

Theodore Sliwinski, Esq.
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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
(ADULTERY)**

_____X

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:

ADULTERY

1. The plaintiff Patty Plaintiff presently resides at 123 Maple Ave., Down in the Dumps, N.J.

2. The defendant Danny Defendant now presently resides at 123 Broad Street, Fun City, New Jersey.

3. The venue is proper in Middlesex County in as much as plaintiff was domiciled therein at the time the within cause of action arose.

4. Plaintiff was a bonafide resident of the State of New Jersey at the time the instant cause of action arose and he has ever since and for more than one (1) year next preceding the commencement of this action continued to be such a bona fide resident.

5. The parties were married on January 1, 1990.

6. There were two children born of the marriage: to wit, David Defendant, DOB 1/1/1990, and Mary Defendant, DOB 2/1/1993. All of the children are presently not emancipated.

7. Real and personal property was legally and beneficially acquired by the parties during the marriage and is subject to equitable distribution.

8. During the parties' marriage, the defendant has committed adultery with one Suzy Slut, at numerous times and places, including, without limitation, on or about the following dates and at the following location[s]:

DATE

LOCATION

March 26, 2004

The Love Motel, Route 9, Howell, NJ

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

10. There have been no prior proceedings between the parties with respect to the marriage, its dissolution or with respect to the maintenance and support of either party, or the children of the marriage.

WHEREFORE, plaintiff demands judgment;

A. Dissolving the marriage between the parties;

B. Awarding sole legal custody of the children with the plaintiff;

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 supervised visitation 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:

