

8/10/05

**COMMONWEALTH OF VIRGINIA:**

**IN THE CIRCUIT COURT OF SCOTT COUNTY**

**DONALD [REDACTED], ..... Complainant**

v.

**CHANCERY NO.: C04-64**

**CHARISSA [REDACTED], ..... Defendant**

**CROSS BILL FOR DIVORCE**

Defendant, Charissa [REDACTED], files this cross-bill against plaintiff, Donald [REDACTED]

[REDACTED], and says:

1. Defendant repeats and realleges the allegations contained in paragraphs 1 through 5, 11 and 13 of the bill of complaint filed herein.
2. That the Plaintiff has been extremely cruel toward the defendant. That on numerous occasions, without provocation, the Plaintiff has been guilty of extreme physical and mental cruelty of the defendant and has assaulted her thereby causing great mental anguish, physical injury resulting in permanent disability, and apprehension of future serious bodily harm to herself and fear for her mental and emotional well being.
3. By such conduct, on or about April 7, 2004 the Defendant obtained a protective order from the Scott County Juvenile & Domestic Relations court.

November 3, 2004 by the Scott County Juvenile & Domestic Relations court terminating the Plaintiff's visitation pending a ruling by court with valid jurisdiction.

5. Plaintiff and defendant have not cohabited at any time subsequent to March 31, 2004.
6. Defendant further alleges that plaintiff is not a fit and proper person to have custody of the child of the marriage of the parties. Defendant is a fit and proper person to have such custody. The best interests of the children demand that their care and custody be entrusted to defendant.

WHEREFORE, defendant prays that plaintiff's bill of complaint be dismissed; that she be awarded a divorce *a vinculo matrimonii* on the grounds of extreme physical and mental cruelty; or in the alternative on the grounds that the parties have lived separate and apart for more than one year; that she be awarded temporary and permanent custody of the child born of this marriage; that she be awarded money for her support and maintenance and the support and maintenance of said child during the pendency of this suit; that she be awarded permanent support and maintenance for herself and for said child; and for such other and further relief as to equity may seem meet and the nature of the case may require.

Charissa ██████████  
By Counsel

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