

IN THE COURT OF COMMON PLEAS OF BLAIR COUNTY, PENNSYLVANIA

\_\_\_\_\_) NO.  
Plaintiff )  
)  
vs. )  
) CUSTODY  
\_\_\_\_\_)  
Defendant )

**COMPLAINT FOR CUSTODY**

1. The Plaintiff is \_\_\_\_\_, residing at

\_\_\_\_\_  
(street) (city)  
\_\_\_\_\_  
(state) (zip code) (county)  
Phone:\_\_\_\_\_

2. The Defendant is \_\_\_\_\_, residing at

\_\_\_\_\_  
(street) (city)  
\_\_\_\_\_  
(state) (zip code) (county)  
Phone:\_\_\_\_\_

3. Plaintiff seeks:

**LEGAL CUSTODY:**

\_\_\_\_\_ shared legal custody (*important decisions are made by both parents working together*)  
\_\_\_\_\_ sole legal custody (*important decisions are made by one parent*)



The Father of the child is \_\_\_\_\_, currently residing at

\_\_\_\_\_  
(street) (city) (state) (zip code) (county)

4. The relationship of the Plaintiff to the child(ren) is that of \_\_\_\_\_. The Plaintiff currently resides with the following persons:

Name	Relationship
_____	_____
_____	_____

5. The relationship of the Defendant to the child(ren) is that of \_\_\_\_\_. The Defendant currently resides with the following persons:

Name	Relationship
_____	_____
_____	_____

6. Plaintiff (has)(has not) participated as a party or witness, or in another capacity, in other litigation concerning the custody of the said child in this or another court. The court, term number, and its relationship to this action is: \_\_\_\_\_.

Plaintiff (has) (has no) information of a custody proceeding concerning the child pending in a court of this Commonwealth or any other state. The court, term and number, and its relationship to this action is: \_\_\_\_\_.

Plaintiff (knows)(does not know) of a person not a party to the proceedings who has physical custody of the child or claims to have custodial rights with respect to the child. The name and address of such person is: \_\_\_\_\_ .

The best interest and permanent welfare of the child(ren) will be served by granting the relief requested because (set forth facts showing that the granting of the relief requested will be in the best interest and permanent welfare of the child)\_\_\_\_\_

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7. Each parent whose parental rights to the child (ren) have not been terminated and the person who has physical custody of the child (ren) have been named as parties to this action. All other persons, named below, who are known to have or claim a right to custody of the child (ren) will be given notice of the pendency of this action and the right to intervene:

Name	Address	Basis of Claim
_____	_____	_____
_____	_____	_____

8. a. If the plaintiff is a grandparent who is not in loco parentis to the child and is seeking physical and/or legal custody pursuant to 23 Pa.C.S. §5323, you must plead facts establishing standing pursuant to 23 Pa.C.S. §5324(3). \_\_\_\_\_

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b. If the plaintiff is a grandparent or great-grandparent to is seeking partial physical custody or supervised physical custody pursuant to 23 Pa.C.S. §5325. You must plead facts establishing standing pursuant to §5325. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

c. If the plaintiff is a person seeking physical and/or legal custody pursuant to 23 Pa.C.S. §5324(2) as a person who stands in loco parentis to the child, you must plead facts establishing standing: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. I have attached the Criminal Record/Abuse History Verification form required pursuant to Pa. R.C.P. No. 1915.3-2.

WHEREFORE, Plaintiff requests the Court to grant Plaintiff

**LEGAL CUSTODY**

\_\_\_\_\_ shared legal custody \_\_\_\_\_ sole legal custody

**PHYSICAL CUSTODY**

\_\_\_\_\_ partial physical custody \_\_\_\_\_ primary physical custody

\_\_\_\_\_ shared physical custody \_\_\_\_\_ sole physical custody

\_\_\_\_\_ supervised physical custody

\_\_\_\_\_  
Plaintiff

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Plaintiff