

IN THE COURT OF COMMON PLEAS OF LUZERNE COUNTY, PENNSYLVANIA

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

**PETITION FOR SPECIAL RELIEF IN CUSTODY**

AND NOW COMES \_\_\_\_\_  
who files this 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.

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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

	:	CIVIL ACTION - LAW
Plaintiff	:	
v.	:	
	:	
	:	
	:	_____ of _____
Defendant	:	

**RULE**

AND NOW THIS \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, upon consideration of the within Petition for Special Relief, a Rule is granted upon \_\_\_\_\_, to show cause why the relief requested should not be granted.

RULE RETURNABLE for hearing on the \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_, at \_\_\_\_: \_\_\_\_ .m.,

\_\_\_\_\_ Luzerne County Courthouse, Bernard Brominski Building,  
 Third Floor, 113 West North Street, Wilkes-Barre, PA

\_\_\_\_\_ Luzerne County Courthouse, Main Building, 200 North River  
 Street, Wilkes-Barre, PA

\_\_\_\_\_ Luzerne County Courthouse, Penn Place, 20 North  
 Pennsylvania Avenue, Wilkes-Barre, PA

before \_\_\_\_\_, J.

BY THE COURT:

\_\_\_\_\_

J.