|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| STATE OF WISCONSIN | | CIRCUIT COURT | | [INSERT] COUNTY |
|  | | CIVIL DIVISION | |  |
| [INSERT FULL PLAINTIFF NAME] | | |  | MOTION TO AMEND PLEADINGS TO CORRECT [INSERT CORRECTION] |
|  | Plaintiff | |  | Case No. [CASE NO.] |
|  | | |  |  |
| Vs. | | |  | Case Code No. 30404 |
|  | | |  | Foreclosure of Mortgage |
| [INSERT DEFENDANT NAMES] | | |  |  |
|  | Defendants | |  |  |

NOW COMES Plaintiff, [INSERT FULL PLAINTIFF NAME] (“Plaintiff”), by and through its attorney, Charles A. Walgreen of MARINOSCI LAW GROUP, P.C., and in support of its Motion to Amend Pleadings to Correct [INSERT CORRECTIVE RELIEF] as follows:

1. The Complaint and Summons in this cause were filed on [INSERT DATE].
2. [INSERT FACTS SURROUNDING ERROR]
3. The pleadings in this cause should be amended pursuant to Wis. Stat. 802.09 to correct [INSERT CORRECTION].
4. No parties will be prejudiced by the entry of an order in conformance therewith.

WHEREFORE, Plaintiff, [PLAINTIFF NAME], hereby requests from this Honorable Court to grant its motion to amend the pleadings pursuant to Section 802.09 of the Wisconsin Rules of Civil Procedure and to correct the [CORECTION] in all filings for this foreclosure action, spreading the same of record.

Date: [INSERT DATE]

Respectfully Submitted,

[PLAINTIFF NAME]

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

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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.