2026 IL App (1st) 260135-U
No. 1-26-0135
Order filed November 20, 2026

NOTICE: This order was filed under Illinois Supreme Court Rule 23(b) and is not precedential except in the limited circumstances allowed under Rule 23(e)(1).

IN THE

APPELLATE COURT OF ILLINOIS

FIRST DISTRICT, SIXTH DIVISION

IN RE MARRIAGE OF:

EVANTHIA C. GEORGAS, Petitioner-Appellee,

and

ANDREAS N. GEORGAS, Respondent-Appellant

Appeal from the Circuit Court of Cook County.
Honorable James S. Aguilu, Judge, Presiding.
No. 2021D003618

PRESIDING JUSTICE GAMRATH delivered the judgment of the court.
Justices Hyman and Evans concurred in the judgment.

ORDER

¶ 1 *Held*: The circuit court did not abuse its discretion in denying reconsideration of the guardian *ad litem* fee award, and we lack jurisdiction to review the denial of the motion to vacate modifications to the allocation judgment.

¶ 2 On January 26, 2026, Andreas Georgas filed a notice of appeal from a post-judgment order entered on January 12, 2026, in the dissolution proceedings between him and Evanthia Georgas. In the January 12 order, the trial court: (1) denied Andreas's motion to reconsider the award of guardian *ad litem* (GAL) fees to attorney Jean Conde; and (2) denied Andreas's motion to vacate certain modifications to the allocation judgment. The notice of appeal explicitly identifies only the GAL fee award and makes no mention of the allocation judgment. Nonetheless, Andreas attempts

to challenge both rulings in his opening brief. Neither Evanthia nor the GAL has filed an appearance or brief in this appeal.

¶ 3 We first address our jurisdiction over the denial of the motion to vacate certain modifications to the allocation judgment.

¶ 4 A notice of appeal confers jurisdiction on a reviewing court to consider only the judgments or parts of judgments specified in the notice. *General Motors Corp. v. Pappas*, 242 Ill. 2d 163, 175-176 (2011). The purpose of the notice is to inform the prevailing party that the opposing party seeks review. Where the deficiency is one of form, not substance, and the appellee is not prejudiced, the failure to comply strictly with the form of the notice is not fatal. *Id.* at 176.

¶ 5 The defect here is not merely formal. Andreas's notice of appeal specified only the GAL fee award and did not identify the denial of the motion to vacate, which concerns the distinct subject of the allocation judgment and is not fairly inferable, as a step in the procedural progression toward the fee award, from the ruling he did specify. See *People v. Smith*, 228 Ill. 2d 95, 105 (2008) (notice of appeal was deficient, in that it did not apprise the appellee of the nature of the appeal, where it "specifically mentioned a different judgment, and only that judgment"). Because the denial of the motion to vacate was neither specified in nor fairly inferable from the notice of appeal, we lack jurisdiction to review it. *General Motors*, 242 Ill. 2d at 176. Reviewing an unspecified ruling would also prejudice the absent appellee, who received no notice that it was in issue. *Id.* We therefore decline to consider Andreas's challenge to the denial of his motion to vacate certain modifications to the allocation judgment and dismiss that portion of the appeal.

¶ 6 We turn to the only issue properly before us: whether the circuit court erred in denying Andreas's motion to reconsider the GAL fee award of $6,903.20. Andreas contends the court abused its discretion by denying the motion without addressing his arguments on the

reasonableness of the fees, which he grounds in section 508(b) of the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/508(b) (West 2024)) and Illinois Supreme Court Rule 907 (eff. Mar. 8, 2016).

¶ 7 The allowance and amount of GAL fees rest within the sound discretion of the trial court and will not be disturbed on review absent a clear abuse of that discretion. *In re Marriage of Soraparu,* 147 Ill. App. 3d 857, 864 (1986). Andreas bears the burden of demonstrating such an abuse, and he cannot meet it on this record.

¶ 8 As Andreas acknowledges, an appellant has the burden of presenting a sufficiently complete record to support a claim of error. Absent such a record, we presume the trial court's order conformed with the law and had a sufficient factual basis, and any doubts arising from the incompleteness of the record are resolved against the appellant. *Foutch v. O'Bryant*, 99 Ill. 2d 389, 391-392 (1984). The record contains no transcript of the hearing on the motion to reconsider or of the proceedings on the fee petition. Aside from what is in the court orders, we have no account of the court's reasoning or of the evidence before it.

¶ 9 Where there is no transcript of the hearing, there is no basis for holding that the trial court abused its discretion. *Id.* The court's order states that it reviewed the GAL's billing and considered the parties' submissions, and we presume that it had a proper basis for its allocation and its denial of reconsideration. *Id.*; see *O'Malley v. Udo*, 2022 IL App (1st) 200007, ¶ 70 (affirming fee award where record lacked transcript of fee hearing).

¶ 10 Because the fee ruling was discretionary and Andreas failed to provide a record sufficient to support his claim of error, we affirm the denial of the motion to reconsider the GAL fee award.

¶ 11 Affirmed in part; dismissed in part.