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Patricia Plaintiff)	SUPERIOR COURT OF NEW JERSEY
)	CHANCERY DIVISION-FAMILY PART
)	MONMOUTH COUNTY
)	
Plaintiff,)	DOCKET NO. FM-13-
vs.)	
)	
Daniel Defendant)	Civil Action
)	
)	COMPLAINT FOR DIVORCE
Defendant,)	

Plaintiff, Patricia Plaintiff, residing at 123 Main Street, in the City of Freehold, County of Monmouth, and State of New Jersey, by way of Complaint against the defendant, says:

1. Plaintiff was lawfully married to defendant, Daniel Defendant, on January 1, 1986, in a religious civil in Freehold, New Jersey.
2. Plaintiff was a bona fide resident of the State of New Jersey when this cause of action arose and has ever since and for more than one year next preceding the commencement of this action continued to be such bona fide resident.
3. The defendant resides at 123 Main Street, in the City of Freehold, County of Monmouth, and State of New Jersey.
4. There are irreconcilable differences between the parties which have caused the breakdown of the marriage, and that breakdown has existed for a period of six months or more and which make it appear that the

marriage between the parties should be dissolved.

5. There is no reasonable prospect of reconciliation between the parties.

6. There was one child born of this marriage, to wit:

Name	DOB
Child 1	April 15, 1991

7. There have been no previous proceedings between the plaintiff and defendant respecting the marriage or its dissolution or respecting maintenance of the plaintiff.

8. The parties have during the marriage acquired various assets subject to equitable distribution.

WHEREFORE, Plaintiff demands judgment:

- A. Dissolving the marriage between the parties.
- B. Awarding the parties joint legal custody of the minor child and ordering that plaintiff be the parent of primary residence for the minor child.
- C. Compelling the defendant to support the plaintiff and minor child of the marriage.
- D. Equitably distributing all property both real and personal, which was legally and beneficially acquired by the parties during the marriage.
- E. Directing payment of plaintiff's counsel fees and costs.
- F. For such other and further relief as the Court may deem equitable.

Law Office of Andrew R. Fischer
Attorney for Plaintiff

By: _____
Andrew R. Fischer, Esq.

Dated:

SAMPLE

CERTIFICATION PURSUANT TO RULE 4:5-1(b)(2)

I hereby certify that to the best of my information, knowledge, and belief that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, that no other action or arbitration proceeding is contemplated, and I am not aware of any other person who should be joined in this matter.

TRIAL COUNSEL DESIGNATION PURSUANT TO RULE 4:5-1(c)

Andrew R. Fischer, is hereby designated trial counsel in this matter.

Law Office of Andrew R. Fischer
Attorney for Plaintiff

By:

Andrew R. Fischer

Dated:

VERIFICATION AND CERTIFICATION OF NON-COLLUSION

Karen Dawson of full age, states:

1. I am the plaintiff in the foregoing Complaint.

2. The allegations of the Complaint are true to the best of my knowledge, information and belief. The said Complaint is made in truth and good faith and without collusion for the causes set forth therein.

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Karen Dawson

Dated: