DOCKET NO: : SUPERIOR COURT

JOHN DOE : J.D. OF NEW HAVEN

V. : AT NEW HAVEN

JANE DOE : AUGUST \_\_, 20

PLAINTIFF’S PRE-TRIAL MEMO AND PROPOSED ORDERS

1. BACKGROUND
	1. Date of Marriage:
	2. Ages: Wife: Age 32 (Insert DOB)

Husband: Age 37 (Insert DOB)

* 1. Children: Name and DOB
	2. Residence: The Wife resides in \_\_\_\_\_\_\_\_, CT with the minor child. The Husband resides in \_\_\_\_\_\_\_\_\_.
	3. Health of the parties Insert info if relevant
	4. Employment: Wife: Self Employed recruiter earning $2,480 per week. The Wife did not work during most of 2014 or 2015, as she was caring for the minor child. Prior to 2014, she earned approximately $55,000.00 per year.

Husband: W-2 Employee who earns $1,025 per week. However, he also has another job, not listed on his financial affidavit, earning $20.00 per hour cash working three 5 hour night shifts per week, for a total additional income of $300.00 per week.

* 1. Cause of the Breakdown: ***Insert Relevant Info***
1. PROPOSED ORDERS
	1. Parenting Plan
	2. Alimony
	3. Child Support
	4. Unreimbursed Medical Expenses and Work-Related Childcare
	5. Assets
		1. Marital Home
		2. Retirement Accounts
		3. Bank Accounts
		4. Automobiles
		5. Personal Property
		6. Custodial Accounts of the Minor Child
2. LIABILITIES
3. MEDICAL INSURANCE
4. LIFE INSURANCE
5. TAXES
6. EDUCATIONAL SUPPORT ORDER

THE PLAINTIFF

 JOHN DOE

 By: 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510

CERTIFICATE OF SERVICE

 I hereby certify that a copy of the foregoing was electronically sent to the following counsel of record on this \_\_ day of August, 20\_\_:

**Insert contact info for all parties of record here (except yourself)**

 441084

 Matthew F. Dolan

 Dolan Divorce Lawyers, PLLC

 129 Whitney Avenue

 New Haven, CT 06510