

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

LEONARD POZNER,

Plaintiff,

vs.

Case No. 18CV3122

JAMES FETZER, Ph.D. et al.,

Defendant.

AFFIDAVIT OF RANDY J. PFLUM IN SUPPORT OF PLAINTIFF'S RESPONSE

Randy J. Pflum, being first duly sworn and under oath, states as follows:

1. I am one of the attorneys for the Plaintiff, Leonard Pozner ("Plaintiff"), in this matter. The information in this affidavit is based upon my personal knowledge, and if necessary, I could testify competently as to the facts contained herein.


2. On March 17, 2023, the Court held a hearing on whether the Defendant's UW Credit Union Account contained non-exempt funds.

3. During the March 17, 2023, hearing the Court ordered the Defendant's spouse, Janice Fetzer to provide Plaintiff with copies of the UW Account bank statements.

4. On or around March 20, 2023, Ms. Fetzer provided Plaintiff's counsel with 12 months of bank statements detailing the deposits in the UW Account together with an itemized list of non-exempt deposits. Attached hereto as Exhibit A is a true and correct copy of Ms. Fetzer's itemized breakdown of non-exempt deposits.


Randy J. Plum

Subscribed and sworn to before me
this 13th day of May, 2024


Notary Public, State of Wisconsin
My Commission expires: 12-29-2024

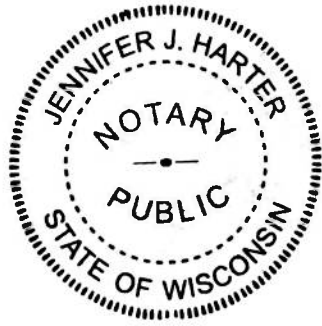


Exhibit A

20 March 2023

Attorney Randy J. Pflum
Quarles & Brady
33 East Main Street, Suite 900
Madison, WI

Re: Garnishment Hearing with Judge Remington (17 March 2023)

Dear Mr. Pflum,

In accordance with Judge Remington's instructions, here are the records of deposits for the Schwab UW Credit Union accounts. We created them in the beginning to keep Jim's retirement income from Schwab and Social Security separate and apart.

The only contributions he has made to the retirement account has been to reimburse me for expenses made using the UW Credit Card, because he does not have a credit or debit card for his Legal Defense Fund Account at State Bank of Cross Plains.

Let us know if you need anything more from us.



Janice E. Fetzer
800 Violet Lane
Oregon, WI 53575

Deposits to Retirement (Schwab) Account other than Schwab (for past 12 months)
plus Supporting Documents (attached)

Deposits to Retirement (Schwab) Account Other than from Schwab (during past 12 months):

3/21/22. From daughter for COSTCO	65.32
3/30/22 WI Tax Return	1,486.00
4/06/22 Federal Tax Return.	521.00
5/06/22 From daughter for COSTCO + Jim's lawsuit reimbursement	60.00 331.05
6/15/22 From daughter for COSTCO	159.00
8/08/22 From daughter for COSTCO.	153.88
9/02/22 Jim's FEDEX reimbursement	94.96
9/23/22 From daughter for 80 th birthday	100.00
12/01/22 Jim's FEDEX reimbursement.	1,000.00

NOTE: SUPPORTING DOCUMENTS ATTACHED HERETO including copies of Schwab Account for past 12 months.