

**THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

Whitney Roxanne Anderson,

Plaintiff

Civil Action

V.

File No. _____

John Henry Anderson,

Defendant

Complaint for Divorce

Comes now the Plaintiff above named, Whitney Roxanne Anderson, who for cause in this complaint for total divorce and other relief, shows the Court the following:

1.

The Plaintiff is a resident of 123 Anywhere Street, Savannah, CHATHAM County Georgia.

2.

The Defendant has been a bona fide resident of the State of Georgia for an uninterrupted period of more than six months immediately preceding the filing of this action. Therefore, Plaintiff meets the residency requirements for bringing this action.

3.

The parties were married on June 11, 2011 and separated May 30, 2015 having remained since said latter date in an uninterrupted bona fide state of separation.

4.

The Plaintiff is entitled to a divorce from the Defendant upon the following statutory grounds;

- (a) The marriage between the parties is irretrievably broken as contemplated and defined by the laws of the State of Georgia.
- (b) There are no minor children born or adopted to this marriage nor are any to be expected.

WHEREFORE, Plaintiff respectfully prays the Court as follows;

- (a) That the Plaintiff be granted a total divorce upon said statutory ground;
- (b) That the Plaintiff have such other and further relief as the Court finds just and equitable.

Whitney Roxanne Anderson

VERIFICATION

GEORGIA, CHATHAM COUNTY.

Personally appeared before the undersigned officer duly authorized to administer oaths, Whitney Roxanne Anderson, who being first duly sworn, deposes, and under oath says that the foregoing Complaint For Divorce is true in substance and in fact.

Whitney Roxanne Anderson

Sworn to and subscribed before me,
this _____ day of _____, 20____.

Notary Public

My Commission Expires _____.
(NOTARIAL SEAL)

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
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Whitney Roxanne Anderson,

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SUMMONS

TO THE ABOVE NAMED Defendant:

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff, whose name and address is:

123 Anywhere Street
Savannah
Chatham County, Georgia

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusively of the day of service. If you fail to do so, judgement by default will be taken against you for the relief demanded in the complaint.

This _____ day of _____ 20____.

Judge/Clerk, Superior Court,
Chatham County, Georgia

**THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

Whitney Roxanne Anderson
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John Henry Anderson
Defendant

RULE NISI

The foregoing Petition for Divorce having been read and considered, it is hereby
ORDERED that a hearing be held and let any person objecting to the petition show cause if any
he/she can on the _____ day of _____, 20____ .
at _____ o'clock _____.m. at the Chatham County Courthouse why the prayers of the
Plaintiff should not be granted.

SO ORDERED this _____ day of _____, 20____ .

Judge/Clerk, Superior Court,
Chatham County, Georgia

THE SUPERIOR COURT OF CHATHAM COUNTY

STATE OF GEORGIA

Whitney Roxanne Anderson,

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**Appearance, Consent and
Waiver of Summons**

The undersigned Defendant states on oath, that:

1. I have been a resident of the State of Georgia for the preceding six months and therefore meet the residency requirements of the State of Georgia for the filing of this action.
2. Admission: I have received a copy of the Complaint for Divorce which was filed in this cause and I have read and understand it and admit all the allegations in it.
3. Appearance and Waiver: I waive all objections to venue and issuance, service and return of process in this cause and voluntarily enter my general appearance in this cause and submit personally to the jurisdiction of this court. I have never been involved in any other domestic relations proceeding involving the other party in this or any other jurisdiction. I am not currently an active member of any branch of the Armed Forces of the United States.
4. Agreement: I have voluntarily entered into a marital settlement agreement, dated the ____ day of _____, 20____. The marital settlement agreement was signed with no duress or force and without collusion.
5. Consent: I consent to said marital agreement being approved and incorporated, merged into and made part of a Final Decree and that the parties be ordered to comply with all terms and conditions of the marital settlement agreement, but that the marital settlement agreement survive.

6. Additional Consent: I agree that this proceeding is uncontested. I further consent that this cause be heard on any day convenient to the court without further notice to me and that the court enter an Order granting the relief prayed for in the Complaint for Divorce.

7. Additional Waiver: I further waive my rights to any further notice of trial, findings of fact and conclusions of law, a record of testimony, motion for a new trial, notice of entry for the Final Judgement and Decree, and right to appeal but do not waive any rights to any future modifications of any judgement or decree in this cause.

Signature of Defendant

Sworn to and subscribed before me,
this _____ day of _____, 20____.

Notary Public

My Commission Expires _____.
(NOTARIAL SEAL)

**THE SUPERIOR COURT OF CHATHAM COUNTY
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Defendant

Marital Settlement Agreement

We both desire to settle by agreement, all of our marital affairs, on this, the ____ day of _____, 20____

THEREFORE, in consideration of our mutual promises, and other good and valuable consideration, we agree as follows:

All matters of this cause including property, finances and all other aspects of the marriage have been settled and each party shall keep what is in their possession at this time. We both agree to pay the debts in our individual names and not to incur any further indebtedness in the other party's name.

We both agree we wish to live separate and apart from each other on a permanent basis as if we were single according to the terms of this agreement. We each agree not to annoy, harass, or interfere with the other in any manner.

We both agree to cooperate in the filing of any necessary tax returns.

Alimony: We both agree neither party is seeking alimony, maintenance or any other financial relief.

Plaintiff's Signature

Defendant's Signature

Sworn to and subscribed before me,
this _____ day of _____, 20____.

Notary Public

My Commission Expires _____.
(NOTARIAL SEAL)

**THE SUPERIOR COURT OF CHATHAM COUNTY
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FINAL JUDGEMENT AND DECREE

Upon consideration of this case upon evidence submitted as provided by law, it is the judgement of the court that a total divorce be granted, that is to say, a divorce a vinculo matrimonii, between the parties to the above stated case, upon legal principles.

And it is considered, ordered and decreed by the Court that the marriage contract heretofore entered into between the parties to this case, from and after this date, be and is set aside and dissolved fully and effectually as if no such contract had ever been made or entered into, and Plaintiff and Defendant, formerly husband and wife, in the future shall be held and considered as separate and distinct persons altogether unconnected by any nuptial union or civil contract whatsoever.

The Marital Settlement Agreement between the parties filed as a matter of this case dated _____, 20____ is herewith approved by the court and adopted as a part of this Final Judgement and Decree in the same manner as if such agreement had been quoted verbatim herein.

The Plaintiff herein shall have the right to remarry and the Defendant shall have the right to remarry.

The parties are herewith ordered, directed and commanded to abide by the terms and provisions of this Decree, under penalty of contempt of court.

SO ORDERED AND ADJUDGED THIS THE _____ DAY OF _____ 20____,

**Judge, Superior Court
of CHATHAM COUNTY**

