Electronically Filed - ST LOUIS COUNTY - August 18, 2023 - 10:36 AM

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

In re the Marriage of:	)	
	)	
JOHN C. HOLST, III,	)	
	)	
Petitioner,	)	Cause No.:
	)	
v.	)	Division:
	)	
HANNAH D. HOLST,	)	
	)	
Respondent.	)	

PETITION FOR LEGAL SEPARATION

Comes now Petitioner, John C. Holst, III, by and through counsel, and for his Petition for Legal Separation, states:

1. Petitioner has been a resident of the State of Missouri more than 90 days immediately preceding the filing of this matter. Petitioner has been a resident of the State of Missouri and St. Louis County for approximately 46 years. Petitioner's current address is [redacted].

2. Respondent has been a resident of the State of Missouri for more than 90 days immediately preceding the commencement of this proceeding. Respondent has been a resident of the State of Missouri and St. Louis County for approximately 30 years. Respondent's current address is [redacted].

3. Petitioner and Respondent are both individuals over the age of 18 years.

4. Petitioner and Respondent were married on [redacted] and the marriage is registered in [redacted].

5. The parties separated on December 27, 2022.

6. Petitioner is currently employed by [redacted]

7. Respondent is not currently employed outside the home.

8. There is a reasonable likelihood that the marriage of parties can be preserved, and therefore, the marriage is not irretrievably broken.

9. Petitioner's Social Security Number is [redacted].

10. Respondent's Social Security Number is [redacted]

11. Upon Petitioner's information and belief, Respondent is not pregnant at this time.

12. Neither party is currently serving on active duty of the Armed Forces of the United States or any of its allies.

13. There were 2 children born of the parties' marriage, namely: [redacted], age [redacted], and [redacted], age [redacted].

14. The children have resided for 60 days immediately preceding the filing of Petitioner's Petition for Legal Separation with Petitioner and Respondent at [redacted].

15. In accordance with §452.780 RSMo, Petitioner further states that the following information is true and correct to the best of his knowledge and belief as to the parties' minor children:

a. The children's address is with Petitioner and Respondent at [redacted].

b. For the past 5 years, the children have resided at [redacted] with Petitioner and Respondent.

c. Petitioner further states that he has:

i. Not participated as a party, witness, or in any other capacity in any other proceeding concerning the custody or visitation of the minor children in this or any other state;

ii. No knowledge of any proceeding that could affect the current proceeding, including proceedings for enforcement and proceedings relating to domestic violence, protective orders, termination of parental rights, and adoptions concerning the parties or the minor children; and,

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iii. No knowledge of any person not a party to this proceeding who has physical custody or claims to have rights of legal custody, physical custody, or visitation with respect to the aforementioned children.

d. Petitioner understands he has a continuing duty to inform the Court of any proceeding in this or any other state that could affect the current proceeding.

16. No arrangements have been made as to the custody or support of the parties' children.

17. It is in the best interest of the minor children that the parties are awarded their joint legal and joint physical custody.

18. No arrangements have been made as to maintenance to be paid to Petitioner or Respondent.

19. Both parties are able-bodied and possess sufficient financial reasources with which to support the minor children and meet his/her own reasonable needs.

20. The parties have accumulated assets and debts during their marriage, and Petitioner requests an equitable division and distribution of the marital property and debts in accordance with §452.330 RSMo.

21. Petitioner has certain non-marital property, which he requests be set aside to him as his separate property.

WHEREFORE, the premises considered, Petitioner, John C. Holst, III, prays that the Court make a finding that the marriage of Petitioner and Respondent, Hannah D. Holst, is not irretrievably broken and therefore, there remains a reasonable likelihood that the marriage of the parties can be preserved; that the Court order, adjudge and decree that the parties are legally separated; that the Court award the parties joint physical and joint legal custody of the parties' children; that the Court order child support commensurate with Missouri Supreme Court Rule 88.01; that the Court set off to the parties their non-marital property, pursuant to law; that the Court divide the marital property of the parties equitably, pursuant to law; and that the Court make such further orders as the Court may deem just and proper.

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STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

Comes now John C. Holst, III, Petitioner herein, being duly sworn on his oath deposes and states that the facts stated in the foregoing Petition for Legal Separation are true and correct according to his best knowledge, information and belief.

John C. Holst, III

Subscribed and sworn to before me this 18th day of August, 2023.

Notary Public

My Commission Expires:

BRITNEY J. HAMMONDS
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES MARCH 1, 2025
ST. LOUIS COUNTY
COMMISSION #17343316

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