

**ROMANOWSKI LAW OFFICES**  
**475 Main Street – 2<sup>nd</sup> Floor**  
**Metuchen, NJ 08840**  
**(732) 603-8585**

*Attorney for Plaintiff*

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*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 LIMITED  
DIVORCE PURSUANT TO N.J.S.A. 2A:34-3**

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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 have lived separate and apart in different habitations for a period of eighteen or more consecutive months, commencing on or about January 1, 2000, and continuing until the present time, and there is no reasonable prospect of reconciliation. Plaintiff.

5. Two (2) 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 sole residential custody of the Plaintiff.

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 (2) 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 (2) children born of the marriage.

10. It is in the best interests of the children that sole legal and physical custody thereof be awarded to Plaintiff.

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

- (A) Granting a divorce from bed and board pursuant to N.J.S.A. 2A:34-3;
- (B) Awarding to Plaintiff sole legal and physical custody of the unemancipated children of the marriage;
- (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 (2) children 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: March 05, 2005