



**IN THE CIRCUIT COURT
FOR TUSCALOOSA COUNTY, ALABAMA**

DIANNE JONES BENTLEY)

Plaintiff,)

v.)

ROBERT J. BENTLEY)

Defendant.)

CASE NO.

DR _____

COMPLAINT

1. Plaintiff and Defendant are both over the age of nineteen (19) years, are bona fide residents of the state of Alabama and have been residents of the state of Alabama for more than six (6) months next preceding the filing of this Complaint.

2. Plaintiff and Defendant were lawfully married to each other on or about July 24, 1965, and lived together thereafter as husband and wife until they separated on or about January 2015.

3. There were four (4) children of the marriage, all having attained the age of majority, and the Plaintiff is not pregnant.

4. Plaintiff states that there is such a complete incompatibility of temperament that the parties can no longer live together. That there exists a conflict of personalities which destroys the legitimate aims of matrimony and all possibilities of reconciliation are futile.

5. Plaintiff further avers that their marriage has suffered an irretrievable breakdown and that further attempts at reconciliation are impractical and not in the best interests of the parties.

6. Plaintiff states that the Plaintiff and Defendant have accumulated, during the marriage of the parties, an interest in or title to certain properties including cash, real estate, furniture, furnishings, automobiles, and other property.

7. Plaintiff further avers that the Plaintiff and Defendant have incurred certain debts during the marriage of the parties.

8. Plaintiff further avers that she is without sufficient funds with which to support herself and to pay her attorney of record for his services rendered to her in this cause. Plaintiff

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further avers that the Defendant is an able-bodied man, gainfully employed, and is well able to pay the debts of the parties incurred during the marriage, to pay to the Plaintiff a reasonable sum for her support and maintenance, and to pay to the Plaintiff a reasonable sum with which to pay her attorney of record for his services to her in this cause.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Court will take jurisdiction of this cause, that the said *ROBERT J. BENTLEY* be made a party defendant to this Complaint, that service of process be issued to him as required by law and the rules of this Honorable Court, making him a party defendant to this cause and requiring him to plead, answer or otherwise defend this action within the time prescribed by law and the rules of this Court; or, failing that, suffer a default judgment against him. Further, that upon a final hearing of this cause, your Honor will grant to the Plaintiff an absolute divorce from the Defendant.

Plaintiff further prays that the Court will make an equitable and fair division of all personal property acquired by the parties during the marriage.

Plaintiff further prays that the Court order the Defendant to pay to Plaintiff a fair amount for alimony in gross and also pay to her periodic alimony.

Plaintiff further prays that the Court will award to her sole title to the real property acquired by the parties during the marriage.

Plaintiff further prays that the Court order the Defendant to pay the debts incurred by the parties during the marriage.

Plaintiff further prays that the Court order the Defendant to pay to her a reasonable sum with which to pay her attorney of record.

Plaintiff prays for such other, further, different or more general relief to which she may be entitled.



 DIANNE BENTLEY

STATE OF ALABAMA)
 \--f-A-.<.f} COUNTY)

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared _____, *DIANNE BENTLEY*, who, being first duly sworn, deposes and says that

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the matters and things contained in the foregoing Complaint are true and correct to the best of her knowledge and information.

Dionne Bentley
L.F.

Sworn to and subscribed before me this ^{-th} ~~2k~~ day of *August*, 2015.

[Handwritten Signature]
NOTARY PUBLIC

[Handwritten Signature]

L. STEPHEN WRIGHT, JR. (WRI003)
Attorney for Plaintiff
NAJAR DENABURG, P.C.
2125 Morris Avenue
Birmingham, AL 35203
(205) 250-8464

Plaintiffs Address:



Defendant's Address:

