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**WEBER GALLAGHER SIMPSON  
STAPLETON FIRES AND NEWBY, LLP**  
BY: CAROLYN R. MIRABILE, ESQUIRE  
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(610)272-5555

BY: .....  
ATTORNEY FOR PLAINTIFF

<b>MELISSA BEMER,</b>	:	<b>IN THE COURT OF COMMON PLEAS OF</b>
<b>Plaintiff</b>	:	<b>DELAWARE COUNTY, PA</b>
	:	
<b>vs.</b>	:	
	:	<b>Docket #2024-007234</b>
<b>STEPHEN BOERNER,</b>	:	
	:	
<b>Defendant</b>	:	<b>IN DIVORCE</b>
	:	

2024 DEC - 3 AM 8:43  
OFFICE OF JUDICIAL SUPPORT  
DELAWARE CO. PA.

**ANSWER TO COUNTER-CLAIM IN DIVORCE**

**COUNT I**

28. No response is required.
29. Denied as a conclusion of law for which no response is required.
30. Denied. Counterclaim Defendant is without information or belief as to what Counterclaim Plaintiff may do and/or believe.

**COUNT II**

31. No response is required.
32. Denied as a conclusion of law for which no response is required.
33. Denied. Counterclaim Defendant is without information and/or belief as to the truth of this averment. Strict proof thereof is demanded at time of trial.

**COUNT III**

- 15. No response is required.
- 16. Admitted.
- 17. Denied as a conclusion of law for which no response is required.

**COUNT IV**

- 18. No response is required.
- 19. Denied as a conclusion of law for which no response is required.
- 20. Counterclaim Defendant is without information and/or belief as to the truth of this  
averment.
- 21. Denied as a conclusion of law for which no response is required.

**COUNT V**

- 22. No response is required.
- 23. Denied. Strict proof thereof is demanded at time of trial.
- 24. Denied. Strict proof thereof is demanded at time of trial.
- 25. Denied as a conclusion of law for which no response is required.
- 26. Denied as a conclusion of law for which no response is required.
- 27. Denied. Counterclaim Defendant is without reasonable information and/or belief as  
to the truth of this averment.
- 28. Denied as a conclusion of law for which no response is required.

**COUNT VI**

29. No response is required.

30. Denied. Counterclaim Defendant is without sufficient information and/or belief as to the truth of this averment. Strict proof thereof is demanded at time of trial.

31. Denied as a conclusion of law for which no response is required.

**COUNT V**

32. No response is required.

33. Denied. Counterclaim Defendant is without sufficient information as to whether Counterclaim Plaintiff can pay reasonable attorneys fees for said counsel.

34. Counterclaim Defendant is without information and/or belief and to the truth of this averment. Strict proof thereof is demanded at time of trial.

BY:

  
Carolyn R. Mirabile, Esquire

Attorney for Plaintiff/Counterclaim Defendant

Date: November 18, 2024

## VERIFICATION

I verify that the statements made in the foregoing pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Melissa Bemmer  
MELISSA BEMER

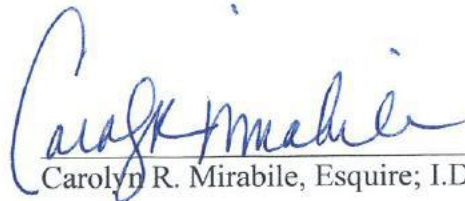
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	:	
<b>Defendant</b>	:	<b>IN DIVORCE</b>
	:	

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

  
Carolyn R. Mirabile, Esquire; I.D. 63720