

ALBERT LEANARD SNYDER	*	IN THE
Plaintiff/Counter-Defendant	*	CIRCUIT COURT
v.	*	FOR
JULIA FRANCIS SNYDER	*	CARROLL COUNTY
Defendant/Counter-Plaintiff	*	Case: C-2000-32560.DV

ANSWER TO AMENDED PETITION FOR CONTEMPT FOR FAILURE TO COMPLY WITH THE MARITAL SEPARATION AGREEMENT AND FOR FAILURE TO PAY CHILD SUPPORT AND HEALTH CARE AND PETITION TO INCREASE CHILD SUPPORT

Plaintiff/Counter-Defendant, Albert Leanard Snyder, by Michael A. Stoner and Stoner & Ridgell, P.A., his attorneys, and in Answer to the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support states:

1. As to Count 1, he admits the allegations contained in Paragraphs 1, 2, 3, 6, 7 and 8 of the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support.
2. That he denies the allegations contained in Paragraphs 4, 10, 11 and 12 of the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support.
3. That he admits the allegations contained in Paragraph 5 of the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and


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- for Failure to Pay Child Support and Health Care and Petition to Increase Child Support, but further answers that Paragraph Eighteen states "The parties shall consult with each other prior to incurring any major necessary repair or any major improvement, except in the event of an emergency."
4. That he is unable to admit or deny the allegations contained in Paragraph 9 of the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support.
 5. That he admits the allegations contained in Paragraph 13 of the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support, but further answers that Plaintiff lost his job in December 2001. Plaintiff has gained new employment and is paying child support as well as paying toward the arrearage of \$450.00.
 6. As to Count II, he denies the allegations contained in Paragraphs 15 and 16 of the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support.

WHEREFORE the Plaintiff/Counter-Defendant prays:

- A. That the Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support be dismissed;

B. And for such other and further relief as the nature of his cause may require.

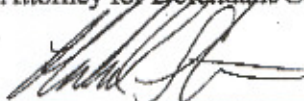
STONER & RIDGELL, P.A.



MICHAEL A. STONER
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410-727-0080
Attorneys for Plaintiff/
Counter-Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of March, 2002, a copy of the foregoing Answer to Amended Petition for Contempt for Failure to Comply with the Marital Separation Agreement and for Failure to Pay Child Support and Health Care and Petition to Increase Child Support was sent, first class mail, postage prepaid, to William T. Glasgow, Esquire, 3440 Ellicott Center Drive, Suite 103, Ellicott City, MD 21043, Attorney for Defendant/Counter-Plaintiff.



MICHAEL A. STONER