

Commonwealth of Massachusetts

The Trial Court

Division Berkshire

Probate and Family Court Department

Docket No. \_\_\_\_\_

COMPLAINT FOR DIVORCE

Mary Smith, Plaintiff v. Joseph Smith, Defendant

1. Plaintiff, who resides at 123 Twentieth St., Pittsfield, Berkshire

MA 00000 was lawfully married to the defendant who now resides at 456 Thirtieth St. Pittsfield, Berkshire MA 00000

2. The parties were married at Lenox on June 6, 1995

and last lived together at 123 Twentieth St., Pittsfield, Berkshire County, MA on or about May 20, 2002

3. The minor or dependent child(ren) of this marriage is/are: Susan Smith, December 20, 2001; Alicia Smith, June 5, 1999; Joseph Smith, Jr., October 2, 2000

4. Plaintiff certifies that no previous action for divorce, annulment or affirmation of marriage, separate support, desertion, living apart for justifiable cause, or custody of child(ren) has been brought by either party against the other except: Complaint for Separate Support. Mary Smith v. Joseph Smith, Berkshire Probate and Family Court, Docket No. XXXXXX

5. On or about May 20, 2002 the defendant at Pittsfield, Massachusetts, was cruel and abusive to the plaintiff. He has been cruel and abusive to the plaintiff on numerous other dates and occasions.

6. Wherefore, plaintiff requests that the Court: [X] grant a divorce for cruel and abusive treatment; [X] grant plaintiff custody of the above-named child(ren); [X] prohibit defendant from imposing any restraint on plaintiff's personal liberty; [X] 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 \_\_\_\_\_

[X] allow plaintiff to resume former name of Mary Jones

Date \_\_\_\_\_

(Signature of attorney or plaintiff, if pro se)

Mary Smith (Print name)

123 Twentieth St. (Street address)

Pittsfield MA 00000 (City/Town) (State) (Zip)

Tel. No. +1 (413) 123-4567

B.B.O. # \_\_\_\_\_ C. G. F