

**COSNER COSNER
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ALAN G. COSNER
STACI A. COSNER *
MARC D. YOUNGELSON *
RUSSELL L. FRANK **

WARREN OFFICE
27 MOUNTAIN BLVD.
WARREN, NJ 07059
(908) 769-9400
REPLY TO EAST BRUNSWICK

* ADMITTED N.J. & N.Y.
** ADMITTED N.J. & AZ.

File No. CC486

August 23, 2010

Dissolution Unit
Superior Court of New Jersey
Middlesex County Courthouse
Chancery Division – Family Part
120 New Street
New Brunswick, N.J. 08903

Re: Repmann v. Ross

Dear Sir or Madam:

Enclosed please find an original and two copies of a Complaint for Divorce, along with a Certification by Attorney, Certification of Litigant, Certification and Verification of Non-Collusion, Affidavit of Insurance Coverage and Confidential Litigant Information Sheet.

I have enclosed a check in the amount of \$275.00 representing the filing fee. Kindly file the pleadings accordingly and return a copy stamped "Filed" to our office in the envelope provided.

If you have any questions regarding the above captioned matter, please do not hesitate to contact our office.

Thank you in advance.

Very truly yours,



ALAN G. COSNER

AGC/jb

Enclosures

cc: Maureen Lea Repmann

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2010 AUG 30 P 12:54
FAMILY DIVISION
MIDDLESEX VICINAC

The Honorable Barry A. Weisberg, J.S.C.
New Jersey Superior Court, Family Part
120 New Street
New Brunswick, New Jersey 08901
(732) 519-3132

FILED

JUN 03 2011

Judge Barry A. Weisberg

MARC ROSS,	:	SUPERIOR COURT OF NEW JERSEY
<i>Plaintiff,</i>	:	CHANCERY DIVISION - FAMILY PART
	:	MIDDLESEX COUNTY
v.	:	DOCKET No.: FM-12-442-11-E
MAUREEN REPMANN-ROSS,	:	CIVIL ACTION
<i>Defendant.</i>	:	ORDER

THIS MATTER having been opened to the Court on Friday, June 3, 2011, on a Notice of Motion filed by Alan G. Cosner, Esq., counsel for Defendant, Maureen Repmann-Ross, and a certification filed by Donald Schumacher, Esq., counsel for Plaintiff, Marc Ross, and the Court having considered the papers submitted, and Marc D. Youngelson, Esq., on behalf of Cosner Youngelson, Mr. Schumacher, and Ms. Repmann-Ross having appeared for oral argument, and good cause having been shown,

IT IS on this 3rd day of June 2011,

ORDERED as follows:

1. Defendant's counsel's motion to be relieved as Defendant's counsel is GRANTED.
2. This matter is scheduled for trial on August 1, 2011 at 9:00 A.M. There will be no further adjournments.
3. Any requested relief not specifically addressed in this Order is DENIED.
4. A copy of this Order shall be served upon all parties within seven (7) days.



HONORABLE BARRY A. WEISBERG, J.S.C.

ALAN G. COSNER, ESQ.
COSNER COSNER & YOUNGELSON
197 Highway 18, Suite 308
EAST BRUNSWICK, NJ 08816
(732) 937-8000
ATTORNEY FOR Plaintiff

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PAYOR	PLN PLN ATTY
	DEF DEF ATTY
OTHER (NAME)	
CK/CHG ACCT #	
AMOUNT (\$)	
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AUG 30 12:59
FAMILY DIVISION
MIDDLESEX VICINAGE

MAUREEN LEA REPMANN,

Plaintiff,

vs.

MARC B. ROSS,

Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - FAMILY PART
MIDDLESEX COUNTY

DOCKET NO.:

CIVIL ACTION

COMPLAINT FOR DIVORCE

Plaintiff, Maureen Lea Repmann, residing at 506 Prospect Avenue, Laurence Harbor, County of Middlesex, State of New Jersey, says:

1. She was lawfully married to Marc B. Ross, the Defendant herein, on the 13th day of November 1999, in the State of New Jersey, in a religious ceremony.

2. She was a bona fide resident of the State of New Jersey 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 bona fide resident.

3. The Defendant, Marc B. Ross, resides at 302 Main Street, South Amboy, State of Jersey.

4. Irreconcilable differences have occurred which have caused the breakdown of the marriage for a period of six months and which make it appear that the marriage should be dissolved and that there is no reasonable prospect of reconciliation.

5. Plaintiff alleges that Defendant committed adultery with one Paula Roby of Cedar Rapids, Iowa, for an extensive period of time while he was working in Iowa.

5. One child has been born of the marriage; namely, Jacob Ross, date of birth February 25, 2002, age 8.

6. There have been no previous matrimonial actions between the parties.

7. Property, real and/or personal, was legally and beneficially acquired by the parties, or either of them, during the marriage.

WHEREFORE, Plaintiff demands judgment:

- A. Dissolving the marriage between the parties;
- B. Equitably distributing property, both real and personal, which was legally and beneficially acquired by them or either of them during the marriage;
- C. Granting sole custody of the child, Jacob Ross.
- D. Granting child support for the child, Jacob Ross.
- E. Granting spousal support for the Plaintiff.
- F. Compelling the Defendant to pay Plaintiff's counsel fees and costs;
- G. For such further relief as the Court may deem just and equitable.



ALAN G. COSNER
Attorney for Plaintiff

DATED: August 23, 2010

WEINSTEIN LINDEMANN & WEINSTEIN
A Professional Corporation
101 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 403-6000
Attorneys for Plaintiff

MARC ROSS,

Plaintiff,

v.

MAUREEN REPMANN-ROSS,

Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART
MIDDLESEX COUNTY
DOCKET NO. FM-12-442-11E

CIVIL ACTION

SUMMONS

FAMILY

The State of New Jersey to the Above Named Defendant:

MAUREEN REPMANN-ROSS

YOU ARE HEREBY SUMMONED in a Civil Action in the Superior Court of New Jersey, instituted by the above named Plaintiff and required to serve upon the attorney(s) for the Plaintiff, whose name and office address appears above, either (1) an Answer to the annexed Complaint or (2) a general Appearance in accordance with R.5:4-3(a), within 35 days after the service of the Summons and Complaint upon you, exclusive of the day of service. If you fail to answer, or fail to file a general Appearance in accordance with R.5:4-3(a), Judgment by Default may be rendered against you for the relief demanded in the Complaint. You shall promptly file your Answer or your general Appearance and Proof of Service thereof in duplicate with the Deputy Clerk of the Superior Court in the county in which this matter is venued, in accordance with the rules of civil practice and procedure.

If you cannot afford to pay an attorney, call a Legal Services Office. An individual not eligible for free legal assistance may obtain a referral to an attorney by calling a county lawyer referral service. The phone numbers for the county in which this action is pending are: Lawyer Referral Service, (732) 828-0053, Legal Services Office (732) 249-7600.

Dated: September 8, 2010

/s/ Jennifer M. Perez
Jennifer M. Perez, Clerk of the Superior Court

Name of Defendant to be served:
Address for service:

MAUREEN REPMANN-ROSS
c/o Alan G. Cosner, Esq.
Cosner, Cosner & Youngelson
197 Highway 18, Suite 308
East Brunswick, NJ 08816

WEINSTEIN LINDEMANN & WEINSTEIN
A Professional Corporation
101 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 403-6000
Attorneys for Plaintiff

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2010 AUG 19 A 11:49
FAMILY DIVISION
MIDDLESEX VICINAGE

MARC ROSS,
Plaintiff

v.

MAUREEN REPMANN-ROSS,
Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART
MIDDLESEX COUNTY
DOCKET NO. FM-12-442-11E

Civil Action

COMPLAINT FOR DIVORCE

The Plaintiff, Marc Ross, residing at 302 Main Street, in the City of South Amboy, County of Middlesex, and State of New Jersey, by way of Complaint against the Defendant, Maureen Repmann-Ross, says:

1. The Plaintiff was lawfully married to the Defendant on the 13th day of November, 1999, in the City of South Amboy, County of Middlesex, State of New Jersey, in a religious ceremony.

2. The Plaintiff was a *bona fide* resident of the State of New Jersey, residing at 302 Main Street, in the City of South Amboy, County of Middlesex, and State of New Jersey, 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. The Defendant resided at 376 Prospect Street, in the City of South Amboy, County of Middlesex, and State of New Jersey, at the time the cause of action arose.

4. The Plaintiff and Defendant have experienced irreconcilable differences for a period of more than six months, which has caused the breakdown of their marriage. The marriage of the parties should be dissolved because there is no reasonable prospect of reconciliation.

5. There was one child born of the marriage, Jacob Harrison Ross, born February 25, 2002.

6. During the marriage between the parties, the Plaintiff and Defendant have acquired assets which are subject to equitable distribution, pursuant to N.J.S.A. 2A:34-23.1.

7. The Defendant has the ability to work and earn a sufficient income to support herself and contribute toward the expenses of the unemancipated child of the parties.

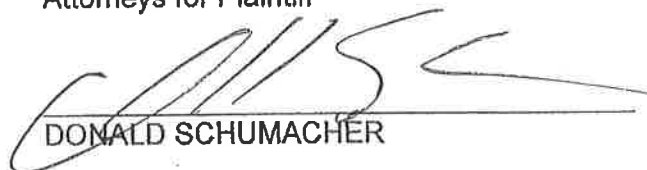
8. There have been no previous proceedings between the Plaintiff and Defendant respecting the marriage or its dissolution or respecting the maintenance of the Plaintiff or the minor children in any court in any jurisdiction.

WHEREFORE, the Plaintiff demands judgment as follows:

- A. Dissolving the marriage between the parties;
- B. Awarding joint custody to the Plaintiff and the Defendant;
- C. Compelling the Defendant to contribute toward the support the minor child of the marriage;
- D. Equitably distributing all properties, both real and personal, acquired by the Plaintiff, the Defendant, and the Plaintiff and Defendant jointly, during the marriage;
- E. Awarding counsel fees and expert fees to the Plaintiff;
- F. Granting injunctive relief; and

G. Granting such other relief as this Court deems equitable and just.

WEINSTEIN LINDEMANN & WEINSTEIN
A Professional Corporation
Attorneys for Plaintiff



DONALD SCHUMACHER

August
DATED: ~~July~~ 17, 2010

TRIAL COUNSEL

Donald Schumacher is hereby designated as trial counsel in this matter.

WEINSTEIN LINDEMANN & WEINSTEIN
A Professional Corporation
Attorneys for Plaintiff


DONALD SCHUMACHER

August
DATED: ~~July~~ 17, 2010

CERTIFICATION

DONALD SCHUMACHER, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and a member of the firm of Weinstein Lindemann & Weinstein, A Professional Corporation, attorneys for the Plaintiff.

2. Based upon my knowledge and belief, this matter in controversy is not the subject of any other action in the Superior Court of New Jersey and there is no other party who should be joined in this proceeding.

I hereby 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.

August
DATED: ~~July~~ 7, 2010


DONALD SCHUMACHER

CERTIFICATION OF NOTIFICATION OF COMPLEMENTARY DISPUTE
RESOLUTION ALTERNATIVES PURSUANT TO RULE 5:4-2(h)

DONALD SCHUMACHER, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and member of the firm of Weinstein Lindemann & Weinstein, A Professional Corporation, attorneys for the Plaintiff.

2. I am making this Certification pursuant to New Jersey Court Rule 5:4-2(h).

3. I have provided the Plaintiff with a copy of the document entitled "Divorce -- Dispute Resolution Alternatives to Conventional Litigation".

4. I have discussed with the Plaintiff the complimentary dispute resolution alternatives to litigation contained in that document.

I hereby 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.


DONALD SCHUMACHER

Agot
DATED: July 17, 2010

CERTIFICATION OF VERIFICATION AND NONCOLLUSION

I, MARC ROSS, of full age, certify as follows:

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

I hereby 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.



MARC ROSS

DATED: July 29, 2010

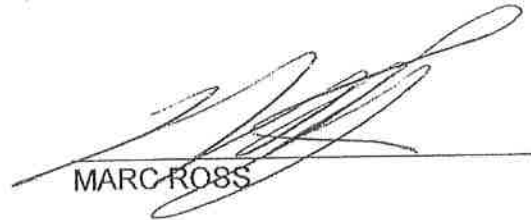
**CERTIFICATION OF NOTIFICATION OF
COMPLEMENTARY DISPUTE RESOLUTION**

MARC ROSS, of full age, hereby certifies as follows:

1. I have been informed of the availability of Complementary Dispute Resolution (CDR) alternatives to conventional litigation, including, but not limited to, mediation and arbitration, that might assist me in the resolution of my matrimonial dispute.

2. I have received descriptive literature regarding such Complementary Dispute Resolution alternatives from my attorney.

I hereby 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.


MARC ROSS

DATED: July 27, 2010

ALAN G. COSNER, ESQ.
COSNER COSNER & YOUNGELSON
197 Highway 18, Suite 308
EAST BRUNSWICK, NJ 08816
(732) 937-8000
ATTORNEY FOR Plaintiff

MARC ROSS,

Plaintiff,

vs.

MAUREEN REPMANN-ROSS,

Defendant, Counter-Claimant

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - FAMILY PART
MIDDLESEX COUNTY

DOCKET NO.: FM-12-442-11E

CIVIL ACTION

ANSWER and COUNTERCLAIM

ANSWER

Plaintiff, Maureen Lea Repmann, residing at 376 Prospect Street, South Amboy, County of Middlesex, State of New Jersey, says:

1. The allegations in the Complaint are admitted except for ¶ (7); Defendant does not have the ability to work.

COUNTERCLAIM

1. She was lawfully married to Marc B. Ross, the Defendant herein, on the 13th day of November 1999, in the State of New Jersey, in a religious ceremony.

2. She was a bona fide resident of the State of New Jersey 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 bona fide resident.

3. Irreconcilable differences have occurred which have caused the breakdown of the marriage for a period of six months and which make it appear that the marriage should be dissolved and that there is no reasonable prospect of reconciliation.

4. Plaintiff alleges that Defendant committed adultery with one Paula Roby of Cedar Rapids, Iowa, for an extensive period of time while he was working in Iowa.

5. Defendant also abandoned his wife and child in November of 2009 by leaving the household premises and failing to provide financial support.

6. One child has been born of the marriage; namely, Jacob Ross, date of birth February 25, 2002, age 8.

7. Property, real and/or personal, was legally and beneficially acquired by the parties, or either of them, during the marriage.

WHEREFORE, Plaintiff demands judgment:

- A. Dissolving the marriage between the parties;
- B. Equitably distributing property, both real and personal, which was legally and beneficially acquired by them or either of them during the marriage;
- C. Granting sole custody of the child, Jacob Ross.
- D. Granting child support for the child, Jacob Ross.
- E. Granting spousal support for the Plaintiff.
- F. Compelling the Defendant to pay Plaintiff's counsel fees and costs;
- G. For such further relief as the Court may deem just and equitable.



ALAN G. COSNER
Attorney for Plaintiff, Counter-Claimant

DATED: 9/14, 2010

ALAN G. COSNER, ESQ.
COSNER COSNER & YOUNGELSON
197 Highway 18, Suite 308
EAST BRUNSWICK, NJ 08816
(732) 937-8000
ATTORNEY FOR Plaintiff

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FAMILY DIVISION
MIDDLESEX VICINAGE

MARC ROSS,

Plaintiff,

vs.

MAUREEN REPMANN-ROSS,

Defendant, Counter-Claimant

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - FAMILY PART
MIDDLESEX COUNTY

DOCKET NO.: FM-12-442-11E

CIVIL ACTION

AMENDED

ANSWER and COUNTERCLAIM

ANSWER

Plaintiff, Maureen Lea Repmann, residing at 376 Prospect Street, South Amboy, County of Middlesex, State of New Jersey, says:

1. The allegations in the Complaint are admitted except for ¶ (7); Defendant does not have the ability to work.

COUNTERCLAIM

1. She was lawfully married to Marc B. Ross, the Defendant herein, on the 13th day of November 1999, in the State of New Jersey, in a religious ceremony.

2. She was a bona fide resident of the State of New Jersey 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 bona fide resident.

3. Irreconcilable differences have occurred which have caused the breakdown of the marriage for a period of six months and which make it appear that the marriage should be dissolved and that there is no reasonable prospect of reconciliation.

4. Plaintiff alleges that Defendant committed adultery for an extensive period of time during the marriage.

5. Defendant also abandoned his wife and child in November of 2009 by leaving the household premises and failing to provide financial support.

6. One child has been born of the marriage; namely, Jacob Ross, date of birth February 25, 2002, age 8.

7. Property, real and/or personal, was legally and beneficially acquired by the parties, or either of them, during the marriage.

WHEREFORE, Plaintiff demands judgment:

- A. Dissolving the marriage between the parties;
- B. Equitably distributing property, both real and personal, which was legally and beneficially acquired by them or either of them during the marriage;
- C. Granting sole custody of the child, Jacob Ross.
- D. Granting child support for the child, Jacob Ross.
- E. Granting spousal support for the Plaintiff.
- F. Compelling the Defendant to pay Plaintiff's counsel fees and costs;
- G. For such further relief as the Court may deem just and equitable.



ALAN G. COSNER
Attorney for Plaintiff, Counter-Claimant

DATED: 11/11, 2010

WEINSTEIN LINDEMANN & WEINSTEIN
A Professional Corporation
101 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 403-6000
Attorneys for Plaintiff

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2010-12-07 PM 12:57
MIDDLESEX VICINAGE

MARC ROSS,
Plaintiff,

v.

MAUREEN REPMANN-ROSS,
Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, FAMILY PART
MIDDLESEX COUNTY
DOCKET NO. FM-12-442-11E

Civil Action

ANSWER TO COUNTERCLAIM

The Plaintiff, MARC ROSS, residing at 302 Main Street, in the City of South Amboy, County of Middlesex, and State of New Jersey, by way of Answer to the Counterclaim of the Defendant, MAUREEN REPMANN-ROSS, says:

1. The Plaintiff admits the allegations contained in paragraphs 1, 2, and 6 of the Counterclaim.
2. The Plaintiff denies the allegations contained in paragraph 5 of the Counterclaim.
3. The Plaintiff neither admits nor denies the allegations contained in paragraphs 3, 4, and 7 of the Counterclaim, and leaves Defendant to her proofs thereon.

WHEREFORE, the Plaintiff demands Judgment dismissing the Counterclaim of the Defendant.

WEINSTEIN LINDEMANN & WEINSTEIN
A Professional Corporation
Attorneys for Plaintiff


DONALD SCHUMACHER

DATED: December 7, 2010