

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

PEDRO J. JIMENO MOREL,)	
)	
PETITIONER,)	
)	
vs.)	CIVIL ACTION FILE NO.:
)	22A-04596-11
CEAIR C. WYLIE DE JIMENO,)	
)	
RESPONDENT.)	

**RESPONDENT'S ANSWER AND COUNTERCLAIM
TO PETITIONER'S COMPLAINT FOR DIVORCE**

COMES NOW, **CEAIR C. WYLIE DE JIMENO**, Respondent in the above-styled action, by and through her Attorney of Record, Jarett R. Sliz, and files this her Answer and Counterclaim to Petitioner's Complaint for Divorce and shows this Court the following facts to wit:

1.

Respondent admits the allegations contained in Paragraph 1 of Petitioner's Complaint for Divorce.

2.

Respondent admits the allegations contained in Paragraph 2 of Petitioner's Complaint for Divorce.

3.

Respondent admits the allegations contained in Paragraph 3 of Petitioner's Complaint for Divorce.

4.

Respondent admits the allegations contained in Paragraph 4 of Petitioner's Complaint for

Divorce.

5.

Respondent admits the allegations contained in Paragraph 5 of Petitioner's Complaint for Divorce.

6.

Respondent admits the allegations contained in Paragraph 6 of Plaintiff's Complaint for Divorce.

7.

Respondent admits the allegations contained in Paragraph 7 of Petitioner's Complaint for Divorce.

8.

Respondent admits the allegations contained in Paragraph 8 of Petitioner's Complaint for Divorce.

9.

Respondent denies the allegations contained in Paragraph 9 of Petitioner's Complaint for Divorce.

10.

Respondent admits the allegations contained in Paragraph 10 of Petitioner's Complaint for Divorce.

11.

Respondent admits the allegations contained in Paragraph 11 of Petitioner's Complaint for Divorce.

12.

Respondent admits the allegations contained in Paragraph 12 of Petitioner's Complaint for Divorce.

13.

Respondent denies the allegations contained in Paragraph 12 of Petitioner's Complaint for Divorce. The property of the Plaintiff exceeds the sole item listed, to wit: 2019 Toyota Camry.

14.

Respondent admits the allegations contained in Paragraph 12 of Petitioner's Complaint for Divorce.

RESPONDENT'S COUNTERCLAIM

1.

The Petitioner is subject to the jurisdiction of this Court by virtue of the filing of this Complaint.

2.

The Respondent is entitled to a divorce from the Petitioner upon the following statutory grounds:

- a) Adultery by the Petitioner;
- b) Cruel Treatment of the Respondent by the Petitioner, to wit: physical domestic violence, as well as mental pain; and
- c) The marriage is irretrievably broken with no hope of reconciliation.

3.

The Respondent seeks an equitable distribution of the assets acquired by the parties during the term of their marriage.

4.

The Respondent shows that all property acquired by the Respondent before the marriage, or by gift or inheritance during the marriage, should be awarded to her as her separate property.

5.

The Respondent seeks an equitable allocation of the debts incurred by the parties during the term of their marriage.

6.

The Respondent seeks attorney's fees for having to defend this action for Divorce.

7.

The Respondent seeks any and all further relief that the Court deems just and proper under the facts and circumstances of this case.

8.

The Respondent seeks the immediate return of her cellular telephone and back up storage device for her computers and phone.

Respectfully submitted this 1th day of July, 2022.

Sliz/Bramblett and Associates, LLC.



Jarett R. Sliz
Attorney for Respondent
Georgia State Bar No. 556835

280 Constitution Blvd.
P.O. Box 747
Lawrenceville, Georgia 30046

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

PEDRO J. JIMENO MOREL,)
)
 PETITIONER,)
)
 vs.) CIVIL ACTION FILE NO.:
) 22A-04596-11
)
 CEAIR C. WYLIE DE JIMENO,)
)
 RESPONDENT.)

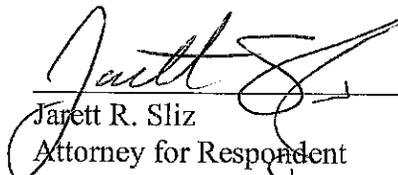
CERTIFICATE OF SERVICE

This is to certify that I have this day served upon counsel a copy of the foregoing *Respondent's Answer and Counterclaim to Petitioner's Complaint for Divorce* by depositing in the U.S. Mail a copy of same in a properly addressed envelope with adequate postage thereon to:

Attn: Afiya Hinkson
The Hinkson Firm, LLC.
4707 Ashford Dunwoody Road
Unit# 467861
Atlanta, Georgia 30338

This the 7th day of July, 2022.

Sliz/Bramblett and Associates, LLC.



Jarett R. Sliz
Attorney for Respondent
Georgia State Bar No. 556835

280 Constitution Blvd.
P.O. Box 747
Lawrenceville, Georgia 30046

STATE OF GEORGIA

COUNTY OF Gwinnett

VERIFICATION

Personally appeared before me, the undersigned officer duly authorized to administer oaths, Air C. Wylie de Jimeno who upon first duly sworn, states and deposes under penalty of perjury, that the facts contained in the foregoing are true and correct to the best of my knowledge, information and belief.

Air C. Wylie de Jimeno

Sworn to and subscribed before me this

1th day of JULY, 2022.

Jessica Shultz
Notary Public

