

Theodore Sliwinski, Esq.
45 River Road
East Brunswick, NJ 08816
Attorney for Plaintiff
(732) 257-0708

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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
(DESERTION)**

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The plaintiff, Patty Plaintiff, now residing at 123 Maple Ave., in the Township of Down in the Dumps, County of Middlesex, and in the State of New Jersey, says:

DESERTION

1. She was lawfully married to Danny Defendant, on January 1, 1990, in a religious ceremony, in South River, New Jersey.

2. She was a bonafide resident of the State of New Jersey, when this 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.

3. The defendant is currently residing at 123 Broad Street, Fun City, New Jersey.

4. The defendant deserted the plaintiff on or about December 1, 2004. The defendant has ever since such time and for more than twelve months has willfully and continuously deserted the plaintiff.

5. There were two children born of the marriage and their names are David Defendant, DOB 2/15/1990, and Mary Defendant, DOB 3/15/1994.

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

WHEREFORE, plaintiff demands judgment;

A. Dissolving the marriage between the parties;

B. Awarding sole legal custody of the children 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. For a determination of the defendant's alimony obligation to the plaintiff.

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

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

G. For counsel fees and costs;

H. For such other relief which the court may deem equitable

and just.

THEODORE SLIWINSKI, ESQ.
ATTORNEY FOR PLAINTIFF

DATE:

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: