## Michael DeBlis III, Esq.

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# ALICE KRAMDEN,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION: FAMILY PART OCEAN COUNTY

DOCKET NO.: FM-19-000-06

**CIVIL ACTION** 

CERTIFICATION OF ALICE KRAMDEN

v.

## RALPH KRAMDEN,

#### Defendant

### I, ALICE KRAMDEN, of full age, certify as follows:

- 1. I am the plaintiff and make this certification in support of my Notice of Motion for Pendente Lite Relief. The defendant and I were married on June 14, 1999, separated on March 15, 2007 and a Complaint for Divorce was filed on April 26, 2007. We have one child, Trixie, age 5. Trixie lives with me.
- 2. Since Trixie's birth, I have been the primary care taker for her due to my husband's commitment to his work. Quite frankly, he is a workaholic and never had the time to care for Trixie. All of the childbearing tasks have been left to me.
- 3. In December 2006, my husband sexually abandoned me and commenced an adulteress affair with a co-worker.
- 4. I am asking that the Court award me primary residential custody of Trixie. I am willing to work out a visitation schedule so that Trixie can visit her father.
- 5. I have submitted my Case Information Statement and according to my income and my husband's income, I am asking that the Court award me \$300.00 per week in child support.

- 6. I am also asking that the Court direct my husband to maintain all of the medical, optical, hospital, and dental insurance for Trixie Kramden and that he pay 100% of all unreimbursed expenses for both me and Trixie Kramden.
- 7. Because I am working, I ask that my husband pay all of the day care expenses.
- 8. I am a teacher at the Riverside Middle School. During the summer, I work part-time as a waitress at a restaurant. The salary that I earn is barely enough to support myself, let alone my daughter. On the other hand, my husband is an associate at an architectural firm. Since his raise in 2004, he earns almost \$50,000/year which makes him the primary breadwinner in the family. I am asking that the Court award me temporary alimony based upon the budget which I am submitting in my Case Information Statement.
- 9. In March 2007, my husband moved into an apartment at 69 E. New Hampshire Drive in Brick Township. Despite the fact that my husband is no longer living at the marital home, I ask that he be responsible for maintaining the mortgage, real estate taxes, and homeowner's insurance so that we do not lose the house through foreclosure.
- 10. I am also asking that my husband maintain his life insurance policy naming me and Trixie as irrevocable beneficiaries.
- 11. I also ask that he maintain the automobile insurance for my car and be responsible for the car loan and car repairs.
- 12. I am also asking that restraints be entered against my husband so that he does not sell off assets prior to the distribution.
- 13. I have little savings at the present time due to the fact that I have been managing the monthly shelter and living expenses single-handedly since my husband moved out in March. I have been unable to give my attorney a retainer and I ask that I be given \$5,000.00 retainer to prosecute this divorce case. In addition, I ask that I be awarded specific counsel fees in connection with this motion due to my husband's willful refusal to pay me support.
- 14. Lastly, I ask that my husband advance the cost of \$500.00 so that we may retain an expert to evaluate his pension.

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



Dated: April 26, 2007