

**IN THE CIRCUIT COURT  
FOR BALTIMORE COUNTY, MARYLAND**

John Doe  
123 Something Street  
Perry Hall, Maryland 21234

Plaintiff

v.

Jane Doe  
456 Condominium Way  
Unit 34B  
Towson, Maryland 21204

Defendant

Civil No.

**COMPLAINT FOR ABSOLUTE DIVORCE**

Plaintiff John Doe files this Complaint for Absolute Divorce against Defendant Jane Doe. For the reasons that follow, Plaintiff is entitled to an absolute divorce based on irreconcilable differences. Plaintiff further seeks an award of visitation and joint legal custody with respect to the parties' minor child.

1. The parties were married on April 15, 1985 by way of a civil ceremony in Towson, Baltimore County, Maryland, United States of America.
2. Both parties have lived in Maryland for at least 6 months. This Court, therefore, has original jurisdiction over this matter pursuant to MD. CODE, FAM. LAW §§ 1-201, 7-101.
3. Venue is proper in this Court, pursuant to MD. CODE, CTS. & JUD. PROC. § 6-202(1), in that Plaintiff resides in Baltimore County.
4. One child was born as a result of the marriage, namely Little Johnny Doe.

5. My spouse and I have completed and signed a Parenting Plan, and we believe it is in the best interest of the minor child. I have attached the Parenting Plan to this Complaint.

6. I am not seeking alimony.

7. My spouse and I have no marital property that needs to be decided by the court.

8. I am not making any request for use and possession of the family home or any family personal property.

9. My spouse and I have pursued separate lives or lived separate and apart, without interruption, since September 25, 2024.

MD. CODE, FAM. LAW § 9.5-209 INFORMATION

10. I have not participated, as a party or witness or in any other capacity, in any other proceeding concerning the custody of or visitation with the child.

11. I am not aware of any proceeding that could affect the current proceeding, including proceedings for enforcement and proceedings relating to domestic violence, protective orders, termination of parental rights, and adoptions.

12. I am not aware of any person not a party to this proceeding who has physical custody of the child or claims rights of legal custody or physical custody of, or visitation with, the child.

13. Within the past five years, the child's residency information has been as follows:

- From January 18, 2020 until September 25, 2024: Both parents who, at the time, resided at 123 Something Street, Perry Hall, MD 21234.

- From September 25, 2024 until the present: Jane Doe: 456 Condominium Way, Unit 34B, Towson, MD 21204.

END OF SAMPLE

Pages 3-6 Omitted