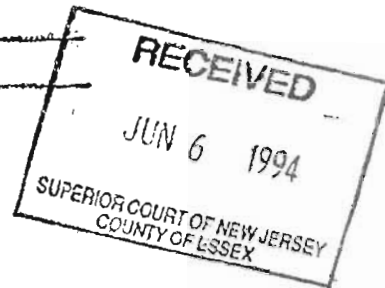


RECORDED/PAID  
PAY TYPE: CA ~~OK~~ ~~NO~~ ~~OK~~  
PAYER: ~~PLN~~ PLN ATTY  
DEF DEF ATTY  
OTHER (NAME) \_\_\_\_\_  
CHK/CHG ACCT. # 41950  
AMOUNT (\$) 100.00



**HARRIS, DICKSON, BUERMANN, TANNER**  
**ASHENFELTER, SLOUS, FOX & BOYD**  
250 Bellevue Avenue, P. O. Box 760  
Upper Montclair, New Jersey 07043  
(201) 744-2100  
Attorneys for Nancy G. LaVigne, Plaintiff

**NANCY G. LAVIGNE,**  
*Plaintiff,*  
- vs -  
**WILLIAM SPELMAN,**  
*Defendant.*

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
ESSEX COUNTY

Docket No. FM-16504-94

Civil Action

COMPLAINT FOR DIVORCE

Plaintiff, Nancy G. LaVigne, residing at 65 North Fullerton Avenue, Montclair, Essex County, New Jersey 07042 by way of Complaint against defendant, William Spelman, states:

1. She was lawfully married to William Spelman, the defendant herein, on November 2, 1990 in a religious ceremony in Austin, Texas. 11/2 1991

2. She was a bona fide resident of the State of New Jersey when this cause of action arose and has ever since and for more than one year next preceding the commencement of this action continues to be such bona fide resident. At the time the within cause of action arose, the plaintiff resided at 65 North Fullerton Avenue, Montclair, Essex County, New Jersey 07042.

3. The defendant resides at 65 North Fullerton Avenue, Montclair, Essex County, New Jersey 07042.

4. The defendant has been guilty of extreme cruelty toward the plaintiff commencing in or about 1991 and continuing from that date until the present.

5. Particularly specifying the acts of extreme cruelty committed by the defendant, plaintiff says:

a. Throughout the marriage, the defendant has been frequently late in returning home, often an hour or more later than promised without according the plaintiff the courtesy of letting her know where he was and when he would return. At plaintiff's going away party, the defendant arrived one and one-half hours late.

b. The defendant was deceitful to plaintiff on numerous occasions during the marriage. As an example, he presented her with a birthday gift of a sapphire to replace the stone then in her engagement ring. The plaintiff was thrilled with the gift and when she called the jeweler, a mutual friend, to thank him for his help in purchasing the stone, she was informed that the stone was a fake.

c. Since at least 1994, the defendant has carried on an intimate relationship with Ms. Niyanta P. Thomas, a student of his. He has flaunted his relationship with Ms. Thomas in

front of the plaintiff's academic colleagues and has caused extreme embarrassment to the plaintiff. In addition, he has been dishonest to the plaintiff, corresponding secretly with Ms. Thomas and spending time with her when he told the plaintiff that he was travelling on business.

6. The above named acts of extreme cruelty make it improper and unreasonable to expect the plaintiff to continue to cohabit with the defendant.

7. More than three months have elapsed since the last act of extreme cruelty complained of as constituting the plaintiff's cause of action herein. The extreme cruelty committed by the defendant within a period of three months before the filing of this Complaint, as set forth above, is alleged not as constituting in whole or in part the cause of action as set forth herein, but as relating back to qualify and characterize the extreme cruelty constituting said cause of action.

8. The defendant has committed adultery on various occasions during 1994 in New York City and in Austin, Texas with a woman named Niyanta P. Thomas.

9. There have been no children born of the marriage.

10. There have been no previous proceedings between the plaintiff and defendant respecting the marriage or its

dissolution or respecting maintenance of the plaintiff or defendant in any court.

11. The parties have acquired property, both real and personal, during the marriage which is the subject of equitable distribution.

WHEREFORE, plaintiff demands Judgment as follows:

- a. Dissolving the marriage between the parties;
- b. Equitably distributing all property, both real and personal, owned or acquired by the parties during the marriage;
- c. Compelling the defendant to support the plaintiff;
- d. Directing payment of the plaintiff's counsel fees and costs; and
- e. Granting such further relief as this Court may deem equitable and just.

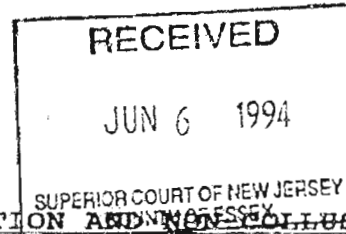
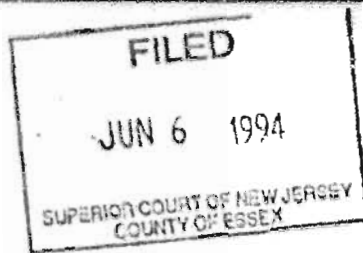
HARRIS, DICKSON, BUERMANN, TANNER,  
ASHENFELTER, SLOUS, FOX & BOYD  
Attorneys for the Plaintiff

By:



Barbara S. Fox

DATED: June 6, 1994.



CERTIFICATION OF VERIFICATION AND NON-COLLUSION

I am the plaintiff in the foregoing Complaint for Divorce. The allegations of the Complaint for Divorce are true to the best of my knowledge, information and belief. The said Complaint for Divorce is made in truth and good faith and without collusion for the causes set forth herein.

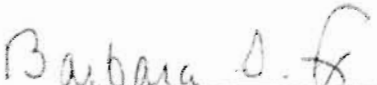
I certify that the foregoing statements made by me are true. I am aware that if they are willfully false, I am subject to punishment.

  
Nancy G. Lavigne

DATED: June 6, 1994.

CERTIFICATION PURSUANT TO 4: 5-1

I hereby certify that the within matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding and no other action or arbitration proceeding is contemplated. I know of the name of no other party who should be joined in this action.

  
Barbara S. Fox

DATED: June 6, 1994.

HARRIS, DICKSON, BUERMANN, TANNER  
ASHENFELTER, SLOUS, FOX & BOYD  
250 Bellevue Avenue, P. O. Box 760  
Upper Montclair, New Jersey 07043  
(201) 744-2100

Attorneys for Nancy G. LaVigne, Plaintiff

FILED  
FEB 21 1995

HERBERT S. GLICKMAN  
J.S.C.

NANCY G. LAVIGNE,  
*Plaintiff,*

- vs -

WILLIAM SPELMAN,  
*Defendant.*

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
ESSEX COUNTY

Docket No. FM-16564-94

Civil Action

JUDGMENT OF DIVORCE  
-----

THIS MATTER having come before The Honorable Herbert S. Glickman, J.S.C. on the 9th day of January 1995 in the presence of Harris, Dickson, Buermann, Tanner, Ashenfelter, Slous, Fox and Boyd, (Barbara S. Fox, Esq. appearing) attorneys for plaintiff, and a default having been duly entered against the defendant for failure to plead or otherwise defend as provided by the Rules of Court, and the Court having permitted the plaintiff to amend her Complaint to correct the year of the marriage to 1991, and having heard and considered the Complaint and proofs, and it appearing that plaintiff and defendant were lawfully married on November 2, 1991 and the plaintiff having pleaded and proved a cause of action for divorce under N.J.S.A. 2A: 34-2 (c), in such case made and provided, and the plaintiff having been a bona fide

resident of this State for more than one year next proceeding the commencement of the action, and it appearing that jurisdiction herein has been acquired over the defendant pursuant to the Rules Governing the Courts.

IT IS on this 21<sup>st</sup> day of ~~January~~ Feb. 1995;

ORDERED AND ADJUDGED that pursuant to the statute in such case made and provided, the marriage between the parties Nancy G. LaVigne and William Spelman, he and the same is hereby dissolved; and it is further

ORDERED AND ADJUDGED as follows:

1. The former marital home located at 2502 Hartford Road, Austin, Texas will be listed for sale within thirty (30) days of the entry of this Judgment of Divorce. Upon sale, the net proceeds will be distributed sixty (60%) percent to the defendant and forty (40%) percent to the plaintiff subject, however, to the credits to plaintiff set forth hereinafter.

2. The piano will be the sole property of the defendant, and plaintiff will receive a credit in the amount of \$2,375.00 from the proceeds of sale. Defendant will indemnify and hold harmless plaintiff on the outstanding balance of the loan on the piano. Defendant will pay in full the outstanding loan balance within thirty (30) days of the entry of this Judgment of Divorce.



3. The 1987 Toyota Camry in the possession of the plaintiff is the sole property of the plaintiff, and the defendant shall transfer title to the plaintiff within thirty (30) days of the entry of this Judgment of Divorce.

4. Defendant's 401K pension plan is the sole property of defendant and plaintiff has no claim thereto.

5. Each party will retain the household furnishings in his or her possession and neither party shall have any claim against the furnishings or possessions presently in the possession of the other party.

6. Defendant will give to plaintiff the sum of \$600.00 on account of the refrigerator which he has retained in his possession.

7. Defendant will pay to plaintiff the sum of \$10,000.00 as rehabilitative alimony to be paid in a lump sum upon sale of the marital home.

8. Defendant will pay to plaintiff the sum of \$ 3000.00 for her counsel fees in connection with this action.

*Herbert S. Glickman*

HERBERT S. GLICKMAN, J.S.C.

Certified to be a true copy  
of the original on file in the  
Superior Court Clerk's Office

*Jennifer M. Perez*

JENNIFER M. PEREZ, CLERK  
SUPERIOR COURT CLERK'S OFFICE 3 -

