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**IN THE CHANCERY/CIRCUIT COURT OF SHELBY COUNTY, TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT**

SARAH SUSAN SHIPMAN SMITH,

Plaintiff,

vs.

DOCKET NO._____

STEVEN SCOTT SMITH,

Defendant.

PART/DIVISION_____

COMPLAINT FOR ABSOLUTE DIVORCE

TO THE HONORABLE CHANCELLORS AND CIRCUIT COURT JUDGES OF SHELBY
COUNTY, TENNESSEE:

Comes now the Plaintiff, SARAH SUSAN SHIPMAN SMITH, also referred to as
“WIFE,” and sues the Defendant, STEVEN SCOTT SMITH, also referred to as “HUSBAND,”
for an absolute divorce, and for cause of action would respectfully state and show to the Court as
follows:

I.

JURISDICTION

That Plaintiff is an adult resident of Shelby County, Tennessee and has been for more
than six (6) months preceding the filing of this Complaint for Divorce. The Defendant is an
adult resident of Shelby County, Tennessee and has been for more than six (6) months preceding
the filing of this Complaint for Divorce. The acts complained of were committed while the
parties were residents of Tennessee.

II.

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STATISTICAL DATA

The Plaintiff would show the following statistical information concerning the parties in the marriage is true and correct as required by T.C.A. 36-4-106:

WIFE:

- a. Full maiden name of Wife: Sarah Susan Shipman Smith
- b. Race: Caucasian
- c. Residence: 123 Normal St., Memphis, TN 38111
- d. Length of residence in Tennessee: 22 years
- e. Date and place of birth: 01/01/1970; Ohio
- f. Number of previous marriages: 0
- g. Member of the Armed Services of the United States: No
- h. Employed: Comcast, Winchester Rd., Memphis, TN

HUSBAND:

- i. Full name of Husband: Steven Scott Smith
- j. Race: Caucasian
- k. Residence address: 456 Normal St., Memphis, TN 38111
- l. Length of residence in Tennessee: 25 years
- m. Date and place of birth: 02/02/1969; Mississippi
- n. Number of previous marriages: 1
- o. Member of the Armed Services of the United States: No

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- p. Employed: FedEx, Airways Blvd., Memphis, TN
- q. Date and place of marriage of the parties: 03/03/2003; Honolulu, HI
- r. Date of separation of the parties: 04/04/2009
- s. Residence of the parties at the time of separation: 123 Normal St., Memphis, TN 38111
- t. Minor children born of this marriage and their dates of birth: Sally Sandra Smith, 05/05/05; and Shelton Sanders Smith, 06/06/06.

III

AVERMENTS

1. The parties' children live and have lived in Shelby County, Tennessee, for the last six (6) months and specifically at the following places within the last five (5) years:
 - a. 123 Normal St., Memphis, TN 38111 (Mother)
 - b. 789 Normal St., Memphis, TN 38111 (Both Parents)
2. Plaintiff has not participated in other litigation concerning the custody of the subject of this custody litigation. Plaintiff does not have information of any other custody proceeding concerning the subject of this custody litigation in any Court of this or any other state. Plaintiff does not know of any person not a party to this proceeding, who has physical custody of the subject of the custody litigation, or claims to have custody, or visitation rights with respect to the subject of this custody litigation.
3. The best interest of the children will be served by awarding said children to the Plaintiff who is a fit and proper person to have custody of said children. In the alternative, Plaintiff requests joint custody of the parties' children.

IV

GROUND

1. Irreconcilable differences have arisen between the parties that will prevent them from living together as husband and wife.

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V

PRAYERS

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that:

1. Upon the hearing of this cause the Plaintiff be awarded a Final Decree of Absolute Divorce from the Defendant.
2. The Court adjust and adjudicate the respective rights and interests of the parties in all jointly owned property and vest title to such property in Plaintiff as alimony in solido, or in the alternative, pursuant to TCA §36-4-21 to the extent the court deems appropriate.
3. The Court approve a Marital Dissolution Agreement if entered into between the parties and amend the pleadings if necessary to comply with the terms of the Marital Dissolution Agreement.
4. Plaintiff be restored to her maiden name of Shipman.
5. Plaintiff be awarded custody of the parties' minor children, child support, attorney's fees and suit expenses for defending the interest of said children, and that said child support be assigned from the Defendant's income.
6. Plaintiff be awarded such other further and general relief to which Plaintiff may prove entitled.

Respectfully Submitted,
Cheetham & Howe Law Firm, PLLC

DEWEY CHEETHAM, BPR #012345
Attorney for Plaintiff
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901.123.4567 tel.
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STATE OF TENNESSEE
COUNTY OF SHELBY

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I, SARAH SUSAN SHIPMAN SMITH, make oath that the facts stated in the foregoing Complaint for Divorce are true to the best of my knowledge and belief; that it is not filed in levity or in collusion, but in sincerity and truth, for the causes mentioned in said bill.

SARAH SUSAN SHIPMAN SMITH

On this the ____ day of _____, 20____, before me, a Notary Public, in and for the aforesaid state and county, personally appeared SARAH SUSAN SHIPMAN SMITH, to me known to be the person described in and who executed the foregoing Complaint for Absolute Divorce, and acknowledged that he/she executed the same as his/her free act and deed.

NOTARY PUBLIC

My Commission Expires: _____

Service of a copy of this Complaint for Absolute Divorce upon the Shelby County Divorce Referee is acknowledged this _____ day of _____, 20_____.

DIVORCE REFEREE