

FILED IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
BEFORE THE CLERK
JUN 25 AM 10:22 20 SP 703

2020 JUN 25 A 10: 22

CONFIDENTIAL - C.S.C.
BY SPD

**ORDER
FOR SERVICE OF PROCESS
BY PUBLICATION**

(Full name by which adoptee is to be known if adoption granted)

This the 25 day of June, 2020.

Shante E. Wilson
Assistant Clerk of Superior Court

GUILFORD COUNTY

JONATHAN DAVID KUHN

(Full name of petitioning father/mother)

FILED

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
BEFORE THE CLERK
8 20 SP 703

2020 JUN 24 A 9:38

WILFORD CO., C.S.C.

BY me

FOR THE ADOPTION OF

SETH RENEIR KUHN

(Full name by which adoptee is to be known if adoption granted)

**MOTION
FOR SERVICE OF PROCESS
BY PUBLICATION WITH
PROOF OF DUE DILIGENCE**

MOTION

NOW COMES PETITIONER, JONATHAN DAVID KUHN who submits the Application for Order for Service by Publication.

FACTS OF THE CASE

This case is related to the adoption of a minor child as described in the Petition for Adoption of a Minor Child (Stepparent). Petitioner is unable to locate the Respondent, "Any potential/possible father" (see Exhibit "A").

REQUEST

Petitioner has been unable to locate or effect service of process on the unknown father in the above-captioned case. Petitioner hereby requests that the Court issue an Order for Service by Publication for a minimum period of once a week for three (3) consecutive weeks in the online legal notice publication, *Global Legal Notices®*, a website of general circulation in The Philippines and surrounding regions which

numerous benefits over traditional print newspapers (see Exhibit "B"). Their publication policy is to publish the Order, any notices, and all court-issued documents continuously for a period of three (3) consecutive weeks.

ARGUMENT

The father of said child is unknown, therefore, Petitioner has no ability to successfully utilize traditional service of process methods. An unknown father is unavailable for service of process.

The most practical available alternative method of service in such situation is service by publication. The only known method for service by publication in The Philippines is through *Global Legal Notices*® which provides a more thorough method to give actual notice to the Respondent, an unknown father, as described on their legal notice website at www.GlobalLegalNotices.com.

This method allows for a greater opportunity to give actual notice to the unknown father, the Respondent, than service by publication in a traditional newspaper. It provides publication of the Court Order, plus the entire set of Court-issued documents. Further, the publication period exceeds the customary once a week for three (3) consecutive weeks by continually publishing the documents for an indefinite period, as allowed by law or necessity. In addition, a Google search

by the Defendant's name and country will typically appear on page one of the Google search after approximately five (5) days, thus, providing a greater opportunity to give actual notice to the Respondent, the unknown father.

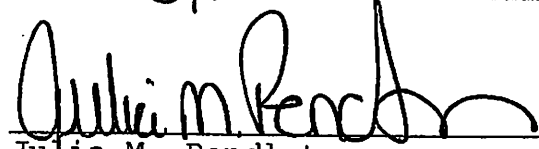
CONCLUSION

Global Legal Notices® offers an improved method of providing actual notice to a Respondent of a pending lawsuit while satisfying the Court's requirements for service by publication.

It is widely held that service by publication has a limited success rate in providing actual notice to a Respondent that a legal case is pending. Yet, courts routinely issue an order allowing for service by publication in a newspaper, either print or online, as a last resort method to complete service of process.

Wherefore, Petitioner respectfully requests that the Court issue an Order for Service by Publication in this case.

This the 22nd day of June, 2020.



Julia M. Pendleton
Attorney for Petitioner

STATE OF NORTH CAROLINA
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
BEFORE THE CLERK

JONATHAN DAVID KUHN APR 23 P 2:52

20 SP 703

Full name of petitioning parent GUILFORD COUNTY, N.C.

BY [Signature]

**PETITION FOR ADOPTION
OF A MINOR CHILD
(STEPPARENT)**

**FOR THE ADOPTION OF
SETH RENEIR KUHN**

(Full name by which adoptee is to be known if adoption granted)

To the Honorable Clerk of the Superior Court of GUILFORD County:
I, the undersigned, JONATHAN DAVID KUHN, M
Name of petitioning parent (Sex)

whose address is:

7705 PERTSHIRE DRIVE, OAK RIDGE, GUILFORD, NC 27310
(Street & Number) (RFD) (City) (County) (State) (Zip Code)

do hereby petition the Court to adopt SETH RENEIR KUHN
(Name by which the adoptee is to be known)

a M minor child, and do represent to the Court:
(Sex)

1. That the petitioner herein seeking adoption ☒ has lived in or been domiciled in North Carolina for at least six consecutive months immediately preceding the filing of this Petition; or ☐ the adoptee has lived in North Carolina for at least six consecutive months immediately preceding the filing of this Petition or from birth.

2. That the petitioner's spouse is the parent of the adoptee and has had legal and physical custody of the child since APRIL 1, 2007 under the following circumstances: NO FATHER IS KNOWN OF THE MINOR CHILD

The child has resided primarily with this parent and the petitioner during the six months immediately preceding the filing of the Petition, or a waiver of that requirement is sought under G.S. 48-4-101(3) for the reasons set out in #13 below;

3. That all necessary consents, relinquishments, or terminations of parental rights have or will be obtained and will be filed as additional documents with the Petition; that all necessary parties to this proceeding are properly before the Court or a document listing the names of any other individuals whose consent or termination of rights may be necessary but has not been obtained is attached.

4. That the adoptee was born in the State/Country of PHILLIPPINES on or about the 1 day of APRIL, 2007.

5. That as far as petitioner is able to ascertain, said minor child is the owner of or is entitled to personal property of the value of \$⁰ and real property of the value of \$⁰, described as follows:

6. That the affidavit required by the Uniform Child Custody Jurisdiction Act, N.C.G.S. 50A-1, et. seq., if applicable, is attached to the Petition.

7. That petitioner seeking adoption herein is presently [single] [married] MAY 22, 2014
(Date of Marriage to Parent of Adoptee)
ROSANNA MORANO KUHN FEMALE
(Name of Spouse) (Sex);
and, if applicable _____
(Date Marriage Terminated by Death of Parent of Adoptee)

8. That petitioner desires and agrees to adopt and treat the adoptee as the petitioner's lawful child and desires that the relationship of parent and child be established between him/her and said child; and upon adoption, the said adoptee shall inherit real and personal property by, through, and from the said petitioner in accordance with the statutes of descent and distribution.

9. Enter any special allegation not yet given, such as child over 12 years of age, whether spouse is deceased or has been adjudicated incompetent, waiver sought under G.S. 48-4-101(3), etc.

THE CHILD IS OVER THE AGE OF 12 AND CONSENTS TO THE ADOPTION

THERE IS NO FATHER LISTED OR KNOWN OF THE MINOR CHILD

WHEREFORE, YOUR petitioner prays that the relationship of parent and child be established between petitioner and said adoptee; and that the name of said adoptee be changed to SETH RENIER KUHN

as hereinabove written and authorized by law.

Attachments to Petition (N.C.G.S. 48-2-305): _____

CERTIFIED BIRTH CERTIFICATE, CERTIFIED MARRIAGE LICENSE, CONSENT BY PARENT, CONSENT BY ADOPTEE

This 21st day of APRIL, 2020

TAMMY A. HALE
NOTARY PUBLIC
ROCKINGHAM COUNTY, NC
Commission Expires 3/24/2021

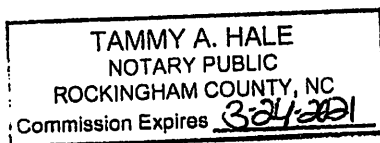
[Signature] Petitioner

JONATHAN DAVID KUHN

being duly sworn, depose and say

Full name of petitioning parent

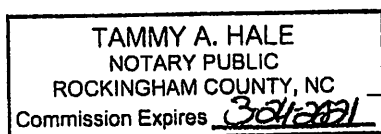
that He has read the foregoing Petition and that the facts set forth therein are true to His own knowledge, except as to matters therein set forth upon information and belief, and as to such matters He believes them to be true.



[Signature] Petitioner

Subscribed and sworn to before me this 21 day of April, 2020

(S E A L)



Tammy A. Hale
Clerk Superior Court of Notary Public

My commission expires March 24, 2021

JULIA M. PENDLETON

Attorney for Petitioner

336-369-0284

(Telephone Number)

7 CORPORATE CENTER COURT, SUITE B

(Mailing Address)

GREENSBORO, NC 27408

(City or Town)

NOTE:

The DSS-5162 is prepared in triplicate. The original form is held in the Office of the Clerk of Superior Court; a copy is forwarded within ten days by the Clerk of Court to the Division of Social Services, State Department of Health and Human Services; and a copy is attached to the Order for a Report to the Court which is directed to the county department of social services or licensed private child-placing agency.

Municipal Form No. 102
(Revised January 1993)

(To be accomplished in quadruplicate)

Republic of the Philippines
OFFICE OF THE CIVIL REGISTRAR GENERAL
CERTIFICATE OF LIVE BIRTH

(Fill out completely, accurately and legibly. Use ink or typewriter.
Place X before the appropriate answer in Items 2, 5a, 5b and 18a.)

Province AGUSAN DEL NORTE
City/Municipality BUTUAN CITY

Registry No. 207-2009

REMARKS/ANNOTATION

2020 APR 23 P 2:52

GUILFORD COUNTY, C.S.C.

BY

C H I L D	1. NAME (First) (Middle) (Last) SETH RENEIR MORANO		
	2. SEX <input checked="" type="checkbox"/> 1 Male <input type="checkbox"/> 2 Female	3. DATE OF BIRTH (day) (month) (year) 01 APRIL 2007	
	4. PLACE OF BIRTH (Name of Hospital/Clinic/Institution) (City/Municipality) (Province) House No., Street, Barangay MOTHER'S HEALTH 1st BIRTHING HOME - OCHOA AVENUE, BUTUAN CITY		
	5a. TYPE OF BIRTH <input checked="" type="checkbox"/> 1 Single <input type="checkbox"/> 2 Twin <input type="checkbox"/> 3 Triplet, etc. b. IF MULTIPLE BIRTH, CHILD WAS <input type="checkbox"/> 1 First <input type="checkbox"/> 2 Second <input type="checkbox"/> 3 Others, Specify		
M O T H E R	c. BIRTH ORDER (live births and fetal deaths including this delivery) (first, second, third, etc.) SECOND		d. WEIGHT AT BIRTH 2948 grams
	6. MAIDEN NAME (First) (Middle) (Last) ROSANNA SALAUM MORANO		
	7. CITIZENSHIP <u>FILIPINO</u>		
	8. RELIGION <u>ROMAN CATHOLIC</u>		
F A T H E R	9a. Total number of children born alive: <u>02</u>	b. No. of children still living including this birth: <u>02</u>	c. No. of children born alive but are now dead: <u>0</u>
	10. OCCUPATION <u>HOUSEWIFE</u>		11. Age at the time of this birth: <u>22</u> years
	12. RESIDENCE (House No., Street, Barangay) (City/Municipality) (Province) Purok 2-B, Brgy. 1 SAN FRANCISCO - AGUSAN DEL SUR		
	13. NAME (First) (Middle) (Last) N/A		
14. CITIZENSHIP <u>N/A</u>		15. RELIGION <u>N/A</u>	
16. OCCUPATION <u>N/A</u>		17. Age at the time of this birth: _____ years	

18. DATE AND PLACE OF MARRIAGE OF PARENTS (If not married, accomplish Affidavit of Acknowledgment/Admission of Paternity at the back.)
N/A

19a. ATTENDANT
☒ 1 Physician ☐ 2 Nurse ☐ 3 Midwife
☐ 4 Healer (Traditional Midwife) ☐ 5 Others (Specify)

19b. CERTIFICATION OF BIRTH
I hereby certify that I attended the birth of the child who was born alive at 3:14 A.M. o'clock
am/pm on the date stated above.

Signature GERALDINE P. ALBAS M.D.
Name in Print GERALDINE P. ALBAS M.D.
Title or Position ATTENDING PHYSICIAN

Address BUTUAN CITY
Date APRIL 2, 2007

20. INFORMANT

Signature RENATA S. MORANO
Name in Print RENATA S. MORANO
Relationship to the child MOTHER

Address Purok 2-B, Brgy. 1, San Francisco - Agusan del Sur
Date APRIL 2, 2007

21. PREPARED BY

Signature NYLA B. BELLADEZ
Name in Print NYLA B. BELLADEZ
Title or Position MIDWIFE
Date APRIL 2, 2007

22. RECEIVED AT THE OFFICE OF THE CIVIL REGISTRAR

Signature JOYITA T. BLUMBA
Name in Print REG. CLERK 11
Title or Position REG. CLERK 11
Date APR 03 2007

APPLICATION, LICENSE AND CERTIFICATE OF MARRIAGE

STATE OF NORTH CAROLINA
DEPARTMENT OF HEALTH AND HUMAN SERVICES - NC VITAL RECORDS

2020 APR 23 P 2:52

765

FORSYTH

LICENSE NUMBER

COUNTY

GUILFORD COUNTY, C.S.C.

MALE
APPLICANT

1. NAME FIRST JONATHAN		MIDDLE DAVID		BY LAST KUHN	
2a. RESIDENCE-STATE NORTH CAROLINA		2b. COUNTY FORSYTH		2c. CITY, TOWN, OR LOCATION WINSTON-SALEM	
2d. INSIDE CITY LIMITS (Specify Yes or No) YES		2e. STREET AND NUMBER 1430 THORNHILL LANE		3. BIRTHPLACE (COUNTY & STATE) COOK IL	
4a. DATE OF BIRTH (Month, Day, Year) 07/10/1949		4b. AGE 64		5a. FATHER-NAME ARNOLD JOSEPH KUHN	
5b. STATE OF BIRTH ILLINOIS		5c. ADDRESS (if Living) DECEASED		6a. MOTHER-MAIDEN NAME VIRGINIA MARCELLE LEBOST	
6b. STATE OF BIRTH DETROIT, MICHIGAN		6c. ADDRESS (if Living) WINSTON-SALEM NC		7. RACE (Optional) WHITE	
8. NUMBER OF THIS MARRIAGE - FIRST, SECOND, ETC. (SPECIFY) 2nd		9a. LAST MARRIAGE ENDED BY: Death, Divorce, Or Annulment (Specify) DIVORCE		9b. DATE MONTH 05 YEAR 2012	
10. EDUCATION-SPECIFY HIGHEST GRADE COMPLETED		11a. NAME FIRST ROSANNA		11b. MAIDEN SURNAME (if Different) MORANO	
ELEMENTARY 8		HIGH SCHOOL 4		COLLEGE 5	

FEMALE
APPLICANT

11a. NAME FIRST ROSANNA		MIDDLE SALAUM		LAST MORANO	
12a. RESIDENCE-STATE NORTH CAROLINA		12b. COUNTY FORSYTH		12c. CITY, TOWN, OR LOCATION WINSTON-SALEM	
12d. INSIDE CITY LIMITS (Specify Yes or No) YES		12e. STREET AND NUMBER 1430 THORNHILL LANE		13. BIRTHPLACE (COUNTY & STATE) AGUSAN DEL SUR PHILIPPIN	
14a. DATE OF BIRTH (Month, Day, Year) 12/07/1984		14b. AGE 29		15a. FATHER-NAME ROSALIO MORANO	
15b. STATE OF BIRTH PHILIPPINES		15c. ADDRESS (if Living) P2-B BRGY. 1 SAN FRANCISCO AGUSAN DEL SUR PHILIPPINES		16a. MOTHER-MAIDEN NAME RENERIA VALLEJOS	
16b. STATE OF BIRTH PHILIPPINES		16c. ADDRESS (if Living) P2-B BRGY. SAN FRANCISCO AGUSAN DEL SUR		17. RACE (Optional) FILIPINO	
18. NUMBER OF THIS MARRIAGE - FIRST, SECOND, ETC. (SPECIFY) 1st		19a. LAST MARRIAGE ENDED BY: Death, Divorce, Or Annulment (Specify)		19b. DATE MONTH YEAR	
20. EDUCATION-SPECIFY HIGHEST GRADE COMPLETED		ELEMENTARY 8		HIGH SCHOOL 4	
COLLEGE 4					

WE HEREBY MAKE APPLICATION TO THE REGISTER OF DEEDS FOR A MARRIAGE LICENSE AND SOLEMNLY SWEAR THAT ALL OF THE STATEMENTS CONTAINED IN THE ABOVE APPLICATION ARE TRUE. WE FURTHER MAKE OATH THAT THERE IS NO LEGAL IMPEDIMENT TO SUCH MARRIAGE.

SIGNATURE OF MALE APPLICANT

SIGNATURE OF FEMALE APPLICANT

To any ordained minister of any religious denomination, minister authorized by a church, federally or state recognized Indian nation or tribe, magistrate, or any other person authorized to solemnize a marriage under the laws of this State, you are hereby authorized, at any time within 60 days from the date hereof, to celebrate the proposed marriage at any place within this State. The minister or other person celebrating this marriage is required within 10 days to return this license to the Register of Deeds who issued the license. Failure to do so subjects person celebrating marriage to a forfeiture of \$200.00 to anyone who sues for the same.

SWORN TO AND SUBSCRIBED BEFORE ME THIS

05/21/2014

C. NORMAN HOLLEMAN by:

REGISTER OF DEEDS

DEPUTY/ASSISTANT

OFFICIAL

WITNESSES

21a. I CERTIFY THAT THE ABOVE NAMED PERSONS WERE MARRIED ON MONTH May DAY 22 YEAR 2014				21b. PLACE OF MARRIAGE - COUNTY Forsyth	
21c. SIGNATURE OF OFFICIAL John Cabell Fulp				21d. TITLE Reverend	
21e. NAME OF OFFICIAL (PRINT/TYPE) John Cabell Fulp				21f. ADDRESS 120 Luzelle Drive Winston-Salem, NC 27103	
22a. SIGNATURE OF WITNESS Mark C. Kasperski				23a. SIGNATURE OF WITNESS Emily Clore	
22b. NAME OF WITNESS (PRINT/TYPE) Mark C. Kasperski				23b. NAME OF WITNESS (PRINT/TYPE) Emily Clore	
22c. ADDRESS OF WITNESS 1306 Gold Finch Ln, Antioch IL 60002				23c. ADDRESS OF WITNESS 634 Irving St, Winston-Salem, NC 27103	

DATE RETURNED TO REGISTER OF DEEDS
DHHS 2132 Substitute RoD 34
VITAL RECORDS VS-80 (Revised 8/04)

MAY 27 2014

RECEIVED BY

REGISTER OF DEEDS COPY