

CrivelloCarlson&Mentkowski_{sc}

Attorneys at Law

VIA HAND DELIVERY

November 27, 2002

Clerk to the
Honorable Dominic S. Amato
Milwaukee County Courthouse
901 N. 9th Street, Room 104
Milwaukee, Wisconsin 53233

Re: Davidian v. Corder, et al.
Case No. 02-CV-9453

Dear Clerk:

Enclosed for filing please find the original and one copy of the following submitted on behalf of the defendants.

1. Notice of Motion and Motion to dismiss
2. Brief in Support of Motion to dismiss.
3. Affidavit of Steven Corder.
4. Affidavit of T. Michael O'Mara.
5. Affidavit of Jimmy Dale Shipley.
6. Affidavit of John C. Duffy. (Facsimile copy)

Please file the originals and return file-stamped copies to me in the enclosed postage-paid envelope.

By copy of this letter copies are being served upon the plaintiff.

Thank you for your attention to this matter.

Very truly yours,



RYAN G. BRAITHWAITE
RGB/gbb

Enclosures

Cc: Mr. Geoffrey K. Davidian (w/encs.)

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STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

GEOFFREY K. DAVIDIAN,

Plaintiff,

v.

STEVE CORDER,
T. MICHAEL O'MARA,
JIMMY DALE SHIPLEY and
JOHN C. DUFFY,

Defendants.

Case No. 02-CV-9453

Case Code: 30106

30301

30704

NOTICE OF MOTION AND MOTION TO DISMISS

TO: Geoffrey K. Davidian
4101 N. Prospect Avenue
Shorewood, Wisconsin 53211

PLEASE TAKE NOTICE THAT the defendants, STEVE CORDER, T. MICHAEL O'MARA, JIMMY DALE SHIPLEY and JOHN C. DUFFY, by their attorneys, CRIVELLO, CARLSON & MENTKOWSKI, S.C., will move the Court, the honorable Dominic S. Amato presiding, at the Milwaukee County Courthouse, 901 North 9th Street, Milwaukee, Wisconsin, 53233, on the 13th day of January, 2003, at 10:00 a.m., for an order dismissing the plaintiff's complaint in its entirety, with prejudice, for lack of personal jurisdiction over the defendants.

This motion is brought pursuant to §§ 801.05 and 801.08 of the Wisconsin Statutes, the Affidavit of Steven Corder, the Affidavit of T. Michael O'Mara, the Affidavit of Jimmy Dale Shipley, the Affidavit of John C. Duffy, and the enclosed brief. Through this motion the defendants seek the costs and disbursements of this motion and this action.

Dated this 27th day of November, 2002.

CRIVELLO, CARLSON &
MENTKOWSKI, S.C.
Attorneys for defendants

BY: 

RAYMOND J. POLLEN
State Bar No.: 1000036
RYAN G. BRAITHWAITE
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