Electronically Filed - FRANKLIN COUNTY - January 16, 2024 - 10:24 AM

IN THE FAMILY COURT OF FRANKLIN COUNTY
STATE OF MISSOURI

IN RE THE MARRIAGE OF:	)	
	)	
KURT M. BERGMIRE	)	
	)	Cause No. 23AB-DR00486
Petitioner,	)	
	)	Division No.
v.	)	
	)	
BOBBIE A. BERGMIRE,	)	
	)	
Respondent.	)	
	)	

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

COMES NOW Respondent, BOBBIE A. BERGMIRE, by and through her legal counsel, and for her Answer to Petitioner's Petition for Dissolution of Marriage, states to the Court as follows:

1. Respondent admits the allegations contained in Paragraph One (1) of Petitioner's Petition for Dissolution of Marriage.

2. Respondent admits the allegations contained in Paragraph Two (2) of Petitioner's Petition for Dissolution of Marriage.

3. Respondent admits the allegations contained in Paragraph Three (3) of Petitioner's Petition for Dissolution of Marriage.

4. Respondent admits the allegations contained in Paragraph Four (4) of the Petition for Dissolution of Marriage.

5. Respondent admits the allegations contained in Paragraph Five (5) of Petitioner's Petition for Dissolution of Marriage.

6. Respondent admits the allegations in Paragraph Six (6) of Petitioner's Petition for Dissolution of Marriage.

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7. Respondent admits the allegations contained in Paragraph Seven (7) of Petitioner's Petition for Dissolution of Marriage.

8. Respondent admits the allegations contained in Paragraph Eight (8) of Petitioner's Petition for Dissolution of Marriage.

9. Respondent admits the allegations contained in Paragraph Nine (9) of Petitioner's Petition for Dissolution of Marriage.

10. Respondent admits the allegations contained in Paragraph Ten (10) of Petitioner's Petition for Dissolution of Marriage.

11. Respondent admits the allegations contained in Paragraph Eleven (11) of Petitioner's Petition for Dissolution of Marriage.

12. Respondent admits the allegations contained in Paragraph Twelve (12) of Petitioner's Petition for Dissolution of Marriage.

13. Respondent admits the allegations contained in Paragraph Thirteen (13) of Petitioner's Petition for Dissolution of Marriage.

14. Respondent admits the allegations contained in Paragraph Fourteen (14) of Petitioner's Petition for Dissolution of Marriage.

15. Respondent admits the allegations contained in Paragraph Fifteen (15) of Petitioner's Petition for Dissolution of Marriage.

16. Respondent denies the allegations contained in Paragraph Sixteen (16) of Petitioner's Petition for Dissolution of Marriage.

17. Respondent admits the allegations contained in Paragraph Seventeen (17) of Petitioner's Petition for Dissolution of Marriage.

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18. Respondent denies the allegations contained in Paragraph Eighteen (18) of Petitioner's Petition for Dissolution of Marriage.

19. Respondent denies the allegations in Paragraph Nineteen (19) of Petitioner's Petition for Dissolution of Marriage.

COUNTER-PETITION FOR DISSOLUTION

COMES NOW Respondent, BOBBIE A. BERGMIRE, by and through the law firm of McCarthy, Leonard, & Kaemmerer, LC, and for her Counter-Petition for Dissolution of Marriage, states as follows:

1. Petitioner is a resident of the State of Missouri and has resided here for a period exceeding ninety (90) days prior to the filing of this action, currently residing in the County of Franklin, Missouri at 2567 Glen View Drive, Pacific, Missouri, 63069. Petitioner is employed and the last four digits of his social security number are [redacted].

2. Respondent is a resident of the State of Missouri and has resided here for a period exceeding ninety (90) days prior to the filing of this action, currently residing in the County of Franklin, Missouri at 2567 Glen View Drive, Pacific, Missouri, 63069. Respondent is employed, and the last four digits of her social security number are [redacted]

3. Petitioner and Respondent were married on October 11, 1997, said marriage being registered in the County of St. Louis, Missouri.

4. Petitioner and Respondent currently reside together but constructively separated on or about December 1, 2024.

5. There are no minor children of the marriage.

6. Respondent is not pregnant at the time of filing this cause of action.

7. Both parties are possessed of certain separate property and certain marital property

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and debt.

8. Respondent requests that each party's separate property and debt be set aside to the respective party.

9. Respondent requests that the marital property and debt be equally distributed by this Court.

10. Neither party is a member of the Armed Forces of the United States of America nor its allies.

11. There is no reasonable likelihood that the marriage of Petitioner and Respondent can be preserved and, therefore, the marriage is irretrievably broken.

12. Both parties are able to earn a substantial and lucrative wage to support themselves. Neither party is in need of maintenance from the other.

13. Both parties are able to earn a substantial and lucrative wage sufficient to pay his or her own legal fees in this matter.

WHEREFORE, Respondent Bobbie A. Bergmire prays that the marriage be dissolved; that the Court set apart to Respondent her separate property; that the Court equally divide the marital property of the parties; that each party bear his or her own attorneys' fees; and that the Court make such other and further orders as may seem just and proper in the premises.

BOBBIE A. BERGMIRE, Respondent

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BOBBIE A. BERGMIRE of lawful age, being first duly sworn upon her oath, states that she is the Respondent herein and that the facts stated in this Answer and Counter Petition for Dissolution of Marriage are true and correct to the best of her knowledge, information and belief.

BOBBIE A. BERGMIRE, Respondent

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

On this 16 day of January, 2024, before me personally appeared BOBBIE A. BERGMIRE, to me known to be the person described in and who executed the foregoing instrument, and acknowledged that she executed the same as her 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.

HOLLY YOUNG
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES AUGUST 26, 2027
ST. LOUIS COUNTY
COMMISSION #19937715

Notary Public
My Term Expires:

McCARTHY, LEONARD & KAEMMERER, L.C.

By: /s/ Laura H. Stobie

Laura H. Stobie #62154
Kenzie R. Mooty #75685
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CERTIFICATE OF SERVICE

A true and accurate copy of the above and foregoing was served in accordance with Rule 55.03(a) and Rule 103.08 of the Missouri Rules of Civil Procedure, through the electronic filing system of the State of Missouri on this 16th of January, 2024 to the attorneys of record on file.

/s/ Laura H. Stobie

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