

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 there **are no children** of the parties under the age of eighteen (18).

Plaintiff avers that there **is\are child(ren)** of the parties under the age of eighteen (18).

Name

Birth date

9. 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), 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 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.

Name: _____

Address: _____

Phone: _____

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