

wise greatly injured your oratrix; and that afterwards on or about December 27th, 1891, at the same place the said Lazare Wischnewetzky again attacked your oratrix and struck, and spat upon, your oratrix in a violent manner and otherwise ill-treated her and said to her that he should continue to beat her and should teach their said son Nicholas to beat her; and at divers other times the said Lazare Wischnewetzky has struck and beaten your oratrix in a violent manner; and on each of said occasions, and on numerous other occasions, has used toward your oratrix in the presence of their said children the most obscene, profane, abusive and opprobrious language; that, so great and intolérable became the said cruelty and misconduct of the said Lazare Wischnewetzky towards your oratrix that she was compelled to, and did, leave the said Lazare Wischnewetzky and their said home on or about December 27th, 1891, taking with her their said children, and has ever since then remained away from the said Lazare Wischnewetzky and kept and retained the care and custody of their said children; that the maiden name of your oratrix prior to her said marriage with the said Lazare Wischnewetzky was Florence Kelley and your oratrix wishes to resume her said maiden name.

Forasmuch, therefore, as your oratrix is without remedy in the premises except in a court of equity; and to the end that the said Lazare Wischnewetzky, who is made party defendant to this bill of complaint, may be required to make full, direct and true answer to the same, but not under oath, the answer under oath being hereby expressly waived, that your oratrix may be divorced and forever freed from the bonds of matrimony now existing between your oratrix and the said Lazare Wischnewetzky; that the care, custody and education of the said children of your oratrix and the said Lazare Wischnewetzky may be awarded to your oratrix; that your oratrix may be per-

mitted by the decree of this honorable Court to resume her said maiden name, to wit: the name of Florence Kelley; and that your oratrix may have such other and further relief in the premises as equity may require and to your honors shall seem meet.

May it please your honors to grant the writ of summons in chancery, directed to the sheriff of the said county of Cook, commanding him that he summon the defendant to appear before the said court on the first day of the July, 1900, term thereof, to be held at the court house in Chicago, in the said county of Cook, then and there to answer this bill, etc.

Florence K. Wischniewsky

By Charles C. Arnold
Her Solicitor

Charles C. Arnold
 Solicitor for Complainant.

207710 12810

Conant Court
Cook County

Thomas K. Wickham
vs.

Jessie Wickham

Bill

FILED

JUN 7 1900

W. M. ...
P.O.

Charles Stewart
Attorney