

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

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FORTUNE AVENUE, LLC,

Plaintiff,

Case No. 18-C-1362

v.

HOWARD BEDFORD,

Defendant.

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**PLAINTIFF'S MOTION FOR ATTORNEYS' FEES**

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Pursuant to Federal Rule of Civil Procedure 54(d)(2), Plaintiff, Fortune Avenue, LLC ("Fortune Avenue"), by and through its attorneys, Janssen Law LLC, hereby respectfully moves the Court for an award of attorneys' fees reasonably in the amount of \$22,015.00 incurred in the above-captioned matter.

The basis for Plaintiff's claim for reasonable attorneys' fees is that the contractual provisions of the October 21, 2011 Promissory Note signed by both parties, provides that the Defendant, Howard Bedford, is responsible for all costs of collection before and after Judgment, including reasonable attorneys' fees. See Complaint, Exhibit A - Promissory Note dated October 21, 2011, ¶7 ("Maker agrees to pay all costs of collection before and after Judgment, including reasonable attorneys' fees[.]")

The accompanying Affidavit of Robert J. Janssen for Attorneys' Fees contains a detailed statement of Plaintiff's reasonable attorneys' fees, totaling \$22,015.00. Based on the foregoing, Plaintiff respectfully requests the Court enter an Order for Attorneys' Fees against the Defendant, Howard Bedford, in the amount of \$22,015.00.

This motion is supported by the Affidavit of Robert J. Janssen and all papers and pleadings previously filed in this case. No brief will be submitted at this time; however, Plaintiff reserves the right to submit a Reply Brief in event there is an objection to the Motion for Attorneys' Fees.

Dated this 24th day of September, 2019

By: s/ Robert J. Janssen  
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**[PROPOSED] ORDER GRANTING PLAINTIFF'S  
MOTION FOR ATTORNEYS' FEES**

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Before the Court is the Plaintiff's Motion for Attorneys' Fees pursuant to Federal Rule of Civil Procedure 54(d)(2).

The Motion is GRANTED for the reasons stated therein, and the Court hereby awards the Plaintiff attorneys' fees in the total amount of \$22,015.00.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

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Honorable William C. Griesbach  
United States District Judge