

VERIFIED COMPLAINT FOR DIVORCE

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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 DIVORCE

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

**DRUG ADDICTION**

1. She was lawfully married to Ronald Webber on February 14, 1985 in a civil ceremony in Dissolution, New Jersey.
2. She was a *bona fide* resident of the State of New Jersey 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 *bona fide* resident.

On October 30, 2003, the time the within cause of action arose, the Plaintiff was domiciled at 22 Happenstance Drive, in the Borough of Dissolution, County of Middlesex, State of New Jersey.

3. The Defendant, Ronald Webber, now resides at 44 Predicament Place, in the Town of Estrangement, County of Middlesex and State of New Jersey.

4. The Defendant has been under the voluntarily induced addiction (or habituation) to heroin, a drug, for a period of 12 or more consecutive months, commencing on or about the 31<sup>st</sup> day of December, 2001 and continuing from that day until the present.

5. Two children were born of the marriage; namely: Stephanie Webber, born February 17, 1989, age 14 and Michael Webber, born September 22, 1996, age seven, all of whom are presently in the joint legal custody of the parties, with the Plaintiff acting as the primary caretaker.

6. There have been no prior proceedings between the parties in the nature of Domestic Violence.

7. The Plaintiff has no adequate means of support for herself and the two children born of the marriage, or to pay her counsel fees and costs.

8. Property, real and/or personal, was legally and beneficially acquired by the parties, or either of them, during the marriage.

9. There have been no previous proceedings between the Plaintiff and Defendant respecting the marriage or its dissolution or respecting the maintenance of the Plaintiff and the two children born of the marriage.

10. It is in the best interests of the children that joint legal custody be thereof be awarded, with primary residential custody awarded to the Plaintiff.

**WHEREFORE,** Plaintiff demands judgment on this count:

- (A) Dissolving the marriage between the parties;
- (B) Awarding joint legal custody, with primary residential custody of the unemancipated children of the marriage awarded to Plaintiff ;
- (C) Awarding the Defendant reasonable rights of parenting time with the infant children of the marriage;
- (D) Compelling the Defendant to support the Plaintiff and the two children were born of the marriage;
- (E) Equitably distributing all property, both real and personal, which was legally and beneficially acquired by the parties or by either of them during the marriage;
- (F) Directing the Defendant to continue the Plaintiff as beneficiary on all life insurance policies on the Defendant's life;
- (G) For counsel fees and costs;
- (H) Permitting the Plaintiff to resume her birth name of Rhonda P. McGinty;
- (I) For such further relief as the Court may deem just and equitable.

**ROMANOWSKI LAW OFFICES**  
**Attorney for Plaintiff**

By: \_\_\_\_\_

**CURTIS J. ROMANOWSKI, ESQ.**

DATED: December 06, 2003