

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE  
AT NASHVILLE

**BENJAMIN FOLDS,** )  
*Plaintiff/Husband,* )  
 )  
v. )  
 )  
**EMMA SANDALL,** )  
*Defendant/Wife.* )

Docket No. \_\_\_\_\_

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**COMPLAINT FOR DIVORCE**

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1. Plaintiff, BENJAMIN FOLDS, (hereinafter called "Husband") is married to Defendant, EMMA SANDALL (hereinafter called "Wife"). The following is the statistical information pertaining to said parties required by T.C.A. §36-4-106:

**WIFE:**

- a. Full maiden name of Wife: **Emma Elisabeth Sandall**
- b. Race or color: **Caucasian**
- c. Mailing address: **1516 Daventry Court, Nashville, Tennessee 37221**
- d. Length of residence in Tennessee: **Over six (6) months**
- e. Date and place of birth: **7/5/1977 in New South Wales**
- f. Number of previous marriages: **0**
- g. Member of the Armed Services of the United States: **No**
- h. Employed: **Self-employed**

**HUSBAND:**

- i. Full name of Husband: **Benjamin S. Folds**
- j. Race or Color: **Caucasian**
- k. Mailing address: **1516 Daventry Court, Nashville, Tennessee 37221**
- l. Length of residence in Tennessee: **Over six (6) months**
- m. Date and place of birth: **9/12/1966 in Greensboro, North Carolina**

- n. Number of previous marriages: **4**
- o. Member of the Armed Services of the United States: **No**
- p. Employed: **Self-employed**
- q. Date and place of marriage of the parties: **1/20/2017 in Hawaii**
- r. Date of separation of the parties: **11/20/2023**
- s. Residence of the parties at the time of their separation: **1516 Daventry Court, Nashville, Tennessee 37221**
- t. Minor children born of this marriage and their dates of birth: **None**
- u. Grounds for divorce relied on by Plaintiff: **Irreconcilable differences**
- v. Description of any other litigation concerning the custody of these children in this or any state in which either party has participated: **N/A**
- w. Do you currently have an Order of Protection in force in the Circuit Court of Davidson County, Tennessee: **No**

Husband would further show to the Court as follows:

**II.**

Complainant would respectfully show unto the Court that these parties have suffered irreconcilable differences pursuant to T.C.A §36-4-101(a)(14) and are unable to live together successfully as Husband and Wife.

**III.**

Husband would show unto the Court that the parties have entered into a Marital Dissolution Agreement, which has been executed and notarized. Husband would ask the Court to approve the Agreement and incorporate the same into a Final Decree of Divorce.

**IV.**

Husband would state that during the marriage the parties have accumulated certain marital assets, including real and personal assets. He would also show that each party has separate property. Husband would therefore request that the Court approve such Marital Dissolution Agreement that the parties have executed and attached herein as Exhibit A. In the alternative,

Husband would request that at the final hearing of this cause, the Court make an equitable division of the marital and separate assets and debts of the parties based upon the facts and circumstances presented to the Court, and that Husband be awarded his separate property.

**PREMISES CONSIDERED, COMPLAINTANT PRAYS:**

1. That service of process not issue upon Wife pursuant to T.C.A. §36-4-103(a)(2) based on the executed and notarized Marital Dissolution Agreement attached hereto as Exhibit A.
2. That the Notice of Statutory Injunctions pursuant to the provisions of T.C.A §36-4-106(d) be attached hereto and incorporated herein as required by law.
3. That the Court approve the Marital Dissolution Agreement that has been executed by the parties and attached hereto as Exhibit A, and incorporate the same into the Final Decree of Divorce to be entered in this cause.
4. That at the final hearing of this cause, Husband be granted an absolute divorce upon the grounds of irreconcilable differences and be restored to all rights and privileges of an unmarried person.
5. That the Court make an equitable distribution of the marital assets of the parties, and that Husband be awarded his separate property.
6. For any and all further general and/or specific relief to which Husband may be entitled.

Respectfully submitted,

**CHEATHAM, PALERMO & GARRETT**

/s/ Rose Palermo  
**ROSE PALERMO, #03330**  
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