

**Andrew D. Chrzan v.**

**Monica R. Chrzan**

**No. FD22-008106-002**

**NOTICE OF INTENTION**

**TO FILE THE PRAECIPE**

**FOR ORDER APPROVING**

**GROUND FOR DIVORCE**

TO: Monica R. Chrzan,

Defendant

You have been sued in an

action for divorce. You have

failed to answer the complaint

or file a counter-affidavit to the

Affidavit under §3301(d) of the

Divorce Code. Therefore, on or

after August 28, 2024, the

other party can request the

court to enter a final decree in

divorce or, if there are

unresolved ancillary claims, an

order approving grounds for

divorce as indicated on the

proposed Praecipe to Transmit

Record, which is attached. If

you do not file an answer with

your signature notarized or

verified or a counter-affidavit

by the above date, the court

can enter a final decree in

divorce or, if there are

unresolved ancillary claims, an

order approving grounds for

divorce. A counter-affidavit

that you may file is attached

to this notice. Unless you have

already filed with the court a

written claim for economic

relief, you must do so by

above date, or the court may

grant the divorce or an order

approving grounds for divorce

and you may lose forever the

right to ask for economic

relief. The filing of the form

counter-affidavit alone does

not protect your economic

claims.

YOU SHOULD TAKE THIS

PAPER TO YOUR LAWYER AT

ONCE. IF YOU DO NOT HAVE A

LAWYER, GO TO OR

TELEPHONE THE OFFICE SET

FORTH BELOW. 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

AGENCIES THAT MAY OFFER

LEGAL SERVICES TO ELIGIBLE

PERSONS AT A REDUCED FEE

OR NO FEE.

LAWYER REFERRAL SERVICE

ALLEGHENY COUNTY BAR

ASSOCIATION

11TH FLOOR KOPPERS

BUILDING

436 SEVENTH AVENUE

PITTSBURGH, PA 15219

TELEPHONE: (412) 261-5555

**Andrew D. Chrzan v.**

**Monica R. Chrzan**

**No. FD22-008106-002**

**COUNTER-AFFIDAVIT**

**UNDER § 3301(d) OF THE**

**DIVORCE CODE**

1. Check either (a) or (b):

\_\_\_ (a). I do not oppose the

entry of a divorce decree.

\_\_\_ (b) I oppose the entry of a

divorce decree because

(Check (i), (ii), (iii), or all):

\_\_\_ (i) The parties to this action

have not lived separate and

apart for the required

separation period: two year

for parties that separated prior

to December 5, 2016, and one

year for parties that separated

on or after December 5, 2016.

\_\_\_ (ii) The marriage is not

irretrievably broken.

\_\_\_ (iii) There are economic

claims pending.

2. Check (a), (b) or (c):

\_\_\_ (a) I do not wish to make

any claims for economic relief.

I understand that I may lose

rights concerning alimony,

division of property, lawyer's

fees or expenses if I do not

claim them before a divorce is

granted.

\_\_\_ (b) I wish to claim

economic relief which may

include alimony, division of

property, lawyer's fees or

expenses or other important

rights.

**I UNDERSTAND THAT IN**

**ADDITION TO CHECKING (b)**

**ABOVE, I MUST ALSO FILE**

**ALL OF MY ECONOMIC**

**CLAIMS WITH THE**

**PROTHONOTARY IN**

**WRITING AND SERVE THEM**

**ON THE OTHER PARTY. IF I**

**FAIL TO DO SO BEFORE THE**

**DATE SET FORTH ON THE**

**NOTICE OF INTENTION TO**

**REQUEST DIVORCE DECREE,**

**THE DIVORCE DECREE MAY**

**BE ENTERED WITHOUT**

**FURTHER NOTICE TO ME,**

**AND I SHALL BE UNABLE**

**THEREAFTER TO FILE ANY**

**ECONOMIC CLAIMS.**

\_\_\_ (c) Economic claims have

been raised and are not

resolved.

I verify that the statements

made in this counter-affidavit

are true and correct. I

understand that false

statements herein are made

subject to the penalties of 18

Pa. C.S. § 4904, relating to

unsworn falsification to

authorities.

Date: \_\_\_

Daniel J. Doffin, Defendant

**NOTICE: IF YOU DO NOT**

**WISH TO OPPOSE THE**

**ENTRY OF A DIVORCE**

**DECREE AND YOU DO NOT**

**WISH TO MAKE ANY CLAIM**

**FOR ECONOMIC RELIEF,**

**YOU SHOULD NOT FILE THIS**

**COUNTER-AFFIDAVIT.**

**Andrew D. Chrzan v.**

**Monica R. Chrzan**

**No. FD22-008106-002**

**PRAECIPE FOR ORDER**

**APPROVING GROUNDS**

TO THE DEPARTMENT OF

COURT RECORDS:

Transmit the record, together

with the following information,

to the court for entry of:

1 an order approving grounds

for divorce with the Court

retaining jurisdiction over

unresolved ancillary claims.

1. Ground for Divorce:

Irretrievable breakdown

under:

1 §3301(d)

2. Service of the Complaint:

(a) Date served: June 25, 2022

(b) Manner of service:

Defendant was served by

certified mail, restricted

delivery on June 25, 2022 and

an Affidavit of Service was

filed with the Department of

Court Records on July 2022

3. Section 3301(c)(1) or (2) of

the Divorce Code:

Plaintiff: N/A

Defendant: N/A

Section 3301(d) of the Divorce

Code:

(1) The date the Affidavit under

§3301(d) of the Divorce Code

was signed: March 20, 2024

(2) Date of filing and manner of

service of the Affidavit under

§3301(d) of the Divorce Code

and blank Counter-Affidavit

under §3301(d) of the Divorce

Code upon the other party:

filed: March 20, 2024; Service:

Counsel for Defendant was

personally served on June 11,

2024 and pursuant to Order of

Court entered July 9, 2024

4. Related ancillary claims

pending: Equitable Distribution

5. Complete either (a) or (b).

(a) Notice of Intention to File

the Praecipe to Transmit

Record:

(1) Date served: .

(2) Manner of service: .

(b) The date of filing of the

party's Waiver of Notice of

Intention to File the Praecipe

to Transmit Record: