

HARDIN COUNTY COMMON PLEAS COURT

James Somerville

Plaintiff(s)

vs

SUMMONS RULE (4)

Jessica Anderson
Address Unknown

Case No: 20253151DRB

Defendant(s)

To the above named Defendant:

You are hereby summoned that a complaint (copy of which is hereto attached and made a part hereof) has been filed against you in this court by the Plaintiff named herein.

You are required to serve upon the Plaintiff's attorney or upon the Plaintiff if (he/she) has no attorney of record, a copy of your answer to the complaint within twenty-eight (28) days after the service of this summons upon you, exclusive of the date of service. Said answer must be filed with this Court within three (3) days after service on the Plaintiff's attorney.

The name and address of the Plaintiff's attorney is as follows:

Liannie G Parahoo
ONU Legal Clinic
121 W High St
Lima, Oh 45801

If you fail to appear and defend, judgment by default will be taken against you for the relief demanded in the complaint.

Stefani C. Epling
Clerk of Courts

Kathleen M. Lingo
Deputy Clerk



**IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

JAMES SOMERVILLE)	CASE NO. : 20253151DRB
Address Confidential)	
)	
Plaintiff,)	JUDGE: M. SANTO
)	
v.)	
)	
JESSICA ANDERSON)	PLAINTIFF'S COMPLAINT
Address Unknown)	FOR DIVORCE WITHOUT CHILDREN
)	
Defendant.)	

James Somerville, by and through his legal counsel, Liannie Parahoo and Certified Legal Intern, Grace Erwin, and herewith for his Complaint for Divorce Without Children states as follows:

1. Plaintiff has been a resident of the State of Ohio for at least six (6) months immediately preceding the filing of this Complaint.
2. Plaintiff currently resides in Hardin County where this Complaint is filed, and has resided there for greater than six (6) months immediately before filing this Complaint.
3. Plaintiff and Defendant were married on May 10, 2018 in Sullivan County, Tennessee.
4. The parties separated on or about March 30, 2021 and have not lived together since.
5. The marriage has become irretrievably broken, and Plaintiff seeks a divorce on grounds permitted under Ohio law. Specifically, Plaintiff and Defendant have been living separate and apart for over one year without interruption or cohabitation.
6. There were no minor children born of the marriage.

7. Plaintiff and Defendant are not joint owners of any real property.
8. Neither the Plaintiff nor Defendant is or is known to be an active-duty service member of the United States Military.
9. Neither the Plaintiff nor Defendant is known to be undergoing a bankruptcy proceeding.
10. Plaintiff wishes to remain confidential in this action.
11. Plaintiff asserts that he is entitled to a divorce from the Defendant based upon the following grounds:
 - a. Plaintiff and Defendant were lawfully married.
 - b. This Court has subject matter jurisdiction over this action pursuant to R.C. 3105.011.
 - c. This Court has *in rem* jurisdiction over the Defendant pursuant to Ohio Civ. R. 4.4. Plaintiff is requesting service be rendered by posting. In support of such service, Plaintiff states:
 - i. Plaintiff is maintaining this action *in pauperis* and has filed the necessary affidavit in support.
 - ii. Defendant's whereabouts are unknown at this time. Contemporaneous with this Complaint, Plaintiff's counsel has filed an affidavit averring diligent but unsuccessful efforts taken to locate the Defendant.
 - iii. Plaintiff and Defendant have lived separate and apart from each other without cohabitation or interruption for more than one year.
 - d. This Court is the proper venue for this action, as Plaintiff resides in Hardin County, Ohio.
 - e. Plaintiff has met the residency requirement for filing a divorce action in Ohio.

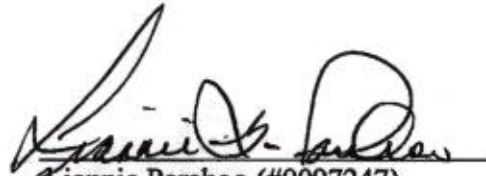
f. Plaintiff and Defendant have experienced an irretrievable breakdown of their marriage.

WHEREFORE, Plaintiff respectfully requests that this Court grant a divorce from Defendant and any further relief this Court deems proper.

Respectfully Submitted,



Grace A. L. Erwin
Legal Intern
ONU Legal Clinic
121 West High Street
Lima, Ohio 45801
(419) 227-0061
(419) 228-1096 fax
legalclinic@onu.edu



Liannie Parahoo (#0097247)
Attorney for Plaintiff
ONU Legal Clinic
121 West High Street
Lima, Ohio 458001
(419) 227-0061
(419) 228- 1096 fax
legalclinic@onu.edu

Plaintiff further acknowledges receipt of the standing orders of Hardin County Common Pleas Court of Domestic Relations Division as entailed in Rule 16 of the local rules of the Hardin County Common Pleas Court.



James Somerville

**IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

JAMES SOMERVILLE)	CASE NO. : 20253151DRB
Address Confidential)	
)	
)	
Plaintiff,)	JUDGE: M. SANTO
)	
v.)	
)	
JESSICA ANDERSON)	PLAINTIFF'S AFFIDAVIT
Address Unknown)	IN SUPPORT OF COMPLAINT FOR
)	DIVORCE WITHOUT CHILDREN
Defendant.)	

Now comes James Somerville ("Plaintiff"), by and through his legal counsel, Liannie G. Parahoo and Certified Legal Intern, Grace Erwin, and presents this Affidavit in Support of his Complaint for Divorce. Affiant, being duly sworn, states:

1. I am the Plaintiff herein.
2. I have been a resident of Hardin County in the State of Ohio for at least six months prior to the filing of this Affidavit.
3. I married Jessica Anderson on May 10, 2018 in Sullivan County, Tennessee.
4. Ms. Anderson and I have been separated since March 30, 2021 and we have lived separate and apart without cohabitation or interruption since that date.
5. There are no minor children born of the marriage or relationship.
6. Ms. Anderson and I have experienced an irretrievable breakdown of our marriage contract, prompting me to file a Divorce Complaint.
7. Ms. Anderson's address is unknown to me at this time. My counsel has been unable to obtain Ms. Anderson's address after diligent efforts and is requesting the Clerk of Courts render service by posting.

8. There have been previous instances of domestic violence by Ms. Anderson against me and I am concerned for my safety if my address were to be revealed. Therefore, my address has been intentionally left off of this Affidavit in Support. To my knowledge and belief, this Affidavit in Support is still in compliance with the service requirements of Ohio Civ. R. 4.4(A).
9. I have not had any contact with the Defendant since our separation and I do not know where she currently resides, nor do I have contact information for her.
10. I do not own any real property in my name.
11. I am not an active duty service member.
12. I am not currently involved in a bankruptcy.
13. The debts, assets, and liabilities listed in the Complaint for Divorce, and on the accompanying affidavits are correct to the best of my knowledge and understanding.
14. I am requesting that the court order the relief requested in the Complaint for Divorce.


James Somerville, Affiant

STATE OF OHIO)
) SS:
COUNTY OF HARDIN)

OATH

I, Melissa Kidder, swear or affirm that I have read this document and, to the best of my knowledge and belief, the facts and information stated in this document are true, accurate and complete. I further understand that if I do not tell the truth, I may be subject to penalties of perjury.

Sworn before me this 13th day of November, 2025.


Notary Public

[Affix Seal Here]



Melissa L. Kidder
Notary Public, State of Ohio
My Commission has no Expiration Date
Section 147.03 R.C.

**IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

JAMES SOMERVILLE)	CASE NO. : 20253151DRB
Address Confidential)	
)	
Plaintiff,)	JUDGE: M. SANTO
)	
v.)	PLAINTIFF'S AFFIDAVIT
)	OF ATTEMPTED SERVICE
JESSICA ANDERSON)	IN SUPPORT OF MOTION
Address Unknown)	FOR SERVICE BY POSTING
)	
Defendant.)	

James Somerville, AFFIANT, states upon oath or affirmation of penalty of perjury that:

1. Affiant married Jessica Anderson on May 10, 2018 in Sullivan County, Tennessee.
2. The marriage has become irretrievably broken, and Affiant seeks a divorce on grounds permitted under Ohio law. Specifically, Affiant and Ms. Anderson have been living separate and apart for over one (1) year without interruption or cohabitation. Affiant's Divorce Complaint was filed contemporaneously with this Affidavit of Attempted Service.
3. Affiant believes that Ms. Anderson resides in Sullivan County, Tennessee; however, after diligent efforts by Affiant's counsel, Ms. Anderson's residence is still unknown.
4. Affiant's counsel has conducted diligent research efforts consistent with that of another attorney in a similar situation, and has failed to retrieve an address for Ms. Anderson.

5. Therefore, service cannot be made upon Ms. Anderson because her residence is unknown to the Affiant and cannot be obtained with reasonable diligence required by Ohio Civ. R. 4.4(A).
6. Affiant requests the Court serve Ms. Anderson by posting consistent with Ohio Civ. R. 4.4(A)(2)(a).
7. Affiant is pursuing this action *in pauperis* and, pursuant to Ohio Civ. R. 4.4(A)(2)(a), requests the clerk cause service of notice to be made by posting.
8. Affiant requests his address remain confidential, as Ms. Anderson has been physically abusive towards him and he is concerned for his safety.
9. Affiant asserts that he is at least eighteen (18) years of age and otherwise competent to execute this Affidavit.

I, James Somerville, do attest that the facts contained herein are true and accurate, to the best of my knowledge and belief.


James Somerville, Affiant

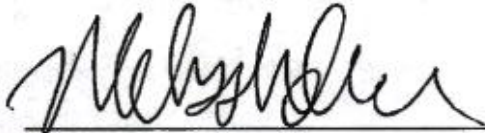
STATE OF OHIO)
COUNTY OF HARDIN)

Subscribed and sworn to before me, the undersigned Notary Public, on this 13th day of November, 2025.



[Affix seal here]

Melissa L. Kidder
Notary Public, State of Ohio
My Commission has no Expiration Date
Section 147.03 R.C.


Notary Signature

**IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

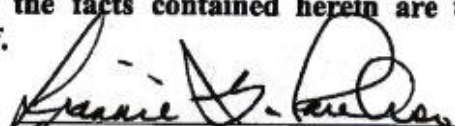
JAMES SOMERVILLE)	CASE NO. : 20253151 DRB
Address Confidential)	
)	
)	
Plaintiff,)	JUDGE: M. SANTO
)	
v.)	PLAINTIFF'S ATTORNEY'S
)	AFFIDAVIT OF ATTEMPTED
JESSICA ANDERSON)	SERVICE IN SUPPORT OF
Address Unknown)	MOTION FOR SERVICE BY
)	POSTING
)	
Defendant.)	

Liannie G. Parahoo, attorney for Plaintiff, James Somerville and Affiant herein states upon oath or affirmation of penalty of perjury that:

1. I, Liannie G. Parahoo of the ONU Legal Clinic, am the attorney of record for James Somerville, the Plaintiff in the above-captioned divorce action filed in the Hardin County Common Pleas Court on November ²⁴~~24~~, 2025.
2. The Defendant, Jessica Anderson, is the spouse of the Plaintiff and is a necessary party to this action.
3. Mr. Somerville believes that Ms. Anderson resides in Sullivan County, Tennessee. However, despite diligent efforts, Ms. Anderson's address is still unknown. My efforts to locate the Defendant include:
 - a. LexisNexis Public Records Search;
 - b. Hardin County Common Pleas Court Record Search;

- c. Sullivan County Common Pleas Court Record Search;
 - d. Ohio Public Records Search;
 - e. Facebook; and
 - f. Google search.
4. Therefore, the Defendant's address cannot be ascertained by reasonable diligence.
5. Mr. Somerville is pursuing this action *in pauperis* and Defendant's address cannot be ascertained by reasonable diligence; thus, pursuant to Ohio Civ. R. 4.4(A)(2)(a), Affiant requests the Clerk cause service to be made by posting.
6. There have been previous instances of domestic violence by Ms. Anderson against Mr. Somerville and he is concerned for his safety if his address were to be revealed. Therefore, his address has been intentionally left off of this Affidavit in Support. To my knowledge and belief, this Affidavit in Support is still in compliance with the service requirements of Ohio Civ. R. 4.4(A).
7. I assert that I am at least eighteen (18) years of age and otherwise competent to execute this Affidavit.

I, Liannie G. Parahoo, do attest that the facts contained herein are true and accurate, to the best of my knowledge and belief.


Liannie G. Parahoo, Affiant

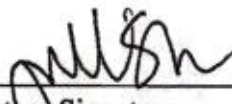
STATE OF OHIO)
COUNTY OF HARDIN)

Subscribed and sworn to before me, the undersigned Notary Public, on this 21 day of
November, 2025.



[Affix seal here]

JOELLA STERN
Notary Public
State of Ohio
My Comm. Expires
February 27, 2030



Notary Signature

**IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

JAMES SOMERVILLE)	CASE NO. : 20253151 DRB
Address Confidential)	
)	
Plaintiff,)	JUDGE: M. SANTO
)	
v.)	
)	
JESSICA ANDERSON)	PLAINTIFF'S MOTION FOR
Address Unknown)	SERVICE BY POSTING
)	
Defendant.)	

The Movant, James Sommerville, by and through his undersigned counsel, Liannie G. Parahoo, and Legal Intern, Grace Erwin, moves this Court, pursuant to Ohio Civil Rule 4.4(A)(2), for an Order which authorizes service of process on Defendant Jessica Anderson by posting for six (6) consecutive weeks consistent with the aforementioned rule.

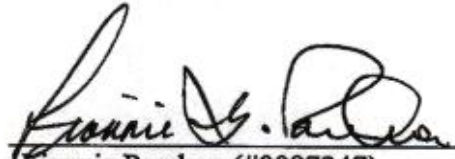
Plaintiff is indigent and unable to afford notice by publication. Plaintiff's Counsel has attempted to locate Jessica Anderson. After reasonable and diligent search efforts by Plaintiff's Counsel, Ms. Anderson's address and whereabouts remain unknown. Therefore, Plaintiff's Counsel has been unable to perfect service. In support of his motion, Movant refers to the attached affidavits.

WHEREFORE, the Movant requests that this Motion be granted and service by posting on Jessica Anderson be Ordered.

Respectfully Submitted,



Grace A. L. Erwin
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Lima, Ohio 45801
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ONU Legal Clinic
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Lima, Ohio 458001
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**IN THE COMMON PLEAS COURT OF HARDIN COUNTY, OHIO
DOMESTIC RELATIONS DIVISION**

JAMES SOMERVILLE)	CASE NO. : 20253151DRB
Address Confidential)	
)	
Plaintiff,)	JUDGE: M. SANTO
)	
v.)	
)	
JESSICA ANDERSON)	ORDER ON PLAINTIFF'S
Address Unknown)	SERVICE BY POSTING PURSUANT
)	TO OHIO CIVIL RULE 4.4
)	
Defendant.)	

This matter came before the Court upon the Plaintiff's Motion for Service by Posting pursuant to Ohio Civil Rule 4.4(A)(2). The Court, having reviewed the Motion, and the supporting Affidavits of the Plaintiff and Plaintiff's counsel, and the applicable law, finds as follows:

1. The Plaintiff has demonstrated that service of summons and the complaint cannot be made by any other method because the residence of the Defendant is unknown and cannot be ascertained with reasonable diligence.
2. The Plaintiff's counsel has provided a detailed Affidavit outlining the specific efforts made by her to locate the Defendant, which the Court finds sufficient to satisfy the "reasonable diligence" requirement under Ohio Civ. R. 4.4(A)(2).
3. The Plaintiff has requested service by posting in accordance with Ohio Civ. R. 4.4(A)(2), and the Court finds that such service is appropriate under the circumstances of this case.

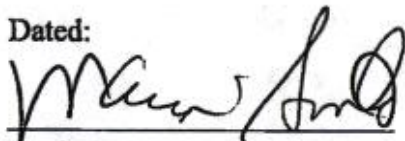
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Accordingly, it is hereby **ORDERED** that:

1. The Plaintiff is authorized to serve the Defendant by posting in the Hardin County Court of Common Pleas in accordance with Ohio Civ. R. 4.4(A)(2).
2. The Clerk shall cause a notice to be posted in a conspicuous place in the courthouse of Hardin County Court of Common Pleas and in two additional public places in the county, as designated by the Court, once a week for at least six consecutive weeks.
3. The notice shall include the name and address of the Court, the names of the parties, the case number, the name and last known address of the Defendant(s), a summary statement of the complaint, and the demand for relief.
4. The Plaintiff shall file proof of posting with the Court upon completion of the posting period.

IT IS SO ORDERED.

Dated:


Maria Santo

APPENDIX H

DOMESTIC RELATIONS ADMONISHMENT

The Hardin County Common Pleas Court has ordered that we advise you of the existence of three standing orders which apply to ALL divorce or legal separation cases. You need to understand these orders and know that their violation could result in your being found in **Contempt of Court**. A finding that you are in Contempt of Court might result in a jail sentence of up to ten (10) days and a fine of Five Hundred Dollars (\$500.00). If you have any questions regarding the rules, please be sure to ask your attorney.

1. Each party is hereby enjoined and restrained from doing, attempting to do, or threatening to do any act of injuring, maltreating, vilifying, molesting, or harassing the adverse party, their attorney, family members, employers, or any of the child(ren) of the parties.
2. Each party is hereby enjoined and restrained from selling, encumbering, contracting to sell, removing from the jurisdiction of this Court, or otherwise disposing of any of the property belonging to either of the parties, except in the ordinary course of business or unless authorized in writing by the Court.
3. Each party is hereby enjoined and restrained from changing or altering in any way, including, but not limited to, the named beneficiaries, covered persons or extent of coverage or benefits, of any life or health insurance policies, employee benefits plans or similar items or assets of a contractual nature, existing at the time of the filing of these proceedings, unless authorized in writing by the Court.
4. Each party is further enjoined from:
 - a. Changing the place of school (religious or secular) of the child or children.
 - b. Removing any child or children from the jurisdiction of this Court, other than temporarily, without first obtaining the written consent of the other party, or the Court, and
 - c. Obstructing and/or interfering with the right and privilege of the other parent to have frequent and continuing communication and physical contact with the child or children.

This is a self-executing order and any law enforcement officer is ordered to enforce the same by using whatever means are necessary to maintain the peace.