

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

FORTUNE AVENUE, LLC,

Plaintiff,

Case No. 18-C-1362

v.

HOWARD BEDFORD,

Defendant.

**PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that the Plaintiff, Fortune Avenue, LLC, by its attorneys, Janssen Law LLC, will move the Honorable William C. Griesbach of the United States District Court, Eastern District of Wisconsin, for an Order consistent with the following Motion. The following motion will be heard at the Eastern District of Wisconsin courthouse located at 125 South Jefferson Street, Green Bay, Wisconsin 54301, at a date and time to be determined.

MOTION

NOW COMES the Plaintiff, Fortune Avenue, LLC, by its attorneys, Janssen Law LLC, and moves the Court for Summary Judgment pursuant to Fed. R. Civ. P. 56 on the grounds that there is no genuine issue as to any material fact and the plaintiff is entitled to judgment as a matter of law. The Plaintiff also moves the Court for costs and fees associated with this motion.

This motion is based upon the pleadings and documents on file in this matter together with: (1) Plaintiff's Memorandum of Law in Support of the Motion for Summary Judgment, (2) Affidavit of Robert J. Janssen in Support of Plaintiff's Motion for Summary Judgment, (3) Affidavit of Jim Kellam in Support of Plaintiff's Motion for Summary Judgment, (4) Affidavit of David Van Den

Heuvel in Support of Plaintiff's Motion for Summary Judgment, (5) the record as a whole, and (6) arguments to be offered at the hearing on this motion.

Dated: April 25, 2019

By: s/ Robert J. Janssen

Robert J. Janssen

State Bar No. 1000525

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