|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| STATE OF WISCONSIN | | CIRCUIT COURT | | [INSERT] COUNTY |
|  | | CIVIL DIVISION | |  |
| [INSERT FULL PLAINTIFF NAME] | | |  | MOTION FOR DEFAULT JUDGMENT |
|  | Plaintiff | |  | Case No. [CASE NO.] |
|  | | |  |  |
| Vs. | | |  | Case Code No. 30404 |
|  | | |  | Foreclosure of Mortgage |
| [INSERT ALL PARTY DEFENDANTS] | | |  |  |
|  | Defendants | |  |  |

NOW COMES PLAINTIFF, [INSERT PLAINTIFF NAME] (“Plaintiff”), by and through its Attorney, Charles A. Walgreen of MARINOSCI LAW GROUP, P.C. and moves this Honorable Court for the entry of default judgment pursuant to Wis. Stat. § 806.02 as follows:

1. On [INSERT FILING DATE], Plaintiff filed its Summons and Complaint to Foreclose Mortgage in this cause to foreclose the mortgage attached to the property commonly described as [INSERT PROPERTY ADDRESS].
2. Service of the Summons and Complaint to Foreclose Mortgage were completed over the parties as follows:

[DEFENDANT NAME] [SERVICE DATE] [TYPE]

True and correct copies of the Affidavits of Service have been filed herein.

1. As of [INSERT REVIEW DATE], [INSERT DEFAULTING PARTIES] have failed to file an Answer or other form of responsive pleading to Plaintiff’s Complaint to Foreclose Mortgage.
2. Under Wis. Stat. § 806.02(1), a default judgment may enter if no issues of fact or law have been joined and the time for joining said issues has expired.

WHEREFORE PLAINTIFF, [INSERT PLAINTIFF NAME] moves this Honorable Court for the entry of default judgment in favor of Plaintiff against [INSERT DEFAULTING DEFENDANTS] pursuant to Wis. Stat. § 806.02 and for any other relief this Honorable Court deems just and equitable in the premises.

Date: [INSERT DATE SIGNED]

Respectfully Submitted,

[PLAINTIFF NAME]

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

Charles A. Walgreen

Attorney for Plaintiff

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MARINOSCI LAW GROUP, P.C. is the creditor’s attorney and is attempting to collect a debt on its behalf. Any information obtained will be used for that purpose.