

_____ /	:	IN THE COURT OF COMMON PLEAS
	:	
Plaintiff,	:	LAWRENCE COUNTY, PENNSYLVANIA
	:	
vs.	:	DOCKET NO. _____ OF 20__, C.A.
	:	
_____ /	:	
	:	
Defendant.	:	

PRETRIAL STATEMENT

THE PRETRIAL STATEMENT SHALL BE FILED AT THE PROTHONOTARY'S OFFICE AT LEAST TEN (10) DAYS PRIOR TO THE SCHEDULED PRETRIAL CONFERENCE. THE PARTY WILL BE EXCLUDED FROM PRESENTING ANY EVIDENCE OR CALLING ANY WITNESSES NOT LISTED IN THE PRETRIAL STATEMENT AT THE TIME OF THE CUSTODY TRIAL.

NAME: _____

ADDRESS: _____

WITNESSES/EXHIBITS

1. List the name and address of each expert witness which you intend to call at the time of the Custody Trial:

2. List the names and addresses, and relationship between the witness and yourself which you intend to call at the time of the Custody Trial:

3. List and describe all exhibits you intend to introduce at the time of the Custody Trial:

POSITION OF PARTY SUBMITTED PRETRIAL STATEMENT

1. Describe how you will ensure the safety of the minor child(ren):

2. Describe any past or present abuse, if any, committed by a party or a member of a party's household, which may include past or current protection from abuse or sexual violence protection orders where there has been a finding of abuse:

- 2.2. Describe any violent or assaultive behavior committed by yourself or the other party:

2.3. Describe how you will encourage and permit frequent and continuing contact between the minor child(ren) and the other party and if such contact is consistent with the safety needs of the minor child(ren):

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

4. Describe how you provide the minor child(ren) with stability and continuity in the minor child(ren)'s educational, family life, and community life, and whether any changes are necessary to protect the safety of the minor child(ren) or a party:

5. Describe the availability of extended family to assist or support you when you are caring for the minor child(ren):

6. Describe the relationship among the minor child(ren) and their sibling(s) or stepsibling(s):

7. Describe your understanding of the preference of the minor child(ren), based on the minor child(ren)'s developmental stage, maturity, and judgment:

8. Have there been any attempts made by you or another party to turn the minor child(ren) against the other? If so, have there been instances of abuse where reasonable safety measures were necessary to protect the safety of the minor child(ren)?

9. Describe how you maintain a loving, stable, consistent and nurturing relationship with the minor child(ren) adequate for the minor child(ren)'s needs:

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

11. How far away is your residence from the residences of the other parties?

12. Describe your availability to care for the minor child(ren) and describe your ability to make appropriate child-care arrangements:

13. Describe the level of conflict between you and the other parties and describe your willingness and ability to cooperate with the other parties. Has there been an unwillingness or inability to cooperate with another party to protect the minor child(ren) or yourself from abuse?

14. Describe any history of drug or alcohol abuse by you or a member of your household and describe any history of drug or alcohol abuse by the other parties or members of their household:

15. Describe your mental and physical condition and the mental and physical condition of the members of your household and describe your understanding of the mental and physical condition of the other parties and members of their household:

16. Describe any other information which you think this Court should consider:

PROPOSED CUSTODIAL ARRANGEMENT

1. Describe your proposed custodial arrangement:

[illegible]

VERIFICATION

By signing this Pretrial Statement, I verify that the Pretrial Statement has been filed at the Prothonotary's Office and served upon the opposing parties in accordance with the Pennsylvania Rules of Civil Procedure (Pa.R.Civ.P. 1915.4-4).

Signature of Party