

SAMPLE COMPLAINT IN DIVORCE

Plaintiff, _____, by and through his/ her counsel, Law Offices of Craig B. Bluestein, P.C., by _____ Esquire, respectfully submits this Complaint in Divorce and, in support thereof, avers as follows:

COUNT I
GROUND

1. The Plaintiff is _____, who resides at _____.

2. The Defendant is _____, who resides at _____.

3. The parties were married on _____ at _____, County of _____, Pennsylvania.

4. The parties were separated on _____.

5. The Plaintiff **IS** or **IS NOT** a citizen of the United States (circle one).

6. The Defendant **IS** or **IS NOT** a citizen of the United States (circle one).

7. The Plaintiff has resided within the Commonwealth of Pennsylvania for _____ years.

8. The Defendant has resided within the Commonwealth of Pennsylvania for _____ years.

9. A true and correct copy of the marriage certificate is attached hereto as "Exhibit A".

10. The grounds for divorce on which this action is based are as follows:

(THIS SECTION TO BE DISCUSSED WITH ATTORNEY)

WHEREFORE, Plaintiff prays that this Honorable Court divorce the Plaintiff and Defendant from the bonds of matrimony and

**Please note that additional “counts” (sections) may be added based upon your personal situation. These additional sections could include alimony, child support, child custody, equitable distribution (property division), special relief, exclusive possession of the marital home, and other areas of law.