DOCUMENT 95

ELECTRONICALLY FILED 6/19/2013 11:09 AM 20-DR-2011-000272.00 CIRCUIT COURT OF COLBERT COUNTY, ALABAMA NANCY L. HEARN, CLERK

#### IN THE CIRCUIT COURT OF COLBERT COUNTY, ALABAMA

## BARBARA BONNER, Petitioner,

v.

# Case No.: DR 11-272

# WILLIAM JAMES BONNER, Respondent

### AMENDMENT TO COUNTER CLAIM TO MODIFY THE DIVORCE

Comes now the Respondent and finds it necessary to Amend his Counter Claim filed on August 11, 2011 and for his reason states as follows:

1. That the Respondent has suffer severe health problems and has been forced to file for his Social Security Disability benefits.

2. That the Respondent has been diagnosed with COPD and has several spots on his lungs that have increased in size over the year.

3. That the respondent has been unable to carry forth with his business interest because of his poor health. The respondent has transferred his business to David Gresham and is now only involved in the real estate school on a part time basis. He will continue to teach at the real estate school as health allows. He does act as a consultant for the business if needed. The transfer of the business did not involve an exchange of funds. The purpose of the transfer was to prevent the actual closure of the business which would have caused a severe economic strain on the client base and others.

4. That the respondent's sole income consists of \$3415.00 per month of which \$2446.81 is obligated to the bank for direct payment on various loans. The respondent has a total of \$968.19 per month for living expenses. The respondent is trying to avoid taking a bankruptcy because it will effect so many others that depend on him. **DOCUMENT 95** 

Wherefore the Premises Considered, the Respondent would ask the Court to Modify the parties Divorce Decree to reflect the respondent's actual income and to consider that his future income will be considerably less because of his poor health.

/s/ William C. Nabors

William C. Nabors (NAB 006) Attorney for Petitioner P.O. Box 1170 Florence, AL 35631 (256) 766-5700

### **CERTIFICATE OF SERVICE**

I hereby certify that on this  $19^{th}$  day of June 2013, a complete copy of the forgoing document has been served on Honorable Lindsey Davis, by the following: () U.S. Mail () Hand Delivery () In Open Court () Attorney's Court House Mailbox. (X) E-File.

/s/ William C. Nabors William C. Nabors