

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

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

LYNN A. MYERS and
KATHI J. MYERS,

Plaintiffs

vs.

JERRY A. MILES and
JERRY A. MILES, JR.,

Defendants

No. 04-1426-2

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 *cc*
9/30/04
SEP 15 2004 *Att'y Hopkins*
2cc SHF
William A. Shaw
Prothonotary/Clerk of Courts *Att'y 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 attorneys, Hopkins Heltzel LLP, and says as follows:

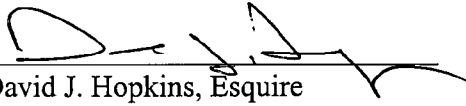
1. Plaintiffs, Lynn A. Myers and Kathi J. Myers, are husband and wife, who reside at 342 Kilmer Road, DuBois, Pennsylvania 15801.
2. Defendant Jerry A. Miles and Defendant Jerry A. Miles, Jr. are adult individuals who maintain a business address at Top of the Line Motors, Inc., 640 East Brady Street, 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

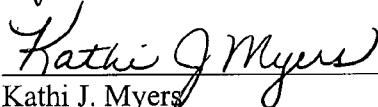
I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.

September 14, 2004



Lynn J. Myers

September 14, 2004



Kathi J. Myers

PROMISSORY NOTE

\$ 16,500.00

Dated: MARCH 27

, 2004 year)

Principal Amount

State of PENNA

FOR VALUE RECEIVED, the undersigned hereby jointly and severally promise to pay to the order of LYNN A. MYERS AND MATH J. MYERS 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 24, 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.

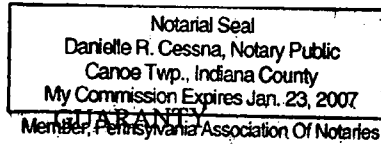
The undersigned and all other parties to this note, whether as endorsers, guarantors or sureties, agree to remain fully bound hereunder until this note shall be fully paid and waive demand, presentment and protest and all notices thereto and further agree to remain bound, notwithstanding any extension, 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

[Signature]
Borrower
[Signature]
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

Witness

Guarantor

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

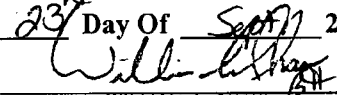
NOW SEPTEMBER 20, 2004 AT 10:18 AM SERVED THE WITHIN COMPLAINT ON JERRY A. MILES JR., DEFENDANT AT EMPLOYMENT, 640 S. BRADY ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JERRY A. MILES JR. A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

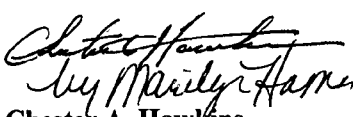
Return Costs

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 2004

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

So Answers,


Chester A. Hawkins
Sheriff

FILED

018:56:01
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.,

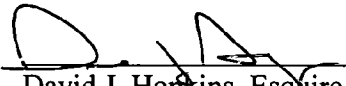
Defendants

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	58.62
Total	\$18,643.62


David J. Hopkins, Esquire
Attorney for Plaintiffs

Att. pd. 2000
10/22/04 Notice to Defs
EVE OCT 28 2004 Statement to Att. J

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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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.

JERRY A. MILES and
JERRY A. MILES, JR.,

Defendants

No. 04-1426 C.D.

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.

Prothonotary

10/28/04

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

LYNN A. MYERS and
KATHI J. MYERS,

Plaintiffs

vs.

JERRY A. MILES and
JERRY A. MILES, JR.,

Defendants

No. 04-1426 C.D.

JUDGMENT NOTICE

TO: Jerry A. Miles

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against you in the amount of \$18,643.62.

Prothonotary

10/28/04

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

LYNN A. MYERS and
KATHI J. MYERS,

Plaintiffs

vs.

JERRY A. MILES and
JERRY A. MILES, JR.,

Defendants

No. 04-1426 C.D.

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.

Prothonotary

10/28/04

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

COPY

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 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
KATHI J. MYERS,

Plaintiffs

v.

JERRY A. MILES and JERRY A.
MILES, JR. and TOP OF THE LINE
MOTORS, INC.,

Defendants

Case No. 04-1426-CD

**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

FILED ^{no cc}
m/11:32AM
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.
Debtor,

Bankruptcy No.: 04-34143 BM

JERRY A. MILES, JR.
Movant,

Chapter 7

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

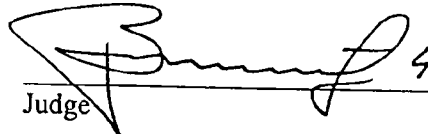
October 27, 2004

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
KATHI J. MYERS,

Plaintiffs

v.

JERRY A. MILES and JERRY A.
MILES, JR. and TOP OF THE LINE
MOTORS, INC.,

Defendants

Case No. 04-1426-CD

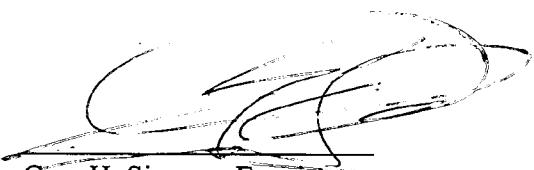
CERTIFICATE OF SERVICE

I, Gary H. Simone, Esquire, hereby certify that a true and correct copy of the Praecipe 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. J.
Prothonotary/Clerk of Courts

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

LYNN A. MYERS and
KATHI J. MYERS,

Plaintiffs

v.

JERRY A. MILES and JERRY A.
MILES, JR. and TOP OF THE LINE
MOTORS, INC.,

Defendants

Case No. 04-1426-CD

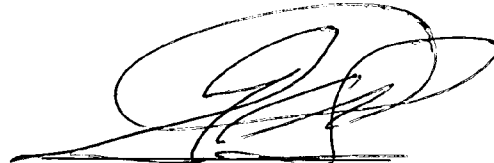
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Lien Avoidance was sent by United States Mail, postage prepaid, to the following:

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

Date: 4-19-05

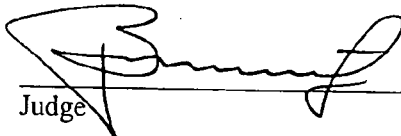


Gary H. Simone, Esquire
RISHOR SIMONE
Suite 208, 101 E. Diamond
Butler, PA 16001
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Ritzie

Lynn A. Myers and Kathi J. Myers	October 28, 2004	2004-1426 CD \$18,643.62
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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.
Debtor,

JERRY A. MILES, JR.
Movant,

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

Bankruptcy No.: 04-34143 BM

Chapter 7

Document No.: 13

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**

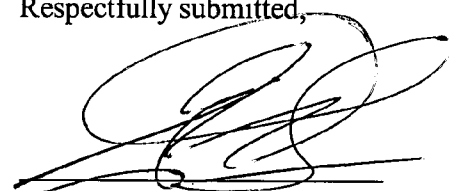
LYNN A. MYERS and	:	Case No. 04-1426-CD
KATHI J. MYERS,	:	
Plaintiffs	:	
	:	
v.	:	
	:	
JERRY A. MILES and JERRY A.	:	
MILES, JR. and TOP OF THE LINE	:	
MOTORS, INC.,	:	
Defendants	:	

**PRAECIPE TO DOCKET BANKRUPTCY
LIEN AVOIDANCE ORDER**

TO: The Prothonotary:

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Respectfully submitted,



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

FILED *no*
m 11:33 *cc*
APR 25 2005
Prod
William A. Shaw
Prothonotary/Clerk of Courts

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

Bruce Allen Graham vs .April Graham

Divorce with Custody

Date	Judge
9/15/2004	No Judge
Filing: Divorce Complaint Additional Counts Paid by: Milgrub, Richard H. Receipt number: 1886562 Dated: 09/15/2004 Amount: \$10.00 (Check)	
✓ Filing: Divorce Complaint with Custody Count Paid by: Milgrub, Richard H. Receipt number 1886562 Dated: 09/15/2004 Amount: \$105.00 (Check) 1 Cert. to Atty.	No Judge
9/17/2004	Paul E. Cherry
✓ Order Of Court, You, April Graham, Defendant, have been sued in Court to 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	Paul E. Cherry
✓ Affidavit of Service filed on behalf of Plaintiff, Complaint in Divorce and Order 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	Paul E. Cherry
✓ 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: (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	Paul E. Cherry
✓ Praecipe to Transmit Record, filed by s/Richard H. Milgrub, Esq. No CC	
✓ Property Settlement Agreement, filed. s/Bruce Allen Graham s/April Graham Two CC Attorney Milgrub	Paul E. Cherry
3/14/2005	Paul E. Cherry
✓ Divorce Decree/Dated: March 14, 2005. BY THE COURT: /s/Paul E. Cherry Judge March 31, 2005, Vital Statistics information reported to New Castle, PA. Two CC Decrees to Attorney Milgrub	
5/2/2005	Paul E. Cherry
✓ Petition For Modification, filed by s/ Richard H. Milgrub, Esquire. 1CC Atty. Milgrub	
• 9/6/2005	Paul E. Cherry
✓ Praecipe to Withdraw Petition for Modification, filed by Atty. Milgrub no cert. copies.	
9/7/2005	Paul E. Cherry
✓ Petition for Modification, filed by Atty. Milgrub 1 Cert. to Atty.	
9/13/2005	Paul E. Cherry
✓ Rule, NOW, this 12th day of Sept., 2005, upon consideration of the Plaintiff's 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	
9/14/2005	Paul E. Cherry
✓ Petition For Continuance, filed by s/ Richard H. Milgrub, Esquire. 1CC atty	
9/16/2005	Paul E. Cherry
✓ 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

Juror#	Juror Name	Address Line 1	Address Line 2	Address Line 3
172	4613 MOSCO, JOHN A JR	1358 TREASURE LAKE	DUBOIS PA 15801	
173	4066 MOSLAK, ELLA	4222 MORRISDALE ALLPORT HWY	MORRISDALE, PA. 16858	
174	1705 MOYER, LETAM	320 SPRING ST	HOUTZDALE PA 16651	
175	4165 MULLINS, DENNIS	333 MATHEWS ROAD	GRAMPIAN PA 16838	
176	3594 NAREHOOD, WILLIAM	837 MARKET ST	P.O. BOX 64	KARTHAIUS PA 16845
177	464 NEFF, KAREN A	P.O. BOX 162	CURWENSVILLE, PA 16833	
178	1724 NELSON, MARTHA A	2319 WHIPPERS RD	FALLEN TIMBER PA 16639	
179	763 NELSON, WENDY	19 LORD ST	DUBOIS PA 15801	
180	3850 MORRIS, CAROL	1320 TURNPIKE AVE	CLEARFIELD PA 16830	
181	1742 ORWICK, FRANCES V	44 CEMETARY RD	MORRISDALE PA 16858	
182	4633 OWENS, VELMA M	2675 DEHRINGER HWY	REYNOLDSVILLE PA 15805	
183	3043 PAISLEY, DEBORAH	P O BOX 147	GRASSFLAT PA 16839	
184	3200 PALLO, FRANCIS J JR	725 PADER RD	PHILIPSBURG PA 16866	
185	271 PARKS, MARGARET	402 E 11TH ST	CLEARFIELD PA 16830	
186	1769 PENNY, ELSIE	505 HALE ST	OSCEOLA MILLS PA 16666	
187	1016 PENTZ, THOMAS L	7120 LUMBER CITY HWY	CURWENSVILLE PA 16833	
188	783 PIERCE, JAMIE	12 HOPE ST	DUBOIS PA 15801	
189	1782 POFFA, ANTHONY	33 CECIL HURD HWY	P.O. BOX 104	LAJOSE PA 15753
190	4653 PORRIN, T	31 HANES DRIVE APT 74	DUBOIS PA 15801	

Date: 7/13/2009

Clearfield County Court of Common Pleas

User: LMILLER

Time: 11:00 AM

ROA Report

Page 2 of 2

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 Contempt 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 South Penn Street, Punxsutawney, PA 15767	Paul E. Cherry
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

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 2
Address Line 3

Juror#	Juror Name	Address Line 1	Address Line 2	Address Line 3
191	3869 PRICE, TAMMY A	BOX 75	CLEARFIELD PA 16830	
192	1034 PUFF, JOHN	31 SHEFFIELD ST	MAHAFFEY PA 15753	
193	1802 RANCIK, JOSEPH	BOX 74	GRAMPIAN PA 16838	
194	1821 RICE, DAVID W	96 BLANCHARD ST	OSCEOLA MILLS PA 16666	
195	4263 RICHARDS, LOIS	13068 CURWENSVILLE TYRONE HWY	CURWENSVILLE PA 16833	
196	2354 RICKETTS, EVELYN	1812 CROSSROADS DR	GOALPORT PA 16627	
197	290 RIGGOTT, SAMUEL	1000 BIGLER AVE	CLEARFIELD PA 16820	
198	3054 RIGLIN, ADAM	5412 KYLERTOWN DRIFTING HWY	DRIFTING PA 16834	
199	4674 RISHILL, LEONAE	1810 INYANIS TRAIL	DUBOIS PA 15801	
200	802 ROGERS, ALVIND	22 BUMBARGER AVE	DUBOIS PA 15801	
201	1844 ROWLES, HARRY D	576 LAWRENCE GRAANGE RD	CLEARFIELD PA 16830	
202	3889 ROWLES, RAYMOND A SR	75 GOOD STREET	CLEARFIELD PA 16830	
203	3536 RUDOLPH, ROBERT	15133 BENNETTS VALLEY HWY	PENFIELD PA 15849	
204	4087 RUSHNOCK, EDWARD	186 TRACY HILL RD	PHILIPSBURG PA 18866	
205	2712 RYEN, JOHN D	P.O. BOX 150	WOODLAND PA 16804	
206	2831 SCHAFER, DEBORAH	1447 SADDLE CLUB RD	LUTHERSBURG, PA 15848	
207	1864 SCHAFNER, MARIAN T	703 CREATION DR	DUBOIS PA 15801	
208	4694 SCHNEIDER, CATHLEEN M	290 WHITE PINE ROAD	DUBOIS PA 15801	
209	919 SELK, ELANA	68 OLD L.R. 238	P.O. BOX 33	GLENHOPE, PA 16649

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

BRUCE ALLEN GRAHAM,
Plaintiff

- vs -

APRIL GRAHAM,
Defendant

*
*
*
*
*
*
*

No. 2004-1427-CO

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

012401u
William A. Shaw
Prothonotary

1 cent to Att

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

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.
	*
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,

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".

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.

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).

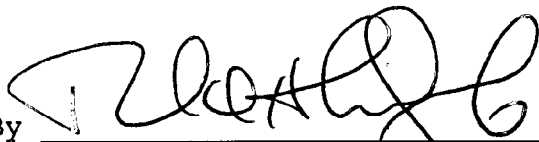
18. Plaintiff has not participated as a party, witness, or in any other capacity in any other litigation concerning the custody of the same children in this or any other state.

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

GA

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

BRUCE ALLEN GRAHAM,
Plaintiff

- vs -

APRIL GRAHAM,
Defendant

*
*
*
*
*
*

No. 2004-1427-CD

ORDER OF COURT

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

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 *ELK*
0 11:22 AM 100 City Milgrub

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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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

FILED
012:4764
SEP 22 2004

E6K
NCC

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

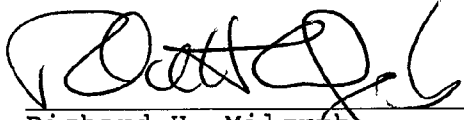
APRIL GRAHAM,
Defendant

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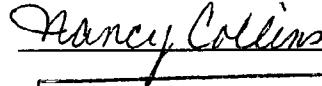
No. 2004-1427-CD

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

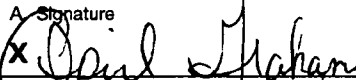
SWORN and SUBSCRIBED to before me this 20th day of September 2004.



Notarial Seal
Nancy Collins, Notary Public
Pike Twp., Clearfield County
My Commission Expires Mar. 24, 2007
Member, Pennsylvania Association of Notaries

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 THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">■ 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.		<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) April Graham</p> <p>C. Date of Delivery 20 SEP 2007</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
1. Article Addressed to: April Graham 406 East Bridge Street Westover, PA 16692		3. Service Type <input checked="" 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.	
2. Article Number (Transfer from service label)		4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes	
		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

51



IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

BRUCE ALLEN GRAHAM

:

-VS-

:

No. 04-1427-CD

APRIL GRAHAM

:

FILED 3CC
01/23/04 Amy
OCT 11 2004 milgrub
William A. Shaw (will serve 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;

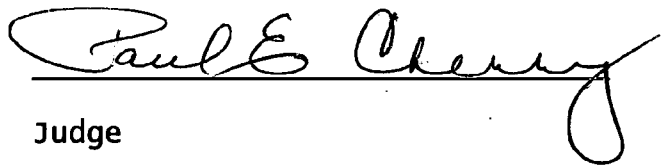
F. The party initiating physical custody shall be responsible for transportation;

G. Any and all times as the parties may agree.

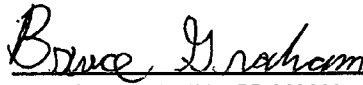
3. Father shall be entitled to reasonable telephone communication with the minor children;

4. It is specifically understood that either party may petition the Court for modification of this Order.

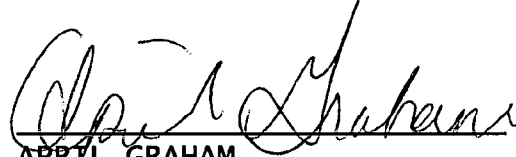
BY THE COURT,


Judge


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



BRUCE ALLEN GRAHAM
Plaintiff



APRIL GRAHAM
Defendant



Attorney for Plaintiff

FILED

OCT 11 2004

WILLIAM A. SUTHERLAND
JANUARY 11, 2004

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

BRUCE ALLEN GRAHAM,
Plaintiff

- vs -

APRIL GRAHAM,
Defendant

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*
*

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

FILED NO
01/31/05 cc
MAR 10 2005
PROthonary, Court of Appeals

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

BRUCE ALLEN GRAHAM,
Plaintiff

- vs -

APRIL GRAHAM,
Defendant

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No. 04-1427-CD

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.

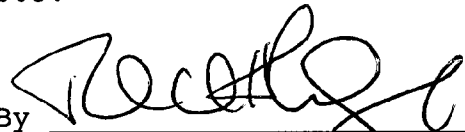
3. Date of execution of the Affidavit of Consent required by Section 3301(c) of the Divorce Code: By Plaintiff on March 8, 2005 and by Defendant on March 8, 2005.

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.

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 ACTION

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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* No. 2004-1427-CD

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-

APRIL GRAHAM,
Defendant

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* No. 2004-1427-CD

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.

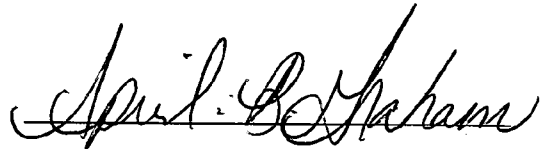
4. I understand that if a claim for alimony pendente lite, marital property or counsel fees or expenses has not been filed with the Court before the entry of a Final Decree in Divorce, the right to claim any of them will be lost.

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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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-

APRIL GRAHAM,

Defendant

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No. 2004-1427-CD

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

April B Graham

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

BRUCE ALLEN GRAHAM, *
 Plaintiff *
 *
 * 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:

(/s/ 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

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

BRUCE ALLEN GRAHAM,
Plaintiff

- vs -

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

PROPERTY SETTLEMENT AGREEMENT

THIS AGREEMENT made this 7th day of March,
2004^S, 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

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

109 NORTH BRADY STREET
DUBOIS, PA 15801

2cc
01/31/2004
Att'y M. Milgrub
Richard A. Milgrub
Prothonotary, Clerk of Courts

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

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

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

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.

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

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.

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

WITNESSED AND SWORN TO
BEFORE ME THIS 17th
DAY OF March 19 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)
COUNTY OF CLEARFIELD) SS

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.

Lois H. Lobb

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS

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

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.

Lois H. Lobb

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

109 NORTH BRADY STREET
DUBOIS, PA 15801

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

COUNTY
Clearfield

RECORD OF
DIVORCE OR ANNULMENT
☒ (CHECK ONE) ☐

STATE FILE NUMBER

STATE FILE DATE

HUSBAND

1. NAME (First) (Middle) (Last) Bruce Allen Graham	2. DATE (Month) (Day) (Year) OF 2 23 72 BIRTH
3. RESIDENCE Street or R.D. City, Boro. or Twp. County State 36 Oak Ridge Road, Madera, Clearfield Co., PA	4. PLACE (State or Foreign Country) OF Pennsylvania BIRTH
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 (First) (Middle) (Last) Mann April Beth Graham	9. DATE (Month) (Day) (Year) OF 9 18 75 BIRTH
10. RESIDENCE Street or R.D. City, Boro. or Twp. County State 406 East Bridge St., Westover, Clearfield Co., PA	11. PLACE (State or Foreign Country) OF Pennsylvania BIRTH
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 (County) (State or Foreign Country) Clearfield PA	16. DATE OF (Month) (Day) (Year) THIS 7 10 93 MARRIAGE
17A. NUMBER OF CHILDREN THIS MARRIAGE 2	17B. NUMBER OF DEPENDENT CHILDREN 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 HUSBAND <input type="checkbox"/> WIFE <input checked="" type="checkbox"/> SPLIT CUSTODY <input type="checkbox"/> OTHER (Specify) <input type="checkbox"/>	21. LEGAL GROUNDS FOR DIVORCE OR ANNULMENT 3301(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 fr.
who is
pleading for knowledge.
Please file

Thanks!
W

CA

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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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
012:28811
SEP 02 2005
1cc
Att'y M. Milgrub
@

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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No. 04-1427-CD

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 Petitioners willing to share the savings for the second deduction with the Respondent.

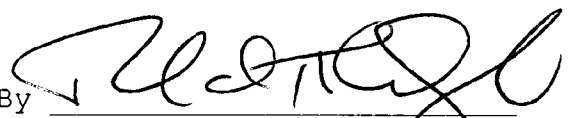
6. Your Petitioner requests that as long as it is financially advantageous that he be allowed to take both deductions with Petitioner and Respondent sharing the savings on the second deduction.

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

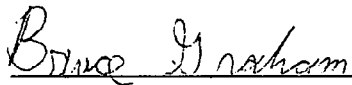
hereby certify this to be a true
and attested copy of the original
judgment and order of the Court

OCT 11 2004

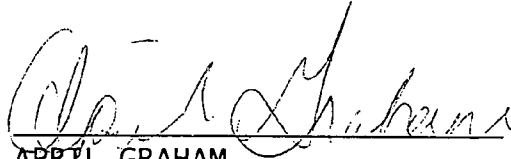
Attest

Elizabeth J. Cherry
Clerk of Court

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



BRUCE ALLEN GRAHAM
Plaintiff



APRIL GRAHAM
Defendant



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

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

FILED

SEP 02 2005

William A. Shaw
Prothonotary/Clerk of Courts

CH

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

BRUCE ALLEN GRAHAM,
Plaintiff

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-vs-

No. 04-1427-CD

APRIL GRAHAM,
Defendant

Type of Action:
Custody

Type of Pleading:
Praecipe 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

0/2:45/6

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-

APRIL GRAHAM,
Defendant


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No. 04-1427-CD

PRAECIPE 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

WANCY KNOW'S

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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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
6/21/05
William A. Shaw
Prothonotary/Clerk of Courts
1 SENT TO ATTY

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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*
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No. 04-1427-CD

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.

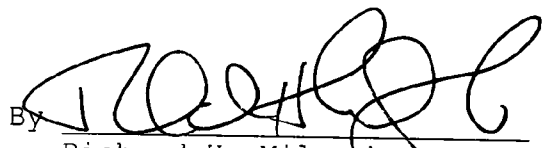
4. That pursuant to a Property Settlement Agreement, each party is entitled to one minor child's tax deduction.

5. That it is more financially advantageous to Your Petitioner to have both deductions and Your Petitioners 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

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COURT OF APPEALS
JUL 10 1994

JUL 10 1994

JUL 10 1994
COURT OF APPEALS

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: 3/21/05

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 of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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No. 04-1427-CD

AND NOW, this 12th RULE 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

9/13/05 2:43 PM 2005/09/13 milgrub
SEP 13 2005 milgrub

CR

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

CA

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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No. 04-1427-CD

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

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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-

APRIL GRAHAM,
Defendant

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No. 04-1427-CD

PETITION FOR CONTINUANCE

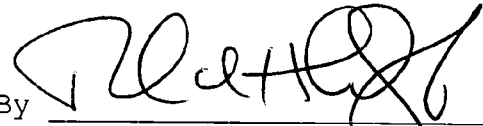
AND NOW, comes Your Petitioner, Bruce Allen Graham, by
and through his attorney, Richard H. Milgrub, who files the
following Motion for Continuance:

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

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. Snow
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

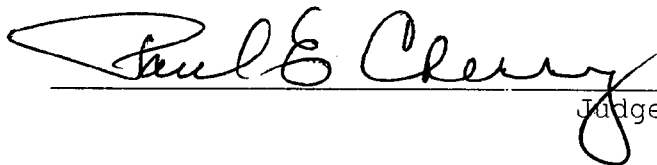
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No. 04-1427-CD

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:


Judge

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

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED ^{cc}
01/10/06/01 Amy Milgrub
SEP 16 2005 @

William A. Shaw
Prothonotary/Clerk of Courts

FILED

SEP 16 2005

CLERK OF COURT
PROBATION DEPARTMENT OF CORRECTIONS

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

BRUCE ALLEN GRAHAM,
Plaintiff

vs

APRIL GRAHAM,
Defendant

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No. 04-1427-CD

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

FILED
02:46 PM
SEP 28 2005
cc

William A. Blum
Prothonotary, Court of Records

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

BRUCE ALLEN GRAHAM,
Plaintiff

vs

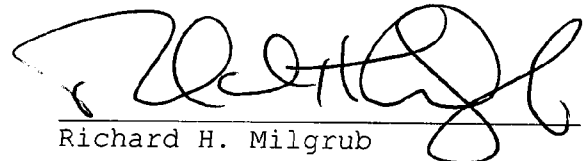
APRIL GRAHAM,
Defendant

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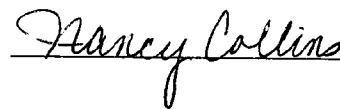
No. 04-1427-CD

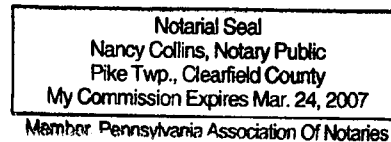
AFFIDAVIT OF SERVICE

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.





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)

C. Date of Delivery

April Graham *9/26/05*

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

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

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p10:3501 mlg
NOV 02 2005
William A. Shaw
Prothonotary/Clerk of Courts
Def: 406 E. Bridge St
Westover, PA 16803
(6)

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

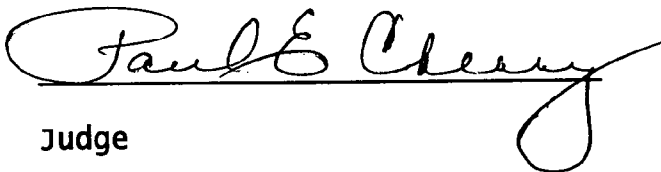
adult designee, with the designee being required to have an established relationship with the children;

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.

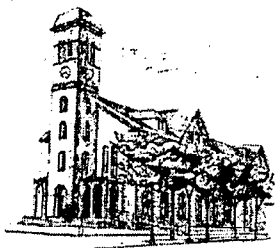
BY THE COURT,


Judge

FILED

NOV 02 2003

WILLIAMSON
PROBATE COURT



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.

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

 X Plaintiff(s)/Attorney(s)

 X Defendant(s)/Attorney(s)

_____ Other

_____ Special Instructions:

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

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MAR 31 2009 @K

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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*
*
*

William A. Shaw
Prothonotary/Clerk of Courts

No. 2004-1427-CD

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 :

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

NOTED, FILED, and the case is
sent to the court clerk for
the court's review.

NOV 11 2004

CLERK
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 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

This document is to be a true
and correct copy of the original
as filed with the court.

NOV 02 2005

APR

11/2/05
Paul E. Cherry

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

LA

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

FILED ICC Atty
9 10:30am Milgrub
MAR 11 2005

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

*
*
*
*
*
*

William A. Shaw
Prothonotary/Clerk of Courts
No. 2004-1427-CD

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

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

NOTED FOR COURT OF APPEALS
AND THE COURT OF APPEALS
JULY 10 1994

NOTED FOR COURT

NOTED FOR COURT

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 02 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

LA

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

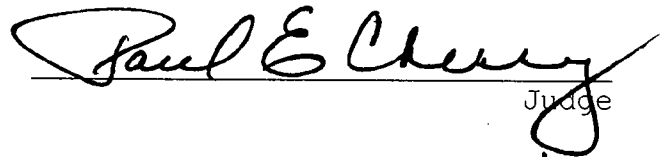
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No. 2004-1427-CD

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:


Judge

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

109 NORTH BRADY STREET
DUBOIS, PA 15801

FILED ^{1cc}
011102304 Atty Milgrub
APR 01 2009
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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

5
FILED
014:00801
APR 02 2009
William A. Shaw
Prothonotary/Clerk of Courts

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:

April 2, 2009

Paul E. Cherry
Judge

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

Bondy J. 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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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. CC-
0/11:30am
APR 14 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-

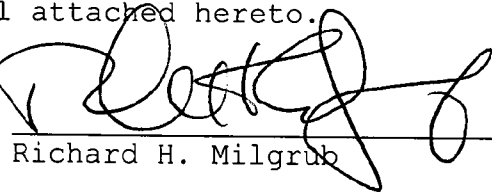
APRIL GRAHAM,
Defendant

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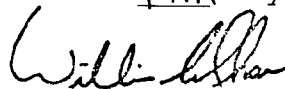
No. 2004-1427-CD

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.



cm

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**

X *April Peace*

- ☐ Agent
☐ Addressee

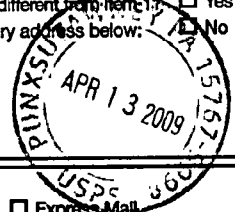
B. Received by (Printed Name)

April Peace

C. Date of Delivery

- D. Is delivery address different from item 1?**
If YES, enter delivery address below:

- ☐ Yes
☒ 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 1 / 2009

William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM }

VS }

APRIL GRAHAM }

NO. 2004-1427-CD

FILED

APR 21 2009

0/4:00 PM

William A. Shaw
Prothonotary/Clerk of Courts

Clerk to

MUGNIB &

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.

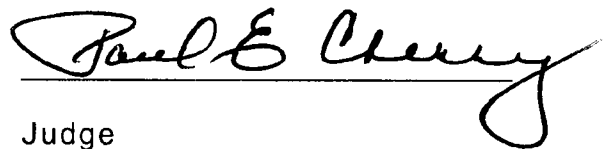
It is understood by both parents that they shall communicate fully with each other in an effort to ensure that all directives pertaining to the minor children from physicians, dentists and teachers are followed absolutely and that all information pertaining to any prescriptions the children may be on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

A handwritten signature in cursive script, reading "Paul E. Cherry". The signature is written in dark ink and is positioned above a horizontal line.

Judge

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

Bruce Graham

BRUCE ALLEN GRAHAM

Plaintiff

April Graham
Peace

APRIL GRAHAM

Defendant

Richard H. Milgrub

RICHARD H. MILGRUB, ESQ.

Attorney for Plaintiff

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

April Grawner
 406 E. BRIDGE ST.
 WINTHROP, PA. 16692

FILED
 APR 21 2009
 William A. Shaw
 Probationary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

Type of Pleading:
Praecipe 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 ^{ICC}
01/0730/
APR 22 2009 *Rich Milgrub*

S
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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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
P.O. BOX 549
FIELD, PENNSYLVANIA

APR 27 2009

William A. Shaw
Prothonotary/Clerk of Courts

remailed to
306 South Penn St.
Punkstutawney PA
15767

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

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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
Peace

APRIL GRAHAM

Defendant

Richard H. 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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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 *cc:att*
01/2:15cm *milgrub*
JUN 02 2009 *WR*

⚡
William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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;

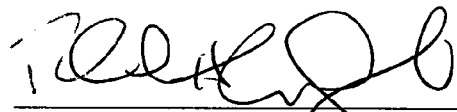
f. the Respondent and her live-in paramour are separated; and

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

13. 14. 15.

O R D E R

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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



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

+ Bruce A. Graham

BRUCE ALLEN GRAHAM

Plaintiff

April Graham
APRIL GRAHAM
Pearce

Defendant

Richard H. 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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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

FILED

JUN 03 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 6/13/09

☒ 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-

APRIL GRAHAM,
Defendant

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No. 2004-1427-CD

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
0/21834
JUN 17 2008
William A. Shaw
Prothonotary/Clerk of Courts

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

BRUCE ALLEN GRAHAM,
Plaintiff

-vs-

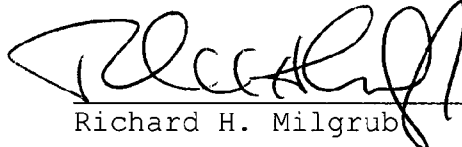
APRIL GRAHAM,
Defendant

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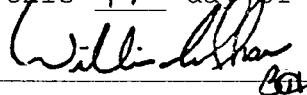
No. 2004-1427-CD

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.


W. 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

2. Article Number

(Transfer from service label)

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

April Graham

☐ Agent☐ Addressee**B. Received by (Printed Name)**

April HEACE

C. Date of Delivery

6-15-09

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

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.

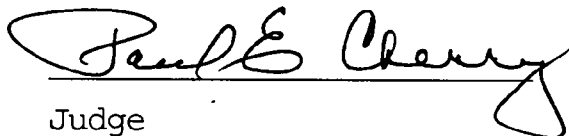
APRIL GRAHAM

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) NO. 04-1427-CD
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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
07/14/09 14:00
JUL 14 2009
William A. Shaw
Prothonotary/Clerk of Courts
2cc Def.-
300 South Penn St.
Punxsutawney, PA 15767

FILED

2009
4-20-09

CLARENCE A. STACY
JULY 2009 OFFICE OF CLARENCE

DATE: 7/10/09

☐ You are responsible for serving all appropriate parties.

☒ The Probationary'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

JUL 24 2009

William A. Shaw

Prothonotary/Clerk of Courts

April Graham
306 South Penn Street
Punxsuta



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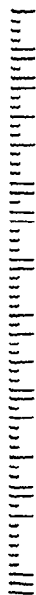
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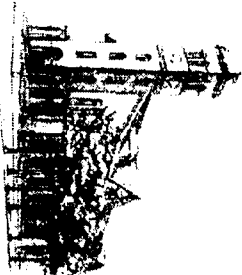
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RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

BC: 16830054949 *1173-23208-13-39

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Clearfield County Office of the Prothonotary and Clerk of Courts

William A. Shaw **Jacki Kendrick** **Bonnie Hudson** **David S. Ammerman**
Prothonotary/Clerk of Courts Deputy Prothonotary/Clerk of Courts Administrative Assistant Solicitor

PO Box 549, Clearfield, PA 16830 • Phone: (814) 765-2641 fax: 1330 • fax: (814) 765-7503 • 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.

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

 Plaintiff(s) X Plaintiff(s) Attorney Other

 X Defendant(s) Defendant(s) Attorney

 Special Instructions:

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

BRUCE ALLEN GRAHAM

VS.

APRIL GRAHAM

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) NO. 04-1427-CD
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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

*In compliance with the rules of the
court, the undersigned has filed the original
document filed in this case.*

JUL 10 2009

Attest.

William E. Cherry
Prothonotary/
Clerk of Courts

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

BRUCE ALLEN GRAHAM

VS.

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BY THE COURT,

/s/ Paul E. Cherry

Judge

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

JUL 10 2009

Attest:

William A. Berry
Clerk of Courts