

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
AT FRANKLIN

FILED
WILLIAMSON COUNTY
CLERK & MASTER
2018 OCT 30 PM 1:42
FILED FOR ENTRY

FAWN [REDACTED] FENTON,
Plaintiff,

vs.

Docket: 47426

JEFFREY RYAN FENTON,
Defendant,

COPY

ANSWER & COUNTER-COMPLAINT FOR DIVORCE

Comes now the Defendant/Husband, Jeffrey Ryan Fenton, and files this Answer, and Counter-Complaint for Divorce as Follows:

ANSWER

1. Husband admits to the statistical information and jurisdictional information provided in paragraph 1 of the Wife's Complaint for Divorce, with the following exceptions:

HUSBAND:

- o. Date and Place of Birth: [REDACTED]
- q. Education level: HS
- z. [REDACTED]

2. Admitted.
3. Husband admits allegations of Irreconcilable Differences T.C.A. 36-4-101 a (14).
Husband denies allegations that he is guilty of Inappropriate Marital Conduct T.C.A. 36-4-101 a (11) and demands strict proof thereof.

WHEREFORE, HUSBAND PRAYS:

1. That Husband be awarded a Final Decree of Absolute Divorce on the grounds of Irreconcilable Differences or Inappropriate Marital Conduct;
2. For the Court to approve the Marital Dissolution Agreement, should the parties agree to enter into one.
3. For all right, title, and interest in the personal property already in the Husband's possession to be divested out of the Wife and vested in the Husband as his separate property;
4. For all right, title, and interest in the personal property already in the Wife's possession to be divested out of the Husband and vested in the Wife as her separate property;
5. For Wife to pay reasonable attorney's fees, to hire legal Counsel for Husband, as she promised, prior to mediation, trial, or any further litigation.
6. For the court to task costs, if necessary and award Husband his reasonable costs of prosecuting this matter, including a reasonable attorney's fees.
7. That the Husband be awarded alimony such that he can maintain his own residence, with a similar standard of living.
8. That the Husband be awarded the necessary funds for vocational training, to eventually be able to support himself again, regaining his independence.
9. That the Husband remain on the Wife's health insurance policy, to ensure no gap in mental or physical health care.
10. That the Husband be awarded such general relief to which the Husband may prove entitled including, but not limited to, those items prayed for above;
11. That the Wife be served with this suit and be required to answer as prescribed by law;
12. For the court to make an equitable distribution of the marital assets in this cause and deem non-marital property and assets separate.

Respectfully Submitted,



Jeffrey Ryan Fenton, pro se
1986 Sunny Side Drive
Brentwood, TN 37027
Phone: (615) 837-1300

STATE OF TENNESSEE)
COUNTY OF Williamson)

I, JEFFREY RYAN FENTON, being first duly sworn according to law, makes oath that I have read the foregoing Answer & Counter-Complaint for Divorce, knows the contents thereof, and that the same is true and correct to the best of my knowledge, information, and belief; that this Counter-Complaint is made for the causes mentioned therein; and that I am justly entitled to the relief therein sought.


JEFFREY RYAN FENTON

Sworn to and subscribed before me this 30 day of October, 2018.
Witness my hand and official seal.


Notary Public

My Commission Expires
July 6, 2020

My Commission Expires: _____



Payment Receipt

Williamson County - TN - Chancery

Paypal Transaction ID: 818217103S342200K
Date: 10/30/2018 1:57:31 PM
Payer Name: METICULOUS MARKETING LLC Jeffrey R Fenton
Payer Address:

Year	Receipt	CityCode	name	due
Docket No.: 47426	Fee Description: counter claim		Jeffrey R Fenton/Meticulous Mktng	\$100.00
			Percentage Fee	\$2.57
			Fixed Fee	\$0.30
Total:				\$102.87