

**VIRGINIA:**

**IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY**

<b>CHERI SMITH,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>Chancery No. 53360</b>
	)	
<b>WESLEY C. SMITH,</b>	)	
	)	
<b>Defendant.</b>	)	

**AMENDED ANSWER AND AMENDED 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”) Amended Bill of Complaint and as his Amended Cross-Bill of Complaint, states as follows:

**ANSWER**

1. The allegations in paragraph 1 of the Amended Bill of Complaint are denied. By way of further response, the Wife has deserted the Husband and the marriage by moving out of the marital residence which has now been sold.
2. The allegations in paragraph 2 of the Amended Bill of Complaint are denied.
3. The allegations in paragraph 3 of the Amended Bill of Complaint are admitted.
4. The allegations in paragraph 4 of the Amended Bill of Complaint are admitted.
5. The allegations in paragraph 5 of the Amended Bill of Complaint are admitted in part and denied in part. By way of further response, the Husband denies the Wife is of sound mind as she suffers from one or more mental illnesses that have lead, in part, to the breakdown of the marriage, and severely impact her fitness as a parent for the parties’ minor child, Liam R.

