

Commonwealth of Massachusetts

The Trial Court

Division _____

Probate and Family Court Department

Docket No. _____

COMPLAINT FOR SEPARATE SUPPORT

1. John Doe, Plaintiff v. Jane Doe, Defendant
 Plaintiff, who resides at 200 City Street, Anycity MA 00000 is the
 (Street address) (City/Town) (State) (Zip)
 spouse of the defendant, who resides at 100 Othercity Street, Other city MA 11111
 (Street address) (City/Town) (State) (Zip)
 2. The parties were married at Anycity, MA on July 5, 2006
 (Date)
 and last lived together at 200 Anycity, MA on January 31, 2016
 (Date)
 3. The minor or dependent child(ren) of this marriage is/are: (Date)

Steven Doe, born October 4, 2007 (name of child and date of birth)
 Sarah Doe, born November 13, 2009 (name of child and date of birth)

4. Plaintiff alleges:
 Defendant is not providing suitable support, without justifiable cause.
 He/she has been deserted by the defendant.
 He/she is actually living apart from defendant for justifiable cause. Please explain:
 On January 31, 2106 the defendant left our home and took the children to live with her mother indefinitely.
 He/she has justifiable cause for living apart. Please explain:

5. Wherefore, plaintiff requests that the Court:
 establish that such living apart from the defendant is for justifiable cause.
 prohibit defendant from imposing any restraint on plaintiff's personal liberty.
 grant plaintiff defendant custody of the above-named child(ren).
 order a suitable amount for support of plaintiff and/or above-named child(ren) with suitable provision for health insurance.
 order conveyance of the real estate located at _____
 standing in the name of _____
 as recorded with the _____ Registry of Deeds, Book _____ Page _____
 order shared legal and physical custody of the minor children.

Date February 1, 2016

John Doe
 (Signature of attorney or plaintiff, if pro se)
 John Doe
 (Print name)
 200 City Street
 (Street address)
 Anycity MA 00000
 (City/Town) (State) (Zip)

Tel. No. (123) 456-7890

B.B.O. # _____ C.G.F