

[REDACTED], ESQS.
[REDACTED] Avenue
[REDACTED]

Attorneys for Plaintiff [REDACTED] Collins

SUPERIOR COURT OF [REDACTED]
CHANCERY DIVISION
[REDACTED] COUNTY
FAMILY PART

Docket Number:

[REDACTED] COLLINS, :
Plaintiff, : Civil Action
v. : COMPLAINT FOR DIVORCE
ELIOT W. COLLINS, :
Defendant. :

Plaintiff, [REDACTED] COLLINS, residing at [REDACTED] Lane,
in the Borough of [REDACTED], County of [REDACTED] and State of [REDACTED]
[REDACTED], by way of Complaint says:

1. Plaintiff and defendant were lawfully married in a
civil ceremony on [REDACTED] in [REDACTED].
One child was born of the marriage, [REDACTED], born
[REDACTED].

2. Defendant resides at [REDACTED] Lane, [REDACTED], [REDACTED]
[REDACTED] and resided in [REDACTED] when the cause of action arose.

3. Defendant has been guilty of extreme cruelty toward

plaintiff commencing on or about the month of [REDACTED] and continuing until [REDACTED]. Particularly specifying the acts of extreme cruelty committed by defendant, plaintiff says that:

(a) Despite plaintiff's constant protest, defendant has consistently and persistently engaged in bizarre eating habits and malodorous methods of cooking which make it extremely uncomfortable for plaintiff to remain in the marital residence during defendant's meals and frequently require plaintiff to vacate the premises during those times. Defendant has persisted with this practice even though plaintiff's distress is evident and plaintiff has asked defendant to stop. This course of conduct by defendant has caused severe psychological trauma to plaintiff.

(b) Defendant persistently has bragged about his health and fitness in the face of knowledge that he is healthier and fitter than defendant and his assertions of physical prowess make her feel inferior and inadequate. Defendant has persisted with this practice even though plaintiff's distress is evident and plaintiff has asked defendant to stop. This course of conduct by defendant has caused severe psychological trauma to plaintiff.

(c) Defendant throughout this period has obsessively devoted virtually all his free time to running, leaving woefully

inadequate time for family activities. Defendant has persisted with this practice even though plaintiff's distress is evident and plaintiff has asked defendant to spend less time running and more time with the family. This course of conduct by defendant has caused severe psychological trauma to plaintiff.

4. By reason of these acts of extreme cruelty, plaintiff's health has become endangered, and it is improper and unreasonable to expect plaintiff to continue to cohabit with defendant.

5. More than three months have elapsed since the last act of extreme cruelty complained of as constituting plaintiff's cause of action.

6. Plaintiff was a bona fide resident of the State of [REDACTED] when this 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.


7. There have been no previous proceedings between the plaintiff and the defendant respecting maintenance of the plaintiff in any court.

WHEREFORE, plaintiff demands judgment:

- (a) Dissolving the marriage between the parties.
- (b) Awarding her sole physical custody and joint legal custody of the minor child born of the marriage.
- (c) Compelling defendant to support said minor child.

(d) Equitably distributing all property, both real and personal, owned or acquired by the parties during the course of the marriage.


(e) For such further relief as the Court may deem equitable and just.



Attorney for Plaintiff

Dated: 

CERTIFICATION

 of full age, certifies as follows:

1. I am the attorney for the plaintiff herein. To the best of my knowledge, the matter in controversy is not the subject matter of any other action pending in any court or of any pending arbitration proceeding. To the best of my knowledge and belief, there are no other parties who must be joined in this action.

2. 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:  

CERTIFICATION OR VERIFICATION AND NON-COLLUSION

I am the plaintiff in the foregoing Complaint. The allegations of the Complaint are true and to the best of my knowledge, information and belief. The Complaint is made in true good faith and without collusion for the causes set forth therein.

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.



Collins

Dated: 