

PLAINTIFF: _____ :
 _____ :
 VS. _____ : CIV NO. _____
 _____ :
 DEFENDANT: _____ :

Work Schedule: _____

2. Names, ages, birth dates, grade and school district, if applicable, of all children involved:

<u>Name</u>	<u>DOB/Age</u>	<u>School/Grade</u>

3. List all of the places the child(ren) have resided and with whom the child(ren) has/have resided with, including dates:

<u>Address</u>	<u>Residents</u>	<u>Dates of Residency</u>

PRE-TRIAL STATEMENT:

1. Describe how you will encourage and permit frequent communication between the child(ren) and the other party:

2. Describe any present or past abuse, if any, committed by a party or member of a party's house hold and whether there is a continued risk of harm to the child(ren):

3. Describe the daily parental duties you perform on behalf of the child(ren):

4. Describe how you provide the child(ren) with stability and continuity in the child(ren)'s education, family, and community life:

5. Describe the availability of extended family to assist or support you:

6. Have there been any attempts by the other party to turn the child(ren) against you: If yes, please explain:

7. Describe your relationship with the child(ren) and the child(ren)'s relationship with the other party:

8. Describe how you attend to the daily, physical, emotional, developmental, educational and special needs of the child(ren):

9. Describe how close your residence is to that of the other party:

10. Describe your availability in caring for the child(ren) of your ability to make appropriate child-care arrangements. Include your work schedule and current arrangements:

11. Describe the level of conflict between you and the other party, if any, and how you plan on co-parenting with one another despite such conflict:

12. Describe any history of drug or alcohol abuse of a party or member of the party's household:

13. List any other relevant factor that you believe should be considered in determining custody:

14. State any previous efforts you have made in trying to resolve this matter:

15. Attach a proposed custody order or state the specific modifications sought to the current custody order:

TRIAL INFORMATION:

1. List witnesses you intend to call at a custody hearing

a. Names: _____
Address: _____
Phone Number: _____
Purpose of testimony: _____

b. Names: _____
Address: _____
Phone Number: _____
Purpose of testimony: _____

c. Names: _____
Address: _____
Phone Number: _____
Purpose of testimony: _____

d. Names: _____
Address: _____
Phone Number: _____
Purpose of testimony: _____

e. Names: _____
Address: _____
Phone Number: _____
Purpose of testimony: _____

f. Names: _____
Address: _____
Phone Number: _____
Purpose of testimony: _____

2. List exhibits you intend to present at Trial:

3. List specific issues for resolution (including but not limited to relocation, suitability of parent, unusual opportunities, availability of one parent as opposed to another, ect.)

Submitted by:

Signature

Copies sent/provided to: Court
Opposing Party

VERIFICATION

I verify that the statements made in this Pre-Trial Statement 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).

Signature

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy within Pre-Trial Statement was delivered to the opposing party by personal hand delivery or by U.S. First Class Mail, postage pre-paid:

Signature