

FILED
04-08-2019
CIRCUIT COURT
DANE COUNTY, WI
2018CV003122

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

LEONARD POZNER,
Plaintiff

vs.

Case No. 18CV3122

JAMES FETZER;
MIKE PALECEK;
WRONGS WITHOUT WREMEDIES, LLC;
Defendants.

MOTION TO DISMISS OR IN THE ALTERNATIVE TO STRIKE

PLEASE TAKE NOTICE that Plaintiff, by Plaintiff's undersigned counsel, will appear before the Dane County Circuit Court, the Honorable Frank Remington presiding, at a date and time to be determined by the Court, and move for dismissal of Defendant's counterclaims pursuant to Wis. Stat. § 802.06(2)(a)(6) or, in the alternative, to strike such counterclaims pursuant to Wis. Stat. 802.06(6).

BACKGROUND

Defendants defamed Leonard Pozner by falsely accusing him of circulating a fake death certificate. Mr. Pozner filed this lawsuit seeking damages for that defamation. Defendants have consistently tried to recast this narrow dispute into a case about whether the Sandy Hook tragedy occurred. The Court correctly stated, given the narrow scope of the allegations in the Complaint, that Defendants would not be allowed to make that unbounded conspiracy theory a part of this case. *See* Transcript of March 11, 2019, Doc. #51, at 49:17-50:23.

During the March 11, 2019 scheduling conference, Defendants announced their intention to bring counterclaims for abuse of process. *Id.* at 65:6-12. The Court granted leave to amend, with the caveat that those counterclaims must focus on the same transaction and occurrences and not add witnesses. *Id.* at 65:24-66:9.

Defendants refused to heed the Court's instructions. Instead of a narrow cause of action that would recompense Defendants in the event they could show that Noah Pozner did not die and his death certificate was forged by Leonard Pozner, they pled a wide-ranging conspiracy involving, among others, "federal, state and local municipal authorities". *See, e.g.,* Defendant Wrongs Without Wremedies Counterclaims, Doc. #55, at ¶ 5. Defendants crafted counterclaims that would greatly expand the scope of this case by requiring discovery into the underlying Sandy Hook tragedy, as opposed to the discovery required for Plaintiff's narrow defamation claims. To the extent the claims fail to adhere to the Court's instructions, Plaintiff moves to strike them.

The gist of Defendants' abuse of process counterclaims, which are in large part identical¹, is that Plaintiff is using this narrow defamation case to sustain an alleged ongoing and vast conspiracy to curtail Second Amendment rights. *See, e.g.,* Defendant Wrongs Without Wremedies Counterclaims, Doc. #55, at ¶ 13.

¹Although neither *pro se* defendant included language indicating that the pleading was prepared with the assistance of counsel, the overwhelming similarity of the language, identical in the relevant parts, indicates that the pleadings were drafted with the assistance of counsel for Wrongs Without Wremedies. Given that these counterclaims were clearly drafted with the assistance of counsel, or substantially copied from those that were, there is no reason to treat the *pro se* parties differently with respect to the abuse of process claims.

Dismissal is appropriate because Defendants' abuse of process counterclaims fail to allege facts that would be required to establish that the Defendants are entitled to the requested relief. They fail to allege any act by Plaintiff beyond the initiation of this case. Defendants failed to plead that the "primary" purpose for this defamation action was improper. They allege improper motives, but none of the alleged motives are sufficient to sustain a counterclaim for abuse of process. Moreover, Defendants fail to allege any "subsequent act," instead they recite only conjecture relating to some undefined effort by unspecified persons to eventually erode Second Amendment rights.

Separately, Defendant Fetzer alleges several flavors of fraud, none of which are pled with particularity. He also seeks declaratory judgment on an immaterial issue that would not change the legal status of the parties.

ARGUMENT

Abuse of process occurs when one "uses a legal process, whether criminal or civil, against another primarily to accomplish a purpose for which it is not designed...." *Wisconsin Pub. Serv. Corp. v. Andrews*, 766 N.W.2d 232, 237 (Wis. App. 2009). *Brownsell v. Klawitter* affirmed the Wisconsin Supreme Court's acceptance of the definition of this tort found in the Restatement (Second) of Torts § 682 (1977), which says "[t]he essence of this cause of action" is "the misuse of the court's power, 'usually to compel the victim to yield on some matter not involved in the suit.'" 306 N.W.2d 41, 44 (Wis. 1981)(internal citations omitted).

Abuse of process has two elements: (1) "a wilful act in the use of process not proper in the regular conduct of the proceedings" and (2) "a subsequent misuse of the

process.” *Brownsell*, 306 N.W.2d at 45. The Wisconsin Supreme Court long-ago characterized the inquiry as “whether the process has been used to accomplish some unlawful end, or to compel the defendant to do some collateral thing which he would not legally be compelled to do.” *Docter v. Riedel*, 71 N.W. 119, 120 (Wis. 1897), *quoted in Schmit v. Klumpyan*, 663 N.W.2d 331, 335 (Wis. App. 2003).

Because citizens are guaranteed access to the courts, and the tort of “abuse of process” has a potential chilling effect on the right of access to the courts, the tort is “disfavored and must be narrowly construed to insure the individual a fair opportunity to present his or her claim.” *Schmit*, 663 N.W.2d at 336. It is through the lens of this disfavored, narrow substantive law that this Court must evaluate the sufficiency of Defendants’ pleadings. *See Data Key Partners v. Permira Advisors LLC*, 849 N.W.2d 693, 701 (Wis. 2014). Defendants’ allegations fail as a matter of law on multiple fronts.

I. Defendants Failed to State a Claim for Abuse of Process

A. Defendants Fail to Allege a “Subsequent Misuse of the Process”

Defendants allege no overt acts by Plaintiff other than filing and serving the complaint with alleged knowledge that his son’s death certificate was fraudulent. *See* Defendant Wrongs Without Wremedies Counterclaims, Doc. #55, at ¶¶ 12-13; Defendant Fetzer’s Counterclaims, Doc. #53, at ¶¶ 15-16; Defendant Palecek’s Counterclaims, Doc. #52, at ¶¶ 12-13. That is insufficient as a matter of law to support an action for abuse of process.

Initiating a lawsuit, even with bad motives or intentions, does not give rise to abuse of process unless it “culminate[s] in an actual misuse of the process claim to obtain some ulterior advantage.” *Thompson v. Beecham*, 241 N.W.2d 163, 166 (Wis. 1976). A defendant can allege “culmination” in two ways: either a termination of the improperly initiated action in Defendants’ favor, *see Brownsell*, 306 N.W. 2d at 45, or some overt act that is unlawful or injures the Defendant, *see Docter*, 71 N.W. at 120. Defendants’ abuse of process claim fails as a matter of law because they did not allege any “culmination” or subsequent act by Plaintiff that has actually occurred.

Even if, as Defendants baselessly allege, Plaintiff wrongfully filed his Complaint knowing that his son’s death certificate was counterfeit, Defendants failed to allege any “subsequent misuse of the process.” *See Schmit*, 663 N.W.2d at 335. Defendants’ only other allegations relate to alleged motives or intentions or agendas, not acts. *See, e.g. Wrongs Without Wremedies Counterclaims*, Doc. #55 at ¶ 12-13. And even then, Defendants do not allege that the motives or intentions or agendas are attributable to Plaintiff, as opposed to other unnamed members of the alleged conspiracy involving “federal, state, and local” authorities. *Id.* at ¶¶5, 12-13. Because the current action has not terminated in Defendants’ favor with a finding that the death certificate was counterfeit and Defendants did not allege any subsequent wrongful act, their abuse of process counterclaims fail as a matter of law.

B. Defendants Fail to Allege a Sufficient “Improper Purpose”

Defendants allege that the defamation case was filed for an improper purpose. Each Defendant alleges that Plaintiff filed this action:

...for the improper purpose of sustaining the false belief by citizens of the State of Wisconsin and of the U.S. that a child massacre had been perpetrated by a mentally disturbed individual on December 14, 2012, who allegedly took possession of his mother's legally obtained firearm and then went on a killing spree at [Sandy Hook Elementary School].

See Palacek Counterclaim, Doc. #52, at ¶ 12, Fetzer Counterclaim, Doc. #53, at ¶ 15, Wrongs Without Remedies Counterclaim, Doc. #55, at ¶ 13. First, describing that alleged conduct as an “improper purpose” is a conclusion of law and not an allegation of fact. As such, it need not be accepted as true by the Court. See *Doe v. Archdiocese of Milwaukee*, 700 N.W.2d 180, 186 (Wis. 2005). Even if it were a fact, and was therefore assumed to be true for purposes of this Motion, the allegedly improper purpose cannot give rise to a claim for abuse of process as a matter of law. Defendants have pled no facts that plausibly demonstrate on their face either an unlawful purpose or a purpose to coerce or otherwise extort or pressure the Defendants, as is required under Wisconsin law. See *Schmit*, 663 N.W.2d at 335.

1. The Alleged Improper Purpose is Not “Unlawful”

First, Defendants have not pled any “unlawful” purpose. There is nothing unlawful about allowing the public to “sustain” a set of beliefs, even beliefs with which Defendants disagree. If abuse of process could arise for merely influencing public opinion, it would become part of every case involving any matter on which the public held an opinion. Moreover, such a broad interpretation of the cause of action would mean that it could just as easily be applied to Defendants' own pleadings, which are clearly intended to sustain the belief among Defendants' followers that the Sandy Hook events are a government cover up.

2. The Alleged Improper Purpose Does Not Injure Defendants

Second, absent from Defendants' counterclaims is any allegation that Plaintiff seeks to force *Defendants* to do some collateral thing that Plaintiff could not legally compel *Defendants* to do. Abuse of process can arise if the primary purpose of the lawsuit is to coerce the defendant to do something or refrain from doing something. *See Schmit*, 663 N.W.2d at 335; *see also Kaminske v Wisconsin Cent. Ltd.*, 102 F.Supp.2d 1066, 1078-1079 (E.D. Wis. 2000) (*quoting* William L. Prosser, Handbook of the Law of Torts § 121, at 856 (4th ed. 1971)). But Defendants pled no allegation that Plaintiff filed this case to coerce or extort or threaten the Defendants. Nor did Defendants recite any allegation that the alleged harm would or did cause injury to *them* (each of the Defendants), as opposed to some undefined third party (the citizenry).

Defendants did not, and cannot, plausibly allege that the act of filing this case was an effort to compel or pressure *Defendants* to do anything other than answer under the law for their defamations. Nor did they plead any unlawful purpose. As such, their claims for abuse of process fail as a matter of law.

C. Defendants Fail To Allege Plaintiff's Primary Purpose Of This Case Was To Achieve An Immediate Collateral Advantage

Defendants allege an improper collateral advantage because this case will sustain the public's belief that the Sandy Hook shooting actually occurred. *See, e.g.*, Wrongs Without Wremedies Counterclaim at ¶ 13. But Defendants pled no connection between the case as pled by Plaintiff and the supposed collateral advantage.

Plaintiff, as the Court previously noted, carefully tailored his Complaint to *avoid* delving into an investigation of the Sandy Hook shooting. *See* Transcript of March 11, 2019, Doc. #51, at 48:24-49:23; 55:1-14. Plaintiff can sustain the “falsity” element of his defamation claim merely by showing that Noah Pozner died on December 14, 2012 in Newtown, Connecticut and an authentic death certificate issued thereafter. No plausible nexus exists between the narrow process initiated by Plaintiff and the improper purpose alleged by Defendants. Thus Defendants have failed to provide any facts sufficient to establish that the alleged “willful act,” the filing and service of the complaint, was used to obtain the “subsequent misuse of the process,” the alleged sustained belief by the public of the Sandy Hook shooting to “advance an agenda to curtail or eliminate the rights of the citizenry....” *But cf. Brownsell*, 306 N.W.2d at 166 (requiring a subsequent misuse of the process where the initial process had not yet terminated).

Even if the public’s understanding of the Sandy Hook shooting could eventually be impacted by this case, that secondary, incidental impact does not support a claim for abuse of process. A collateral advantage must be “an immediate purpose,” Restatement (Second) of Torts § 682 cmt. b (1977). It is insufficient to allege some remote or downstream purpose that is not accomplished by virtue of the alleged wrongful act. *Id.*

Defendants have not alleged any immediate purpose. They do not allege that the alleged agenda to curtail the Second Amendment rights of U.S. citizens has been advanced by virtue of Plaintiff’s initiation of this litigation. They merely allege that

this case could somehow at some point result in the public “sustaining” a belief that Sandy Hook occurred and that such a belief would, at some speculative point in the distant future, support an “agenda” by some undefined persons or entities to attempt, by some unknown means, to curtail gun rights.

Moreover, Defendants have not alleged that the collateral advantage was Plaintiff’s “primary” purpose in filing this case. To successfully plead a claim for tortious abuse of process, the allegedly wrongful claim must “primarily” be intended to accomplish the improper purpose. *See Brownsell*, 306 N.W.2d at 44, *quoting* Restatement (Second) of Torts § 682; *see also* Wis. JI–Civil 2620 at 1 (1994). An incidental motive or benefit does not satisfy the “primary” purpose requirement. “[T]here is no action for abuse of process when the process is used for the purpose for which it is intended, but there is an incidental motive of spite or an ulterior purpose of benefit to [Plaintiff].” *Schmit*, 663 N.W.2d at 338–39, *quoting* Restatement (Second) of Torts § 682 cmt. b (1977). In other words, even if Plaintiff had an untoward motive in bringing this case—which he vehemently denies—so long as the hypothetically untoward motive is not the chief motivation for the complaint, the Defendants simply cannot satisfy the legal requirement showing the act of filing the complaint was tortious.

Nowhere in Defendants’ counterclaims do they allege that the “primary” purpose of this defamation case was to obtain the alleged collateral advantage, especially given the ill-defined nature of that advantage pled by Defendants. Defendants failed to allege any immediate purpose, but instead recite a future agenda

directed to the population at large. Without an improper purpose that satisfies the second *Brownsell* element, Defendants' abuse of process claim should be dismissed.

II. The Court Should Strike Defendants' Counterclaims

A. Defendants' Counterclaims Are Boundless in Scope

Given the Defendants' identical assertions that the conspiracy involves "federal, state, and local" authorities, a conspiracy which seems to grow with every piece of evidence undercutting their theory, Defendants' counterclaims are essentially boundless. Given Defendants' allegations of improper purpose and collateral advantage, both of which involve unspecified third parties' beliefs and agendas, the new claims would require extensive discovery into matters that are far beyond the scope of Plaintiff's complaint. Rather than merely determining whether Noah Pozner lived, died, and whether his death certificate was duly issued as required by Connecticut law, Defendants' counterclaim would presumably require discovery into whether Sandy Hook was a governmental operation to "advance an agenda" of curtailing gun rights.

The Court granted Defendants' request to assert a counterclaim, but only on the condition that the counterclaim be "within the same kind of transaction and occurrence as set forth in the Complaint, adding no witnesses, really sticking close to the central issue of whether the death certificate is a falsity or a fraud...." Transcript of March 11, 2019, at 64:24-65:9. Defendants' failure to follow the Court's instructions is sufficient reason to strike their counterclaims.

B. Defendants' Requested Declaratory Relief Fails to Present a Controversy

Defendants Wrongs Without Wremedies and Palecek seek “declaratory” determination that Plaintiff “altered, changed and contrived” the death certificate at issue in this case. *See, e.g.*, Wrongs Without Wremedies Counterclaims, Doc. #55, at Prayer For Relief (A). At least with respect to the terms “altered” or “changed,” the requested relief does not resolve any controversies between the parties and is therefore not suitable for declaratory relief.

Wisconsin’s Declaratory Judgment act states that a “Court may refuse to render or enter a declaratory judgment or decree where such judgment or decree, if rendered or entered, would not terminate the uncertainty or controversy giving rise to the proceeding.” Wis. Stat. 806.04(6). Defendants’ requested relief is not appropriate because there is no dispute.

Plaintiff’s defamation claim and Defendants’ defense turns on whether the death certificate is counterfeit, not whether it was “altered” or “changed.” The words “altered” and “changed” merely mean the death certificate was not precisely the same as when it was issued by the State of Connecticut.² There is no dispute that Leonard Pozner “altered” or “changed” the relevant copy of Noah Pozner’s death certificate by redacting his son’s Social Security Number³ from the “administrative purposes”

² It is unclear in this context what Defendants mean by “contrived.” If the intended meaning is the same as “altered” or “changed,” then it should be stricken for the reasons stated herein. If Defendants intended “contrived” to have its ordinary meaning, *i.e.*, “deliberately created,” or “manufactured” by Mr. Pozner, then Plaintiff would not move to strike that narrowed recitation for relief under these grounds.

³ The State of Connecticut redacts social security numbers from all certified death certificates except for those provided to limited categories of recipients, for

section of his son's death certificate, and redacting the disposition and location of his son's final resting place from Boxes 29 and 30 of the death certificate. Those redactions, which unmistakably appear in black marker in the copy released by Plaintiff, and which was later depicted in Defendants' book, are not germane to this dispute.

Defendants' defamation defense relies on the alleged truth of the underlying statement, *i.e.*, that the death certificate is counterfeit. *See, e.g.*, *Wrongs Without Wremedies Answer*, Doc. #36, at ¶ 51. Likewise, Defendants' counterclaims were premised on the claim that the death certificate itself is not genuine. *See Transcript of March 11, 2019*, at 65:6-65:12.

In addition, Defendants' book does not say that the death certificate is fake because a few boxes were redacted. It states the document was a fake because of "a dozen or more grounds" including "inconsistent tones, fonts and clear digital manipulation." *See Zimmerman Affidavit at Ex. B (excerpt from "Nobody Died At Sandy Hook" "Expanded 2016 Revised" edition)*.⁴

example, parents of the decedent. *See Conn. Gen. Stat. § 7-51a(c)*, *see also Zimmerman Aff. at Ex. A (Connecticut death certificate request form explaining that a death certificate containing the decedent's social security number is provided only to certain authorized recipients)*.

⁴ Each of the Defendants has admitted that this language, which was reproduced in paragraph 17 of Plaintiff's Complaint (Doc. #1), appeared in their book. *See Defendant Fetzer's Response to Plaintiff's Motion to Strike*, Doc. #27, at p. 12 (affirming para. 17 of Plaintiff's Complaint); *see Defendant Palacek's Answer*, Doc. #28, at 1 (affirming para. 17 of Plaintiff's Complaint); *see Defendant Wrongs Without Wremedies Answer*, Doc. #36, at ¶ 17 (admitting the allegations in para. 17 of Plaintiff's Complaint).

Defendant Fetzer's blog post, which forms the grounds for Plaintiff's second defamation count, says that the death certificate "turned out to be a fabrication, with the bottom half of a real death certificate and the top half of a fake, with no file number and the wrong estimated time of death at 11 AM, when 'officially' the shooting took place between 9:35-9:40 that morning." *See Zimmerman Affidavit at Ex. C; see also Plaintiff's Complaint, Doc. #1, at ¶ 18* (asserting defamation based on Defendant Fetzer's blog post); *see also Defendant Fetzer's Response to Plaintiff's Motion to Strike, Doc. #27, at p. 12* (affirming paragraph 18 of Plaintiff's Complaint). Nowhere have Defendants ever suggested that their defamatory statements were based on the existence of those redactions.

A declaration that the death certificate was "altered" or "changed" by Plaintiff "would not terminate the . . . controversy giving rise to the proceeding." *See Wis. Stat. § 806.04(6)*. The Court should decline to allow Defendants to assert a claim for declaratory relief of that scope because such relief would not change the legal status of the parties in any way.

III. Defendant Fetzer's Other Counterclaims

In addition to the claim described above, Defendant Fetzer asserted two additional counterclaims and seeks additional declaratory relief. The two fraud claims should either be stricken for failing to comply with the Court's instructions, or, alternatively, the Court should grant Plaintiff's motion to dismiss for failing to plead any of those fraud claims with particularity. The declaratory relief should be stricken because it is irrelevant in that it does not reflect the issues in dispute and therefore does not impact the parties' legal positions.

A. Defendant Fetzer's Fraud Claims Should be Dismissed

Defendant Fetzer has failed to plead fraud with particularity as required by Wis. Stat. § 802.03(2). Wisconsin requires allegations of fraud to specify “the “who, what, when, where and how.” See *Friends of Kenwood v. Green*, 619 N.W.2d 271, 276 (Wis. App. 2000). Despite the clear legal requirements necessary to loft allegations of fraud, Defendant Fetzer's allegations fail to include any detail specifying the basis for his fraud counterclaims. See Fetzer's Counterclaims, Doc. #53, at ¶ 17 (“Fraud and Theft by Deception.”), ¶¶ 18-20 (Fraud Upon The Court).

Defendant Fetzer's Second Counterclaim alleges “fraud upon this court and the public” by Plaintiff for “presenting himself” as the father of a murdered son. *Id.* at ¶ 17. Defendant Fetzer's allegation fails to meet the pleading requirements for fraud and should therefore be dismissed.

Defendant Fetzer's second counterclaim also references “theft by deception”. *Id.* Wis. Stat. § 895.446(1) allows a civil action for theft by deception by “[a]ny person who suffers damage or loss....” Defendant Fetzer alleges loss by “sympathetic but gullible Americans,” but has not alleged that *he* suffered damage or loss due to the alleged deception. See Defendant Fetzer's Counterclaim, Doc. #53, at ¶ 17. Because Defendant Fetzer failed to plead damage or loss and also failed to plead fraud with particularity, his second counterclaim claim should be dismissed.

Defendant Fetzer's third counterclaim is styled as “Fraud Upon The Court.” See Defendant Fetzer's Counterclaim, Doc. #53, at ¶ 18-20. Defendant Fetzer alleges that he has not been able to locate Leonard Pozner using search engines, and

therefore it “appears” that Leonard Pozner a “fiction.” *Id.* He therefore “concludes” that Mr. Pozner has filed this case under a false name. *Id.*

Defendant Fetzter also reiterates his “belief” that Noah Pozner was not a real person. *Id.* While Defendant Fetzter sets forth his beliefs and conclusions, he does not allege any act of fraud, much less describe any actual or constructive fraud with specificity as is required under Wisconsin law.⁵ Nor does Defendant Fetzter allege any judgment or order of the Court from which he seeks equitable relief as a result of the alleged fraud. As such, Defendant Fetzter’s Third Counterclaim should be dismissed.

B. Defendant Fetzter’s Declaratory Relief Should be Stricken

Defendant Fetzter seeks declaratory relief that the death certificate released by Leonard Pozner in 2015 is not the same as the one attached to Plaintiff’s Complaint and therefore there can be no liability for defamation. *See* Defendant Fetzter’s Counterclaim, Doc. #53, at Prayer for Relief Para. (A). That requested declaratory relief does not relate to any of the claims or defenses in this case.

First, as described above, it is undisputed that the two documents are not the “same.” That does not mean they are not both certified copies of Noah Pozner’s death certificate, duly issued by the State of Connecticut. As made clear on the face of the

⁵ Defendant Fetzter also alleges that Noah Pozner’s passport is counterfeit. This wholly unfounded allegation has nothing to do with this case. But to allay his concerns, Plaintiff cordially invites Mr. Fetzter to refer the issue to the appropriate authorities—for example—the United States Department of State, Bureau of Consular Affairs, so that agency may conduct a full investigation of the alleged criminal activity. *See* <https://travel.state.gov/content/travel/en/contact-us/reporting-fraud.html>.

form requesting death certificate in the State of Connecticut, some information is released only to the parents or other authorized representatives of the decedent. *See* Conn. Gen. Stat. § 7-51a(c); *see also* Zimmerman Aff. at Ex. A. That Noah Pozner’s father would be provided a certified copy of his death certificate that included additional information not generally released to other requesting parties does nothing to undermine the legitimacy of either certificate. Put simply, a declaratory judgment that the documents are not the “same” has no impact on the parties’ legal positions in this controversy (or any controversy).

Second, a declaration that “Defendant cannot be guilty of defamation for a document they have in fact never addressed” is irrelevant to the claims in dispute. Plaintiff’s defamation claims are not premised on the copy of the death certificate attached to Plaintiff’s Complaint, they are premised on the statements Defendants admit to making in their book and in Defendant Fetzer’s blog post. *See* Plaintiff’s Complaint at ¶¶23, 32; *see also* fn. 4, *above* (documenting Defendants’ admissions). The requested relief is entirely irrelevant to the parties’ legal positions. Thus, the requested relief would have no impact on the controversy being litigated and the Court should decline to allow it.

CONCLUSION

Defendants’ counterclaims fail to set forth allegations sufficient to sustain claims for abuse of process or fraud. Defendants—each of them—reach far beyond the Court’s instructions regarding the permissible scope of any counterclaims. As such, they should be dismissed.

Respectfully submitted.

Dated: April 8, 2019

/s/ Genevieve M. Zimmerman

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