STATE OF WISCONSIN CIRCUIT COURT [INSERT] COUNTY

CIVIL DIVISION

[INSERT CURRENT PLAINTIFF NAME]

Plaintiff

Case No. [INSERT]

VS. Case Code 30404

Foreclosure of Mortgage

[INSERT DEFENDANTS]

Defendants

**NOTICE OF FILING OF PLAINTIFF’S MOTION TO**

**SUBSTITUTE PARTY PLAINTIFF AND CERTIFICATE OF SERVICE**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

TO: Attached Service List

PLEASE TAKE NOTICE THAT on [DATE FILED], Plaintiff caused to be electronically filed in the Civil Division of the Circuit Court of [INSERT] County, Wisconsin, [INSERT COURTHOUSE ADDRESS], the attached Motion to Substitute Party Plaintiff, a copy of which is attached and is hereby served upon you.

The enclosed motion is being filed pursuant to the Five (5) Day Rule. Any party objecting to the motion must send a written objection within five (5) business days of receipt of the enclosed motion to the court and all other parties.  If no objections are received, Plaintiff will respectfully request that the motion be granted and the enclosed order be signed.

Respectfully Submitted,

[INSERT CURRENT PLAINTIFF]

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

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

1. Charles A. Walgreen, SBN 1087876
2. Attorney for Plaintiff
3. Marinosci Law Group, P.C.

134 North LaSalle Street, Suite 2400

Chicago, Illinois 60602

Tel: (312) 940-8580

Service by e-mail: mlgil@mlg-defaultlaw.com

**CERTIFICATE OF MAILING**

I, Charles A. Walgreen of Marinosci Law Group, P.C., attorney for Plaintiff, certify that on the [DATE MAILED], 2018, I caused to be mailed, properly enclosed in a postage paid envelope, a copy of the Notice of Filing of Plaintiff’s Motion to Substitute Party Plaintiff, Plaintiff’s Motion to Substitute Party Plaintiff and proposed Order Substituting Party Plaintiff to each of the following named persons, at his/her proper post office set forth after his/her respective name, to wit:

[INSERT ADDRESSES]

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

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

1. Charles A. Walgreen, SBN 1087876
2. Attorney for Plaintiff
3. Marinosci Law Group, P.C.

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STATE OF WISCONSIN CIRCUIT COURT [INSERT] COUNTY

CIVIL DIVISION

[INSERT CURRENT PLAINTIFF]

Plaintiff

Case No. [INSERT CASE]

VS. Case Code 30404

Foreclosure of Mortgage

[INSERT DEFENDANTS]

Defendants

\_\_\_\_\_\_\_

**MOTION TO SUBSTITUTE PARTY PLAINTIFF**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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 an Order Substituting Party Plaintiff as follows:

1. The above-captioned cause was filed on [COMPLAINT FILING DATE] by [CURRENT PLAINTIFF].
2. Subsequent thereto, all title, right and interest in the subject loan transferred and the real party in interest in this proceeding is now [NEW PLAINTIFF]. A true and correct copy of the Recorded Assignment(s) of Mortgage [IS/ARE] attached hereto as **Exhibit A.**
3. The party-plaintiff herein should be substituted to [NEW PLAINTIFF].

WHEREFORE, Plaintiff, [CURRENT PLAINTIFF] respectfully moves this Honorable Court to enter an Order Substituting the Party Plaintiff to [NEW PLAINTIFF] spreading the same of record and for any other such relief the court deems just and equitable in the premises.

Dated: [DATE SIGNED]

Respectfully Submitted,

[CURRENT PLAINTIFF]

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

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

1. Charles A. Walgreen, SBN 1087876
2. Attorney for Plaintiff
3. Marinosci Law Group, P.C.

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Chicago, Illinois 60602

Tel: (312) 940-8580

Service by e-mail: mlgil@mlg-defaultlaw.com

1. STATE OF WISCONSIN CIRCUIT COURT [INSERT] COUNTY
2. CIVIL DIVISION
3. [NEW PLAINTIFF]
4. Plaintiff
5. Case No. [CASE NUMBER]
6. VS. Case Code 30404
7. Foreclosure of Mortgage
8. [DEFENDANTS]
9. Defendants

**ORDER SUBSTITUTING PARTY PLAINTIFF**

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This cause having come before the Court on Motion of Plaintiff, [OLD PLAINTIFF] for the entry of an Order Substituting Party Plaintiff, the Court duly advised in the premises;

IT IS HEREBY ORDERED that [NEW PLAINTIFF] is hereby substituted as party-plaintiff herein.

DATED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_\_\_\_\_\_\_\_\_\_, 2018.

|  |
| --- |
| BY THE COURT: |
|  |
| By: |