

STATE OF COLUMBIA
IN THE MONROE CIRCUIT COURT

IN RE THE MARRIAGE OF:)	
NICHOLAS B. TOWNSLEY)	Cause No. 13-663 F
)	
Petitioner)	
and)	
)	
BARBARA W. TOWNSLEY)	
)	
Respondent.)	

**VERIFIED PETITION FOR DISSOLUTION OF MARRIAGE
AND CUSTODY OF CHILDREN**

Comes now Nicholas B. Townsley and petitions this court for the dissolution of his marriage to the Respondent on the grounds of irretrievable breakdown of the marriage. In support hereof, Petitioner says:

(1) Petitioner has been domiciled in the State of Columbia for longer than six months, and a resident of 2412 Rockport Rd, Bayshore, Monroe County, Columbia, for longer than three months immediately preceding filing this petition.

(2) Respondent is a resident of 2412 Rockport Rd, Bayshore, Columbia.

(3) The parties were married on March 24, YR-6, in Monroe County, Columbia.

(4) The parties were separated on the date of the filing of this Petition.

(5) There were two children born of the marriage, Nicholas B. Townsley, Jr., and Danielle C. Townsley. The children are twins, born November 12, YR-6.

(6) The parties have acquired personal property, but not real property, during their marriage.

(7) There has been an irretrievable breakdown in the marriage with no hope of reconciliation.

(8) The Petitioner was born in Monroe County, Indiana, on February 16, YR-30, and is employed as an electrician.

(9) The Respondent was born in Monroe County, Columbia, January 23, YR-29 and is currently unemployed and in the custody of the Monroe County Jail on a charge of attempted murder of Petitioner.

WHEREFORE, Petitioner requests:

- (A) An order dissolving the marriage of the parties and directing that Respondent shall pay Petitioner's attorney's fees;
- (B) An equitable distribution of the property of the parties; and
- (C) For all other proper relief.

Respectfully submitted,

Date: Aug. 12, YR-1

James A. Schiff
James A. Schiff
Attorney for Petitioner
SCHIFF & SCHIFF
211 S Indiana Av
Bayshore, Columbia

VERIFICATION

I affirm under penalties of perjury that the foregoing representations are true and accurate to the best of my knowledge, information, and belief.

August 12, YR-1
Date:

Nicholas Townsley
Nicholas Townsley

State of Columbia)
County of Monroe) ss:

Subscribed to and sworn before me this 12th day of August, YR-1.

Dodie Bowman
Notary Public

My commission expires April 15, YR+1
My county of residence: Monroe.

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BARBARA W. TOWNSLEY)	
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Respondent.)	

**RESPONSE TO VERIFIED PETITION FOR DISSOLUTION OF MARRIAGE
AND VERIFIED COUNTER-PETITION FOR DISSOLUTION AND CUSTODY**

Barbara Townsley, Respondent herein, answers the petition as follows:

- (1) Respondent admits jurisdiction but generally denies the rest of the Petition.
- (2) There are two children born of the marriage, Nicholas B. Townsley, Jr., and Danielle C. Townsley. The children are twins, born November 12, YR-6.
- (3) Petitioner has subjected Respondent to persistent physical and mental abuse and cruelty throughout their marriage.

WHEREFORE, Respondent requests:

- (A) That Petitioner's request for relief be denied.
- (B) An order dissolving the marriage of the parties and directing that Petitioner shall pay Respondent's attorney's fees;
- (C) An order granting sole custody of the children to Respondent.
- (D) An order directing Petitioner to pay child support to Respondent.
- (E) An equitable distribution of the property of the parties; and
- (F) For all other proper relief.

Respectfully submitted,

Date: Aug. 22, YR-1

Regina Miller
Regina Miller
Attorney for Respondent

MILLER LAW OFFICE
201 N. Walnut
Bayshore, Columbia

VERIFICATION

I affirm under penalties of perjury that the foregoing representations are true and accurate to the best of my knowledge, information, and belief.

August 22, YR-1
Date:

Barbara Williams Townsley
Barbara W. Townsley

State of Columbia)
County of Monroe) ss:

Subscribed to and sworn before me this 22th day of August, YR-1.

Diana Watts
Notary Public

My commission expires June 2, YR-0
My county of residence: Monroe.