

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF _____

_____ JUDICIAL DISTRICT

In the Interests of _____,)
a minor child, by her natural guardian,)
_____; State of North Dakota,)
by and through the _____ County)
Social Service Board; and _____,)

Civil No. _____

Plaintiffs,)

**COMPLAINT TO ESTABLISH
PATERNITY OF MINOR CHILD**

vs.)

_____,)

Defendant.)

The plaintiff, _____, of _____, North Dakota, by her attorney, _____, for her cause of action, alleges as follows:

1. Plaintiff, _____, the natural mother of the minor plaintiff, _____, is duly qualified to act as guardian for her minor child.

2. The minor plaintiff, _____, was conceived within the state of North Dakota and was born on xx/xx/____, in _____, North Dakota.

3. The defendant, _____, and the natural mother of the minor child engaged in sexual intercourse in North Dakota during the possible period of conception of the minor child.

4. The defendant, _____, has a legal duty of support of the minor child.

5. The defendant, _____, and the natural mother of the minor plaintiff, _____, have never been married to one another and are not now married to one another, and to protect the interests of the minor plaintiff, it is necessary to establish and have declared a parent-child relationship to exist between the defendant, _____, and the minor plaintiff, _____.

6. The minor plaintiff, _____, is presently residing with (his) (her) natural mother, _____, at _____, North Dakota, and has so resided with (his) (her) mother ever since (his) (her) birth.

7. The above Court has jurisdiction of the parties to and the subject matter of this action pursuant to N.D.C.C. § 14-20-04.

8. This action is brought pursuant to Chapter 14-20 of the North Dakota Century Code.

9. The natural mother of the minor plaintiff is in need of financial assistance to adequately support herself and the minor plaintiff.

10. The plaintiff, _____, is presently not receiving any public assistance monies on behalf of the minor child.

11. At all times herein mentioned, defendant, _____, has had the financial ability to pay a reasonable sum each month for the support of the minor plaintiff, _____, to provide reasonable health insurance coverage for the minor plaintiff and to pay reasonable attorney fees and costs of this suit herein.

12. With regard to any existing court order for the support of the minor plaintiff, _____: none are known to exist.

WHEREFORE, the plaintiff, _____, prays for judgment as follows:

1. For the defendant, _____, to be declared to be the natural father of _____, the minor child plaintiff.
2. For this matter to proceed pursuant to N.D.C.C. § 14-20.
3. For the defendant, _____, to be ordered to pay a reasonable sum per month as and for child support for the support of the minor plaintiff, and to pay expenses incurred to date for the care of the minor plaintiff.
4. For the judgment to provide that the child support order shall be in compliance with N.D.C.C. § 14-09-09.24, et seq.
5. For plaintiff, _____, to be granted parenting responsibility of the minor child subject to the reasonable parenting time of defendant.
6. For the judgment to provide that any child support and all other payments ordered in the judgment be made by the defendant be paid to the State Disbursement Unit, P.O. Box 7280, Bismarck, North Dakota 58507-7280.
7. For either the plaintiff or defendant to be ordered to provide reasonable health insurance coverage for the minor child.
8. For the defendant to be ordered to pay reasonable attorney fees and costs incurred by the plaintiffs.
9. For the parties to be required to notify the Clerk of District Court, above-named, in writing within ten (10) days of any change of employment circumstance or address.
10. For such other and further relief as the Court may deem just and equitable.

Dated this _____ day of _____, _____.

By _____
Name of Attorney

Address

Telephone

ND License No. _____

ATTORNEYS FOR _____