

FILED
04-30-2019
CIRCUIT COURT
DANE COUNTY, WI
2018CV003122

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

LEONARD POZNER,
Plaintiff,

vs.

Case No. 18CV3122

JAMES FETZER;
MIKE PALECEK;
WRONGS WITHOUT WREMEDIES, LLC;
Defendants.

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Plaintiff, by Plaintiff's undersigned counsel, will appear before the Dane County Circuit Court, the Honorable Frank Remington presiding, on June 17, 2019, or such other date and time to be determined by the Court, and move for an order for summary judgment.

Plaintiff moves this Court, pursuant to Wis. Stat. § 802.08(2), to find that Defendants have defamed Plaintiff and to grant Plaintiff's Motion for Summary Judgment. In support of this Motion, Plaintiff relies on the following:

1. Brief in Support;
2. Affidavit of Jacob Zimmerman with supporting exhibits;
3. Affidavit of Leonard Pozner with supporting exhibits;
4. Affidavit of Samuel Green with supporting exhibits;
5. Affidavit of Dr. Alan Friedman with supporting exhibits;
6. Plaintiff's Proposed Undisputed Facts; and

7. The pleadings on file.

Dated this 30th day of April, 2019.

QUARLES & BRADY LLP

Electronically signed by Marisa L. Berlinger

Emily M. Feinstein (WI SBN: 1037924)

emily.feinstein@quarles.com

Marisa L. Berlinger (WI SBN: 1104791)

marisa.berlinger@quarles.com

33 East Main Street

Suite 900

Madison, WI 53703-3095

(608) 251-5000 phone

(608) 251-9166 facsimile

Genevieve M. Zimmerman (WI #1100693)

MESHBESHER & SPENCE, LTD.

1616 Park Avenue

Minneapolis, MN 55404

Phone: (612) 339-9121

Fax: (612) 339-9188

gzimmerman@meshbesh.com

THE ZIMMERMAN FIRM, LLC

Jacob Zimmerman (*pro hac vice*)

1043 Grand Ave. #255

Saint Paul, MN 55105

jake@zimmerman-firm.com

Attorneys for Plaintiff Leonard Pozner