
COMMONWEALTH OF PENNSYLVANIA
DELAWARE COUNTY

VS.

MARK LEDDEN, Plaintiff

(MODIFICATION of VISITATION)

Mark J. Ledden
Plaintiff

.vs

Denise Escher
Defendant

:
:
:

Civil Action

D.K No.

I Facts

Plaintiff, pro se, a state prisoner hereby requests the court to appoint counsel and moves for modification of visitation order review and clarity, pursuant to PA R.C.P rule 1915.15 and represent

- 1) The defendant has full custody of the children in question.
- 2) Both children were born during the plaintiff's and defendant's engagement and wedlock.
- 3) Defendant above named is natural biological mother of the two children Ivan Mark Ledden, age 10 and Brock Jason Ledden, age 7

4) Plaintiff above named is the natural and biological father of above named children now residing with the natural biological mother. The defendant/mother is residing at an unknown address, but is using her mother's address (grandmother for custody purposes for this court only).

II Visitation

- 1) Plaintiff seeks visitation of his children Ivan Mark Ledden and Brock Jason Ledden
- 2) Not limited to mail correspondence from both children. From and between father to children and children to father. Not limited to any change in address on or with either parties involved.
- 3) Phone calls to children Ivan Mark Ledden and Brock Jason Ledden on birthdays, Holidays and weekends. Phone number to be provided by the court not limited to number change notice.
- 4) Copies of both children Ivan and Brock Ledden mental and physical health records, updated semi-annually.
- 5) A copy of year end academics, records and reports within the summer ending school year.

III Facts

- 1) The defendant has full custody of the children in question.
- 2) Both children were born during plaintiff's and defendant's engagement and wedlock
- 3) Plaintiff is currently indigent and if the court will request

psychological examination and/or testing. Plaintiff respectfully requests the court have the Commonwealth of Pennsylvania pay for the said examinations and/or testing.

- 4) Defendants insurance provider to cover cost
- 5) Both defendant and defendant's husband are employed union school teachers with health care plans in place.
- 6) Plaintiff will use SCI Somerset Psych department per court's request. Court request to SCI Somerset
- 7) Plaintiff and defendant have been divorced since April of 2012
- 8) Plaintiff is the natural biological father of both children, Ivan and Brock Ledden and is listed on both children's birth certificates.
- 9) Plaintiff is fully disabled due to his chronic medical conditions and is on full disability Social Security for same

IV Grandparent visitation/contact

1) Plaintiff additionally requests this court will be court authorization for his father, Jay H. Ledden, Jr. to be permitted to bring his minor children to visit plaintiff at Somerset SCI. Jay H. Ledden, Jr. is the biological grandfather to Ivan Mark Ledden and Brock Jason Ledden. Jay H. Ledden, Jr. is a 69 year old white male, retired from government service comprised of many years in the U.S. Navy, and civilian service for the U.S. Air Force(Pentagon), U.S. Customs Service and the U.S. Dept. of Commerce as well as having most recently been an all American Commander of the VFW in Edinboro, PA.

Jay H. Ledden, Jr. lives at 228 E. State St., Albion, PA 16401,
Phone # 814 756 3173(H) and 814 521 5844(C)

VI Rational for Modification

1) Plaintiff has participated in litigation concerning the custody of his children in this court. And, defendant was awarded temporary full custody of both children.

2) Plaintiff believes that the best interest and welfare of his children will be served by granting mail correspondence between father and children and the children and father. Telephone calls to his children on weekends, birthdays and Holidays such as Christmas.

Copies of any and all medical records, mental and physical health records provided quarterly. Copies of report cards within the summer ending school year and visitation during a week period over the summer months with their grandfather Jay H. Ledden, Jr. with medical treatment provisions provided should an emergency arise.

Plaintiff believes it would be not only healthy but helpful to have a relationship with their natural biological father, as opposed to no relationship during the developmental years of life.

IV CLOSING

Plaintiff believes his request will not be detrimental or abrasive to the children, Ivan Mark Ledden and Brock Jason Ledden. To the contrary, correspondence, phone contact, Holiday and birthday cards and visitation will create a smoother transition upon plaintiff's release. Plaintiff has never been anything other than a concerned parent for his children.

Wherefore plaintiff has a right to visitation through the supervision of his father and contact with his children. In the best interest of the children.

Date

12/19/12

Respectfully submitted
Mark Jason Ledden



Mark J. Ledden, JK 8474
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Somerset, PA 15510