

Commonwealth of Massachusetts

The Trial Court

Division Berkshire

Probate and Family Court Department

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

COMPLAINT FOR SEPARATE SUPPORT

1. Mary Smith, Plaintiff v. Joseph Smith, Defendant  
Plaintiff, who resides at 123 First St. Pittsfield MA 01201 is the  
(Street address) (City/Town) (State) (Zip)

spouse of the defendant, who resides at 456 Third St. Pittsfield MA 01201  
(Street address) (City/Town) (State) (Zip)

2. The parties were married at Lenox on June 6, 1995  
(Date)  
and last lived together at Pittsfield, Berkshire County, MA on May 20, 2002  
(Date)

3. The minor or dependent child(ren) of this marriage is/are:  
Susan Smith December 20, 2001 Alicia Smith June 5, 1999  
(name of child and date of birth) (name of child and date of birth)

Joseph Smith, Jr. October 2, 2000  
(name of child and date of birth)

4. Plaintiff alleges:  
 Defendant is not providing suitable support, without justifiable cause.  
 He/she has been deserted by the defendant.  
 He/she is actually living apart from defendant for justifiable cause. Please explain:  
He has been cruel and abusive to me on numerous occasions.  
 He/she has justifiable cause for living apart. Please explain:  
\_\_\_\_\_

5. Wherefore, plaintiff requests that the Court:  
 establish that such living apart from the defendant is for justifiable cause.  
 prohibit defendant from imposing any restraint on plaintiff's personal liberty.  
 grant  plaintiff  defendant custody of the above-named child(ren).  
 order a suitable amount for support of  plaintiff and/or  above-named child(ren) with suitable provision for health insurance.  
 order conveyance of the real estate located at \_\_\_\_\_  
standing in the name of \_\_\_\_\_  
as recorded with the \_\_\_\_\_ Registry of Deeds, Book \_\_\_\_\_ Page \_\_\_\_\_.

Date \_\_\_\_\_

\_\_\_\_\_  
(Signature of attorney or plaintiff, if pro se)  
Mary Smith  
(Print name)  
123 First St.  
(Street address)  
Pittsfield MA 01201  
(City/Town) (State) (Zip)

Tel. No. 413 123 4567

B.B.O. # \_\_\_\_\_ C.G.F