



IN THE CIRCUIT COURT OF JEFFERSON COUNTY,
BESSEMER DIVISION

ERICKA PHILLIPS POE,

Plaintiff,

v.

VAUGHN POE,

Defendant.

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CIVIL ACTION NO.

DR 2016 _____

COMPLAINT FOR DIVORCE

COMES NOW the Plaintiff and files this Complaint for divorce and states as follows:

1. That Plaintiff and Defendant are both over the age of 19 years and have resided in the State of Alabama for the six (6) months next preceding the filing of this complaint.
2. That the parties were lawfully married on April 19, 2003 and lived together until on or about July 15, 2010, wherein they separated and have not lived together as husband and wife since that date.
3. There was one (1) child born to the parties during the marriage herein, namely: Catlynn Poe, date of birth, July 15, 2008. The Plaintiff is **NOT** now pregnant.
4. Plaintiff alleges that there is such an incompatibility between the parties that they can no longer live together as husband and wife.
5. Plaintiff further alleges that an irretrievable breakdown of the marriage has occurred and that further attempts at reconciliation are impractical and futile and not in the best interest of the parties.

6. Plaintiff states that she is the proper person to have the care, custody and control of the parties' minor child.

7. Plaintiff states that the Defendant is gainfully employed, earning a good income and financially able to provide support and maintenance for the parties' minor child.

8. Plaintiff alleges that she is in need of support and maintenance from the Defendant and states further that the Defendant is gainfully employed, earning a good income and having the means to provide alimony to the Plaintiff.

9. Plaintiff alleges that the parties have accumulated real and personal property throughout the course of the marriage.

10. Plaintiff alleges that the parties have accumulated numerous debts during the marriage.

11. Plaintiff alleges that she is without funds with which to pay for the services of attorney in this cause and states that the Defendant is gainfully employed, earning a good income and is financially able to pay the Plaintiff's attorney a reasonable sum for his services in this matter.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff prays that proper process will issue out of this Honorable Court, making **Vaughn Poe** a party Defendant hereto, requiring him to file an answer within the time and manner required by law or suffer a default judgment herein. Plaintiff further prays that upon a final hearing of this cause:

- A. The parties be granted a complete and final divorce;
- B. That the Plaintiff be granted the care, custody and control of the parties' minor child;

C. That the Defendant be ordered to pay a sum certain as support and maintenance for the parties' minor child based on the state Child Support Guidelines;

D. That the Defendant be ordered to pay a sum certain as alimony to the Plaintiff;

E. That the Court make an equitable division of all the real and personal property and other assets of the marriage;

F. That the Court make an equitable division of the payment of all debts of the marriage;


G. That the Defendant be Ordered to pay a reasonable amount to the Plaintiff's attorney for attorney's fees and pay all costs of Court;

H. For any such other, further and different relief as the Plaintiff may be entitled.


 ERICKA PHILLIPS POE
 PLAINTIFF

STATE OF ALABAMA)
)
 JEFFERSON COUNTY)

Before me, the undersigned authority, in and for said State and County, personally appeared **Ericka Phillips Poe**, who is known to me and who, after first being duly sworn, deposes and says that the facts and averments contained in the foregoing Petition are true and correct.


 NOTARY PUBLIC
 My Commission expires: 9-13-17

s/ Kelly R. Knight
 KELLY R. KNIGHT (KNI 026)
 Attorney for Plaintiff

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ATTORNEY WILL SERVE