

STATE OF WISCONSIN

CIRCUIT COURT  
BRANCH 12

DANE COUNTY

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Kris Brown

Plaintiff,

Case No. 2025 CV 6174

vs.

Harriett Green,

Defendant.

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PLAINTIFF'S NOTICE AND MOTION FOR SANCTIONS  
FOR FAILURE TO COMPLY WITH DISCOVERY ORDER

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TO: Attorney Frank Zambo

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Madison, WI  
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PLEASE TAKE NOTICE that pursuant to Wis. Stat. § 804.12(2) the Plaintiff moves the court for an order to enter a default judgement against the Defendant, pursuant to Wis. Stat. 804.12(2)(a)3 and for payment of reasonable expenses, including actual attorney fees, incurred in obtaining this order.

THIS MOTION WILL BE HEARD:

Before: Hon. Judge Anne Peacock

Place: Dane County Courthouse  
215 S. Hamilton St.  
Madison, WI 53703

Date: January 26th, 2025

Time: 9:00 A.M.

THE GROUNDS FOR THIS MOTION, as set forth in the supporting affidavit that accompanies this motion, are that Defendant failed to comply with an order to provide or permit discovery. Specifically, the Defendant failed to answer the Plaintiff's interrogatories not only by the 30-day deadline but also failed to respond when given an extension to do so.

Dated this 11<sup>th</sup> day of December 2025.

Schacherl Law Offices  
Attorneys for the Plaintiff

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Jack Graue

State Bar No. 2067982

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