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IN CHANCERY COURT OF HICKMAN COUNTY, TENNESSEE
AT CENTERVILLE

ANNA D[redacted]KENNEDY, **Plaintiff**	)	
-VS-	)	**Docket No.: 24-CV-7930**
MATTHEW D[redacted]KENNEDY, **Defendant**	)	

ANSWER TO COMPLAINT FOR DIVORCE AND COUNTER-COMPLAINT

Comes now the Defendant, Matthew D[redacted]Kennedy (hereinafter "Husband"), and responds to the Complaint for Divorce filed against him by the Plaintiff, Anna D[redacted]Kennedy (Hereinafter "Wife") as follows:

1. As to the allegations in paragraph number one (1) they are admitted.
2. As to allegations in paragraph number two (2) it is admitted.
3. As to the allegations in paragraph numbered three (3) it is denied.
4. As to the allegations in paragraph numbered four (4) it is denied that the parties have entered into a Marital Dissolution Agreement.
5. As to the allegations in paragraph numbered five (5) it is admitted.
6. As to the allegations in paragraph numbered six (6) it is admitted.

AFFIRMATIVE DEFENSES

1. The Wife fails to state a ground for which relief may be granted.
2. The Husband hereby avers that the ill conduct of the Wife was a justifiable cause for any conduct complained or against him, if any, and if substantiated, thereby he requests the Court to dismiss the Petition heretofore filed against him.

WHEREFORE PREMISES CONSIDERED the Husband files the following as a Counter-Complaint for Divorce against the Wife:

1. The allegation for jurisdiction and the statistical data is hereby admitted and incorporated into this Counter-complaint as if stated verbatim herein.

2. The Husband has been a resident and citizen of Hickman County, Tennessee for more than six (6) months preceding the filing of this Complaint.

3. Husband charges the Wife with the following statutory grounds for divorce:

a. Certain irreconcilable differences have arisen in the marriage of the parties, and they are such that the parties can no longer live together as Husband and Wife and the marriage is irretrievably broken.

b. The Husband would submit that the Wife is guilty of inappropriate marital conduct.

4. The Husband would show that the parties do now own real property.

5. The Husband would show that the parties do own various personal marital property, household goods and furnishings and special assets, and marital debt subject to an equitable division by the Court.

6. The Defendant would show that the Plaintiff is both able bodied and capable of paying Spousal Support both on a temporary and permanent basis.

WHEREFORE, Husband prays for the following relief:

1. That the Complaint for Divorce filed against him be dismissed with the cost taxed to the Wife.

2. That the Wife be served with the Answer and Counter-Complaint, by and through her attorney of record, and that she answers within the time prescribed by law.

3. That the Husband be granted an absolute divorce from the bonds of matrimony from the Wife.

4. That upon a hearing of this cause the Honorable Court makes an equitable division and distribution of all the parties' properties and debts.

5. That the Plaitiff pay Spousal Support both on a Temporary and Permanent basis.

6. That upon a hearing of this cause the Wife be ordered to pay reasonable attorney's fees and cost.

7. For any such other further and general relief to which the Husband and minor children may be entitled.

[redacted]

MATTHEW D[redacted]KENNEDY

STATE OF TENNESSEE
COUNTY OF DICKSON

I, **MATTHEW D[redacted]KENNEDY**, being first duly sworn according to law, makes oath that affiant has read or has had read to the affiant the foregoing aforementioned and that the facts set forth therein are true to the best of the affiants knowledge, information and belief, and that the affiants Answer and Counter-Complaint is not made out of levity or by collusion with the Plaintiff, but in sincerity and truth and for the causes mentioned therein.

This the 18 day of April, 2024.

[redacted]

MATTHEW D[redacted]KENNEDY

STATE OF TENNESSEE
COUNTY OF DICKSON

Personally, appeared before me, the undersigned, a Notary Public in and for said County and State, the within named Complainant, **MATTHEW D[redacted]KENNEDY**, with whom I have become acquainted, and who acknowledges that he executed the within instrument for the purpose herein contained.

Witness my hand and seal this 18th day of April, 2024.

Bobbie Reynolds

NOTARY PUBLIC

MY COMMISSION EXPIRES: [redacted]

BOBBIE REYNOLDS
STATE OF TENNESSEE
NOTARY PUBLIC
My Commission Expires on
10/20/2026
DICKSON COUNTY