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now pregnant;

5. That no children were adopted by the parties, and Petitioner is not

1977; and James Foster, born January 28, 1980;

namely: Genevieve Foster, born March 5, 1974; George Foster, born April 23,

4. That three children were born to the marriage of the parties,

13, 1973, and the marriage was registered in Chicago, Cook County, Illinois;

3. That she was married to Respondent, JOSEPH LEE FOSTER, on November

for the ninety days immediately preceding the filing of this petition;

Illinois and the County of Cook and has been a resident of these jurisdictions

2. That Petitioner is now a resident and domiciliary of the State of

petition and the parties thereto;

1. That the Court has jurisdiction over the subject matter of this

being duly sworn upon her oath, deposes and says:

MARGARET ANN FOSTER, by and through her attorney, Pro Bono Advocates,

PETITION FOR DISSOLUTION OF MARRIAGE

Respondent,

JOSEPH LEE FOSTER,

vs.

Petitioner,

MARGARET ANN FOSTER,

IN RE THE MARRIAGE OF

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

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

89387419

#91270

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CIRCUIT COURT OF COOK
COUNTY ILLINOIS
JUDICIAL CENTER REL DIV
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ANGELIA PUGH
CLERK

NO:

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6. That Petitioner and Respondent lived together at 1034 N. Austin Boulevard, Oak Park, Illinois until July, 1987, when Petitioner and her children left the marital residence at Respondent's insistence and the threat of further abuse. In September, 1988, Petitioner and her children returned to the home upon having learned that Respondent had left the State. Upon information and belief, Respondent is living in the State of Maryland;

7. That Respondent has, without cause or provocation by Petitioner, been guilty of inflicting extreme and repeated physical and mental cruelty upon Petitioner and her three children;

8. That Petitioner is a fit and proper person to have custody of the parties' minor children, and that Respondent is not fit to have custody of the minor children;

9. That Petitioner is 37 years of age, is employed as a housekeeper, has no savings, and no significant assets or belongings, and has applied for public aid;

10. That Respondent is 42 years of age, has been employed as a contract engineer in the State of Maryland;

11. During the course of the marriage, the parties acquired certain marital property, including but not limited to: real property located at 1034 N. Austin Boulevard, Oak Park, Illinois, and the personal property therein and a 1985 car in Respondent's possession.

12. During the course of the marriage, the parties acquired certain marital debts, including but not limited to: mortgage on real property located at 1034 N. Austin Boulevard, Oak Park, Illinois; utilities for the marital property at 1034 N. Austin, Oak Park, Illinois;

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13. That Petitioner is without sufficient funds with which to support herself and the minor children, and is in need of maintenance and child support, both temporary and permanent; and that Respondent is well able to support himself, Petitioner, and the minor children;

WHEREFORE, PETITIONER PRAYS:

A. That a Judgment of Dissolution of Marriage be entered between the parties, dissolving the marriage between them;

B. That Petitioner, MARGARET ANN FOSTER, be awarded full legal custody, care, control, and education of the parties' minor children;

C. That the Court issue a Plenary Order of Protection under the Illinois Domestic Violence Act of 1986 against Respondent providing such relief as is set forth in the attached Petition for Order of Protection, to be incorporated in the Judgment for Dissolution of Marriage in this matter, and to remain in full force and effect with the said Judgment until specifically modified by this Court;

D. That Respondent be required to pay Petitioner a sum each week commensurate with his present income for maintenance and child support, both temporary and permanent;

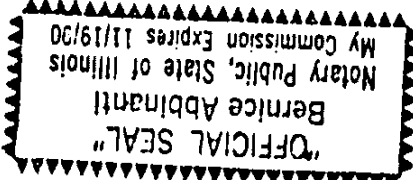
E. That the Petitioner be awarded one-half of the parties' joint personal property, or the financial equivalent thereto, and specifically be awarded one-half interest in the marital home located at 1034 N. Austin Boulevard, Oak Park, Illinois.

F. That Petitioner be awarded the personal property now in her possession;

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PRO BONO ADVOCATES - #91270
165 N. CANAL, SUITE 1020
CHICAGO, ILLINOIS 60606
TELEPHONE: (312) 906-8010

NOTARY PUBLIC
Bernice Abbinanti
The day of August, 1989.

MARGARET ANN FOSTER
Margaret Ann Foster

I, MARGARET ANN FOSTER, being first duly sworn and on oath depose and state that I am the petitioner in the above captioned matter; that SS. Dissolution of Marriage and have knowledge of the contents thereof; and that all matters set forth herein are true in substance and in fact.

Verification

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

MARGARET ANN FOSTER
Margaret Ann Foster

deem appropriate.
1. That Petitioner be granted such other relief as this Court shall

receives, and her other court costs; including the market value of any pro bono legal services that petitioner

H. That Respondent be required to pay Petitioner's attorney's fees, promptly and regularly;

for all expenses connected with Respondent's failure to pay these debts his own behalf; and that Respondent shall indemnify and reimburse Petitioner debts and obligations, or any debts or obligations incurred by Respondent on

G. That Respondent shall not hold Petitioner liable for any marital

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REPLY TO THIS MAIL

COURT AND WITNESS THEREOF IS SUBJECT TO THE

THIS ORDER IS THE COMMAND OF THE CIRCUIT

CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILL.

[Handwritten signature]

DATE 8-21-89

I HEREBY CERTIFY THE ABOVE TO BE CORRECT

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COOK COUNTY CLERK'S OFFICE
PROPERTY TAX DEPARTMENT
100 N. WASHINGTON ST.
CHICAGO, ILL. 60602

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PROPERTY TAX DEPARTMENT
100 N. WASHINGTON ST.
CHICAGO, ILL. 60602
89387419

1034 N. Austin Boulevard
Oak Park, Illinois
Tax ID # 16-05-314-021
The South 33 1/3 ft of Lot 4 in
Block 81 in Hooker's Subdivision
of the N.E. 1/4 of the S.W. 1/4
of Sec 5-39-13

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PRO BONO ADVOCATES
Volunteer Lawyers for Civil Rights
165 N. Canal St. Ste. 1020
Chicago, IL 60606

Patricia J. Bay



M.A.L. 78:



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