the mother, subject to periods of partial custody in the father as follows:

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

B. A seven (7) day consecutive period during the summer months upon giving mother at least one (1) weeks notice;

C. In even-numbered years, father shall have the children from 9:00 a.m. until 2:00 p.m. on Thanksgiving and in odd-numbered years from 2:00 p.m. until 8:00 p.m.;

D. In even-numbered years, father shall have the children on Christmas Eve from 6:00 p.m. until Christmas Day at noon. In odd-numbered years, father shall have the children on Christmas Day from noon until 8:00 p.m.

E. The following holidays shall be alternated between the parties: Memorial Day, July 4th and Labor Day. Said schedule shall commence with father having the minor children on Memorial Day 2005;

F. The party initiating physical custody shall be responsible for transportation;

- G. Any and all times as the parties may agree.
3. Father shall be entitled to reasonable telephone communication with the minor children;
4. It is specifically understood that either party may petition the Court for modification of this order.

BY THE COURT,

/s/ Paul E. Cherry

Judge

hereby certify, this to be a true and accurate copy of the original and true copy of this order.

OCT 11 2004

Attest:

Paul E. Cherry
Paul E. Cherry
Clerk of the Court

we, the undersigned, hereby consent to the entry
of the above addendum.

Bruce Graham
BRUCE ALLEN GRAHAM
Plaintiff

April Graham
APRIL GRAHAM
Defendant

D. C. T. C. L.
Attorney for Plaintiff

I, Bruce Allen Graham , verify that the statements made in the Petition 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: 8/31/05

* Bruce Allen Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 02 2005

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs-

*

No. 04-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

*

Type of Action:
Custody

Type of Pleading:
Praeclipe to Withdraw Petition
for Modification

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 06 2005

07:45 (U)

William A. Shaw

Prothonotary/Clerk of Courts

No C/C.

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

PRAECLPTE TO WITHDRAW PETITION FOR MODIFICATION

TO THE PROTHONOTARY:

Please withdraw the Petition for Modification filed in
the above-captioned matter.

By


Richard H. Milgrub, Esquire
Attorney for Plaintiff

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 06 2005

William A. Shaw
Prothonotary/Clerk of Courts

WANAY KNOW'S

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

BRUCE ALLEN GRAHAM,
Plaintiff
*
*
*
-vs-
APRIL GRAHAM,
Defendant

No. 04-1427-CD

Type of Action:
Custody

Type of Pleading:
Petition for Modification

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED
SEP 07 2005
0721351
William A. Shaw
Prothonotary/Clerk of Courts
1 CERT to ATTY

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

PETITION FOR MODIFICATION

AND NOW, comes Your Petitioner, Bruce Allen Graham, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Petition for Modification:

1. That by Court Order entered October 11, 2004, the Court entered an Order, upon agreement of the parties, for custody visitation rights concerning the parties minor children, Michelle Graham (d/o/b 10/18/93) and Katlyn Graham (d/o/b 11/30/95) attached hereto and marked Exhibit "A" is a copy of said Order.

2. That Your Petitioner feels that it is the best interest for the children that the Court modify the Order in the following manner:

a. That Your Petitioner have partial custody of the minor children every Wednesday from 4:30 p.m. until 8:00 p.m.

b. That Your Petitioner have the children for three nonconsecutive weeks during the summer months.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

c. That Your Petitioner have telephone communication with the children each Tuesday and Thursday at 8:00 p.m. with father initiating the phone call.

d. That Your Petitioner have the children until 9:00 p.m. on Sundays of his weekends during the summer months.

3. That mother is presently on assistance and father is paying monthly support payments for the minor children which are believed to be current.

4. That pursuant to a Property Settlement Agreement, each party is entitled to one minor child's tax deduction.

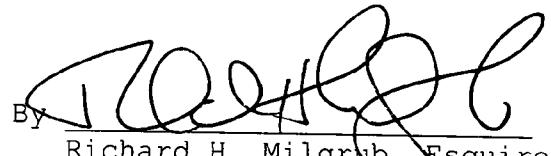
5. That it is more financially advantageous to Your Petitioner to have both deductions and Your Petitioner's willing to share the savings for the second deduction with the Respondent.

6. Your Petitioner requests that as long as it is financially advantageous that he be allowed to take both deductions with Petitioner and Respondent sharing the savings on the second deduction.

WHEREFORE, Your Petitioner respects the Court modify the existing Order because it would be in the best interest of the children.

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

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

BRUCE ALLEN GRAHAM :
-vs- : No. 04-1427-CD
APRIL GRAHAM :

O R D E R

NOW, this 11th day of October, 2004, this being the date set for Custody Conference and upon agreement of the parties, it is the ORDER of this Court as follows:

1. The parties shall have joint and shared legal custody of their minor children, Michelle Graham (D.O.B. 10-18-93) and Katlyn Graham (D.O.B. 11-30-95). Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians, dentists, mental health providers and

EXHIBIT "A"

teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Primary physical custody of the children shall be with the mother, subject to periods of partial custody in the father as follows:

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

B. A seven (7) day consecutive period during the summer months upon giving mother at least one (1) weeks notice;

C. In even-numbered years, father shall have the children from 9:00 a.m. until 2:00 p.m. on Thanksgiving and in odd-numbered years from 2:00 p.m. until 8:00 p.m.;

D. In even-numbered years, father shall have the children on Christmas Eve from 6:00 p.m. until Christmas Day at noon. In odd-numbered years, father shall have the children on Christmas Day from noon until 8:00 p.m.

E. The following holidays shall be alternated between the parties: Memorial Day, July 4th and Labor Day. Said schedule shall commence with father having the minor children on Memorial Day 2005;

F. The party initiating physical custody shall be responsible for transportation;

- G. Any and all times as the parties may agree.
3. Father shall be entitled to reasonable telephone communication with the minor children;
4. It is specifically understood that either party may petition the Court for modification of this Order.

BY THE COURT,

/s/ Paul E. Cherry

Judge

Paul E. Cherry
Judge
Court of Common Pleas
Cuyahoga County, Ohio

10/10/04

10/10/04
Cuyahoga County

I, Bruce Allen Graham, verify that the statements made in the Petition 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: 3/24/05

Bruce Allen Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED
SEP 07 2005
William A. Shaw
Prothonotary Clerk, C. Counties

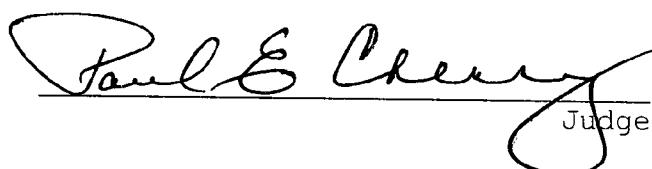
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

AND NOW, this 12th day of September 2005, upon
consideration of the Plaintiff's Petition for Modification of
Visitation Order, it is hereby ORDERED and DIRECTED that the a
Rule be issued upon the Defendant to show cause why the current
Order should not be modified.

Rule returnable by hearing the 5th day of October,
2005 at 9:00 a.m.

BY THE COURT:


Paul E. Cherry
Judge

FILED

9/14/05 LM 20054 ~~milgrub~~
SEP 13 2005 milgrub

(6)

William A. Shaw
Prothonotary

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 13 2005

William A. Shaw
Prothonotary

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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs-

*

No. 04-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

*

Type of Action:
Custody

Type of Pleading:
Petition for Continuance

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED 012450 AM
SEP 14 2005
6K

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

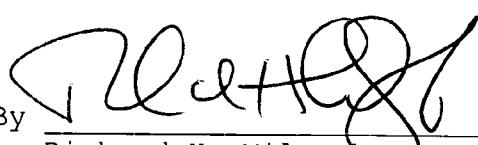
PETITION FOR CONTINUANCE

AND NOW, comes Your Petitioner, Bruce Allen Graham, by
and through his attorney, Richard H. Milgrub, who files the
following Motion for Continuance:

1. That Your Petitioner has a hearing for
Modification of Visitation Order scheduled for October 5, 2005
at 91:00 a.m. in the Clearfield County Courthouse.
2. That the Petitioner's attorney, Richard H.
Milgrub, is scheduled for a Preliminary Hearing in Bellefonte
that morning and will be unavailable.

WHEREFORE, Your Petitioner respectfully requests that
the matter be rescheduled to another date.

By



Richard H. Milgrub, Esquire
Attorney for Petitioner

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

VERIFICATION

I, Richard H. Milgrub, have read the foregoing Petition to Continue. The Statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to penalties of 18 Pa. C.S. '4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

I am authorized to make this verification on behalf of the Defendant because of my position as counsel of record.



Richard H. Milgrub

Dated: 9/14/05

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

SEP 14 2005

William A. Show

Prothonotary Clerk of Courts

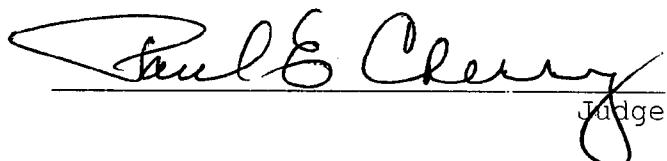
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

ORDER

AND NOW, this 15th day of September 2005, upon
consideration of the Petitioner's Petition for Continuance, it
is hereby ORDERED and DECREED that the hearing for Modification
of Visitation Order scheduled for October 5, 2005 at 9:00 a.m.
is hereby continued until the 28th day of October, 2005 at
2:30 P.m in Courtroom No. 2 of the Clearfield County
Courthouse, Clearfield, Pennsylvania.

BY THE COURT:



Paul E. Cherry
Judge

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830
—
109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED ^{cc}
01/10/06 Atty Milgrub
SEP 16 2005 (GK)

William A. Shaw
Prothonotary/Clerk of Courts

File#
SEP 16 2005
FBI - BIRMINGHAM
Prothonotary Clerk's Office

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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

VS

* No. 04-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

Type of Pleading:
Affidavit of Service

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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102-46001
SEP 28 2005
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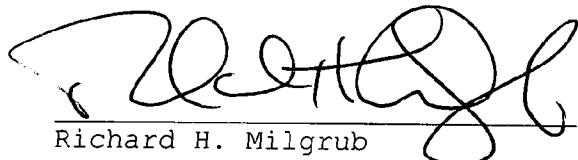
William A. Glaw
Prothonotary Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
VS * No. 04-1427-CD
*
APRIL GRAHAM, *
Defendant *

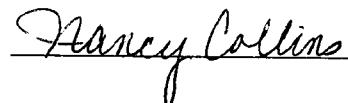
AFFIDAVIT OF SERVICE

I, Richard H. Milgrub, attorney for the above-named Plaintiff, being duly sworn according to law, deposes and states that Plaintiff's Petition for Modification and Order was served upon April Graham, by certified mail, return receipt requested on September 26, 2005, at her residence of 994 West Hannah Street, Houtzdale, Pennsylvania, 16651 as appears from receipt of certified mail attached hereto.

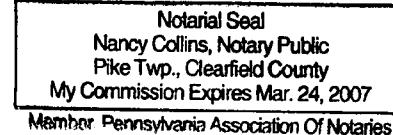


Richard H. Milgrub

SWORN and SUBSCRIBED to before me this 28th day of September, 2005.



Nancy Collins



THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

April Graham
994 West Hannah St.
Houtzdale PA 16651

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

April Graham Agent Addressee

B. Received by (Printed Name)

April Graham C. Date of Delivery

9/26/05

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

4. Restricted Delivery? (Extra Fee) Yes**2. Article Number**

(Transfer from service label)

7003 1680 0005 6738 2581

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM :
-vs- : No. 04-1427-CD
APRIL GRAHAM :

CA
FILED *Dec 14 2005*
D1035801 M. Grub
NOV 02 2005 *cc*
William A. Shaw *Def.*
Prothonotary/Clerk of Courts *404 E Bridge St*
We Stover, PA *11drg2*
GR

ORDER

NOW, this 28th day of October, 2005, following hearing on Petition for Modification and upon consideration of the same, it is the ORDER of this Court that said Petition be and is hereby granted. This Court's order of October 11, 2004, shall be and is hereby modified as follows:

1. Primary physical custody of the minor children shall continue to be with mother, April Graham, subject to the following periods of partial custody in father:

- a) Every other weekend, commencing Friday at 6:00 p.m. until Sunday at 6:00 p.m.;
- b) Each and every Wednesday, beginning November 2, 2005, from 4:30 p.m. until 8:00 p.m.;
- c) During the summer, father shall have partial custody of the minor children one (1) week during the months of June, July and August, separated by at least one (1) week. The one (1) week periods of custody shall be as

the parties may agree. Father shall provide mother with notice of which weeks in the summer he desires to exercise his periods of partial custody by no later than May 15 of each year. If the parties cannot agree for each of the said three (3) months, father shall have partial custody from noon on the second Sunday of the month until noon on the third Sunday of the month;

d) During the summer months, father's periods of weekend visitation shall be extended to 9:00 p.m. on Sunday.

2. Mother shall be entitled to have custody of the minor children one (1) week during the months of June and July and August, separated by at least one (1) week. The one (1) week periods of custody during each month shall be as the parties may agree. Mother shall provide father notice of which weeks in the summer she desires to exercise her exclusive periods of custody by no later than May 15 of each year. If the parties cannot agree for each of the said three (3) months, mother shall have partial custody from the fourth Sunday of the month until the first Sunday of the new month;

3. Unless otherwise agreed upon by the parties, the parties shall share transportation, with the party who is to obtain custody of the children shall provide transportation. This may be the parent or that parent's

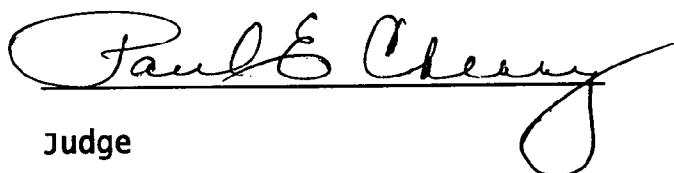
adult designee, with the designee being required to have an established relationship with the children;

4. Neither parent shall restrict telephone contact between the children and the parent not in possession of the children. The parent who is not in possession of the children may have reasonable telephone contact with the children, which means up to three (3) telephone calls per week, provided the same is done by no later than 8:00 p.m.;

5. Holiday and summertime periods of custody shall take precedence over the other periods of custody set forth herein;

6. All other terms and provisions of this Court's Order of October 11, 2004, not inconsistent herewith shall continue to be in full force and effect.

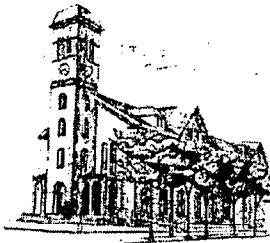
BY THE COURT,


Judge

FILED

NOV 02 2005

U.S. District Court
Prothonotary, Eastern District of North Carolina



Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

David S. Ammerman
Solicitor

Jacki Kendrick
Deputy Prothonotary

Bonnie Hudson
Administrative Assistant

To: All Concerned Parties

From: William A. Shaw, Prothonotary

Date: September 19, 2005

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

Sincerely,

William A. Shaw
Prothonotary

You are responsible for serving all appropriate parties.

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

Plaintiff(s)/Attorney(s)

Defendant(s)/Attorney(s)

Other

Special Instructions:

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

UA
FILED ICC AH
01/10/30 LM Milgrub
MAR 31 2009 (EX)

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs- * No. 2004-1427-CD

*

*

*

APRIL GRAHAM,
Defendant

*

Type of Action:
Divorce

Type of Pleading:
Petition for Modification
of Order

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

PETITION FOR MODIFICATION OF ORDER

AND NOW, comes Your Petitioner, Bruce Allen Graham, by and through his attorney, Richard H. Milgrub, Esquire who files the following Petition for Modification of Order and in support thereof, avers the following:

1. By Court Order entered October 11, 2004 and modified by Court Order entered October 28, 2005, the parties were granted joint shared legal custody of their minor children, Michelle Graham (DOB: 10/18/93) and Katlyn Graham (DOB: 11/30/95). Attached hereto and marked Exhibit "A" and Exhibit "B" are copies of said Orders.

2. Your Petitioner feels that it is in the best interest of the children that the Court modify the Order for the following reasons:

a. the minor children have expressed a desire to reside with Your Petitioner;

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

b. the Respondent has refused to allow Your Petitioner to see the minor children unless said periods of partial custody take place at her home with her being present;

c. the Respondent has severely limited any and all interaction between Your Petitioner and the minor children;

d. the Respondent has repeatedly told the minor children that Your Petitioner has abandoned them and therefore has no legal rights with regard to the minor children;

e. Your Petitioner feels that there is a certain amount of instability in Respondent's life and feels that he can offer the children a more stable family environment; and

f. Your Petitioner feels that it would be in the best interests of the children if he was granted primary physical custody.

WHEREFORE, Your Petitioner respectfully requests that the present Custody Order be modified and the relief requested by Your Petitioner in this Petition be granted.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM :
-vs- : No. 04-1427-CD
APRIL GRAHAM :

ORDER

NOW, this 11th day of October, 2004, this being the date set for Custody Conference and upon agreement of the parties, it is the ORDER of this Court as follows:

1. The parties shall have joint and shared legal custody of their minor children, Michelle Graham (D.O.B. 10-18-93) and Katlyn Graham (D.O.B. 11-30-95). Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this Order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians, dentists, mental health providers and

EXHIBIT "A"

teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Primary physical custody of the children shall be with the mother, subject to periods of partial custody in the father as follows:

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

B. A seven (7) day consecutive period during the summer months upon giving mother at least one (1) weeks notice;

C. In even-numbered years, father shall have the children from 9:00 a.m. until 2:00 p.m. on Thanksgiving and in odd-numbered years from 2:00 p.m. until 8:00 p.m.;

D. In even-numbered years, father shall have the children on Christmas Eve from 6:00 p.m. until Christmas Day at noon. In odd-numbered years, father shall have the children on Christmas Day from noon until 8:00 p.m.

E. The following holidays shall be alternated between the parties: Memorial Day, July 4th and Labor Day. Said schedule shall commence with father having the minor children on Memorial Day 2005;

F. The party initiating physical custody shall be responsible for transportation;

- G. Any and all times as the parties may agree.
3. Father shall be entitled to reasonable telephone communication with the minor children;
4. It is specifically understood that either party may petition the Court for modification of this Order.

BY THE COURT,

/s/ Paul E. Cherry

Judge

Robert, 1870-1945, author of *Robert and the Riddle* and *Robert and the Mystery*, and *Robert and the Mystery*.

100-2000

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

BRUCE ALLEN GRAHAM

:

-VS-

: No. 04-1427-CD

APRIL GRAHAM

:

O R D E R

NOW, this 28th day of October, 2005, following hearing on Petition for Modification and upon consideration of the same, it is the ORDER of this Court that said Petition be and is hereby granted. This Court's Order of October 11, 2004, shall be and is hereby modified as follows:

1. Primary physical custody of the minor children shall continue to be with mother, April Graham, subject to the following periods of partial custody in father:

a) Every other weekend, commencing Friday at 6:00 p.m. until Sunday at 6:00 p.m.;

b) Each and every Wednesday, beginning November 2, 2005, from 4:30 p.m. until 8:00 p.m.;

c) During the summer, father shall have partial custody of the minor children one (1) week during the months of June, July and August, separated by at least one (1) week. The one (1) week periods of custody shall be as

the parties may agree. Father shall provide mother with notice of which weeks in the summer he desires to exercise his periods of partial custody by no later than May 15 of each year. If the parties cannot agree for each of the said three (3) months, father shall have partial custody from noon on the second Sunday of the month until noon on the third Sunday of the month;

d) During the summer months, father's periods of weekend visitation shall be extended to 9:00 p.m. on Sunday.

2. Mother shall be entitled to have custody of the minor children one (1) week during the months of June and July and August, separated by at least one (1) week. The one (1) week periods of custody during each month shall be as the parties may agree. Mother shall provide father notice of which weeks in the summer she desires to exercise her exclusive periods of custody by no later than May 15 of each year. If the parties cannot agree for each of the said three (3) months, mother shall have partial custody from the fourth Sunday of the month until the first Sunday of the new month;

3. Unless otherwise agreed upon by the parties, the parties shall share transportation, with the party who is to obtain custody of the children shall provide transportation. This may be the parent or that parent's

adult designee, with the designee being required to have an established relationship with the children;

4. Neither parent shall restrict telephone contact between the children and the parent not in possession of the children. The parent who is not in possession of the children may have reasonable telephone contact with the children, which means up to three (3) telephone calls per week, provided the same is done by no later than 8:00 p.m.;

5. Holiday and summertime periods of custody shall take precedence over the other periods of custody set forth herein;

6. All other terms and provisions of this Court's Order of October 11, 2004, not inconsistent herewith shall continue to be in full force and effect.

BY THE COURT,

/s/ Paul E. Cherry

Judge

Paul E. Cherry, Jr. to be a true
and correct copy of the original
document filed in this cause.

NOV 02 2005

AM

Paul E. Cherry
Judge

I, Bruce Allen Graham, verify that the statements made in the Petition are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: 3/30/09

x Bruce Allen Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

VA
FILED ICC Atty
9 10:30AM Milgrub

MAR 3 1 2009

60

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
*
* -vs- * No. 2004-142-CD
Prothonotary/Clerk of Courts
*
*
APRIL GRAHAM, *
Defendant *

Type of Action:
Divorce

Type of Pleading:
Petition for Contempt

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

PETITION FOR CONTEMPT

AND NOW, comes Your Petitioner, Bruce Allen Graham, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Petition for Contempt and in support thereof, avers the following:

1. By Court Order entered October 11, 2004 and modified by Court Order entered October 28, 2005, the parties were granted joint shared legal custody of their minor children, Michelle Graham (DOB: 10/18/93) and Katlyn Graham (DOB: 11/30/95). Attached hereto and marked Exhibit "A" and Exhibit "B" are copies of said Orders.

2. Pursuant to said Court Orders, certain periods of partial custody were set forth.

3. The Respondent, without cause, has refused Your Petitioner the right to exercise his rights under said Order whereby refusing to allow him to have the children on an every-

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

other-weekend basis or to communicate with the children by telephone.

4. Despite requests by Your Petitioner to the Respondent to be able to exercise his rights under said Order, the Respondent has continued to refuse to do so.

5. The Respondent's actions are in contempt of the Court's Order.

6. Your Petitioner has had to incur the costs of retaining an attorney to file this Petition in the amount of Five hundred dollars (\$500.00).

WHEREFORE, Your Petitioner respectfully requests that the Respondent be found in contempt of the Court's Order and ordered to pay Your Petitioner's attorney fees in the amount of Five hundred dollars (\$500.00) for the filing of this Petition and attendance at hearing thereon.

By: 

Richard H. Milgrub, Esquire
Attorney for Plaintiff

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRUCE ALLEN GRAHAM :

-vs- : No. 04-1427-CD

APRIL GRAHAM :

O R D E R

NOW, this 11th day of October, 2004, this being the date set for Custody Conference and upon agreement of the parties, it is the ORDER of this Court as follows:

1. The parties shall have joint and shared legal custody of their minor children, Michelle Graham (D.O.B. 10-18-93) and Katlyn Graham (D.O.B. 11-30-95). Legal custody shall be defined as the legal right to make major decisions affecting the best interests of the children including, but not limited to, medical, religious and educational decisions, and that each parent shall have equal access to any and all medical, dental, school and legal records. Medical, dental and other professional providers, as well as school administrations, shall accept a copy of this Order as authorization to release documentation to either parent. It is also understood by both parties that they shall communicate fully with each other to assure all directives pertaining to the children from physicians, dentists, mental health providers and

teachers are followed absolutely and that all information pertaining to any prescriptions for the children are exchanged between the parties;

2. Primary physical custody of the children shall be with the mother, subject to periods of partial custody in the father as follows:

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

B. A seven (7) day consecutive period during the summer months upon giving mother at least one (1) weeks notice;

C. In even-numbered years, father shall have the children from 9:00 a.m. until 2:00 p.m. on Thanksgiving and in odd-numbered years from 2:00 p.m. until 8:00 p.m.;

D. In even-numbered years, father shall have the children on Christmas Eve from 6:00 p.m. until Christmas Day at noon. In odd-numbered years, father shall have the children on Christmas Day from noon until 8:00 p.m.

E. The following holidays shall be alternated between the parties: Memorial Day, July 4th and Labor Day. Said schedule shall commence with father having the minor children on Memorial Day 2005;

F. The party initiating physical custody shall be responsible for transportation;

- G. Any and all times as the parties may agree.
3. Father shall be entitled to reasonable telephone communication with the minor children;
4. It is specifically understood that either party may petition the Court for modification of this order.

BY THE COURT,

/s/ Paul E. Cherry

Judge

RECEIVED
CLERK'S OFFICE
CLARK COUNTY, NEVADA
JULY 10, 1994

JULY 10, 1994

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

BRUCE ALLEN GRAHAM :

-vs- : No. 04-1427-CD

APRIL GRAHAM :

O R D E R

NOW, this 28th day of October, 2005, following hearing on Petition for Modification and upon consideration of the same, it is the ORDER of this Court that said Petition be and is hereby granted. This Court's Order of October 11, 2004, shall be and is hereby modified as follows:

1. Primary physical custody of the minor children shall continue to be with mother, April Graham, subject to the following periods of partial custody in father:

a) Every other weekend, commencing Friday at 6:00 p.m. until Sunday at 6:00 p.m.;

b) Each and every Wednesday, beginning November 2, 2005, from 4:30 p.m. until 8:00 p.m.;

c) During the summer, father shall have partial custody of the minor children one (1) week during the months of June, July and August, separated by at least one (1) week. The one (1) week periods of custody shall be as

the parties may agree. Father shall provide mother with notice of which weeks in the summer he desires to exercise his periods of partial custody by no later than May 15 of each year. If the parties cannot agree for each of the said three (3) months, father shall have partial custody from noon on the second Sunday of the month until noon on the third Sunday of the month;

d) During the summer months, father's periods of weekend visitation shall be extended to 9:00 p.m. on Sunday.

2. Mother shall be entitled to have custody of the minor children one (1) week during the months of June and July and August, separated by at least one (1) week. The one (1) week periods of custody during each month shall be as the parties may agree. Mother shall provide father notice of which weeks in the summer she desires to exercise her exclusive periods of custody by no later than May 15 of each year. If the parties cannot agree for each of the said three (3) months, mother shall have partial custody from the fourth Sunday of the month until the first Sunday of the new month;

3. Unless otherwise agreed upon by the parties, the parties shall share transportation, with the party who is to obtain custody of the children shall provide transportation. This may be the parent or that parent's

adult designee, with the designee being required to have an established relationship with the children;

4. Neither parent shall restrict telephone contact between the children and the parent not in possession of the children. The parent who is not in possession of the children may have reasonable telephone contact with the children, which means up to three (3) telephone calls per week, provided the same is done by no later than 8:00 p.m.;

5. Holiday and summertime periods of custody shall take precedence over the other periods of custody set forth herein;

6. All other terms and provisions of this Court's Order of October 11, 2004, not inconsistent herewith shall continue to be in full force and effect.

BY THE COURT,

/s/ Paul E. Cherry

Judge

NOV 3 2 2005

I, Bruce Allen Graham verify that the statements made in the Petition are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: 3/30/09

Bruce Allen Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

MAR 31 2009

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

ORDER

AND NOW, this 31st day of March, 2009, upon
consideration of the Plaintiff's Petition for Contempt, it is
hereby ORDERED and DECREED that hearing on said Petition be
scheduled for the 5th day of June, 2009 at 9:00
A.m. in Courtroom 2 of the Clearfield County Courthouse,
Clearfield, Pennsylvania. 1 hour(s) has/have been allotted for
said hearing.

BY THE COURT:

Paul E Cherry
Judge

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

?FILED *cc*
APR 01 2009 Atty Milgrub
William A. Shaw
Prothonotary/Clerk of Courts

FILED

APR 01 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 4/1/09

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other
 Defendant(s) Defendant(s) Attorney

Special Instructions:

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
*
-vs- * No. 2004-1427-CD
*
*
APRIL GRAHAM, *
Defendant *

5 **FILED**
04/02/09 Aug
APR 02 2009
William A. Shaw
Prothonotary/Clerk of Courts
J. Milgrub

ORDER OF COURT

YOU, April Graham, Defendant, have been sued in Court to obtain shared legal and primary physical custody of the children: Michelle Graham and Katlyn Graham.

You are ordered to appear in person the 21st day of April, 2009, at 10:30 A.M. for a Custody Conference. Please report to the Court Administrator's Office, 2nd Floor, Clearfield County Courthouse, Clearfield, Pennsylvania. 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. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641

BY THE COURT:

Paul E. Cherry
Judge

April 2, 2009

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

AMERICANS 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:

4/2/09

Brandy A. Wilson
District Court Administrator

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED

APR 02 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 4/2/09

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

Special Instructions:

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

Type of Pleading:
Affidavit of Service

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esq.
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

5
FILED No. 2
04/14/2009
APR 14 2009
WM

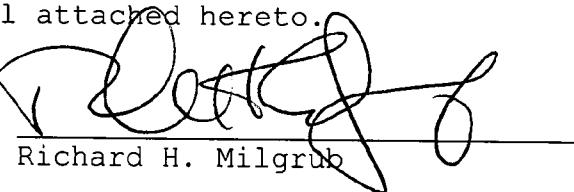
William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

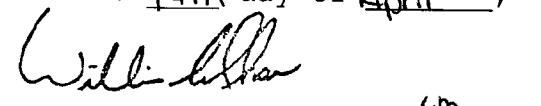
AFFIDAVIT OF SERVICE

Richard H. Milgrub, attorney for Plaintiff, being duly sworn according to law, deposes and states that a certified copy of the Petition for Modification of Order and Order of Court scheduling a Custody Conference for April 21, 2009 at 10:30 a.m., along with a certified copy of a Petition for Contempt and Order scheduling Hearing for June 5, 2009 at 9:00 a.m. was served upon the Defendant by certified mail, return receipt requested on April 13, 2009, at the Defendant's residence of 306 South Penn Street, Punxsutawney, Pennsylvania 15767, as appears from receipt of certified mail attached hereto.



Richard H. Milgrub

SWORN and SUBSCRIBED to before me this 14th day of April, 2009.



William A. Shaw

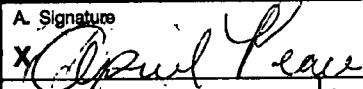
WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

SENDER: COMPLETE THIS SECTION

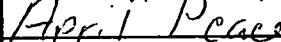
- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

April Graham
306 South Penn Street
Punxsutawney, PA 15767

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

Agent
 Addressee

B. Received by (Printed Name)**C. Date of Delivery**

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

**3. Service Type**

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

2. Article Number

(Transfer from service label)

7008 3230 0003 3587 9556

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

FILED

APR 11 2000

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM

}

VS

} NO. 2004-1427-CD

APRIL GRAHAM

}

5 FILED

APR 21 2009

0/4-2009

William A. Shaw
Prothonotary/Clerk of Courts

Case to

MURKIN &
DEFT.

O R D E R

NOW, this 21st day of April, 2009, following custody conference and upon agreement of the parties, it is hereby ORDERED as follows:

1. Plaintiff, BRUCE ALLEN GRAHAM (hereinafter "Father"), and Defendant, APRIL GRAHAM (hereinafter "Mother"), shall share joint legal custody of the parties' minor children, namely, MICHELLE GRAHAM (D.O.B. 10/18/1993) and KATLYN GRAHAM (D.O.B. 11/30/1995).

Legal custody is defined as the legal right to make major decisions affecting the best interests of the minor children, including, but not limited to, medical, religious and educational decisions and wherein each parent shall have equal access to any and all medical, dental, ocular, mental health, school and health records.

Medical, dental, ocular and mental health providers, as well as school administrators, shall accept a copy of this Order as authorization to release to either parent any documentation and/or records as may be

requested.

It is understood by both parents that they shall communicate fully with each other in an effort to ensure that all directives pertaining to the minor children from physicians, dentists and teachers are followed absolutely and that all information pertaining to any prescriptions the children may be on is exchanged between the parties.

2. Father shall enjoy primary physical custody of their minor child KATLYN GRAHAM subject to Mother's periods of partial custody as the parties may agree.

3. Mother shall enjoy primary physical custody of their minor child MICHELLE GRAHAM subject to Father's periods of partial custody as the parties may agree.

4. Either party may request this matter to be scheduled for mediation conference before Dr. Allen Ryen, Ph.D.

BY THE COURT,

Paul E Cherry
Judge

We, the undersigned, do hereby consent to the entry of the foregoing Order.

Bruce Allen Graham

BRUCE ALLEN GRAHAM

Plaintiff

April Graham

APRIL GRAHAM

Defendant

R. Milgrub

RICHARD H. MILGRUB, ESQ.

Attorney for Plaintiff

DATE: 4-21-09
You are responsible for serving all appropriate parties.
The Prothonotary's office has provided service to the following parties:
 Plaintiff(s) Plaintiff(s) Attorney Defendants Attorney Other
 Defendant(s)
Special Instructions:

April 21, 2009
406 E. Spring
Westerville, OH
1662L

Prothonotary/Clerk of Courts
William A. Shew

APR 21 2009

FILED

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

*

*

*

* No. 2004-1427-CD

APRIL GRAHAM,
Defendant

*

*

*

Type of Pleading:

Praeclipe to Withdraw
Petition for Contempt

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

FILED 107301
APR 22 2009 *Aug Milgrub*

5
William A. Shaw
Prothonotary/Clerk of Courts

(64)

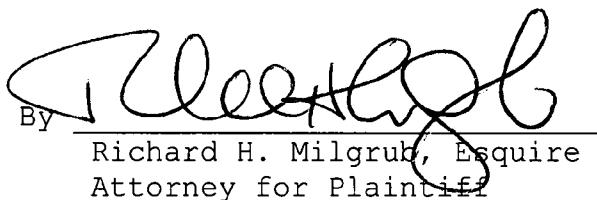
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

PRAECIPE TO WITHDRAW PETITION FOR CONTEMPT

TO THE PROTHONOTARY:

Please withdraw the Plaintiff's Petition for Contempt
filed in the above-entitled action. The hearing scheduled for
June 5, 2009 at 9:00 a.m. is no longer necessary.


By _____
Richard H. Milgrub, Esquire
Attorney for Plaintiff

FILED

APR 22 2009

William A. Shaw
Prothonotary/Clerk of Courts

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

FILED
12:17 PM
APR 27 2009

William A. Shaw
Prothonotary/Clerk of Courts

remailed to
306 South Penn St.
Punxsutawney PA
15767

April Graham
406 E. Bridge St.
Westover, PA 16602

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

BRUCE ALLEN GRAHAM }
VS } NO. 2004-1427-CD
APRIL GRAHAM } *Subpoena*

O R D E R

NOW, this 21st day of April, 2009, following custody conference and upon agreement of the parties, it is hereby ORDERED as follows:

1. Plaintiff, BRUCE ALLEN GRAHAM (hereinafter "Father"), and Defendant, APRIL GRAHAM (hereinafter "Mother"), shall share joint legal custody of the parties' minor children, namely, MICHELLE GRAHAM (D.O.B. 10/18/1993) and KATLYN GRAHAM (D.O.B. 11/30/1995).

Legal custody is defined as the legal right to make major decisions affecting the best interests of the minor children, including, but not limited to, medical, religious and educational decisions and wherein each parent shall have equal access to any and all medical, dental, ocular, mental health, school and health records.

Medical, dental, ocular and mental health providers, as well as school administrators, shall accept a copy of this Order as authorization to release to either parent any documentation and/or records as may be

requested.

It is understood by both parents that they shall communicate fully with each other in an effort to ensure that all directives pertaining to the minor children from physicians, dentists and teachers are followed absolutely and that all information pertaining to any prescriptions the children may be on is exchanged between the parties.

2. Father shall enjoy primary physical custody of their minor child KATLYN GRAHAM subject to Mother's periods of partial custody as the parties may agree.

3. Mother shall enjoy primary physical custody of their minor child MICHELLE GRAHAM subject to Father's periods of partial custody as the parties may agree.

4. Either party may request this matter to be scheduled for mediation conference before Dr. Allen Ryen, Ph.D.

BY THE COURT.

/s/ Paul E. Cherry

Judge



We, the undersigned, do hereby consent to the entry of the foregoing Order.

Bruce Graham

BRUCE ALLEN GRAHAM

Plaintiff

April Graham

APRIL GRAHAM

Defendant

R. Milgrub

RICHARD H. MILGRUB, ESQ.

Attorney for Plaintiff

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

Type of Pleading:
Petition for Modification
of Custody Consent Order

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esquire
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

FILED 10:15AM
JUN 02 2009
60

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

PETITION FOR MODIFICATION OF CUSTODY CONSENT ORDER

AND NOW, comes Your Petitioner, Bruce Allen Graham, by and through his attorney, Richard H. Milgrub, Esquire, who files the following Petition for Modification of Custody Consent Order and in support thereof, avers the following:

1. Your Petitioner, Bruce Allen Graham, and the Respondent, April Graham, are the parents of two (2) minor children, Michelle Graham (DOB: 10/18/93) and Katlyn Graham (DOB: 11/30/95).

2. Pursuant to a Court Order entered April 21, 2009 and attached hereto and marked Exhibit "A", Your Petitioner was granted primary physical custody of the minor child, Katlyn Graham, and the Respondent was granted primary physical custody of the minor child, Michelle Graham.

3. Your Petitioner wishes that the Court Order be modified for the following reasons:

a. on May 17, 2009, the minor child, Michelle Graham, moved from the Respondent's home into the home of her maternal grandmother;

b. on May 25, 2009, the minor child, Michelle Graham, moved in with Your Petitioner;

c. the minor child has expressed a strong desire to remain with her father, sister, and step-mother;

d. Your Petitioner feels that he can offer his daughter a more stable and loving family environment;

e. Your Petitioner feels that it would be in the best interest of both minor children that they remain together;

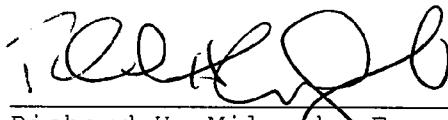
f. the Respondent and her live-in paramour are separated; and

g. the minor child, Michelle Graham, has noticed physical abuse between the Respondent and Respondent's live-in paramour in her presence.

4. Your Petitioner has asked the Respondent to consent to said arrangement and the Respondent has refused.

WHEREFORE, Your Petitioner respectfully requests that the Order be modified and that Your Petitioner be granted primary physical custody of the minor child, Michelle Graham.

By


Richard H. Milgrub, Esquire
Attorney for Plaintiff

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

BRUCE ALLEN GRAHAM	}	
VS	}	NO. 2004-1427-CD
APRIL GRAHAM	}	5-10-04

O R D E R

NOW, this 21st day of April, 2009, following custody conference and upon agreement of the parties, it is hereby ORDERED as follows:

1. Plaintiff, BRUCE ALLEN GRAHAM (hereinafter "Father"), and Defendant, APRIL GRAHAM (hereinafter "Mother"), shall share joint legal custody of the parties' minor children, namely, MICHELLE GRAHAM (D.O.B. 10/18/1993) and KATLYN GRAHAM (D.O.B. 11/30/1995).

Legal custody is defined as the legal right to make major decisions affecting the best interests of the minor children, including, but not limited to, medical, religious and educational decisions and wherein each parent shall have equal access to any and all medical, dental, ocular, mental health, school and health records.

Medical, dental, ocular and mental health providers, as well as school administrators, shall accept a copy of this Order as authorization to release to either parent any documentation and/or records as may be

EXHIBIT "A"

requested.

It is understood by both parents that they shall communicate fully with each other in an effort to ensure that all directives pertaining to the minor children from physicians, dentists and teachers are followed absolutely and that all information pertaining to any prescriptions the children may be on is exchanged between the parties.

2. Father shall enjoy primary physical custody of their minor child KATLYN GRAHAM subject to Mother's periods of partial custody as the parties may agree.

3. Mother shall enjoy primary physical custody of their minor child MICHELLE GRAHAM subject to Father's periods of partial custody as the parties may agree.

4. Either party may request this matter to be scheduled for mediation conference before Dr. Allen Ryen, Ph.D.

BY THE COURT,

/s/ Paul E. Cherry
Judge

J

We, the undersigned, do hereby consent to the entry of the foregoing Order.

Bruce Graham

BRUCE ALLEN GRAHAM

Plaintiff

April Graham

APRIL GRAHAM

Defendant

R. Milgrub

RICHARD H. MILGRUB, ESQ.

Attorney for Plaintiff

I, Bruce Allen Graham , verify that the statements made in the Petition are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: 6/1/09

Bruce Graham

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
109 NORTH BRADY STREET
DUBOIS, PA 15801

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

ORDER

AND NOW, this 3rd day of June, 2009, upon
consideration of the Plaintiff's Petition for Modification of
Custody Consent Order, it is hereby ORDERED and DECREED that
hearing on said Petition be scheduled for the 9th day of
July, 2009 at 2 : 15 p.m. in Courtroom 2 of
the Clearfield County Courthouse, Clearfield, Pennsylvania.

1 hour(s) has/have been allotted for said hearing.

BY THE COURT:

Paul E. Cherry
Judge

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

FILED *100*
07/03/2009 *Att'y Milgrub*
JUN 03 2009
William A. Shaw
Prothonotary/Clerk of Courts
(61)

FILED

JUN 03 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 6/3/09

You are responsible for serving all appropriate parties.

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

Plaintiff(s) Plaintiff(s)' Attorney Other

Defendant(s) Defendant(s)' Attorney

Special Instructions:

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

BRUCE ALLEN GRAHAM,
Plaintiff

*

*

*

-vs-

* No. 2004-1427-CD

*

*

APRIL GRAHAM,
Defendant

*

Type of Pleading:
Affidavit of Service

Filed on Behalf of:
Plaintiff

Counsel of Record for this
Party:

Richard H. Milgrub, Esq.
Supreme Court I.D. 19865

211 North Second Street
Clearfield, PA 16830
(814) 765-1717

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

FILED NO CC
06/18/2005
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William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM, *
Plaintiff *
*
-vs- * No. 2004-1427-CD
*
APRIL GRAHAM, *
Defendant *

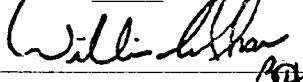
AFFIDAVIT OF SERVICE

Richard H. Milgrub, attorney for Plaintiff, being duly
sworn according to law, deposes and states that a certified copy
of the Petition for Modification of Custody Consent Order and
Order scheduling hearing for July 9, 2009 at 2:15 p.m. was served
upon the Defendant by certified mail, return receipt requested on
June 15, 2009 at the Defendant's residence of 111 North Findley
Street, Apartment 404, Punxsutawney, Pennsylvania 15767, as
appears from receipt of certified mail attached hereto.



Richard H. Milgrub

SWORN and SUBSCRIBED to before me this 17th day of June, 2009.



William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

April Graham
306 S. Penn Street
Punxsutawney, PA 15767

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

X April Graham

Agent
 Addressee

B. Received by (Printed Name)

April Graham

C. Date of Delivery

16-15-09

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

111 N. Findley St Apt 404
Punxsutawney PA
15767

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

2. Article Number

(Transfer from service label)

7005 0390 0003 7231 2682

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

FILED

JUN 17 2009

William A. Shaw
Prothonotary/Clerk of Courts

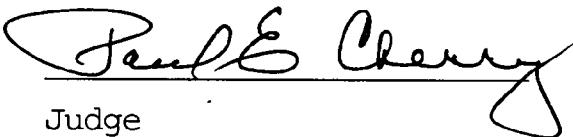
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

BRUCE ALLEN GRAHAM)
)
)
 VS.) NO. 04-1427-CD
)
)
 APRIL GRAHAM)

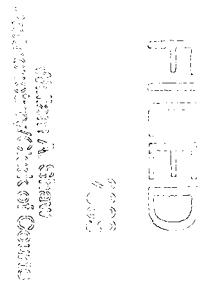
O R D E R

NOW this 10th day of July, 2009, following hearing on the Petition for Modification of Custody, and taking of testimony and in camera interview of the minor child; upon consideration of same, it is the ORDER of this Court that said Petition shall be and is hereby dismissed. The parties shall continue to follow the Consent Order dated April 21, 2009.

BY THE COURT,


Judge

FILED 2CC 04/00/09 2009
SAY Milgrub
04/00/09
2CC Def.-
William A. Shaw
Notary/Clerk of Courts
3006 South Penn St.
Punxsutawney, PA 15767



DATE: 7/10/09

_____ You are responsible for serving all appropriate parties.

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

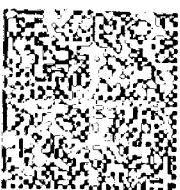
Plaintiff(s) Plaintiff(s) Attorney Other
 Defendant(s) Defendant(s) Attorney

_____ Special Instructions:

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

FILED

(64)
JUL 24 2009
11/10/2010
William A. Shaw
Prothonotary/Clerk of Courts



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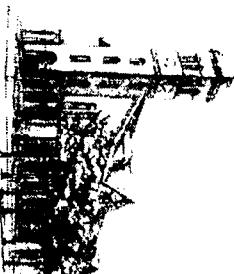
April Graham
306 South Penn Street
Punxsutaw

NIXIE 165 5E 1 00 07/22/09

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

BC: 16830054949 *1173-23208-13-99
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Clearfield County Office of the Prothonotary and Clerk of Courts



William A. Shaw
Prothonotary/Clerk of Courts

Jacki Kendrick
Deputy Prothonotary/Clerk of Courts

Bonnie Hudson
Administrative Assistant

David S. Ammerman
Solicitor

PO Box 549, Clearfield, PA 16830 • Phone: (814) 783-2541 (x. 1330) • Fax: (814) 783-1889 • www.clearfieldco.org

To: All Concerned Parties

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

William A. Shaw, Prothonotary

DATE: 7/10/09

 You are responsible for serving all appropriate parties.

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

 Plaintiff(s) Plaintiff(s) Attorney Other

Defendant(s) Defendant(s) Attorney

 Special Instructions:

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

BRUCE ALLEN GRAHAM)
)
)
 VS.) NO. 04-1427-CD
)
)
 APRIL GRAHAM)

O R D E R

NOW this 10th day of July, 2009, following hearing on the Petition for Modification of Custody, and taking of testimony and in camera interview of the minor child; upon consideration of same, it is the ORDER of this Court that said Petition shall be and is hereby dismissed. The parties shall continue to follow the Consent Order dated April 21, 2009.

BY THE COURT,

/s/ Paul E. Cherry

Judge

I certify that the foregoing is a true and accurate copy of the original document filed in this case.

JUL 10 2009

Attest.

William J. H.
Prothonotary/
Clerk of Courts

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

BRUCE ALLEN GRAHAM)
VS.) NO. 04-1427-CD
APRIL GRAHAM)

ORDER

NOW this 10th day of July, 2009, following hearing on the Petition for Modification of Custody, and taking of testimony and in camera interview of the minor child; upon consideration of same, it is the ORDER of this Court that said Petition shall be and is hereby dismissed. The parties shall continue to follow the Consent Order dated April 21, 2009.

BY THE COURT,

Is/ Paul E. Cherry

Judge

I hereby certify this to be a true
copy of the original
document hereto attached.

JUL 10 2003

A. 49. 1. 1. 1. 1.

Richard H. Moore
President of the
Society for the Advancement