Electronically Filed - ST LOUIS COUNTY - January 05, 2024 - 10:34 AM

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

JAMES MOTLIK,	)	
	)	
Petitioner,	)	
	)	Cause No. 23SL-DR04759
vs.	)	
	)	Div. No. 64
KATHRYN DAVIS,	)	
	)	
Respondent.	)	

PETITIONER'S ANSWER TO RESPONDENT'S COUNTER-PETITION FOR CHILD CUSTODY AND CHILD SUPPORT

COMES NOW Petitioner JAMES MOTLIK ("Petitioner"), by and through the undersigned counsel, and for his Answer to Respondent's Counter-Petition for Child Custody and Child Support states and alleges to the Court as follows:

1. Petitioner admits the allegations contained in paragraph 1 of Respondent's Counter-Petition for Child Custody and Child Support.

2. Petitioner admits the allegations contained in paragraph 2 of Respondent's Counter-Petition for Child Custody and Child Support.

3. Petitioner admits the allegations contained in paragraph 3 of Respondent's Counter-Petition for Child Custody and Child Support.

4. Petitioner admits the allegations contained in paragraph 4 of Respondent's Counter-Petition for Child Custody and Child Support.

5. Petitioner admits the allegations contained in paragraph 5 including all subparts of Respondent's Counter-Petition for Child Custody and Child Support.

6. Petitioner admits the allegations contained in paragraph 6 of Respondent's Counter-Petition for Child Custody and Child Support.

7. Petitioner admits the allegations contained in paragraph 7 including all subparts of

Respondent's Counter-Petition for Child Custody and Child Support.

8. Petitioner denies the allegations contained in paragraph 8 of Respondent's Counter-Petition for Child Custody and Child Support.

9. Petitioner admits the allegations contained in paragraph 9 of Respondent's Counter-Petition for Child Custody and Child Support.

10. Petitioner denies the allegations contained in paragraph 10 of Respondent's Counter-Petition for Child Custody and Child Support. By way of further answer, Petitioner asserts that Respondent is able-bodied, earning sufficient income, and can adequately contribute to the care and support of the minor children.

11. Petitioner admits the allegations contained in paragraph 11 of Respondent's Counter-Petition for Child Custody and Child Support.

12. Petitioner denies the allegations contained in paragraph 12 of Respondent's Counter-Petition for Child Custody and Child Support. By way of further answer, Petitioner asserts that Respondent is able-bodied, earning sufficient income, and can adequately pay for her own attorneys' fees and litigation costs incurred in this case.

WHEREFORE, having fully answered Respondent's Counter-Petition for Child Custody and Child Support, Petitioner James Motlik, prays the Court dismiss Respondent's Counter-Petition for Order of Child Custody and Child support, proceeding with the prayed relief requested in Petitioner's Petition for Order of Child Custody and Child Support; awarding Petitioner attorneys' fees in defending against Respondent's Counter-Petition; and for such other and further relief as this Court may deem just and proper.

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JAMES MOTLIK, Petitioner

STATE OF MISSOURI)
) SS
COUNTY OF ST LOUIS)

JAMES MOTLIK, being first duly sworn upon his oath, states that he is the Petitioner in the above Answer to Respondent's Counter-Petition for Child Custody and Child Support, that he has read the same, and the facts stated herein are true are true to the best of his knowledge, information and belief.

JAMES MOTLIK, Petitioner

On this 4th day of January 2024, before me personally appeared JAMES MOTLIK, to me known to be the person described in and who executed the foregoing instrument, and acknowledged that he executed the same as his free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year first above written.

Notary Public
My Term Expires: 1-17-2026

ADAM LEE COONCE
Notary Public, Notary Seal
State of Missouri
St. Louis County
Commission # 22464563
My Commission Expires 01-17-2026

Not an Official Court Document

Respectfully submitted,
McCARTHY, LEONARD & KAEMMERER, L.C.

By: */s/ Kenzie R. Mooty*

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Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of January 2024, a true and exact copy of the foregoing was served by way of the courts electronic filing system.

/s/ Kenzie R. Mooty

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