

**IN THE CHANCERY COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI**

**IN THE MATTER OF THE DISSOLUTION
OF THE MARRIAGE OF M _____ Y
_____ AND MICHAEL PATRICK HOGAN**

CIVIL ACTION NO. _____

JOINT COMPLAINT FOR DIVORCE

COMES NOW, _____ and _____

co-plaintiffs in the above referenced matter and file this their Joint

Complaint for Divorce, and in support thereof would show unto this Court the following facts to-wit:

1.

That _____ is an adult resident citizen of the Hinds County, Mississippi who resides at 2365 _____, _____, Mississippi 39204.

2.

That _____ is an adult resident citizen of the Hinds County, Mississippi who resides at _____, _____, Mississippi 39204.

3.

That parties hereto have been bona fide citizens of the state of Mississippi for more than six (6) months next preceding the filing of this their Joint Complaint for Divorce.

4.

The Co-plaintiffs will show unto the Court that they were united in marriage each to the other in Jackson, Hinds County, Mississippi, on or about November 10, 2006.

5.

That the co-plaintiffs have lived together as husband and wife until May 15, 2006 when they finally and completely separated by not cohabitating with each other in [REDACTED] County, [REDACTED].

6.

That of the marriage one (1) child was born namely [REDACTED] female, born February 16, 2006. That no other children have been born of this marriage, none adopted and none are expected at this time. The aforesaid child is currently living with her mother who is a fit and proper person to care for said children.

7.

Neither [REDACTED] nor [REDACTED] has participated in any other litigation concerning the custody of said children in this or any other state; nor does [REDACTED] or [REDACTED] have any information concerning any custody proceeding in this or any other state. The said [REDACTED] and [REDACTED] know of no person not a party to this action who has physical custody or visitation rights with respect to [REDACTED], a female, born February 16, 2006 or who claims to have custody or visitation rights to said minor.

8.

The parties hereto are members of the Caucasian (white) race.

9.

The co-plaintiffs would show unto the Court that they are unable to live together as

Husband and Wife because of irreconcilable differences that the co-plaintiffs further believe the marriage to be irretrievably broken and the co-plaintiffs assert as their statutory ground for divorce irreconcilable differences as defined by Section § 93-5-2 of the Mississippi Code of 1972 as Annotated.

10.

The co-plaintiffs would further show unto the Court that they have negotiated an Agreement which makes adequate and sufficient provisions for the support and custody of the minor children of the parties and the settlement of all property rights and any and all other rights provided by virtue of their marriage contract. That a copy of the Child Custody and Property Settlement Agreement is attached hereto and made a part hereof as Exhibit "A" same as if copied and words and figures at length herein. The co-plaintiffs request this Court to approve said agreement and incorporate same into the Judgment of Divorce granted to the parties herein.

11.

That _____ AN is represented by _____ who has advised _____ N during the course of his negotiations with _____ and that he is completely satisfied with the services rendered by said legal counsel. Further, that _____ is represented by James L. Manley who has advised _____ during the course of her negotiations with _____ and that she is completely satisfied with the services rendered by said legal counsel

12.

That the parties hereto are not aware of any pending litigation regarding the custody of

the children of the parties nor are they parties to any such litigation.

WHEREFORE, PREMISES CONSIDERED, the co-plaintiffs pray that this their Joint Complaint for Divorce be received and filed, and pray that after their statutory period of sixty (60) days this Court will hear this cause during a regular term of vacation term of said Court, or at such time as this Court deems proper, and will then enter a final judgment herein dissolving the marriage of the parties and granting to them a divorce solely on the grounds of irreconcilable differences. Co-plaintiffs pray that this Court will prove, ratify, and confirm the Child Custody and Property Settlement agreement made between the parties and make same apart of the Judgment of Divorce entered in this cause.

Co-plaintiffs pray of such other relief, either general or special as to which in equity they may be entitled.

THIS the 4 day of January, 2012.

THIS the ___ day of _____, 2012.

STATE OF MISSISSIPPI

COUNTY OF Franklin

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the aforestated county and state, the within named _____ who after being by me first duly sworn states on oath that he has signed, executed and delivered the above and foregoing Joint Complaint for Divorce on the day and year therein shown as his own free act and deed and that all facts and matters set forth therein are true and correct.

GIVEN UNDER MY HAND AND OFFICIAL SEAL OF OFFICE, this the 4 day of January, 2012.



Claudia Gillispie
NOTARY PUBLIC

MY COMMISSION EXPIRES:

STATE OF MISSISSIPPI

COUNTY OF _____

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the aforestated county and state, the within named _____ who, after being by me first duly sworn states on oath that she has signed, executed and delivered the above and foregoing Joint Complaint for Divorce on the day and year therein shown as her own free act and deed and all facts and matters set forth therein are true and correct.

GIVEN UNDER MY HAND AND OFFICIAL SEAL OF OFFICE, this the ___ day of _____, 2012.

NOTARY PUBLIC