

Hampden Division

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court Department

Docket No. 03-DO

Complaint for Contempt

M. S., Plaintiff

J. J., Defendant

1) Plaintiff, who resides at 112 O Street, MA
was the spouse of defendant, who now resides at 40 H Drive
MA

2) By judgment ~~order~~ of the Court, dated March 3, 2002, defendant was ordered:
 to pay alimony - support of minor children - sum of \$25.00
forthwith and the further sum of \$25.00 weekly - monthly - thereafter
 to grant ~~plaintiff~~ visitation rights with every Saturday from 12 Noon to 5pm. Defendant
was ordered not to use alcohol and to go to AA weekly.
 not to impose any restraint on the personal liberty of plaintiff
 to pay reasonable medical and dental expenses

and said judgment ~~order~~ is still in force.

3) Defendant has not obeyed that judgment ~~order~~ and
 is in arrears of court-ordered support payments
 there now remains due and unpaid to plaintiff the sum of _____
plus such further amounts as may accrue to the date of hearing
 plaintiff has been denied visitation rights on _____

has violated the order on March 10, 2002
by drinking with the children in the car,
He was arrested for DWI / DUI

4) Wherefore, plaintiff requests that defendant be required to appear before this Court to show cause why said defendant should not be adjudged in contempt of Court and for such other relief as to said Court may seem just.

Date _____

Name M. S.
Address 112 O Street
MA
Phone None

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT
PROBATE & FAMILY COURT DEPARTMENT

BERKSHIRE, SS.

DOCKET No. 03W0000

<u>Joe Jones,</u>)	
Plaintiff)	
v.)	(SAMPLE)
)	ANSWER TO COMPLAINT
Jane Smith,)	FOR CIVIL CONTEMPT
Defendant)	

1. Defendant lacks knowledge as to Plaintiff's address.
Denied that Plaintiff and Defendant were or are spouses.
Defendant's address is impounded.
2. Admitted.
3. Denied that the Plaintiff was denied visitation rights the week of July 4, 2003.
Denied that Defendant violated the order on August 5, 2003.
Admitted that around September 14, 2003 Defendant was contacted by the Plaintiff's father for a visit. Denied that the Defendant denied Plaintiff visitation that day.

Defendant further states that:

There was no visit scheduled during any of the times the Plaintiff claims she violated the court order. Furthermore, the Plaintiff has skipped two scheduled visits at the visitation center, on August 8, 2003 and September 18, 2003.

WHEREFORE Defendant asks the Court to find that her actions were not contemptuous, and requests that Plaintiff's complaint for contempt be dismissed.

Date: _____

Respectfully submitted,

Jane Smith

CERTIFICATE OF SERVICE

A copy of this Answer has this day been served upon the Plaintiff by mailing a copy postage prepaid via certified U.S. Mail to him at the address listed on his complaint: 444 Any Street, Pittsfield, MA 01201. Sworn to under the pains and penalties and perjury.

Date: _____

Jane Smith