

**LAW OFFICE OF  
DANIEL J. GRUENINGER**

DANIEL J. GRUENINGER  
ATTORNEY AT LAW

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424 SOUTH HIGH STREET  
BELLEVILLE, ILLINOIS 62220

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FAMILY LAW  
JUVENILE LAW

TELEPHONE (618) 257-2277  
FAX (618) 257-2335

**TEN COMMANDMENTS OF FAMILY LAW**

**1. Read and keep all correspondence.** To keep you informed of your case, I will periodically provide you with copies of the pleadings and letters from the court and opposing attorney. Because it often contains court hearing dates or key facts, you should always carefully read and keep letters from me in a folder for future use.

**2. What I need to know.** I need all the facts, not just the "good" facts that you want to tell me. I have heard numerous sordid details over the years ... there is nothing you can tell me that will offend me. If you are nervous, afraid, or embarrassed, tell me in writing. Err on the side of telling more rather than less, and tell me as soon as possible. However you decide to tell me, you are my eyes and ears. I am extremely experienced in handling family and juvenile law cases; let me decide what is critical to your case.

**3. Call me about questions or problems.** Explain any question or problem to me or my assistants, either of which will have an immediate solution or will return your call as soon as possible. When you call, leave a message about the problem, and not just "urgent" or "very important," either of which is futile and time consuming. Try to be clear and to the point. My assistant has paralegal training and is very skilled in handling routine questions that she has heard many times in the past. If I need to get involved, I will return your call as soon as possible, but I spend much time in court and cannot always call back right away.

**4. Keep a diary or log.** Keeping a record of events helps you recall dates and times for trial, and helps both you and I remember details more readily. Periodically, send me a copy of your record so that I may refer to it. Generally, any case in which you or your (ex)spouse are at odds over the facts, and in particular, cases involving custody, visitation violations, or past child support payments, should be reduced to a diary or log. If in doubt, write it down.

**5. Control your emotions.** Family law cases are extremely emotional and draining on all parties involved. Whether communicating with me, the judge, or your (ex)spouse, try to control your emotions and approach the issues with logic and common sense; it will help you understand the process much better, prevent you from getting frustrated, and make you a much better witness. If you allow your emotions to interfere with your good judgment or if you settle a case because you "just want to get it over with," you will, most assuredly, regret your actions later.

**6. Discovery.** With rare exception, everyone must complete a "Financial Statement," must gather up a number of materials, and must answer questions called "interrogatories." Each of these tasks must be completed in a timely manner; otherwise, you risk sanctions from the court, to include you paying attorney fees, or in the most egregious cases, having your pleadings stricken and not being able to present any evidence at trial. Do not argue with me, my assistants, the judge, or anyone about why you have to fill out a Financial Statement, why you have to provide copies of certain documents, or why you have to answer questions for discovery that you think are irrelevant. If I

believe you have a valid objection, I will raise it. The discovery is a critical part of the process, is required by law, and I will not represent a client that insists on "being his own judge" and fails to promptly comply with discovery. All your discovery will be re-typed, and expect that I will revise and distill your answers, often-times drastically, from your initial responses provided. Thus, do not worry about corrections made on the face of your responses. It is not necessary to call with questions while gathering the materials or answering the interrogatories. Do your best to gather up the items and answer the questions, and when my assistant or I review your responses, we will call you back with questions or sit down and go over the materials, on as 'as needed' basis. DO NOT write on documents to be used for trial (bank statements, pay stubs, etc.) And finally, when sending any materials, I need the original, unfaxed copies; never fax what can be sent through the mail or dropped off, unless it is an emergency and I tell you to fax the materials.

**7. Cooperation, Cooperation, Cooperation.** First and foremost, you must cooperate with me and the court. If you have children, you must attend the Children First program and must attend early. You will not be granted a divorce without attending and may be held in contempt of court if you do not do so within the time ordered. I will make many decisions on your behalf. I expect you to set the goals and to let me know what is important. No client ever receives everything they want. Everyone who goes through divorce experiences a drop in their standard of living, which is only logical when you now have two households to maintain where there was once just one. You will need to scale back your expenses or increase your income, or both, in order to make ends meet. Once the goals are set, I decide how to attain those goals; if it is your natural tendency to want to tell me how to run the case after you have set the goals, you will have to find another attorney.

**8. In Court.** When I meet you in court, flag me down and let me know you are there. Typically, the courtrooms are very busy, I see lots of different faces each week, and I may not recognize you, especially if I have other matters set that same day. I am concentrating on your case, not your face.

**9. Timing.** Many clients ask how long it will take to complete their case. This depends on many, many factors, not the least of which is your ability to cooperate in signing documents and providing me with discovery, what issues are raised by you and the other side, the judge's schedule, and how cooperative the other side is on the same issues. As you will notice, you have control over some part of how quickly your case proceeds, but not over a large portion of the delay in your case. Expect continuances; they are a normal part of the entire process. Most divorce cases take 9-15 months to complete, and most post-divorce cases take 6-12 months, as a general guide. Thus, for the same reasons that I do not promise results, I also do not, ever, promise completion within a specific time frame.

**10. What to expect.** If I were King and I made the laws, I could guarantee or promise results. I am not King and do not make the laws, and I can not (and do not) guarantee, or promise, any specific results. Each case is unique, with different facts and issues, and the judge is charged with the ability to use discretion in many of his decisions based on these differing facts. Thus, different, reasonable people can come to different conclusions about the issues. For this same reason, do not try to compare your case to your neighbor's case, your best friend's case, or your drinking buddy's case; no two cases are exactly alike and it is pointless to even discuss such a comparison. Know this ... I play to win, and I will do everything I can, within the law, to accomplish what you want. But, your goals must be reasonable and you must cooperate.