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## Palimony Comes Under The Statute of Frauds - *New Jersey Law Journal*

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The New Jersey Supreme Court first established “palimony,” or support paid from one unmarried cohabitant to another, as a cognizable cause of action in 1979. *Kozlowski v. Kozlowski*, 80 N.J. 378 (1979). In the more than 30 years that followed, our courts consistently recognized a broad range of cohabitation agreements, most typically agreements for future support and/or distribution of property acquired by the parties — express and implied, oral and written — as valid, enforceable contracts. See, e. g., *Crowe v. DeGioia*, 90 N.J. 126, 129 (1982); *In the Matter of the Estate of Roccamonte*, 174 N.J. 381 (2002); *Houseman v. Dare*, 405 N.J. Super. 538 (App. Div. 2009).

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