

IN THE Circuit COURT FOR MONTGOMERY COUNTY  
IN THE STATE OF TENNESSEE, AT CLARKSVILLE

FILED  
WENDY DAVIS  
CIRCUIT COURT CLERK  
BY: [Signature]  
2021 AUG 22 PM 3:42

MARK E. GREEN,

Petitioner,

vs.

CAMILLA J. GREEN,

Respondent.

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File No. CC 24 CV 1644

Judge Assigned

Kathryn W. Olita

**COMPLAINT FOR ABSOLUTE DIVORCE**

The Petitioner would most respectfully show to the Court:

I:

Pursuant to the provisions of Tennessee Code Annotated, Section 36-4-106,

the Petitioner submits the following statistical information:

PETITIONER

1. Full Name: Mark E. Green
2. Race: Caucasian
3. Residence: 1600 Oak Plains Rd, Ashland City, Montgomery County, TN 37015
4. Length of Residence: More than six (6) months
5. Date and Place of Birth: November 8, 1964  
Jacksonville, Florida
6. Employed: Yes
7. Number of Prior Marriages: 0
8. Member of Armed Forces: No
9. Education Level: Graduate Degree

RESPONDENT

1. Full Name: Camilla J. Green
2. Race: Caucasian
3. Residence: 1600 Oak Plains Rd, Ashland City,  
Montgomery County, TN 37015
4. Length of Residence: More than 3 months
5. Date and Place of Birth: December 3, 1967  
West Point, NY
6. Employed: Self
7. Number of Prior Marriages:
8. Member of Armed Forces: No
9. Education Level: Bachelor of Science

DATE AND PLACE OF MARRIAGE:      October 25, 1988  
Elizabethtown, KY

DATE AND PLACE OF SEPARATION:    None

MINOR CHILDREN BORN OF THIS MARRIAGE: NONE (0)

(1) GROUND FOR DIVORCE:

(A) Irreconcilable differences as provided for in Tennessee Code Annotated, Section 36-4-101(14).

II.

(1) The parties own certain personal property and/or realty, and have incurred certain financial obligations, all of which will be fully revealed to the Court on the date of the hearing, as well as all other facts pertinent to the determination by the Court of the property rights of the parties for the purpose of making a proper and

equitable adjustment of the interests of the parties in their jointly held and individually held personal property and their debts.

(2) Petitioner avers that the Statutory Restraining Order should be entered in conjunction with the filing and service of this Complaint, seeking an uncontested divorce, thereby restraining the parties from withdrawing, and divesting the marital estate of its assets, other than to the extent that such assets are required for daily living expenses.

(3) There are no minor children of this marriage, and none are expected.

PREMISES CONSIDERED, the Petitioner prays:

(1) That the Petitioner be granted permission to file this Bill of Complaint, and that proper process issue and be served in this cause, requiring the Respondent to Answer; however, the Respondent's oath to the Answer is expressly waived;

(2) That, at the hearing of this cause, the Petitioner be granted an absolute divorce from the Respondent, bestowing upon the Petitioner all of the rights, privileges and immunities of an unmarried person, and restoring each of the parties to an unmarried status;

(3) That, in the event the parties hereto enter into a Marital Dissolution Agreement, this Court approve said Dissolution Agreement and incorporate such Agreement into a Final Decree of Divorce between the parties;

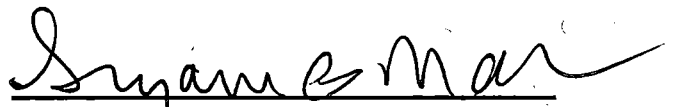
(4) That the Court make an equitable and proper distribution and allocation in this action with respect to property rights and assets of the parties, and award to each their fair and proper portion of the separate and joint property of the parties; that the Court make a proper determination and allocation between the parties of the parties' financial obligations/debts thereby dividing such debt fairly and equitably between the parties, and as specifically set forth above herein; and

(5) That the Petitioner have such other, further, and general relief to which he may show himself entitled.

Respectfully submitted,

BATSON NOLAN PLC

By:



Suzanne G Marsh, BPR No. 015555

Attorney for Petitioner

2678 Townsend Court

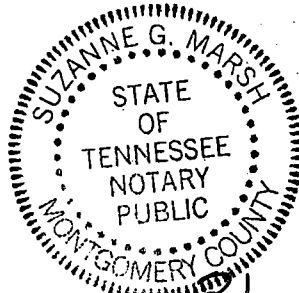
Clarksville, Tennessee 37043

(931) 647-1501

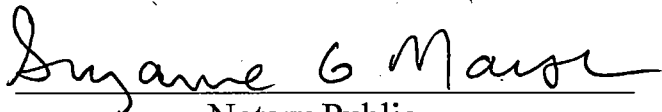
STATE OF TENNESSEE )  
 )  
COUNTY OF MONTGOMERY )

Personally appeared before me, the undersigned, a Notary Public in and for said County and State, MARK E. GREEN, the Petitioner herein, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who made oath that the statements set forth in the foregoing Bill of Complaint for an Absolute Divorce are true and correct to the best of the Petitioner's knowledge, information and belief, and that the Complaint is not made out of levity, or by collusion with the Respondent, but in sincerity and in truth for the causes mentioned in the Bill of Complaint.

  
Mark E. Green



Subscribed and sworn to before me this the 31 day of July 2024.

  
Notary Public

My Commission Expires: 2-15-28

**To all parties to this action:**

Pursuant to T.C.A. § 36-4-106, each party is restrained and enjoined from:

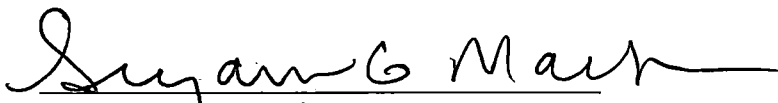
1. Transferring, assigning, borrowing against, concealing or in any way dissipating or disposing of, without the consent of the other party or an order of the court, any marital property. Expenditures from current income to maintain the marital standard of living and the usual and ordinary costs of operating a business are not restricted by this restraining order. Each party shall maintain records of all expenditures, copies of which shall be available to the other party upon request;

2. Voluntarily canceling, modifying, terminating, assigning, or allowing to lapse for nonpayment of premiums, any insurance policy, including but not limited to life, health, disability, homeowners, renters and automobile, where such insurance policy provides coverage to either of the parties as beneficiaries, without the consent of the other party or an order of the court;

3. Hiding, destroying or spoiling, in whole or in part, any evidence electronically stored or on computer hard drives or other memory storage devices.

**SURETY**

Batson Nolan PLC is surety for costs incurred in this matter.

  
Suzanne G. Marsh