

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 SUPPLEMENTAL MOTION FOR ATTORNEYS' FEES

Pursuant to the Decision and Order of District Judge William C. Griesbach dated February 6, 2020, Plaintiff, Fortune Avenue, LLC ("Fortune Avenue"), by and through its attorneys, Janssen Law LLC, hereby respectfully moves the Court for an supplemental award of attorneys' fees in the amount of \$1,590.00 incurred as a result of the motion to alter judgment filed by the Defendant, Howard Bedford.

The accompanying Supplemental Affidavit of Robert J. Janssen for Attorneys' Fees contains a detailed statement of Plaintiff's reasonable attorneys' fees of \$1,590.00 incurred as a result of the motion to alter judgment.

Plaintiff respectfully requests the Court enter an Amended Order for Attorneys' Fees against the Defendant, Howard Bedford, in the amount of \$23,805.00 (original Order for attorneys' fees of \$22,015.00 + \$1,590.00 for additional attorneys' fees = \$23,805.00).

This motion is supported by the Supplemental 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 Supplemental Motion for Attorneys' Fees.

Dated this 11th day of February, 2020.

By: s/ electronic signature Robert J. Janssen

Robert J. Janssen

State Bar No. 1000525

Janssen Law, LLC

3000 Riverside Drive, Suite 210

Green Bay, WI 54301

Phone: (920) 425-4844

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Email: bob@janssenlawfirm.com

Attorneys for Plaintiff, Fortune Avenue, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
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FORTUNE AVENUE, LLC,

Plaintiff,

Case No. 18-C-1362

v.

HOWARD BEDFORD,

Defendant.

**SUPPLEMENTAL AFFIDAVIT OF ROBERT J. JANSSEN IN
SUPPORT OF SUPPLEMENTAL MOTION FOR ATTORNEYS' FEES**

STATE OF WISCONSIN)
)SS
BROWN COUNTY)

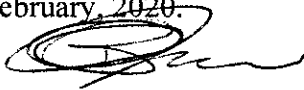
ROBERT J. JANSSEN, being sworn on oath, states as follows:

1. I am the attorney for the plaintiff, Fortune Avenue, LLC, in the above-entitled matter and I make this affidavit based upon personal knowledge and belief.

2. Attached hereto as *Exhibit "AA"* is a true and accurate copy of the Janssen Law LLC billing statement detailing the additional attorneys' fees of \$1,590.00 incurred as a result of the motion to alter judgment in the above-referenced matter.

3. This affidavit is being submitted in support of Plaintiff's Supplemental Motion for Attorneys' Fees pursuant to the February 6, 2020 Decision and Order from District Judge William C. Griesbach and Rule 54(d).

DATED this 11th day of February, 2020.



Robert J. Janssen

Subscribed and sworn to before me
this 11 day of February, 2020.

Kathryn VerBort
Notary Public, State of Wisconsin
My commission expires: is permanent.

Janssen Law LLC

3000 Riverside Drive, Suite 210
Green Bay, WI 54301
Phone: 920-425-4844

INVOICE

Invoice # 829
Date: 02/13/2020
Due Upon Receipt

VHC
3090 Holmgren Way
Green Bay, WI 54304

00405-VHC

Fortune Avenue v. Howard Bedford

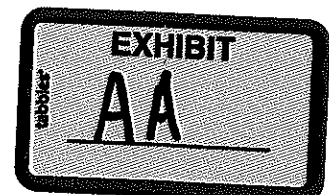
Type	Date	Notes	Quantity	Rate	Total
Service	10/15/2019	Review of Motion and Brief to Alter Judgment filed by Atty Smies. Review of Civil L.R. re: motion to amend and time for response.	0.50	\$300.00	\$150.00
Service	10/24/2019	Research and draft of response brief in opposition to motion to alter judgment.	2.00	\$300.00	\$600.00
Service	10/29/2019	Continued research, draft, and final revisions to response brief in opposition to motion to alter judgment.	1.80	\$300.00	\$540.00
Service	02/11/2020	Receipt and review of Decision and Order from Judge Griesbach. Drafted Notice and Supplemental Motion for Atty Fees and Supplemental Affidavit re: the same.	1.00	\$300.00	\$300.00
Service	02/11/2020	Draft of proposed Amended Order for Attorney Fees.	0.20	\$0.00	\$0.00
				Total	\$1,590.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
829	02/13/2020	\$1,590.00	\$0.00	\$1,590.00
Outstanding Balance				\$1,590.00
Total Amount Outstanding				\$1,590.00

Please make all amounts payable to: Janssen Law LLC



Payment is due upon receipt.