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

In re the matter of:	)	
SEJAD DZANANOVIC,	)	
	)	Cause Number: 17SL-DR00517-01
Petitioner,	)	
	)	Division Number: 64
and	)	
	)	
SELMA DZANANOVIC n/k/a,	)	
SELMA TOPALOVIC,	)	
	)	
Respondent.	)	

RESPONDENT'S ANSWER TO PETITIONER'S COUNTER MOTION TO MODIFY

Comes now Respondent, Selma Dzananovic n/k/a Selma Topalovic, and for her answer to Petitioner's Counter Motion to Modify, states as follows:

1. Respondent admits the allegations contained in Paragraph One of Petitioner's Counter Motion to Modify. Further answering, the Judgment of Dissolution of Marriage was entered on December 26, "2017".

2. Respondent denies the allegation contained in Paragraph Two of Petitioner's Counter Motion to Modify [redacted] Respondent admits the remaining allegations contained in Paragraph Two of Petitioner's Counter Motion to Modify.

3. Respondent admits the allegations contained in Paragraph Three of Petitioner's Counter Motion to Modify.

4. Respondent denies the allegations contained in Paragraph Four of Petitioner's Counter Motion to Modify.

5. Respondent denies the allegations contained in Paragraph Five of Petitioner's Counter Motion to Modify.

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Petitioner's answers to Paragraph Five subparts are as follows:

a. Respondent is without information or belief with which to either admit or deny the allegations contained in Paragraph Five A of Petitioner's Counter Motion to Modify however, for purposes of this litigation, Respondent denies same.

b. Respondent denies the allegations contained in Paragraph Five B of Petitioner's Counter Motion to Modify.

c. Respondent admits the allegations contained in Paragraph Five C of Petitioner's Counter Motion to Modify. [redacted]

d. Respondent is without information or belief with which to either admit or deny the allegations contained in Paragraph Five D of Petitioner's Counter Motion to Modify however, for purposes of this litigation, Respondent denies same.

e. Respondent denies the allegations contained in Paragraph Five E of Petitioner's Counter Motion to Modify.

f. Respondent denies the allegations contained in Paragraph Five F of Petitioner's Counter Motion to Modify.

g. Respondent is without information or belief with which to either admit or deny the allegations contained in Paragraph Five G of Petitioner's Counter Motion to Modify however, for purposes of this litigation, Respondent denies same.

h. Respondent denies the allegations contained in Paragraph Five H of Petitioner's Counter Motion to Modify.

i. Respondent admits the allegation contained in Paragraph Five I of Petitioner's Counter Motion to Modify [redacted] Further answering, Respondent denies the remaining allegations contained in Paragraph Five I of Petitioner's Counter Motion to Modify.

6. Respondent denies the allegations contained in Paragraph Six of Petitioner's Counter Motion to Modify.

7. Respondent is without information or belief with which to either admit or deny the allegations contained in Paragraph Seven of Petitioner's Counter Motion to Modify however, for purposes of this litigation, Respondent admits same.

8. Respondent denies the allegations contained in Paragraph Eight of Petitioner's Counter Motion to Modify.

9. Paragraph Nine of Petitioner's Counter Motion to Modify does not contain a fact or allegation with which a response is required.

WHEREFORE, Respondent prays this Court dismiss Petitioner's Counter Motion to Modify; proceed with Respondent's Motion to Modify and for further orders as the Court shall deem just and proper in the premises.

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

The undersigned, being duly sworn upon her oath, deposes and states that the facts and matters stated in the foregoing are true and correct according to her best information, knowledge and belief.

Selma Topalovic

Selma Topalovic f/n/a Dzananovic,
Respondent

Subscribed and sworn to before me this 6th day of October, 2023.

Marissa Faith Tayoan

Notary Public

My Commission Expires:

MARISSA FAITH TAYOAN
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Sep. 06, 2026
Commission # 22153368

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MARISSA FAITH TAYGAN
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Sep. 06, 2028
Commission # 22153356

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Respectfully submitted,
THE CARSON LAW FIRM

/s/ Leigh Joy Carson
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Attorney for Respondent
Selma Dzananovic n/k/a Selma Topalovic

Certificate of Service

A copy of the foregoing was sent via e-file system to all parties of record on this 6th day of October, 2023.

/s/ Leigh Joy Carson