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WENJUN ZHANG
An Attorney at Law
1922 Lincoln Highway
Edison, New Jersey 08817
(732) 339-9066
Attorney for Plaintiff
Xuefeng Bai

RECEIVED and FILED
MAY 12 2015
SUPERIOR COURT OF NEW JERSEY
COUNTY OF HUDSON

XUEFENG BAI,

Plaintiff,

v.

FEI WANG,

Defendant.

SUPERIOR COURT OF NEW JERSEY
FAMILY DIVISION
HUDSON COUNTY

Docket No.: *M-09-2300-15*

Civil Action

VERIFIED COMPLAINT FOR
DIVORCE

Plaintiff, Xuefeng Bai, residing at 201 Dey Street, #143, Harrison, County of Hudson and State of New Jersey, says by way of Complaint against Defendant, Fei Wang:

1. Plaintiff, Xuefeng Bai was lawfully married to Defendant, Fei Wang, on or about February 3, 2003, in a civil ceremony which took place in Jersey City, New Jersey.

2. Plaintiff, Xuefeng Bai, was a bona fide resident of the State of New Jersey when this cause of action arose and has ever since and for more than one year next preceding the commencement of this action continued to be such a bona fide resident. At the time the cause of action accrued, Plaintiff resided in Hudson County, New Jersey.

3. Defendant, Fei Wang, presently resides at 2 Wanke Beijie, Apt. 11-1-401, Chengdu, Sichuan Province, China.

4. During the course of the marriage, Plaintiff, Xuefeng Bai and Defendant, Fei Wang have irreconcilable differences since 2012, which have caused the breakdown of the marriage for a period of more than six months and which make it appear that the marriage should be dissolved, and there is no reasonable prospect of reconciliation.


5. There is one child born of this marriage, to wit: Maddox Xiaotian Bai, d.o.b. November 5, 2009, age 5.

6. There have been no previous matrimonial proceedings between the parties in any court.

WHEREFORE, Plaintiff, Xuefeng Bai, demands judgment:

- a. Dissolving the marriage between the parties;
- b. For child custody and support according to the agreement by the parties;
- c. Distribution of the property acquired during the marriage according to the agreement by the parties; and
- d. Granting such further relief as the Court may deem equitable and just.

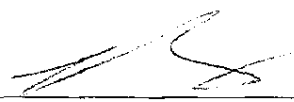
Wenjun Zhang
Attorney for Plaintiff

By: 
Wenjun Zhang, Esq.

Dated: 5/6/2015

CERTIFICATION PURSUANT TO R. 4:5-1(B)(2)

I hereby certify that to the best of my information, knowledge and belief that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding, that no other action or arbitration proceeding is contemplated, and I am not aware of any other person who should be joined in this matter.



Wenjun Zhang, Esq.Dated: 5/6/2015


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COUNTY OF HUDSON

CERTIFICATION OF VERIFICATION AND NON-COLLUSION

Xuefeng Bai, of full age, certifies as follows:

I am the Plaintiff in the foregoing Complaint. The allegations of the Complaint are true to the best of my knowledge, information and belief. The Complaint is made in truth and in good faith and without collusion for the causes set forth therein.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Xuefeng BaiDated: 5/5/2015

AFFIDAVIT OF INSURANCE COVERAGE

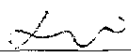
Xuefeng Bai, being of full age, certifies as follows:

1. I am the Plaintiff in the foregoing Complaint.
2. I have following insurance coverage:

Homeowner Insurance:

Company: IDS Property Casualty Insurance Company;
Policy No. HI01102870;
The named insured: Xuefeng Bai and Fei Wang;
Expiration date: 10/14/2015.

3. To the best of my knowledge, there is no any other insurance coverage canceled or modified within the ninety days preceding the commencement of this action.
4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Xuefeng Bai

Dated: 5/5/2015

Sworn and subscribed to before me this 5 day of May 2015.



Notary Public

WENJUN ZHANG
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES NOV. 1, 2016

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CLERK OF SUPERIOR COURT