

09-19084

THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA
FAMILY COURT COVER SHEET

NO. 09-19084

KATIE I. GOSSELIN,
Plaintiff

Cheryl L. Young, Esquire ID: 43610
Attorney for Plaintiff OR Pro se Party

VS.

JONATHAN K. GOSSELIN,
Defendant

10.313.1670
Phone Number(s)

Charles J. Meyer, Esquire ID: 58484
Attorney for Defendant OR Pro se Party

215.977.1041
Phone Number(s)

AVERMENT OF CONSOLIDATION

On the spaces below, please provide the docket number of all other companion cases associated with this case (including any closed files involving the same party-litigants) that related to:

- | | |
|------------------------------------------------------------|-------------------|
| 1. Divorce/Annulment | 2. Support |
| 3. Equitable Distribution | PACSES No.: |
| 5. Custody/Visitation | 4. Paternity |
| 7. Outstanding Temporary/Final Protection From Abuse Order | 6. Special Relief |

I certify that the information provided above is comprehensive and complete to the best of my knowledge, and that I have formally entered my appearance for the case captioned above.

BY: Cheryl L. Young
Cheryl L. Young, Esquire

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IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

KATIE L. GOSSELIN, <i>Plaintiff</i>	:	CASE NO.
VS.	:	ATTORNEY I.D. NO. 43610
JONATHAN K. GOSSELIN, <i>Defendant</i>	:	IN DIVORCE

NOTICE TO DEFEND AND CLAIM RIGHTS

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take prompt action. You are warned that if you fail to do so, the case may proceed without you and a decree of divorce or annulment may be entered against you by the Court. A judgment may also be entered against you for any other claim or relief requested in these papers by the Plaintiff. You may lose money or property or other rights important to you, including custody or visitation of your children.

When the ground for divorce is indignities or irretrievable breakdown of the marriage, you may request marriage counseling. A list of marriage counselors is available in the office of the Prothonotary at:

MONTGOMERY COUNTY COURTHOUSE
SWEDE AND AIRY STREETS
NORRISTOWN, PENNSYLVANIA 19404

IF YOU DO NOT FILE A CLAIM FOR ALIMONY, MARITAL PROPERTY, COUNSEL FEES OR EXPENSES BEFORE THE FINAL DECREE OF DIVORCE OR ANNULMENT IS ENTERED, YOU MAY LOSE THE RIGHT TO CLAIM ANY OF THEM.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT PERSONS AT A REDUCED FEE OR NONE.

LAWYER REFERENCE SERVICE
MONTGOMERY BAR ASSOCIATION
409 CHERRY STREET
NORRISTOWN, PENNSYLVANIA 19401
Telephone: (610) 279-9661, EXTENSION 201

17:03 513-527-5153 JUDGE OFFICE 8587

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

KATIE I. GOSSELIN
 PMB 356
 Sinking Spring, PA. 19608
Plaintiff

VS.

JONATHAN K. GOSSELIN
 PMB 356
 Sinking Spring, PA. 19608
Defendant

2009-19084-0000
 6/22/2009 3:47:52 PM
 Complaint Divorce
 Receipt# 2009-8-02159
 Mark Levy - Montgomery County Prothonotary

ATTORNEY I.D. NO. 43610

IN DIVORCE

COMPLAINT IN DIVORCE

1. Plaintiff is KATIE I. GOSSELIN whose address is [REDACTED] PMB 356, Sinking Spring, Berks County, PA. 19608.
2. Defendant is JONATHAN K. GOSSELIN whose address is [REDACTED] Road, PMB 356, Sinking Spring, Berks County, PA. 19608.
3. The parties have been bonafide residents of the Commonwealth of Pennsylvania for a period of more than six (6) months immediately preceding the filing of this Complaint.
4. The parties were married on June 17, 1999 in Wyomissing, PA.
5. Neither Plaintiff nor Defendant is in the military or naval service of the United States or its allies within the provisions of the Service Members Civil Relief Act of 2003.
6. There has been no prior action for divorce or annulment instituted by either of the parties in this or any other jurisdiction.

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 Ymm

7:03 513-527-5153

7. The parties have agreed to submit to the jurisdiction and venue of this matter in the Court of Common Pleas of Montgomery County, PA.

8. Plaintiff has been advised of the availability of counseling and of the right to request that the Court require the parties to participate in counseling.

COUNT I - GROUNDS FOR DIVORCE

Request for a No-Fault Divorce Under 3301(c) of the Divorce Code

9. The prior paragraphs of this Complaint are incorporated herein by reference as though set forth in full.

10. The marriage of the parties is irretrievably broken.

WHEREFORE, if both parties file affidavits consenting to a divorce after ninety (90) days have elapsed from the commencement of this action, Plaintiff respectfully requests the Court to enter a decree of divorce pursuant to Section 3301(c) of the Divorce Code.

Request for a no-fault divorce under Section 3301(d) of the Divorce Code

11. The prior paragraphs of this Complaint are incorporated herein by reference as though set forth in full.

12. The marriage of the parties is irretrievably broken.

13. At the time of the hearing, Plaintiff will submit an affidavit alleging that the parties have lived separate and apart for at least two (2) years.

WHEREFORE, Plaintiff respectfully requests the Court to enter a decree of divorce pursuant to Section 3301(d) of the Divorce Code.

COUNT II - EQUITABLE DISTRIBUTION

Request for equitable distribution of marital
property under Section 3502 of the Divorce Code

14. The prior paragraphs of this Complaint are incorporated herein by reference as though set forth in full.

15. Plaintiff and Defendant have acquired marital property as defined by the Divorce Code, which is subject to equitable distribution pursuant to Section 3502 of the Divorce Code.

16. Plaintiff and Defendant have been unable to agree as to the equitable distribution of said property, as of the date of the filing of this Complaint.

17. Plaintiff requests that the Court equitably divide, distribute or assign the marital property between the parties.

WHEREFORE, Plaintiff respectfully requests the Court to enter an order of equitable distribution of marital property pursuant to Section 3502 of the Divorce Code.

Request for approval of any settlement agreement
and incorporation thereof in divorce decree under
Sections 3104(a)(1) and (3) and 3323(b) of the Divorce Code

18. The prior paragraphs of this Complaint are incorporated herein by reference as though set forth in full.

19. While no settlement has been reached as of the date of the filing of this Complaint, Plaintiff is and has always been willing to negotiate a fair and reasonable settlement of all matters with Defendant.

20. Although no written settlement agreement has been entered into between the parties as of the date of the filing of this Complaint, in the event that a written settlement agreement is entered prior to the final disposition of this action, Plaintiff desires that such written

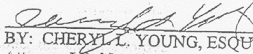
06/23/2009 17:06 818-527-5153 FEDEX OFFICE 0587 PAGE 07

settlement agreement be approved by the Court and incorporated in any divorce decree which may be entered dissolving the marriage between the parties.

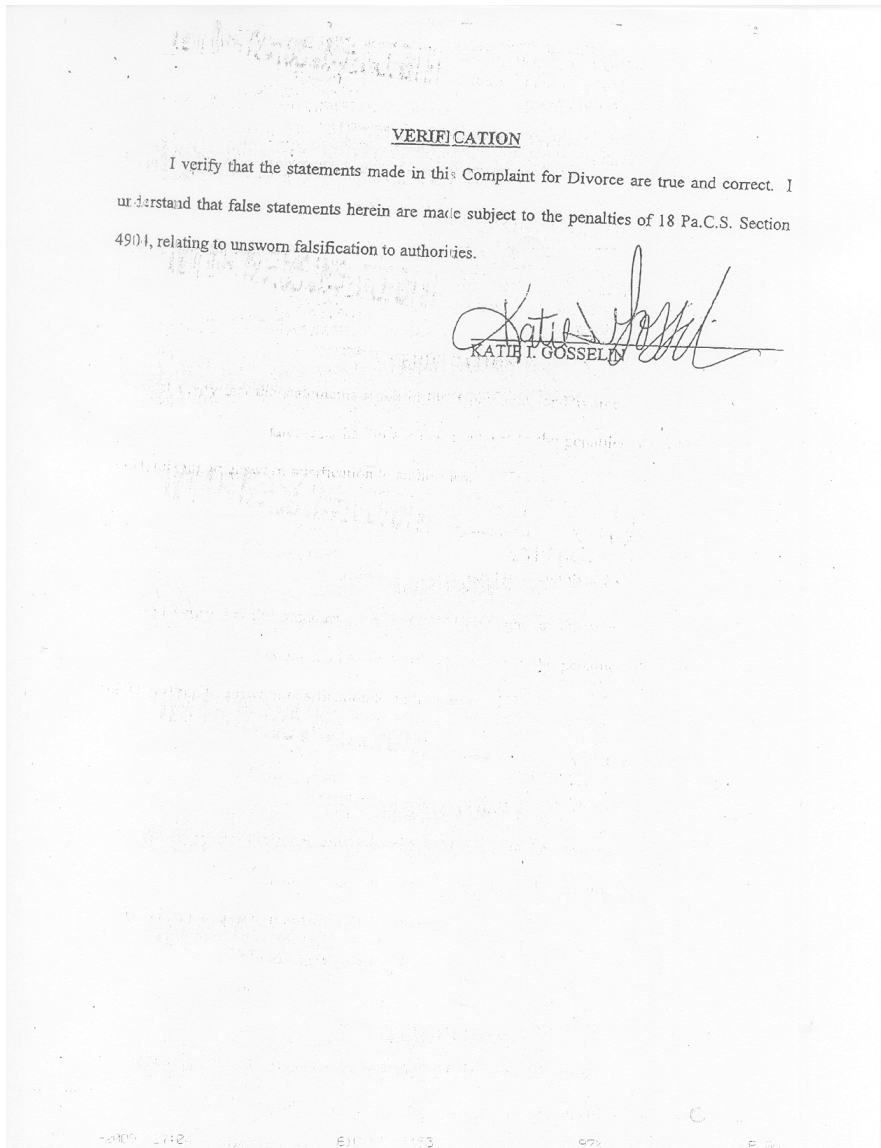
WHEREFORE, if a written settlement agreement is reached between the parties prior to the final disposition of this action, Plaintiff respectfully requests that, pursuant to Section 3104(a)(1) and (3) and 3323(b) of the Divorce Code, the Court approve and incorporate such agreement in the final divorce decree and grant such additional relief or remedy as equity and/or justice require.

Respectfully submitted,

HANGLEY ARONCHICK SEGAL & PUDLIN


BY: CHERYL L. YOUNG, ESQUIRE
Attorney I.D. No. 43610
2 West Lafayette Street
Norristown, PA 19401
(610) 313.1670

Date: June 23, 2009



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IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

KATHLEEN GOSSELIN,

Plaintiff

CASE NO.

VS.

ATTORNEY I.D. NO. 43610

JONATHAN K. GOSSELIN,

Defendant

IN DIVORCE

NOTICE OF COUNSELING PURSUANT TO RULE 1920.12(A)

THE DIVORCE CODE OF PENNSYLVANIA REQUIRES THAT YOU BE NOTIFIED OF THE AVAILABILITY OF COUNSELING WHERE A DIVORCE IS SOUGHT UNDER ANY OF THE FOLLOWING GROUNDS:

- | | | |
|--------------------|---|--------------------------------------------|
| Section 3301(a)(6) | - | Indignities |
| Section 3301(c) | - | Irretrievable breakdown |
| | - | Mutual Consent |
| Section 3301(d) | - | Irretrievable breakdown |
| | - | Two-year separation - |
| | - | Where the Court determines that there is a |
| | | reasonable prospect of reconciliation. |

A list of certain professionals is available for inspection in the Branch Office of the Prothonotary in the Montgomery County Court House, Swede and Airy Streets, Norristown, Pennsylvania, 19401.

HANGLEY ARONCHICK SEGAL & PUDLIN

BY: Cheryl L. Young ESQUIRE

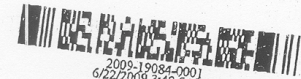
Attorney I.D. No. 43610

2 West Lafayette Street

Norristown, PA 19401

(610) 313.1670

Date: June-23-2009



2009-19984-0001
6/22/2009 8:49:54 PM
Notice of Counseling
Receipt# 2009-8-02159
Mark Levy - Montgomery County Prothonotary