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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, MISSOURI
FAMILY COURT DIVISION

KURT BERGMIRE,	)	
	)	
Petitioner,	)	Cause No. 23AB-DR00486
	)	
v.	)	Division 7
	)	
BOBBIE BERGMIRE,	)	
	)	
Respondent.	)	

PETITIONER'S ANSWER TO RESPONDENT'S COUNTER-PETITION FOR DISSOLUTION OF MARRIAGE

COMES NOW, Petitioner Kurt Bergmire, by and through his undersigned counsel, and for his Petitioner's Answer to Respondent's Counter-Petition for Dissolution of Marriage, states as follows:

1. Petitioner admits the allegations contained in Paragraph 1 of Respondent's Counter Petition for Dissolution of Marriage.
2. Petitioner admits the allegations contained in Paragraph 2 of Respondent's Counter-Petition for Dissolution of Marriage.
3. Petitioner admits the allegations contained in Paragraph 3 of Respondent's Counter-Petition for Dissolution of Marriage.
4. Petitioner denies the allegations contained in Paragraph 4 of Respondent's Counter-Petition for Dissolution of Marriage and demands strict proof of the same.
5. Petitioner admits the allegations contained in Paragraph 5 of Respondent's Counter-Petition for Dissolution of Marriage.
6. Petitioner admits the allegations contained in Paragraph 6 of Respondent's Counter-Petition for Dissolution of Marriage.

7. Petitioner admits the allegations contained in Paragraph 7 of Respondent's Counter-Petition for Dissolution of Marriage.

8. Petitioner admits the allegations contained in Paragraph 8 of Respondent's Counter-Petition for Dissolution of Marriage.

9. Petitioner admits the allegations contained in Paragraph 9 of Respondent's Counter-Petition for Dissolution of Marriage.

10. Petitioner admits the allegations contained in Paragraph 10 of Respondent's Counter-Petition for Dissolution of Marriage.

11. Petitioner admits the allegations contained in Paragraph 11 of Respondent's Counter-Petition for Dissolution of Marriage.

12. Petitioner denies the allegations contained in Paragraph 12 of Respondent's Counter-Petition for Dissolution of Marriage and demands strict proof of the same.

13. Petitioner denies the allegations contained in Paragraph 13 of Respondent's Counter-Petition for Dissolution of Marriage and demands strict proof of the same.

14. Petitioner denies each and every allegation not specifically admitted herein.

15. Petitioner has incurred attorney fees and costs associated with this cause and requests Respondent be responsible for the same.

WHEREFORE, Petitioner, Kurt Bergmire, prays this Court enter Orders as follows:

A. Denying Respondent's Counter-Petition for Dissolution of Marriage and instead proceeding with Petitioner's Petition for Dissolution of Marriage;

B. Granting a Judgment of Dissolution of Marriage dissolving the marriage of Petitioner and Respondent;

C. That Petitioner and Respondent each be awarded their own separate property;

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D. That the marital property and debts be divided in a fair and equitable manner;

E. That this Court order that neither party receive spousal maintenance from the other party with said order being non-modifiable;

F. That Respondent be restored to her a maiden or former name should she request the same;

G. Awarding Petitioner a judgment against Respondent for his attorney fees and court costs; and

H. For such other and further relief as this Honorable Court deems just and proper in the circumstances.

STATE OF MISSOURI)
COUNTY OF St Louis) SS:
)

COMES NOW, Petitioner Kurt Bergmire, being of lawful age and after being duly sworn, states that he has read the foregoing Petitioner's Answer to Respondent's Counter-Petition for Dissolution, and that the facts therein are true and correct according to the best of his knowledge, information, and belief.

Kurt Bergmire

Kurt Bergmire, Petitioner

Subscribed and sworn to before me, a Notary Public, this 17th day of January, 2024.

Atiq Rehman

Notary Public

My Commission Expires:
Dec. 19, 2025

ATIQ UR REHMAN
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Dec. 19, 2025
Commission # 13875783

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Respectfully submitted,

FAMILY LAW PARTNERS

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the forgoing was served upon all parties and counsel of record via the Missouri Electronic Notification System in accordance with the Missouri Revised Statutes and Rules of Civil Procedure on this 18 day of January 2024.

Ms. Laura H. Stobie
Ms. Kenzie R. Mooty
Attorneys for Respondent

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