

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

-----X
ELLEN P. SURLAK, :
 :
 Plaintiff, :
 :
 -against- :
 :
 JOSEPH E. SURLAK, :
 :
 Defendant. :
-----X

VERIFIED
COMPLAINT
Index No.

The plaintiff, by her attorneys, WEKSTEIN & FULFREE, complain-
ing of the defendant, herein alleges and avers:

ADMIT FIRST: That the plaintiff and defendant are both resi-
dents of the City of Yonkers, County of Westchester and State of New York
and have been at all the times hereinafter mentioned.

ADMIT SECOND: Plaintiff and defendant were married in the City
of Yonkers on or about September 19, 1959.

ADMIT THIRD: On or about the 22nd day of May, 1973, plaintiff
and defendant were living separate and apart, and a Separation Agreement
in writing was duly entered into between them, whereby the parties agreed
to live separately and the defendant agreed to pay the plaintiff \$600.00
monthly on the first of every month beginning with June 1, 1973, as more
fully appears from the written Agreement, a copy of which is annexed
hereto and marked Exhibit "A".

FOURTH: The defendant duly paid the plaintiff the sum of

6/1/79

\$600.00 per month each and every month up to and including September 1, 1978 but has not paid the sum of \$600.00 for the months of October, November and December, 1978 and January, February and March, 1979.

FIFTH: That the defendant has failed and refused to pay the plaintiff the full installment agreed upon in the Agreement marked as Exhibit "A" hereto although the same has been duly demanded.

SIXTH: That there is due and owing for the months of October, November and December, 1978 and January, February and March, 1979 the total sum of \$3,600.00.

WHEREFORE, plaintiff demands judgment in the sum of \$3,600.00 with interest from October 1, 1978, together with costs and disbursements of this action.

WEKSTEIN & FULFREE
Attorneys for Plaintiff
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