

BLANCA ESTHELA REYES DURAN
VS
ALEJANDRO PERALES SALINAS
JUICIO ESPECIAL DE DIVORCIO INCAUSADO
DEMANDA INICIAL

CJUEZ DE PRIMERA INSTANCIA
EN MATERIA FAMILIAR EN TURNO DEL
DISTRITO JUDICIAL DEL CENTRO, TAMAULIPAS
P R E S E N T E.-

C. BLANCA ESTHELA REYES DURAN, mexicana, mayor de edad y casada proporcionando conforme a derecho como domicilio, señalando para oír y recibir toda clase de acuerdos y notificaciones ubicado en calle Nuevo Laredo, en la colonia Ampliación Industrial #501 código postal 87018 Tamaulipas, ambos de esta ciudad capital. Señalando en los términos más amplios del artículo 68 bis del código de procedimientos civiles para el estado de Tamaulipas como mi abogada patrono a la C. LIC. ALEJANDRA PERALES REYES, solidando que se autorice el acceso al expediente electrónico, para recibir notificaciones y a presentar promociones digitalizadas por medio del sistema electrónico de ese máximo órgano jurisdiccional, ante Usted con el debido respeto comparezco para decir:

Por medio el presente escrito conforme a los dispuesto en el artículo 248 del código civil para el Estado de Tamaulipas; vengo a **PROMOVER JUICIO DE DIVORCIO INCAUSADO**, sobre la base de que ya no es mi voluntad continuar con el matrimonio que celebré con el **C. ALEJANDRO PERALES SALINAS**, quien puede ser ubicado, notificado y emplazado en la calle Vicente Guerrero 5, Zona centro, código postal 8700 de esta ciudad capital; toda vez que no es mi deseo continuar con el vínculo matrimonial que nos une y por ende exhibo propuestas de convenio que regulará las consecuencias inherentes a la disolución del vínculo matrimonial.

Bajo protesta de decir verdad, manifiesto a su Señoría que el suscrito no ha promovido, ni tiene conocimiento de que se haya promovido **PROCEDIMIENTO ESPECIAL DE DIVORCIO INCAUSADO DIVERSO O CUALQUIER OTRO JUICIO DE PENSIÓN ALIMENTICIA**, relacionado con los hechos que manifiestan en este escrito

PRESTACIONES

- a) La disolución del vínculo matrimonial que civilmente me une al demandado, sin señalar la causa por la cual se solicita, sino más bien, porque es mi voluntad no querer continuarlo.
- b) Solo por el caso de controversia, por el pago de las costas y gastos que el presente juicio me ocasione.
- c) La presente demanda se funda y motiva en los siguientes hechos y consideraciones de derecho, mismos que a continuación se indican.

HECHOS

PRIMERO.- En fecha 24 de Noviembre del 1994, la suscrita contrajo matrimonio civil con el C. ALEJANDRO PERALES SALINAS, Según consta en la copia certificada del acta de matrimonio emitido por el C. Oficialía Segundo del Registro Civil de esta localidad, misma que se agrega a presente como **ANEXO 1**.

SEGUNDO.- Es importante señalar que dicho matrimonio se celebró bajo el régimen de bienes separados y que actualmente tenemos nuestro último domicilio oficial conyugal ubicado en calle Nuevo Laredo, en la colonia Ampliación Industrial #501 código postal 87018 de esta ciudad capital.

TERCERO.- Cabe señalar que de dicho matrimonio procreamos a nuestras dos hijas de nombre **MARIANA y MARIA GUADALUPE** ambas con los apellidos **PERALES REYES** de 11 y 8 años de edad respectivamente, de misma que en la actualidad son menores de edad como lo acreditan con las copias certificadas de las actas de nacimiento con los números 175 y 176 expedida por el Registro Civil de esta Ciudad Capital, Documentos que se anexan como **ANEXO 2**.

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