NORTH CAROLINA ) IN THE GENERAL COURT OF JUSTICE

) DISTRICT COURT DIVISION

MECKLENBURG COUNTY )

JANE DOE, )

)

Plaintiff, ) COMPLAINT FOR CHILD SUPPORT

)

-vs- )

)

JOHN DOE, )

)

Defendant. )

NOW COMES THE PLAINTIFF, **Jane Doe**, complaining of the Defendant, alleges and says:

1. The Plaintiff is a citizen and resident of **Mecklenburg County, North Carolina**.
2. The Defendant is a citizen and resident of **Mecklenburg County, North Carolina**.
3. That the parties are the parents of **one minor child, James Doe born on November 12, 2012**.
4. That the Defendant is a “Responsible Parent” as defined by N.C.G.S. 110-129(3) and has a legal duty to provide support.
5. The minor child/ren is/are in need of support from Defendant for the child’s health maintenance, and education including medical insurance coverage.
6. The Defendant has failed or refused to adequately contribute to the support and maintenance of his minor child/ren.
7. The Plaintiff, pursuant to Article 9 Chapter 110 of N.C.G.S. 50-13.4, is entitled to an Order obligating the Defendant to pay support for his minor child/ren.
8. The Defendant has failed to pay support or adequate support in the past, the Plaintiff is entitled to reimbursement from the Defendant for his share of the reasonable and necessary expenditures for the support for the minor child/ren.
9. Defendant is and has been an able bodied person, capable of providing child support through all times relevant to this action.

WHEREFORE THE PLAINTIFF PRAYS THE COURT:

1. Order the Defendant to provide such continuing support and maintenance for said child/ren, in an amount to be determined for each child, as required by the North Carolina Child Support Guidelines, N.C.G.S. 50-13.4.
2. Require the Defendant to reimburse the caretaker or Plaintiff for Defendant’s share of expenditures previously expended by the caretaker or Plaintiff pursuant to N.C.G.S. 50-13.4(c).
3. Order the Defendant to provide medical insurance coverage or medical support for said dependent child/ren pursuant to N.C.G.S. 50-13.11.
4. Order all sums be paid through NC Child Support Centralized Collections.
5. Order immediate income withholding from the Defendant’s wages or other sources of disposable income.
6. Order the Defendant taxed with the costs of this action, and the share of costs attributed to reasonable attorney’s fees.
7. That the Plaintiff have and recover such other and further relief as to the Court may seem just and proper.

This the \_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_, 2015.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Jane Doe

1234 Park Lane

Charlotte, NC 28204

(704) 535-1234

STATE OF NORTH CAROLINA

COUNTY OF MECKLENBURG

**VERIFICATION**

**Jane Doe**, being first duly sworn, deposes and says that s/he is the Plaintiff in the above-captioned matter; that s/he has read the foregoing Complaint and knows the contents thereof and that the same are true to his/her own knowledge except as to those matters stated on information and belief, and as to those matters she believes them to be true.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Jane Doe**

SWORN TO AND SUBSCRIBED BEFORE ME

this the \_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2015.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public

My Commission Expires:\_\_\_\_\_\_\_\_\_\_\_\_\_