

Petition for Dissolution of Marriage. Therefore, there exists personal jurisdiction over the parties per section 401 of the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/401(a)).

5. That irreconcilable differences between TINA and JEFFREY have caused an irretrievable breakdown of their marriage. Efforts at reconciliation have failed, and future efforts at reconciliation would be impracticable and not in the best interests of either of the parties or their family.

6. That without cause or provocation by the Plaintiff, JEFFREY has been guilty of extreme and repeated mental cruelty toward TINA. Therefore, there also exists grounds for dissolution of this marriage, if Defendant contests a dissolution based on irreconcilable differences.

7. TINA has no knowledge of a petition for dissolution of this marriage pending in any other county or state.

8. That NUMBER children were born to the parties during the marriage, namely:
LIST CHILDREN'S NAMES, BIRTHDATES, AGES.

9. That no other children were born to or adopted by the parties, and TINA is not pregnant.

10. The parties do not have any agreement or plan in place as to the custody of their minor children once they are divorced.

11. Both TINA and JEFFREY are a fit and proper parents to be awarded joint legal custody of the parties' minor children.

12. It would be in the minor children's best interests for TINA to be designated as their primary residential custodian, and for JEFFREY to be awarded an appropriate schedule of visitation and parenting time to spend with them.

13. That on information and belief, and pursuant to the disclosure requirements of Ill. Sup. Ct. Rule 902(d), Plaintiff alleges that none of the children in this case are the subject of any other child custody proceeding pending before another division of the circuit court, or another court or administrative body of Illinois or of any other state, an Indian tribe, or a foreign country, and no order affecting the custody or visitation of the children has been entered by the circuit court or any of its divisions, or by another court or administrative body of Illinois or of any other state, an Indian tribe, or foreign country.

14. There are not presently any arrangements in place between the parties regarding payment of child support, and any other expenses of the minor children.

15. There are not presently any arrangements between the parties concerning the payment of spousal maintenance, formerly known as alimony, from either party to the other.

16. There are not presently any arrangements between the parties concerning the allocation of their marital property.

17. The parties, during their marriage, have acquired marital property, including, but not limited to, bank accounts, investment accounts, retirement accounts, vehicles, furniture, and the marital residence located at ADDRESS.

18. During their marriage, the parties have also incurred certain marital debt, which now also needs to be fairly allocated between them.

WHEREFORE, Plaintiff, TINA LASTNAME, prays the Court for the following relief:

A. That a judgment for the dissolution of this marriage be entered;

B. For entry of an order awarding TINA and JEFFREY joint legal custody of their minor children;

C. For entry of an order designating TINA as the primary residential custodian of the minor children, and awarding JEFFREY an appropriate schedule of visitation and parenting time with the same;

D. For entry of an order directing JEFFREY to pay TINA child support for the care of the minor children, pursuant to the applicable statutory guidelines;

E. For entry of an order directing JEFFREY to pay TINA appropriate spousal maintenance, formerly known as alimony, for a period of time;

F. For entry of an order classifying the parties' various property as marital or non-marital;

G. For entry of an order awarding all TINA's non-marital property to her.

H. For entry of an order fairly and equitably apportioning the parties' marital property between them;

I. For entry of an order fairly and equitably apportioning the parties' marital debt between them;

J. That TINA be granted any other relief the Court deems just and equitable under the circumstances.

Respectfully submitted,
RATHBUN, CSERVENYAK & KOZOL LLC.

By: _____

VERIFICATION PURSUANT TO 735 ILCS 5/1-109

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, and under the penalty of perjury, the undersigned states that she has read this pleading, that she knows the contents thereof, and that the statements set forth herein are true and correct except to any matters specifically alleged to be on information and belief, and as to such matters the undersigned certifies as aforesaid that she believes the same to be true.

By: _____
TINA LASTNAME

Rathbun, Cservenyak & Kozol LLC.
Adam C. Gynac
ARDC NUMBER
24201 West Main Street
Plainfield, Illinois 60544
(815) 577-9763