

**Michael DeBlis III, Esq.**  
6 Highfield Road  
Bloomfield, NJ 07003  
(973) 783-7000  
Attorney for the Plaintiff

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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

**NOTICE OF MOTION FOR  
*PENDENTE LITE RELIEF***

v.

**RALPH KRAMDEN,**

Defendant

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TO: Mark Gruber  
Gruber, Colabella, Liuzza, Kutyla & Ullmann  
43 Lakeside Boulevard  
Hopatcong, NJ 07843

**PLEASE TAKE NOTICE** that on June 23, 2007, at 9:00 o'clock in the morning, or as soon thereafter as counsel may be heard, the undersigned attorney for the plaintiff, **ALICE KRAMDEN**, shall move before the Honorable Judge of the Superior County, Chancery Division, Family Part, Ocean County Justice Complex, 120 Hooper Avenue, Toms River, NJ, for an order as follows:

1. Awarding the plaintiff joint legal custody of the unemancipated child, Trixie Kramden.
2. Granting the plaintiff primary residential custody of the unemancipated child, Trixie Kramden.

3. Directing the defendant to pay \$300.00 child support for Trixie Kramden, payable through the Probation Department in the county where the defendant resides, retroactive to the filing date of this motion.
4. Directing the defendant to maintain the medical, optical, hospital, major medical, dental, drug, and diagnostic insurance presently available through the defendant's employment for the benefit of Trixie Kramden.
5. Directing the defendant to pay 100% of all unreimbursed medical, optical, hospital, major medical, dental, drug, and diagnostic expenses for both the plaintiff and Trixie Kramden.
6. Directing the defendant to pay all daycare expenses.
7. Directing the defendant to pay alimony to the plaintiff, payable through the Probation Department in the county in which the defendant resides. Alimony shall terminate on the death of the payer, death of payee, and shall be taxable to the payee and deductible by the payor.
8. Directing the defendant to pay the mortgage, real estate taxes, and homeowner's insurance on the marital home located at 116 N. Plainfield Avenue, Brick Township, Ocean County, New Jersey.
9. Directing the defendant to maintain the present life insurance available through Northwest Mutual Life in the minimum amount of \$100,000, designating the plaintiff and Trixie Kramden as irrevocable beneficiaries.
10. Directing the defendant to pay the following:
  - a. Automobile insurance for the 2004 Toyota Camry;
  - b. Auto repairs for the 2004 Toyota Camry;
  - c. Car loan to Ocean Credit Union for the 2004 Toyota Camry; and
  - d. All credit card indebtedness.
11. Restraining the defendant from encumbering, disposing, or otherwise dissipating any and all assets which are listed on the parties' case information statements, and any other assets which may be subject to equitable distribution.
12. Directing the defendant to advance the sum of \$5,000 counsel fees payable to Michael De Blis III, Esq. within ten (10) days of the date of this Order as and for the plaintiff's retainer in this action.

13. Directing that the defendant pay to the plaintiff counsel fees in connection with this motion payable to Michael De Blis III, Esq., counsel for the plaintiff, within ten (10) days of the date of this Order.
14. Directing the defendant to pay to the plaintiff \$500.00 for purposes of pension evaluation fees, payable within ten (10) days of the date of this Order.

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the certification of the plaintiff, **ALICE KRAMDEN**.

**PLEASE TAKE FURTHER NOTICE** that the undersigned hereby requests oral argument.

### **NOTICE PURSUANT TO N.J.S.A. 2A:17-56.8**

The child support provision of any order shall, and the medical support provision may, as appropriate, be enforced by an income withholding upon the current or future income due from the obligor's employer or successor employers and upon the unemployment compensation benefits due the obligor except as provided in section 3 of P.L.1981, c.417 (C. 2A:17-56.9). The driver's license and professional or occupational licenses held or applied for the obligor may be denied, suspended or revoked if: (1) the child support arrearage is equal to or exceeds the amount of child support payable for six months; (2) the obligor fails to provide health insurance for the child as ordered by the court for six months; or (3) a warrant for the obligor's arrest has been issued by the court due to failure to pay child support as ordered, failure to appear at a hearing to establish paternity or child support, or failure to appear at a hearing to enforce a child support order and said warrant remains outstanding. The amount of a IV-D child support order and the provisions for medical support coverage shall be reviewed and updated, as necessary, at least every three years.

### **CERTIFICATION OF SERVICE**

I certify that the foregoing was served in the manner and time prescribed by the Rules of Court.

Michael DeBlis III, Esq.  
Attorney for the Plaintiff

By: \_\_\_\_\_  
Michael DeBlis III, Esq.

Dated: April 26, 2007