Electronically Filed - ST LOUIS COUNTY - November 06, 2023 - 09:41 AM

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

In re the Marriage of:	)	
	)	
JOHN C. HOLST, III,	)	
	)	
Petitioner,	)	Cause No.: 23SL-DR03728
	)	
v.	)	Division: 64
	)	
HANNAH D. HOLST,	)	
	)	
Respondent.	)	

PETITIONER'S ANSWER TO RESPONDENT'S COUNTER-PETITION FOR LEGAL SEPARATION

Comes now Petitioner, John C. Holst, III, by and through counsel, and for his Answer to Respondent's Counter-Petition for Legal Separation ("Counter-Petition"), states:

1. Petitioner admits the allegations contained in Paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14 of Respondent's Counter-Petition.

2. Petitioner admits the allegation contained in Paragraph 15 of Respondent's Counter-Petition that Respondent is not employed outside of the home, but denies the remaining allegations contained therein.

3. Petitioner admits the allegations contained in Paragraph 16 of Respondent's Counter-Petition that he is able-bodied, earning a wage, and able to support himself, but denies the remaining allegations contained therein.

4. Petitioner denies the allegations contained in Paragraph 17 of Respondent's Counter-Petition.

WHEREFORE, the premises considered, Petitioner, John C. Holst, III, prays for an order of this Court denying the relief sought by Respondent, Hannah D. Holst, in her Counter-Petition for Legal Separation, dismissing Respondent's Counter-Petition for Legal Separation and proceeding with Petitioner's Petition for Legal Separation; that the Court make a finding that the marriage of Petitioner and Respondent 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 Answer to Respondent's Counter-Petition are true and correct according to his best knowledge, information and belief.

John C. Holst, III

Subscribed and sworn to before me this 31st day of October, 2023.

Kristen Hines
Notary Public

My Commission Expires: 6/14/2027

KRISTEN NICOLE HINES
Notary Public - Notary Seal
St Louis County - State of Missouri
Commission Number 22455577
My Commission Expires Jun 14, 2027

SPIRN FAMILY LAW

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6 day of November, 2023, a copy of the foregoing was served by electronic filing pursuant to Rule 103.08 to: Laura H. Stobie, *Attorney for Respondent*, who is registered with the court to receive filings electronically.

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