

Wendy Armour, Esq.  
Armour Law Firm  
407 Main Street, Suite 204  
Metuchen, NJ 08840  
732-243-9733  
Attorney for Plaintiff  
Attorney ID#022972006

*Plaintiff*

**PLAINTIFF**

*vs.*

*Defendant*

**DEFENDANT**

***SUPERIOR COURT OF NEW  
JERSEY  
CHANCERY DIVISION  
FAMILY PART***

\_\_\_\_\_ ***COUNTY***

***Docket No. FM-***

***CIVIL ACTION***

**COMPLAINT FOR DIVORCE**

Plaintiff, (Plaintiff's name), residing at (Plaintiff's address), (Plaintiff's County), State of New Jersey, by way of complaint against the Defendant says:

1. Plaintiff was lawfully married to Defendant, (Defendant's name), on (date of marriage), in a (civil or religious) ceremony in (location of marriage).
2. Plaintiff was a bona fide resident of the State of New Jersey and the (Plaintiff's county of residence when the cause of action arose) when the 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 a bona fide resident.
3. The present residence of the Defendant is (Defendant's address), (Defendant's County), State of New Jersey.
4. The parties have suffered irreconcilable differences which have caused the breakdown of the marriage for a period longer than six months and which make it appear that the

marriage should be dissolved and that there is no reasonable prospect of reconciliation which comply with and set forth in N.J.S.A. 2A:34-2(1)(i), and continuing until the present.

5. By reasons of the aforesaid irreconcilable differences, it is improper and unreasonable to expect the Plaintiff to continue to cohabit with the Defendant.
6. More than six months have elapsed since Plaintiff's cause of action has arisen. Any such irreconcilable differences between the parties within a period of six months before the filing of the within Complaint, are alleged and not as constituting in whole or in part the Plaintiff's cause of action, but as relating back to qualify and characterize the irreconcilable differences constituting this cause of action.
7. At the time when the aforesaid irreconcilable differences constituting Plaintiff's cause of action for divorce arose, the parties resided at (address of Plaintiff and Defendant when the cause of action arose), State of New Jersey.
8. There was (number of children) child born of the marriage aforesaid, namely (child's name), born on (child's date of birth).
9. The parties, during the course of their marriage, acquired property, both real and personal, which is subject to equitable distribution.
10. There has been no prior court proceeding between the parties.

**WHEREFORE**, Plaintiff demands judgment:

- A. Dissolving the marriage between the parties; and
- B. Granting the Parties joint legal custody of the minor child born of the marriage;  
and
- C. Designating the Plaintiff as the Parent of Primary Residential and the Defendant

as the Parent of Alternate Residence.

D. Equitably distributing property, both real and personal, acquired by the parties during the course of the marriage; and

E. Equitably allocating the marital debt; and

F. Awarding Plaintiff spousal support; and

G. Permitting Plaintiff to resume her maiden name of: (Plaintiff's maiden name); and

H. For such further relief as the Court may deem just and equitable.

**DESIGNATION OF TRIAL COUNSEL**

Please take notice that pursuant to the provisions of *R.4:25-4*, Wendy Armour is designated as trial counsel for Plaintiff in the within-captioned matter.

DATED: \_\_\_\_\_, 2016.

\_\_\_\_\_  
Wendy Armour, Esq.

**CERTIFICATIONS OF ATTORNEY PURSUANT TO R. 4:5-1 AND R. 5:4-2(h)**

1. I am the attorney for the plaintiff in the above-captioned matter, and I make this certification pursuant to *R. 4:4-2(h)* and *R. 4:5-1*.

2. Pursuant to *R. 4:5-1*, the matter in controversy is not the subject of any other action pending in any Court, nor the subject of a pending arbitration proceeding. Also, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, no other party shall be joined in the within action, and, in the event that there is a change in the facts stated herein, each party has a continuing obligation to file and serve upon all other parties and the court an amended certification.

3. Pursuant to *R. 5:4-2(h)*, I have provided my client with a copy of the document “Divorce - Dispute Resolution Alternatives to Conventional Litigation.” Moreover, I have discussed with my client the complementary dispute resolution alternatives to litigation contained in that document.

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.

DATED: \_\_\_\_\_, 2016.

\_\_\_\_\_  
Wendy Armour, Esq.

**CERTIFICATION OF LITIGANT OF VERIFICATION AND  
NONCOLLUSION AND PURSUANT TO R. 5:4-2(h) AND R. 4:5-1**

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

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

3. Pursuant to *R. 4:5-1*, the matter in controversy in the within action is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any such Court action or arbitration proceeding presently contemplated. There are no other persons who should be joined in this action at this time.

4. Pursuant to *R. 5:4-2(h)*, I have read the document entitled "Divorce - Dispute Resolution Alternatives to Conventional Litigation." I thus have been informed as to the availability of complementary dispute resolution alternatives to litigation.

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.

DATED: \_\_\_\_\_, 2016.

\_\_\_\_\_  
Plaintiff

Wendy Armour, Esq.  
Armour Law Firm  
407 Main Street, Suite 204  
Metuchen, NJ 08840  
732-243-9733  
Attorney(s) for Plaintiff  
Attorney ID#022972006

*Plaintiff*

**PLAINTIFF**

vs.

*Defendant*

**DEFENDANT**

***SUPERIOR COURT OF NEW  
JERSEY  
CHANCERY DIVISION  
FAMILY PART***

\_\_\_\_\_ ***COUNTY***

***Docket No. FM-***

***CIVIL ACTION***

**ACKNOWLEDGEMENT OF  
SERVICE**

To: (Defendant's name)  
(Defendant's address)

The undersigned, (Defendant's name), Defendant, hereby acknowledges service of two copies of the following documents:

1. Summons and Complaint for Divorce with Certification of Verification and Non-Collusion,
2. Certification of Attorney and Client,
3. Certification of Insurance Coverage,

with regards to the above-captioned matter, this \_\_\_\_\_ day of \_\_\_\_\_ 2016.

\_\_\_\_\_  
Defendant