**IN THE SUPERIOR COURT OF FULTON COUNTY**

**STATE OF GEORGIA**

**JULIA ROSE** )

)

**Plaintiff,** ) **CIVIL ACTION**

)

**v.** ) **FILE NO.:** 1234451

)

**RICHARD ROSE**  )

)

**Defendant.** )

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**COMPLAINT FOR DIVORCE AND OTHER RELIEF**

COMES NOW Plaintiff, Julia Rose (“Plaintiff”), in the above-captioned action by and through her attorneys states as follows:

Plaintiff has been a resident of the State of Georgia for more than six (6) months immediately prior to filing this *Complaint for Divorce and Other Relief* (“Complaint”).

Richard Rose (“Defendant”), Defendant herein is a resident of Fulton County, Georgia and is subject to the jurisdiction of this Court.

Defendant has acknowledged service of process, consented to the jurisdiction and venue and has consented to this present case.

Plaintiff and Defendant were lawfully married on July 23, 2012 and ever since have been and are now Husband and Wife.

Plaintiff and Defendant are currently living in a bona fide state of separation.

Plaintiff is entitled to a divorce from Defendant on the grounds that the marriage is irretrievably broken as defined in [O.C.G.A. § 19-5-3(13)](https://advance.lexis.com/document/?pdmfid=1000516&crid=291a715b-b837-44ec-9cac-f36de9f777c5&pddocfullpath=%2Fshared%2Fdocument%2Fbriefs-pleadings-motions%2Furn%3AcontentItem%3A5SPF-CR70-01MK-B45W-00000-00&pdcontentcomponentid=349753&pdteaserkey=sr18&pditab=allpods&ecomp=gxdsk&earg=sr18&prid=7053abe5-f373-4a94-9771-2247e040a114) and there are no prospects for reconciliation. Plaintiff reserves his/her right to add additional grounds for divorce as permitted by law.

There are two children born as issue of this marriage, *to wit*: Roger Rose, male, born on January 25, 2015 and Rachel Rose, female, born on October 7, 2017 (collectively hereinafter the “Children”).

Plaintiff has entered a Parenting Plan with Defendant on September 25, 2020 related to the custody and visitation of the children, a copy of which is attached hereto and made a part hereof as **Exhibit A**. Plaintiff requests this Court to incorporate said Parenting Plan into the Final Judgment and Decree of Divorce.

Plaintiff has entered into a Settlement Agreement with Defendant on October 15, 2020 on issues related to child support and expenses, and all marital property and debts, including the marital residence, personal property, retirement assets, alimony, and the joint and marital debt of the parties. A copy of the Settlement Agreement is attached hereto and made a part hereof as **Exhibit B**. Plaintiff requests this Court to incorporate said agreement into the Final Judgment and Decree of Divorce.

The parties file contemporaneously with the Complaint their Financial Affidavits and Child Support Guidelines.

Plaintiff’s former or maiden name is Rose, and Plaintiff is requesting the Court to restore that name to her.

The undersigned counsel represents Plaintiff and prepared the Parenting Plan and the Settlement Agreement.

FOR THESE REASONS, PLAINTIFF REQUESTS THE FOLLOWING RELIEF:

1. That service and process issue and Defendant be served with a copy of the Summons and this Complaint for Divorce and Other Relief;
2. That the Standing Order of the Court in domestic cases issue;
3. That Plaintiff and Defendant be granted a total divorce, that that is a divorce a vinculo matrimonii in terms of law, from Defendant;
4. That the Court adopt and incorporate the terms and conditions of the parties’ Settlement Agreement. Parenting Plan, and child support documents into the Final Judgment and Decree of Divorce in this matter;
5. That the court retain jurisdiction of all parties, minor child/children, and subject matter of this total divorce for all proper and enforcement purpose; and
6. That Plaintiff be awarded such other and further relief as this Court deems equitable and just.

Dated: October 20, 2020. **BILLEM LLP**

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William Billem

Attorney for Plaintiff

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