

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 SEPARATE
MAINTENANCE**

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

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.
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 Parties lived together following their marriage until February 14, 2005, at which time the parties separated from each other by mutual consent. Since that date, the Defendant has consistently refused and neglected to maintain and to adequately and suitably provide for the Plaintiff and for the two minor children born of the marriage, and continues to this date to refuse and neglect to maintain and to adequately and suitably provide for the Plaintiff and for the two minor children born of the marriage. By reason of the premises, the Defendant, within the true meaning of the statute in such case made and provided, did on the said 14th day of February 2005, abandon the Plaintiff, and has ever since abandoned her.

5. At the time of the Defendant's failure to support the Plaintiff, she resided at 22 Happenstance Drive, in the Borough of Dissolution, County of Middlesex, State of New Jersey. Plaintiff was a resident at that address at the time this cause of action for separate maintenance arose.

6. Two (2) children were born of the marriage; namely: Stephanie Webber, born February 17, 1989, age 16; and Michael Webber, born September 22, 1996, age eight, all of whom are presently in the sole residential custody of the Plaintiff.

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

8. The Plaintiff has no adequate means of support for herself and the two (2) children born of the marriage, or to pay her counsel fees and costs. Plaintiff is currently 41 years of age. She has

been a stay at home mother and homemaker for the duration of her marriage. She is currently unemployed and has been unemployed for the last 20 years, having devoted all of her married life to caring for the children and maintaining the home.

9. The Defendant is currently 50 years of age. He is a medical doctor and earns \$180,000 per year. He has significant assets, which include, but are not limited to stocks, bonds and savings. The Plaintiff does not have knowledge of the exact nature and amount of these assets.

10. The Defendant has neglected and refused, and continues to neglect and refuse to maintain and provide for the Plaintiff and for the two minor children of the marriage in a manner suitable to their position and station in life, contrary to the statute in such case made and provided, although the Defendant is amply able to do so. The Defendant has been paying only \$100 per week to the Plaintiff; and amount totally insufficient for the needs of the Plaintiff and for the two minor children.

WHEREFORE, Plaintiff demands judgment:

- (A) Awarding to Plaintiff sole legal and physical custody of the unemancipated children of the marriage;
- (B) That the Defendant be ordered to provide such suitable support and maintenance from his income, or be made out of his property, as the court shall fix and determine, for the Plaintiff and the two children;

- (C) That the Defendant be ordered to furnish reasonable security for the payment thereof, from time to time, under the orders of this court;
- (D) That if the Defendant cannot be found in this State, so as to be served with process, his estate, property, and effects in this State be sequestered or attached, in order to compel his appearance and performance of such orders as shall be made herein;
- (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) For counsel fees and costs;
- (G) 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