

VIRGINIA:

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

CHERI SMITH,

Complainant,

v.

WESLEY C. SMITH,

Defendant.

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Chancery No. 53360

ANSWER AND CROSS-BILL OF COMPLAINT

COMES NOW the Defendant/Cross-Complainant, Wesley C. Smith, ("the Husband") by counsel, and in response to Complainant, Cheri Smith's ("the Wife") Bill of Complaint and as his Cross-Bill of Complaint, states as follows:

ANSWER

1. The allegations contained in paragraph 1 of the Bill of Complaint are denied.
2. The allegations contained in paragraph 2 of the Bill of Complaint are admitted.
3. The allegations contained in paragraph 3 of the Bill of Complaint are admitted.
4. The allegations contained in paragraph 4 of the Bill of Complaint are admitted.
5. The allegations contained in paragraph 5 of the Bill of Complaint are admitted in part and denied in part. By way of further response, the Wife suffers from a mental illness which has greatly contributed to the breakdown of the marital relationship and affects the Wife's fitness as a parent for the parties' minor child.
6. The allegations contained in paragraph 6 of the Bill of Complaint are admitted.
7. The allegations contained in paragraph 7 of the Bill of Complaint are admitted.

