

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

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|---|---|-----------------------|
| KERRY-ANN MORRIS, PLAINTIFF (Mother) | : | FAMILY COURT DIVISION |
| vs. | : | |
| LOREENE LENT DEFENDANT (Maternal Grandmother) | : | CIVIL ACTION |
| DWAINE GORDON CO-DEFENDANT (Father) | : | D.R. No. 0C0700598 |

STIPULATION FOR AN AGREED ORDER OF CUSTODY

AND NOW, Plaintiff, Kerry-Ann Morris, represented by Tejal V. Patel, Esquire, Defendants Loreene Lent, *pro se*, and Dwaine Gordon, *pro se*, file this Stipulation for an Agreed Order of Custody, and in support thereof aver the following:

1. Plaintiff Kerry-Ann Morris is the mother of the child and resides at 2155 Milford Square Pike, P.O. box 208, Milford Square PA, 18935.
2. Defendant Loreene Lent (hereinafter “Maternal Grandmother”) is the maternal grandmother of the child and currently resides at 8301 Presidents Drive. Apt 302, Hummelstown, PA 17036.
3. Co-Defendant Dwaine Gordon is the father of the child and currently resides at 585 E16 Street, Brooklyn, NY 11226.
4. The minor child who is the subject of this Order is Kayla N. Gordon, born 1/30/1997.
5. Mother and Father shall share legal custody.
6. Mother shall have primary physical custody.
7. Mother and Father shall have liberal partial custody as the parties agree.
8. Father may visit with child and child may visit and stay with the Father.

9. The parties agree that the terms of this Stipulation are in the best interest of the child and request that the terms and conditions of this Stipulation be made an Order of the Court.

WHEREFORE, the parties intend to be bound by this agreement and ask that it be made an Order of the Court.

Kerry-Ann Morris

Notary Public

Date

Seal:

Loreene Lent, *pro se*

Notary Public

Date

Seal:

Dwayne Gordon, *pro se*

Notary Public

Date

Seal: