

Commonwealth of Massachusetts

The Trial Court

Division Plymouth

Probate and Family Court Department

Docket No. PC16503470R

COMPLAINT FOR DIVORCE PURSUANT TO G.L. c. 208 § 1B

Marlande-LA Gueere Plaintiff

v.

AROLD Jean-Jacques Defendant

1. Plaintiff who resides at 60 Reservoir St Brockton (City/Town) (County)
MA 02301 (State) (Zip) was lawfully married to the defendant who now resides at 5438 Henri Bourassa (Street Address)
Montreal Nord (City/Town) (County) QC H1K 2S9 (State) (Zip)

2. The parties were married at Montreal on 11-26-1997 (Date)
 and last lived together at 5438 Henri Bourassa on 9-10-1999 (Date)

3. The minor or dependent child(ren) of this marriage is/are:

N/A (name of child and date of birth)
N/A (name of child and date of birth)

N/A (name of child and date of birth)
N/A (name of child and date of birth)

4. Plaintiff certifies that no previous action for divorce, annulment or affirmation of marriage, separate support, desertion, living apart for justifiable cause, or custody of child(ren) has been brought by either party against the other except:

N/A

5. On or about 9-10-1999 (Date) an irretrievable breakdown of the marriage under G.L. c. 208 § 1B occurred and continues to exist.

6. Wherefore, plaintiff requests that the Court:

☒ grant a divorce on the ground of irretrievable breakdown.

☐ grant ☐ plaintiff ☐ defendant custody of the above-named child(ren).

☐ prohibit defendant from imposing any restraint on plaintiff's personal liberty.

☐ 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

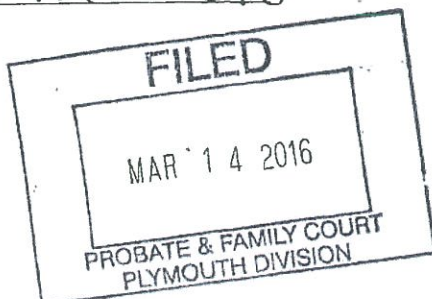
_____ as recorded with the _____

Registry of Deeds, Book _____ Page _____

☐ allow plaintiff to resume former name of _____

☐ _____

Date 3-14-2016



(Signature of attorney or plaintiff, if pro se)

Marlande LaGueere (Print name)

60 Reservoir St (Street address)

Brockton MA 02301 (City/Town) (State) (Zip)

Tel. No. 774-826-5671

B.B.O. # _____ C.G.F.

**DIVORCE SUMMONS BY
PUBLICATION AND MAILING**

Docket No.
PL16D0347DR

**Commonwealth of Massachusetts
The Trial Court
Probate and Family Court**

Mirlande Laguerre

vs.

Arold Jean-Jacques

To the Defendant:

Plymouth Probate and Family Court
52 Obery Street
Suite 1130
Plymouth, MA02360

The Plaintiff has filed a Complaint for Divorce requesting that the Court

grant a divorce for IRRETRIEVABLE BREAKDOWN

The Complaint is on file at the Court.

An Automatic Restraining Order has been entered in this matter preventing you from taking any action which would negatively impact the current financial status of either party. **SEE Supplemental Probate Court Rule 411.**

You are hereby summoned and required to serve upon:

Mirlande Laguerre
60 Reservoir Street
Brockton, MA 02301

your answer, if any, on or before **10/17/2016**. If you fail to do so, the court will proceed to the hearing and adjudication of this action. You are also required to file a copy of your answer, if any, in the office of the Register of this Court.

WITNESS, Hon. Edward G Boyle, First Justice of this Court.

Date: August 19, 2016



Register of Probate