FIRST BANKING CENTER,

Plaintiff.

-VS-

WINDMILL COMMUNITIES LLC, et al.

Defendants.



NOTICE OF MOTION AND MOTION TO ADMIT ROBERT T. HANLON, ESQ., AS CO-COUNSEL PRO HAC VICE

To: First Banking Center

c/o Attorney Cynthia G. Fletcher

Davis & Kuelthau, S.C.

111 E. Kilbourn Avenue, Suite 1400

Milwaukee, WI 53202

Farris Hansen & Assoc., Inc. 7 Ridgway Court Elkhorn, WI 53121

PLEASE TAKE NOTICE that Defendants, Windmill Communities LLC and Michael R. Reschke, by the undersigned counsel, respectfully request from the Court an Order permitting Attorney Robert T. Hanlon, a non-resident attorney with The Law Offices of Robert T. Hanlon & Associates, P.C., 14212 Washington Street, #200, Woodstock, IL 60098, to appear and participate in this action as counsel for Defendants Windmill Communities LLC and Michael R. Reschke, based on the grounds set forth in the accompanying Affidavit of Steven A. Koch.

Dated this 3/80 day of August, 2011.

SEYMOUR, KREMER, KOCH & LOCHOWICZ LLP

By:

Steven A. Koch

State Bar No.: 01000281

Attorney for Defendants Windmill Communities LLC

and Michael R. Reschke

23 N. Wisconsin Street P.O. Box 470 Elkhorn, WI 53121-0470 (262)723-5003

FIRST BANKING CENTER,

Plaintiff,

-VS-

WINDMILL COMMUNITIES LLC, et al.

Defendants.

CASE NO.: 11-CV-680

AFFIDAVIT OF STEVEN A. KOCH IN SUPPORT OF MOTION TO ADMIT PRO HAC VICE

STATE OF WISCONSIN)
) ss
WALWORTH COUNTY)

Steven A. Koch, being duly sworn on oath, deposes and states as follows:

- 1. I am an attorney licensed to practice law in the State of Wisconsin and am a partner in the law firm of Seymour, Kremer, Koch & Lochowicz LLP. This Affidavit is submitted in support of the motion to admit Robert T. Hanlon *pro hac vice*.
- 2. Attorney Robert T. Hanlon is counsel retained by the Defendants Windmill Communities LLC and Michael R. Reschke with respect to the above-referenced matter.
- 3. The undersigned has been retained to appear as local counsel on behalf of the Defendants Windmill Communities LLC and Michael R. Reschke in association with Attorney Hanlon.
- 4. In support of this motion, the undersigned has attached and incorporates by this reference the Applications for Pro Hac Vice of Attorney Robert T. Hanlon which were filed with the Officer of Lawyer Regulation.

WHEREFORE, this Affidavit is made in support of the motion to have Attorney Robert T. Hanlon admitted pro hac vice as counsel for the Defendants Windmill Communities LLC and Michael R. Reschke in the above-referenced matter.

Dated this 3 day of August, 2011

Steven A. Koch

SUBSCRIBED AND SWORN before

me this 31st day of August, 2011.

Notary Public Walworth County WI My commission expires 10-33-11



COUNTY STATE OF WISCONSIN, CIRCUIT COURT, WALWORTH Application for Case Caption: Pro Hac Vice ADMISSION FIRST BANKING CENTER 11-CV-680 Case No. WINDMILL COMMUNITIES LLC et al. I DECLARE UNDER PENALTY OF PERJURY: That I seek to appear pro hac vice in order to represent <u>Windmill Communities LLC</u> in the above-captioned matter; That I am admitted to practice law in the highest court(s) of the state(s) or country(ies) of IL; 2. That there are no disciplinary complaints filed against me for violation of the rules of those courts 3. (if so, please explain): _____ That I am not suspended or disbarred from practice for disciplinary reasons or reason of medical incapacity in any jurisdiction (if yes, please explain): That I am associated with Attorney Steven A. Koch , State Bar No. 01000281 an active member of the State Bar of Wisconsin (name the member of the State Bar of Wisconsin and provide his/her Member Number); That I do not practice or hold out to practice law in the State of Wisconsin; That I acknowledge the jurisdiction of the courts of the State of Wisconsin over my professional 7. conduct, and I agree to abide by the rules of the relevant division of the Circuit Court of the State of Wisconsin and the Wisconsin Court of Appeals and the Rules of Professional Conduct for Attorneys, if I am admitted pro hac vice; That I have complied fully with SCR Rule 10.03 (4); 8. That I am applying for admission pro hac vice for the following reasons: Long time client has been sued I have applied for admission pro hac vice in the courts of the State of Wisconsin ____ times previously in this calendar year. I attach hereto evidence of my payment or prior payment of the pro hac vice fee to the Office of Lawyer Regulation. Telephone Number Signature of Attorney Address of Principal Office



STATE O	F WISCONSIN, CIRCUIT COUR	T, WALWORTH COUNTY For Office Use	
		Application for Pro Hac Vice Case No. 11-cv-680 URY: NOLVATION For Off Quise For Off Quise	
WINDMIL	L COMMUNITIES LLC et al	Case No. 11-CV-680	
IDECLAF	RE UNDER PENALTY OF PERJ	URY:	
1.	in the above-captioned matter;	ce in order to represent <u>internact its Resente</u>	
2.		w in the highest court(s) of the state(s) or country(ies) of IL;	
3.	That there are no disciplinary complaints filed against me for violation of the rules of those courts (if so, please explain):;		
4.	incapacity in any jurisdiction (if	parred from practice for disciplinary reasons or reason of medical yes, please explain):	
5. That I am associated with Attorney Steven A. Koch , State Bar No. 01000281 , an active member of the State Bar of Wisconsin (name the member of the State Bar of Wisconsin and provide his/her Member Number);			
6.		it to practice law in the State of Wisconsin;	
7.	the state of the State of Wisconsin over my professional		
8.	That I have complied fully with	SCR Rule 10.03 (4);	
9.	for the following reacons:		
previous	ly in this calendar year.	in the courts of the State of Wisconsin times	
l attach Regulati	ion	prature or attorney Grature or attorney Gratuation of the pro hac vice fee to the Office of Lawyer Felephone Number GS [206 - 2300]	
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CIRCUIT COURT

WALWORTH COUNTY

FIRST BANKING CENTER,

Plaintiff.

-VS-

WINDMILL COMMUNITIES LLC, et al.

CASE NO.: 11-CV-680

Defendants.

ORDER TO ADMIT PRO HAC VICE

Based upon the Motion to Admit Pro Hac Vice, supporting Affidavit and all the files, records and proceedings herein,

IT IS HEREBY ORDERED, that Attorney Robert T. Hanlon of The Law Offices of Robert T. Hanlon & Associates, P.C., is granted leave to appear before this Court *pro hac vice* and to participate as counsel in the above-captioned matter in association with Seymour, Kremer, Koch & Lochowicz LLP.

Dated this ______, 2011.

BY THE COURT:
Hon. James L. Carlson

Circuit Court Judge

Drafted by: Attorney Steven A. Koch, SBN 0100281 SEYMOUR, KREMER, KOCH & LOCHOWICZ LLP P.O. Box 470 Elkhorn, WI 53121 (262) 723-5003