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PATTY PLAINTIFF,  
  
PLAINTIFF,  
  
V.

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION-FAMILY PART  
MIDDLESEX COUNTY  
CIVIL ACTION  
DOCKET NO. FM -

DANNY DEFENDANT,  
  
DEFENDANT.

**VERIFIED COMPLAINT FOR DIVORCE  
(IRRECONCILABLE DIFFERENCES)**

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The plaintiff, Patty Plaintiff, now residing at 10 Main Street, East Brunswick, in the County of Middlesex, and in the State of New Jersey, says:

**IRRECONCILABLE DIFFERENCES**

1. She was lawfully married to Danny Defendant on March 1, 2000. They were married before a municipal court judge at the East Brunswick Municipal Court in a civil ceremony.

2. She was a bona fide resident of the State of New Jersey, when this cause of action arose, and she has ever since and for more than one year next preceding the commencement of this action, continued to be such a bonafide resident.

3. The defendant is currently residing at a rooming house located in Keyport, New Jersey.

4. The defendant was a bona fide resident of the State of New Jersey, County of Middlesex, at the time the instant cause of action arose, and she has ever since and for more than one year

preceding the commencement of this action continued to be such a bona fide resident.

5. There was one child born of the marriage.

6. There have been no prior proceedings between the parties in the nature of Domestic Violence.

7. Property, real and/or personal, was legally and beneficially acquired by the parties, or either of them, during the marriage.

8. Irreconcilable differences having arisen between the parties of a period of six (6) months thereby causing the breakdown of the parties' marriage such that there is no reasonable prospect of reconciliation between the parties and the marriage should be dissolved.

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

**WHEREFORE,** the plaintiff demands judgment;

A. Dissolving the marriage between the parties;

B. Awarding joint legal custody of the child with the plaintiff, with the plaintiff being designated as the primary caretaker;

C. For a determination of defendant's child support obligations for the children of the marriage;

D. Establishing a reasonable and liberal time sharing schedule for the defendant;

E. Equitably distributing all property, both real and personal, which was legally and beneficially acquired by the parties during the marriage;

F. For counsel fees and costs;

G. For such other relief which the court may deem equitable and just.

THEODORE SLIWINSKI, ESQ.  
ATTORNEY FOR PLAINTIFF

CERTIFICATION OF VERIFICATION AND NON-COLLUSION

1. I am the plaintiff in the foregoing complaint to which this is annexed.

2. The allegations of the complaint are true to the best of my knowledge and belief. The complaint is made in truth and in 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 wilfully false, then I am subject to punishment.

PATTY PLAINTIFF

DATE: