

IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY
P E N N S Y L V A N I A
CIVIL DIVISION – LAW

Plaintiff: _____ :
 v. _____ : No. _____
 Defendant: _____ :

PRE-TRIAL STATEMENT

(To be submitted at least five (5) days prior to a Pre-Trial Conference)
 You *must* attach a copy of the most recent Custody Order

General Information:

1. Names, addresses, ages, employment, and work schedules of the parties:

Plaintiff / _____ :

Name: _____
 Address: _____
 Age: _____
 Employer: _____
 Work Schedule: _____

Defendant / _____ :

Name: _____
 Address: _____
 Age: _____
 Employer: _____
 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 of all places the child(ren) have resided and with whom the child(ren) has/have resided, with along with dates:

<u>Address</u>	<u>Residents</u>	<u>Dates of Residency</u> (i.e. February 2018-March 2020)

Position of Party Submitting 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 household 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) or your ability to make appropriate child-care arrangements. Please also describe your work schedule:

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

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

13. Describe any concerns you have about the mental or physical condition of a party or member of a party's household:

14. List any other relevant factors that should be considered:

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

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

17. Mediation Option:

By checking and signing next to the below box, you verify that you, as a party or as counsel for a party, consent to participating in a mediation, whereas the Judge will act as mediator during the course of the resolution of the instant matter. A “Mediation” is the confidential process by which a neutral mediator (here, the Judge) assists the parties in attempting to reach a mutually acceptable agreement on issues arising in a custody action. Pa.R.C.P. 1940.2. An agreement reach by the parties must be based on the voluntary decisions of the parties and not the decision of the mediator. *Id.* Additionally, the parties consent to “caucusing,” a mediation procedure which may be used at the mediator’s discretion. Caucusing entails the parties being physically separated so the mediator can speak with the parties individually. The purpose of caucusing is to obtain a resolution in the matter, not to further ones position. If the parties *cannot* reach an agreement, the mediation will cease and a trial will commence at a later time. In this event, the Judge will remain impartial and will not take into account any facts heard during the mediation efforts. Further, the parties waive any potential conflict of the Judge. Mediation can be a beneficial process as it allows for agreements to be reached by the parties while avoiding litigation.

By signing and checking the box below, the party has made an informed decision to partake in mediation:

Signature

Trial Information:

1. List of witnesses you would intend to call:

a. Name: _____
Address: _____
Phone Number: _____

b. Name: _____
Address: _____
Phone Number: _____

c. Name: _____
Address: _____
Phone Number: _____

d. Name: _____
Address: _____
Phone Number: _____

e. Name: _____
Address: _____
Phone Number: _____

f. Name: _____
Address: _____
Phone Number: _____

2. List exhibits you intend to present at Trial:

3. List specific issues for resolution (i.e. relocation, suitability of parent, unusual opportunities for enrichment, availability of one parent as opposed to another):

Submitted by:

Signature and Printed Name

Copies to be sent to: Court
Opposing Party/Counsel

CERTIFICATE OF SERVICE

This hereby certifies that a true and correct copy of _____ *Pre-Trial Information*
in the aforementioned case has been served via E-Mail and U.S. First Class Mail, Postage Pre-Paid
this _____ to:

Signature

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: _____

Signature: _____

Name: _____

Attorney No. (if applicable): _____