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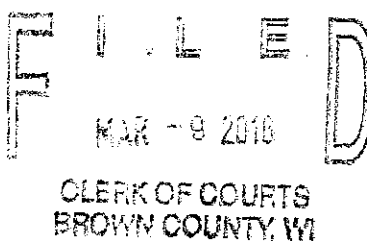
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March 9, 2016

VIA FAX
920-448-4133

The Honorable John P. Zakowski
Brown County Circuit Court, Branch 6
100 South Jefferson Street
P.O. Box 23600
Green Bay, WI 54305-3600



RE: *Marco Araujo, MD, et al. v. Green Box NA Green Bay, LLC*
Case No. 15-CV-769

Dear Judge Zakowski:

In regards to Mr. Van den Heuvel's objection to Clifton's proposed order filed yesterday, Clifton submits the following response:

- Mr. Van den Heuvel does not raise any objections concerning the language of Clifton's proposed order. Rather, it appears he is seeking to remove himself from liability of contempt by rearguing the Hearing on Clifton's Motion for Contempt (the "Hearing").
- Counsel for Green Box Green Bay, LLC was present for the Hearing. Mr. Van den Heuvel chose not to appear.
- At the hearing, the Court reviewed the documents attached to the Affidavit of Brittany S. Ogden filed in support of Clifton's Motion for Contempt. It was undisputed during the hearing that there are a number of agreements that contain Mr. Van den Heuvel's signature and that he signed them on behalf of and as an officer or "managing member" of Green Box Green Bay LLC. *See* Affidavit of Brittany S. Ogden in Support of Motion for Contempt dated January 21, 2016, in particular the signature lines of agreements and leases attached as Exhibits B, C, O, Dkt. # 13; *See also* Clifton Proof of Claim, Dkt. # 35.

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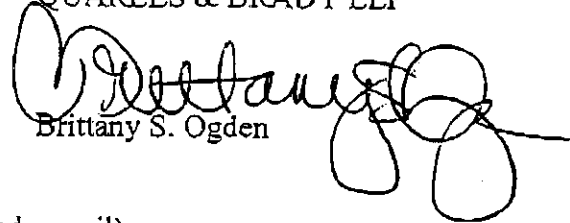
- Pursuant to the case law presented at the Hearing, including *State v. Baliestreri*, 55 Wis. 2d 51, 201 N.W.2d 18 (1972), the Court may find an Mr. Van den Heuvel, an undisputed officer and representative of Green Box Green Bay LLC in contempt of court.

Based on the arguments and reasons set forth at the Hearing, it is respectfully requested that the Court enter Clifton's Order.

Please note that a copy of this response to Mr. Van den Heuvel's objections to Clifton's proposed order was circulated simultaneous with this submission to all parties of record as referenced below.

Very truly yours,

QUARLES & BRADY LLP


Brittany S. Ogden

cc: Attorney John R. Petitjean (via U.S. Mail and e-mail)
Ronald H. Van Den Heuvel (via U.S. Mail and e-mail)
Attorney Carla O. Andres (via e-mail)
Attorney Jonathan T. Smies (via e-mail)
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