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DEPENDENS NOTICE

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

JANE E. RADULOVICH
 Plaintiff,
 vs.
 WILLIAM RADULOVICH
 Defendant,

96539977

No. 86 D 13525
 DEPT-01 RECORDING \$45.50
 T95555 TRAN 7817 07/16/96 11:20:00
 #0033 + JJ *-96-539977
 COOK COUNTY RECORDER

I, the undersigned, do hereby certify that the above entitled cause was filed in my office on the twentieth day of June 1996 and is now pending in said court and that the property affected by said cause is described as follows:

DEPT-10 PENALTY \$42.00

2735 Glenwood-Dyer Road, Lynwood, Illinois 60411 also known as RR 1, Box 106, Chicago Heights, Illinois 60411

PARCEL 1: That part of the Northeast quarter of the Southwest quarter of Section 18, Township 35 North, Range 15 East of the Third Principal Meridian, described as follows: Beginning at a point on the East and West centerline of the South half of Section 18 aforesaid, 268.2 feet West of the North and South centerline of said Section 18 aforesaid; thence West along the said line 190 feet; thence Northwesterly 1149.25 feet, more or less, to a point in the centerline of Glenwood Dyer Road 672.28 feet Northwesterly of its intersection with the North and South center line of said Section 18 aforesaid; thence Southeasterly along the centerline of said road 232.38 feet and thence Southerly to the place of beginning (excepting from above described premises the Easterly 16 feet thereof and except therefrom that part lying Southerly of a line perpendicular to the West line from a point in said West line 783.10 feet Northerly of the Southwest corner of said tract as measured on said West line) in Cook County, Illinois.

96539977

F	4550	A
P	4200	P
T	8950	V
I		

PARCEL 2: That part of the Northeast quarter of the Southwest quarter of Section 18, Township 35 North, Range 15 East of the Third Principal Meridian, described as follows: Beginning at a point on the East and West centerline of the South half of Section 18 aforesaid, 268.2 feet West of the North and South centerline of said Section 18 aforesaid; thence West along the said line 190 feet; thence Northwesterly 1149.25 feet, more or less, to a point in the centerline of Glenwood Dyer Road 672.28 feet Northwesterly of its intersection with the North and South centerline of said Section 18 aforesaid; thence Southeasterly along the centerline of said road 232.38 feet

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and thence Southerly to the place of beginning (excepting from above described premises the Easterly 16 feet thereof and except therefrom that part lying Northerly of a line drawn perpendicular to the West line from a point in said West line 530.60 feet Northerly of the Southwest corner of said tract as measured on said West line), in Cook County, Illinois.

Permanent Real Estate Index Number 33-18-302-010

in Cook County, Illinois.
Witness my hand and the seal of said court.

Dorothy A. Styx
.....
~~Clerk of the Circuit Court~~
Attorney for Plaintiff

By.....
~~Deputy Clerk~~

Name LAW FIRM OF THOMPSON, TIERNEY AND STYX, P.C.
Attorney for Petitioner
Address 18115 Dixie Highway
City Homewood, IL 60430
Telephone 708-799-0051

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STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

Attorney No. 31070

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

IN RE: THE MARRIAGE OF)

JANE E. RADULOVICH)
Petitioner)

and)

WILLIAM RADULOVICH)
Respondent,)

86 D 13525

FILED-6
1985 FEB 20 PM 1:22

RULE TO SHOW CAUSE

NOW COMES the Petitioner, JANE E. RADULOVICH, by and through her attorney, DOROTHY A. SRYX, in accordance with 750 ILCS 5/505, 5/508, 5/513 and in support of her Petition for Rule To Show Cause against Respondent, WILLIAM RADULOVICH states as follows:

COUNT I

SUPPORT ARREARAGE

1. That a Judgment for Dissolution of Marriage was entered in this matter on August 12, 1985 and a copy is attached hereto.
2. That said judgment provided for the payment of child support to Petitioner as follows:

"A. Husband shall pay to Wife the sum of \$175.00 per week, or 32% of his net income, whichever is greater, for the support of the minor children BRIAN, STACY and ERIN. Husband's obligation to pay support shall be reduced to 25% of his net income upon the oldest child reaching majority or graduating from high school, whichever occurs last.

Law Offices of
Mary G. Thompson
18115 Dale Highway
Homewood, IL 60430
708/799-0081
Fax: 708/799-1102

Attorneys:
Mary G. Thompson
70746

Dorothy A. Sryx
31070

Legal Assistants:
Marie Fiorillo
M. Kathleen Healey

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Husband's obligation to pay support shall be reduced to 20% upon the second oldest child reaching majority or graduating from high school, whichever occurs last. Husband's obligation to pay support shall terminate and end upon the youngest child reaching majority or graduating from high school, whichever occurs last."

3. That subsequent to the entry of this order, the parties oldest child, Brian graduated from high school and the parties agreed that the correct prorated child support figure for the remaining two minor children was One Hundred Thirty-Seven (\$137.00) Dollars per week.

4. That Respondent paid support in the amount of One Hundred Thirty-Seven (\$137.00) Dollars per week until approximately March 1, 1994 when he discontinued payment of all support.

5. That Respondent is now approximately Eleven Thousand Two Hundred Thirty-Four (\$11,234.00) Dollars in arrears on this support obligation for the two minor children through September of 1995 when the second oldest child, Stacy became eighteen years old.

6. That when the parties second oldest child, Stacy became eighteen years of age in September of 1995, the parties agreed that the correct prorated child support figure for the remaining one minor children was Sixty-Nine (\$69.00) Dollars per week.

7. That Respondent has failed to pay any support on the remaining minor child, ERIN since September of 1995 and is now in arrears on this current child support obligation in the amount of One Thousand Four Hundred Forty-Nine (\$1,449.00) Dollars as of February 9, 1996.

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8. That Petitioner has demanded support monies from Respondent but he has willfully and contumaciously refused to pay.

9. That respondent has sufficient funds to cure the arrearage and to pay current support but that respondent has deliberately and willfully refused to pay.

10. That Petitioner is unable to support the minor children without the support that Respondent has been ordered to pay.

11. That Petitioner is unable to pay her attorney for the necessity of bringing this action before the court.

12. That Petitioner has no other remedy at law.

WHEREFORE, Petitioner prays this Honorable Court for one or more of the following remedies:

A. That a rule be entered against Respondent instanter for failure to pay child support.

B. That Respondent be found in contempt of court for failure to comply with the court ordered support obligation and the Court order appropriate sanctions.

C. That respondent be made to immediately pay all past support totalling Twelve Thousand Six Hundred Eighty-Three (\$12,683.00) Dollars to Petitioner and to resume payments of current support.

D. That respondent pay petitioner's attorney's fees for the necessity of bringing this action.

E. Any other relief this Court deems just and proper

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COUNT II

HEALTH INSURANCE

1. NOW COMES the Petitioner, JANE E. RADULOVITCH, and in support of her Petition for Rule To Show Cause against Respondent, WILLIAM RADULOVICH, re-alleges paragraphs 1 thorough 12 and states as follows:

13. That in addition said judgment entered August 12, 1985 provided in pertinent part:

"A Husband agrees to keep and maintain the minor children of the parties on his medical, hospital and health insurance policy, and Husband further agrees to continue to maintain such insurance coverage for the benefit of the parties' dependent children until said children have completed their college education or have otherwise emancipated, provided, however, that said children remain eligible for insurance coverage."

14. That Respondent, WILLIAM RADULOVICH discontinued all medical, health and hospitalization insurance on the minor children and has not provided said insurance for the last seven years.

15. That because of Respondent's failure to provide insurance Petitioner has had to pay for and provide all medical, health and hospitalization insurance on herself and the minor children.

16. That Petitioner has incurred and paid medical premiums of One Hundred (\$100.00) per month, totaling in excess of Eight Thousand Four Hundred (\$8,400.00) Dollars due to Respondent's failure to provide said insurance.

17. That respondent has sufficient funds to pay for said insurance and medical bills but that respondent has deliberately

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and willfully refused to pay.

18. That Petitioner has demanded payment for said insurance and medical premiums from Respondent but he has willfully and contumaciously refused to pay.

19. That it is an undue hardship on Petitioner to provide medical, health and hospitalization insurance for the minor children that Respondent has been ordered to pay.

20. That petitioner is unable to pay her attorney for the necessity of bringing this action before the court.

21. That petitioner has no other remedy at law.

WHEREFORE, Petitioner prays this Honorable Court for one or more of the following remedies:

A. That a rule be entered against Respondent instanter for failure to provide medical, provide health and hospitalization insurance on the minor children.

B. That Respondent be found in contempt of court for failure to comply with the court ordered insurance obligation and the Court order appropriate sanctions.

C. That respondent be made to immediately pay to Petitioner Eight Thousand Four Hundred (\$8,400.00) Dollars for all past insurance premiums incurred by Petitioner and to immediately provide proof of hospitalization insurance on the minor children.

D. That respondent pay petitioner's attorney's fees for the necessity of bringing this action.

E. Any other relief this Court deems just and proper.

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COUNT III

COLLEGE EXPENSES

1. NOW COMES the Petitioner, JANE E. RADULOVITCH, and in support of her Petition for Rule To Show Cause against Respondent, WILLIAM RADULOVICH, re-alleges paragraphs 1 thorough 21 and states as follows:

22. That in addition said judgment entered August 12, 1985 provided in pertinent part:

"A. To the extent of their financial abilities, Husband and Wife agree to provide their children with the financial assistance necessary to enable them to secure and to attend an accredited undergraduate college institution after completion of high school."

23. That in September of 1993 when the parties oldest child, BRIAN began attending college the parties agreed that Respondent would contribute Three Hundred Thirty-Seven (\$337.00) Dollars per month towards BRIAN's college expenses.

24. That Respondent has failed to make this contribution for approximately the last twelve months and Petitioner has had to pay her contribution and Respondent's contribution to BRIAN's college.

25. That Respondent now owes Petitioner approximately Four Thousand Forty-Four (\$4,044.00) Dollars for his failure to pay his share of college expenses.

26. That Petitioner has demanded the college expense payments from Respondent but he has willfully and contumaciously refused to pay.

27. That Respondent has sufficient funds to pay these college expenses but that Respondent has deliberately and

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willfully refused to pay.

28. That the parties second oldest child, STACY began attending college in September of 1995.

29. That because of a scholarship that she has earned, STACY's college expenses for the school year of 1995-1996 is approximately Two Thousand (\$2,000.00) Dollars.

30. That Respondent is well able to contribute to the costs of STACY's college expenses.

31. That Petitioner is unable to pay the college expenses of the minor children without the continued contribution of the Respondent.

32. That Petitioner is unable to pay her attorney for the necessity of bringing this action before the court.

WHEREFORE, Petitioner prays this Honorable Court for one or more of the following remedies:

A. That a rule be entered against Respondent instantor for failure to pay his share of college expenses for the minor child, Brian as agreed.

B. That Respondent be made to immediately pay to Petitioner the sum of Four Thousand Forty-Four (\$4,044.00) Dollars for her payment of BRIAN's college expenses on Respondent's behalf.

C. That Respondent be ordered to contribute to the present and future college expenses of the parties' children, BRIAN and STACY.

D. That Respondent pay Petitioner's attorney's fees for the

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necessity of bringing this action.

E. Any other relief this Court deems just and proper

COUNT IV

LIFE INSURANCE

1. NOW COMES the Petitioner, JANE E. RADULOVITCH, and in support of her Petition for Rule To Show Cause against Respondent, WILLIAM RADULOVICH, re-alleges paragraphs 1 thorough 32 and states as follows:

33. That in addition said judgment entered August 12, 1985 provided in pertinent part:

"A. On the effective date of this Agreement, Husband agrees to permanently maintain the existing life insurance on his life, naming the minor children of the parties, BRIAN W., STACY E., and ERIN E. as irrevocable beneficiaries during their minority and for an additional four (4) years while youngest child is attending college. That after Husband's obligation of support in accordance with Article III of this Agreement, and Husband's obligation to share in the providing of a college education for the minor children ceases, then Husband shall be free to cancel the insurance coverage under this article, or to designate any other beneficiary of his choice.

34. That based on information and belief Respondent no longer has a life insurance policy on his life with the children named as irrevocable beneficiaries.

35. That based on information and belief Respondent has not maintained said policy for several years.

36. That Respondent has refused to provide Petitioner with proof of said policy.

37. That the it is an undue hardship on Petitioner and the

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minor children to be denied the support protection provided by said life insurance policy.

38. That petitioner is unable to pay her attorney for the necessity of bringing this action before the court.

39. That petitioner has no other remedy at law.

WHEREFORE, Petitioner prays this Honorable Court for one or more of the following remedies:

A. That a rule be entered against Respondent instanter for failure to maintain a life insurance policy in accordance with the Judgment for Dissolution.

B. That Respondent be found in contempt of court for failure to comply with the court ordered insurance obligation and the Court order appropriate sanctions.

C. That respondent be made to immediately procure and maintain a life insurance policy in accordance with the terms of the Judgment and to provide Petitioner with proof thereof.

D. That respondent pay petitioner's attorney's fees for the necessity of bringing this action.

E. Any other relief this Court deems just and proper

Jane E. Radulovitch Sittkowski
JANE E. RADULOVITCH

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CERTIFICATION

Under the penalties as provided by law pursuant to Chapter 110, Section 1-109 of the code of Civil Procedure, the undersigned certifies that the statements set forth herein are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Jane E. Radulovich Stokanich
JANE E. RADULOVITCH

LAW OFFICES
OF MARY C. THOMPSON
18115 Dixie Highway
Homewood, IL 60430
708/799-0051

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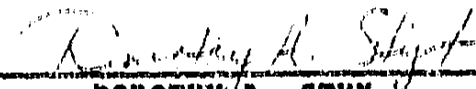
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STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

ATTORNEY'S STATEMENT

I, the undersigned, state that I represent the party who has executed the foregoing pleading. My business address is 18115 Dixie Highway, Homewood, Illinois 60430. I certify that I have read the foregoing pleading and that to the best of my knowledge, information and belief, formed after reasonable inquiry of my client, said pleading is well grounded in fact and is warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law, and that said pleading is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.



DOROTHY A. STYX
Attorney No. 31070

LAW OFFICES OF MARY C. THOMPSON
18115 Dixie Highway
Homewood, IL 60430
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Attorney No. 31070

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