

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

**NOTICE OF MOTION FOR
PENDENTE LITE RELIEF**

PLEASE TAKE NOTICE that the undersigned attorney for the Plaintiff, Rhonda P. Webber, shall make the following application to this Court at the date, time and place indicated:

COURT: Superior Court of New Jersey
Chancery Division - Family Part
MIDDLESEX COUNTY

BEFORE: Honorable Justin T. Solomon, J.S.C.
Family Court
120 New Street
New Brunswick, NJ 08903-0964

DATE: (Return Date)

TIME: 9:00 a.m. or as soon thereafter as counsel may be heard.

APPLICATION: For an Order:

1. Granting the relief as more specifically set forth in the attached form of proposed Order.
2. For such further relief as the Court may deem equitable and just.

GROUND(S):

On this application, reliance shall be made upon the pleadings and matters of record, and the annexed Certification(s) and Exhibits.

ORAL ARGUMENT:

Pursuant to R. 1:6-2 (d) the undersigned:

() waives oral argument and consents to disposition on the papers.

() does not request oral argument at this time unless opposition hereto is filed or the Court is inclined to deny this application.

(x) requests oral argument.

FORM OF ORDER:

Annexed hereto is a form of Order pursuant to R. 1:6-2.

ROMANOWSKI LAW OFFICES
Attorney for Plaintiff

By: _____

CURTIS J. ROMANOWSKI, Esq.

DATED: March 05, 2005

NOTICE TO LITIGANTS

IF YOU WANT TO RESPOND TO THIS MOTION YOU MUST DO SO IN WRITING. This written response shall be by affidavit or certification. (Affidavits and certifications are documents filed with the court. In either document the person signing it swears to its truth and acknowledges that they are aware that they can be punished for not filing a true statement with the court. Affidavits are notarized and certifications are not.) If you would also like to submit your own separate requests in a motion to the judge you can do so by filing a cross-motion. Your response and/or crossmotion may ask for oral argument. That means you can ask to appear before the court to explain your position. However, you must submit a written response even if you request oral argument. Any papers you send to the court must be sent to the opposing side, either to the attorney if the opposing party is represented by one, or to the other party if they represent themselves.

The response and/or cross-motion must be submitted to the court by a certain date. All pre-divorce motions, all enforcement motions (also known as motions for enforcement of litigants' rights, R. 1.10-3), or motions that deal with the status of children must be filed 16 days before the return date. (Since most motion days are on a Friday, motion papers must be filed on the Wednesday 16 days before.) Therefore, a response and/or cross motion must be filed 8 days (Thursday) before the return date. All post-judgement motions including all motions for modification of alimony, child support, custody or visitation must be filed 29 days (Thursday) before the (Friday) return date. Therefore, a response and/or cross-motion must be filed 15 days (Thursday) before the return date. If you mail in your papers you must add three days to the above time periods.

Response to motion papers sent to the court are to be sent to the following address: Family Court, 120 New Street, P.O. Box 2691, New Brunswick, NJ 08901, Attention: Matrimonial Intake. Call the Family Division Manager's office (732-981-3001) if you have any questions on how to file a motion, cross-motion or any response papers. Please note that the Family Division Manager's office cannot give you legal advice.

**NOTICE PURSUANT TO
N.J.S.A. 2A:17-56.8.**

The child support provision of the order sought in this application shall be enforced by an income withholding upon the current or future income due from the defendant's employer or successor employers, and upon the unemployment compensation benefits due the defendant and against debts, income, trust funds, profits or other income from any other source due the defendant, except that pursuant to N.J.S.A. 2A:17-56.9, an immediate withholding shall not apply where the parties agree in writing to an alternate arrangement, or the plaintiff or defendant demonstrate and the Court finds, good cause for establishing an alternate arrangement.

The amount of child support set forth in any order resulting from the application and administered under Part IV-D of the Social Security Act (42 U.S.C. 651-669) shall be reviewed and updated, as necessary, at least every three (3) years.