

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA

Case No.: CD-2000-534 FZ

ANGELA C. BARNA,
Petitioner/Counter respondent,

And
PETER D. BARNA
Respondent/Counterpetitioner, pro se.

ANSWER TO COUNTERPETITION

I, Peter D. Barna, pro se, respectfully request this court deny the Former wife's counter petition for increase in Child Support and in response to each separately numbered paragraph respond, being sworn, certify that the following information is true:

1. I **agree** with Petitioner as to the allegations raised in the following numbered paragraphs in the Petition and, therefore, **admit** those allegations: Paragraphs 1,2,3
2. I **disagree** with Petitioner as to the allegations raised in the following numbered paragraphs in the Petition and, therefore, **deny** those allegations: Paragraph 4 and demands strict proof, Paragraph 4 a. and demands strict proof, Paragraph 4 b. and demands strict proof.
3. I am currently unable to admit or deny the following paragraphs due to lack of information: Paragraph 5
4. Former Wife's Counter Petition, as indicated by the timing of its filing is meant to harass the respondent
5. Former Wife's Counter Petition is filed in bad faith and with intent to deceive the court.
6. Former Wife has, contrary and in violation of law, retained excess monies paid in child support by the Former Husband.

7. Former Wife's Counter Petition for increase in child support is legally insufficient.
8. The Former Husband had to incur expenses for a consultation with an attorney.
9. The Former Husband has been unsuccessful in retaining the services of an attorney to represent him on the West Coast of Florida approached are unavailable to travel to represent him within a limited budget.
10. The former husband submits a copy of the now adult child, Christina Barna's driver's license as proof of age. The former wife refuses to provide records requested for the minor children. Courts records of dissolution contain both the now adult child and minor child's date of birth .

WHEREFORE, the Former Husband respectfully requests this court to enter an order

1. Granting his request for termination of his support obligation for his now adult child, Christina Barna born on March 12, 1986 and graduating from high school on May 23, 2004.
2. Credit the excess child support payments of \$11,641.00, as of date of filing which will escalate by such time as this matter comes to hearing and which were paid subsequent to Christina reaching the age of majority and graduation paid to the Former Wife.
3. Credit the excess payments of \$11,641.00, as of date of filing which will escalate by such time as this matter comes to hearing to the parties minor child Peter Barna,
4. Declare the Former Wife's Counter Petition legally insufficient as failure to specify substantial change in circumstances that she alleges has occurred.
5. Declare the Former Wife comes to this court in bad faith.
6. Demand strict proof of the allegations of the Former Wife in her Counter Petition,
7. Deny the former wife entitlement to an award of attorney fees and costs due to her advancement of unnecessary and harassing litigation,

8. Declare the former wife has wrongly retained excess child support payments in the amount of approximately \$11, 641.00 as of date of filing which will escalate by such time as this matter comes to hearing and is in violation of law,
9. Declare that the Former Wife's Counter Petition is filed to harass and force the Former Husband to incur legal fees and expenses.
10. Award Peter Barna all costs pursuant to F.S. §86.011 and F.S§57.041 for defense of this action.

Respectfully submitted,

Peter Barna, pro se

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Certificate of Service

I certify that a copy of this Reply to Counter Petition was mailed to Philip Chopin, Esq., (Fla. Bar #0050880) Attorneys for Former Wife Phillips Point-West Tower, 777 South Flagler Drive, Suite 800, West Palm Beach, Florida 33401 PH (561)651-7800, this 19th day of October, 2005

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