

ANGIE LEIGH HORTON,

*

IN THE CIRCUIT COURT OF
ETOWAH COUNTY, ALABAMA

PLAINTIFF

*

VS.

*

JONATHAN WADE HORTON,

*

DR-98- 1183 wae

DEFENDANT

*

COMPLAINT

Comes now the plaintiff and says:

1. The plaintiff and defendant are both of legal age, and plaintiff is a bona fide resident citizen of the State of Alabama, and has been for more than six months next preceding the filing of this complaint. The defendant is also a resident of the State of Alabama.

2. The parties married on, to-wit: December 7, 1990, and lived together as husband and wife until, to-wit: December 10, 1998, at which time they separated and have not lived together as husband and wife since that date.

3. That there exists such a complete incompatibility of temperament between the parties hereto that it is impossible for them to continue to live together as husband and wife.

4. There have been two children born of the marriage, to-wit: [REDACTED] [REDACTED] That the plaintiff is the fit and proper person to have the care, custody and control of the minor children of the parties with reasonable visitation rights given to the defendant.

5. Defendant should be required to pay a reasonable amount of support in accordance with the guidelines and to keep the children insured and pay their hospital, doctor, medical, dental, optical and other expenses not covered by insurance.

6. That the plaintiff should be awarded possession of the marital home and the defendant should be ordered to make the mortgage payments on it and pay

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the utilities for six months.

7. That the parties have accumulated other personal property and there should be an equitable division of the same.

WHEREFORE, PREMISES CONSIDERED, your plaintiff prays for the following relief:

- A. A Decree of Absolute Divorce;
- B. Custody of the minor children of the parties with reasonable rights of visitation given to the defendant. That the defendant be required to pay child support in accordance with the guidelines and medical expenses.
- C. Exclusive possession of the real estate be given to the plaintiff with the defendant making all mortgage payments, taxes, insurance, and reasonable upkeep, and pay the utilities for six months.
- D. That the plaintiff have full title to the 1994 Honda Accord with the defendant being required to pay the indebtedness on same at Commerce Bank.
- E. That the defendant pay all joint unpaid indebtednesses and hold the plaintiff harmless from payments on same.
- F. That the plaintiff have all household and kitchen furniture, furnishings and effects.
- G. That the defendant be required to pay the plaintiff's attorney's fees and costs of Court.
- H. That a temporary hearing be held for the purpose of determining exclusive possession of the home, custody of the children, support, medical expenses, alimony and attorney's fees.

This 29th day of December, 1998.

Angie Leigh Horton

ANGIE LEIGH HORTON

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STATE OF ALABAMA
COUNTY OF ETOWAH

Personally appeared, ANGIE LEIGH HORTON, who after being by me first duly sworn deposes and says that the facts contained in the foregoing complaint are true and correct to the best of her knowledge, information and belief.

This 29th day of December, 1998.

Angie Leigh Horton
AFFIANC

SWORN TO AND SUBSCRIBED BEFORE ME this 29th day of
December, 1998.

Lisa Culbers
NOTARY PUBLIC

FLOYD, FLOYD & FLOYD

BY: [Signature]
JACK FLOYD
ATTORNEY FOR PLAINTIFF
808 Chestnut Street
Gadsden, AL 35901

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