

R. ALLAN ATKINS,
Plaintiff

VS.

TAMMY JO McDONALD ATKINS,
Defendant

FILED
WILLIAMSON COUNTY
CLERK & MASTER

2011 NOV 22 PM 3:08
IN THE CHANCERY
COURT FOR WILLIAMSON
COUNTY, TENNESSEE
ENTERED

No. 40411

COMPLAINT FOR DIVORCE

1. Plaintiff, R. Allan Atkins, (hereinafter called "Husband") is married to Defendant (hereinafter called "Wife"). The following is the statistical information pertaining to said parties required by T.C.A. 36-4-106:

WIFE:

- a. Full maiden name of Wife: Tammy Jo McDonald
- b. Race: Caucasian
- c. Residence address: [REDACTED]
- d. Length of residence at above address: 4 years
- e. Date and place of birth: 02-06-70; TN
- f. Number of previous marriages: 1
- g. Member of the Armed Services of the United States: no
- h. Employed: self

HUSBAND:

- i. Full name of Husband: R. Allan Atkins
- j. Race: Caucasian
- k. Residence address: [REDACTED]
- l. Length of residence at above address: 4 years
- m. Date and place of birth: 03-28-69; TN
- n. Number of previous marriages: 0

R. ALLAN ATKINS,
Plaintiff

VS.

TAMMY JO McDONALD ATKINS,
Defendant

FILED
WILLIAMSON COUNTY
CLERK & MASTER

2011 NOV 22 PM 3:08
IN THE CHANCERY
COURT FOR WILLIAMSON
COUNTY, TENNESSEE
ENTERED

No. 40411

COMPLAINT FOR DIVORCE

1. Plaintiff, R. Allan Atkins, (hereinafter called "Husband") is married to Defendant (hereinafter called "Wife"). The following is the statistical information pertaining to said parties required by T.C.A. 36-4-106:

WIFE:

- a. Full maiden name of Wife: Tammy Jo McDonald
- b. Race: Caucasian
- c. Residence address: [REDACTED]
- d. Length of residence at above address: 4 years
- e. Date and place of birth: 02-06-70; TN
- f. Number of previous marriages: 1
- g. Member of the Armed Services of the United States: no
- h. Employed: self

HUSBAND:

- i. Full name of Husband: R. Allan Atkins
- j. Race: Caucasian
- k. Residence address: [REDACTED]
- l. Length of residence at above address: 4 years
- m. Date and place of birth: 03-28-69; TN
- n. Number of previous marriages: 0

- o. Member of the Armed Services of the United States: no
- p. Employed: self
- q. Date and place of marriage of the parties: 04-26-98;
Williamson County, TN
- r. Date of separation of the parties: 11-22-11
- s. Residence of the parties at the time of their separation:
[REDACTED]
- t. Minor children born of this marriage and their dates of birth:
[REDACTED]
- u. Grounds for divorce relied on by Plaintiff: Irreconcilable
Differences
- v. Description of any other litigation concerning the custody of
these children in this or any other state in which either
party has participated: None
- w. Do you currently have an Order of Protection in force in this
Court or any other Court? yes

II.

The Husband would show unto the Court that the parties are experiencing irreconcilable differences in their marriage.

III.

The Husband would show unto the Court that the parties anticipate entering into a Marital Dissolution Agreement and Permanent Parenting Plan. The Husband would ask the Court to approve the anticipated Agreement and Parenting Plan and incorporate the same into a Final Decree of Divorce in this cause.

IV.

The Husband would show unto the Court that the parties are the parents of one minor child, [REDACTED] whose date of birth is [REDACTED]. He would show unto the Court that said child currently resides with the parties at [REDACTED]

[REDACTED], where they have resided for four years. Prior thereto, the child resided with the parties at [REDACTED]

[REDACTED] for approximately six years. The Husband would further show that he has not participated in other litigation concerning the custody of this minor child; he does not have any information of any other custody proceeding concerning this child in any Court of this or any other jurisdiction; and he does not know of any person not a party to this proceeding who has physical custody of the child or who has claimed to have custody or visitation rights with respect to said child.

WHEREFORE, HUSBAND PRAYS:

1. That proper process issue and that the Wife be served, but that the Wife not be required to answer.
2. That the statutory injunctions issue in this cause.
3. That the Husband be awarded an absolute divorce from the Wife and restored to all the rights and privileges of an unmarried person.
4. That the Court approve the anticipated Marital Dissolution Agreement and Permanent Parenting Plan and incorporate the same into the Final Decree of Divorce to be entered in this cause.
5. That the Husband have such other further and general relief to which he may be entitled.

Respectfully submitted,

Rose Palermo
Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

TMZ

IN THE CHANCERY COURT OF WILLIAMSON COUNTY, TENNESSEE

R. Allan Atkins
vs
Tammy J. Atkins

FILED
WILLIAMSON COUNTY
CLERK
2011 NOV 22 PM 3:09
NO. 40411-11-22-11
ENTERED

TEMPORARY RESTRAINING ORDER


Pursuant to T.C.A. § 36-4-106 (d), it is hereby ORDERED as follows:

1. Each party is hereby restrained and enjoined from transferring, assigning, borrowing against, concealing or in any way dissipating or disposing of any marital property without permission of the Court or by consent order.
2. Expenditures from current income to maintain the marital standard of living, usual and ordinary costs of operating a business, and reasonable costs of this cause are not restricted by this injunction. Each party shall maintain records of all such expenditures and provide copies to the other party upon request.
3. Each party is restrained and enjoined from voluntarily canceling, modifying, terminating, assigning or allowing to lapse for non-payment of premiums any insurance policy of a party or in which a party or child of the parties has an interest without permission of the Court or by consent order.
4. Each party is restrained and enjoined from harassing, threatening, assaulting or abusing the other party and from making disparaging remarks about the other party to or in the presence of any children of the parties or to an employer of a party.
5. Each party is restrained and enjoined from hiding, destroying or spoiling, in whole or in part, any evidence electronically stored or on computer hard drives or other memory storage devices
6. Each party is restrained and enjoined from relocating any children of the parties outside the State of Tennessee or for more than 100 miles from the marital residence without permission of the Court or by consent order, except in the case of a removal based upon a well-founded fear of physical abuse against either the fleeing parent or the child. In such latter case, upon the request of the non-relocating parent, the Court will conduct an expedited hearing to determine the reasonableness of the relocation and to make such other orders as appropriate.

Nothing herein shall preclude the Court from revising, modifying or expanding the terms of this order pursuant to T.R.C.P. 65.07.

Entered this 22 day of Nov, 2011.

Clerk's Certificate of Service


Clerk
James G. Martin III

I hereby certify that a true and exact copy of the foregoing Order has been mailed or delivered to all parties and/or counsel of record.

This the 22 day of Nov, 2011.


Clerk and Master

FILED
WILLIAMSON COUNTY
COUNTY, MASTER

[Handwritten signature]

COUNTER-COMPLAINT

Defendant now assumes the role of Counter-Complainant and would show unto the Court as follows:

1. She adopts herein all the statistical information as contained in the Complaint filed against her.

2. That these parties are unable to live together successfully as husband and wife.

3. Therefore, she charges that the Defendant has been guilty of such inappropriate marital conduct as renders further cohabitation unsafe and improper; and that the parties have suffered irreconcilable differences pursuant to T.C.A. §36-4-101(14).

PREMISES CONSIDERED, COUNTER-COMPLAINANT PRAYS:

1. That a copy of this Answer and Counter-Complaint be served on the Counter-Defendant requiring him to appear and answer, but his oath is expressly waived.

2. That at the final hearing of this cause, the parties be granted an Absolute Divorce and restored to all the rights and privileges of unmarried persons.

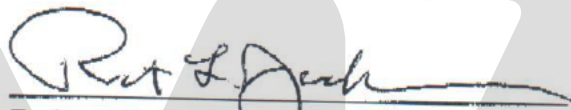
3. That she be awarded the care, custody and control of the minor child.

4. That the Court make an equitable distribution of the marital estate and apportion the marital debt.

5. That the Court approve the Parenting Plan to be presented by the mother.
6. That she be awarded alimony and child support *pendente lite* and permanent.
7. That she be awarded her reasonable attorney fees.
8. For general relief.

Respectfully submitted,

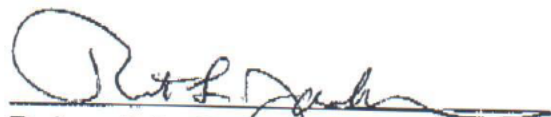
*Jackson, Kweiler, McKinney,
Warden, Lewis & Hayes*



Robert L. Jackson, # 2486
Attorney for Mrs. Atkins
214 Second Avenue North
One Washington Square, Suite 103
Nashville, Tennessee 37201
Telephone: (615) 256-2602
Facsimile: (615) 242-5967

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been sent via U.S. Mail, postage pre-paid, to Rose Palermo, Attorney for the Complainant, at [REDACTED] on this the 29th day of November, 2011.




Robert L Jackson

STATE OF TENNESSEE

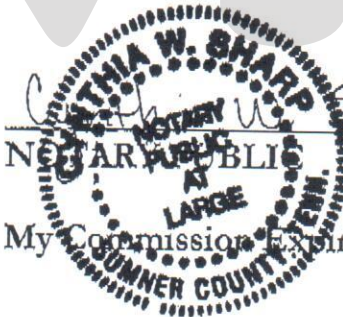
COUNTY OF DAVIDSON

Tammy Jo Atkins, after first being duly sworn, makes oath that the statements contained in the foregoing are true to the best of her knowledge, information and belief; that she brings this Counter-Complaint for Divorce not out of levity or by collusion with the Defendant, but in sincerity and truth, and for the causes mentioned in the bill.



Tammy Jo Atkins

Sworn to and subscribed before me this 29th day of November, 2011.



Cynthia W. Sharp
My Commission Expires: 3/2/15

STATE OF TENNESSEE
SUMMONS

FILED
WILLIAMSON COUNTY
CLERK & MASTER

2011 NOV 22 PM 3:08

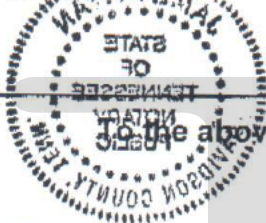
IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
ENTERED

R. ALLAN ATKINS,
Plaintiff

CIVIL ACTION NO. 40411

vs.

TAMMY JO McDONALD ATKINS,
Defendant



To the above named Defendant:

Tammy Jo McDonald Atkins

You are hereby summoned and required to serve upon Rose Palermo, plaintiff's attorney, whose address is [REDACTED], an answer to the complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Witnessed and issued, Elaine B. Beeler, Clerk and Master for said Court at office this 22 day of Nov, 2011.

Pauline Maxwell
Clerk & Master

NOTICE:

To the defendant(s): Tennessee law provides a four thousand dollar (\$4,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the terms you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list, including docket number, to: Clerk and Master, P.O. Box 1666, Franklin, TN 37065.

RETURN TO CLERK & MASTER

Atty

STATE OF TENNESSEE
SUMMONS

FILED
WILLIAMSON COUNTY
CLERK & MASTER

2011 NOV 29 PM 2:38

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

R. Allan Atkins
Plaintiff

Plaintiff

vs.

Tammy Jo McDonald Atkins
Defendant

Defendant

Defendant

CIVIL ACTION NO. 40411

Service By:

☐ Sheriff

☐ Attorney

☐ Sec. Of State

☐ Comm. Of Insurance

☒ Personal Service

To the above named Defendant:

You are hereby summoned and required to serve upon Robert L. Jackson, plaintiff's attorney, whose address is [REDACTED] an answer to the complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Witnessed and issued, Elnora B. Seeler, Clerk and Master for said Court at office this 29 day of Nov 2011.



Clerk & Master

Sara B. Atkins

To the defendant(s): Tennessee law provides a four thousand dollar (\$4,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the terms you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list, including docket number, to: Clerk and Master, P.O. Box 1666, Franklin, TN 37065.

RETURN TO CLERK & MASTER

Atty

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

FILED
WILLIAMSON COUNTY
CLERK MASTER
2011 DEC -5 AM 9:05

R. ALLAN ATKINS,
Husband

VS.

TAMMY JO McDONALD ATKINS,
Wife.

ENTERED

NO. 40411

HUSBAND'S ANSWER TO WIFE'S COUNTER COMPLAINT
FOR ABSOLUTE DIVORCE

Comes the Husband, R. Allan Atkins, for answer to the Counter Complaint for Absolute Divorce filed against him in this cause, who would show unto the Court the following:

1. The Husband admits the statistical information contained in paragraph 1 of the Wife's Counter Complaint.

2. The Husband admits the allegations contained in paragraph 2 of the Wife's Counter Complaint.

3. With regard to paragraph 3 of the Wife's Counter Complaint, the Husband admits that the parties are experiencing irreconcilable differences in their marriage, but he denies that he is guilty of inappropriate marital conduct.

AFFIRMATIVE DEFENSE

Pursuant to Tennessee Code Annotated Section 36-4-120, the Husband avers the affirmative defense to the charges

SBW

brought against him, and hereby avers that the ill conduct of the Wife was a justifiable cause for any conduct complained of against him.

Now having fully answered, the Husband prays that the Counter Complaint for Absolute Divorce filed against him in this cause be dismissed, with the costs taxed to the Wife.

Respectfully submitted,



Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed to Robert L. Jackson, Attorney for Wife, [REDACTED]

[REDACTED] on this 2 day of December, 2011.


Rose Palermo

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

FILED
WILLIAMSON COUNTY
CLERK
2011 DEC -6 PM 3:27

R. ALLAN ATKINS,
Husband

VS.

TAMMY JO McDONALD ATKINS,
Wife.

ENTERED _____

NO. 40411

MOTION

Comes the Husband, R. Allan Atkins, who most respectfully moves this Honorable Court for leave to file an Amended and Supplemental Complaint for Divorce in this cause. A copy of the Husband's proposed Amended and Supplemental Complaint is attached hereto.

Respectfully submitted,

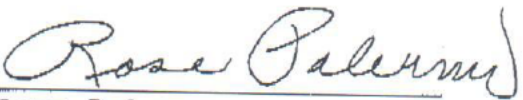


Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

900
21

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was
mailed to Robert L. Jackson, Attorney for Wife [REDACTED]
[REDACTED] on
this 2 day of December, 2011.


Rose Palermo

THIS MOTION IS EXPECTED TO BE HEARD ON TUESDAY,
DECEMBER 20, 2011, AT 9:00 A.M.

TIMZ

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

R. ALLAN ATKINS,
Husband

VS.

TAMMY JO McDONALD ATKINS,
Wife.

NO. 40411

AMENDED AND SUPPLEMENTAL COMPLAINT FOR DIVORCE

Comes the Husband, R. Allan Atkins, in support of his Amended and Supplemental Complaint for Absolute Divorce, who would show unto the Court the following:

1. He adopts the statistical information contained in paragraph one of his original Complaint for Absolute Divorce and incorporates the same by reference as if fully copied verbatim herein.

2. He would show unto the Court that the Wife is guilty of such inappropriate marital conduct as renders further cohabitation unsafe and improper.

3. He would show unto the Court that the parties are experiencing irreconcilable differences in their marriage.

4. The Husband would show unto the Court that the parties are the parents of one minor child, [REDACTED], whose date of birth is [REDACTED]. He would show unto the Court that said child currently resides in the marital home located at [REDACTED] [REDACTED] where they have resided for four years. Prior thereto, the child resided with the parties at [REDACTED] for

approximately six years. The Husband would further show that he has not participated in other litigation concerning the custody of this minor child; he does not have any information of any other custody proceeding concerning this child in any Court of this or any other jurisdiction; and he does not know of any person not a party to this proceeding who has physical custody of the child or who has claimed to have custody or visitation rights with respect to said child. The Husband would further show unto the Court that the parties are both fit and proper persons to be designated joint residential custodians of said child.

5. The Husband would further show unto the Court that the parties have accumulated certain real and personal property during their marriage, as well as certain debts.

WHEREFORE, HUSBAND PRAYS:

1. That the Wife be served with this Amended and Supplemental Complaint for Absolute Divorce by mailing a copy of the same to her attorney of record, Robert L. Jackson, at his address of [REDACTED]

[REDACTED] and that the Wife be required to answer within the time prescribed by law, but the oath to her answer is waived.

2. That upon a hearing, the Husband be awarded an absolute divorce from the Wife and that he be restored to all the rights and privileges of an unmarried person, and that the bonds of matrimony heretofore existing between the parties be perpetually dissolved.

3. That the parties be designated joint residential custodians of their minor child, with child support to be

established pursuant to the Tennessee Child Support Guidelines or as otherwise deemed appropriate by the Court.

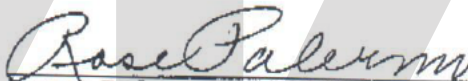
4. That the Husband be required to maintain health insurance coverage for the benefit of the parties' minor child, with all uncovered medical, dental, orthodontic, eye care, and other health-related expenses being paid by the parties equally.

5. That the Court make an equitable division of all of the real and personal property of the parties, as well as their debts.

6. That the Husband be awarded his attorney's fees, and that the Wife be required to pay the Court costs incurred in this cause.

7. That the Husband have such other further and general relief to which he may be entitled.

Respectfully submitted,



Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

CERTIFICATE OF SERVICE

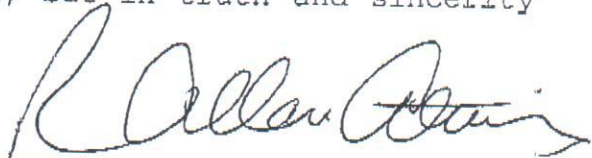
I hereby certify that a copy of the foregoing was mailed to Robert L. Jackson, Attorney for Wife, [REDACTED] on this 3 day of December, 2011.



Rose Palermo

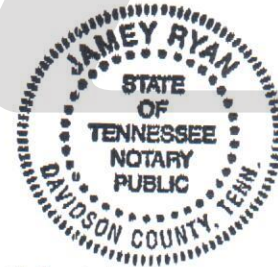
STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

R. ALLAN ATKINS, after being first duly sworn, makes oath and states that he has read the foregoing Amended and Supplemental Complaint for Absolute Divorce and that the facts and statements contained therein are true and correct to the best of his knowledge, information and belief, and that the Amended and Supplemental Complaint for Absolute Divorce is not made out of levity or by collusion with the Wife, but in truth and sincerity for the causes mentioned therein.


R. ALLAN ATKINS

Sworn to and subscribed before me this 5th day of
December, 2011.


NOTARY PUBLIC
My Comm. Expires: _____



My Commission Expires JULY 6, 2015

- o. Member of the Armed Services of the United States: no
- p. Employed: self
- q. Date and place of marriage of the parties: 04-26-98;
Williamson County, TN
- r. Date of separation of the parties: 11-22-11
- s. Residence of the parties at the time of their separation:
[REDACTED]
- t. Minor children born of this marriage and their dates of birth:
[REDACTED]
- u. Grounds for divorce relied on by Plaintiff: Irreconcilable
Differences
- v. Description of any other litigation concerning the custody of
these children in this or any other state in which either
party has participated: None
- w. Do you currently have an Order of Protection in force in this
Court or any other Court? yes

II.

The Husband would show unto the Court that the parties are experiencing irreconcilable differences in their marriage.

III.

The Husband would show unto the Court that the parties anticipate entering into a Marital Dissolution Agreement and Permanent Parenting Plan. The Husband would ask the Court to approve the anticipated Agreement and Parenting Plan and incorporate the same into a Final Decree of Divorce in this cause.

IV.

The Husband would show unto the Court that the parties are the parents of one minor child, [REDACTED] whose date of birth is [REDACTED]. He would show unto the Court that said child currently resides with the parties at [REDACTED]

[REDACTED], where they have resided for four years. Prior thereto, the child resided with the parties at [REDACTED]

[REDACTED] for approximately six years. The Husband would further show that he has not participated in other litigation concerning the custody of this minor child; he does not have any information of any other custody proceeding concerning this child in any Court of this or any other jurisdiction; and he does not know of any person not a party to this proceeding who has physical custody of the child or who has claimed to have custody or visitation rights with respect to said child.

WHEREFORE, HUSBAND PRAYS:

1. That proper process issue and that the Wife be served, but that the Wife not be required to answer.
2. That the statutory injunctions issue in this cause.
3. That the Husband be awarded an absolute divorce from the Wife and restored to all the rights and privileges of an unmarried person.
4. That the Court approve the anticipated Marital Dissolution Agreement and Permanent Parenting Plan and incorporate the same into the Final Decree of Divorce to be entered in this cause.
5. That the Husband have such other further and general relief to which he may be entitled.

Respectfully submitted,

Rose Palermo
Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

TMZ

IN THE CHANCERY COURT OF WILLIAMSON COUNTY, TENNESSEE

R. Allan Atkins
vs
Tammy J. Atkins

FILED
WILLIAMSON COUNTY
CLERK
2011 NOV 22 PM 3:09
NO. 40411-22-11
ENTERED

TEMPORARY RESTRAINING ORDER


Pursuant to T.C.A. § 36-4-106 (d), it is hereby ORDERED as follows:

1. Each party is hereby restrained and enjoined from transferring, assigning, borrowing against, concealing or in any way dissipating or disposing of any marital property without permission of the Court or by consent order.
2. Expenditures from current income to maintain the marital standard of living, usual and ordinary costs of operating a business, and reasonable costs of this cause are not restricted by this injunction. Each party shall maintain records of all such expenditures and provide copies to the other party upon request.
3. Each party is restrained and enjoined from voluntarily canceling, modifying, terminating, assigning or allowing to lapse for non-payment of premiums any insurance policy of a party or in which a party or child of the parties has an interest without permission of the Court or by consent order.
4. Each party is restrained and enjoined from harassing, threatening, assaulting or abusing the other party and from making disparaging remarks about the other party to or in the presence of any children of the parties or to an employer of a party.
5. Each party is restrained and enjoined from hiding, destroying or spoiling, in whole or in part, any evidence electronically stored or on computer hard drives or other memory storage devices
6. Each party is restrained and enjoined from relocating any children of the parties outside the State of Tennessee or for more than 100 miles from the marital residence without permission of the Court or by consent order, except in the case of a removal based upon a well-founded fear of physical abuse against either the fleeing parent or the child. In such latter case, upon the request of the non-relocating parent, the Court will conduct an expedited hearing to determine the reasonableness of the relocation and to make such other orders as appropriate.

Nothing herein shall preclude the Court from revising, modifying or expanding the terms of this order pursuant to T.R.C.P. 65.07.

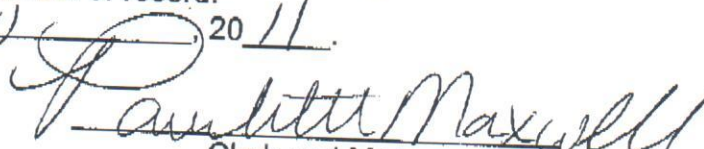
Entered this 22 day of Nov, 2011.

Clerk's Certificate of Service


Clerk
James G. Martin III

I hereby certify that a true and exact copy of the foregoing Order has been mailed or delivered to all parties and/or counsel of record.

This the 22 day of Nov, 2011.


Clerk and Master

FILED
WILLIAMSON COUNTY
COUNTY, MASTER

Case No. 40411

She admits the remaining sentences in this paragraph.

COUNTER-COMPLAINT

Defendant now assumes the role of Counter-Complainant and would show unto the Court as follows:

1. She adopts herein all the statistical information as contained in the Complaint filed against her.

2. That these parties are unable to live together successfully as husband and wife.

3. Therefore, she charges that the Defendant has been guilty of such inappropriate marital conduct as renders further cohabitation unsafe and improper; and that the parties have suffered irreconcilable differences pursuant to T.C.A. §36-4-101(14).

PREMISES CONSIDERED, COUNTER-COMPLAINANT PRAYS:

1. That a copy of this Answer and Counter-Complaint be served on the Counter-Defendant requiring him to appear and answer, but his oath is expressly waived.

2. That at the final hearing of this cause, the parties be granted an Absolute Divorce and restored to all the rights and privileges of unmarried persons.

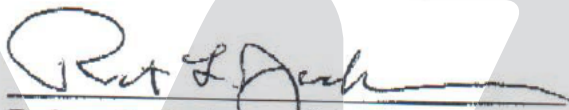
3. That she be awarded the care, custody and control of the minor child.

4. That the Court make an equitable distribution of the marital estate and apportion the marital debt.

5. That the Court approve the Parenting Plan to be presented by the mother.
6. That she be awarded alimony and child support *pendente lite* and permanent.
7. That she be awarded her reasonable attorney fees.
8. For general relief.

Respectfully submitted,

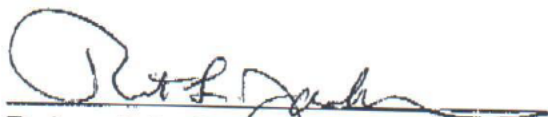
*Jackson, Kweller, McKinney,
Warden, Lewis & Hayes*



Robert L. Jackson, # 2486
Attorney for Mrs. Atkins
214 Second Avenue North
One Washington Square, Suite 103
Nashville, Tennessee 37201
Telephone: (615) 256-2602
Facsimile: (615) 242-5967

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been sent via U.S. Mail, postage pre-paid, to Rose Palermo, Attorney for the Complainant, at [REDACTED] on this the 29th day of November, 2011.




Robert L Jackson

STATE OF TENNESSEE

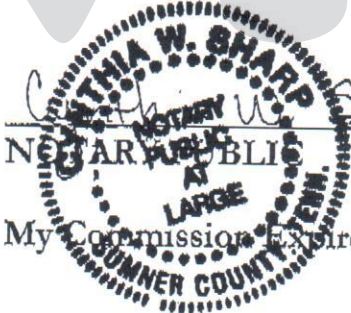
COUNTY OF DAVIDSON

Tammy Jo Atkins, after first being duly sworn, makes oath that the statements contained in the foregoing are true to the best of her knowledge, information and belief; that she brings this Counter-Complaint for Divorce not out of levity or by collusion with the Defendant, but in sincerity and truth, and for the causes mentioned in the bill.



Tammy Jo Atkins

Sworn to and subscribed before me this 29th day of November, 2011.



Cynthia W. Sharp
My Commission Expires: 3/2/15

STATE OF TENNESSEE
SUMMONS

FILED
WILLIAMSON COUNTY
CLERK & MASTER

2011 NOV 22 PM 3:08

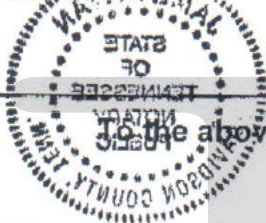
IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
ENTERED

R. ALLAN ATKINS,
Plaintiff

CIVIL ACTION NO. 40411

vs.

TAMMY JO McDONALD ATKINS,
Defendant



To the above named Defendant:

Tammy Jo McDonald Atkins

You are hereby summoned and required to serve upon Rose Palermo, plaintiff's attorney, whose address is [REDACTED], an answer to the complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Witnessed and issued, Elaine B. Beeler, Clerk and Master for said Court at office this 22 day of Nov, 2011.

Pauline Maxwell
Clerk & Master

NOTICE:

To the defendant(s): Tennessee law provides a four thousand dollar (\$4,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the terms you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list, including docket number, to: Clerk and Master, P.O. Box 1666, Franklin, TN 37065.

RETURN TO CLERK & MASTER

Atty

STATE OF TENNESSEE
SUMMONS

FILED
WILLIAMSON COUNTY
CLERK & MASTER

2011 NOV 29 PM 2:38

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

R. Allan Atkins
Plaintiff

Plaintiff

vs.

Tammy Jo McDonald Atkins
Defendant

Defendant

Defendant

CIVIL ACTION NO. 40411

Service By:

☐ Sheriff

☐ Attorney

☐ Sec. Of State

☐ Comm. Of Insurance

☒ Personal Service

To the above named Defendant:

You are hereby summoned and required to serve upon Robert L. Jackson, plaintiff's attorney, whose address is [REDACTED] an answer to the complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Witnessed and issued, Elaine B. Seeler, Clerk and Master for said Court at office this 29 day of Nov 2011



Clerk & Master

Sara B. Atkins

To the defendant(s): Tennessee law provides a four thousand dollar (\$4,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the terms you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Mail list, including docket number, to: Clerk and Master, P.O. Box 1666, Franklin, TN 37065.

RETURN TO CLERK & MASTER

Atty

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

FILED
WILLIAMSON COUNTY
CLERK MASTER
2011 DEC -5 AM 9:05

R. ALLAN ATKINS,
Husband

VS.

TAMMY JO McDONALD ATKINS,
Wife.

ENTERED

NO. 40411

**HUSBAND'S ANSWER TO WIFE'S COUNTER COMPLAINT
FOR ABSOLUTE DIVORCE**

Comes the Husband, R. Allan Atkins, for answer to the Counter Complaint for Absolute Divorce filed against him in this cause, who would show unto the Court the following:

1. The Husband admits the statistical information contained in paragraph 1 of the Wife's Counter Complaint.
2. The Husband admits the allegations contained in paragraph 2 of the Wife's Counter Complaint.

3. With regard to paragraph 3 of the Wife's Counter Complaint, the Husband admits that the parties are experiencing irreconcilable differences in their marriage, but he denies that he is guilty of inappropriate marital conduct.

AFFIRMATIVE DEFENSE

Pursuant to Tennessee Code Annotated Section 36-4-120, the Husband avers the affirmative defense to the charges

SBW

brought against him, and hereby avers that the ill conduct of the Wife was a justifiable cause for any conduct complained of against him.

Now having fully answered, the Husband prays that the Counter Complaint for Absolute Divorce filed against him in this cause be dismissed, with the costs taxed to the Wife.

Respectfully submitted,



Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed to Robert L. Jackson, Attorney for Wife [REDACTED]

[REDACTED] on this 2 day of December, 2011.


Rose Palermo

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

FILED
WILLIAMSON COUNTY
CLERK
2011 DEC -6 PM 3:27

R. ALLAN ATKINS,
Husband

VS.

TAMMY JO McDONALD ATKINS,
Wife.

ENTERED

NO. 40411

MOTION

Comes the Husband, R. Allan Atkins, who most respectfully moves this Honorable Court for leave to file an Amended and Supplemental Complaint for Divorce in this cause. A copy of the Husband's proposed Amended and Supplemental Complaint is attached hereto.

Respectfully submitted,

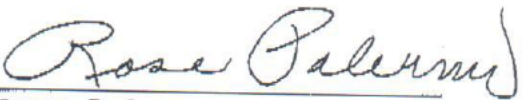


Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

900
21

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was
mailed to Robert L. Jackson, Attorney for Wife [REDACTED]
[REDACTED] on
this 2 day of December, 2011.


Rose Palermo

THIS MOTION IS EXPECTED TO BE HEARD ON TUESDAY,
DECEMBER 20, 2011, AT 9:00 A.M.

TMZ

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE

R. ALLAN ATKINS,
Husband

VS.

TAMMY JO McDONALD ATKINS,
Wife.

NO. 40411

AMENDED AND SUPPLEMENTAL COMPLAINT FOR DIVORCE

Comes the Husband, R. Allan Atkins, in support of his Amended and Supplemental Complaint for Absolute Divorce, who would show unto the Court the following:

1. He adopts the statistical information contained in paragraph one of his original Complaint for Absolute Divorce and incorporates the same by reference as if fully copied verbatim herein.

2. He would show unto the Court that the Wife is guilty of such inappropriate marital conduct as renders further cohabitation unsafe and improper.

3. He would show unto the Court that the parties are experiencing irreconcilable differences in their marriage.

4. The Husband would show unto the Court that the parties are the parents of one minor child, [REDACTED], whose date of birth is [REDACTED]. He would show unto the Court that said child currently resides in the marital home located at [REDACTED] [REDACTED] where they have resided for four years. Prior thereto, the child resided with the parties at [REDACTED] for

approximately six years. The Husband would further show that he has not participated in other litigation concerning the custody of this minor child; he does not have any information of any other custody proceeding concerning this child in any Court of this or any other jurisdiction; and he does not know of any person not a party to this proceeding who has physical custody of the child or who has claimed to have custody or visitation rights with respect to said child. The Husband would further show unto the Court that the parties are both fit and proper persons to be designated joint residential custodians of said child.

5. The Husband would further show unto the Court that the parties have accumulated certain real and personal property during their marriage, as well as certain debts.

WHEREFORE, HUSBAND PRAYS:

1. That the Wife be served with this Amended and Supplemental Complaint for Absolute Divorce by mailing a copy of the same to her attorney of record, Robert L. Jackson, at his address of [REDACTED]

[REDACTED] and that the Wife be required to answer within the time prescribed by law, but the oath to her answer is waived.

2. That upon a hearing, the Husband be awarded an absolute divorce from the Wife and that he be restored to all the rights and privileges of an unmarried person, and that the bonds of matrimony heretofore existing between the parties be perpetually dissolved.

3. That the parties be designated joint residential custodians of their minor child, with child support to be

established pursuant to the Tennessee Child Support Guidelines or as otherwise deemed appropriate by the Court.

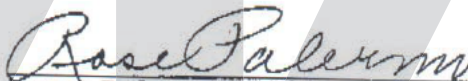
4. That the Husband be required to maintain health insurance coverage for the benefit of the parties' minor child, with all uncovered medical, dental, orthodontic, eye care, and other health-related expenses being paid by the parties equally.

5. That the Court make an equitable division of all of the real and personal property of the parties, as well as their debts.

6. That the Husband be awarded his attorney's fees, and that the Wife be required to pay the Court costs incurred in this cause.

7. That the Husband have such other further and general relief to which he may be entitled.

Respectfully submitted,



Rose Palermo (#3330)
Attorney for Husband
Post Office Box 121857
Nashville, TN 37212
(615) 244-4270

CERTIFICATE OF SERVICE

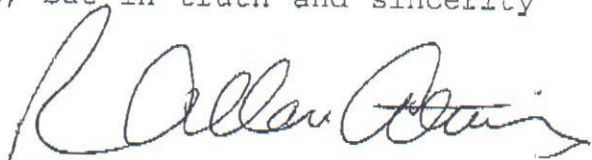
I hereby certify that a copy of the foregoing was mailed to Robert L. Jackson, Attorney for Wife, [REDACTED] on this 3 day of December, 2011.



Rose Palermo

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

R. ALLAN ATKINS, after being first duly sworn, makes oath and states that he has read the foregoing Amended and Supplemental Complaint for Absolute Divorce and that the facts and statements contained therein are true and correct to the best of his knowledge, information and belief, and that the Amended and Supplemental Complaint for Absolute Divorce is not made out of levity or by collusion with the Wife, but in truth and sincerity for the causes mentioned therein.


R. ALLAN ATKINS

Sworn to and subscribed before me this 5th day of
December, 2011.


NOTARY PUBLIC
My Comm. Expires: _____



My Commission Expires JULY 6, 2015