

08-1514-CD
In Re: Reagan Nichole Coleman

ORIGINAL

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

IN RE:

RAEGAN NICHOLE COLEMAN
D.O.B. April 25, 2002

No. 08-1514-CD

Type of case: Civil

Type of pleading: **PETITION
FOR CHANGE OF NAME**

Filed on behalf of: Scott Peters

Counsel for Petitioner:
Courtney L. Kubista, Esquire
Supreme Court No. 91244

NEISWENDER & KUBISTA
211½ North Second Street
Clearfield, Pennsylvania 16830
(814) 765-6500

FILED *408*
08/13/2008 *Atty C Kubista*
AUG 14 2008
William A. Shaw
Prothonotary/Clerk of Courts
Atty pd \$95.00

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

IN RE: :

RAEGAN NICHOLE COLEMAN : No.
D.O.B. April 25, 2002 :
: :
: :
: :

NOTICE TO DEFEND

A Petition or Motion has been filed against you in court. If you wish to defend against the claims set forth in the following pages, you must take action before the date set forth in the Rule Returnable 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 order may be entered against you by the court without further notice for the relief requested by the Petitioner. You may lose 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.

COURT ADMINISTRATOR
1 North Second Street
Clearfield, Pennsylvania 16830
(814) 765-2641

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

IN RE:

RAEGAN NICHOLE COLEMAN : No.
D.O.B. April 25, 2002 :
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PETITION FOR CHANGE OF NAME

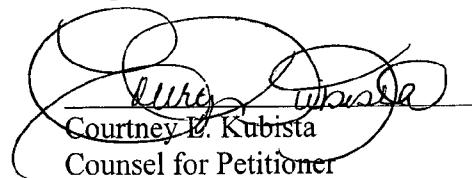
AND NOW, comes your Petitioner, Scott Peters, by and through his attorneys, NEISWENDER & KUBISTA and sets forth the following Petition for Change of Name, and in support thereof would aver as follows:

1. That Petitioner is Scott Peters, an adult individual currently residing at 321 Alton Street, Apartment 3, Danville, Pennsylvania 17821.
2. That the Petitioner is the natural father of Raegan Nichole Coleman, born April 25, 2002.
3. That the natural mother of Raegan Nichole Coleman is Jessica Coleman currently residing at 60 Redwood Drive, Penfield, Clearfield County, Pennsylvania 15849.
4. That upon the child's birth, Raegan Nichole Coleman was given the name of her natural mother.
5. That the Petitioner and Respondent were never married.
6. That there is a Custody Order in effect dated May 12, 2008, wherein Paternal Grandparents, John and Gale Peters were granted primary physical custody subject to periods of custody with natural father, Scott Peters and maternal grandmother, Susan J. Dale. *Attached hereto and marked Exhibit A is a copy of the said Custody Order.*
7. That Respondent, Jessica Coleman does not have contact with the child.

8. That the child is closely bonded with your Petitioner and the members of his family whom have the surname Peters.
9. That the Petitioner is desirous of legally changing the name of Raegan Nichole Coleman to Raegan Nichole Peters in order that the child bear her natural father's name.
10. That the natural father, Petitioner herein took affirmative steps to establish custodial rights to the child.
11. That the best interest of the child would be served by the child having the last name of her biological father and the paternal grandparents who have primary physical custody of the child.
12. That Paternal Grandparents and Respondent are in agreement with the child's name being changed to Raegan Nichole Peters.
13. That there are no judgments or decrees of record or any other matter of like character against Raegan Nichole Coleman.

WHEREFORE, Petitioner, Scott Peters respectfully requests Your Honorable Court pursuant to Act of December 16, 1982, P.L. 1309 No. 295 Section 2 (54) Pa. C.S.A. Section 701, to set a hearing on this Petition and direct that notice be given of filing of this Petition and the Hearing for purposes of considering a decree to change the name of Raegan Nichole Coleman to Raegan Nichole Peters.

Respectfully Submitted,



Courtney E. Kubista
Counsel for Petitioner

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

SUSAN J. DALE, :
Plaintiff, :
vs. :
No. 2002-1075-CD
JESSICA COLEMAN, :
Defendant, : I hereby certify this to be a true
vs. : and attested copy of the original
: statement filed in this case.
SCOTT PETERS, :
Defendant. :
Attest. :
MAY 13 2008

William A. Brown
Prothonotary/
Clerk of Courts

ORDER

AND NOW, this 12th day of May, 2008, upon the
agreement of the parties, it is ORDERED as follows:

1. John Peters and Gale Peters, (Paternal Grandparents), Susan J. Dale (Maternal Grandmother) and Scott Peters (Father) shall share joint legal custody of the minor child, Raegan Nichole Coleman, born August 25, 2002. Shared legal custody is defined as the legal right to make major decisions affecting the best interests of the child, including, but not be limited to, the right of the parties to obtain, upon request, report cards and other relevant information concerning the progress of the child in school as well as all medical, dental, ocular, psychological and counseling information pertaining to the child. A copy of this Order shall be sufficient to enable any school official and any medical, dental, ocular, psychological or counseling provider to release information or copies thereof to either party. It is understood that this paragraph shall in no way delay the parent having custody to seek emergency medical treatment for the child. In the event that the child should become ill or injured to the extent that she would require medical treatment by a doctor or hospital, the party in possession shall

immediately notify the other party of the situation. In addition, it is understood by both parents, that they shall communicate fully with the other in an effort to assure that all directives pertaining to the minor child from physicians, dentists, and teachers are followed absolutely and all information pertaining to any prescriptions the child is taking is exchanged between the parties.

2. The Paternal Grandparents, John Peters and Gale Peters shall have primary physical custody of the minor child subject to the Maternal Grandmother, Susan J. Dale's periods of partial custody as follows:

- a) Every Tuesday from 3:00 p.m. to 6:30 p.m.;
- b) Every other weekend from Friday at 3:00 p.m. to Sunday at 4:00 p.m.; and
- c) At other times as the parties may agree.

3. The Paternal Grandparents, John Peters and Gale Peters shall have primary physical custody of the minor child subject to the Father, Scott Peter's periods of partial custody as follows:

- a) Every Tuesday from 6:30 p.m. to Friday at 3:00 p.m.; and
- b) At other times as the parties may agree.

4. The Maternal Grandmother and Father shall appropriately supervise the minor child at all times during their periods of partial custody.

5. Unless otherwise agreed upon by the parties, the parties shall share transportation in that the party who is to obtain custody of the child shall provide transportation.

6. The parties shall have reasonable telephone contact with the child while in the custody of the other party.

7. The parties shall keep each other informed of any changes in address or telephone numbers within 48 hours.

8. Neither party shall consume any illegal drugs or alcohol during their periods of custody.

9. The parties nor members of their extended families shall malign or speak in a derogatory manner about the other party in the presence of the child nor will he or she permit anyone else to do so. Each party will exercise his or her best efforts to promote a healthy relationship between the child and the other parent and the other parent's family. The parties are directed to conduct themselves in a reasonable and appropriate manner at all times during their interactions with each other and their family members concerning the custody of the child and issues relating to the child's care and nurturance. Further, neither party shall be permitted to discuss custodial or other adult matters with the child.

10. The parties are to be notified immediately by one another of any medical emergency concerning the child.

BY THE COURT

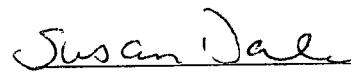
/s/ Paul E. Cherry

Judge

We, the undersigned, consent to the entry of the foregoing Consent Order.



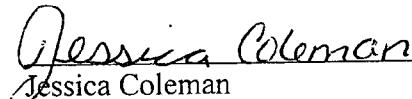
John Peters



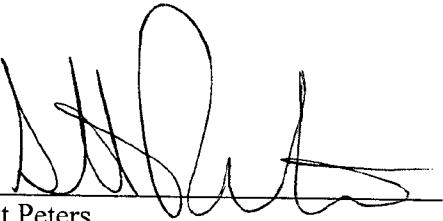
Susan Dale



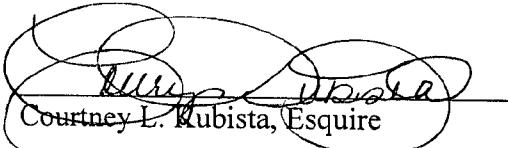
Gale Peters



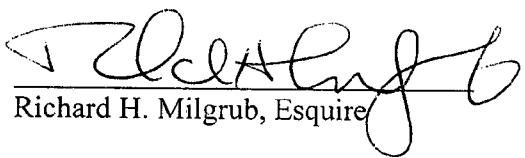
Jessica Coleman



Scott Peters



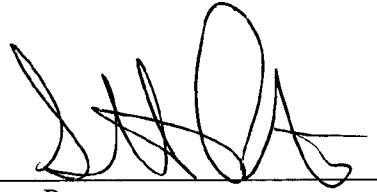
Courtney L. Kubista, Esquire



Richard H. Milgrub, Esquire

SCOTT PETERS hereby states that he is the Petitioner in this action and that the statements of fact made in the foregoing PETITION FOR CHANGE OF NAME are true and correct upon personal knowledge. The undersigned understands that the statements herein are made subject to the penalties of 18 Pa.C.S.A. § 4904, relating to unsworn falsification to authorities.

DATE: 8-8-08



Scott Peters

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

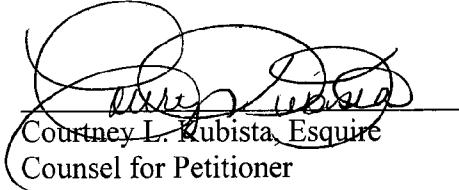
IN RE: :

RAEGAN NICHOLE COLEMAN : No.
D.O.B. August 25, 2002 :
: :
: :

CERTIFICATE OF SERVICE

I, Courtney L. Kubista, Esquire, hereby certify that service of the foregoing Petition For Change of Name, was made upon Jessica Coleman by mailing, first class, postage prepaid, and by certified restricted mail a true copy to her on August 14, 2008, at the following address:

Jessica Coleman
60 Redwood Drive
Penfield, Pennsylvania 15849


Courtney L. Kubista, Esquire
Counsel for Petitioner

NEISWENDER & KUBISTA
211½ North Second Street
Clearfield, Pennsylvania 16830

ORIGINAL

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

IN RE:

RAEGAN NICHOLE COLEMAN
D.O.B. April 25, 2002

: No. 2008-1514 CD

: Type of case: Civil

: Type of pleading: AMENDED
: CERTIFICATE OF SERVICE

: Filed on behalf of: Petitioner,
: Scott Peters

: Counsel for Petitioner:
: Courtney L. Kubista, Esquire
: Supreme Court No. 91244

: NEISWENDER & KUBISTA
: 211 1/2 North Second Street
: Clearfield, Pennsylvania 16830
: (814) 765-6500

FILED 3cc
03-17-2008 Atty
AUG 15 2008
William A. Shaw
Kubista
Prothonotary/Clerk of Courts

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

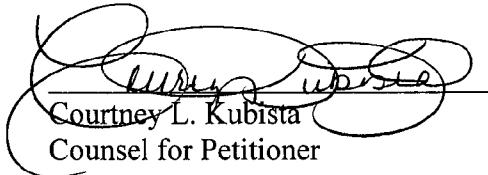
IN RE:

RAEGAN NICHOLE COLEMAN : No. 2008-1514
D.O.B. April 25, 2002 :
: :
: :
: :

AMENDED CERTIFICATE OF SERVICE

I, Courtney L. Kubista, Esquire, hereby certify that service of the foregoing Petition for Change of Name was made upon Jessica Coleman by mailing first class, postage prepaid and by certified restricted mail a true copy to her on August 15, 2008, at the following address:

Jessica Coleman
60 Redwood Drive
Penfield, PA 15849



Courtney L. Kubista
Counsel for Petitioner

NEISWENDER & KUBISTA
211 ½ North Second Street
Clearfield, PA 16830

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

IN RE:

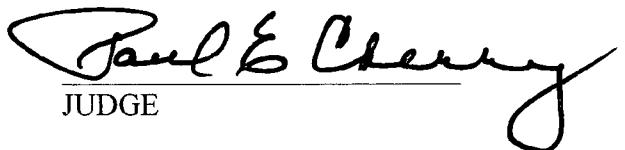
RAEGAN NICHOLE COLEMAN : No. 08-1514-CJ
D.O.B. April 25, 2002

ORDER

AND NOW, this 18th day of August, 2008, upon consideration of the foregoing Petition, a hearing on the Petition of Scott Peters for the change of name of his daughter, Raegan Nichole Coleman, is set for the 15th day of September, 2008, at 10:00A.M. in Courtroom No. 2 of the Clearfield County Courthouse, Clearfield, Pennsylvania.

The Petitioner is directed to give notice of the hearing by Publication in the Clearfield Progress and in the Clearfield County Legal Journal. Said notice to run one time in each publication.

BY THE COURT,


JUDGE

FILED 4cc
0134267 AUG 19 2008 Atty C. Kubista
AUG 19 2008 (60)
William A. Shaw
Prothonotary/Clerk of Courts

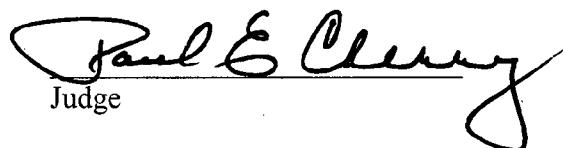
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

IN RE: :
RAEGAN NICHOLE COLEMAN : No. 2008-1514-CD
D.O.B. April 25, 2002 :
:

ORDER

NOW, this 15th day of September, 2008, upon consideration of Petitioner's Petition for Change of Name and agreement of the parties, the name of Raegan Nichole Coleman is hereby changed to Raegan Nichole Peters.

BY THE COURT,


Judge

FILED 3CC
013-14-2008 Atty C.Kubista
SEP 15 2008 (will serve)

William A. Shaw
Prothonotary/Clerk of Courts

(610)

ORIGINAL

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

IN RE:

RAEGAN NICHOLE COLEMAN
D.O.B. April 25, 2002

: No. 2008-1514-CD

: Type of case: Civil

: Type of pleading: **PROOF
OF PUBLICATION**

: Filed on behalf of: Petitioner,
Scott Peters

: Counsel for Petitioner:
Courtney L. Kubista, Esquire
Supreme Court No. 91244

: NEISWENDER & KUBISTA
: 211 ½ North Second Street
: Clearfield, Pennsylvania 16830
: (814) 765-6500

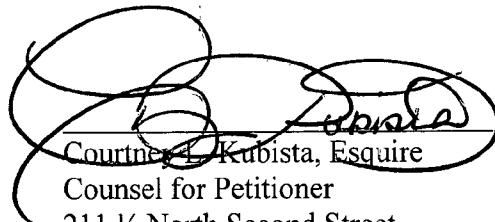
FILED
02:56p.m. GK
SEP 15 2008 2cc Atty. C.Kubista
William A. Shaw
Prothonotary/Clerk of Courts
GJU

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

IN RE: :
:
RAEGAN NICHOLE COLEMAN :
D.O.B. April 25, 2002 : No. 2008-1514-CD

PROOF OF PUBLICATION

I, Courtney L. Kubista, Esquire, hereby certify that the Petition for Change of Name was published in the Progress on August 27, 2008 and in the Clearfield County Legal Journal during the week of September 5, 2008. *See Attached Exhibits "A" and "B":*


Courtney L. Kubista, Esquire
Counsel for Petitioner
211 ½ North Second Street
Clearfield, PA 16830

for decree to change the name of his daughter, Raegan Nichole Coleman to Raegan Nichole Peters.

The Court has fixed the 15th day of September 2008 at 11:00 a.m. in Courtroom No. 2 of the Clearfield County Courthouse, Clearfield, Pennsylvania, as the time and place for the hearing of said Petition, when and where all persons interested may appear, and show cause, if any, why the request of the said petition should not be granted.

COURTNEY L. KUBISTA, Neiswender & Kubista, 211½ North Second Street, Clearfield, PA 16830.

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION-LAW
IN RE:
RAEGAN NICHOLE COLEMAN
DOB: 04/25/2002
No. 2008-1514-CD
Notice-CHANGE OF NAME
NOTICE IS HEREBY GIVEN that on August 14, 2008, the Petition of Scott Peters was filed in the above-named Court, praying for decree to change the name of his daughter, Raegan Nichole Coleman to Raegan Nichole Peters.

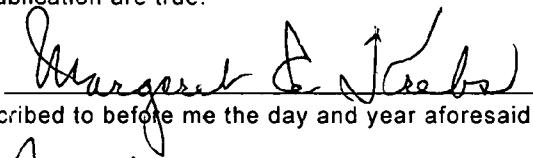
The Court has fixed the 15th day of September, 2008 at 11:00 a.m. in Courtroom No. 2 of the Clearfield County Courthouse, Clearfield, Pennsylvania, as the time and place for the hearing of said Petition, when and where all persons interested may appear and show cause, if any, why the request of the said petition should not be granted.

COURTNEY L. KUBISTA
Neiswender & Kubista
211 1/2 North Second Street
Clearfield, PA 16830

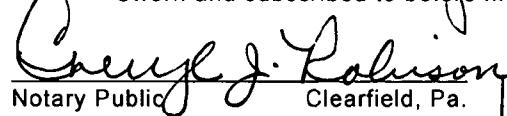
8:27-1d-b

On this 3rd day of September, A.D. 20 08, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of August 27, 2008. And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.



Sworn and subscribed to before me the day and year aforesaid.


Cheryl J. Robison
Notary Public
Clearfield, Pa.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cheryl J. Robison, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Oct. 31, 2011
Member, Pennsylvania Association of Notaries

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

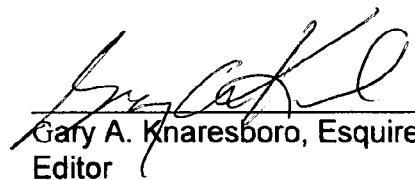
IN RE: RAEGAN NICHOLE COLEMAN
DOB: 04/25/2002
No. 2008-1514-CD
Notice - CHANGE OF NAME
NOTICE IS HEREBY GIVEN that on August 14, 2008 the Petition of Scott Peters was filed in the above-named Court, praying

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

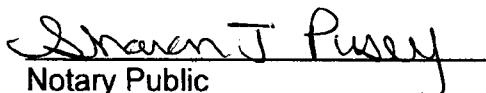
COUNTY OF CLEARFIELD : :

On this 5th day of September AD 2008, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of September 5, 2008, Vol. 20, No. 36. And that all of the allegations of this statement as to the time, place, and character of the publication are true.

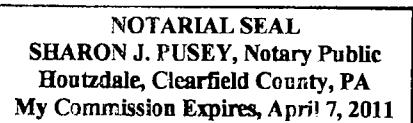


Gary A. Knaresboro, Esquire
Editor

Sworn and subscribed to before me the day and year aforesaid.



Notary Public
My Commission Expires



COURTNEY L. KUBISTA
211 1/2 N Second St
Clearfield, PA 16830