

**VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF VIRGINIA BEACH**

**SAMPLE HUSBAND,**

**Plaintiff,**

**v.**

**CASE NO.: CL \_\_\_\_\_**

**SAMPLE WIFE,**

**Defendant.**

**COMPLAINT**

Plaintiff, Sample Husband, by counsel, in support of his Complaint states follows:

1. Plaintiff and Defendant, Sample Wife, were married on July 8, 2014 in Virginia Beach, Virginia.

2. Plaintiff has been an actual bona fide resident of, and has been domiciled in, the Commonwealth of Virginia for more than six (6) months next preceding the institution of this suit.

3. Plaintiff and Defendant last cohabited as husband and wife in Virginia Beach, Virginia.

4. Plaintiff and Defendant are over the age of 18 years and are of sound mind. Plaintiff is an active duty member of the United States Military; Defendant is not an active duty member of the United States Military. Neither party is incarcerated in any penal or mental institution.

5. There were no minor children born of either party and adopted by the other, or adopted by both parties, and Defendant is not currently pregnant with Plaintiff's child.

6. Plaintiff and Defendant have lived separately and apart, without any cohabitation and without interruption, with the intent of permanently dissolving the marital

relationship, for a period of one (1) year or more, to-wit: July 8, 2015. Reconciliation is not possible.

WHEREFORE, Plaintiff prays that he be awarded a decree of divorce *a Vinculo Matrimonii* from Defendant pursuant to Section 20-91(9)(a), Code of Virginia, on the grounds that the parties hereto have lived separately and apart, without any cohabitation and without interruption, for one (1) year or more; that the Agreement Regarding Separation, Support and Division of Property be affirmed, ratified and incorporated, but not merged by this Court in its decree of divorce *a Vinculo Matrimonii*; and that Plaintiff may have such other and further relief as may be necessary and proper herein.

Respectfully submitted,  
SAMPLE HUSBAND

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COMMONWEALTH OF VIRGINIA,  
CITY OF VIRGINIA BEACH, to-wit:

The foregoing instrument was acknowledged before me this \_\_\_ day of \_\_\_\_\_, 2016, by Sample Husband, personally known by me, or identified by me through satisfactory evidence of identity, and whose signature was voluntarily affixed by the individual for the purposes stated.

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NOTARY PUBLIC

My commission expires: \_\_\_\_\_  
My commission no.: \_\_\_\_\_