State of Ellinois : :88
County of Cook. :
People ex rel.Edwin P. Abbott :
vs.
Florence Kelley Wischnewetzky.

To the Honorable Judges of the Circuit Court of Cook County, State of Illinois:

Your petitioner, Edwin F. Abbott, of the County aforesaid, emplaining, shows that Hickolas Wischnevetzky, age six and one half years, Mangaret Wischnevetzky, age four roun and John Brown Wischnevetzky, age two years, are shallenen of Lazare Wischnevetzky and Florence Kelley Wischnevetzky, and are restrained of their liberty by the maid Florence Kelley Wischnevetzky, being temporarily in Cook County aforesaid.

Your petitioner further above that said lakere Wischnewetzky and Florence Kelley Wischnewetzky are husband and wife and have been married and living together for more than seven rears next prior to December 28, 1891; that for two years and more next prior to said 28th day of December, 1891, the said Lakare Wischnewetzky and Florence Kelley Wischnewetzky had been living with their said children at their home in the City of New York together as a family, the said father, Lakare Wischnewetzky, hering the actual custody of the said children; and the said parents were, and now are residents of the City, County and State of New York, and now are residents of

Your petitioner further shows that on the 28th day of December ,1891, the said Flore now Kelley Wisherswetzky, with-

out the knowledge or consent of the maid Lazare Wischnewetzky, took the maid named children from the home of the maid Lazare Wischnewetzky and Plorence Kelley Wischnewetzky in the city of new York and brought said children to the County of Cock aforemaid and has since then rotained the custody and control of said children, concealing them from the maid Lazare Wischnewetzky, and the maid Plorence Kelley Wischnewetzky has refused to meet the said Lazare Wischnewetzky or to have any consumication with the said Lazare Wischnewetzky where citier of the maid children is and refuses to permit the maid Lazare Wischnewetzky where citier of the maid children is and refuses to permit the maid Lazare Wischnewetzky to see or have any communication with, or custody of sither or any of the maid children.

Your petitioner further shows that the said lazare Wiscinesetzky, being entitled to the continued care and cuttody of his said delildren, came from the City of New York to 
Chicago in Jenuary, 1892, and again on the 21st of February 
1892, for the sole purpose of finding the said Florence Kelley Wischneetzky and the said children and regaining possession, custody and control of his said children; that on the 
occasion of each of said visits to Chicago he was obliged to 
return without seeing either the said Florence Kelley Wischneetzky, or being able to find or communicate with either 
of his said children.

Your retitioner further shows that the said Lazare Wiselnewetzky has indirectly communicated, through his collicitors and the solicitor of the said Florence Kelley Wiselnewetzky, with said Florence Kelley Wiselnewetzky, and has

through them learned that said Florence Kelley Wiselmewettsky refuses to meet the said Lazare Wiselmewetzky and refuses to communicate directly with said Lazare Wiselmewetzky and refuses to savise the said Lazare Wiselmewetzky where either of said children is, and refuses to per it the said Lazare Wiselmewetzky to see, or communicate with, os in any manner have any relations or communications of the said children.

Your petitioner further shows that said Florence Kelloy Wischnewstaky wrongfully detains each of the said children and that the same are retained in her control wrongfully, foreibly and without right or authority of law.

Your petitioner farther shows that the said Michoins Wischnewstaky, Manyaret Wischnewstaky and John Brown
Wischnewstaky are not, neither in either of them, ocemitted
or detained by virtue of any process, judgment, decree, or
execution issued by any court or Judge of to United States
in a case where such sourt or Judge has exclusive jurisdiction, nor by wirtue of a final judgment or decree of any
computent evart of civil or crominal jurisdiction, or of any
execution issued upon any such judgment or decree, nor for
any treason, falony, or other orine committed in any other
State or perritory of the United States for which they, or
either of them ought, by the constitution and laws or the
united States, to be delivered up to the executive power of
small States or perritory.

Your potitioner further shows that he is the attorney in low and in fact of said Lazare Wischnowetzky and had been by the said Lazare Wischnewetzky duly authorized and requested to institute proceedings in this behalf for the recovery by the said Lazare Wischnewetzky of the custody and possession of the said children, and your petitioner acts in this behalf for, and on behalf of the said children and the said Lazare Wischnewetzky.

Your petitioner therefore prays that a writ of Habeas corpus to be directed to the said Florence Kelley Wischnewetzky may issue in this behalf pursuant to the statue in such case made and provided, so hat the said Nicholas Wischnewetzky, Margaret Wischnewetzky, and John Brown Wischnewetzky may be forthwith brought by her before this Honorshle Court to do, submit to and receive what the lise may require.

Edwin F. Abbott.

Abbott & Baker Solicitors for Petitioner.

State of Allie air for Edmin F. abbett, the above on oath defour and vays that he have at the forgoing petition by him autoribed and knows the contents then of and that the mallers and things therein ally an him Ath but of his Knewless , is formation Edwin F. abbott. and bulis. Subscribes and sworts before me this 25.16 day of Pelmay ad. 1892 Henry But

Site and of Habers Copies view as above payed for orthogonally before me tomorrow the 26th tay of Suhmany 1892 at 12.30 P. M. Aals Telmany 25th 1892. Frank Baker,

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