

IN THE COURT OF COMMON PLEAS
DOMESTIC RELATIONS DIVISION
CUYAHOGA COUNTY, OHIO

ALLISON HORNER

Plaintiff,

-vs-

WILLIAM HORNER

Defendant.

:
:
:
:
:
:
:
:
:
:

CASE NO. DR 20 382383

JUDGE TONYA R. JONES

DEFENDANT'S ANSWER AND
COUNTERCLAIM FOR DIVORCE

Now comes Defendant, WILLIAM HORNER, by and through undersigned counsel, and respectfully submits this as and for his Answer to *Plaintiff's Complaint for Divorce*.

1. Defendant admits the allegations contained in Paragraph 1 of Plaintiff's Complaint for Divorce.
2. Defendant admits the allegations contained in Paragraph 2 of Plaintiff's Complaint for Divorce.
3. Defendant admits the allegations contained in Paragraph 3 of Plaintiff's Complaint for Divorce.
4. Defendant admits the allegations contained in Paragraph 4 of Plaintiff's Complaint for Divorce.
5. Defendant denies the allegations contained in Paragraph 5 of Plaintiff's Complaint for Divorce.
6. Defendant denies the allegations contained in Paragraph 6 of Plaintiff's Complaint for Divorce.

7. Defendant admits the allegations contained in Paragraph 7 of Plaintiff's Complaint for Divorce.

8. Defendant admits the allegations contained in Paragraph 8 of Plaintiff's Complaint For Divorce.

9. Defendant admits the allegations contained in Paragraph 9 of Plaintiff's Complaint for Divorce.

COUNTERCLAIM

Now comes Defendant, **WILLIAM HORNER**, by and through undersigned counsel, and for his Counterclaim against Plaintiff, **ALLISON HORNER**, states as follows:

10. Defendant has been a resident of the State of Ohio for more than six (6) months immediately preceding the filing of the Counterclaim.

11. Defendant states that he and Plaintiff were married in , Ohio on August 20, 2011. There are two (2) children born as issue of said marriage to wit: [REDACTED] Horner, born on [REDACTED] and [REDACTED] Horner, born on [REDACTED]

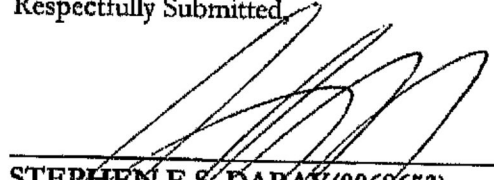
12. Defendant states that he and Plaintiff are incompatible by reason of which each is entitled to a divorce pursuant to R.C. 3105.01(K).

WHEREFORE, Defendant prays:

- a. That Plaintiff's Complaint be dismissed at her sole cost;
- b. That he be granted a complete and absolute divorce from Plaintiff;
- c. That he be granted a reasonable and equitable division of property;
- d. That the rights and responsibilities regarding the unemancipated children be allocated as determined to be in their best interest;
- e. That the Court award Defendant child and spousal support as it deems appropriate;
- f. That he be granted a reasonable amount for his attorney's fees and other expenses in

- the defense and prosecution of the within action;
- g. That the costs of this action be assessed against Plaintiff;
- h. That he be granted such other and further relief as this Court deems just and equitable.

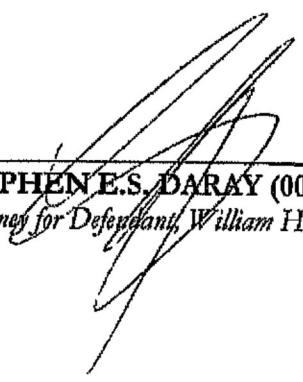
Respectfully Submitted,



STEPHEN E. S. DARAY(0068653)
DARAY LAW, LLC
905 Canterbury Road, Suite E
Westlake, OH 44145
(440) 482-0801 / Fax (440) 471-7100
steve@daraylaw.com
Attorney for Defendant, William Horner

CERTIFICATE OF SERVICE

A copy of the foregoing ANSWER AND COUNTERCLAIM was served upon Robert A. Marcis, Attorney for Plaintiff, via email at rmarcis@marcislaw.com on this 9th day of October 2020.



STEPHEN E.S. DARAY (0068653)
Attorney for Defendant, William Horner