



FAMILY LAW

The newsletter of the Illinois State Bar Association's Section on Family Law

Chair's column

By Rory Weiler

It is hard for me to believe that a year has passed since that meeting in St. Louis when I took, with trepidation, the chairmanship of our Family Law Section Council. As confident as I was then of the direction in which we were heading, and the support of the members of the Council, I must say that actually taking the reins was at once, an intimidating and inspiring experience. I believe now, as I did then, that our members would sustain us, and provide the leadership, good counsel and hard work that have been the hallmark of the Council for many years. Providently, I was, and remain right in that regard, and I am pleased to hand over the chair to Kim Anderson with the Council I think, no worse off for my efforts, and I hope, as Henry VIII is reported to have said of Anne of Cleves, "as much a virgin as I found her."

There are, of course, too many people to thank for making my turn at the chair an enjoyable one, and I hope one considered successful.

In some past columns, I've noted the contributions of Jim Covington, Jeanne Heaton, Tiffany Bordenkircher and others. They all will, like the Dude, abide, and continue to quietly, effectively and professionally devote themselves for the betterment of our association and the benefit of our members. I would be remiss if I didn't recognize the hard work and dedication of Mary Grant, our staff liaison, who was tireless in her attention to my incessant (and often insipid) requests for information and assistance. Working with great folks like this has confirmed my conviction that organizational strength is created and sustained when leadership flows up, not down. At the risk of being saccharine, I appreciate everything our staff people have done to make my job not just easier, but one of the most enjoyable things I have ever experienced professionally.

I have also been blessed with experienced

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Broken engagements

By Kelley Menzano, Esq. & Ross Levey, Esq., Yavitz & Levey, LLP

Today, engagements and wedding preparations have taken on epic proportions. Between the popularity of television shows such as "Say Yes to the Dress," "Amazing Wedding Cakes," "My Fair Wedding," and "Bridezillas" as well as the full press coverage of celebrity weddings (Hilary Duff, Katy Perry, Chelsea Clinton and Heidi Montag were among those tying the knot in 2010 and the Royal Wedding of Kate Middleton and Prince William stole headlines in 2011), wedding planning has become a spectator sport.

The emphasis on creating the dream wedding has created an entire industry that has swelled in

size in recent years. In 2009, the average cost of a wedding was in excess of \$30,000 (http://www.bridalassociationofamerica.com/Wedding_Statistics/) and the market value for the wedding planning industry was estimated to be over \$71 billion (http://www.bridalassociationofamerica.com/Wedding_Statistics/).

So what happens when, despite the big spending, the dream wedding doesn't come true? Based on pre-cana statistics kept by the Catholic Church, about one in five couples

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Chair's column

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and devoted colleagues who have worked endlessly to achieve the goals I had set for us with my characteristic ambition and hubris. Our committees have put in hundreds of hours to review, create and suggest needed changes to the IMDMA in a variety of areas, including child support, parentage, maintenance, dissipation, the rights of our military members and other areas. We have put on CLE presentations on topics ranging in character from the basic to advanced levels of experience. We completed, thanks to Pam Kuzniar's unwillingness to accept no for an answer, and the considerable largesse of Stout, Risius and Ross, UBS, Pam herself and donations from the law firms of Berger Schatz and Marilyn Longwell, an incredibly successful road trip to New Orleans, which featured the exclusive world premiere of Rico Mirabelli's music video. I'm sure that New Orleans 2011 will be followed by similar CLE adventures in the future, and that we will continue to attract capacity crowds with our creative and innovative approach to CLE. As far as Rico's encore/show topper goes, human sacrifice has been mentioned, but no specific plans have yet been made. My advice: be sure to attend the next caselaw update.

And so, as the Chairman of the Board so eloquently noted, the end is near, and I face the final curtain. I could, of course, end this soliloquy here, and move over. However, I have never gone gently into the good night, and I sure am not going to start here. What I have to say in my swan song will no doubt sound like apostasy to some in the family practice. Perhaps, it is, but I assure you, it is also heartfelt. I ended last month lamenting our client's egocentric attitudes, and encouraging new attention to their agendas and motivation. I wish to finish this month with some observations of our practice, and how we divorce lawyers, like the moth to the flame, too often allow ourselves to be sucked into the life crushing black holes of our client's crusades.

We customarily deal with people experiencing the worst emotional trauma ever visited upon them. Unfortunately, we also often make that experience worse and even more traumatic than it needs to be. Often, our clients depend upon us for much more

than legal advice, and we find ourselves thrust into the role of friend, confidant and confessor. They rely upon us not just for legal advice, but for practical advice and counsel as they go through the process. They need us to take away the peanut M&Ms, sometimes, and tell them that litigation is not always the best, much less the only, means to the end. We must stay focused, and never lose sight of our professional responsibilities to not only the client, but the children, and the court as well. After thirty one plus years in the practice, I believe that in many cases, the divorce lawyer is no longer part of the solution, and not just a part of the problem, but in fact becomes the problem itself.

I'm not sure where, or frankly why, it started, but we all too often are consumed more by what we can do, than concerned about what we should do. We preen and posture, use invective and insult not because the situation calls for it, but simply as an homage to bloviation. Hence, the current trend to be the one who talks longest, loudest and least respectfully. I'm not sure if this is because this tactic resonates with the court, or if our judiciary simply doesn't care to control the courtroom and put an end to the drama which seems to have become entrenched in the family practice. Whatever the root cause, it seems to be more and more difficult to comport oneself with dignity, integrity and respect for the tribunal, and be an effective family law advocate. We seem to be losing sight of the fact that the lives of our clients, and their *children's* lives are at stake, so that we can focus on delivering "the show." Form now overrules substance, and often substance is a mere afterthought. Rude and uncivil behavior has become a tool to market the practice to an ever angrier client pool. Why?

Perhaps because our law schools keep churning out graduates, with hundreds of thousands of dollars of student loans, and families to feed, and a lack of the real job opportunities most of us elderly practitioners had with established firms that provided a mentor who could teach us the practice. Our young colleagues seem to be more inclined to the "dark side" of the force (practice) for a couple of reasons. The first being that they are a generation reared on Boston Legal, and

not Perry Mason, and therefore, the over the top theatrical represents the only legal role model that they know. Forced to hang out a shingle to support their families, and without a legal mentor to turn to for guidance, they unfortunately assume that loud, rude and disrespectful is, to paraphrase Dean Vernon Wormer, the way to go through life.

Secondly, and more insidiously, our neophyte brethren see examples in the more experienced among us that engage in these very same tactics, and therefore assume that pedantry and petulance are the pathways to professional success. Daily we rail against the nature of the practice, the stress it imposes upon us, and the impact it has on our lives. "It kills you from the inside out," a colleague once told me. Yet day in and day out, we take spurious positions, advance dubious arguments and indulge in personal attacks simply because we can, or worse yet, because our clients think that is what they are paying for. We create the very atmosphere that causes our own stress. We have allowed the family practice to descend from an aspiration to a noble, caring and people oriented profession to a job more closely resembling the floor of the Roman Coliseum during the First Century AD. We have, sadly, become the gladiators, willing and unwilling, performing for the amusement of the crowd, in this case, our clients, who often care nothing about the outcome, and are only interested in the amusement derived from the contest.

Obviously, we can and should aspire to a higher calling, a more noble purpose. We should put the best interests of the children first, and foremost, and refuse to allow our talents to be used to play with children as means to a different, more strategically advantageous end. We need to educate our clients about the devastation wrought by a scorched earth litigation philosophy, and enlighten them to the reality of having to deal with the other parent for the rest of their lives. It is, in my estimation, just as important to prepare our clients for life after divorce as it is for life during the divorce. We should respect the dignity of the court, and the judges before whom we practice, and by our example, educate our clients as to how to comport themselves in that forum. Remember, we salute the uniform, not the person

wearing it. We should embrace the concept of doing the right thing, regardless of reward or recompense, and encourage our clients to do likewise.

Crazy? Unlikely? Unrealistic? Downright dumb? Idealistic? Maybe. But interestingly, our colleagues in other legal disciplines have, and continue to comport themselves professionally. Are there personality conflicts and bad lawyering in the tort field? Of course there are, but if we examine other practice areas, we will have to candidly admit that they are the rare exception, not the day to day experience. Our colleagues in other areas of concentration also apparently enjoy success without acting as if they were carnival barkers and strip joint maître d's. Ask yourself

this question: Is this really why I went to law school? Ask another: Am I doing the right thing? We can hardly criticize our clients for swimming in the cesspool that divorce cases tend to create if we ourselves are creating and pumping the waste into the pool.

My final message, albeit a preachy one, is simple. I believe we are professionals. We need to act like professionals. Resist and refuse the temptation to become as personally involved in our client's divorce as our clients are. Follow the rules. Treat each other, and the court with respect. Be civil and courteous. Educate your clients, and train them about what to expect and how to behave. Take responsibility for your own actions, and require your clients to do the same. You will

be surprised at how much less emotional effort it takes to do the right thing, as opposed to creating conflict and confrontation. You will also be pleasantly surprised at the positive impact it will have on your practice in particular and your life in general. In short, try to leave the practice a little better than you found it. The practice of law is a gift, and a stewardship that brings with it the duty to preserve it for the lawyers of the future. Enjoy it, embrace it, and preserve, protect and cherish it. You will be better off for having done so.

Thank you all for your support, and I hope the next year is a productive and prosperous one for you all. Bonne chance, Ms. Kim, it's all yours now. ■

Broken engagements

Continued from page 1

split up after announcing wedding plans. (<http://www.theregoesthebride.com/press.cfm?l=167>). In the event of a broken engagement who keeps the ring and who is responsible for the wedding planning expenses? Emily Post, the famous American etiquette author, believes that the proper thing to do is to give the ring back to the giver regardless of the reasons for the broken engagement, Post, Emily, *Etiquette in Society, in Business, in Politics and at Home* Chapter XX (Funk & Wagnalls 1922). However, this is a case where proper etiquette and what is required by the law do not necessarily yield the same result.

Illinois

These questions and more will soon be addressed in two recently filed cases.

The case of attorney *Dominique Buttitta v. Vito Salerno*, Case No. 2010 L 014003 was filed in the civil law division on December 10, 2010 in Cook County for the "breach of promise to marry," "intentional infliction of emotional distress" and more than \$95,000 in damages (for the expenses of reserving the banquet hall, booking the live music, purchasing a wedding dress, flowers and lighting among other things) plus the cost of filing suit. Mr. Salerno promptly counter-sued alleging the decision to call off the wedding was mutual and seeking the return of the engagement ring, which is worth almost \$46,000. The suits were consolidated in January of 2011 and

most recently Judge Daniel Pierce denied Mr. Salerno's Motion to Quash a Records Subpoena directed to the priest who conducted the couple's pre cana counseling on April 18, 2011.

The case of attorneys *Lauren Serafin v. Robert Leighton*, Case No. 2011 L 02453 was filed on March 4, 2011 for many of the same reasons. In this case, after an alleged affair during the Mr. Leighton's bachelor party in Las Vegas the wedding was called off. Ms. Serafin's complaint has the same two counts as Ms. Buttitta's and seeks over \$62,814.71 in damages for many of the same expenses incurred by Ms. Buttitta. However, as of April 11, 2011 Ms. Serafin voluntarily dismissed her claims against Mr. Leighton and it is likely the matter was settled out of court.

Current Statutory Law

In Illinois, while there are many legal principles which can be applied in cases involving broken engagements, there is only one act which specifically addresses such issues. The Breach of Promise Act, 740 ILCS § 15/1-10 (West 2008), was enacted explicitly to govern the enforcement of actions based upon breaches of promises or agreements to marry because the legislature felt that such breaches have "been subject to grave abuses and [have] been used as an instrument for blackmail by unscrupulous persons for their unjust enrichment due to the indefi-

niteness of the damages recoverable in such actions and the consequent fear of persons threatened with such actions that exorbitant damages might be assessed against them." Id. at § 15/1. This statute further eliminated the possibility of monetary damages being awarded for emotional distress in such actions. Id. Damages are limited to the recovery of actual damages and punitive, exemplary, vindictive or aggravated damages are recoverable. Id. at § 15/2-3. The Breach of Promise Act also requires that the person who intends to file suit under this act must notify the person against whom the action is to be brought notice of their intention to file suit within three months from the date of the alleged breach of promise to marry. Id. at § 15/4. If such notice is not given the action is forever barred. Id. at § 15/5. The Breach of Promise Act also imposes a statute of limitations on such actions of 1 year after the cause of action accrues. Id. at § 15/6.

Current Case Law

Illinois case law has looked at the issues resulting from broken engagements from many angles.

In 1962, the Supreme Court of Illinois decided the case of *Prassa v. Corcoran*, 24 Ill.2d 289 (1962). In this case, the court had to decide whether the bride to be had any interest in property purchased by a couple during their engagement. Id. at 289. The property

was paid for solely by the husband to be but title was taken jointly. Id. Subsequently, over arguments regarding the decorating and furnishing of the property the wedding was called off and reconciliation attempts were unsuccessful. Id. at 291. The court decided that the evidence showed that husband to be had no intention of making a gift of the property to his fiancée prior to the consummation of the marriage and thus only a resulting trust and no beneficial interest was bestowed upon the wife to be at the time title was taken. Id. at 294. The court in this case was careful to point out, however, “[t]his is certainly not to suggest that a gift cannot be given by one engaged individual to another in contemplation of marriage.” Id. at 295.

In 1986, the Fifth District Appellate Court decided the case of *Harris v. Davis*, 139 Ill. App.3d 1047 (5th Dist. 1986). In this case the issue was precisely “whether a man who has given a woman an engagement ring is entitled to the ring or its value when his fiancée subsequently break the engagement.” Id. In this case the bride to be was out drinking with her girlfriends when her fiancée arrived and they got into an argument that became physical. Id. After being separated by another man in the bar, the bride to be threw her ring into a nearby field. Id. She informed her now ex-fiancée of the whereabouts of the ring but even with the aid of metal detectors he was unable to find it. Id. As a result he brought a small claims action seeking \$1,390, the cost of the ring. Id. At the trial court level, the judge found for the defendant reasoning that the physical altercation was what “triggered” the loss of the ring and that the plaintiff should be “made to share in the loss.” Id. However, on appeal, the Fifth District found that Illinois law is clear and well established that “a gift given in contemplated of marriage is deemed to be conditional on the subsequent marriage of the parties, and the party who fails to perform on the condition of the gift has no right to property acquired under such pretenses.” Id. at 1048. The court further reasoned that the parties did not dispute the fact that it was the defendant who broke the engagement and there are no specific allegations that the plaintiff’s actions caused the break up. Id. Therefore, the defendant failed to perform and is liable to the plaintiff for the value of the engagement ring. Id.

In 1994, the Second District Appellate Court decided the case of *Vann v. Vehrs*, 260 Ill.App.3d 649 (2d Dist. 1994). This case was a

replevin suit for the recovery of an engagement ring. Id. The plaintiff proposed to the defendant in August of 1988 but by June of 1989 the defendant had decided to postpone the wedding “indefinitely” but she refused to return the ring. Id. Despite the defendant’s motions to dismiss based on an expired statute of limitations and a failure to comply with notice requirements as set forth in the Breach of Promise Act, 740 ILCS 15/6 (West 1992), the trial court eventually found that the engagement was “mutually broken” and the defendant must return the engagement ring. Id. On appeal, the Second District Appellate Court looked at the legislative intent of the Breach of Promise Act and affirmed the trial court’s decision that it did not apply to an action in replevin for the return of an engagement ring. Id. at 651. The court acknowledged that rights to an engagement ring following a mutually broken engagement was an issue of first impression in Illinois and then reviewed the rulings of those jurisdictions which had ruled on the issue and sided with the majority reasoning that “an engagement ring is a gift conditional on the subsequent marriage of the parties, and when the condition is not fulfilled, the donee no longer has any right to the ring.” Id. at 652.

The most recent case on the issue of broken engagements was decided in 2009 when the Second District Appellate Court decided the case of *Carroll v. Curry*, 912 N.E.2d 273 (2d Dist. 2009). In this case the plaintiff sued the defendant in replevin for the return of the engagement ring as well as other items of personal property including a plasma television and audio equipment. Id. At the trial court level, the court ruled that the defendant must return the engagement ring but nonsuited the second count of the complaint involving the other items of personal property. Id. The defendant appealed on the basis that there was a genuine issue of material fact regarding the infidelity of the plaintiff and thus the cause of the broken engagement, and that the trial court had summarily decided the case using a no-fault approach. In its review, the appellate court focused on the fact that the nature of this action was in replevin. Id. at 274. Because the action was in replevin, the court found that fault was not an issue to be considered. Thus, the appellate court affirmed the decision of the trial court and the defendant was ordered to return the engagement ring to the plaintiff.

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Other Approaches

No Fault Approach

The Connecticut legislature has abolished actions for alienation of affection and breach of promise. Conn. Gen. State 52-572(b) (2008). The Connecticut case law reveals that an exception to abolishment of such claims are those actions which request the return of property. Using common law principles, the Connecticut court developed a no fault approach ruling consistently that once an engagement is broken the engagement ring should be returned to the person who gave it. See e.g. *Thorndike v. Demirs*, 44 Conn. L. Rptr. No. 1, 30 (October 15, 2007) (“because the engagement ring is a conditional gift, when the condition is not fulfilled its value should be returned to the donor no matter who broke the engagement or caused it to be broken”) (citations omitted). Some of the other jurisdictions which follow the no-fault approach are Kansas, See e.g. *Heiman*

v. Parrish, 262 Kan. 926 (1997), Iowa, See, e.g. *Fierro v. Hoel*, 465 N.W.2d 669 (Iowa Ct. App. 1990), New Jersey, See, e.g. *Aronow v. Silver*, 223 N.J. Super. 344 (1987), and New York, See e.g. *Marshall v. Cassano*, 2001 NY Slip Op. 40320U. Many jurisdictions are employing this approach because courts are hesitant to become involved emotional and personal aspects of family law. Many of these jurisdictions also follow the no fault approach to divorces and believe that the return of an engagement ring should be similarly handled.

Unconditional Gift Approach

In the case of *Albinger v. Harris*, 2002 WL 1226858 (Mont. 2002), the Montana Supreme Court ruled that an engagement ring is a completed gift. If the woman can prove that the engagement ring was a gift under the law (intent, delivery and acceptance) she will be allowed to keep the ring. Whether a ring is determined to be a gift may also depend on when it is given. Many courts have

ruled that if an engagement ring is given on a birthday or a holiday the ring a simple gift.

Implied Conditional Gift Approach

In California, the rightful owner of the ring after a broken engagement depends on which party decided to break the engagement. For example, if the person who received the ring is the one who is reneging on the engagement, then that person must relinquish the jewelry. (<http://www.cnn.com/2008/LIVING/personal/01/07/diamond.not.forever/index.html?iref=allsearch>) In practical terms, that means a fiancée will only get his ring back if his fiancée breaks off the engagement.

Conclusion

While the law in Illinois seems to indicate some willingness to follow the fault-based approach, the law in this state is still evolving. It will be interesting to see how the *Buttitta v. Salerno* case is decided. ■

Even divide among districts on post-decree appellate jurisdiction

By Jan R. Kowalski, Esq.

Illinois matrimonial law practitioners need to be aware of the even divide between the Appellate Districts as to post-judgment appellate jurisdiction. The four districts that have decided this issue are evenly divided with no room for compromise. The First and Third Appellate Districts hold that each post-dissolution motion is a separate action independently appealable without a Rule 304(a) finding. *In re Marriage of Carr*, 323 Ill. App. 3d 481 (1st Dist. 2001), *In re Marriage of A'Hearn*, No. 3-10-0831 (3rd Dist. 3/21/11). The Second and Fourth Appellate Districts, on the other hand, viewing a post-decree motion as a separate claim within the same action require a Rule 304(a) finding. *In re Marriage of Alyassir*, 335 Ill.App.3d 998 (2nd Dist. 2003); *In re Marriage of Gaudio*, 368 Ill. App. 3d 153 (4th Dist. 2006).

The post-decree issues are either a “separate action” or a “separate claim within the same action.” What might appear as splitting hairs, actually boils down to a philosophical debate as to the accessibility of the appellate court. Should appellate jurisdiction lie for each final post-decree order which will allow more appeals? Should appellate jurisdiction for final post-decree orders not having a

304(a) finding be limited so as to discourage piecemeal litigation? Absent legislation or Illinois Supreme Court review or rule amendment, the family law practitioner must be aware of the divergence between the Districts and be guided accordingly in order to properly invoke jurisdiction of the Appellate Court.

The Illinois Supreme Court addressed this issue in 1986 in the grandfather of cases, *In re Custody of Purdy*, 112 Ill. 2d 1 (1986) holding that the trial court’s ruling on the father’s post-decree motion for custody constituted a separate cause of action despite the mother’s summer visitation schedule remained undecided. The Court noted that the issue of custody raised in a post-decree motion was a separate matter and was not ancillary to any other issue. The Supreme Court ruled that “[a]n order for a change of custody in this context constitutes a final, and therefore appealable, order.” *Purdy*, 112 Ill. 2d at 5.

Effective February 26, 2010, the Illinois Supreme Court amended Rule 900 and added a Rule 900 series “to expedite cases affecting the custody of a child, to ensure the coordination of custody matters filed under different statutory Acts, and to focus child custody proceedings on

the best interests of the child, while protecting the rights of other parties to the proceedings.” Contemporaneously, the Illinois Supreme Court amended Rule 304(b) to add the *Purdy* holding expressly providing in Rule 304(b)(6) for custody orders to be appealable without the necessity of a special finding under Rule 304(a). The Court also contemporaneously amended Rule 306(a)(5) allow an interlocutory appeal if a trial court’s order affects the care and custody of unemancipated minors and amended Rule 306(b)(1) (eff. Feb. 26, 2010) to require a notice of appeal to be filed within 14 days.

The Third District recently entered the fray in *In re Marriage of A'Hearn*, No. 3-10-0831 (3rd Dist. 3/21/11). The Third District first noted that since the decision in *Purdy*, a split has developed among the Appellate Court regarding whether post-decree petitions are to be construed as new actions or as new claims within the original dissolution proceeding. The Third District in *A'Hearn*, followed the First District holding in *Carr*, finding that post-dissolution proceedings are generally new actions. The *A'Hearn* court noted that although the *Carr* approach will perhaps allow more appeals, it upholds the

trial court's intent in entering a dispositive order. The *A'Hearn* court further noted that holding otherwise would not serve the interest of justice, as one party would be able to defeat appellate jurisdiction simply by filing a separate, completely unrelated petition.

The Second and Fourth District view a post-decree petition to be a continuation of the original dissolution proceeding requiring a 304(a) finding discouraging piecemeal appeals. The Second District in *In re Marriage of Duggan*, 376 Ill. App. 3d 725 (2nd Dist. 2007), explained *in dicta* why it did not consider post-dissolution petitions to be separate actions relying on *In re Marriage of Kozloff*, 101 Ill. 2d 526 (1984) (holding husband's post-dissolution petitions were a continuation of the original dissolution proceedings so as not to trigger a change of venue). The *Duggan* court found it significant in *Purdy* that the trial court had made a Rule 304(a) finding, reasoning that *Purdy* merely stands for the proposition that judgment on a post-dissolution petition may be appealed, but

only with a Rule 304(a) finding. *Duggan*, 376 Ill. App. 3d 725. Justice O'Malley in a special concurrence reasoned that "[i]f, as the majority asserts, a postdecree petition is actually a continuation of the original dissolution proceedings, then there never is a post decree petition and *Purdy* 'would become wholly superfluous.'" *Duggan*, 376 Ill.App. 3d at 752 (O'Malley, J., specially concurring).

In 2008, the Illinois Supreme Court not only sidestepped the opportunity to provide direction to the diverging districts in *In re Marriage of Gutman*, 232 Ill. 2d 145 (2008), but also threw into doubt the appellate jurisdiction of a post-decree contempt petition which had been previously widely accepted to have appellate jurisdiction as a special, separate, proceeding pursuant to Supreme Court Rule 304(b)(5). In *Gutman*, the court held that the trial court's order terminating maintenance was not a final and appealable order because the wife had a petition for rule to show cause pending. 232 Ill. 2d 145. The court in *Gutman*, without overruling or distinguishing *Purdy*,

Carr, *Kozloff*, *Alyassir*, *Gaudio*, or *Duggan*, held that the wife's contempt petition was a part of her overall action to continue maintenance and was not a separate claim.

Only time will tell whether there will remain a divergence among the districts or whether the Illinois Supreme Court will, by rule or review, clarify whether a 304(a) finding is required to appeal post-decree proceedings. But, for now, the matrimonial law practitioner needs to be cognizant that the appellate jurisdiction over a post-decree order, absent a 304(a) finding, is entirely dependent upon which Appellate District the matter is brought. It would be too simplistic to say "secure one order disposing of all post-decree issues." However, barring that, there are essentially only two other options for appealing post-decree orders: get a 304(a) finding with the magic language that "there is not just reason to delay enforcement or appeal," or file a timely notice of appeal of each order and consolidate thereafter in the Appellate Court. ■

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Thursday, 7/7/11- Teleseminar—MD & DDS Practice Update, Part 1. Presented by the Illinois State Bar Association. 12-1.

Friday, 7/8/11- Teleseminar—MD & DDS Practice Update, Part 2. Presented by the Illinois State Bar Association. 12-1.

Tuesday, 7/12/11- Teleseminar—Employment and Labor Issues for Nonprofits. Presented by the Illinois State Bar Association. 12-1.

Thursday, 7/14/11- Teleseminar—Attorney Ethics in Advertising in a Digital Age. Presented by the Illinois State Bar Association. 12-1.

Tuesday, 7/19/11- Teleseminar—Estate Planning for Real Estate, Part 1. Presented by the Illinois State Bar Association. 12-1.

Friday, 7/20/11- Teleseminar—Estate Planning for Real Estate, Part 2. Presented by the Illinois State Bar Association. 12-1.

Wednesday, 7/20/11- Webinar—Conducting Legal Research on FastCase. Present-

ed by the Illinois State Bar Association. 12-1.

Thursday, 7/28/11- Teleseminar—Tax Planning Issues in Divorce. Presented by the Illinois State Bar Association. 12-1. ■

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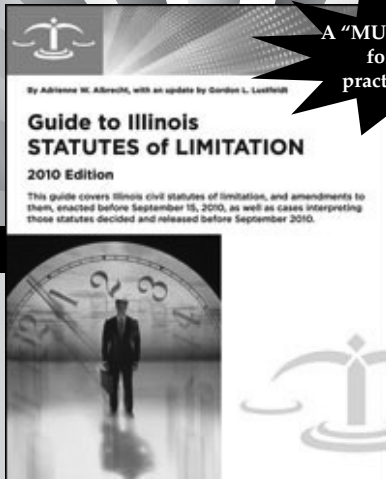
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