

COMMONWEALTH OF MASSACHUSETTS

PROBATE COURT

No. 98308

Suffolk
Commonwealth of Massachusetts

ss. Department of Public Welfare of Norwood in the name of
Nancy J. Pond Plaintiff

v.

Complaint for Contempt

FILED JUL 27 1978

Richard A. Pond Defendant

1) Plaintiff, who resides at 24 Concord Ave., Norwood Norfolk County
was - ~~is~~ - the spouse of defendant, who now resides at 933 Metropolitan Ave., Hyde Park
Suffolk County

- 2) By judgment - ~~order~~ - of the court, dated January 6, 1978, defendant was ordered:
- to pay ~~alimony~~ - support of minor children - in the sum of \$40 forthwith and the further sum of \$40 weekly - ~~monthly~~ - thereafter to Department of Public Welfare
 - to grant plaintiff visitation rights with _____
 - not to impose any restraint on the personal liberty of plaintiff
 - to pay reasonable medical and dental expenses
 - to pay medical insurance for children

and said judgment - ~~order~~ - is still in force.

- 3) Defendant has not obeyed that judgment - ~~order~~ - and
- there now remains due and unpaid to plaintiff the sum of \$1920 plus such further amounts as may accrue to the date of hearing
 - plaintiff has been denied visitation rights on _____
 - has violated the order on February 17, 1978 and the following weeks _____ by failing to pay \$40 weekly each and every week, and also has violated a prior order of the Court of \$55 per week dated 12/9/76 on which there is an outstanding arrearage of \$1030 for a total arrearage of \$1920

4) Wherefore, plaintiff demands that defendant be required to appear before this Court to show cause why he should not be adjudged in contempt of Court and for such other relief as to said Court may seem meet and just.

Dated: July 13, 1978

Name: Fred Gross
Address: Mass Dept of Public Welfare
Phone: 329-1030
In the name of Nancy J. Pond