
, : In the Court of Common Pleas

Plaintiff : County, Pennsylvania

v. : Docket No.: _____

:

, : Civil Action - In Law

Defendant : In Divorce

COMPLAINT IN DIVORCE
NO FAULT DIVORCE
PURSUANT TO §3301 (C) OR (D) OF THE DIVORCE CODE

AND NOW, comes _____, and in support of this Complaint in Divorce respectfully avers as follows:

1. Plaintiff is _____, an adult individual currently residing in _____ County, Pennsylvania.
2. Defendant is _____, an adult individual currently residing in _____ County, Pennsylvania.
3. Plaintiff and Defendant have been bona fide residents of the Commonwealth of Pennsylvania for at least six months immediately prior to the filing of this Complaint.
4. Plaintiff and Defendant were married on _____ in _____.
5. Both parties are citizens of the United States of America.
6. Plaintiff is not an active member of the United States military or its allies. Further, Plaintiff avers that Defendant is not an active member of the United States military or its allies.
7. There have been no prior actions of divorce or for annulment between the parties hereto in this or any other jurisdiction.
8. Plaintiff has been advised that counseling is available and that Plaintiff or Defendant has the right to request that the court require the parties to participate in counseling.

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9. Plaintiff is proceeding for divorce from the Defendant on the following grounds
- a. Section 3301(c), as the marriage is irretrievably broken and after ninety (90) days have elapsed from the date of service of this Complaint, Plaintiff shall file an affidavit consenting to a divorce. Plaintiff believes that Defendant may also file such an affidavit; or
 - b. Section 3301(d), as the marriage is irretrievably broken, the parties live separate and apart, and, when the requisite period of time has passed, Plaintiff shall submit an affidavit alleging that the parties have lived separate and apart for at least one (1) year if the date of separation is on or after December 5, 2016 or for at least two (2) years if the date of separation is before December 5, 2016.

WHEREFORE, Plaintiff humbly requests the Honorable Court to enter a Decree of Divorce from the bonds of matrimony existing between Plaintiff and Defendant

Respectfully submitted,

Dated:

Printed Name

Signature

Address

City, State, Zip Code