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

PLEASE TAKE NOTICE that on [INSERT HEARING DATE] at [INSERT HEARING TIME], or as soon thereafter as counsel can be heard, the Plaintiff, by its attorney, Charles A. Walgreen, of MARINOSCI LAW GROUP, P.C. will apply to that Branch [INSERT NUMBER] of the Circuit Court of [INSERT] County, presided over by The Honorable [JUDGE FIRST AND LAST NAME], [INSERT COUNTY] County Courthouse, [INSERT COURTHOUSE ADDRESS], and there and then will move the court for the [SUMMARY/JUDGMENT ON THE PLEADINGS/DEFAULT/DISMISS UNKNOWNS] and for the entry of judgment of foreclosure.

Date: [INSERT DATE SIGNED]

Respectfully Submitted,

[PLAINTIFF NAME]

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

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

Charles A. Walgreen

Attorney for Plaintiff

MARINOSCI LAW GROUP, P.C.

134 North LaSalle Street, Suite 1900

Chicago, Illinois 60602

Tel: (312) 940-8580

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E-mail: mlgil@mlgdefaultlaw.com

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.

**CERTIFICATE OF MAILING**

I, Charles A. Walgreen, of MARINOSCI LAW GROUP, P.C., attorney for Plaintiff, certify that on the [INSERT DATE] day of [MONTH], 2018, I caused to be mailed, properly enclosed in a postage paid envelope, a copy of the Notice of Motion to [INSERT MOTION(S)], Motion to [INSERT MOTION(S)], Copies of Original Returns of Service, Affidavit of No Answer, Affidavit of Non-Military Service, the proposed Findings of Fact, Conclusions of Law and Judgment Order, the proposed Order [INSERT PROPOSED ORDER] to each of the following named persons, in care of his/her counsel, if applicable, at his/her proper post office address set after his/her respective name, to wit:

[INSERT ADDRESSES]

Respectfully Submitted,

[PLAINTIFF NAME]

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

Charles A. Walgreen, SBN 1087876

Attorney for Plaintiff

Charles A. Walgreen

Attorney for Plaintiff

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