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IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

In Re the Marriage of:	)	
	)	
JOHN C. HOLST, III,	)	
	)	Cause No. 23SL-DR03728
Petitioners,	)	
	)	Div No. 64
v.	)	
	)	
HANNAH D. HOLST,	)	
	)	
Respondent.	)	

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

COMES NOW Respondent HANNAH D. HOLST, by and through undersigned attorney, and for her Answer to Petitioner's Petition for Legal Separation ("Petition"), states as follows:

ANSWER

1. Respondent admits all allegations contained in Paragraph 1 of Petitioner's Petition except Respondent denies that Petitioner's current address is [redacted]
2. Respondent admits the allegations contained in Paragraph 2 of Petitioner's Petition.
3. Respondent admits the allegations contained in Paragraph 3 of Petitioner's Petition.
4. Respondent admits the allegations contained in Paragraph 4 of Petitioner's Petition.
5. Respondent denies the allegations contained in Paragraph 5 of Petitioner's Petition.
6. Respondent admits the allegations contained in Paragraph 6 of Petitioner's Petition.
7. Respondent admits the allegations contained in Paragraph 7 of Petitioner's Petition.
8. Respondent admits the allegations contained in Paragraph 8 of Petitioner's Petition.
9. Respondent admits the allegations contained in Paragraph 9 of Petitioner's Petition.
10. Respondent admits the allegations contained in Paragraph 10 of Petitioner's Petition.

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11. Respondent admits the allegations contained in Paragraph 11 of Petitioner's Petition.

12. Respondent admits the allegations contained in Paragraph 12 of Petitioner's Petition.

13. Respondent admits the allegations contained in Paragraph 13 of Petitioner's Petition.

14. Respondent admits the allegations contained in Paragraph 14 of Petitioner's Petition.

15. Respondent responds to the allegations contained in Paragraph 15 of Petitioner's Petition as follows:

a. Respondent admits the allegations contained in Paragraph 15.a. of Petitioner's Petition.

b. Respondent admits the allegations contained in Paragraph 15.b. of Petitioner's Petition.

c. Respondent neither admits nor denies the allegations contained in Paragraph 15.c. of Petitioner's Petition as said allegation speaks to Petitioner's knowledge only.

d. Respondent neither admits nor denies the allegations contained in Paragraph 15.d. of Petitioner's Petition as said allegation speaks to Petitioner's knowledge only.

16. Respondent admits the allegations contained in Paragraph 16 of Petitioner's Petition.

17. Respondent admits the allegations contained in Paragraph 17 of Petitioner's Petition.

18. Respondent admits the allegations contained in Paragraph 18 of Petitioner's Petition.

19. Respondent denies the allegations contained in Paragraph 19 of Petitioner's Petition.

20. Respondent admits that the parties have accumulated assets and debts during their marriage and denies the remaining allegations contained in Paragraph 20 of Petitioner's Petition.

21. Respondent denies the allegations contained in Paragraph 21 of Petitioner's Petition.

WHEREFORE, Respondent HANNAH D. HOLST, having fully answered Petitioner's Petition, moves this Court for an Order dismissing or denying Petitioner's Petition, proceeding with the prayed relief requested in Respondent's Counter-Petition for Legal Separation, awarding Respondent attorneys' fees in defending against Petitioner's Petition, and for such other and further relief this Court deems just and proper.

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COUNTER-PETITION FOR LEGAL SEPARATION

COMES NOW Respondent HANNAH D. HOLST, by and through undersigned counsel, and for her Counter-Petition for Legal Separation ("Counter-Petition"), states as follows:

1. That 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, Missouri at [redacted] Respondent is unemployed and the last four digits of her social security number are [redacted]

2. That to the best of Respondent's knowledge, Petitioner JOHN C. HOLST, III is a resident of the State of Missouri, currently residing in the County of St. Louis, Missouri. Petitioner is employed and the last four digits of his social security number are [redacted]

3. That Respondent and Petitioner were married on [redacted] said marriage being registered in [redacted]

4. That Respondent and Petitioner separated and ceased living together as wife and husband on or about December 27, 2022.

5. That neither party is a member of the Armed Forces of the United States of America nor its allies.

6. That there is a reasonable likelihood that the marriage can be preserved and therefore, the marriage is not irretrievably broken.

7. That parties have certain marital property and debts and have not entered into a property settlement agreement as of the date of filing of this Counter-Petition.

8. That parties also have separate property and debts and have not entered into a property settlement agreement as of the date of filing of this Counter-Petition.

9. That there are two unemancipated children of the marriage, namely: [redacted]

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10. That for the past six (6) months immediately preceding the filing of this Counter-Petition, the minor children have resided with Respondent and Petitioner at [redacted]

11. That Respondent is not pregnant.

12. That the parties have no formal agreement as to custody or visitation of the minor children. However, it is in the best interests of the children that Petitioner and Respondent share joint legal and physical care, custody and control of the children pursuant to an agreed upon Parenting Plan.

13. That Respondent has not participated and has no knowledge or information of any other custody proceeding concerning the children pending in any Court of this State or any other; and Respondent has no knowledge of any person not a party to this proceeding who has physical custody of the children or claims to have custody or visitation rights with respect to the children.

14. That the parties have no formal agreement as to support of the minor children. However, the minor children are in need of support.

15. That Respondent is not capable of supporting herself and the children. Respondent is not employed outside the home and is therefore in need of maintenance from Petitioner.

16. That Petitioner is able-bodied, earning a substantial and lucrative wage, and is with sufficient funds to enable him of supporting himself, contributing to the support of the children, and providing Respondent with a monthly amount for maintenance.

17. That Respondent is not able to pay her attorney fees and the expenses and costs of this litigation and that Petitioner is gainfully employed and capable of paying Respondent's attorney fees and costs.

WHEREFORE, Respondent prays that this Honorable Court: enter a Judgment of Legal Separation; set aside to Respondent and Petitioner their respective separate property and debt;

divide the marital property and debts in a fair and equitable manner; award the parties joint legal care, custody and control of the minor children, [redacted] order Petitioner to pay child support to Respondent in accordance with the Supreme Court authorized support guidelines retroactively to the time of filing; order Petitioner to pay maintenance to Respondent retroactively to the time of filing; order Petitioner to pay Respondent's attorneys fees and costs associated with this litigation; and for such other and further relief as this Court deems just and proper in the premises.

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Hannah Holst

HANNAH D. HOLST, Respondent

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

HANNAH D. HOLST, 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 to Petitioner's Petition for Legal Separation and Counter-Petition for Legal Separation are true and correct to the best of her knowledge, information and belief.

Hannah Holst

HANNAH D. HOLST, Respondent

On this 29th day of September, 2023, before me personally appeared HANNAH D. HOLST, to me known to be the person described in and who executed the foregoing instrument, and acknowledged that she 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.

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

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

By: */s/ Laura H. Stobie*
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314-392-5221 (fax)
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Attorneys for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on the 29th of September, 2023, a true and exact copy of the foregoing was served via e-filing system to all parties of record.

/s/ Laura H. Stobie