

# UNOFFICIAL COPY

0 3 3 1 1 3 6 6

MORRIS HAAS

ATTORNEY AT LAW

SUITE 4005

135 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60603

(312) 372-4568

March 25, 1987

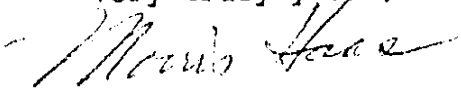
Ms. Nancy Donlon  
Attorney at Law  
8072 W. 95th St.  
Hickory Hills, Illinois 60457

Re: The Marriage of Mary Beth Simon  
vs: Richard Simon  
84 D 10823

Dear Ms. Donlon:

Please be advised that all fees due me from Mary Beth Simon concerning the captioned matter have been paid in full.

Very truly yours,



MORRIS HAAS  
MH:hs

Property of Cook County Clerk's Office

# UNOFFICIAL COPY

0 3 3 1 1 3 6 6

EDWARD J. McGOVERN  
ATTORNEY AT LAW  
3318 WEST 95TH STREET  
EVERGREEN PARK, ILLINOIS 60642  
OFFICE (312) 425-5070

April 14, 1987

Mr. Richard Simon  
12215 South Pulaski  
Alsip, Ill. 60658

RE: Simon v. Simon  
84 D 10823

To Whom It May Concern:

Please be advised that all attorneys fees and costs relating to the above matters have been paid in full by Mr. Richard J. Simon.

Very truly yours,

  
Edward J. McGovern

EJM/kr

Clerk's Office

UNOFFICIAL COPY

3611366

0 3 3 1 1 3 6

(10-84) CCDCH-6

PLACITA JUDGMENT

UNITED STATES OF AMERICA

STATE OF ILLINOIS,  
COUNTY OF COOK

ss.

LOUIS J. HYDE

PLEAS, before the Honorable .....  
one of the Judges of the Circuit Court of Cook County, in the State of Illinois, holding a branch Court of said  
Court, at the Court House in said County, and State, on ... -JULY, 3rd... ..  
in the year of our Lord, one thousand nine hundred and ... -85 ..... and of the Independence  
of the United States of America, the two hundredth and ... -TENTH .....

PRESENT: - The Honorable . . . . . **LOUIS J. HYDE** . . . . .  
Judge of the Circuit Court of Cook County.

RICHARD M. DALEY, State's Attorney

RICHARD J. ELROD, Sheriff

Attest: MORGAN M. FINLEY, Clerk.

*2 Receipts attached  
Morgan M. Finley  
July 3rd*

Property of Cook County Clerk's Office

3611366

# UNOFFICIAL COPY

03311336

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

IN RE: THE MARRIAGE OF  
MARY BETH SIMON, Petitioner  
and  
RICHARD SIMON, Respondent.

No. 84 D 10823

ENTERED  
CLERK OF THE CIRCUIT COURT  
MORGAN M. FINLEY  
JUL 3 - 1985  
JUDGE EDWARD J. HYDE  
DEPUTY CLERK

### JUDGMENT FOR DISSOLUTION OF MARRIAGE

This day came again the petitioner, MARY BETH SIMON, by Peggy C. [Name] of the firm of DANNEN, SPANE, HEYMAN & HAAS, her attorneys, and this cause came on for hearing on the Petition for Dissolution of Marriage of Petitioner, MARY BETH SIMON, and the Response thereto of the Respondent, RICHARD SIMON; the Petitioner appearing in open Court in her own proper person and by and through her attorneys; and the Respondent being represented in open Court by and through his attorney, Edward J. McGovern; and the Court having heard the testimony in open Court of the Petitioner in support of the allegations contained in her Petition for Dissolution of Marriage (a certificate of which evidence is attached hereto); and the Court having considered all the evidence, and now being advised in the premises, FINDS that:

- A. This Court has jurisdiction of the parties hereto and of the subject matter hereof.
- B. The Petitioner was domiciled in the State of Illinois at the time the Petition for Dissolution of Marriage was commenced and has maintained a domicile in the State of Illinois for ninety (90) days next preceding the making of the findings;
- C. The parties were married on the 14th day of May, 1966, and said marriage was registered at Chicago, Cook County, Illinois.

AGREEMENT ATTACHED

3611366

85084 33

# UNOFFICIAL COPY

0 3 5 1 1 3 5 6

D. Three children were born to the parties as a result of the marriage, namely: CATHERINE, born April 22, 1967; RICHARD, born March 31, 1968; and STEVEN, born February 13, 1973. No children were adopted by the parties, and the Petitioner is not now pregnant.

E. The Court finds that at all times during the marriage the Petitioner conducted herself toward the Respondent as a true, affectionate and faithful wife.

F. The parties lived and cohabited together from the time of the marriage until on or about July, 1984; and since that time have ceased to live together as husband and wife.

G. Without cause or provocation by the Petitioner, the Respondent has been guilty of extreme and repeated mental cruelty toward the Petitioner.

H. The Petitioner has proved the material allegations of her Petition for Dissolution of Marriage by substantial, competent and relevant evidence, and that a Judgment of Dissolution of Marriage should be entered herein.

I. The Court further finds that the parties have knowingly, intelligently, and willingly entered into a written agreement settling and adjusting between themselves the questions of custody, child support, maintenance, their property rights and any rights arising out of their marital relationship, which agreement and each and all the provisions and terms thereof are included in this Judgment of Dissolution of Marriage and are binding upon the parties hereto. Said agreement is as follows. \_\_\_\_\_

3611366  
/ / /

# UNOFFICIAL COPY

0 3 5 1 1 3 6 6

## AGREEMENT

IN MEMORANDUM, this Agreement is made and entered into this 8th day of May, 1985, by and between RICHARD J. SIMON, hereinafter referred to as "Husband;" who resides in the City of Oak Forest, County of Cook and State of Illinois; and MARY BETH SIMON, hereinafter referred to as "Wife," who resides in the City of Palos Hills, County of Cook and State of Illinois;

## WITNESSETH

WHEREAS, the Parties hereto had been married on the 14th day of May, 1966; and said marriage having been registered at Chicago, Cook County, Illinois, and

WHEREAS, three children were born to the parties as a result of the marriage, namely: CATHERINE SIMON, Born April 22, 1967; RICHARD SIMON, JR., born March 31, 1968; and STEVEN SIMON, born February 13, 1973. No children were adopted by the parties, and the Wife is not now pregnant, and

WHEREAS, in consequence of disputes and unhappy differences, the parties hereto have heretofore separated to the extent that they are not living together and cohabiting as Husband and Wife, and in view of the intention of both Husband and Wife to live so separate and apart, and in view of the fact that the Wife has, on the 5th day of June, 1984, filed her Petition for Dissolution of Marriage in the Circuit Court of Cook County, Illinois, known as Case No. 84 D 10823, charging the Husband with mental cruelty; and said Petition for Dissolution of Marriage is now undetermined and pending in said Court; and

WHEREAS, the parties hereto without collusion or agreement to obtain a Judgment for Dissolution of Marriage in the pending proceeding now on file in

3611366

851084 35

# UNOFFICIAL COPY

0 3 5 1 1 3 3 6

the Circuit Court of Cook County, Illinois, under Case No. 84 D 10823, but solely for the purpose of adjusting and settling forever all of their respective claims of property rights, dower rights, homestead rights, maintenance and support, and any rights of property growing out of the marriage relationship existing between the parties hereto, one with the other, have agreed upon a settlement of all of their said respective financial and property rights, rights of dower, rights of homestead, inheritance, maintenance and support, and, particularly, such property rights and claims acquired by both of them during their marital life and

WHEREAS, a full and complete disclosure has been made by each of the parties hereto, one to the other, of all property, real, personal and mixed, owned by either of them, and the parties acknowledge that each has been fully informed as to the wealth, property, estate and income of the other and of his or her respective rights in the premises; that each is conversant with all of the property possessed by the other and the value thereof, and that no representations as to value of the property, estate or income of either party have been made by either party to the other;

NOW, THEREFORE, for and in consideration of the sum of One Dollar (\$1.00) each to the other in hand paid, the receipt whereof is hereby acknowledged, and in consideration of the mutual terms, covenants and conditions contained in this Agreement, the parties hereto mutually agree as follows:

1. All of the preamble clauses hereinabove set forth in this Agreement are hereby incorporated by reference and are to be considered as part of this Agreement, and both of the parties are entering into same with full knowledge of the foregoing facts and agree to the truth and correctness thereof.

# UNOFFICIAL COPY

0 0 3 1 1 3 3 6

2. Husband and Wife shall have joint custody of the minor children, namely: CATHERINE SIMON, RICHARD SIMON, JR., and STEVEN SIMON. Physical custody of said children shall be with the Husband.

3. The following items of personal property shall be the exclusive property of the Wife:

Hamburger Grill  
Tupperware Items  
Lennox Madonna  
1 Slow Cooker (but not the yellow one)  
2 Lamps from Bedroom  
1 Exercise Bike  
Fryer  
1 3-Speed Bicycle  
White Christmas Tree and Decorations  
Tablecloths and Napkins  
Sewing Machine  
1 Phone  
Bathroom Scale  
Camera  
Bedroom Set, consisting of dresser  
with mirror, 1 high boy chest,  
1 headboard, 1 queen size bed,  
1 night table  
Hope Chest  
3 Living Room Tables  
2 Living Room Lamps  
Curio Cabinet  
All Lennox Pieces  
All Waterford Crystal (24 glasses)  
12 Place Settings of China  
12 Place Settings of Silverware  
Card Table and 4 Chairs  
All Sterling Pieces  
Small Television  
2 Sets of Sheets for Queen Size Bed  
Wall Hanging in Bathroom (Hand Deep Painted)  
Wall Hanging in Living Room (Hand Painted)  
Some Photos of Children  
Some Knick Knacks  
Electric Broom Clock Radio

4. The Husband agrees to maintain life insurance for the benefit of the children.

5. It is agreed that the Husband shall maintain hospitalization insurance for the benefit of the minor children until the children attain the



# UNOFFICIAL COPY

0 3 3 1 1 3 3 6

age of 18 years or graduate from highschool, whichever comes later. It is further agreed that husband and wife shall be responsible for the extraordinary medical, dental and optical expenses not covered by said insurance. It is further agreed that the husband shall be responsible for the ordinary medical, dental and optical expenses of the minor children until the children attain the age of 18 years or graduate from highschool, whichever comes later.

6. It is further agreed that each of the parties shall pay their own attorney fees which are directly related to this dissolution proceeding.

7. Each party agrees to waive, release and relinquish any and all of their rights, claims or interest in and to maintenance, dower, courtesy homestead, jointure, or any other common law or statutory right or claim that either now has or to which they may be entitled in the future by virtue of their marriage.

*Eva*  
*MS*  
8. The Husband shall have the right to live in the marital residence, and shall have exclusive possession of the marital home, known as 5721 Gainsborough Place, Oak Forest, Illinois, until the youngest child attains the age of 18 years, at which time the real estate shall be sold and the net proceeds of sale divided equally between the parties hereto. In the event the Husband remarries, or cohabits with another person in said residence, the house shall immediately be sold, and the net proceeds divided equally between the parties hereto. The Husband shall be entitled to a credit for any principal reduction from July, 1984, and a further credit for any capital improvements from the date of dissolution to the date of sale.

9. Each of the parties agree that he or she will, upon the demand of the other any time hereafter, executed any and all instruments and documents as may be reasonably necessary to convey, transfer, assign or release their respective interest in any property belonging to the other, said documents to be executed within a reasonable period of time.

3611366

851184 33

# UNOFFICIAL COPY

0 3 5 1 1 3 6 6

10. It is mutually understood and agreed that, except for the disposition of the marital property hereinabove specifically divided, any and all other property acquired by both Husband and Wife, and particularly the respective personal property of both of the parties hereto, has been segregated and divided between them, and that each of them has in his or her possession his or her rightful property.

11. Any executed copies of this Agreement, for all intents and purposes, shall be considered and treated as the original.

12. This Agreement shall be in full force and effect and binding upon the parties hereto only upon the entry of a Judgment for Dissolution of Marriage in the case of IN RE: THE MARRIAGE OF MARY BETH SIMON, Petitioner, AND RICHARD J. SIMON, Respondent, Case No. 84 D 10823, in the Circuit Court of Cook County, Illinois, and the terms and conditions of this Agreement have been incorporated in and made a part of said Judgment for Dissolution of Marriage.

13. This Agreement contains the entire understanding of the parties; there are no representations, warranties, promises, covenants or undertakings other than are herein set forth.

14. The Wife shall waive any right, title or interest in the family business known as Dick Simon's Meat Market, and Husband shall hold the Wife harmless for any of said business debts.

IN WITNESS WHEREOF, the parties hereto have hereunto set their hands and seals this 8th day of May, 1985.

Mary Beth Simon  
Mary Beth Simon, Petitioner

Richard J. Simon  
Richard J. Simon, Respondent

# UNOFFICIAL COPY

0 8 5 1 1 3 6 6

ON MOTION OF SAID ATTORNEYS FOR THE PETITIONER, IT IS HEREBY ORDERED and ADJUDGED AS FOLLOWS:

1. The parties are awarded a Judgment of Dissolution of Marriage, and the bonds of matrimony existing between the Petitioner, MARY BETH SIMON, and the Respondent, RICHARD SIMON, be and are hereby dissolved, and the marriage is accordingly dissolved as to both parties.

2. Both the petitioner and the respondent are awarded joint custody of the minor children of the parties, with physical possession of the children with the respondent. The minor children of the parties are: Richard, age 17 years; and Steven, age 12 years.

3. The question of child support is reserved for future determination by the Court.

4. The written settlement agreement between the petitioner and the respondent, as hereinabove set forth in full is made a part of this Judgment of Dissolution of Marriage, and all of the terms and provisions of said agreement are ratified, confirmed and approved as the orders of this Court to the same extent and with the same force and effect as if said provisions were in this paragraph set forth verbatim as the judgment of this Court; each of the parties hereto shall perform under the terms of said agreement.

5. Each of the parties hereto will, promptly upon demand by the other party, execute and deliver to such other party any and all documents that may be necessary to effectuate and fulfill the terms of this judgment.

6. Any right, claim, demand or interest of the parties in and to maintenance for themselves, whether past, present or future, and in and to the property of the other, whether real, personal or mixed, of whatsoever kind and nature and wheresoever

85084 10

3611366

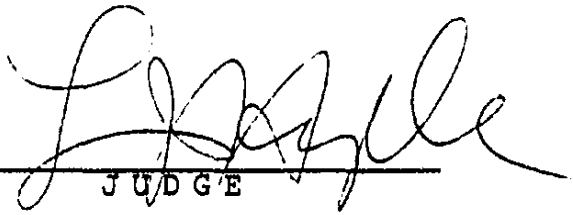
# UNOFFICIAL COPY

0 3 5 1 1 3 5 6

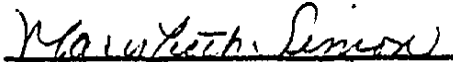
situated, including but not limited by homestead, succession and inheritance, arising out of the marital relationship or any other relationship existing between the parties hereto, except as expressly set forth in the aforesaid agreement, is forever barred and terminated.

7. The Court expressly retains jurisdiction of this cause for the purpose of enforcing all of the terms of this Judgment of Dissolution of Marriage, including the written settlement agreement as hereinabove set forth.

ENTER:

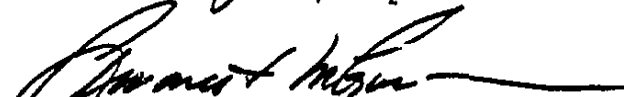
  
\_\_\_\_\_  
J U D G E

APPROVED AS TO FORM:

  
\_\_\_\_\_  
MARY BETH SIMON, Petitioner

  
\_\_\_\_\_  
Attorney for Petitioner

  
\_\_\_\_\_  
RICHARD J. SIMON, Respondent

  
\_\_\_\_\_  
Attorney for Respondent

LANNEN, CRANE, HEYMAN & HAAS  
Attorneys for Petitioner  
120 South LaSalle Street  
Chicago, Illinois 60603  
Telephone: 312/641-6777  
Firm ID #02542

85081 11

3611366



# UNOFFICIAL COPY

1  
~~1185-94~~  
14

611366

611366

Property of Cook County Clerk's Office

IDENTIFIED NO.	REGISTERED MAIL MAY 1 1978 611366
-------------------	-----------------------------------------

SAFECO TITLE INSURANCE CO.  
2 N. LA SALLE ST.  
SUITE 1700  
CHICAGO, IL. 60602

MI-33958