

ROMANOWSKI LAW OFFICES
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Attorney for Plaintiff

Plaintiff

Rhonda P. Webber

vs.

Defendant

Ronald Webber

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
FAMILY PART

MIDDLESEX COUNTY

Docket No.: FM-12-0000-00-Z

CIVIL ACTION

**VERIFIED COMPLAINT FOR CUSTODY &
CHILD SUPPORT**

The Plaintiff, Rhonda P. Webber, residing at 22 Happenstance Drive, in the Borough of Dissolution, County of Middlesex, State of New Jersey says:

Plaintiff, Rhonda P. Webber, residing at 22 Happenstance Drive, Dissolution, New Jersey, by way of Complaint, says:

1. She was lawfully married to Ronald Webber, the Defendant herein, on February 14, 1985, and said marriage still subsists.
2. Plaintiff resides at 22 Happenstance Drive, Dissolution, New Jersey, and is a *bona fide* resident of the State of New Jersey.
3. (Alternate Paragraph 2, if Plaintiff currently resides out of State): Defendant resides at 44 Predicament Place, Estrangement, NJ 08837, and is a *bona fide* resident of the State of New Jersey.

4. The Defendant, Ronald Webber, separated himself from the Plaintiff on or about **(Date of separation)**, and has resided ever since at 44 Predicament Place, Estrangement, New Jersey.

5. Two minor children were born of the marriage, namely, Stephanie Webber, born February 17, 1989, age 16 and Michael Webber, born September 22, 1996, age eight, both of whom are presently in the custody of the Plaintiff.

6. Defendant, Ronald Webber, is unfit to be entrusted with the care, custody, education and maintenance of the said infant children, and the happiness and welfare of said children requires that the Plaintiff be given their care, custody, education and maintenance by the judgment of this Court for the following reasons:

- a.
- b.
- c.

7. No person who is not a party to these proceedings has physical custody of the children or claims to have custody or visitation rights.

8. It would be in the best interests of the children for plaintiff to have custody awarded to her, because:

- a.
- b.
- c.

9. For the foregoing reasons and for such facts as may be adduced through discovery and at trial, the Plaintiff requests that custody of the infant children of the marriage remain with her, with supervised parenting time to the Defendant, if requested, and on conditions as the Court may direct in the best interests of the children.

10. There have been no previous matrimonial proceedings between the parties.

WHEREFORE, Plaintiff demands judgment:

- (A) Awarding to Plaintiff sole legal and physical custody of the unemancipated children of the marriage;
- (B) Awarding to Plaintiff support for herself and for the minor children of the marriage;
- (C) Barring Defendant from removing the children from the State of New Jersey without the prior approval of the Court;
- (D) For counsel fees and costs;
- (E) For such further relief as the Court may deem just and equitable.

ROMANOWSKI LAW OFFICES
Attorney for Plaintiff

By: _____
CURTIS J. ROMANOWSKI, Esq.

DATED: March 7, 2005