

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE MARRIAGE OF

CASE NO: 501971DR004137XXDIFD

WILLIAM A. CABANA,
Petitioner/Former Husband,

FAMILY DIVISION

and

SHARON ANN MAYO f/k/a
SHARON ANN CABANA
Respondent/Former Wife.

**FORMER WIFE'S ANSWER TO SUPPLEMENTAL PETITION FOR
MODIFICATION OF ALIMONY**

COMES NOW the Former Wife, SHARON ANN MAYO, by and through undersigned counsel, and answers Former Husband's Supplemental Petition for Modification of Alimony as follows:

1. The Former Wife admits the allegations contained in paragraphs 1, 2 and 3.
2. The Former Wife denies the allegations contained in paragraphs 4, 5, 6, and 7.

WHEREFORE, having fully answered Former Husband's Supplemental Petition for Modification of Alimony, Former Wife prays that this Court enter an Order denying Former Husband's Supplemental Petition for Modification of Alimony, and affirmatively requests that relief be granted consistent with her Counter-petition hereinbelow set forth.

**COUNTER-PETITION FOR AWARD OF ATTORNEY'S FEES, COSTS
AND LITIGATION EXPENSES**

COMES NOW the Former Wife, SHARON ANN MAYO, by and through

undersigned counsel, and states as follows:


1. This cause is before the Court on Former Husband's Supplemental Petition for Modification of Alimony.
2. Subsequent to the filing of the Supplemental Petition for Modification of Alimony, the Former Husband has engaged in a course of conduct specifically designed to intimidate, harass and burden the Former Wife with attorney's fees, costs and litigation expenses, which Former Wife is unable to pay.
3. The Former Wife has retained the services of the undersigned attorneys and has agreed to pay those reasonably incurred attorney's fees, costs and litigation expenses for which Former Husband should be held accountable.
4. The Former Husband is better able to pay Former Wife's attorney's fees, costs, and litigation expenses, and should be ordered to do so.
5. The Former Wife has retained the services of the undersigned attorney to represent her in this action. To the extent that the Court finds that the Former Husband has the superior ability to pay and the Former Wife needs her attorney's fees paid, the Former Wife would request payment for such reasonable attorney's fees, costs and suit money. Alternatively, to the extent that the Court finds that the Former Husband engages in excessively litigious or non-meritorious claims, the Former Wife would respectfully request that the Court award her any reasonable and necessary attorney's fees and costs.

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WHEREFORE, Former Wife prays that this Court enter an order awarding to her all of her attorney's fees, costs and litigation expenses and for such other and further relief as may be proper.

I HEREBY CERTIFY that a true copy of the foregoing was furnished by mail to Mr. William A. Cabana, 1050 Capri Isles Blvd., #F105, Venice, FL 34292, this 2 day of September, 2005.

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By: 
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