

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

_____X

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
(EXTREME CRUELTY)**

_____X

The plaintiff, Patty Plaintiff, now residing at Down in the Dumps, in the Municipality of East Brunswick, in the County of Middlesex, and in the State of New Jersey, says:

EXTREME CRUELTY

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 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 123 Main Street, Fun City, N.J.

4. The defendant has been guilty of extreme cruelty toward the plaintiff during the marriage. A complete summary of the defendant's acts of extreme cruelty are herein attached in Exhibit "A."

5. The above named acts of extreme cruelty have endangered the safety or health of the plaintiff or made it improper or unreasonable to expect the plaintiff to continue to cohabit with the defendant.

6. More than three months have elapsed since the last act of extreme cruelty complained of as constituting the cause of action herein. The acts of extreme cruelty committed by the defendant with a period of three months before the filing of this complaint, as above set forth, are alleged not as constituting in whole or in part the cause of action set forth herein, but as relating back to qualify and characterize the acts constituting said cause of action.

7. There were two children born of the marriage, and their names are David Defendant and Mary Defendant.

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

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

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

WHEREFORE, plaintiff demands judgment;

(A) Dissolving the marriage between the parties;

(B) Awarding joint 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) 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

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:

SCHEDULE A

1. During the marriage, the defendant very rarely exhibited any warmth or affection toward me or to our children. The defendant barely ever spoke to me or to our children. The defendant always informed me that he did not want to continue to live in the marital home.

2. There was no warmth and caring in our relationship. Instead the relationship was more akin to a brother to sister relationship, instead of a husband to wife relationship. Obviously, the breakdown of the relationship occurred because the defendant simply ignored me and his children.

3. The plaintiff and the defendant have grown physically and emotionally apart since the time of their marriage, and they no longer share the same interests.

4. The defendant refuses to share in basic activities with the plaintiff, which has caused the plaintiff to feel unfulfilled and depressed about the state of her marriage.

