

STATE OF WISCONSIN

CIRCUIT COURT  
BRANCH 12

DANE COUNTY

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Kris Brown,

Plaintiff,

Case No. 2025 CV 6174

vs.

Harriett Brown,

Defendant.

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KRIS BROWN'S NOTICE AND MOTION  
TO COMPEL DISCOVERY

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TO: Attorney Frank Zambo  
123 Main St.  
Suite 456  
Madison, WI  
53718

PLEASE TAKE NOTICE that pursuant to Wis. Stat. Section 804.12(1)(C)(1) the Plaintiff moves the court for an order compelling discovery and for payment of reasonable expenses, including actual attorney fees, incurred in obtaining this order).

THIS MOTION WILL BE HEARD:

Before: Honorable Judge Peacock

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

Date: Tuesday, December 2, 2025

Time: 9:00 A.M.

THE GROUND FOR THIS MOTION, as set forth in the supporting affidavit that accompanies this motion, is that Defendant failed to answer interrogatories from the Plaintiff as required by Wis. Stat. § 804.08.

Dated this 17<sup>th</sup> day of November, 2025.

Schacherl Law Offices  
Attorneys for the Plaintiff

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Jack Graue

State Bar No. 2067982

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