

COMMONWEALTH OF MASSACHUSETTS
MASSACHUSETTS DEPARTMENT OF PUBLIC WELFARE
IN THE NAME OF:

18
PROBATE COURT
No. 98308

SUFFOLK ss.

Nancy J. Pond Plaintiff

v.

Complaint for Contempt

Richard A. Pond Defendant

1) Plaintiff, who resides at 24 Concord Avenue, Norwood, Massachusetts 02062
was the spouse of defendant, who now resides at 933 Metropolitan Avenue, Hyde Park, Massachusetts 02136.

2) By judgment of the court, dated January 6, 1978, defendant was ordered: to pay support of minor children - in the sum of \$40.00 forthwith and the further sum of \$40.00 weekly thereafter
 payments to be made to the Department of Public Welfare

not to impose any restraint on the personal liberty of plaintiff

to pay reasonable medical and dental expenses

to maintain medical insurance for the minor children

and said judgment is still in force.

3) Defendant has not obeyed that judgment and
 there now remains due and unpaid to plaintiff the sum of \$3,371.00 plus such further amounts as may accrue to the date of hearing
 plaintiff has been denied visitation rights on

has violated the order by failing to pay \$40.00 each and every week, but has paid \$1,869.00; by failing to maintain medical insurance.

Plaintiff also requests that the defendant be ordered to assign his wages to satisfy the court order.

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: 7-16-80

Name: Elin H. Graydon c/o Hoban

Address: MASS. DEPT. OF WELFARE

Phone: CHILD SUPPORT UNIT

600 WASHINGTON STREET - Rm. 652
BOSTON, MASS. 02111
727-7820