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SUPERIOR COURT OF NEW JERSEY
COUNTY OF BERGEN
FINANCE DIVISION

DATE FILED 12/23/14
PAYMENT # 92758
CA CK CC MO CG
AMOUNT 8325
PAYOR
BATCH/REF/CASE#

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CHRISTOPHER ROCK,)	SUPERIOR COURT OF NEW JERSEY
)	CHANCERY DIVISION-FAMILY PART
Plaintiff,)	BERGEN COUNTY
)	Docket No. FM-02-1418-15
v.)	
MALAAK D. COMPTON-ROCK,)	Civil Action
)	
Defendant.)	COMPLAINT FOR CUSTODY OF
)	CHILDREN AND FOR DIVORCE
)	

Plaintiff, Christopher Rock, resident at [REDACTED]
[REDACTED] in the Borough of Alpine, County of Bergen, and State of
New Jersey, by way of Complaint against the Defendant, Malaak D.
Compton-Rock, states:

COUNT ONE
(Custody)

1. The parties hereto were married on November 23, 1996,
and said marriage still exists.

2. Defendant currently resides [REDACTED] Borough of Alpine, County of Bergen, and State of New Jersey.

3. At the time the within cause of action arose, Plaintiff resided [REDACTED] Borough of Alpine, County of Bergen, and State of New Jersey.

4. Two children were born of the marriage, [REDACTED] [REDACTED] and [REDACTED] [REDACTED]

5. It is in the best interests of [REDACTED] and [REDACTED] that they be in the joint and equal physical and legal custody of Plaintiff and Defendant herein, and that they be permitted to spend equal amounts of time with each parent.

6. Plaintiff is now and always has been a fully involved and participating parent in all aspects of the lives of these children and it is in their best interests for the parties to have joint custody and to equally share residential custody. Notwithstanding that the parties have been separated, Defendant has repeatedly refused to permit Plaintiff normal and usual access to the children, and has acted in a manner detrimental to the children's best interests. Defendant's conduct as aforesaid

will be further disclosed by continuing discovery and is directly contrary to the best interests of the children.

WHEREFORE, Plaintiff demands judgment as follows:

A. For equal legal and physical care, custody, and control of [REDACTED] and [REDACTED] in the best interests of the children;

B. For all other relief set forth in Count Two of this Complaint;

C. For counsel fees and costs; and

D. For such other relief as the Court may deem equitable and just.

COUNT TWO
(Divorce)

1. Plaintiff repeats and re-alleges each and every allegation of the First Count hereof as if the same were set forth at length herein.

2. Plaintiff was a bona fide resident of the State of New Jersey, County of Bergen, when this cause of action arose and has ever since and for more than one year next preceding the commencement of this action continued to be such a bona fide resident.

3. Defendant resides [REDACTED] Borough of Alpine, County of Bergen, New Jersey. Both parties were residents of Bergen County at the time the cause of action for divorce as set forth herein arose.

4. Irreconcilable differences between the parties have caused the breakdown of their marriage for a period of six or more consecutive months which has continued to date as outlined in N.J.S.A. 2A:34-2(i) and requires that the marriage be dissolved. There is no reasonable prospect of reconciliation.

5. At the time the within cause of action arose, Plaintiff resided [REDACTED] Borough of Alpine, County of Bergen, and State of New Jersey.

6. The parties hereto previously entered into a Premarital Agreement which Agreement contained a sunset provision that has become effective.

7. Certain property was legally and beneficially acquired by the parties during the marriage, and Plaintiff demands equitable distribution of same. Certain property is exempt from equitable distribution and is exempt from distribution between the parties. By agreement of the Parties, dated November 7, 2014, the identification and valuation of assets and liabilities subject to equitable distribution is to be effected as of

October 1, 2014. A copy of said Agreement is attached hereto as Exhibit "A".

8. Defendant has the ability to work and contribute to her own support, as well as the support and other financial needs of the children.

9. There have been no prior proceedings between the parties respecting the marriage, its dissolution, or the support of either party or the children in any Court.

WHEREFORE, Plaintiff demands judgment as follows:

- A. Dissolving the marriage between the parties;
- B. Equitably distributing all property, both real and personal which was legally and beneficially acquired by the parties during the marriage, and reserving to each individual party any property which is exempt from equitable distribution according to law.
- C. For all relief set forth in Count One of this Complaint for custody and divorce;
- D. For an Order requiring that the parties each contribute a suitable and proper amount as and for the support of the children;
- E. For counsel fees and costs; and

F. For such other relief as the Court may deem equitable and just.

EINHORN, HARRIS, ASCHER,
BARBARITO & FROST, P.C.
Attorneys for Plaintiff

By: 

STEPHEN P. HALLER

Dated: December 22, 2014

CERTIFICATION PURSUANT TO R. 4:5-1

I hereby certify that to the best of my knowledge, there exists no other action pending in any Court or in arbitration concerning this action and that no other action is contemplated.

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

EINHORN, HARRIS, ASCHER,
BARBARITO & FROST, P.C.
Attorneys for Plaintiff

By: 

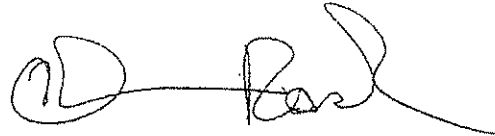
STEPHEN P. HALLER

Dated: December 22, 2014

CERTIFICATION OF VERIFICATION AND NON-COLLUSION
PURSUANT TO R. 5:4-2 AND CERTIFICATION
PURSUANT TO RULE 4:5-1

I am the Plaintiff in the foregoing Complaint. The allegations of the Complaint are true to my knowledge, information and belief. The said Complaint is made in truth and good faith and without collusion for the causes set forth therein.

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



CHRISTOPHER ROCK

Dated: December 20, 2014