


Domestic Relations Law for Volunteer Attorney Training


Illinois Marriage and Dissolution of Marriage Act, 750 ILCS 5/101, et seq.
 Illinois Parentage Act, 750 ILCS 46/101, et seq.
 Illinois Domestic Violence Act, 750 ILCS 60/101, et seq.

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Hotline Family Law 

- Divorce, Parentage, Domestic Violence
- Obtain complete information for all Domestic Relations cases
- What is client's goal?
- Give advice and send publication if appropriate
- Any referral to legal services provider (Including Domestic Relations Desk)?

CARPLS Domestic Relations Desk 

- Location: Circuit Court of Cook County Resource Center for People without Lawyers, Daley Center, CL16
- 8:30 am – 12:30 pm (Sign-in sheet starts at 8 am; no clients checked in after 12:00 pm)
- Brief legal consultation, review paperwork, provide advice; draft pleadings in limited simple, uncontested matters
- No Direct Representation.
- Small, overworked staff. Check with Attorney On Call before referral
- Worksheets?
- see referral screen for other requirements

Issues in Divorce & Parentage



- Divorce & Parentage
 - Allocation of parenting time and responsibilities
 - Child Support
- Divorce Only
 - Division of Property and debt
 - Maintenance

Jurisdiction and Venue



Subject Matter Jurisdiction

- Petitioner must live in Illinois 90 days before filing Petition for Dissolution of Marriage or before Judgment for Dissolution of Marriage is entered

Personal Jurisdiction

- Respondent lives in Illinois, was married in Illinois, lived here during the marriage
- If Respondent is living out of state, is there long arm jurisdiction?
- Required for court to order child support and divide property or debts

Venue

- County where either party resides. If pleadings are filed by the petitioner in county where neither party resides, the petitioner shall file with the initial pleadings a written motion advising that the forum selected is not proper venue and seeking a court order waiving the venue requirements pursuant to 750 ILCS 5/104.

Does Illinois Have Jurisdiction Over Child/ren of the relationship?



- Uniform Child Custody Jurisdiction and Enforcement Act (UCCJEA) 750 ILCS 36/101, et seq., determines whether Illinois has custody over children. Key factors in determining Home State jurisdiction include:
 - The state where the child has lived for the past 6 months
 - State entered prior order(s) for custody or parenting time.
- For example; parties have never been to court and there are no court orders in place regarding the children. Mom moves to Florida with children in 2010. Dad calls in 2012 and wants to file for parenting time in IL. Florida is the home state, has jurisdiction over the children and the case will need to be filed in FL.
- If case involves any issue regarding parenting time and responsibilities, need to establish that Illinois has jurisdiction – in both divorce and parentage cases.

Methods of Service



- Personal Service
 - Default – If Respondent is personally served and fails to file Appearance and Response to Petition for Dissolution of Marriage (or Response to Parentage Petition), the Petitioner can file a Motion for Default the Respondent. If the Respondent comes to court to contest, the judge will likely give him or her additional time to respond.
 - In case of personal service, attorney should also inquire if IL has personal jurisdiction over the Respondent. If there is not, the relief is limited to divorce.
- Publication: ONLY appropriate if the petitioner has conducted a diligent search first.
- Agreement –by filing Appearance

Grounds for Divorce



- Irreconcilable Differences is now the only ground for divorce in Illinois as of 1/1/2016 with the enactment of the new IMDMA.
 - If the parties live separate and apart for a continuous period of not less than 6 months immediately preceding the entry of the judgment dissolving the marriage, there is an irrebuttable presumption that the requirement of irreconcilable differences has been met. 750 ILCS 5/401 (a-5).

Joint and Simplified Divorce 750 ILCS 5/451, et. seq.



- Can be completed in one day if both parties appear in person and meet the following requirements:
 - Irreconcilable differences caused the breakdown of marriage;
 - The marriage must be less than 8 years;
 - The parties have no children of the relationship;
 - Neither party has an interest in real estate;
 - Neither party has an interest in retirement benefits. Parties may qualify if the retirement benefits are exclusively held in individual retirement accounts and the combined value of the accounts is less than \$10,000.
 - The parties have disclosed to each other all liabilities as well as all assets and tax returns from their years of marriage.
 - The total fair market value of all marital property is less than \$50,000
 - The combined gross annualized income from all sources is less than \$60,000 and neither party has a gross annualized income in excess of \$30,000.

Children?



- Allocation of Parenting Time and Responsibilities
 - Under the IMDMA of 1984, we called this custody and visitation. These legal terms are no longer in existence in Illinois.
- Child Support

Allocation of Parental Responsibilities/Parenting Time



750 ILCS 5/602.5 and 602.7.

- New statute replaces terms of **custody** and **visitation** with the **allocation of parental time and responsibilities**.
- In allocating parenting time and decision-making responsibilities and parenting time, the Court uses the standard of best interest of the child.
 - The Court considers many factors in determining what allocation of parenting time is in the best interest of the child including the wishes of the parents and the child, the parties ability to facilitate a relationship with the other parent, the child's primary residence, mental and physical health of the parents and children, and the history of domestic violence between the parties. See 750 ILCS 5/602.7.

Allocation of Parental Responsibilities



750 ILCS 5/602.5

- Decision making responsibilities have to be allocated by the parties or the court as to 4 main categories, **education, extracurricular activities, health, and religion**. See 750 ILCS 5/602.5.
 - For each category, parties or court designate whether one parent or both parents will make the decisions. A court is not required to allocate each parent decision making responsibilities.
 - The statute outlines a number of factors that the court must consider in determining what is in the best interest of the child. Significant factors include **mental and physical health of all individuals involved, level of each parent's past participation in significant decision making with regard to the child, prior agreement or course of conduct, distance between the parent's residences, the cost and difficulty of transportation and parties' schedule and the history of domestic violence between the parties.**

Parenting Time 750 ILCS 5/602.7



- **Legal Presumption:**
 - both parents are presumed to be fit.
 - Court shall not place any restrictions on parenting time unless it finds by preponderance of the evidence that a parent's exercise of parenting time would seriously endanger the child's physical, mental, moral or emotional health.
- Additional facts to consider:
 - amount of time that the parents spent performing caretaking functions with respect to the child in the 24 months preceding the filing of any Petition for allocation of parental responsibilities or, if the child is under 2 years, since the child's birth and the occurrence of abuse against the child or other member of the child's household. The history of the relationship of parent with child is important.
- Court shall not consider conduct of a parent that does not affect that parent's relationship to the child.

Parenting Plan 602.10



- **All parents, within 120 days after service or filing of petition for allocation of parental responsibilities must jointly or separately file with the court a proposed parenting plan.** The plan must allocate parenting time and responsibilities.
- If no plan is filed, the court must conduct an evidentiary hearing to allocate parental responsibilities.
- The Court shall order mediation to assist parents in devising a parenting plan.
- Parents may submit changes to the originally filed parenting plan until prior to the entry of the Judgment for Dissolution of Marriage.

Restriction of Parental Responsibilities 750 ILCS 5/603.10



- Parental time and responsibilities may only be restricted if:
 - "After a hearing, if the court finds by a **preponderance of the evidence** that a parent engaged in any conduct that **seriously endangered the child's mental, moral, or physical health**" or that **significantly impaired the child's emotional development**, the court shall enter orders as necessary to protect the child."
 - A parent who has established parentage under IL law and **who is not granted significant decision-making responsibilities** for a child is **entitled to reasonable parenting time** subject to provisions in Section 603.10 of this act, **unless** the court finds, after a hearing, that the **parenting time would seriously endanger the child's mental, moral or physical health or significantly impair the child's emotional development.**

Modification of Allocation Judgment 750 ILCS 5/610.5



- **Modification within less than 2 years since entry of the Allocation Judgment:**
 - Unless by agreement of the parties, no motion to modify an order allocating parental responsibilities may be made earlier than 2 years unless the court “permits it to be made on the basis of affidavits” that there is reason to believe the child’s present environment **seriously endangers his or her mental moral, or physical health or significantly impairs the child’s emotional development.**

Modification of Allocation Judgment 750 ILCS 5/610.5



- **Modification more than 2 years since entry of the Allocation Judgment:**
 - The court **shall modify** a parenting plan or allocation judgment if it finds by a preponderance of the evidence that there has been a substantial change in circumstances since entry of the judgment and that such modification is in the best interest of the child.
 - The court **may modify** a parenting plan without a showing of changed circumstances if modification is in the child’s best interests and **any** of the following are proven:
 - The modification reflects the actual arrangement between the parties in place for the past 6 months;
 - The modification reflects a minor modification;
 - The modification is necessary to “modify an agreed parenting plan or allocation judgment that the court would not have ordered or approved under Section 602.5 or 602.7 had the court been aware of the circumstances at the time of the order or approval; or,
 - The parties agree to the modification.

Parent’s Relocation 750 ILCS 609.2 and 750 ILCS 600(g)



- When does parent who has been allocated a majority of parenting time or who has been allocated equal parenting time need court permission to relocate with a child?
 - Relocation more than 25 miles away if living in Cook, Will, DuPage, Lake, McHenry or Kane Counties;
 - Relocation more than 50 miles away if living in any other county in Illinois;
 - Relocation outside the state and more than 25 miles away.

Parent's Relocation 750 ILCS 609.2 and 750 ILCS 600(g)



- The parent who has been allocated a majority of parenting time or who has been allocated equal parenting time must do the following to relocate with the child:
 1. File a written Notice of Relocation with the Clerk of the Circuit Court at least 60 days prior to the intended date of relocation and provide the intended date of relocation, the address of the new residence, and the duration of the relocation.
 2. If the non-relocating parent signs the notice, no further court action is required regarding relocation. However, the parenting plan will need to be modified to accommodate the changed residence.
 3. If the non-relocating parent does not sign the notice or contests the relocation, then the relocating parent must file a petition seeking court permission to relocate. The relocating parent must prove relocation is in the best interest of the child.

Visitation by Non-Parents 750 ILCS 5/602.9



- Visitation is now a term **only** used to refer to rights to spend time which children by certain non-parents.
- Who can seek visitation?
 - grandparents, great-grandparents, siblings, step-parents and in some instances, substitutes chosen by parents who are deployed in the armed forces who wish for visitation but are being denied visitation by the child's parent's.
 - This section does not apply to certain cases, such as parties who have a case in juvenile court or a pending adoption case.

Child Support: NEW Income Share Model, 750 ILCS 5/505



- In Illinois, both parents have a duty to support their child/ren.
- As of July 1, 2017, Illinois joined 39 other states and now calculates child support based on an "Income Shares" model.
 - For 30 years before July 1, 2017, Illinois based child support only on the income of non-custodial parent and calculated child support based on a percentage of the net income.
- The purposes of the new child support statute includes the following:
 - to calculate child support based upon the parents' combined net income estimated to have been allocated for the support of the child if the parents and child were living in an intact household;
 - to adjust child support based upon the needs of the child; and,
 - to allocate the amount of child support to be paid by each parent based upon a parent's net income and the child's physical care arrangements.
 - See 750 ILCS 5/505(a)(1)(D)-(F).

How Child Support is Calculated 750 ILCS 5/505



1. Determine each parent's net income;
 2. Add both parties' net incomes together to determine the combined net monthly income;
 3. Select the corresponding appropriate amount from the schedule of basic child support obligations based on the parties' combined monthly net income and number of children of the parties;
 4. Calculate each parent's percentage share of the basic child support obligation.
- Although a monetary obligation is computed for each parent as child support, the receiving parent's share is not payable to the other parent and is presumed to be spent directly on the child.
 - The parent with whom the child does not live is the parent who pays support.

Child Support 750 ILCS 5/505



- Parents cannot agree not to pay child support.
- The Court shall apply the child support guidelines "unless the court makes a finding that application of the guidelines would be inappropriate, after considering the best interests of the child and evidence which shows relevant factors including, but not limited to, one or more of the following:
 - (A) the financial resources and needs of the child;
 - (B) the financial resources and needs of the parents;
 - (C) the standard of living the child would have enjoyed had the marriage or civil union not been dissolved; and
 - (D) the physical and emotional condition of the child and his or her educational needs."
- See 750 ILCS (a)[2]
- The Court may also deviate from the guidelines pursuant to the factors contained in 750 ILCS 5/505(a)[3.4]

Child Support: Minimum Child Support 750 ILCS 5/505(a)(3.3a)



- What happens to our clients with no income?
 - There is a rebuttable presumption that a minimum child support obligation of \$40 per month, per child, will be entered for an obligor who has actual or imputed gross income at or less than 75% of the most recent United States Department of Health and Human Services Federal Poverty Guidelines for a family of one person, with a maximum total child support obligation for that obligor of \$120 per month to be divided equally among all of the obligor's children.

Child Support: Zero Dollar Child Support
750 ILCS 5/505(a)(3.3b)



- If the parent has no gross income and receives a means-tested form of public assistance, or cannot work due to medically proven disability, incarceration or institutionalization, the \$40/month minimum support order is inapplicable and a zero dollar order shall be entered.

Child Support: Shared Custody
750 ILCS 5/505(a)(3.8)



- The parties are presumed to have Shared Custody if each parent has 146 nights per year with the child or more.
- If the parties have Shared Custody, the calculation is computed as follows:
 1. Multiply the basic child support obligation by 1.5.
 2. Multiply each parent's portion of the support obligation by the percentage of time they spend with the child.
 3. Offset the respective obligations.
 4. The parent who owes more support pays the difference between the amounts.

Child Support: Split Custody
750 ILCS 5/505(a)(3.9)



- Split Care is when each parent has physical custody of at least one child.
- If Split Care is applicable, child support is calculated as follows:
 1. Compute the support the first parent would owe the other parent if the child was the only child of the parties;
 2. Compute the support the other parent would owe to the 1st parent as if the child in his or her care were the only child of the parties; then,
 3. Subtract the lesser support obligation from the greater.
 4. The parent who owes the greater obligation will be ordered to pay the difference in the obligations.

Child Support: Medical Expenses, Child Care Expenses, Extracurricular and School Expenses



- The new law also allows the Judge to order both parties to contribute to child care expenses, extracurricular and school expenses, health insurance, and unreimbursed health care expenses.
 - See 750 ILCS 5/505(a)(3.7), (a)(3.6), (a)(4) and (a)(4)(B).

Child Support 750 ILCS 5/505



- We do not expect you to calculate child support.
- If you are interested in calculating child support, I recommend you use the following online child support calculator available at <https://cscwebext.hfs.illinois.gov/CscWebEx/app/csc?execution=e1s1>

Child Support Modification 750 ILCS 5/510



- Legal basis to seek increase or decrease: Has there been a substantial change in circumstances since entry of the last order for support.
- Payor must return to court if he/she suffers income reduction and request child support modification.
 - Child support modification is prospective only.
- The enactment of the new law by itself is not a substantial change in circumstances.

Division of Property: Marital Property 750 ILCS 5/503



All property accumulated after the date of marriage and before entry of the Judgment for Dissolution of marriage by either spouse is presumed marital property. The presumption includes the following:

- All debt and "other obligations;"
- Non-marital property transferred into some form of co-ownership between the spouses.
- All pension plans and retirement accounts acquired or participated in by either party after marriage and before dissolution of marriage or legal separation is presumed to be marital property. (The new law codifies that post-marriage benefits are marital.)
- A spouse may overcome the presumption of marital property by a showing of clear and convincing evidence that the property is "non-marital property."

Non-Marital Property 750 ILCS 503(a)



- Acquired before marriage except as it relates to retirement plans which have "both marital and non-marital characteristics";
- Property acquired before marriage, even if acquired in contemplation of marriage "shall not be deemed marital"
- Acquired by gift or legacy;
- Acquired after judgment for legal separation;
- Excluded by valid pre or post nuptial agreement;
- The increase in the value of non-marital property.
- However, the increase in the value of non-marital property is subject to the right of reimbursement for the spouse who contributed to the increase in the value of the non-marital property.

Commingled Property 750 ILCS 503(c)(1)(A)



- Non-marital property can become or "transmute" to marital property if it is commingled:
 - If marital and non-marital property are commingled, and the contributing non-marital estate loses its identity, the property transmutes to the marital estate.

Contribution to Non-Marital Property and Reimbursement, 750 ILCS 503(c)(2)(A)



- Spouses may be entitled to reimbursement for a contribution to the increase in the value of non-marital property during the marriage in cases where it has not been commingled and transmuted to the marital estate.
- Both financial and "personal efforts" are recognized as contributions.
 - **However, the contribution of personal effort are reimbursable only if the efforts are significant and result in substantial appreciation to the non-marital property.**

Division of Marital Property 750 ILCS 503(d)



- The Court shall divide the marital property, without regard to marital misconduct, in just proportions considering all relevant factors (see Section 503(d) for all 12 factors) including duration the marriage, relative economic circumstances of each party, age and health of each party, and contributions each party has made to the marital estate.
- The court shall use a fair market value standard in valuing marital property.
- The date of valuation for the purpose of division of assets shall be the date of trial or such other date as agreed by the parties or ordered by the court, within its discretion.

Illinois Maintenance Law 750 ILCS 5/504



- The court may grant maintenance to either spouse in amounts and for periods as the court deems just, without regard to marital misconduct, and maintenance may be paid from income or property of the other spouse after consideration of all relevant factors including the duration of the marriage, the disparity in incomes and the history of one party supporting the other. For an inclusive list of all factors considered, see 750 ILCS 504(a).

Amount of Maintenance 750 ILCS 5/504(b-1)(1)(A)



If the court determines a maintenance award is appropriate, the court shall order maintenance in accordance with the following guidelines:

(A) Shall be calculated by taking 30% of the payor's gross income less 20% of the payee's gross income. BUT, this amount cannot exceed 40% of the combined gross income of the parties.

Formula:
$$\frac{30\% \text{ of payor's gross income} - 20\% \text{ of payee's gross income}}{\text{Amount of Maintenance}}$$
 BUT this amount cannot exceed 40% of the parties combined gross income.

Duration of Maintenance 750 ILCS 5/504(b-1)(1)(B)



The duration of the maintenance award shall be calculated by multiplying the length of the marriage **at the time the action was commenced** by one of the following:

- 5 years or less: .20
- More than 5 years but less than 10 years: .40
- More than 10 years but less than 15 years: .60
- More than 15 years but less than 20 years: .80
- More than 20 years: the court, in its discretion, shall order permanent maintenance or for a period equal to the marriage.

Practical Applications to Determining Maintenance



The new maintenance law has a 3 step approach:

1. Is maintenance appropriate? Apply factors pursuant to Section 504(a).
2. Calculate Amount of Maintenance if maintenance is appropriate.
3. Calculate Duration of Maintenance.
4. Maintenance is to be calculated before child support is calculated.

The new law requires the Court to support its decision to award or not to award maintenance, and to provide a basis for any deviation from the guidelines.

Domestic Violence 750 ILCS 60/101 et. seq.



- Ask every domestic relations client whether there is a history of domestic violence between the parties – See Handout "What is Domestic Violence"
 - Most recent incident?
 - Current Order of Protection in effect?
 - Have police been called? Any pending criminal charges for domestic battery?
 - Is client currently in danger?
 - Is client afraid of the other party?
- Where there is history of or there is current ongoing domestic violence, talk to the Attorney on Call (AOC).
- Domestic violence victim should NOT proceed pro se.
- There are several legal service providers who will take cases where this is current, ongoing domestic violence.
- Provide victims with social service referrals for immediate help from a 24/7 domestic violence hotline and for especially domestic violence counseling.

Illinois Parentage Act of 2015 750 ILCS 46/101, et seq. (effective 1/1/2016)



- Replaces IL Parentage Act of 1984 750 ILCS 45. Some parts of the old Act are incorporated but much of the 2015 Act is new or substantially new.
- It contains gender-neutral language and contains "Presumption of Parentage" rather than the previous Act's "Presumption of Paternity."

Establishment of Parent Child Relationship 750 ILCS 46/201



- (a) **Established between woman and child** by (1) giving birth, except as otherwise provided in valid gestational surrogacy contract; (2) adjudication of the woman's parentage; (3) adoption of the child by the woman; (4) a valid gestational surrogacy contract under the Gestational Surrogacy Act or other law; or (5) un rebutted presumption of woman's parentage under Section 204 of this Act (Presumption of Parentage).
- (b) **Established between a man and child** by (1) un rebutted presumption of man's parentage under Section 204; (2) an effective voluntary acknowledgement of paternity unless rescinded or successfully challenged; (3) adjudication of the man's parentage; (4) the man's adoption of the child; (5) a valid gestational surrogacy contract.

Presumption of Parentage
750 ILCS 46/204



A person is presumed to be the parent of a child if:

(1) The person and the mother of the child have entered into a marriage, civil union, or substantially similar legal relationship and the child is born to the mother during this relationship, except as provided by a valid gestational surrogacy contract or other law;

(2) The person and the mother of the child were in a marriage, civil union, or substantially similar legal relationship and the child is born to the mother within 300 days after the relationship is terminated by death, declaration of invalidity, judgment of dissolution of the relationship, or after a judgment of legal separation, except as provided by a valid gestational surrogacy contract or other law;

Presumption of Parentage (continued)
750 ILCS 46/204



• (3) before the birth of the child, the person and the mother of the child entered into a marriage, civil union, or substantially similar legal relationship in apparent compliance with law, even if the attempted marriage, civil union, or substantially similar legal relationship is or could be declared invalid, and the child is born during the invalid marriage, civil union, or substantially similar legal relationship or within 300 days after its termination by death, declaration of invalidity of marriage, judgment for dissolution of marriage, civil union, or substantially similar legal relationship, or after a judgment for legal separation, except as provided by a valid gestational surrogacy contract, or other law; or

• (4) After the child's birth, the person and the child's mother have entered into a marriage, civil union, or substantially similar legal relationship.

Illinois Parentage Act



• Note: A signed Voluntary Acknowledgement of Paternity (VAP) is now equivalent to a judicial adjudication of parentage, and is no longer only a conclusive presumption of paternity as it was under the old law. See 750 ILCS 46/305.

• A parent who has established parentage under IL law and who is not granted significant decision-making responsibilities for a child is entitled to reasonable parenting time subject to provisions in Section 603.10 of this act, unless the court finds, after a hearing, that the parenting time would seriously endanger the child's mental, moral or physical health or significantly impair the child's emotional development.

CARPLS Domestic Relations Desk



- Location: Circuit Court of Cook County Resource Center for People without Lawyers, Daley Center, CL16
- 8:30 am – 12:30 pm (Sign-in sheet starts at 8 am; no clients checked in after 12:00 pm)
- Brief legal consultation, review paperwork, provide advice; draft pleadings in limited simple, uncontested matters
- Do not represent in court
- Small, overworked staff. Check with AOC before referral
- Worksheets?

Domestic Relations Desk Referrals



- Referral to the Domestic Relations Desk is only appropriate if there is no marital real property and marital assets, including pensions or retirement savings accounts, are worth less than \$10,000.
- Clients need to provide us with documentation of the current value of his or her own pension or retirement account and/or that of the other spouse before we can determine whether the Domestic Relations Desk can assist.
- If the pension or retirement account is worth less than \$10,000, we need to advise client regarding her or his marital interest in it which is secured through a Qualified Domestic Relations Order (QDRO).
 - The Domestic Relations Desk does not draft QDROs.
- If the pension or retirement account is worth less than \$10,000, and client is willing to waive his or her interest in the other spouse's account, we would need that account specified in Divorce by Agreement Worksheet as being awarded to one party and the other party waiving the interest in it. (DR Desk uses an additional waiver of property.)
- The Domestic Relations Desk does not draft any divorce cases involving maintenance.

Practical Applications



The following questions should be asked EVERY client calling about a divorce so we can determine what is marital property and subject to "just" division:

- Real estate: Do you own any real estate? Does your spouse?
- If there is real estate, when was it purchased?
- What is the approximate fair market value and mortgage owed on the property?
- If property was purchased prior to the marriage, did parties live in the property together?
- Was it refinanced in both parties' names? If yes, then it was transmuted to Marital Property.
- Debt: ALL debt, regardless of the party in who's name the debt was incurred is presumed marital. Please ask about ALL debt incurred after the marriage.

Practical Applications



Retirement or pension plans:

- Ask each client if he or she has a retirement savings plan or pension and whether the spouse has one as well.
- Ask about the work history, especially in a long marriage even if client is currently unemployed or on some form of public assistance.
- Have you worked during the marriage? What kind of work did you do? Who did you work for and how long?
- The same questions should be asked about the spouse.
- These questions will often reveal a quite substantial retirement or pension plan.

Practical Applications



Maintenance:

Key information to obtain from all clients in a divorce case in order to determine whether maintenance is an issue:

- Length of marriage;
 - Disparity in incomes;
 - History of one party supporting the other including an current agreement whereby one spouse is supporting the other;
 - Parties' respective abilities to support themselves.
- Based on these factors, it is essential to obtain information about both parties' employment history and incomes for the history of the marriage. This is especially important in long marriages.
