

KRISTIE LYNN EBBERS
VS.
BERNARD JOHN EBBERS

FILED
THIS DATE
APR 15 2008
ARTHUR JOHNSTON, CHANCERY CLERK
BY *Arthur Johnston* D.C.

PLAINTIFF
CIVIL ACTION NO. 2008-369-B
DEFENDANT

COMPLAINT FOR DIVORCE

COMES NOW the Plaintiff, Kristie Lynn Ebbers ("Kristie") and files this *Complaint for Divorce* against the Defendant, Bernard John Ebbers ("Bernie"), pursuant to MISS. CODE ANN. §93-5-1 and §93-5-2 (1972), and would respectfully show unto this Court the following:

1.

Kristie is an adult resident citizen of Madison County, Mississippi, and resides at 143 Oakhurst Trail, Ridgeland, Mississippi. Bernie is an adult resident citizen of Allen Parish, Louisiana, where he is incarcerated at Federal Correctional Institution in Oakdale, Louisiana. Bernie may be served with process at 1507 East Whatley Road, Oakdale, Louisiana 71463.

2.

The parties are husband and wife and were lawfully married on March 26, 1999. No children were born to this marriage and no other children are expected.

3.

The parties separated in Madison County, Mississippi on or September 26, 2006.

4.

Kristie would show that she is entitled to an absolute divorce, pursuant to MISS. CODE ANN. §93-5-1 (Rev. 1994), on the ground of Bernie's having been sentenced to and now being currently confined in the FCI Oakdale, Federal Correctional Institution, Oakdale, Louisiana.

5.

Bernie was convicted of a felony on March 15, 2005, and sentenced to a penitentiary on July 13, 2005, by the United States District Court for the Southern District of New York. Bernie was not pardoned before entering prison on September 26, 2006.

6.

Kristie would show that the irreconcilable differences between her and Bernie constitute an alternative ground for divorce pursuant to MISS. CODE ANN. §93-5-2 (Supp. 1995).

7.

To the extent there is marital property, Kristie requests that the Court consider the circumstances surrounding this action and make an award of property to Kristie that is equitable.

WHEREFORE, PREMISES CONSIDERED, Kristie prays that her *Complaint for Divorce* be received and filed; that process issue for Bernie in the manner as required by law, requiring Bernie to plead, answer or otherwise respond to this *Complaint*; and upon a final hearing hereon that this Court award unto Kristie a final, complete and absolute divorce of and from Bernie, thereby severing the bonds of matrimony heretofore holding the parties together as husband and wife and awarding unto Kristie property accumulated during the marriage that is equitable under the facts and circumstances of this action.

If Kristie has prayed for wrong, improper, or insufficient relief, then she prays for such other relief, either general or special, to which she may be entitled in the premises.

RESPECTFULLY SUBMITTED,

Kristie Lynn EBBERS

KRISTIE LYNN EBBERS



WILLIAM R. WRIGHT (MS Bar #07404)
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