

### ***Step-by-Step Directions for Filling Out Form 19 (Complaint in Divorce):***

- Fill in the caption as in Form 18 (page 59).
- Now go to the body of the Complaint (the part underneath the heading “Dissolution of Marriage”).
  - Paragraph 1: Type or print your name exactly as it appears on the marriage certificate, and use that full name throughout the pleading (*see (d) in Sample Form 19*). Type or print in your full address (*see (e) in Sample Form 19*).
  - Paragraph 2: Type or print your spouse’s name exactly as it appears on the marriage certificate, and use that full name throughout the pleading (*see (f) in Sample Form 19*). Type or print in his or her address (*see (g) in Sample Form 19*).
  - Paragraph 3: If both you and your spouse have been residents of Pennsylvania for six (6) months, type or print in “both have” and “residents.” If only you have been a resident of Pennsylvania for six (6) months, type or print in “Plaintiff has” and “a resident” (*see (h) in Sample Form 19*).
  - Paragraph 4: Type or print in the date of and the place (city and state) of your marriage (*see (i) and (j) in Sample Form 19*).
  - Paragraph 5: If your spouse is in the military service, you must state that fact.
  - Paragraph 6: If the statement in paragraph 6 is not true, you cannot file.
  - Paragraph 7: This manual does not give you the steps to take if there is a written agreement.
  - Paragraph 8: Type or print in “he” or “she,” whichever is appropriate (*see (k) in Sample Form 19*).
  - Paragraph 9: Paragraph 9: This is where you give the basis for the divorce. It is recommended that you include the bases for both the “c” and “d” divorces. This way, if your spouse refuses to consent, you can proceed with a two year separation divorce, or, if your spouse changes his/her mind and decides to agree to the divorce, you will be prepared to finalize a mutual consent divorce. Write in: *The marriage is irretrievably broken and plaintiff believes defendant will consent to the divorce. The marriage is irretrievably broken and the parties will have been separated for two years or more at the time of final disposition of this case. (See (l) in Sample Form 19).*
- Sign your full name, as it appears on the marriage certificate, using blue ink (*see (m) in Sample Form 19*).
- Type or print your full name under the signature line followed by “Pro Se” (*see (n) in Sample Form 19*).
- Under the section titled “Verification,” sign your name in blue ink, type or print your full name followed by “Plaintiff,” and write in the date you signed it (*see (o), (p), (q) in Sample Form 19*).



WHEREFORE, Plaintiff requests your Honorable Court to enter a decree in divorce pursuant to Section 3301(c) or 3301(d) of the Divorce Code.

(m) Jane Smith Doe  
(n) JANE SMITH DOE, Pro Se

### VERIFICATION

Plaintiff verifies that the statements made in this Complaint in Divorce are true and correct. Plaintiff understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

(o) Jane Smith Doe  
(p) JANE SMITH DOE, Plaintiff

DATE (q) 1/04/06

***HINT: You can file this complaint naming both no-fault grounds (mutual consent, Section 3301(c), and two-year separation, Section 3301(d)). If your spouse signs the consent affidavit, you can proceed using that ground and drop the other; if your spouse refuses to sign the consent affidavit, then after you have been separated for two years you can proceed on the grounds of a two-year separation.***

Attorney for Plaintiff

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Plaintiff, : COURT OF COMMON PLEAS  
vs. : PHILADELPHIA COUNTY  
 : FAMILY DIVISION  
 :  
Defendant. : TERM, 20  
 : NO.

**COMPLAINT IN DIVORCE  
COUNT I  
Dissolution of Marriage**

1. Plaintiff, \_\_\_\_\_, currently resides at \_\_\_\_\_.
2. Defendant, \_\_\_\_\_, currently resides at \_\_\_\_\_.
4. Plaintiff and defendant are sui juris, and \_\_\_\_\_ been \_\_\_\_\_ of the Commonwealth of Pennsylvania for a period of more than six (6) months immediately preceding the filing of this Complaint.
4. The parties were married on \_\_\_\_\_, in \_\_\_\_\_. A photocopy of the marriage certificate is attached hereto, made a part hereof and marked as Exhibit "A."
5. Neither plaintiff nor defendant is in the military or naval service of the United States or its allies within the provisions of the Service Members' Civil Relief Act.
7. There have been no prior actions of divorce or for annulment between the parties.
7. The parties have not entered into a written agreement as to equitable distribution of marital property, alimony, alimony pendente lite, spousal support, counsel fees and costs.
8. Plaintiff acknowledges that \_\_\_\_\_ has been advised of the availability of counseling between the parties and that \_\_\_\_\_ may have the right to request that the court require that parties to participate in such counseling in certain instances.

9. Plaintiff alleges the following grounds for the dissolution of the marriage: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

WHEREFORE, Plaintiff requests your Honorable Court to enter a decree in divorce pursuant to Section 3301(c) or 3301(d) of the Divorce Code.

\_\_\_\_\_

**VERIFICATION**

Plaintiff verifies that the statements made in this Complaint in Divorce are true and correct. Plaintiff understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

\_\_\_\_\_

DATE \_\_\_\_\_