

**IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA  
CIVIL / FAMILY DIVISION**

) NO.        -FC-  
Plaintiff )  
vs            ) CUSTODY  
              )  
              )  
Defendant )

**COMPLAINT FOR CUSTODY**

1. The Plaintiff is \_\_\_\_\_  
residing at \_\_\_\_\_
2. The Defendant is \_\_\_\_\_  
residing at \_\_\_\_\_
3. The Defendant is \_\_\_\_\_  
residing at \_\_\_\_\_
4. Petitioner seeks

**LEGAL CUSTODY**

- shared legal custody (*important decision are made by both parents working together*)
- sole legal custody (*important decision are made by one parent*)

**PHYSICAL CUSTODY**

- partial physical custody (*where the child lives some of the time*)
- primary physical custody (*where the child lives most of the time*)
- shared physical custody (*when the child lives with each parent on an approximately equal basis.*)
- sole physical custody (*when the child lives only with one parent*)
- supervised physical custody (*when time together is supervised*)

of the following child(ren):

<b>Child's Initials</b>	<b>Present Residence</b>	<b>Age and Year of Birth</b>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

5. The child(ren)  (was/were)  (was not/were not) born out of wedlock.

6. The child(ren) is/are presently in the custody of \_\_\_\_\_

Who resides at \_\_\_\_\_

(street)

(city)

(state)

(zip code)

(county)

7. During the past five years, the child(ren) has/have resided with the following and at the following addresses: *(if any minor children, list initials only)*

**List all persons**

**List all addresses**

**Dates**

List all persons	List all addresses	Dates
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

8. The Mother of the child(ren) is \_\_\_\_\_

currently residing at \_\_\_\_\_

(street)

(city)

(state)

(zip code)

(county)

9. The Father of the child(ren) is \_\_\_\_\_

currently residing at \_\_\_\_\_

(street)

(city)

(state)

(zip code)

(county)

10. The relationship of the Plaintiff to the child(ren) is that of \_\_\_\_\_

The Plaintiff currently resides with the following persons:

**Name**

**Relationship**

*(if any minor children, list initials only)*

Name	Relationship
_____	_____
_____	_____



15. 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**

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16. 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 who 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.

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- 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:

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

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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.**

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Date

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Plaintiff