

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court Department

Plymouth Division

Docket No: _____

Complaint to Establish Paternity
Pursuant to G.L. Chapter 215, Section 6

_____, Plaintiff

v.

_____, and

_____, Defendants

1. Now comes the plaintiff in this action and seeks to establish that he is the biological father of the child named herein.

Plaintiff, who resides at _____
(Street Address)

_____, (City or Town) _____ (County) _____ (State) _____ (Zip) alleges that he is the biological
father of _____ (Child's name) who was born on _____ (Child's date of birth).

2. The Defendant-mother of said child resides at: _____
(Street Address)

_____, (City or Town) _____ (County) _____ (State) _____ (Zip)

3. The Defendant-presumed father of said child resides at: _____
(Street Address)

_____, (City or Town) _____ (County) _____ (State) _____ (Zip)

At the time of the child's birth and/or within three hundred days before the birth of said child, the defendant-presumed father was married to the defendant-mother.

4. The Plaintiff and the defendant-mother are not currently married to each other nor were they married at the time of the child's birth or within three hundred days before the birth of said child.

5. The Plaintiff _____ listed as the father of the child on the birth certificate.
(is - is not)

6. The Plaintiff and said child have established a substantial parent-child relationship as evidenced by:

and plaintiff is interested in continuing his relationship with said child.

7. Plaintiff and his minor child are being deprived of the benefits of said relationship.

8. Wherefore, plaintiff requests that this Court hold a preliminary hearing to determine the extent of the relationship between the plaintiff and the child: Thereafter plaintiff requests that the Court:

- adjudicate the plaintiff to be the father of said child.
- order a suitable amount of support for said child.
- order the plaintiff to maintain/provide health insurance for the benefit of the child.
- prohibit the defendant(s) _____
_____ from imposing any restraint on the personal liberty of the plaintiff.
- grant the plaintiff custody of the child.
- grant the plaintiff visitation rights with the child.
- order the City - Town Clerk to amend the birth record of the child to add the name of the plaintiff as the father.
- _____

Date _____

(Signature of Attorney)

(Plaintiff's signature, if pro se)

(Print Name)

Address _____

Telephone No: _____ BBO # _____

INSTRUCTIONS

Refer to M.G.L. Chapter 215, Section 6.

If a party is represented by an attorney, the attorney is required to sign the complaint.

A certified copy of the child's birth certificate is required to be filed with this complaint, if obtainable.

The Domestic Relations Summons shall issue according to paternity notice procedures.

An Affidavit Disclosing Care and Custody shall be filed with this complaint.