

**IN THE SUPERIOR COURT OF BIBB COUNTY  
STATE OF GEORGIA**

JANE DOE,  
Plaintiff,

and

Civil Action File No.: \_\_\_\_\_

JOHN DOE,  
Defendant.

**COMPLAINT FOR DIVORCE AND OTHER RELIEF**

COMES NOW, the Plaintiff, JANE DOE, Pro Se, and files her Complaint for Divorce and Other Relief against the Defendant, and shows to this Honorable Court the following:

1.

That the Plaintiff has been a resident of the State of Georgia for a period exceeding six (6) months prior to filing his Complaint for Divorce and Other Relief action.

2.

The Defendant is a resident of Bibb County and is subject to the jurisdiction of this Court.

3.

The Defendant may be served by the Sheriff's Department at the Defendant's residence address, which is as follows: 13█ Lake Valley Road, Macon, Georgia 31210.

4.

That the Plaintiff and Defendant were lawfully married on April 20, 2007, and lived together as husband and wife until July 20, 2015, at which time the parties separated and have since continuously lived in a bona fide state of separation with no opportunity for reconciliation.

5.

Plaintiff brings this action for divorce on the grounds that that the marriage is irretrievably broken, as defined in O.C.G.A. § 19-5-3(13), as amended; and on all such other grounds that could be averred by amendment as provided pursuant to O.C.G.A. § 19-5-3, *et seq.*

6.

That there are four minor children of this marriage, to wit: John Doe, a male whose date of birth is February 2, 2009; James Doe, a male whose date of birth is March 29, 2010; Jane Doe, a female whose date of birth is January 9, 2013; and Jean Doe, a male whose date of birth is June 20, 2014. No other children are expected from this marriage.

7.

That the minor children currently live with the parties at 13█ Lake Valley Road, Macon, GA 31210. The children have lived at this address since approximately 2010.

8.

That during the last five years, the children has lived at the following address: with parents at 13█ Lake Valley Road, Macon, GA 31210 from 2010 to present.

9.

That Plaintiff has not participated as a party, or witness, or in any capacity in any other litigation concerning the custody of the minor children in this or any other state.

10.

That the Plaintiff does not have any information of any proceeding that could affect this case, including proceedings for enforcement and proceedings related to family violence, protective orders, termination of parental rights, and adoptions in this or any other state.

11.

That the Plaintiff knows of no other person, not a party to this proceeding, who has

physical custody of the children or claims to have custody or visitation rights with respect to the minor children.

12.

That the Plaintiff believes that the following custody arrangement is in the best interests of the children: The Plaintiff should have sole physical and legal custody.

13.

That the Plaintiff believes that the following visitation arrangement is in the best interests of the children: The Defendant shall have the children on the days that he has off from work during the week; he can pick them up from school at 3:15 p.m. and return them at 7:00 p.m. If Defendant is off from work on back to back days, the children can spend the night with him and Plaintiff will pick the children up the following day if Father is working. Defendant can also have the children every other weekend that he is off from work from Friday at 9:30 p.m. until Sunday at 6:00 p.m.

14.

Based on Defendant's monthly gross income of \$2,633.75 per month, and the Georgia Child Support Guidelines (O.C.G.A. § 19-6-15), Plaintiff can pay the Defendant an amount of child support of \$1,023.00 per month.

15.

That the Plaintiff should be ordered to maintain a policy for medical, dental and hospitalization insurance for the minor children.

16.

The parties should be equally responsible for all expenses incurred for the children's medical, dental and hospital care that are not covered by insurance.

17.

The Plaintiff should be allowed to claim the minor children John Doe and James Doe as dependents for tax purpose; and the Defendant should be allowed to claim the minor children Jane Doe and Jean Doe as dependents for tax purposes.

18.

That the Plaintiff is not requesting alimony.

19.

That the Plaintiff and Defendant have obtained the following property during our marriage, and Plaintiff is asking for a fair division of this property: 13█ Lake Valley Road, Macon, GA 31210; 2007 Chrysler Town & Country; 1998 Ford Escort; and a Vanguard 401K. Plaintiff would like to be awarded all right, title and interest in the 2007 Chrysler Town & Country, sole use and possession of 13█ Lake Valley Road, Macon, GA 31210; and one-half of the Vanguard 401K. The parties have already agreed on the division of the household contents, including clothes, furniture, appliances, and electronics.

20.

That the Plaintiff and Defendant have outstanding joint or marital debts, and the responsibility for paying them should be as follows: The Plaintiff should be ordered to pay for the BMO Harris Bank auto loan balance in the amount of \$8,800.00; Robin's Federal Credit Union credit card balance in the amount of \$3,246.27; and the Capital City Bank mortgage balance in the amount of \$72,502.00; hold Defendant harmless thereon.

21.

The Plaintiff would like her maiden name of Jane Smith restored to her.

22.

That the Plaintiff desires a total divorce from the Defendant upon legal principles.

WHEREFORE, Plaintiff prays as follows:

- (a) That Plaintiff be granted a total divorce, that is, a divorce *a vincula matrimonii*, upon legal principles;
- (d) That the permanent custody and visitation for the children be ordered according to Paragraphs 12 and 13;
- (c) That child support, health insurance and medical expenses for the support of the minor children be ordered according to Paragraphs 14,15 and 16;
- (d) That the parties be allowed to claim the children as tax dependents according to Paragraph 17;
- (e) That the marital property be divided according to Paragraph 19;
- (f) That the joint and marital debts be divided according to Paragraph 20;
- (g) That a Rule Nisi be scheduled by the Court to decide on the relief I have Requested;
- (h) That the Plaintiff's maiden name be restored according to Paragraph 21;
- (i) That the Court order any and all other relief that the Court finds appropriate.

Signed this the \_\_\_\_ day of \_\_\_\_\_, 2015.

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JANE DOE  
Plaintiff, Pro Se  
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