

Please wait...

If this message is not eventually replaced by the proper contents of the document, your PDF viewer may not be able to display this type of document.

You can upgrade to the latest version of Adobe Reader for Windows®, Mac, or Linux® by visiting http://www.adobe.com/go/reader_download.

For more assistance with Adobe Reader visit <http://www.adobe.com/go/acrreader>.

Windows is either a registered trademark or a trademark of Microsoft Corporation in the United States and/or other countries. Mac is a trademark of Apple Inc., registered in the United States and other countries. Linux is the registered trademark of Linus Torvalds in the U.S. and other countries.

**UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT
CHICAGO, ILLINOIS**

TISSUE TECHNOLOGY, LLC, et al.,]	Appeal from the United States District Court for
]	the Eastern District of Wisconsin
Plaintiffs-Appellants,]	
]	
No. 18-1835	v.	
]	
TAK INVESTMENTS, LLC, et al.]	No. 1:14-cv-01203-WCG
]	
Defendants-Appellees.]	William C. Griesbach,
]	Chief Judge

AMENDED JURISDICTIONAL STATEMENT

The District Court had jurisdiction as a civil action arising under the laws of the United States pursuant to 28 U.S.C. §1332. Jurisdiction is premised upon diversity of citizenship of the parties. The amount in controversy exceeds \$75,000.00.

Partners Concepts Development, Inc., is a Wisconsin corporation, a citizen of Wisconsin and has its principal place of business in the State of Wisconsin.

Oconto Falls Tissue, Inc is a Wisconsin corporation, a citizen of Wisconsin and has its principal place of business in the State of Wisconsin.

Tissue Products Technology Corp., is a Wisconsin corporation, a citizen of Wisconsin and has its principal place of business in the State of Wisconsin.

Tissue Technology LLC is a Wisconsin limited liability company and a citizen of the State of Wisconsin, with its principal place of business in Wisconsin and which, at the time of filing of this lawsuit, had as its members Ronald Van Den Heuvel, Kelly Van Den Heuvel, and Daniel Platowski who are all citizens of the State of Wisconsin. A fourth member was Paul

Damm, a citizen of the State of Illinois. During the pendency of this litigation, Daniel Platowski and Paul Damm forfeited their membership interests. The limited liability company was recently restructured. The current members of Tissue Technology are as follows:

1. Green Earth America LLC, a Wisconsin limited liability company a citizen of the State of Wisconsin with its primary place of business in the State of Wisconsin. The members of Green Earth America LLC are Bernard E. Dahlin, Bernard A. Dahlin and Brian Dahlin, all citizens of the State of Wisconsin.
2. True Sustainability Trustco LLP is a limited liability partnership and a citizen of the State of Wisconsin. Its principal place of business is in the State of Wisconsin. The partners of True Sustainability Trustco LLP, are:
 - a. KYHK, LLC, a citizen of the State of Wisconsin with its primary place of business in the State of Wisconsin. The members of KYHK, LLC are Ronald Van Den Heuvel, Kelly Van Den Heuvel, Henry Van Den Heuvel and Kate Van Den Heuvel all citizens of the State of Wisconsin.
 - b. RVDH Dvlpmnt LLC, a citizen of the State of Wisconsin with its primary place of business in the State of Wisconsin. The members of RVDH Dvlpmnt, LLC are Ronald Van Den Heuvel and Kelly Van Den Heuvel, who are both citizens of the State of Wisconsin.
 - c. The YK Irrevocable Trust Dated November 1, 2010, which is a citizen of the State of Wisconsin and has its principal place of business in the State of Wisconsin. The Trustee of this trust is Kelly Van Den Heuvel who is a citizen of the State of Wisconsin.

- d. The RVDH Family Irrevocable Trust Dated October 1, 2010, a citizen of the State of Wisconsin with its primary place of business in the State of Wisconsin. The Trustee of this Trust is Kelly Van Den Heuvel who is a citizen of the State of Wisconsin.
 - e. The Ron VDH Irrevocable Trust Dated September 18, 2003, a citizen of the State of Wisconsin with its primary place of business in the State of Wisconsin. The sole Trustee of this trust is Kelly Van Den Heuvel, a citizen of the State of Wisconsin.
- 3. KYHKJG LLC, a Wisconsin limited liability company and a citizen of the State of Wisconsin with its primary place of business in the state of Wisconsin and whose members are Ronald Van Den Heuvel, Kelly Van Den Heuvel, Henry Van Den Heuvel, Kate Van Den Heuvel and Ron Van Den Heuvel all citizens of the State of Wisconsin.
 - 4. HHKRK, LLC LLC, a Wisconsin limited liability company and a citizen of the State of Wisconsin with its primary place of business in Wisconsin and whose members are Kelly Van Den Heuvel, Henry Van Den Heuvel, Kate Van Den Heuvel, Hayden Van Den Heuvel and Ron Van Den Heuvel all citizens of the State of Wisconsin.

Defendant Tak Investments LLC is a Delaware limited liability company and a citizen of Delaware with its principal place of business in the State of Maryland. Defendant Sharad Tak is a Florida citizen, however, he has been dismissed from the lawsuit and this appeal does not

concern him—only Tak Investments LLC. The members of Tak Investments, LLC are Tak Investments, Inc., a Maryland corporation with its principal place of business in Maryland, and Mahinder Tak, a citizen of the State of Maryland.

This lawsuit involves four promissory notes with the principal amounts of \$4,000,000.00; \$3,000,000.00; 4,000,000.00; and \$5,000,000.00, along with interest which were issued following the sale of a paper mill located in Oconto Falls, Wisconsin. There is also an associated “Final Business Terms Agreement” that was executed contemporaneously. The amount in controversy exceeds \$75,000.00.

The Notice of Appeal was filed with the District Court on the 18th day of April, 2018 and this court has jurisdiction pursuant to 28 U.S.C. §1291.

Dated at Milwaukee, Wisconsin this 21st of August, 2018.

TERSCHAN, STEINLE, HODAN
& GANZER, LTD.
ATTORNEYS FOR PLAINTIFFS,

BY: /s/ MICHAEL J. GANZER

MICHAEL J. GANZER
STATE BAR NO. 1005631

P. O. ADDRESS:

309 NORTH WATER STREET
SUITE 215
MILWAUKEE, WI 53202
414-258-1010