

Receipt of a copy hereof admitted this
th day of March, 1947.

Chas. H. Epperson
Attorney for Plaintiff
and cross-defendant.

3-13-47

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FILED MAR 7 1947
R. E. GRAHAM, Clerk
R. E. Graham
Deputy

FOLTZ & RENDON
ATTORNEYS AT LAW
311 EAST MAIN STREET
STOCKTON, CALIFORNIA

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA,
IN AND FOR THE COUNTY OF SAN JOAQUIN.

GEORGE W. TELLER,)
Plaintiff) No. 40886 Dept. 2
vs.) ANSWER AND CROSS-COMPLAINT.
LOUISE TELLER,)
Defendant.)
- - - - -)

Comes now the Defendant in the above-entitled action,
and answering the Complaint of Plaintiff on file herein, admits,
denies and alleges as follows:

I.

Admits the allegations contained in Paragraphs I, II and
III, save and except the allegation of Paragraph III wherein it is
alleged "that said minor children are now in the custody of Plain-
tiff herein; that Plaintiff herein is a fit and proper person to
be awarded the care, custody and control of said minor children".

II.

Denies, each and every, all and singular, conjunctively
and disjunctively, the allegations contained in Paragraphs IV, V
and VI of Plaintiff's complaint herein.

1 Defendant and Cross-complainant and Plaintiff and Cross-defendant,
2 and prior to their separation, Cross-defendant, contrary to his
3 marital vows, has been guilty of extreme cruelty toward Cross-
4 plaintiff and has wrongfully inflicted upon Cross-plaintiff grievous
5 mental suffering and grievous bodily injury, without any fault or
6 provocation whatsoever on the part of said Cross-complainant.

7

VI.

8 That Defendant and Cross-complainant has not sufficient
9 money or property with which to support herself and the minor
10 children of the parties hereto, hereinbefore mentioned, either
11 permanently or during the pendency of this action, and has no means
12 with which to pay her attorneys' fees or the costs of defending this
13 action; that she has employed Foltz & Rendon, attorneys-at-law,
14 Stockton, California, to represent her in this action; that Plaintiff
15 and Cross-defendant is steadily employed and is now earning and
16 receiving wages approximating \$400.00 a month and that he will con-
17 tinue to receive and earn like wages, and that said Plaintiff and
18 Cross-defendant is earning sufficient wages and is able to pay to
19 this Defendant and Cross-complainant a reasonable sum for the support
20 and maintenance of herself and the minor children of the parties
21 hereto, and to pay a reasonable sum as and for her attorneys' fees
22 and costs herein; that the sum of \$100.00 per month is a reasonable
23 sum to be allowed Defendant and Cross-complainant for alimony herein,
24 that the sum of \$100.00 per month is a reasonable sum to be allowed
25 Cross-complainant for the support and maintenance of the minor
26 children of the parties hereto, during the pendency of this action,
27 and permanently; that the sum of \$200.00 is a reasonable sum as and
28 for attorneys' fees of Defendant and Cross-complainant herein; and
29 that the sum of \$20.00 is a reasonable sum as and for Defendant and
30 Cross-complainant's costs of suit herein.

31 WHEREFORE, Defendant and Cross-complainant prays for
32 the judgment and decree of this Court.

