

STATE OF WISCONSIN
IN THE CIRCUIT COURT OF WALWORTH COUNTY

First Banking Center)
)
) Plaintiff,) CASE NO. 2011 CV 000680
)
 v.)
) Judge, James L. Carlson
 Windmill Communities LLC et al)
)
)
) Defendants.)

FILED
CIRCUIT COURT

AUG 9 - 2011 *K*

NOTICE OF MOTION


To: Cynthia Fletcher
8700 75th Street
Kenosha, WI 53142

CLERK OF COURTS - WALWORTH CO.
BY ELISABETH YAZBEC

PLEASE TAKE NOTICE that on August 9, at 9:00 we shall appear before the Honorable Judge James I. Carlson in Courtroom 3060 of the Circuit Court of Walworth County in the Walworth Judicial Center, Elkhorn Wisconsin, and shall then and there present **MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**, a copy of which is hereby served upon you.

Dated: August 9, 2011

Respectfully submitted,


/s/ Steven A. Koch
One of the Attorneys for Defendants
SBN 1000281

Steven A. Koch,
Seymour Kremer Koch & Lochowicz, LLP.
Atty. for Attorney for Defendants
23 N. Wisconsin St.
Elkhorn, WI 53121-0470
(262) 723-5003
(262) 723-6003 (fax)
WI Atty #01000281

STATE OF WISCONSIN
IN THE CIRCUIT COURT OF WALWORTH COUNTY

FIRST BANKING CENTER)

Plaintiff,)

v.)

WINDMILL COMMUNITIES LLC ET AL)

Defendants.)

CASE NO. 2011 CV 000680

Judge, James L. Carlson

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MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD

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Now Comes the Defendants, WINDMILL COMMUNITIES LLC AND

MICHAEL R. RESCHKE, (hereinafter collectively "Defendants") by and through their attorney, Steven A. Koch, of Seymour Kremer Koch & Lochowicz, LLP., with their motion for more time to answer or otherwise plead and state as follows:

1. Counsel for the Defendants was **recently retained to represent the named Defendants related to this cause of action.**
2. The Defendants have valid defenses in this cause including but not limited to a lack of standing on the part of the plaintiff to advance the cause of action.
3. **The Defendants sought out the counsel of a separate attorney and in fact actually hired a separate attorney to represent them in this case. However only in late July, did the Defendants learn that the original counsel was not able to proceed with their defense.**
4. That Defendants motions are likely to be voluminous because of the issues raised in both the complaint and numerous affirmative defenses available to the Defendants.

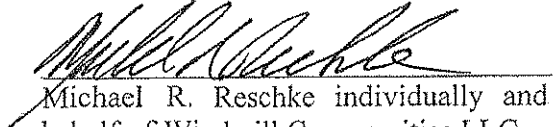
WHEREFORE, the Defendants pray this honorable court grant the following relief:

- a. Grant Defendants (WINDMILL COMMUNITIES LLC AND MICHAEL R. RESCHKE) and additional 28 days to answer or otherwise plead;
- b. For such other and further relief as this court deems equitable and just.

Respectfully submitted,


Steven A. Koch,
Seymour Kremer Koch & Lochowicz, LLP
Attorney for Defendants *SBN 1000281*

Dated: August 8, 2011


Michael R. Reschke individually and on
behalf of Windmill Communities LLC.

Steven A. Koch,
Seymour Kremer Koch & Lochowicz, LLP.
Atty. for Attorney for Defendants
23 N. Wisconsin St.
Elkhorn, WI 53121-0470
(262) 723-5003
(262) 723-6003 (fax)

WI Atty #01000281