

IN THE COMMON PLEAS COURT OF MONTGOMERY COUNTY, OHIO
DIVISION OF DOMESTIC RELATIONS

JOANNA SULLIVAN
1199 Durham Drive
Centerville, Ohio 45459
DOB: 11/18/1985

: Case No.
: Judge Cross/Wood

Wife,

v.

BRENDAN SULLIVAN
1199 Durham Drive
Centerville, Ohio 45459
DOB: 02/23/1976

: **COMPLAINT FOR DIVORCE**

Husband.

Now comes the Wife, **JOANNA SULLIVAN**, by and through Counsel, and for her Complaint states as follows:

1. Wife has been a resident of the State of Ohio for at least six (6) months and of Montgomery County for ninety (90) days immediately preceding the filing of this Complaint.
2. The parties were married on October 19, 2019, in Wilmington, Ohio and there one minor child to wit: Lucie Hope Sullivan, whose DOB is 06/04/2021. Wife is not currently pregnant.
3. Husband and Wife have resided in the State of Ohio during their marriage until the date of separation 08/04/2024.
4. Husband is NOT active military.
5. Wife says that the parties are incompatible as set forth in O.R.C. € 3105.01(K) and that she alleges Husband is guilty of gross neglect of duty.

The Law Offices of
Borger & Brandenburg

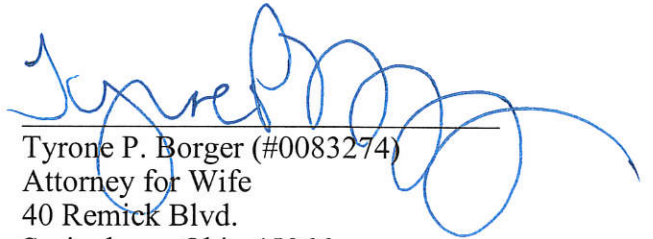


40 Remick Boulevard
Springboro, Ohio 45066
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WHEREFORE, Wife prays that she be granted the following:

1. An absolute Decree of Divorce from Husband;
2. An equitable division of property and assets;
3. All other equitable relief that this Court deems just.

Respectfully submitted,



Tyrone P. Borger (#0083274)
Attorney for Wife
40 Remick Blvd.
Springboro, Ohio 45066
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Email: tborger-law@cinci.rr.com

PRAECIPE FOR SERVICE

Please serve a copy of the foregoing by certified US Mail, return receipt requested upon the following:

BRENDAN SULLIVAN
1199 Durham Drive
Centerville, Ohio 45459



Tyrone P. Borger (#0083274)
Attorney for Wife

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