

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF _____

_____ JUDICIAL DISTRICT

_____,)
)
 Plaintiff,)
)
 vs.)
)
 _____,)
)
 Defendant.)

Civil No: _____

COMPLAINT
(Short Form)

COMES NOW, the plaintiff and for (his) (her) cause of action, alleges and shows to the Court as follows:

I.

The plaintiff is now or for more than six (6) months prior to the projected Entry of Judgment will have been a resident of the State of North Dakota.

II.

The plaintiff and defendant were married on _____ at _____, _____, and ever since have been and now are husband and wife.

III.

That the parties have ____ (__) child(ren) born of the marriage: _____, born _____, and _____, born _____. Since the separation, the child(ren) (has) (have) resided with _____. _____ is not now pregnant.

IV.

In the best interest of the minor child(ren) the plaintiff should have the parenting responsibility and decision making of the minor child(ren) of the parties. The defendant

is an able-bodied person and is well able to contribute toward the support of said minor child(ren).

V.

That this Court has jurisdiction to determine parenting responsibility and decision making of the minor child(ren) pursuant to N.D.C.C. § 14-14.01, et seq., as set forth in the Affidavit filed herein.

VI.

For some time prior to the commencement of this action, irreconcilable differences have arisen between the plaintiff and defendant. That this has destroyed the legitimate objects of the marriage and made it impossible for the plaintiff and defendant to live together as husband and wife.

VII.

The parties are owners of property, which should be divided by the Court and an equitable portion thereof, awarded to each party.

VIII.

The parties have accumulated a certain amount of debt throughout the marriage, which should be divided, and an equitable portion thereof assessed to each party.

IX.

The plaintiff is entitled to spousal support and the defendant has the ability to pay spousal support. The plaintiff has and will incur expenses of attorney fees in prosecuting these proceedings, as well as costs of suit. The defendant should contribute towards the payment of such expenses.

X.

The plaintiff wishes to have her name restored to _____.

XI.

[OPTIONAL paragraph - to be used when action has to be published or you anticipate Defendant will not answer.]

That the purpose of this action is for a divorce and for the purpose of divesting defendant's interest in the following described property:

(LIST PROPERTY)

WHEREFORE, plaintiff prays for Judgment as follows:

1. The bonds of matrimony presently existing between the plaintiff and defendant be wholly dissolved and that the plaintiff be granted an absolute decree of divorce from the defendant.
2. The plaintiff be awarded the parenting responsibility and decision making of the minor child(ren) of the parties subject to reasonable parenting time by the defendant.
3. The defendant be required to pay to the plaintiff a reasonable sum as and for the support of (himself) (herself) and the minor child(ren).
4. For an equitable division of the property.
5. For an equitable distribution of the accumulated debts of the parties.
6. For attorney fees and costs in prosecuting this action.
7. The plaintiff's name restored to _____.
8. For such other and further relief as may be equitable and just.

[OPTIONAL paragraphs - to be used when action has

to be published or you anticipate defendant will not answer.]

9. For the divesting of defendant's interest in the following described property:

(PROPERTY LISTING)

10. For a fair and equitable division of the property owned by the parties and the indebtedness incurred by the parties, to-wit:

**(SPECIFY WHAT PROPERTY EACH IS TO GET
AND WHICH DEBTS EACH IS TO GET)**

Dated this _____ day of _____, _____.

By _____
Name of Attorney
Address
Telephone:
ND License No. _____
ATTORNEYS FOR _____

(OPTIONAL)

VERIFICATION

STATE OF NORTH DAKOTA)
) ss.
COUNTY OF _____)

_____, being first duly sworn on oath, deposes and says that (he) (she) is the plaintiff in the above-entitled action; that (he) (she) has read the within Complaint and knows the contents thereof and that the same is true, except as to matters stated therein upon information and belief and as to those matters (he) (she) states that (he) (she) believes them to be true.

Plaintiff

STATE OF NORTH DAKOTA)
) ss
COUNTY OF _____)

On this ___ day of _____, _____, before me, a Notary Public, in and for said county and state, personally appeared _____, known to me to be the person who is described in and who executed the within instrument and acknowledged to me that (he) (she) executed the same.

Notary Public

(SEAL)