

IN THE 29TH JUDICIAL DISTRICT
DISTRICT COURT WYANDOTTE COUNTY, KANSAS
CIVIL DEPARTMENT

In the Matter of the Marriage of

Petitioner

and

Respondent

Case No. _____
Division No. _____
Pursuant to K.S.A. Ch 23& 60

ANSWER AND COUNTER PETITION TO DIVORCE

COMES NOW the Respondent, _____, and for their Answer to Petitioner's
Petition for Divorce, alleges and states as follows:

1. Respondent denies each and every allegation in Petitioner's Petition unless hereinafter specifically admitted.
2. Respondent admits paragraphs _____ of Petitioner's Petition.
3. Respondent denies paragraphs _____ of Petitioner's Petition.
4. Respondent lacks information sufficient to respond to paragraphs _____ of Petitioner's Petition.

WHEREFORE, Respondent prays that Petitioner take naught by their Petition and for such other and further relief as the Court deems fair, just and equitable in the premises.

RESPONDENT'S COUNTER-PETITION FOR DIVORCE

COMES NOW the Respondent and for their Counter-Petition against the Petitioner, alleges and states as follows:

1. Respondent is now and has been an actual *bona fide* resident of the State of Kansas for sixty (60) days preceding Petitioner's filing of this action. Venue is properly placed in the District Court of Wyandotte County, Kansas.

2. Petitioner and Respondent were married on _____, _____, in _____, _____ (city, state).

3. There is/are _____ minor child(ren) born to the parties, namely:
_____, born in ____ / ____ (month/year).
_____, born in ____ / ____ (month/year).
_____, born in ____ / ____ (month/year).
_____, born in ____ / ____ (month/year).

4. Respondent has has not participated as a party, witness, or in any other capacity in any other litigation or custody proceeding in this or any other State, concerning custody of the child subject to this proceeding. _____ (if applicable).

5. Respondent has has no information of any custody proceeding pending in a court of this or any other State concerning the child subject to this proceeding. _____ (if applicable).

6. Respondent does does not know of any person not a party to this proceeding who has physical custody or claims to have physical custody or visitation rights with respect to the child subject to this proceeding. _____ (if applicable).
7. The places where the child have lived for the last five years and the persons with whom they have lived are as follows:

FROM DATE	UNTIL DATE	CITY, STATE	Name and Relationship of Adult(s) Living with Child, and Adult(s) Present Address

8. The parties should be awarded joint sole legal custody of their minor child, with Respondent having residential placement of the child, subject to Petitioner's rights of parenting time as set out in Respondent's Proposed Parenting Plan. If sole custody, state reasons for sole custody:

9. The Petitioner should be required to pay child support according to the Kansas Child Support Guidelines.

10. The Petitioner should should not be required to pay spousal maintenance to Respondent.
11. The parties are incompatible, one with the other, and because of the incompatibility, their marriage has been destroyed, and they can no longer live together as husband and wife. Therefore, the Respondent is entitled to an absolute decree of divorce from the Petitioner.
12. The parties have accumulated certain personal property, assets, and debts, which should be equitably divided upon the final hearing in this matter.

WHEREFORE, Respondent prays for a judgment of divorce from the Petitioner; for residential custody of the minor child of the parties; subject to Petitioner's rights of parenting time; for an order of child support; for spousal maintenance; for an equitable division of the personal property and debts of the parties; and for such other and further relief as the Court deems fair, just and equitable in the premises.

Respectfully Submitted By:

Signature

Name: _____

Address: _____

City/State/Zip: _____

Phone: _____

Email: _____