

ROMANOWSKI LAW OFFICES
475 Main Street – 2nd Floor
Metuchen, NJ 08840
(732) 603-8585
Attorney for Plaintiff

Plaintiff

Ronald Webber

vs.

Defendant

Rhonda P. McGinty, falsely known as
Rhonda P. Webber

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
FAMILY PART

MIDDLESEX COUNTY

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

CIVIL ACTION

VERIFIED COMPLAINT FOR ANNULMENT

The Plaintiff, Ronald Webber, residing at 44 Predicament Place, in the Town of Estrangement, County of Middlesex and State of New Jersey says:

1. A form of ceremony of marriage took place between the Plaintiff and the Defendant on February 14, 2004 in a civil ceremony in Dissolution, New Jersey.
2. He was a bona fide resident of the State of New Jersey at the time of the commencement of the action.
3. The Defendant, Rhonda P. McGinty, falsely known as Rhonda P. Webber, now resides at 22 Happenstance Drive, in the Borough of Dissolution, County of Middlesex, State of New Jersey.

4. Following the form of ceremony of marriage, on **(Date of child's birth)**, the Defendant gave birth to a fully matured child, born after the full period of gestation. This child was begotten by some person unknown to the Plaintiff. At the time of the birth of the child, the Plaintiff had been married to the Defendant for a period of only **(Number of months)** months.

5. Prior to his marriage to the Defendant, the Plaintiff had known her for a period of **(Number of months)** months. During that time, the Plaintiff did not have any sexual intercourse with the Defendant.

6. Plaintiff would not have entered into the purported marriage contract with the Defendant, had he been informed that the Defendant was pregnant. It was the Defendant's duty to inform the Plaintiff that she was pregnant. Defendant wholly neglected to do so, with the intent to defraud and mislead the Plaintiff, thereby fraudulently inducing him to marry her.

7. Plaintiff separated himself from Defendant on **(Date of separation)**, as soon as he learned of her fraud, and has not since had sexual intercourse with her.

8. On February 14, 2004, the day the within cause of action arose, Plaintiff was domiciled at 66 Liberty Street, in the Borough of Dissolution, County of Middlesex, State of New Jersey.

9. There have been no previous matrimonial actions between the parties.

WHEREFORE, Plaintiff demands judgment as follows:

- (A) Declaring and adjudging the purported marriage between the parties to be null and void;
- (B) For counsel fees and costs;
- (C) 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

ROMANOWSKI LAW OFFICES

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March 7, 2005 (10:01 am)
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