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1121/0035 08 001 Page 1 of 5

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Cook County Recorder 55.50

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, DOMESTIC RELATIONS



IN RE: THE MARRIAGE OF)
)
RUTH MARTIN,)
)
Petitioner,)
)
v.)
)
TED MARTIN,)
)
Respondent.)

No.

00003179

0010605901-1 11/10/12
DOM. REL. CAL. #C

PETITION FOR DISSOLUTION OF MARRIAGE

NOW COMES the Petitioner, Ruth Martin, by and through her attorneys, Wiczer & Associates, Chartered, and for her Petition for Dissolution of the Marriage of the parties, Petitioner states as follows:

1. That the Court has jurisdiction over the subject matter herein and the parties hereto.
2. That the Petitioner is a resident of the State of Illinois, County of Cook, and has been so residing for at least one year up to the present time.
3. That the Respondent is a resident of the State of Illinois, County of Cook, and has been so residing for at least 90 days up to the present time.
4. That Petitioner is 64 years of age and is residing at Chicago, Cook County, Illinois.
5. That the Respondent is 76 years of age and is residing at Chicago, Cook County, Illinois and is the owner of Parkway Metal Products, Inc.

6. Petitioner and Respondent were lawfully married on February 3, 1967, in Chicago, Illinois and the marriage was registered in Chicago, Illinois.

7. That two children were born to the parties, namely, Rena, age 31 and Arona, age 28. Both children are emancipated. No children were adopted and Petitioner is not now pregnant.

8. Without cause or provocation by the Petitioner, Respondent is guilty of extreme and repeated mental cruelty toward the Petitioner.

9. The Petitioner and Respondent have acquired certain marital property including, but not limited to, the following:

- (a) the marital home commonly known as 927 Castlewood, Chicago, Illinois;
- (b) retirement benefits that the parties have accumulated during the marriage;
- (c) various items of clothing, furniture, jewelry and household furnishings;
- (d) automobiles;
- (e) financial accounts in the name of the Petitioner and Respondent;
- (f) Respondent's and/or Petitioner's interest in Parkway Metal Products, Inc.;
- (g) various parcels of real estate; and
- (h) a time share in Sarasota, Florida.

10. Petitioner and Respondent have various marital debts that should be equitably divided and paid for by Petitioner and Respondent.

11. Respondent is gainfully employed and earning substantial income has sufficient resources and income to pay his own attorneys' fees, and to maintain himself and is therefore not entitled to an award of costs and/or maintenance in this case.

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12. Conversely, Petitioner is not employed and does not have the resources or income to pay her own attorney's fees and/or to maintain herself and is therefore entitled to an award of costs and/or maintenance in this case.

WHEREFORE, the Petitioner, Ruth Martin, prays that this Honorable Court enter judgment as follows:

- A. For dissolution of marriage in favor of both parties dissolving their marriage;
 - B. Award to Petitioner her own property and all of her non-marital property, if any exists;
 - C. Award to Petitioner and Respondent each an equitable portion of their marital property;
 - D. Order that Respondent be barred from past, present, or future maintenance from Petitioner;
 - E. Order that Respondent be barred from an award of attorneys' fees and costs;
 - F. Order an award of maintenance and attorney's fees to Petitioner;
 - G. Enter such other orders as may be just in reference to the debts of the parties;
- and
- H. Grant such other relief as this Court deems appropriate and equitable.

Respectfully submitted,

RUTH MARTIN

By: _____
One of Her Attorneys

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WICZER & ASSOCIATES, CHARTERED
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(847) 480-1020
Attorney No. 23692

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LD LEGAL DESCRIPTION

PARCEL 1: UNIT 35 AS DELINEATED ON THE SURVEY OF THAT PART OF LOTS 2, 3 AND 4 IN ANN MURPHY ESTATE DIVISION OF LAND IN SECTION 27 AND SECTION 28, TOWNSHIP 41 NORTH, RANGE 12 EAST OF THE THIRD PRINCIPAL MERIDIAN, DESCRIBED AS FOLLOWS: BEGINNING AT THE INTERSECTION OF THE SOUTH LINE OF THE NORTH 1/2 OF LOT 4 AFORESAID AND THE WEST LINE OF THE EAST 840.0 FEET OF LOTS 3 AND 4 AFORESAID (SAID INTERSECTION POINT AND POINT OF BEGINNING BEING ASSIGNED COORDINATES OF 3000.00 NORTH AND 2000.00 EAST; AND THE SOUTH LINE OF THE NORTH 1/2 OF LOT 4 AFORESAID BEING ASSIGNED A BEARING NORTH 90 DEGREES 00 MINUTES 00 SECONDS WEST;); THENCE NORTH 90 DEGREES 00 MINUTES 00 SECONDS WEST ALONG SAID SOUTH LINE A DISTANCE OF 504.17 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 90.83 FEET; THENCE NORTH 90 DEGREES 00 MINUTES 00 SECONDS EAST 130.83 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 9.33 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 80.00 FEET; THENCE SOUTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 12.00 FEET; THENCE SOUTH 90 DEGREES 00 MINUTES 00 SECONDS EAST 210.67 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 104.67 FEET; THENCE NORTH 90 DEGREES 00 MINUTES 00 SECONDS EAST 21.33 FEET; THENCE NORTH 00 DEGREE 00 MINUTES 00 SECONDS EAST 174.33 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS WEST 17.01 FEET, THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 151.50 FEET; THENCE NORTH 00 DEGREES 00 MINUTES 00 SECONDS EAST 100.00 FEET TO THE WEST LINE OF THE EAST 840.0 FEET OF LOTS 3 AND 4 AFORESAID; THENCE SOUTH 02 DEGREES 32 MINUTES 30 SECONDS WEST ALONG SAID WEST LINE 508.50 FEET TO THE POINT OF BEGINNING (EXCEPT THEREFROM THE NORTH 243.00 FEET AND EXCEPT THE EAST 5.00 FEET AND EXCEPT THE SOUTH 5.00 FEET ALL AS MEASURED AT RIGHT ANGLE, IN COOK COUNTY, ILLINOIS, WHICH SURVEY IS ATTACHED AS EXHIBIT "A" TO DECLARATION OF CONDOMINIUM OWNERSHIP MADE BY THE LABALLE NATIONAL BANK AS TRUSTEE UNDER TRUST AGREEMENT DATED JULY 15, 1972 AND KNOWN AS TRUST NUMBER 44427, RECORDED IN THE OFFICE OF THE RECORDER OF DEEDS, IN COOK COUNTY, ILLINOIS AS DOCUMENT 23029784, AS AMENDED BY DOCUMENT 23395091

PARCEL 2: EASEMENTS FOR INGRESS AND EGRESS THROUGH THE COMMUNITY AREA

APPURTENANT TO AND FOR THE BENEFIT OF PARCEL 1 THROUGH THE COMMUNITY AREA AS SET FORTH IN THE DECLARATION OF EASEMENTS, RESTRICTIONS AND COVENANTS FOR PARK LANE COMMUNITY ASSOCIATION RECORDED FEBRUARY 13, 1975 AS DOCUMENT 22996721 AMENDED BY DECLARATION RECORDED FEBRUARY 20, 1976 AS DOCUMENT 23395089 AND AS CREATED BY DEED FROM LABALLE NATIONAL BANK, AS TRUSTEE UNDER TRUST NUMBER 47107 TO STEPHEN J. LOMBARDO AND THERESA V. LOMBARDO DATED JUNE 1, 1977 AND RECORDED JUNE 14, 1977 AS DOCUMENT 23968113

Address: 35-Park-Lane, Park Ridge, IL
PIN #: 09-27-306-151

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