Electronically Filed - ST LOUIS COUNTY - November 08, 2023 - 04:34 PM

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

COURTNEY K. KINCADE,	)		
	)		
Petitioner,	)	Cause No.	23SL-DR04228
	)		
v.	)	Div No.	33
	)		
MICHAEL W. TAYLOR,	)		
	)		
Respondent.	)		

RESPONDENT'S ANSWER AND
COUNTER-PETITION FOR DISSOLUTION OF MARRIAGE

COMES NOW Respondent MICHAEL W. TAYLOR, by and through undersigned counsel, and for his Answer to Petitioner's Petition for Dissolution of Marriage ("Petition"), states as follows:

1. Respondent admits the allegations in Paragraph One of Petitioner's Petition.

2. Respondent admits the allegations in Paragraph Two of Petitioner's Petition with exception that his address is 6678 Clifton Bluffs Ct, St Louis Missouri 63129.

3. Respondent admits the allegations in Paragraph Three of Petitioner's Petition with exception that the marriage was registered in St. Louis City, State of Missouri.

4. Respondent admits the allegations in Paragraph Four of Petitioner's Petition.

5. Respondent admits the allegations in Paragraph Five of Petitioner's Petition.

6. Respondent is without sufficient information to admit or deny the allegations in Paragraph Six of Petitioner's Petition.

7. Respondent admits the allegations in Paragraph Seven of Petitioner's Petition.

8. Respondent admits the allegations in Paragraph Eight of Petitioner's Petition.

9. Respondent admits the allegations in Paragraph Nine of Petitioner's Petition.

Electronically Filed - ST LOUIS COUNTY - November 08, 2023 - 04:34 PM

WHEREFORE, Respondent prays the Court dismiss Petitioner's Petition for Dissolution and proceed on the relief requested in Respondent's Counter-Petition for Dissolution.

COUNTER-PETITION FOR DISSOLUTION

COMES NOW Respondent MICHAEL W. TAYLOR, by and through undersigned counsel, and for his Counter-Petition for Dissolution of Marriage ("Counter-Petition"), states as follows:

1. Respondent is and has been a resident of the State of Missouri ninety (90) days immediately preceding the filing of this Counter-Petition, currently residing in the County of St. Louis at 6678 Clifton Bluffs Ct, St Louis Missouri 63129. Respondent is employed, and the last four digits of his social security number are [redacted].
2. Petitioner is a resident of the State of Illinois, currently residing in the County of Sangamon at 14 North Cotton Hill Lane, Springfield, Illinois 62712. Petitioner is employed and the last four digits of her social security number are [redacted].
3. Respondent and Petitioner were married on November 13, 2021, said marriage being registered in the City of St. Louis, Missouri.
4. Petitioner and Respondent separated and ceased living together as husband and wife in or about May of 2023.
5. There were no unemancipated children born or adopted during the marriage.
6. Upon Respondent's belief, Petitioner is not now pregnant.
7. Neither party is a member of the Armed Forces of the United States of America nor its allies.
8. There is no reasonable likelihood that the marriage of Respondent and Petitioner can be preserved and, therefore, the marriage is irretrievably broken.

9. Prior to their marriage, the parties entered into a Premarital Agreement, a copy of which it is attached hereto as Exhibit A and is incorporated herein by reference. Said Premarital Agreement, which is valid and enforceable, characterizes and divides the parties' property interests and debts, and governs the parties' obligations to one another with respect to support and attorneys' fees in the event of dissolution of marriage.

WHEREFORE, Respondent MICHAEL W. TAYLOR prays that the Court enter its Judgment dissolving the marriage; that the Court enforce the terms of the parties' Premarital Agreement and enter its judgment carry out the terms of said Agreement; and that the Court make such other and further orders as may seem just and proper in the premises.

[remainder left intentionally blank]

Electronically Filed - ST LOUIS COUNTY - November 08, 2023 - 04:34 PM

MICHAEL W. TAYLOR, Respondent

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

MICHAEL W. TAYLOR, being of lawful age and after being duly sworn, states that he is Respondent and that the facts stated in his Answer and Counter-Petition for Dissolution of Marriage are true and correct to his best knowledge, information, and belief.

MICHAEL W. TAYLOR, Respondent

On this 2nd day of November 2023, before me personally appeared MICHAEL W. TAYLOR to me known as the person described in and who executed the forgoing instrument and acknowledged that he executed the same as his free act and deed.

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

Adam Lee Coonce
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

Electronically Filed - ST LOUIS COUNTY - November 08, 2023 - 04:34 PM

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

By: */s/ Laura H. Stobie*

Laura H. Stobie #62154
Attorneys for Respondent
825 Maryville Centre #300
Town & Country, MO 63017
314-392-5200
314-392-5221 (fax)
lstobie@mlklaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 8th of November 2023, a true and exact copy of the foregoing was served via e-filing system to all parties of record.

/s/ Laura H. Stobie

Electronically Filed - ST LOUIS COUNTY - November 08, 2023 - 04:34 PM