

IN THE COURT OF COMMON PLEAS OF YORK COUNTY, PENNSYLVANIA

Plaintiff : No. _____-FC-_____-03
: :
: **CIVIL ACTION – LAW**
VS. : :
: :
: **CUSTODY**

Defendant

MEMORANDUM FOR CUSTODY PRE-TRIAL CONFERENCE

SUBMITTED BY: _____

COUNSEL FOR: _____

I. BRIEF SUMMARY OF CASE, INCLUDING NAMES AND DATES OF BIRTH OF CHILDREN AT ISSUE AND THE CURRENT CUSTODY SITUATION:

Plaintiff, _____ is the
(Name of Plaintiff)

(Plaintiff's relationship to the child/ren)

Defendant, _____ is the
(Name of Defendant)

(Defendant's relationship to the child/ren)

of the following child(ren)'s at issue:

Name:	Date of birth:
_____	_____
_____	_____
_____	_____
_____	_____

The present custody situation is as follows:

The present custody situation has existed since approximately _____
months / years.

II. STATEMENT OF ISSUES EXPECTED TO ARISE DURING TRIAL:

III. ADMISSION FROM PLEADINGS TO BE MADE PART OF RECORD:

IV. STIPULATION OF PARTIES:

V. WITNESSES TO BE CALLED:

NAME	ADDRESS	RELATIONSHIP TO PARTY & SUBJECT OF TESTIMONY
1.		
2.		
3.		
4.		
5.		
6.		

Pursuant to Pa.R.C.P. §1915.4-4(b)(2) the Memorandum for Custody Pre-Trial Conference must include a statement by the party or the party's counsel that he or she has communicated with each listed witness.

VI. STATUS OF EXPERT WITNESSES, REPORTS, EVALUATIONS AND STUDIES:

VII. STATEMENT OF OBJECTIONS OR UNUSUAL EVIDENTIARY PROBLEMS EXPECTED TO ARISE AT TRIAL: (Parties should submit authority for their respective positions with this memorandum.)

VIII. SPECIAL REQUESTS, UNCOMPLETED MATTERS:

IX. STATEMENT OF SETTLEMENT PROSPECTS:

X. ESTIMATED TIME NEEDED FOR TRIAL:

Respectfully submitted,

Signature

Print Name

Address - Street

City, State and Zip Code

Phone Number