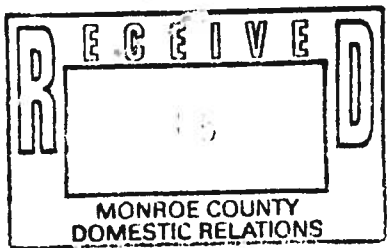


2



November 11, 1990

TO: Mr. Jerry Razzano

FROM: Catherine Nye Siglin

RE: Siglin, Catherine Nye
vs. Shupp, Robert
No. 2605 Civil 1980

Correspondence from your office dated 11-8-90, Visitation

Dear Mr. Razzano,

Thank you for forwarding a copy of the correspondence recieved and dated 10-30-90 (Shupp,R.). Without going into great detail concerning the matter of visitation, Iam briefly commenting and forwarding legal correspondence so that you are able to understand that the situation is not as is outlined in Robert Shupp's letter. I want to go on record as saying that to believe that the letter was even written by Mr. Shupp is ridiculous, almost laughable! It is nothing more than a pathetic, under-handed, last-ditch effort on the part of he and his advisors to get out of paying any child support.

In short, no one, including myself, has ever denied Mr. Shupp visitation. He became angry and aggitated in November 1989 when the children requested that they no longer be forced to spend prolonged periods of time with his third wife and her family. He then cut all ties with the children rather than respect their feelings and work out a compromise in the matter. My attorney and I tried repeatedly to rectify the situation as is evidenced by attachments 1,2,&3. We recieved no response at all.

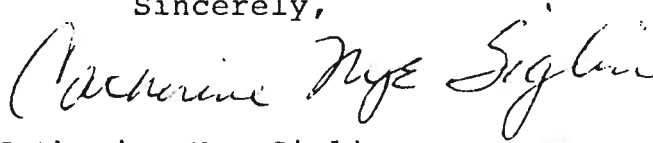
At the meeting of 2-90, my children made it very clear that they were hurt and angry to say the least by Mr. Shupp's actions/inaction toward them and his unwillingness to visit with them without his third wife. This situation has caused my children and my family extreme emotional as well as financial upset. Again,Mr. Shupp made no attempt to work things out.

The information regarding attempted contact again, simply an effort to make him look like a concerned parent---- He is not! What he failed to mention in his letter is that he has requested , in writing, a relinquishment of his parental rights. (see attachment 4) While this "good" father is telling you of his concern, he is at the same time attempting to legally wash his hands of any and all responsibility concerning my children.

In summation, this is not a situation of parental concern on Mr. Shupp's part but of, quite simply, MONEY. He has never paid any medical bills involving my children for the last ten years. This has been the sole responsibility of myself and my husband James. In 1985 I voluntarily reduced his support because he was having problems in his second marriage. He has obviously overextended himself financially again in his third marriage and is attempting to weasel out of any obligation to my children.

Although I realize your office does not deal with the above issues, feel free to contact me or my attorney if you have any questions. Also, be advised that litigation involving the matter herein is pending.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Nye Siglin". The signature is written in dark ink and is positioned above the typed name.

Catherine Nye Siglin

cc: Janet J. Siracuse

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County Case# 3954

Defendant's Name: Robert A. Shupp Sr.

Place of residence: Jonas, Pa.

Date of Birth: February 17, 1953

Occupation: Non-union Heavy Equipment Operator

Education: High School Graduate

Spouse's Name: Kathleen

Spouse's birthrate: April 01, 1957

Spouse's occupation: Bookkeeper for paving company

Education: Technical School Graduate

Names of Natural children: Robert A. (Shupp II) Siglin, age 17
Courtney E. (Shupp) Siglin, age 13

Names of Stepchildren: Kevin Zicker, age 13
Stephen Zicker, age 8

Plaintiff's name-Catherine Nye Siglin

Occupation:-Teacher, Special Education certified

Education: College Graduate 1989

Plaintiff's spouse's name-James Siglin

Occupation: Head of personnel, Connaught Labs

Education:: College Graduate

Place of residence: Mountainhome, Pa.

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County Case# 3954

1. Lack of regard for previous court orders.
 - a. denied my right to speak to my children in a non-hostile and non-threatening manner.
 - b. plaintiff admitted in her own kitchen that she was claiming both children as tax deductions each year since 1981 despite the property settlement order which clearly allots both deductions to the defendant.
2. Support Appeal
 - a. Domestic Relations refused to acknowledge correlation between support and visitation
 1. allowed plaintiff to continue to collect support while denying defendant visitation as per court order.
 2. allowed plaintiff to seek and receive higher amount for support while denying visitation, even though they were aware that defendant was being denied parental rights.
 3. Judge denied father's right to participate in decisions regarding the children's welfare.
 4. Domestic Relations stated that visitation was not pay-per visit and ordered defendant to continue to make support payments.
 5. Judge cited case as reason for upholding order. We have no knowledge of what this case means or what bearing it actually had on defendant's appeal.
 6. Domestic Relations made a token attempt to advise the plaintiff that they were aware of non-visitiation situation but never followed it through other than sending a letter one time.
3. Violation of court order
 - a. plaintiff refused to let children speak for themselves.
 - b. plaintiff tried to stop the defendant from receiving children's report cards and school information.
 1. school principal said he knew of no one listed on children's records as father by name of Robert A. Shupp Sr.
 2. Had to enlist Mark of Rep. Joseph Battisto's office to intervene in order to continuing receiving report cards.
 3. Plaintiff threatened to remove children by force in necessary from any school activity if I attended.
 - c. plaintiff threatened defendant over telephone twice that he would never see children again.
 - d. plaintiff threatened to "have defendant's house" when this was over.
 - e. plaintiff threatened to hire lawyer for children at defendant's expense.
 - f. Visitation
 1. Scheduling
 - a. plaintiff canceled scheduled visitations without agreement or knowledge of defendant.
 - b. plaintiff scheduled all her activities and gave defendant "left-over" time.

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County

1. Def. was given lists of their activities and not compensated with alternate dates.
2. Plaintiff said she required notice of all def. plans and activities in advance so that she could determine whether or not they should go. (even on def. regular weekends)
 - a. New York Trip in October 1989. Plaintiff said Courtney's shopping trip to mall must be that time.
 - b. Circus March 1989. We bought advance tickets and children did not attend due to step-father's distant cousins's wedding.
 - c. Fourth of July holiday 1988. Expecting children as per schedule. Courtney stayed over holiday and regular weekend visitation at plaintiff's sister's house without notifying defendant until time of pick-up.
2. Telephone calls and communications
 - a. Phone was busy for hours at a time.
 1. children informed def. that plaintiff took phone off the hook frequently in order to study her school work.
 - b. Answering machine was put on in December 1989.
 1. Plaintiff claimed to need machine for employment responses
 2. Machine remained on constantly even after she obtained employment.
 3. Def. believes machine was to screen calls from him.
 4. Despite def. and other family members leaving messages none were ever returned.
 5. When children were permitted to talk to def. often times calls were being interrupted by plaintiff or step-father picking up on extension and hanging up repeatedly.
3. Transportation
 - a. Def. was providing 98% of transportation to and from visitation with def.
 - b. Plaintiff proposed that def. not expect the have children for entire weekends and to provide transportation not matter how short a period they desired to visit.
 - c. Def. still lives in same area. Plaintiff moved away to another area approximate driving time 1 hour in non-traffic time each way.
4. Holidays
 - a. Plaintiff said that holiday times were time to be with her family and refused that same consideration for def. family.
 - b. Plaintiff refused to share Christmas.
 1. 1987-children could not be picked up until 6:30 pm. (after plaintiff's family celebration)
 2. 1988-family dinner delayed. Children were unavailable to be picked up before 7:30 pm.
 3. 1989-def. was denied visitation or contact with children.

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County

- c. Father's Day 1988
 - 1. Robbie was scheduled for hunting safety camp without knowledge or approval of def. who had planned trip to Boston.
- d. Birthdays
 - 1. def. was not permitted to have children of visit with them because plaintiff felt they should be "home" on those days.
- 5. Discussions with Plaintiff
 - a. plaintiff felt children should not have chores to do when visiting def.
 - b. plaintiff objects to def.'s wife and stepchildren being present in defendant's home during visitation.
 - 1. alternate weekend visitation was offered so that the children could have their father's undivided attention. This offer was rejected by Courtney and Robbie who said that they wanted to visit Kevin and Stephen as well.
 - c. Plaintiff called defendant's wife at work to complain about defendant's late support payment.
 - d. Plaintiff complained that def. was being unfair in insisting that children adhere to a rigid ever other weekend visitation schedule of four days each month. She considered a weekend a prolonged visit.
 - 1. Plaintiff contended that children were in a developmental stage and a rigid schedule was not in their best interest.
 - e. Plaintiff insisted that def. or def. wife come to the door to call for the children even though driveway is right beside house and vehicle can be clearly seen.
 - f. Courtney told def. mother that she was not eating school lunches because she dislike the food but was not permitted to pack her own lunch because stepfather would not allow it.
 - g. Children told def. and other family that they were denied food items they desired because stepfather did shopping and would not buy items that he did not have coupon for.
 - h. Children stated that plaintiff and stepfather were annoyed because def. allowed children to act silly and joke around.

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County

Important points that should be made:

1. Present court system allowed plaintiff to use support and visitation as a weapon against defendant.
2. Plaintiff was originally receiving \$160.00 per wk. She lowered it to 100.00 and subsequently lowered it again to \$60.00 during the period she was not working. Shortly after receiving her degree and obtaining a teaching position she requested that it be raised back up to \$125.00. This was after she threatened defendant.
3. Because court considers these separate issues, they were unwilling to act on def. behalf to resolve the problem.
4. Def. paid considerable amount in legal fees in 1981 when this happened the first time. Def. was denied visitation for five months during that time period. Defendant brought the matter to court for resolution before Judge Vican. But a strong enough message wasn't sent.
5. Defendant had valid court order for visitation. Def. does not feel that it is fair to make him pay again and again just to enforce the current court order when the Plaintiff chose to ignore it repeatedly.
6. Defendant is sickened that the Plaintiff was allowed to brainwash children in such as obvious manner with out any court intervention.
7. Defendant contends that the current laws and court system obstruct the rights of the non-custodial parent.
8. Defendant feels the laws should not force him to support the children in the manner that the stepfather has accustomed them to. To consider that in all cases braces and contact lenses are a necessity is a ludicrous assumption. To say that the non-custodial parent must pay 1/2 of the college tuition that the custodial parent chooses for the children is ridiculous. The financial condition of both parents should be considered when making a determination. Plaintiff should have been aware that the standard of living she is now accustomed to is made possible by her current husband not the defendant.
9. Court system should place more value on the rights of the non-custodial parent and protect their place in the lives of the children.
10. Family roots become factor when one parent wants to relocate and move the children. If the court considers this in custody, how can they say the it is in the best interest of the children to be relinquish-

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County

Important points that should be made: (continued)

ed. To be stripped of their roots just because the other parent suddenly decides that he/she doesn't consider the other parent to be a proper role model for the children is wrong. To communicate to the children that you think their father doesn't have a "real job" is degrading and malicious. For one parent to belittle the other parent's family and heritage is unfair to the children. They should be brought up to be proud of their heritage on both sides. In this case they were not. They were taught to be ashamed of an honest and proud family which descended from Pa Dutch farmers. The entire Shupp family was cut off from communicating with their own flesh and blood. Not one person in the Shupp family has ever seen nor heard from the children since 1989.

11. Defendant objects to the fact that no specific reason was ever given as to why the children suddenly allegedly began hating him as plaintiff claims they did. President Judge James Marsh who presided over the relinquishment hearing never once asked the reason for the relinquishment even though he had full access to the records pertaining to the case at his disposal. Domestic relations assured us that my letter would be placed in the file and it would be on record. The Judge never asked nor made any comment at all.
12. Defendant objects to the fact that despite his request to be assured that the children be told in person by him or by a letter written by him that this is what he was told that they wanted and not his wishes as the opposing attorney kept saying, he was told he had no right to subject the minor children to that. At the age that these children were at the time, I feel that they were old enough to sit and face me and tell me what it was that I said or did that was so terrible to deserve losing them. The way they looked at me with such hatred in their eyes in court I will never forget till the day I die. I always tried to give them what they wanted if it was within my means and because I was told it was freedom from me that they wanted I gave it to them. Because I love them I did it but I can't help thinking that it was all arranged by their loving mother just to get rid of the undesirable reminder...Me. She threw me out of our marriage and she threw me out of my children's lives as well. The lawmakers must do something to change and update the laws to stop this from being such an easy way to destroy someone emotionally and financially.

September 13, 1991

Robert A. Shupp Sr.
P.O. Box 435
Kresgeville, PA. 1833

RE: Domestic Relations, Monroe County

Suggestions:

1. The courts are already over crowded. Something must be done to alleviate the need to go before a judge and endure the additional expense of enforcing a court order. We have Domestic Relations to enforce support. Create a Domestic Enforcement office. When one of the parents are not following the court order for visitation that office should step in and intervene. Since domestic issues are often a potentially explosive situation having a place to go and air your grievances might diffuse a potentially dangerous situation. If one of the parents is violating the order then the other can bring it to the attention of the domestic enforcement office for investigation. They can determine under certain guidelines if the person making the claim has just cause. If the one parent continuously violates the order that office can levy a fine. They could authorize the police to take action if necessary. If they keep violating then that office could order the matter be brought before a judge the same way as domestic relations takes some of the burden off the judges. Petty grievances could be weeded out and hopefully settled. If the children are being put in the middle of the situation, counseling could be ordered for the parent(s).
2. The court system should not treat the non-custodial parent like a second rate citizen. America has a high rate of broken family units. It's very hard to start over and when you do and the court system fails you in the way it did me it's unjust. The court system under the guise of being overworked has become cold and unfeeling. Let's not undermine a good parent's right to be a parent to their child. The term of the judges should be made 6 years instead of 10. That might help keep them interested in doing the best possible job that they can and keep them on their toes a little more. If the courts are overcrowded then start having Night Court. This would make the most efficient use of the existing court rooms.
3. The court system should remember that even though we have problems we are still people just like they are. Even though the position of judge commands a certain amount of respect they should not forget that they owe the public the same, RESPECT. It should also not be who you know, but who you are.. a person, a human being, a parent.

IN THE COURT OF COMMON PLEAS
OF THE FORTY THIRD JUDICIAL DISTRICT
MONROE COUNTY, PENNSYLVANIA

ROBERT A. SHUPP, : NO. 2605 CIVIL 1980
Plaintiff, :
vs. : VISITATION - CUSTODY
CATHERINE E. (NYE) SHUPP, :
Defendant. :

PROTHONOTARY
1989 SEP 21 P 2:10
MONROE COUNTY PA

EXCEPTIONS TO SUPPORT MASTER'S FINDINGS AND RECOMMENDATIONS

NOW COMES Plaintiff, Robert Shupp, by and through counsel, David W. Skutnik, Esq., and respectfully files his exceptions to the Support Master's findings and recommendations as follows:

1. The Support Master erred in finding that there was no evidence presented to convince this Court that the Supreme Court guidelines should not be followed. On the contrary, Plaintiff avers that there was ample evidence to indicate that in his situation the guidelines should not be followed due to his present economic circumstances.

2. The Support Master erred in finding that Defendant has the right to choose medical care without consulting the Plaintiff unless her decisions are unreasonable in that Plaintiff does not have the opportunity to partake in the decision making process as to what physician or medical personnel are to see the children, and as such is forced to be responsible for medical payments which might be reduced by seeing different medical personnel. In other words, Plaintiff contends that he should have the same equal right as Defendant in choosing the appropriate medical personnel to care for the children. It should be further noted that the children

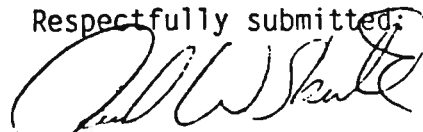
who are the subjects of the Support Order have chosen to alienate themselves from their father, and as such Plaintiff has no knowledge whatsoever as to the health and welfare of said children. He is therefore left in the dark as to their health needs until such time as a bill is presented to him for his share of the payment.

3. The Support Master erred in finding that Plaintiff should pay the sum of \$105.00 per week for the support of the minor children in that Plaintiff's present economic status does not provide him with sufficient funds to make such payments. Plaintiff reiterates his position set forth above that the Support Master erred in following the guidelines of the Supreme Court of Pennsylvania in that he is financially incapable of making the recommended payments.

4. The Support Master further erred in making the recommendation that \$105.00 per week be paid, and that in the event Defendant received the contemplated full time employment the weekly support should be reduced to \$95.00 per week effective the first day of school in that Defendant had already been hired by the Pleasant Valley School District prior to the date of the Support Hearing before the Master.

5. The Support Master erred in recommending that Plaintiff pay support to two children who for all intensive purposes have alienated themselves from their father and wish to have no contact whatsoever with him. It is believed that Defendant has had input in the children alienating themselves from their father, the Plaintiff to this matter.

Respectfully submitted:



David W. Skutnik, Esq.

COPY COURT OF COMMON PLEAS OF MONROE COUNTY
 FORTY-THIRD JUDICIAL DISTRICT
 COMMONWEALTH OF PENNSYLVANIA

CATHERINE E. SIGLIN, : No. 2605 Civil of 1980
 :
 Plaintiff :
 :
 vs. :
 :
 ROBERT A. SHUPP, :
 :
 Defendant : IN SUPPORT

O R D E R

PROTHONOTARY
 NOV 19 9 10 AM '90
 JUDICIAL CENTER, PA.

AND NOW, this *9th* day of November, 1990, it appearing that the Recommendation of the Support Master is consistent with the criteria set forth by our Supreme Court in Conway v. Dana, 456 Pa. 536, 318 A.2d 324 (1974) and by our Superior Court in Butler v. Butler, 339 Pa. Super. 312, 488 A.2d 1141 (1985) and the Guidelines set forth in Pa.R.C.P. 1910.16-1, Defendant's Exceptions to the Recommendation of the Support Master are dismissed and the prior Order of this Court dated September 13, 1990 is affirmed as the final Order in this proceeding.

BY THE COURT:

[Handwritten Signature]

J.

cc: Domestic Relations
 Richard D. James, Esquire (Master)
 Janet J. Siracuse, Esquire
 David W. Skutnik, Esquire



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF THE GOVERNOR
HARRISBURG

November 29, 1990

Kathleen Shupp
P.O. Box 435
Kresgeville, Pennsylvania 18333

Dear Mrs. Shupp:

Thank you for the recent letter to Governor Casey regarding your husband's child support claim and civil litigation. The letter has been forwarded to this office for response.

Unfortunately, we are not in a position to help. We cannot intercede in such civil court matters or provide legal advice. We can only suggest that your husband rely upon his attorney for information on how to appeal this matter.

Again, we regret that we cannot help you directly.

If you require further information, please do not hesitate to call the Governor's Action Center at (717) 783-1198.

Sincerely,

GOVERNOR'S ACTION CENTER

A handwritten signature in cursive script, appearing to read "Richard A. Maxwell".

Richard A. Maxwell
Administrative Officer

RAM/jsf

STUDENT DATA

SHUPP, ROBERT A. 5 P.O. Boy
 JAMES SIGLIN
 BOX 285
 MOUNTAINHOME PA 18342
*435
 18332*

SCHOOLS

93-100 DISTINGUISHED HONORS INCOMPLETE
 85-92 HONORS MEDICAL
 76-84 ACCEPTABLE WORK OUTSTANDING
 70-75 MARGINALLY PASSING SATISFACTORY
 60-69 FAILING WORK UNSATISFACTORY
 NR NO REPORT TELEPHONE 839-7121

STUDENT I.D.	LVL	HOUSE	HOMEROOM	BIRTH DATE	CNS.	TELEPHONE
092347	105		233	5/06/74		595-2099

STUDENT GRADE REPORT

SCHOOL MESSAGES

PLAN TO ATTEND THE HIGH SCHOOL
 MUSICAL: "HELLO DOLLY" - MARCH 29, 30, AND 31ST.

SUBJECT	TEACHER	COURSE NUMBER	CLASS ABS.	T-1	T-2	EXAM	SEM1	T-3	T-4	EXAM	FINAL	CREDITS	TEACHER COMMENTS
ENGLISH II	MR. LEWIS	142	01	83	83							1.000	COURTEOUS AND COOPERATIVE
WORLD CULTURES	MR. TETOR	242	03	91	97							1.000	
APP OF MATH I	MR. ARGUSHITES	344	03	87	93							1.000	
V.T.P.M	MRS. CADUE	972	00	89	89							3.000	
VO-TECH MATH 10	MRS. CADUE	979	00	78	79							.333	
DRIVER ED.	MR. HESS	092	01	89	93						91		
		005											

NO STUDENT, REGARDLESS OF AGE OR GRADE, MAY ACCUMULATE MORE THAN 25 DAYS OF ABSENCE PER YEAR.
 SPECIALS REGARDING EXTENDED ILLNESS, ACCIDENT, OR FAMILY EMERGENCY WILL BE HANDLED ON AN INDIVIDUAL BASIS.

SCHOOL ATTENDANCE RECORD	TERM: 1ST	2ND	3RD	4TH	TOTAL	PREVIOUS CREDITS EARNED: 6.000	CREDITS THIS YEAR		TOTAL CREDITS EARNED: 6.333
	ABS:	2.0			2.0		ATTEMPTED	EARNED	
	TARDY:						6.333	1.000	

IN THE COURT OF COMMON PLEAS OF THE 43RD JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA
MONROE COUNTY BRANCH - CIVIL

COMMONWEALTH OF PENNSYLVANIA	:	NO. 2605 CIVIL 1980
ex rel., ROBERT A. SHUPP	:	
	:	
vs.	:	
	:	
CATHERINE E. (NYE) SHUPP	:	VISITATION - CUSTODY
	:	

S T I P U L A T I O N

MRS. MILLER: Your Honor, in this matter of visitation, custody, and support, Mr. Karasek and I have worked out an agreement, and for protection of both parties I think it best to review it in their presence, as well as have it on the record.

We have agreed that this is based on the premise that the children, who are Courtney, age four, and Robert, age seven, wish to visit with their father. I do not think there is any question that Catherine has primary custody of them. In the event that they indicate to their father or mother that they do not wish to visit with their father, and the father wishes to talk to them directly, he will have the facility to do that either by phone, or in some way that it

can be done without any hostile problems between the parties.

Basically, Your Honor, what has been worked out is during the week Mr. Shupp would have the right to see the children one day a week from nine a.m. (9 a.m.) to six p.m. (6 p.m.), or from five p.m. (5 p.m.) to eight p.m. (8 p.m.), if there is a situation where he is working during the day, or the children are in school. This would be with twenty-four (24) hours notice to Mrs. Shupp, and also, Mr. Shupp would make arrangements to pick them up and deliver them back to Mrs. Shupp's residence.

Every other weekend he would have the children from nine a.m. (9 a.m.) to six p.m. (6 p.m.) for one day. This would be with three days notice to Mrs. Shupp. On the other weekends, he would be allowed to have them overnight from noon Saturday, until four p.m. (4 p.m.) Sunday. The overnight to specifically take place at the home of the paternal grandmother, Verna Shupp. This would also be with three days notice to Mrs. Shupp. Again, if for some reason this cannot be accomplished, if perhaps Mrs. Shupp has agreed to take the children out for the day, or whatever, this would be worked out between them, again, in a non-hostile, and civil manner.

For holidays, specifically for Thanksgiving, the wife would have the Thanksgiving holidays with the children. For Christmas, Mr. Shupp would have the children from one p.m. (1 p.m.) to five p.m. (5 p.m.). For Easter, Mr. Shupp would have the children from nine a.m. (9 a.m.) to five p.m. (5 p.m.). Again, the children are to be met by Mr. Shupp at Mrs. Shupp's home, and returned to her at her home, unless other arrangements are made.

MR. KARASEK: The children's birthdays are to have the same type of visitation as Christmas, which would be one p.m. (1 p.m.) to five p.m. (5 p.m.)

MRS. MILLER: If it is not a weekday where they are in school.

THE COURT: Then it would be in the evening; is that understood?

MR. SHUPP: Yes.

MRS. SHUPP: Yes.

MRS. MILLER: Now, pursuant to this, also, from henceforth, Mr. Shupp's support payments in the amount of one hundred and sixty dollars (\$160) a week will be made payable through the Monroe County Probation Office. He is presently

current, and the next payment would be due this Friday, which is tomorrow. ; Tomorrow may not be practical, but the first August payment is to be made through the Probation Office, and thenceforth through the Probation Office.

MR. KARASEK: Also, that this be reviewable in four months time, so if anything is not working out, it can be smoothed out, or if it is working it can be continued, or if perhaps it is not practical, we can work around those types of things.

MRS. MILLER: Again, this is based on the fact the children would want to see their father, and that neither parent attempts to implant in either of the children's minds any disparaging comments, or thoughts, or whatever against the other parent; that they work together.

MR. KARASEK: I would like to add, obviously, if the children are sick, or unable to keep a visit for some reason, that Mr. Shupp understand that, and that Mrs. Shupp also understand that some makeup arrangements should be made in some fashion or another.

Also, that the support payment that is being

entered into and paid is pursuant to a property settlement agreement entered into, and I would like to make sure that is keyed into that agreement for any purposes in the future that we may need it to date.

Other than that, this agreement states my understanding of what we agreed to. I would ask the Court to inquire of the parties if it is acceptable to them.

THE COURT: You have heard what was said here today, and you are agreeable to it?

MR. SHUPP: Yes.

THE COURT: And Mrs. Shupp, you are agreeable to what has been stated here today?

MRS. SHUPP: Yes.

O R D E R

AND NOW, July 30, 1981, the above stipulation of counsel is made an Order of this Court.

BY THE COURT:

Harold A. Brown
PROTHONOTARY
JUL 31 02 AM '81
MUNICIPAL COURT, PA.

CC: Ronold J. Karasek, Esq.
Linda W. Miller, Esq.
Probation
J.M., Court Reporter

PROPERTY SETTLEMENT AGREEMENT

THIS AGREEMENT, made this 23 day of February 1981, by and between ROBERT A. SHUPP, of the Town of Saylorburg, County of Monroe and Commonwealth of Pennsylvania, hereinafter referred to as "HUSBAND", and CATHERINE E./SHUPP, of the Town of Saylorburg, County of Monroe and Commonwealth of Pennsylvania, hereinafter referred to as "WIFE",

WITNESSETH:

WHEREAS, the Husband and Wife were duly married on the 28th day of July, 1973, in Brodheadsville, Pennsylvania, and there has been born to them two (2) children, namely Robert A., II, with a date of birth of May 6, 1974, and Courtney E., with a date of birth of October 19, 1977.

WHEREAS, in consequence of disputes and unhappy differences, the parties have finally separated on or about the 11th day of September, 1980, and are now not cohabiting and since their separation have agreed to continue to live separate and apart for the rest of their lives; and,

WHEREAS, the parties hereto are desirous of settling and adjusting all matters of whatever nature concerning their respective property rights in relation to each other; and

WHEREAS, it is the independent judgment of the

LAW OFFICES
TO. MARTINO
D KARASEK
MA STREET
EANGOR,
AMPTON COUNTY,
SYLVANIA 18018

parties a monetary amount of support as follows and this provision is a full and complete disposition of any claims of the Wife to support, alimony pendente lite, alimony after divorce and/or child support:

(a) The Husband will pay One Hundred Dollars (\$100.00) per week for the support of the Wife and minor children until the sale of the jointly held real estate hereinafter described.

(b) Upon the sale of the real estate, the Husband will pay One Hundred Sixty Dollars (\$160.00) per week for the support of the Wife and the minor children for a period of Three (3) years.

(c) Upon the expiration of the three (3) years, the Wife, under no circumstances, will be entitled to any further payments for her support, alimony pendente lite, and/or alimony after divorce, and the parties will attempt to amicably arrange a new monetary amount of support for the two (2) children only. In the event an amicable arrangement cannot be agreed to, a Petition for Support of the two (2) minor children only will be filed so as to permit a Court determination of this issue.

(d) PROVIDED FURTHER that during the aforementioned three (3) year period, any re-marriage of the Wife and/or any substantial increase or decrease in the income and/or expenses of the parties, which would warrant a change in the aforementioned

(b) The Husband and Wife do hereby acknowledge that they have heretofore divided the marital personalty including, but without limitation, jewelry, clothes, furniture, appliances, tools, antiques, bank accounts, stocks, lands and the like, and hereafter, the Wife agrees that all of the property in the possession of the Husband shall be the sole and separate property of the Husband, and the Husband agrees that all property in the possession of the Wife shall be the sole and separate property of the Wife. Each of the parties does hereby specifically waive, release, renounce and forever abandon whatever claims, if any, she or he may have with respect to any of the above items, which are the sole and separate property of the other.

10. The parties hereby further agree that for Federal, State and Local personal income tax purposes, they will file a joint return for the 1980 tax year and any refund or liability in regard to the 1980 tax year shall be shared equally between the parties. Further, the parties agree that for the succeeding tax years, beginning with the 1981 tax year and thereafter, the Husband shall be entitled to claim the deduction for the children as dependents.

11. If the Husband or Wife fails in the due performance of any of his or her obligations hereunder, either party shall have the rights, at his or her election, to sue for damages for a breach hereof, or to rescind this Agreement, or

DAVID W. SKUTNIK

Attorney at Law

Suite 4
Carriage House Square

(717) 620-1520

RR #2, Box 2479 • Route 115
Effort, Pennsylvania 18330

COPY

February 9, 1990

Lockwood & Siracuse
Shearson Building
701 Main Street
P. O. Box 608
Stroudsburg, Pa. 18360

Att: Janet Siracuse, Esq.

RE: Robert Shupp/Kathy Shupp
File #89-130

Dear Janet:

The purpose of this letter is to follow up our conversation of a couple of weeks ago concerning this matter. Subsequent thereto, I discussed this matter with my client and he advised me that he has not been able to have contact with his children.

I recall our conversation at which time you indicated to me that your client does not wish to deny Mr. Shupp access to the children. It appears that we have a conflict in the matters being related to us by our clients.

I would like to resolve this matter quickly and amicably. My client has indicated to me that he would like to see the children and speak to them at my office. He further indicated to me that he would not have any objections to either you or Domenick being present during the conversation.

Would you please discuss this matter with your client and advise me of her position.

Thank you.

Very truly yours,

David W. Skutnik, Esq.

DWS:rs

CC: Mr. Robert Shupp

IN THE COURT OF COMMON PLEAS OF MONROE COUNTY
FORTY-THIRD JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA

ROBERT A. SHUPP,	:	No. 2605 Civil 1980
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
CATHERINE E. (NYE) SHUPP,	:	VISITATION - CUSTODY
	:	
Defendant.	:	

STIPULATION

ROBERT A. SHUPP, Plaintiff, DAVID W. SKUTNIK, ESQUIRE, counsel for Plaintiff, CATHERINE NYE SIGLIN, Defendant, and her counsel JANET J. SIRACUSE, hereby STIPULATE AND AGREE to the following terms and conditions regarding the custody and visitation of ROBERT A. SHUPP II (date of birth 5-6-74) and COURTNEY E. SHUPP (date of birth 10-19-77):

1. Catherine Nye Siglin (hereinafter "Mother") shall maintain primary custody of the children.
2. ROBERT A. SHUPP (hereinafter "Father") shall be entitled to liberal visitation with either or both children at such times and places as may be agreed upon by Father and either or both children.
3. In light of the ages of the children and their increasing number of school, employment and social interests, the children shall not be compelled under any circumstances to adhere to a formal visitation schedule.

4. Father shall not compel nor allow any other party to compel the children to be placed in a position requiring either of them to take responsibility for any other minor child during any period of visitation. It is specifically agreed that neither child will be required to babysit any other child during the visitation periods.

5. Father will continue to be solely responsible for transporting the children to and from periods of visitation unless otherwise agreed between Father and ROBERT A. SHUPP, II.

6. It is further agreed that the parties will adhere to the above-stated terms effective immediately upon execution of this Stipulation.

ROBERT A. SHUPP

DAVID W. SKUTNIK, ESQUIRE

CATHERINE NYE SIGLIN

JANET J. SIRACUSE

CATHERINE E. SIGLIN
Plaintiff
VS
ROBERT SHUPP
Defendant

COURT OF COMMON PLEAS OF MONROE COUNTY
43rd JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA
NO. 2605 Civil 1980

ORDER OF COURT

AND NOW, to wit, this 13th day of September, 19 90, upon consideration of the attached recommendation,

Defendant shall pay the sum of \$105.00 per week for support of two children, Robert and Courtney, and \$.50 per week service charge. Plaintiff shall be responsible to provide medical insurance. Defendant shall pay 1/2 of all medical, hospital, dental, eye care and prescription expenses of the children not covered by insurance. This order is effective May 23, 1990. Defendant shall pay \$10.00 per week on arrears until they are paid in full. In the event the Plaintiff receives the contemplated full time employment, the weekly support shall be reduced to \$95.00 per week effective as of the first day of school and the remaining portion of the order shall remain in force. Court costs are assessed to Defendant.

All payments to be made through the Monroe County Domestic Relations Office, Court House, P.O. Box 777, Stroudsburg, PA 18360. It is further ordered that if the Defendant is in arrears in an amount equal to or greater than one month's support obligation, the Defendant's income shall be attached. It is further ordered that the parties report in writing or by personal appearance to the Domestic Relations Office all changes in address, employment, income or address of any child receiving support. Failure of either party to inform the Domestic Relations Office of the required information, the Court may adjudge the party to be in Contempt of Court pursuant to Rule 1910.21 and may order the party to be punished by one or more of the following: jail, fine or probation.

In accordance with PA R.C.P. 1910.12, filing of exceptions does not stay this Order. If exceptions are not filed within a ten (10) day period, this Order is final.

BY THE COURT:

[Handwritten Signature]
_____ J.

ATHERINE E. SIGLIN
Plaintiff
VS
FERT SHUPP
Defendant

COURT OF COMMON PLEAS OF MONROE COUNTY
43rd JUDICIAL DISTRICT
COMMONWEALTH OF PENNSYLVANIA
NO. 2605 CIVIL 1980

DATE OF HEARING: August 28, 1990
PURPOSE OF HEARING: Plaintiff filed Petition for increase

FINDINGS OF FACT AND RECOMMENDATION BY HEARING OFFICER

Plaintiff

Defendant

ATTORNEY: _____
ADDRESS: P.O. Box 285
Mountainhome, PA 18342
EMPLOYER: Colonial Northampton Intermediate
Unit #20
INCOME: \$686.89 gross biweekly
Overtime considered: Yes () No (X)
Income verified: Yes (X) No ()
MEDICAL INSURANCE PROVIDED: Yes (X) No ()
RE/MARRIED: Yes (X) No ()
SPOUSE'S INCOME: \$4,358.34 gross per month
ATTENDED PRE-HEARING CONFERENCE: Yes (X) No ()
DATE OF MARRIAGE: July 28, 1973
DATE OF DIVORCE: May 4, 1981
NUMBER OF CHILDREN ELIGIBLE FOR SUPPORT: 2
CHILDREN'S EXPENSES: \$2,242.67 per month
UNUSUAL CIRCUMSTANCES OF CHILDREN:

David Skutnik, Esq.
P.O. Box 435
Kresgeville, PA 18333
Stauffer Concrete Products
(Collects Unemployment about 3 months)
Average \$557.27 gross per week
Yes (X) No ()
Yes (X) No ()
Yes (X) No ()
Yes (X) No ()
\$1,360.00 gross per month
Yes (X) No ()
PLACE: Brodheadsville, PA
PLACE: Monroe County, PA
AGES OF CHILDREN: 16 - 12½

CURRENT SUPPORT ORDER:
January 2, 1985 - Pursuant to agreement of parties, Defendant was directed to pay \$60.00 per week for support of two children, allocated \$30.00 per child, plus the service charge of \$.50 per week; effective December 13, 1984.

Siglin vs Shupp

DOMESTIC RELATIONS RECOMMENDATION:

In accordance with the guidelines, suggest Defendant be directed to pay \$105.00 per week for support of two children plus Defendant be responsible for $\frac{1}{2}$ of any non-covered medical, hospital, dental, and eye care plus $\frac{1}{2}$ of total cost of non-covered braces for son, \$587.50 due from Defendant. Plaintiff shall continue to provide medical and hospitalization insurance.

MASTER'S FINDINGS AND RECOMMENDATION:

No evidence was presented to convince this Court that the Supreme Court Guidelines should not be followed. It is noted that the Domestic Relations Office Recommendation is based upon Defendant's net income at \$395.14 per week. Defendant testified to a net income of \$410.00 per week.

As the custodial parent, Plaintiff has a right to choose medical care without consulting the Defendant unless her decisions are unreasonable.

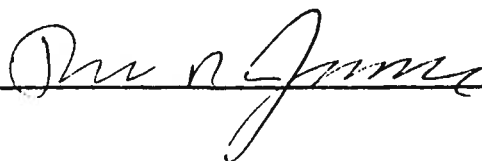
Defendant shall pay the sum of \$105.00 per week for support of the minor children. Plaintiff shall be responsible to provide medical insurance. Defendant shall pay $\frac{1}{2}$ of all medical, hospital, dental, eye care and prescription expenses of the children not covered by insurance. This order is retroactive to the date of filing. Defendant shall pay \$10.00 per week on arrearages until they are paid in full.

In the event the Plaintiff receives the contemplated full time employment, the weekly support shall be reduced to \$95.00 per week effective as of the first day of school. The remaining portion of the order shall remain in force.

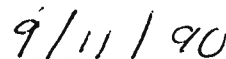
NOTICE

YOU ARE ADVISED THAT YOU HAVE TEN (10) DAYS IN WHICH TO FILE EXCEPTIONS TO THE MASTER'S REPORT AND RECOMMENDATION FILED IN THE ABOVE CAPTIONED MATTER. IF YOU DO NOT FILE THESE EXCEPTIONS WITHIN THE ALLOTTED TIME PERIOD, THE ORDER OF COURT WILL BE FINAL.

RECOMMENDED BY:



DATE:



Siglin vs Shupp
 Court date: 8/28/90
 Number of Children: 2

SUPPORT GUIDELINE COMPUTATION
CHILD SUPPORT

	OBLIGOR (Defendant)	OBLIGEE (Plaintiff)
1. Total Gross Income per pay period from employment	\$ <u>557.27/wk</u>	\$ <u>686.89 biweekly</u>
2. Less Deductions:		
Federal, State, & Local Taxes	- <u>119.50</u>	- <u>99.29</u>
F.I.C.A. & Non-voluntary retirement payments	- <u>42.63</u>	- <u>53.55</u>
Union dues	- _____	- _____
Health insurance premiums for other party or the children	- _____	- _____
3. Net Income from employment	\$ <u>395.14/wk</u>	\$ <u>535.05 biweekly</u>
4. Plus other income:		
Business or property dealings income	\$ _____	\$ _____
Interest, rents, royalties, dividends	\$ _____	\$ _____
Pensions and all forms of retirement	\$ _____	\$ _____
Estate or trust income	\$ _____	\$ _____
Social Security benefits	\$ _____	\$ _____
Workmen's/unemployment compensation	\$ _____	\$ _____
5. Conversion to Monthly Amount (if pay period is other than monthly)	\$ <u>1712.27</u>	\$ <u>1159.28</u>
6. Combined Total Monthly Net Income	\$ <u>2871.55</u>	
7. Proportionate Expenditure (Determined from the Chart of proportionate expenditures in subdivision (b) of the rule.)	x <u>26.7%</u>	
8. Basic Child Support (Line 6 multiplied by line 7)	\$ <u>766.70</u>	
9. Additional Support if required	+ _____	
10. Total Support	\$ <u>766.70</u>	
11. Net Income expressed as a percentage of the Combined Amount (Line 5 divided by Line 6 multiplied by 100)	<u>60%</u>	<u>40%</u>
12. Each Parent's Obligation (Line 10 multiplied by line 11)	\$ <u>460.02</u>	\$ <u>306.68</u>
13. Obligor's Support Obligation is \$ <u>460.02</u> monthly, payable \$ <u>106.16</u> per <u>week</u> (convert to actual pay periods).		