

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

JOANNA SULLIVAN
1315 Buck Run Rd.
Wilmington, Ohio 45177
DOB: 11/18/1985
Plaintiff,

vs.

BRENDAN SULLIVAN
1199 Durham Drive
Centerville, Ohio 45459
DOB: 02/23/1976
Defendant.

* CASE NO. 2024 DR 0547

* JUDGE WOOD

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* DEFENDANT'S ANSWER
* AND COUNTERCLAIM
* FOR DIVORCE

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Now comes the Defendant, by and through counsel, and hereby responds to
Plaintiff's Complaint for Divorce filed herein on August 22, 2024, as follows:

1. Defendant admits the allegations contained in paragraph one of Plaintiff's Complaint.
2. Defendant admits the allegations contained in paragraph two of the Plaintiff's Complaint.

3. Defendant admits the allegations contained in paragraph three and four of Plaintiff's Complaint.

4. Defendant admits that the parties are incompatible but denies the remaining allegations contained in paragraph five of Plaintiff's Complaint.

WHEREFORE, Defendant requests that Plaintiff's Complaint be dismissed with costs to Plaintiff.

COUNTERCLAIM FOR DIVORCE

Now comes the Defendant, Brendan Sullivan by and through his undersigned counsel, and for his Counterclaim for Divorce states as follows:

1. The Defendant has been a resident of the State of Ohio and the County of Greene for at least six (6) months preceding the filing of this Counterclaim.

2. The parties were married on October 19, 2019, in Wilmington, Ohio and one minor child has been born of the marriage, namely Lucie Hope Sullivan, born June 4, 2021. Plaintiff is not currently pregnant.

3. The Defendant states that the Plaintiff is guilty of gross neglect of duty, extreme cruelty, and that the parties are incompatible.

WHEREFORE, the Defendant demands the following relief:

A. That he be granted a Decree of Divorce.

B. That the real and personal property of the parties be divided equitably between them.

C. That he be awarded costs.

D. That he be awarded reasonable attorney fees and litigation expenses pursuant to Ohio Revised Code 3105.73(A).

E. That he be awarded such other relief as the Court may deem just and proper.

Respectfully submitted,

MCNAMEE LAW GROUP, LLC

/s/ Matthew J. Barbato

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing was electronically filed with the Montgomery County Clerk of Courts by using the ECF system which will send notice of electronic filing to the registered users, and it is hereby certified that the undersigned has sent a copy of the foregoing to all non-Electronic Filing participants via regular U.S. Mail, postage pre-paid, on this 4th day of September 2024.

/s/ Matthew J. Barbato

Matthew J. Barbato (0076058)