

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

\_\_\_\_\_ :  
 Plaintiff : IN CUSTODY  
 v. :  
 :  
 : \_\_\_\_\_ of \_\_\_\_\_  
 :  
 \_\_\_\_\_ :  
 Defendant :

**EMERGENCY PETITION FOR SPECIAL RELIEF IN CUSTODY**

AND NOW COMES \_\_\_\_\_  
 who files this Emergency Petition for Special Relief in Custody and  
 alleges the following:

1. Plaintiff(s) Name(s) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_  
 County \_\_\_\_\_  
 State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 Telephone Number (\_\_\_\_)\_\_\_\_\_

The relationship of Plaintiff(s) to minor child(ren) is \_\_\_\_\_

2. Defendant(s) Name(s) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_  
 County \_\_\_\_\_  
 State \_\_\_\_\_ Zip Code \_\_\_\_\_

Telephone Number (\_\_\_\_\_)\_\_\_\_\_

The relationship of Defendant(s) to minor child(ren) is

\_\_\_\_\_.

3. The subject child(ren) is/are:

Full Name of Child \_\_\_\_\_

Address \_\_\_\_\_

Full Name of Child \_\_\_\_\_

Address \_\_\_\_\_

Full Name of Child \_\_\_\_\_

Address \_\_\_\_\_

Full Name of Child \_\_\_\_\_

Address \_\_\_\_\_

Full Name of Child \_\_\_\_\_

Address \_\_\_\_\_

4. Has Children & Youth Services ever been involved with this/these child(ren)? \_\_\_\_\_ YES \_\_\_\_\_ NO

If you checked YES, you must explain when Children & Youth Services were involved and the outcome or result of their involvement. Has there been legal action taken to remove the child(ren) from the home of any party? Please explain.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Please explain in detail what bad things will happen to the child(ren) if a court order is not entered before the parties can attend a Custody Conference in due course. BE SPECIFIC – state dates, times, and places where bad things have happened to the child(ren) and/or what bad things you foresee happening to the children in the future if the Court does not intervene immediately.

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WHEREFORE, the Petitioner requests that the Court grant the following relief:

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Signature of Petitioner(S):

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Date: \_\_\_\_\_

**READ THE FULL STATEMENT BELOW BEFORE YOU SIGN IT.**

I 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. § 4904 relating to unsworn falsification to authorities and can be punishable by fine or imprisonment.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Petitioner

\_\_\_\_\_  
Signature of Petitioner

IN THE COURT OF COMMON PLEAS OF LUZERNE COUNTY, PENNSYLVANIA

	:	
Plaintiff	:	IN CUSTODY
	:	
v.	:	
	:	
	:	_____ of _____
	:	
Defendant	:	

**ORDER**

AND NOW THIS \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, upon consideration of the attached Emergency Petition for Special relief, it is hereby ordered as follows:

- \_\_\_\_\_ The Emergency Petition for Special Relief is hereby denied.
- \_\_\_\_\_ The subject child(ren) shall not be removed from Luzerne County pending further Order of Court.
- \_\_\_\_\_ A hearing on the Emergency Petition for Special Relief shall be convened at \_\_\_\_\_ o'clock \_\_\_\_\_.m., on \_\_\_\_\_, 20\_\_\_\_, before \_\_\_\_\_, J. at \_\_\_\_\_  
 \_\_\_\_\_ Luzerne County Courthouse,  
 Bernard C. Brominski Building,  
 Third Floor, 113 West North Street,  
 Wilkes-Barre, PA 18711
- \_\_\_\_\_ Luzerne County Courthouse  
 Main Building  
 200 North River Street  
 Wilkes-Barre, PA 18711
- \_\_\_\_\_ Luzerne County Courthouse  
 Penn Place  
 20 North Pennsylvania Boulevard  
 Wilkes-Barre, PA 18701

\_\_\_\_\_ The Emergency Petition for Special Relief is  
GRANTED as follows:

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BY THE COURT:

\_\_\_\_\_ Date

\_\_\_\_\_ J.