

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

Jennifer S. Sanford,

FILED IN THE FAMILY COURT

2009 DEC 11 AM 10:31

FAMILY COURT COVERSHEET

Plaintiff(s) JENNIFER STRONG
CLERK OF COURT

09 - DR - 10 - 4904

vs.

BY JNC

Marshall C. Sanford, Jr.,

Defendant(s)

(Please Print)

Submitted By: Deena Smith McRackan

SC Bar #: 3913

Other:

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this cover sheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check one box below if filing in a Mandatory Mediation County)

- This case is subject to **MEDIATION** pursuant to the Family Court Alternative Dispute Resolution Rules.
- This case is exempt from ADR (certificate attached).

NATURE OF ACTION
(Check One Box Below)

Marital Dissolution

- Divorce (110)
- Annulment (120)
- Sep. Support & Maintenance (130)
- Reg. Foreign Decree of Divorce (190)
- Other (199)

Abuse and Neglect

- Child Protective Services (210)
- Adult Protective Services (220)
- Other (299)

Juvenile Delinquency

- Status Offense (310)
- Criminal Offense (320)
- Other (399)

Protection from Domestic Abuse

- Intimate Partner (410)
- Minor (420)
- Reg. Foreign Order (490)
- Other (499)

Support

- Child Support (510)
- DSS Child Support (511)
- Mod of Child Support (515)
- Mod of Alimony (525)
- College Expenses (530)
- Other (599)

Custody/Visitation

- Child Custody/Visitation (610)
- Mod. Of Custody/Visitation (615)
- Reg. Foreign Child Custody Order (690)
- Other (699)

Miscellaneous Actions

- Name Change (710)
- Correction/Birth Record (720)
- Judicial Bypass (730)
- Adoption (740)
- Foreign Adoption (741)
- Post Dissolution Equitable Distribution (750)
- Paternity (760)
- Termination of Parental Rights (770)
- Other (799)

Submitting Party
Signature:

Deena Smith McRackan

Date: 12/11/09

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRPC, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

3 C to DM (HD)

FILED

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN THE FAMILY COURT
FOR THE NINTH JUDICIAL CIRCUIT
09-DR-10-4904

2009 DEC 11 AM 10:51
JULIA STRONG
CLERK OF COURT

Jennifer S. Sanford,

BY JTNC

Plaintiff,)

vs.)

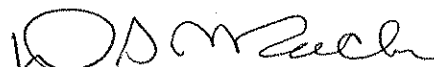
SUMMONS)

Marshall C. Sanford, Jr.,)

Defendant.)

TO: THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in the above captioned matter, a copy of which is herewith served on you, within thirty (30) days after service hereof, exclusive of the day of such service, and to serve a copy of your Answer on the subscriber at her office at [REDACTED] within the said thirty (30) days, and if you fail to answer the Complaint within the time aforesaid, then judgment by default will be rendered against you for the relief demanded in the said Complaint.



Deena Smith McRackan
171 Church Street, Suite 300
Charleston, South Carolina 29401
(843) 723-1004
Attorney for Plaintiff

December 11, 2009

STATE OF SOUTH CAROLINA) FILED) IN THE FAMILY COURT
COUNTY OF CHARLESTON) 2009 DEC 1) AM 09-DR-10-4904)
FOR THE NINTH JUDICIAL CIRCUIT

Jennifer S. Sanford,

JULIA SIMSTRONG
CLERK OF COURT

Plaintiff,

TNC

vs.

COMPLAINT

Marshall C. Sanford, Jr.,

Defendant.

YOUR PLAINTIFF would respectfully show unto the Court:

1. That the parties are residents of Charleston County, South Carolina and have been so for more than three months prior to the commencement of this action.

2. That the parties are husband and wife having been married in Martin County, Florida on November 4, 1989.

3. That of this marriage, four children have been born, to wit: Marshall, born June 23, 1992, Landon, born September 28, 1993, Bolton, born February 2, 1996, and Blake, born October 5, 1998.

4. That the Defendant has engaged in a sexual relationship with a woman other than Plaintiff. Plaintiff has not condoned that relationship and is informed and believes that she is entitled to a divorce, a vinculo matrimonii, from the Defendant on the grounds of adultery.


5. Plaintiff is informed and believes that all other matters between the parties will be resolved by agreement, which agreement will be presented to the court for approval and adoption as controlling those matters.

WHEREFORE, Plaintiff prays:

1. For a decree of divorce, a vinculo matrimonii, from Defendant on the grounds of adultery.

2. That the court approve and adopt the agreement of the parties, to be submitted, as to all other matters between the parties.

3. For such other and further relief as the Court may deem just and proper.



Deena Smith McRackan
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December 11, 2009