

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

Attorney for Petitioners

In the Matter of:

THE ADOPTION OF A CHILD BY
Rhonda and Ronald Webber, husband and wife.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
FAMILY PART

MIDDLESEX COUNTY

Docket No.:

CIVIL ACTION

VERIFIED COMPLAINT FOR ADOPTION

The Petitioners, Rhonda Webber and Ronald Webber, husband and wife, say:

1. Petitioner, [**adoptive father**] Ronald Webber, is 50 years old. Petitioner, [**adoptive mother**] Rhonda P. Webber, is 41 years old. Petitioners are husband and wife, residing together at 111 Happy Time Place in Contentedness, New Jersey. Both Petitioners are citizens of the United States and are not related to the child to be adopted.
2. The name of the child to be adopted is Michael McGinty. The child was born on September 22, 2004 in Edison, New Jersey.
3. Petitioners received the child to be adopted on or about September 24, 2005 at 111 Happy Time Place in Contentedness, New Jersey, as explained in the Affidavit of Circumstances Surrounding

Placement of Child submitted herewith, and the child has been under the continuous care of the Petitioners from that date until the filing of this Complaint.

4. The name of the birth mother is Claire McGinty.

5. The name of the birth father is Fernando de Soto McGinty.

6. The said child to be adopted has no property.

7. The name by which the child to be adopted shall be known is Michael Webber.

8. The Petitioner, Ms. Rhonda P. Webber, is employed by Ronald W. Webber, M.D., 695 Metatarsal Plaza, Phalange Pike, New Jersey as a gynecologist. The Petitioner, Ronald Webber, is employed by Ronald W. Webber, M.D., 695 Metatarsal Plaza, Phalange Pike, New Jersey as a obstetrician. The Petitioners are well able to support the child to be adopted.

9. The Petitioners have one other child, to wit: Stephanie Webber, born February 17, 1989, age 16.

10. The Affidavit of Circumstances Surrounding Placement of Child is attached hereto as [**Exhibit "A"**].

11. The Consent of Birth Mother is attached hereto [**Exhibit "B"**].

12. The Affidavit of Birth Mother is also attached [**Exhibit "C"**].

13. The Birth Mother's Affidavit Regarding Waiver of Right to Counselling is attached [**Exhibit "D"**].

14. The Birth Mother's Notice Regarding Reimbursement of Expenses is attached [**Exhibit "E"**].

15. The Consent of Birth Father is attached [**Exhibit "F"**].

16. The Affidavit of Birth Father is attached [**Exhibit "G"**].

17. The Birth Father's Affidavit Regarding Waiver of Right to Counselling is attached [**Exhibit "H"**].

18. The Birth Father's Notice Regarding Reimbursement of Expenses is attached [**Exhibit "I"**].

19. The Affidavit of Birth Father Acknowledging Paternity is attached hereto as [**Exhibit "J"**].

WHEREFORE, Petitioners demand judgment of this Court granting the adoption of the child by the Petitioners.

ROMANOWSKI LAW OFFICES
Attorney for Petitioners

By: _____

CURTIS J. ROMANOWSKI, ESQ.

DATED: October 10, 2004

CERTIFICATION

Rhonda Webber and Ronald Webber, husband and wife, Petitioners in the annexed Complaint, being duly sworn upon their oath according to the law, depose and say:

do hereby certify that:

1. The contents of the annexed Complaint are true to the best of our knowledge, information and belief.

DATED: _____
Rhonda Webber
Petitioner

DATED: _____
Ronald Webber
Petitioner

AFFIDAVIT OF VERIFICATION AND NONCOLLUSION

STATE OF _____)
)
COUNTY OF _____) ss.:

Rhonda Webber and Ronald Webber, husband and wife, Petitioners
in the annexed Complaint, being duly sworn upon their oath
according to the law, depose and say:

do hereby certify that:

- 1. The contents of the annexed Complaint are true to the best of
our knowledge, information and belief.

DATED: _____
Rhonda Webber
Petitioner

DATED: _____
Ronald Webber
Petitioner

Sworn to and subscribed before me this
___ day of _____, 20__.

A Notary Public of New Jersey
State of New Jersey

the child for adoption. She also stated the she wanted to choose the family for her child.

4. Over the course of the next several months, my husband and I spoke with the birth mother nearly once a week. Our conversations were pleasant and the birth mother reaffirmed her desire to pursue an adoption plan.

5. On or about August 3, 2004, my husband and I traveled to Edison, New Jersey, in order to meet the birth mother prior to her due date. Our meeting with the birth mother went well and was a very positive experience.

6. On September 22, 2004, the birth mother gave birth to a baby boy. We stayed with the birth mother and the child at the hospital until they were released from the hospital on September 24, 2004.

7. We took our baby boy home to New Jersey on September 24.

8. **(If intermediary) We have paid no money to Felicia Friend for making the introductions for us. No one else served in any intermediary capacity.**

9. The foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Rhonda P. Webber

Sworn to and subscribed before me this

___ day of _____, 20__.

A Notary Public of New Jersey
State of New Jersey

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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
FAMILY PART

MIDDLESEX COUNTY

Docket No.

CIVIL ACTION

NOTICE TO BIRTH FATHER

TO: Fernando de Soto McGinty
44 Dissolution Circle
Heartbreak Hills, New Jersey
Birth Father of Michael McGinty

SIR:

PLEASE TAKE NOTICE that a hearing will take place in the above-entitled matter, wherein the Petitioners, Rhonda and Ronald Webber are seeking the adoption of Michael McGinty, born on September 22, 2004, and wherein it has been determined that you are the Birth Father of the child to be adopted, at the date, time and place indicated:

COURT: Superior Court of New Jersey
Chancery Division - Family Part
Middlesex County

BEFORE: Honorable Justin T. Solomon, A.J.S.C.
Middlesex County Court House
Chambers 205
One Kennedy Square
New Brunswick, NJ 08903-0964

DATE: (Return Date)

TIME: 1:30 p.m. in the afternoon or as soon thereafter as counsel may be heard.

TAKE FURTHER NOTICE that you have a right to appear at that hearing and object to the proposed adoption; and

TAKE FURTHER NOTICE that at the hearing, the Petitioners, Rhonda and Ronald Webber will seek to terminate any parental rights you may have with respect to Michael McGinty; and

TAKE FURTHER NOTICE that you have a right to be represented by an attorney at said hearing.

ROMANOWSKI LAW OFFICES
Attorney for Plaintiff

By: _____
CURTIS J. ROMANOWSKI, ESQ.

DATED: November 10, 2005

The undersigned hereby certifies that the within Notice was served as permitted by the rules. I further certify that a copy of the within Notice has been filed with the Middlesex County Surrogate's Office, and that a copy of the within Notice was served upon any counsel of record.

CURTIS J. ROMANOWSKI, ESQ.

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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
FAMILY PART

MIDDLESEX COUNTY

Docket No.

CIVIL ACTION

NOTICE TO BIRTH MOTHER

TO: Claire McGinty
44 Dissolution Circle
Heartbreak Hills, New Jersey
Birth Mother of Michael McGinty

MADAM:

PLEASE TAKE NOTICE that a hearing will take place in the above-entitled matter, wherein the Petitioners, Rhonda and Ronald Webber are seeking the adoption of Michael McGinty, born on September 22, 2005, and wherein it has been determined that you are the Birth Mother of the child to be adopted, at the date, time and place indicated:

COURT: Superior Court of New Jersey
Chancery Division - Family Part
Middlesex County

BEFORE: Honorable Justin T. Solomon, A.J.S.C.
Middlesex County Court House
Chambers 205
One Kennedy Square
New Brunswick, NJ 08903-0964

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TAKE FURTHER NOTICE that at the hearing, the Petitioners, Rhonda and Ronald Webber will seek to terminate any parental rights you may have with respect to Michael McGinty; and

TAKE FURTHER NOTICE that you have a right to be represented by an attorney at said hearing.

ROMANOWSKI LAW OFFICES
Attorney for Plaintiff

By: _____
CURTIS J. ROMANOWSKI, ESQ.

DATED: November 10, 2005

The undersigned hereby certifies that the within Notice was served as permitted by the rules. I further certify that a copy of the within Notice has been filed with the Middlesex County Surrogate's Office, and that a copy of the within Notice was served upon any counsel of record.

CURTIS J. ROMANOWSKI, ESQ.