

IN THE COURT OF COMMON PLEAS OF LEHIGH COUNTY, PENNSYLVANIA  
CIVIL DIVISION

:

:

Plaintiff :

vs.

: File No.

:

:

IN DIVORCE

Defendant :

COMPLAINT IN DIVORCE  
UNDER SECTION 3301(c)(1) OR 3301 (d) OF THE DIVORCE CODE

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_  
comes the Plaintiff \_\_\_\_\_, who files this Complaint in  
Divorce a statement of which is as follows:

1. The Plaintiff, \_\_\_\_\_, is an adult individual residing at  
(Name)

\_\_\_\_\_  
Address City State\zip County

2. The Defendant, \_\_\_\_\_, is an adult individual residing at  
(Name)

\_\_\_\_\_  
Address City State\zip County

3.

Pennsylvania for at least six (6) months immediately prior to the filing of this Complaint.

4. Plaintiff and Defendant were married on \_\_\_\_\_ in  
(date)

\_\_\_\_\_  
(city/state or country)

5. There have been no prior actions for divorce or for annulment of the marriage between the parties in this or any other jurisdiction. Except \_\_\_\_\_

6. Plaintiff avers that the Defendant is not a member of the armed services of the United States and so the protections afforded under the Service members Civil Relief Act are not applicable.

7. Plaintiff has been advised of the availability of marriage counseling and that Plaintiff may have the right to request that the Court require the parties to participate in counseling. Plaintiff hereby waives whatever rights he/she may have to request marriage counseling.

8. Plaintiff avers that the marriage is irretrievably broken.

WHEREFORE, Plaintiff requests this Honorable Court to enter a Decree in Divorce upon the following grounds:

A. Plaintiff avers that the marriage between the parties is irretrievably broken and believes that the Defendant will consent to the entry of a divorce decree under 23 Pa.C.S.A. §3301(c)(1), after at least ninety (90) days have passed from the date of service of the within Complaint.

B. Plaintiff avers that the marriage between the parties is irretrievably broken within the meaning of 23 Pa.C.S.A. §3301(d) of the Divorce Code, and the parties will have lived separate and apart for a period of at least two (2) years with the date of separation commencing prior to December 5, 2016, or one (1) year with the date of separation commencing on or after December 5, 2016 at the time of hearing of this matter and/or at the time that the Plaintiff will file an Affidavit under 23 Pa.C.S.A. §3301(d) of the Divorce Code.

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Fax: \_\_\_\_\_

### **VERIFICATION**

I verify that the statements made in this Pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Date: \_\_\_\_\_  
\_\_\_\_\_ Plaintiff

Plaintiff  
vs. File No.  
IN DIVORCE  
Defendant

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CLERK OF JUDICIAL RECORDS, CIVIL DIVISION  
LEHIGH COUNTY COURTHOUSE  
FIRST FLOOR, ROOM 122  
455 W HAMILTON STREET  
ALLENTOWN, PENNSYLVANIA 18101-1614

IF YOU DO NOT FILE A CLAIM FOR ALIMONY, DIVISION OF PROPERTY, LAWYER'S FEES OR EXPENSES BEFORE A DIVORCE OR ANNULMENT IS GRANTED, YOU MAY LOSE THE RIGHT TO CLAIM ANY OF THEM.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LEHIGH COUNTY BAR ASSOCIATION  
LAWYER REFERRAL SERVICE  
1114 W WALNUT ST ALLENTOWN PA 18102  
PHONE: 610-433-7094

### **AMERICANS WITH DISABILITIES ACT OF 1990**

The Court of Common Pleas of Lehigh County is required by law to comply with the Americans with Disabilities Act of 1990. For information about accessible facilities and reasonable accommodations available to disabled individuals having business before the Court, please contact the Court Administrator's Office at (610) 782-3014. All arrangement must be made a least 72 hours prior to any hearing or business before the Court. You must attend the scheduled conference or hearing