

NORTH CAROLINA
_____ COUNTY

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
____-CVD-____

_____,
Plaintiff,
v.
_____,
Defendant.

**COMPLAINT FOR DIVORCE
FROM BED AND BOARD**

Plaintiff, complaining of Defendant, says:

1. Plaintiff is a citizen and resident of _____ County, North Carolina, and has been for the six months next preceding the filing of this Complaint.
2. Defendant is a citizen and resident of _____ County, North Carolina.
3. Plaintiff and Defendant were married to each other on _____.
4. One child was born of the marriage, namely _____, age ____.
5. Plaintiff and Defendant own the residence at _____, _____, North Carolina, where Plaintiff and the minor child presently reside.
6. North Carolina is the home state of the minor child of the marriage.
7. During the marriage of Plaintiff and Defendant, Defendant has offered indignities to the person of the Plaintiff to render her condition intolerable and her life burdensome in that:
 - (a) He has been gone from home several nights during the week, staying out until as late as ____ a.m. to _____ without explanation.
 - (b) He has told Plaintiff he is not happy, no longer loves her and wants to end their marriage.
 - (c) He has gone on weekend trips, not telling Plaintiff where is he going and not allowing her to question his whereabouts.
 - (d) He has threatened that he will no longer make the mortgage payments on the family home, saying that the home will be sold at a foreclosure sale.
 - (e) He has threatened to “roll over” any funds that he has in _____.
 - (f) He has been indifferent to Plaintiff’s feelings, withdrawing his attention from Plaintiff and refusing to communicate with her.
 - (g) He has told Plaintiff that she must get out of the family home because she is not maintaining it.

8. He has abandoned Plaintiff by moving out of the family home on _____, taking with him certain possessions and refusing Plaintiff's efforts to persuade him to continue living with her and the minor child of the parties.
9. Defendant's actions as set forth above were willful, intentional and without just cause, provocation or fault on the part of Plaintiff.
10. Plaintiff has been a faithful and dutiful wife to Defendant during their _____ years of marriage.
11. Defendant's actions as set forth above are grounds for the Court's granting Plaintiff a divorce from bed and board from Defendant.

WHEREFORE, Plaintiff prays the Court as follows:

1. That she be granted a divorce from bed and board from Defendant.
2. That Defendant be ordered to pay her reasonable attorney fees.
3. That the costs of this action be taxed to Defendant.
4. For such other and further relief as to the Court may seem just and proper.

This the ____ day of _____, 20__.

NC State Bar No. _____
_____, NC _____
Telephone: (____) ____-_____