

IN THE CHANCERY COURT OF RANKIN COUNTY, MISSISSIPPI

**IN THE MATTER OF THE DISSOLUTION
OF THE MARRIAGE OF JANE DOE
AND JOHN DOE**

CIVIL ACTION NO. _____

JOINT COMPLAINT FOR DIVORCE - IRRECONCILABLE DIFFERENCES

1. Jane Doe ("Jane") is an adult resident citizen of Rankin County, Mississippi, having a residence address of 123 Deer Lane, Pearl, Mississippi 39208.

2. John Doe ("John") is an adult resident citizen of Rankin County, Mississippi, having a residence address of 123 Deer Lane, Pearl, Mississippi 39208.

3. Jane and John were married on August 23, 1990, in Rankin County, Mississippi.

4. The parties have been actual bonafide resident citizens within this State for six (6) months next preceding the filing of this Complaint.

5. Two children were born to the parties during the marriage, namely Buck Doe, born March 1, 2000, and Bambi Doe, born March 1, 2005. There are no expectant issue.

6. The minor children of the parties reside with Jane and John at 123 Deer Lane, Pearl, Mississippi 39208, where they have lived since birth. The parties acknowledge and affirm that they have not participated as a party, witness, or in any capacity in any other litigation concerning the custody of said minor children in this or in any other state; that they have no information of any custody proceeding concerning the minor children pending in any Court of this or any other State; and that they do not know of any person, not a party to these proceedings, who has physical custody of the minor children or who claims to have custody or visitation rights with respect to said minor children.

7. The parties separated within the marital home in Rankin County, Mississippi, on or about February 1, 2012, and have not cohabitated as husband and wife since then.

8. The parties desire a divorce on the ground of irreconcilable differences. They intend to enter into a written agreement with respect to the custody and maintenance of their minor children and for the settlement of all marital and property rights existing between the parties.

9. WHEREFORE, the parties respectfully move the Court to grant them a divorce on the ground of irreconcilable differences, upon their presentation to the Court, and the Court's approval, of a written agreement which adequately and sufficiently provides for the custody and maintenance of the minor children of the parties and for the settlement of all property and marital rights and any and all other rights and obligations existing between the parties as a result of their marriage contract and relationship.

JANE DOE

JOHN DOE

STATE OF MISSISSIPPI
COUNTY OF _____

PERSONALLY appeared before me the within named JANE DOE who acknowledged under oath that all of the things set forth in the foregoing *Joint Complaint for Divorce - Irreconcilable Differences* are true and correct as therein stated.

Jane Doe

SWORN TO AND SUBSCRIBED BEFORE ME, this the ____ day of _____, 2012.

NOTARY PUBLIC

My Commission Expires:

STATE OF MISSISSIPPI
COUNTY OF _____

PERSONALLY appeared before me the within named JOHN DOE who acknowledged under oath that all of the things set forth in the foregoing *Joint Complaint for Divorce - Irreconcilable Differences* are true and correct as therein stated.

John Doe

SWORN TO AND SUBSCRIBED BEFORE ME, this the ____ day of _____,
2012.

NOTARY PUBLIC

My Commission Expires:

PREPARED BY:

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