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DEPT OF COURT RECORDS CIVIL FAMILY DIVISION ALLEGHENY COUNTY PA

#### IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

IN RE THE PETITION OF: NOAKER,

A/K/A NOAKER, A/K/A NOAKER, A/K/A NOAKER, A/K/A VON NOAKER, A/K/A PRISCYLLA RENEE VON NOAKER

FOR A NAME CHANGE TO: PRISCYLLA RENEE VON NOAKER CIVIL DIVISION

G.D. No. 21-11805

# VERIFIED PETITION FOR A NAME CHANGE

Code: \_\_\_\_\_

Filed on behalf of Petitioner

James C. Martin (PA 204336) Gregory D. Vose (PA 324912) Zachary S. Roman (PA 325730) Oluwaseyi A. Odunaiya (PA 329124) REED SMITH LLP 225 Fifth Avenue Pittsburgh, PA 15222 (412) 288-3131

Gabriel Arkles\* David Brown\* TRANSGENDER LEGAL DEFENSE & EDUCATION FUND 520 8th Ave., Ste. 2204 New York, NY 10018 (646) 993-1688 \*pro hac vice forthcoming M. Patrick Yingling (PA 311786) REED SMITH LLP 10. S. Wacker Dr., 40th Fl. Chicago, IL 60606 (312) 207-2834

#### IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

IN RE THE PETITION OF: NOAKER, A/K/A NOAKER, A/K/A NOAKER, A/K/A NOAKER, A/K/A VON NOAKER, A/K/A PRISCYLLA RENEE VON NOAKER CIVIL DIVISION

G.D. No.

FOR A NAME CHANGE TO: PRISCYLLA RENEE VON NOAKER

#### VERIFIED PETITION FOR A NAME CHANGE

AND NOW comes the Petitioner, Noaker, by Petitioner's attorneys, Reed Smith LLP and the Transgender Legal Defense and Education Fund, and upon being duly sworn, respectfully represents and shows this Court:

1. That the Petitioner is of full legal age and is a bona fide resident of the County of

Allegheny, Commonwealth of Pennsylvania. The Petitioner's residence address is

The Petitioner has been a bona fide resident of Allegheny

County, Commonwealth of Pennsylvania for 10 year(s) immediately prior to filing this Petition. The Petitioner was born on September 13, 1950, in Dauphin County, Pennsylvania, United States

of America.

- 2. The Petitioner's present name is Noaker,
- 3. The Petitioner is not married.
- 4. The Petitioner has one adult child.
- 5. The Petitioner has not resided at any other addresses over the last five (5) years.

6. The Petitioner requests this change of name because the Petitioner would like the

Petitioner's name to be consistent with the Petitioner's identity and expression.

7. The proposed change in the Petitioner's name, if granted, will not be detrimental to the interests of any other person and is not against the public interest.

8. This Petition is not filed to defraud creditors.

9. Contemporaneously with this Petition, Petitioner is also filing: (1) a Memorandum of Law in support of Name Change Petition and Unconstitutionality of the Felony Bar at 54 Pa.
C.S. § 702(c)(2); (2) the Expert Declaration of Ayden Scheim; and (3) the Curriculum Vitae of Ayden Scheim.

10. Wherefore, the Petitioner, intending to change Petitioner's name, requests that by an Order of this Court, made and entered herein, the Petitioner's name be changed to and decreed to be Priscylla Renee Von Noaker.

Dated: September 27, 2021

M. Patrick Yingling (PA 311786) mpyingling@reedsmith.com REED SMITH LLP 10 S. Wacker Dr., 40th Fl. Chicago, IL 60606 (312) 207-2834

Gabriel Arkles garkles@transgenderlegal.org David Brown dbrown@transgenderlegal.org TRANSGENDER LEGAL DEFENSE & EDUCATION FUND 520 8th Ave., Ste. 2204 New York, NY 10018 (646) 993-1688 Respectfully submitted,

/s/ Zachary S. Roman

James C. Martin (PA 204336) jcmartin@reedsmith.com Gregory D. Vose (PA 324912) gvose@reedsmith.com Zachary S. Roman (PA 325730) zroman@reedsmith.com Oluwaseyi A. Odunaiya (PA 329124) REED SMITH LLP 225 Fifth Avenue Pittsburgh, PA 15222 (412) 288-3131

Counsel for the Petitioner Noaker,

#### VERIFICATION

I, Noaker, verify that the statements made in the foregoing Verified Petition for a Name Change are true and correct to the best of my knowledge or information and belief.

I understand that this verification is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn fabrication to authorities, which provides that if I knowingly make false averments, I may be subject to criminal penalties.

Date: July 27, 2021

aker JI, Noaker

#### IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

IN RE THE PETITION OF: NOAKER, A/K/A NOAKER, A/K/A NOAKER, A/K/A PRISCYLLA RENEE VON NOAKER

CIVIL DIVISION

G.D. No.

FOR A NAME CHANGE TO: PRISCYLLA RENEE VON NOAKER

#### ORDER SCHEDULING HEARING ON NAME CHANGE

AND NOW, this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_, 20\_\_\_\_, upon hearing of the within motion of Reed Smith LLP and the Transgender Legal Defense and Education Fund, attorneys for the Petitioner above named, it is ORDERED and DECREED that the within Petition be heard on the \_\_\_\_\_\_ day of \_\_\_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_\_. The Petitioner shall obtain a judgment search from all counties in which Petitioner has resided during the last five (5) years. It is further Ordered that the Petitioner shall advertise once in the Pittsburgh Legal Journal, and once in a newspaper of general circulation in Allegheny County.

BY THE COURT,

\_\_\_\_\_, J.

#### IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

IN RE THE PETITION OF: CIV NOAKER, JR. A/K/A NOAKER, A/K/A NOAKER, G.D A/K/A PRISCYLLA RENEE VON NOAKER

CIVIL DIVISION

G.D. No.

FOR A NAME CHANGE TO: PRISCYLLA RENEE VON NOAKER

#### **DECREE FOR CHANGE OF NAME**

AND NOW, this \_\_\_\_\_\_ day of \_\_\_\_\_\_, 20\_\_\_\_, upon hearing of the within motion of Reed Smith LLP and the Transgender Legal Defense and Education Fund, attorneys for the Petitioner above named, with proof of publication and proof that there are no judgments or decrees of record or any other matter of like effect against Petitioner, and it appearing that there are no legal objections to the granting of the prayer of the Petition, it is ORDERED and DECREED that the name of the Petitioner is, from and after this date, changed to PRISCYLLA RENEE VON NOAKER.

BY THE COURT,

\_\_\_\_\_, J.

#### **CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Zachary S. Roman

#### **CERTIFICATE OF SERVICE**

On September 27, 2021 and pursuant to Pennsylvania Rule of Civil Procedure 235, I

caused a copy of the foregoing to be served via certified mail on the following:

Pennsylvania Office of Attorney General 16th Floor, Strawberry Square Harrisburg, PA 17120

/s/ Zachary S. Roman