

**SAMPLE - DO NOT USE  
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**Commonwealth of Massachusetts  
The Trial Court**

Hampshire Division

Probate and Family Court Department

Docket No. \_\_\_\_\_

**Complaint For Divorce**

**SAMPLE**  
John M. Jones \_\_\_\_\_, Plaintiff  
v.  
Sarah K. Jones \_\_\_\_\_, Defendant

1. Plaintiff, who resides at 440 Northwest Ave., Northampton, Hampshire County, MA 01060  
(Street and No.) (City or Town) (County) (state) (zip)

was lawfully married to the defendant who now resides at 77 Thomas Street  
(Street and No.)

Northampton Hampshire MA 01060  
(City or Town) (County) (State) (ZIP)

2. The parties were married at Hadley, MA on 6-16-84  
and last lived together at 77 Thomas St., Northampton, MA on 1-1-00

3. The minor child ren of this marriage, and date(s) of birth is/are:

John Jones, Jr. (d.o.b. 4-3-87)  
James Jones (d.o.b. 10-30-91)  
**SAMPLE**

4. Plaintiff certifies that no previous action for divorce, annulling or affirming marriage, separate support, desertion, living apart for justifiable cause, or custody of child \_\_\_\_\_ has been brought by either party against the other except:

5. On or about January 1, 2000, ~~the date~~ an irretrievable  
breakdown of the marriage under Massachusetts General Laws Ch. 208 s. 1B occurred  
and continues to exist.

6. Wherefore, plaintiff requests that the Court:

- grant a divorce for irretrievable breakdown of the marriage
- prohibit defendant from imposing any restraint on plaintiff's personal liberty
- grant him/her custody of the above-named child \_\_\_\_\_
- order a suitable amount for support of the plaintiff and said minor child \_\_\_\_\_
- order conveyance of the real estate located at \_\_\_\_\_  
\_\_\_\_\_ standing in the name of \_\_\_\_\_  
\_\_\_\_\_ as recorded with \_\_\_\_\_  
Registry of Deeds, Book \_\_\_\_\_ Page \_\_\_\_\_
- allow plaintiff to resume her former name of \_\_\_\_\_
- \_\_\_\_\_

Date January 23, 2001

John M. Jones

Signature of Attorney or Plaintiff, if pro se

Print name and address John M. Jones  
440 Northwest Avenue, Northampton, MA 01060

Tel. No. (413) 587-0000 B.B.O. # \_\_\_\_\_

**SAMPLE**