UNITEDONE CREDIT UNION 1117 South 10th Street Manitowoc, WI 54420,

Plaintiff,

MAR 22 2013

v.

RICK L. SALTA 4101 Viebahn Street Manitowoc, WI 54220,

WISCONSIN DEPARTMENT OF REVENUE 2135 Rimrock Road Madison, WI 53708-8971,

JOSHUA A. WILSON 716 South 18<sup>th</sup> Street Manitowoc, WI 54220,

JOSEPH M. POHL 716 South 18th Street Manitowoc, WI 54220,

KAREN L. JELINEK 514 Huron Street Manitowoc, WI 54220,

MANITOWOC COUNTY CLERK OF CIRCUIT COURT 1010 South 8<sup>th</sup> Street Manitowoc, WI 54220,

MARINETTE COUNTY CHILD SUPPORT AGENCY 1926 Hall Avenue Marinette, WI 54143,

CELLCOM/NEW-CELL INC. 450 Security Blvd. Green Bay, WI 54313,

STATE OF WISCONSIN 17 West Main Street Madison, WI 53707, ORIGINAL FILED CASE NO.

'13 cy 0 1 7 5

CLERK OF CIRCUIT COURT MANITOWOC COUNTY, WISCONSIN

Case No.

Case Code: 30404 Foreclosure of Mortgage

HUNGERFORD INVESTIGATIVE
SERVICES
Date Of Service Self-13
Time Of Service 4FTPM
Served Upon: Munitonac Public Utilities
At 1303 South 8th Street
(Personal Service () Substitute Person
(Norporate Service () Positing
(Supervise)

Corporate Service () Sustant Service
(Supervise)

LAKEVIEW PSYCHOLOGICAL ASSOCIATES 1020 Maritime Drive Manitowoc, WI 54220,

MANITOWOC PUBLIC UTILITIES 1303 S. 8<sup>th</sup> Street Manitowoc, WI 54220,

SHEILA WERNER 4815 County Trunk Highway CR Manitowoc, WI 54220,

STACEY WERNER 4815 County Trunk Highway CR Manitowoc, WI 54220,

JEROME W. SCHULTZ 1821 Viebahn Street Manitowoc, WI 54220,

SMOKEY BARBIER HEATING, INC. 1516 Memorial Drive Manitowoc, WI 54220,

KARIE S. FORD 1905 Michigan Avenue Manitowoc, WI 54220,

HOLY FAMILY MEMORIAL INC. 2300 Western Avenue Manitowoc, WI 54220,

ANNA M. JASKOLSKI 1309 Hamilton Street Manitowoc, WI 54220,

Defendants.

#### **SUMMONS**

#### THE STATE OF WISCONSIN

To each person named above as a defendant:

You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you. The complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days, or within forty-five (45) days if Defendant is the State of Wisconsin or a division of the government of the State of Wisconsin or an insurance company, or within sixty (60) days if Defendant is the United States of America, after receiving this Summons, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the complaint. The Court may reject or disregard an answer that does not follow the requirements of the Statutes. The answer must be sent or delivered to the Court, which address is: Clerk of Circuit Court, Manitowoc County Courthouse, 1010 South 8th Street, Manitowoc, Wisconsin 54220, and to plaintiff's attorneys, Michael Best & Friedrich LLP, attention Attorney Timothy A. Burkard, 1000 Maritime Drive, Manitowoc, Wisconsin 54220. You may have an attorney help or represent you.

If you do not provide a proper answer within twenty (20) days, or within forty-five (45) days if Defendant is the State of Wisconsin or a division of the government of the State of Wisconsin or an insurance company, or within sixty (60) days if Defendant is the United States of America, the Court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 22 nd day of March, 2013.

MICHAEL BEST & FRIEDRICH LLP Attorneys for Plaintiff

By: Scale Part of Box 1018200

Timothy A. Burkard SBN 1018200

Michael Best & Friedrich LLP

1000 Maritime Drive

Manitowoc, Wisconsin 54220

(920) 686-2800

(920) 686-2810 (Facsimile)

Joseph D. Brydges SBN 1079318

Michael Best & Friedrich LLP

1 S Pinckney St # 700

PO Box 1806

Madison, WI 53701-1806

(608) 283-2262

(608) 283-2275 (Facsimile)

Michael Best & Friedrich LLP is attempting to collect a debt on our client's behalf and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

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UNITEDONE CREDIT UNION 1117 South 10th Street Manitowoc, WI 54420,

Plaintiff,

MAR 22 2013

v

RICK L. SALTA 4101 Viebahn Street Manitowoc, WI 54220, ORIGINAL FILED CASE NO.

13 cv 0 1 7 5

WISCONSIN DEPARTMENT OF REVENUE 2135 Rimrock Road Madison, WI 53708-8971,

Case No.

CLERK OF CIRCUIT COURT MANITOWOC COUNTY, WISCONSIN

JOSHUA A. WILSON 716 South 18<sup>th</sup> Street Manitowoc, WI 54220,

Case Code: 30404 Foreclosure of Mortgage

JOSEPH M. POHL 716 South 18th Street Manitowoc, WI 54220,

KAREN L. JELINEK 514 Huron Street Manitowoc, WI 54220,

MANITOWOC COUNTY CLERK OF CIRCUIT COURT 1010 South 8<sup>th</sup> Street Manitowoc, WI 54220,

MARINETTE COUNTY CHILD SUPPORT AGENCY 1926 Hall Avenue Marinette, WI 54143,

CELLCOM/NEW-CELL INC. 450 Security Blvd. Green Bay, WI 54313,

STATE OF WISCONSIN 17 West Main Street Madison, WI 53707, LAKEVIEW PSYCHOLOGICAL ASSOCIATES 1020 Maritime Drive Manitowoc, WI 54220,

MANITOWOC PUBLIC UTILITIES 1303 S. 8<sup>th</sup> Street Manitowoc, WI 54220,

SHEILA WERNER 4815 County Trunk Highway CR Manitowoc, WI 54220,

STACEY WERNER 4815 County Trunk Highway CR Manitowoc, WI 54220,

JEROME W. SCHULTZ 1821 Viebahn Street Manitowoc, WI 54220,

SMOKEY BARBIER HEATING, INC. 1516 Memorial Drive Manitowoc, WI 54220,

KARIE S. FORD 1905 Michigan Avenue Manitowoc, WI 54220,

HOLY FAMILY MEMORIAL INC. 2300 Western Avenue Manitowoc, WI 54220,

ANNA M. JASKOLSKI 1309 Hamilton Street Manitowoc, WI 54220,

Defendants.

#### **COMPLAINT**

Plaintiff, UnitedOne Credit Union, by and through its attorneys, Michael Best & Friedrich LLP, as and for its complaint against the above-named Defendants states as follows:

#### **PARTIES**

- 1. Plaintiff, UnitedOne Credit Union ("Plaintiff"), is a credit union with its principal office located at 1117 South 10th Street, Manitowoc, Wisconsin 54220. Plaintiff is qualified to do business in Wisconsin and is in the business of providing, among other things, financing to individuals and businesses.
- 2. Upon information and belief, Defendant, Rick L. Salta ("Salta"), is an adult resident of the State of Wisconsin residing at 4101 Viebahn Street, Manitowoc, Wisconsin 54220.
- 3. Upon information and belief, Defendant, Wisconsin Department of Revenue ("WDR"), is an executive branch department of the State of Wisconsin, created by and existing under Wis. Stat. §15.43, with its principal office at 2135 Rimrock Road, Madison, Wisconsin and its registered agent for service of process, upon information and belief, is Attorney General J.B. Van Hollen, 114 East Capitol, Madison, Wisconsin 53707-7857.
- 4. Upon information and belief, Defendant, Joshua A. Wilson ("Wilson"), is an adult resident of the State of Wisconsin residing at 716 South 18<sup>th</sup> Street, Manitowoc, Wisconsin 54220.
- 5. Upon information and belief, Defendant, Joseph M. Pohl ("Pohl"), is an adult resident of the State of Wisconsin residing at 716 South 18<sup>th</sup> Street, Manitowoc, Wisconsin 54220.
- 6. Upon information and belief, Defendant, Karen L. Jelinek ("Jelinek"), is an adult resident of the State of Wisconsin residing at 514 Huron Street, Manitowoc, WI 54220.
- 7. Upon information and belief, Defendant, Manitowoc County Clerk of Circuit Court, is the department head for the Circuit Court of Manitowoc County and is located at 1010 South 8<sup>th</sup> Street, Manitowoc, Wisconsin 54220.

- 8. Upon information and belief, Defendant, Marinette County Child Support Agency, is a government department under the Health and Family Services in Marinette County and is located at 1926 Hall Avenue, Marinette, Wisconsin 54143.
- 9. Upon information and belief, Defendant, Cellcom/New-Cell, Inc., is a Wisconsin Corporation located at 450 Security Boulevard, Green Bay, Wisconsin 54313 and has a registered agent listed as Mark Naze at 450 Security Boulevard, Green Bay, Wisconsin 54313.
- 10. Defendant, State of Wisconsin is a sovereign state of the United States with offices located at the State Capitol.
- 11. Upon information and belief, Defendant, Lakeview Psychological Associates, S.C., is a Wisconsin Service corporation located at 1020 Maritime Drive, Manitowoc, Wisconsin 54220 and has a registered agent listed as Daniel J. Burbach at 1020 Maritime Drive, Manitowoc, Wisconsin 54220.
- 12. Upon information and belief, Defendant, Manitowoc Public Utilities is a municipality owned electric and water company located at 1303 S. 8<sup>th</sup> Street, Manitowoc, Wisconsin 54220.
- 13. Upon information and belief, Defendant, Sheila Werner, is an adult resident of the State of Wisconsin residing at 4815 County Trunk Highway CR, Manitowoc, WI 54220.
- 14. Upon information and belief, Defendant, Stacey Werner, is an adult resident of the State of Wisconsin residing at 4815 Country Trunk Highway CR, Manitowoc, WI 54220.
- 15. Upon information and belief, Defendant, Jerome W. Schultz ("Schultz"), is an adult resident of the State of Wisconsin residing at 1821 Viebahn Street, Manitowoc, WI 54220.
- 16. Upon information and belief, Defendant, Smokey Barbier Heating, Inc., is a Wisconsin corporation located at 1516 Memorial Drive, Manitowoc, Wisconsin 54220 and has a

registered agent listed as Constance L. Barbier at 1516 Memorial Drive, Manitowoc, Wisconsin 54220.

- 17. Upon information and belief, Defendant, Karie S. Ford ("Ford"), is an adult resident of the State of Wisconsin residing at 1905 Michigan Avenue, Manitowoc, WI 54220.
- 18. Upon information and belief, Defendant, Holy Family Memorial, Inc., is a Wisconsin corporation located at 2300 Western Avenue, Manitowoc, Wisconsin 54220 and has a registered agent listed as Mark P. Herzog at 2300 Western Avenue, Manitowoc, Wisconsin 54220.
- 19. Upon information and belief, Defendant, Anna M. Jaskolski ("Jaskolski"), is an adult resident of the State of Wisconsin residing at 1309 Hamilton Street, Manitowoc, WI 54220.
- 20. For value received, Defendant, Salta, (the "Mortgagor Defendant") executed and delivered to Plaintiff the following notes (collectively, the "Notes"):

#### **NOTE SUMMARY**

| LOAN        | LOAN       | NOTE       | COLLATERAL   | PRINCIPAL    |
|-------------|------------|------------|--------------|--------------|
| NUMBER      | DATE       | TITLE      |              | AMOUNT       |
| xxxxxxxxxx- | 06/30/2011 | Business   | See Mortgage | \$26,970.52  |
| 0006        | ·          | Note       | Summary      |              |
| xxxxxxxxxx  | 09/01/2009 | Business   | See Mortgage | \$32,000.00  |
| 0027        |            | Note       | Summary      |              |
| xxxxxxxxxx- | 09/11/2009 | Business   | See Mortgage | \$22,222.30  |
| 0028        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 03/30/2010 | Business   | See Mortgage | \$41,600.00  |
| 0007        |            | Note       | Summary      |              |
| xxxxxxxxxx- | 05/27/2010 | Business   | See Mortgage | \$126,516.09 |
| 0009        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 12/11/2009 | Business   | See Mortgage | \$74,320.00  |
| 0029        |            | Note       | Summary      |              |
| xxxxxxxxxx- | 09/05/2008 | Business   | See Mortgage | \$52,800.00  |
| 0003        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 06/30/2011 | Business   | See Mortgage | \$95,784.10  |
| 0002        |            | Note       | Summary      |              |
| xxx5330- R1 | 04/22/2009 | Adjustable | See Mortgage | \$135,000.00 |
|             |            | Rate Note  | Summary      |              |

21. True copies of the above Notes are attached at Exhibit A.

22. As security for the above-referenced Notes, Mortgagor Defendant executed and delivered to Plaintiff the following mortgages (collectively, the "Mortgages") and assignments of leases and rents (collectively, the "Assignments of Leases and Rents") for the following described parcels of real estate:

## **MORTGAGE SUMMARY**

| LOAN<br>NUMBER      | PROPERTY STREET ADDRESS                            | PROPERTY LEGAL DESCRIPTION   | MORTGAGE  | ASSIGNMENT OF RENTS   |
|---------------------|--|--|---|---|
| xxxxxxxxx-<br>0006  | 813/815 Redfin Court<br>Manitowoc, WI              | Lot 15, Block 16, Custerdale Subdivision, according to the recorded plat thereof, City of Manitowoc, Manitowoc County, Wisconsin.  Tax ID: 052-220-016-150.00  | Dated December 17,<br>2009 recorded on<br>December 28, 2009,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2525, Page 322,<br>as Document No.<br>1076172    | Dated December 17,<br>2009, recorded on<br>December 28, 2009,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County<br>Vol. 2525, Page 325<br>as Document No.<br>1076173     |
| xxxxxxxxxx-<br>0027 | 1821 Viebahn Street<br>Manitowoc, WI               | The West Sixty-seven and One-half (67 ½) feet of the East Three Hundred Thirteen and One-half (313 ½) feet of the North Three Hundred Thirty (330) feet of the West One-half (W ½) of the Northeast Quarter (NE ¼) of the Northeast Quarter (NE ¼) of the Northwest Quarter (NW ¼) of Section Numbered Six (6), Township Numbered Eighteen (18) North, Range Numbered Twentyfour (24) East, in the Town of Manitowoc, Manitowoc County, Wisconsin.  EXCEPTING portion conveyed to Town of Manitowoc by Quit Claim Deed recorded in Volume 420 of Records, page 507, #440604. | Dated September 1, 2009, recorded on September 11, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2500, Page 425, as Document No. 1071340                          | Dated September 1,<br>2009, recorded on<br>September 11, 2009,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2500, Page 422,<br>as Document No.<br>1071339  |
|                     |  | Tax ID: 009-006-005-002.01   |   |   |
| xxxxxxxxx-<br>0028  | 1309 Hamilton Street<br>Manitowoc, WI              | The West 50 feet of Lot 1 of Block 313 in the City of Manitowoc, Manitowoc County, Wisconsin, according to the Recorded Plat thereof, known as the Original Plat of said City of Manitowoc.  Tax ID: 052-000-313-011.00  | Dated September 11,<br>2009, recorded on<br>September 11, 2009,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2500, Page 414,<br>as Document No.<br>1071336 | Dated September 11,<br>2009, recorded on<br>September 11, 2009,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2500, Page 416,<br>as Document No.<br>1071337 |
| xxxxxxxxx-<br>0007  | 716 South 18 <sup>th</sup> Street<br>Manitowoc, WI | Lot 10, Block 193, Original Plat, according to the recorded plat thereof, City of Manitowoc, Manitowoc County, Wisconsin.  | Dated February 20,<br>2009, recorded on<br>March 3, 2009, in the<br>Office of the Register<br>of Deeds for  | Dated February 20,<br>2009, recorded on<br>March 3, 2009, in the<br>Office of the Register<br>of Deeds for  |

| LOAN               | DRODERTY   | PROPERTY LEGAL  | MORTGAGE   | ASSIGNMENT OF  |
|--------------------|--|---|--|--|
| LOAN<br>NUMBER     | PROPERTY STREET ADDRESS                                | DESCRIPTION   | MORIGAGE   | RENTS  |
|                    |  | Tax ID: 052-000-193-100.00  | Manitowoc County,<br>Vol. 2439, Page 566,<br>as Document No.<br>1060396  | Manitowoc County,<br>Vol. 2439, Page 568,<br>as Document No.<br>1060397  |
| xxxxxxxxx-<br>0009 | 5304 South 10 <sup>th</sup><br>Street<br>Manitowoc, WI | Tract 6A of a Certified Survey in Government Lot Numbered One (1) of Section Numbered Eighteen (18), Township Numbered Eighteen (18) North, Range Numbered Twentyfour (24) East, in the Town of Manitowoc, being a Resurvey of Tract 6 of Certified Survey recorded in Volume 4 of Certified Survey Maps, page 373, as recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin, in Volume 7 of Certified Survey Maps, page 427, #525999.  Tax ID: 009-018-006-002.07        | Dated April 22, 2009, recorded on April 23, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2456, Page 280, as Document No. 1063446                                | Dated April 22, 2009, recorded on April 23, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2456, Page 282, as Document No. 1063447                                |
|                    |  | 1 ax 1D: 009-010-002.07   | ,  |  |
| xxxxxxxxx-<br>0029 | 4726 Hessel Court<br>Manitowoc, WI                     | Lot Two (2) of a Certified Survey in the Northwest Quarter (NW 1/4) of the Southeast Quarter (SE 1/4) of Section Twenty-six (26), Township Nineteen(19) North, Range Twenty-three (23) East, in the City of Manitowoc, being a Resurvey of Certified Survey recorded in Volume 23 of Certified Survey Maps, Page 51, #940614, as recorded in the Office of the Register Deed for Manitowoc County, Wisconsin in Volume 26 of Certified Survey Maps, Page 243, #1020716.  Tax ID: 052-826-402-120.00 | Dated December 11, 2009, recorded on December 18, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2524, Page 5, as Document No. 1075864                            | Dated December 11, 2009, recorded on December 18, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2524, Page 8, as Document No. 1075865                            |
| xxxxxxxxx-<br>0003 | 4815 CTY HWY CR<br>Manitowoc, WI                       | The South Eighty (80) feet of the North Two Hundred Sixty (260) feet of the West Two Hundred Forty-five (245) feet of the Southwest Quarter (SW 1/4) of the Southwest Quarter (SW 1/4) of Section Twelve (12), Township Eighteen (18) North, Range Twenty-three (23) East, Town of Newton, Manitowoc County by Deed recorded in Volume 200 of Deeds, page 164.  | Dated September 5,<br>2008, recorded on<br>September 12, 2008,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2402, Page 506,<br>as Document No.<br>1052845 | Dated September 5,<br>2008, recorded on<br>September 12, 2008,<br>in the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2402, Page 508,<br>as Document No.<br>1052846 |
|                    |  | Tax ID: 014-012-011-014.00  |  |  |

| LOAN<br>NUMBER     | PROPERTY<br>STREET<br>ADDRESS        | PROPERTY LEGAL DESCRIPTION  | MORTGAGE  | ASSIGNMENT OF RENTS  |
|--------------------|--------------------------------------|---|---|--|
| xxxxxxxxx-<br>0002 | 2529 Highway 42,<br>Manitowoc, WI    | Tract Numbered Two (2) of a Certified Survey in the Southeast Quarter (SE ¼) of the Southeast Quarter (SE ¼) of Section Numbered Thirty-four (34), Township Numbered Nineteen (19) North, Range Numbered Twenty-three (23) East in the Town of Manitowoc Rapids as recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 24 of Certified Survey Maps, page 241, #976984.                  | Dated March 11,<br>2005, recorded on<br>March 22, 2005, in<br>the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2065, Page 528,<br>as Document No.<br>984700                              | Dated March 11,<br>2005, recorded on<br>March 22, 2005, in<br>the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2065, Page 526,<br>as Document No.<br>984699 |
|                    |                                      | Tax ID: 010-034-016-008.01  | ·   |  |
| xxx5330- R1        | 4101 Viebahn Street<br>Manitowoc, WI | Tract Numbered Five (5) of a Certified Survey in the Northwest Quarter (NW 1/4) of the Northwest Quarter (NW 1/4) of Section Numbered One (1), Township Numbered Eighteen (18) North, Range Numbered Twenty-three (23) East, in the City of Manitowoc, as recorded in the Office of The Register of Deeds for Manitowoc County, Wisconsin in Volume 2 of Certified Survey Maps, page 165, #421510.  Tax ID: 52-801-202-020.00 | Dated April 22, 2009, recorded on April 24, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2456, Page 507, as Document No. 1063484  & Adjustable Rate Rider Vol. 2456, Pages 521 - 523 | N/A  |

- 23. True Copies of the Mortgages and Assignments of Rents and Leases are attached at **Exhibit B**.
- 24. On November 14, 2011, Mortgagor Defendant executed and delivered to Plaintiff a Loan Modification Agreement for Loan No. 0029 ("Loan No. 0029 Modification Agreement") with the following terms effective October 11, 2011 through December 11, 2012 ("Modification Term for Loan No. 0029"): (i) interest shall be 6.25% fixed rate, and (ii) monthly payments of principal and interest shall be \$457.79 due and payable on the 11<sup>th</sup> day of November, 2011 and each month thereafter during the Modification Term for Loan No. 0029. Upon expiration of the Modification Term for Loan No. 0029, the final payment will be due on December 11, 2012 and

will consist of the unpaid principal and all accrued interest remaining due. A copy of the Loan No. 0029 Modification Agreement is attached hereto as **Exhibit C**.

- 25. On November 14, 2011, Mortgagor Defendant executed and delivered to Plaintiff a Loan Modification Agreement for Loan No. 0003 ("Loan No. 0003 Modification Agreement") with the following terms effective September 5, 2011 through September 5, 2012 (the "Modification Term for Loan No. 0003"), the Note is amended as follows: (i) interest shall be 6.5% per annum, a fixed rate, and (ii) monthly payments of principal and interest shall be \$333.84 due and payable on the 5<sup>th</sup> day of September, 2011 and each month thereafter during the Modification Term for Loan No. 0003, the final payment will be due on September 5, 2012 and will consist of the unpaid principal and all accrued interest remaining due. A copy of the Loan No. 0003 Modification Agreement is attached hereto as **Exhibit D**.
- 26. Mortgagor Defendant defaulted under the Notes by (i) failing to make monthly payments when due, and (ii) by failing to pay real estate taxes on the following properties when due (collectively the "Defaults"):

### PAST DUE REAL ESTATE TAX SUMMARY

| LOAN<br>NUMBER | PROPERTY<br>STREET<br>ADDRESS                      | <u>Tax ID</u>              | PAST DUE REAL<br>ESATE TAXES             |
|----------------|--|----------------------------|--|
| xxxxxxxxx-     | 1821 Viebahn Street                                | Tax ID: 009-006-005-002.01 | \$1,031.14, plus                         |
| 0027           | Manitowoc, WI                                      |                            | penalties and interest                   |
| xxxxxxxxxx     | 1309 Hamilton Street                               | Tax ID: 052-000-313-011.00 | \$967.76, plus                           |
| 0028           | Manitowoc, WI                                      |                            | penalties and interest                   |
| 0007           | 716 South 18 <sup>th</sup> Street<br>Manitowoc, WI | Tax ID: 052-000-193-100.00 | \$927.95, plus<br>penalties and interest |

| xxxxxxxxxx<br>0003 | 4815 CTY HWY CR<br>Manitowoc, WI     | Tax ID: 014-012-011-014.00 | \$1,447.54, plus<br>penalties and interest |
|--------------------|--------------------------------------|----------------------------|--|
| xxxxxxxxxx<br>0002 | 2529 Highway 42,<br>Manitowoc, WI    | Tax ID: 010-034-016-008.01 | \$568.93, plus penalties and interest      |
| xxx5330- R1        | 4101 Viebahn Street<br>Manitowoc, WI | Tax ID: 52-801-202-020.00  | \$829.71, plus penalties and interest      |

- 27. Plaintiff has either provided Mortgagor Defendant with all notices that may be required to foreclose the Mortgages or the Mortgagor Defendant has waived his right to receive such notices.
  - 28. Plaintiff has performed all other conditions to foreclose the Mortgages.
- 29. As a result of Mortgagor Defendant's failure to cure the Defaults, the entire unpaid balance due under the Notes and Mortgages has been accelerated and are now due and payable in full.
- 30. Mortgagor Defendant failed and continues to fail to cure the Defaults or to pay the amounts due and owing to Plaintiff under the Notes and Mortgages.
- 31. As of March 20, 2013, the following amounts are due and owing to Plaintiff under the Notes and Mortgages:

| LOAN<br>NUMBER      | PRINCIPAL    | INTEREST   | LATE FEES  | TOTAL DUE EXCEEDS |
|---------------------|--------------|------------|------------|-------------------|
| xxxxxxxxxx<br>0006  | \$26,604.03  | \$1,116.09 | \$116.34   | \$27,836.46       |
| xxxxxxxxxx-<br>0027 | \$31,447.77  | \$1,414.92 | \$3,163.97 | \$36,026.66       |
| xxxxxxxxxx-<br>0028 | \$21,488.92  | \$592.30   | \$14.74    | \$22,095.96       |
| 0007                | \$40,845.91  | \$1,713.57 | \$181.51   | \$42,740.99       |
| xxxxxxxxxx-<br>0009 | \$123,518.44 | \$5,181.85 | \$545.65   | \$129,245.94      |
| xxxxxxxxxx-<br>0029 | \$72,526.10  | \$3,278.58 | \$7,580.47 | \$83,385.15       |

| TOTAL AMOUNT DUE AND OWING ON ALL NOTES AND MORTGAGES EXCEEDS |              |            |            | \$628,826.45              |
|---|--------------|------------|------------|---------------------------|
| xxx5330- R1   | \$126,226.65 | \$2,430.12 | \$200.34   | \$130,319.94 <sup>1</sup> |
| 0002  | \$94,485.53  | \$3,963.86 | \$413.07   | \$98,862.46               |
| xxxxxxxxxx-<br>0003   | \$50,650.29  | \$2,361.43 | \$5,301.17 | \$58,312.89               |

- 32. The Notes provide that Plaintiff has the right to recover all of its costs and expenses in enforcing the Notes to the extent not prohibited by applicable law, including, without limitation, reasonable attorney's fees. The Mortgages provide that Plaintiff is entitled to collect all expenses incurred in pursuing the remedies provided in the Mortgages including, but not limited to, reasonable attorney's fees and cost of title evidence.
  - 33. At the commencement of this action, the Properties are occupied as follows:

| LOAN        | PROPERTY STREET                   | RESIDENCE     | OCCUPIED      |
|-------------|-----------------------------------|---------------|---------------|
| NUMBER      | ADDRESS                           |               | <u>STATUS</u> |
| xxxxxxxxxx- | 813/815 Redfin Court              | 1 to 4 Family | Not Owner     |
| 0006        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx- | 1821 Viebahn Street               | 1 to 4 Family | Not Owner     |
| 0027        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx- | 1309 Hamilton Street              | 1 to 4 Family | Not Owner     |
| 0028        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx- | 716 South 18 <sup>th</sup> Street | 1 to 4 Family | Not Owner     |
| 0007        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx  | 5304 South 10th Street            | 1 to 4 Family | Not Owner     |
| 0009        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx- | 4726 Hessel Court                 | 1 to 4 Family | Not Owner     |
| 0029        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx  | 4815 CTY HWY CR                   | 1 to 4 Family | Not Owner     |
| 0003        | Manitowoc, WI                     | Residence     | Occupied      |
| xxxxxxxxxx- | 2529 Highway 42,                  | 1 to 4 Family | Not Owner     |
| 0002        | Manitowoc, WI                     | Residence     | Occupied      |
| xxx5330- R1 | 4101 Viebahn Street               | 1 to 4 Family | Owner         |
|             | Manitowoc, WI                     | Residence     | Occupied      |

34. The Properties are on real estate of 20 acres or less, and each individual property cannot be sold in parcels without injury to the interests of the parties.

<sup>&</sup>lt;sup>1</sup> This amount includes a balance due and owing from Mortgagor Defendant for taxes and insurance in the amount of \$1,462.83.

35. Pursuant to Chapter 846 of the Wisconsin Statutes, the applicable redemption periods prior to the sales of the Properties are as follows:

| LOAN NUMBER     | PROPERTY STREET ADDRESS   | REDEMPTION PERIOD FROM THE DATE OF JUDGMENT |
|-----------------|---|---|
| xxxxxxxxxx-0006 | 813/815 Redfin Court<br>Manitowoc, WI<br>("Redfin Property")                              | 6 Months                                    |
| xxxxxxxxxx-0027 | 1821 Viebahn Street<br>Manitowoc, WI<br>("1821 Viebahn Property")                         | 6 Months                                    |
| xxxxxxxxxx-0028 | 1309 Hamilton Street<br>Manitowoc, WI<br>("Hamilton Property")                            | 6 Months                                    |
| xxxxxxxxxx-0007 | 716 South 18 <sup>th</sup> Street<br>Manitowoc, WI<br>("South 18 <sup>th</sup> Property") | 6 Months                                    |
| xxxxxxxxxx-0009 | 5304 South 10 <sup>th</sup> Street<br>Manitowoc, WI                                       | 6 Months                                    |
| xxxxxxxxxx-0029 | 4726 Hessel Court<br>Manitowoc, WI<br>("Hessel Property")                                 | 6 Months                                    |
| xxxxxxxxxx-0003 | 4815 CTY HWY CR<br>Manitowoc, WI<br>("Hwy CR Property")                                   | 6 Months                                    |
| xxxxxxxxxx-0002 | 2529 Highway 42,<br>Manitowoc, WI<br>("Hwy 42 Property")                                  | 6 Months                                    |
| xxx5330- R1     | 4101 Viebahn Street<br>Manitowoc, WI<br>("4101 Viebahn Property")                         | 12 Months                                   |

- 36. If any of the Properties become abandoned the applicable redemption period prior to sale of the Property is five (5) weeks from the date of judgment in accordance with §846.102, Wis. Stats.
  - 37. Plaintiff is the lawful owner and holder of the Notes and Mortgages.
- 38. Defendant, Wisconsin Department of Revenue, has or may have an interest in the Properties located at 813/815 Redfin Court, 1821 Viebahn Street, 1309 Hamilton Street, 4101 Viebahn Street, 2529 Highway 42, 4726 Hessel Court, 4815 County Trunk Highway CR, 5304

South 10<sup>th</sup> Street, and 716 South 18<sup>th</sup> Street (described fully in <u>Paragraph 22</u> above), by virtue of State Tax Liens docketed in Manitowoc County, Wisconsin on April 12, 2010 in Case No. 2010TW000070 in the amount of \$73,031.71 and on May 16, 2012 in Case No. 2012TW000065 in the amount of \$3,869.55. The interest or liens, if any, of Wisconsin Department of Revenue in and to the properties listed above is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.

- 39. Defendant, Jerome W. Schultz, has or may have an interest in the property located at 1821 Viebahn Street (see <u>Paragraph 22</u> above for full description) pursuant to a Land Contract between Mortgagor Defendant, as Vendor and Jerome Schultz a/k/a Jerome W. Schultz, as Vendee, recorded in the Office of the Register of Deeds of Manitowoc County on December 2, 2009, in Volume 2520, Page 96 as Document No. 1075097. The interest or lien, if any, of Jerome W. Schultz, in and to the property located at 1821 Viebahn Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 40. Defendant, Smokey Barbier Heating, Inc., has or may have an interest in the property located at 1821 Viebahn Street (see <u>Paragraph 22</u> above for full description) pursuant to a Judgment against Jerome W. Schultz docketed on November 29, 2012 in Manitowoc County Case No. 2012SC001760 in the amount of \$873.79. The interest or lien, if any, of Smokey Barbier Heating, Inc., in and to the property located at 1821 Viebahn Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 41. Defendant, Karie S. Ford, has or may have an interest in the property located at 1309 Hamilton Street (see <u>Paragraph 22</u> above for full description) pursuant to a Land Contract between Mortgagor Defendant, as Vendor and Karie Ford, as Purchaser, recorded in the Office of the Register of Deeds for Manitowoc County on October 5, 2009, Volume 2505, Page 608, as Document No. 1072377. The interest or lien, if any, of Karie S. Ford, in and to the property

located at 1309 Hamilton Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.

- 42. Defendants, Joshua A. Wilson and Anna M. Jaskolski, has or may have an interest in the property located at 1309 Hamilton Street (see <u>Paragraph 22</u> above for full description) pursuant to a Quit Claim Deed between Karie Ford and Joshua A. Wilson and Anna M. Jaskolski, as joint tenants, recorded on April 4, 2011 in the Office of the Register of Deeds for Manitowoc County on April 4, 2011, in Volume 2635, Page 676, as Document No. 1097530. The interest or lien, if any, of Joshua A. Wilson and Anna M. Jaskolski, in and to the property located at 1309 Hamilton Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 43. Defendant, Holy Family Memorial Inc., has or may have an interest in the property located at 1309 Hamilton Street (see <u>Paragraph 22</u> above for full description) pursuant to a Judgment against Karie S. Ford docketed on December 28, 2010 in Manitowoc County Case No. 2010SC001562 in the amount of \$1,720.10. The interest or lien, if any, of Holy Family Memorial Inc. in and to the property located at 1309 Hamilton Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 44. Defendant, Marinette County Child Support Agency, has or may have an interest in the properties located at 1309 Hamilton Street and 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full descriptions) pursuant to a Child Support Lien in favor of the Marinette County Child Support Agency against Joshua A. Wilson, docketed on April 6, 2008 in the amount of \$1,462.76 as Docket # 255975. The interest or liens, if any, of the Marinette County Child Support Agency in and to the properties listed above is subsequent, subordinate, and junior to the

lien of Plaintiff as set forth herein.

- 45. Defendant, Manitowoc County Clerk of Circuit Court, has or may have an interest in the properties located at 1309 Hamilton Street and 716 South 18<sup>th</sup> Street (see Paragraph 22 above for full description) pursuant to the following judgments against Joshua A. Wilson, (1) docketed on November 23, 2005 in Manitowoc County Case No. 05TR3518 in the amount of \$210.50; (2) docketed on November 23, 2005 in Manitowoc County Case No. 05TR3519 in the amount of \$135.50; (3) docketed on September 2, 2008 in Manitowoc County Case No. 2007CM000810 in the amount of \$84.00; (4) docketed on June 11, 2010 in Manitowoc County Case No. 2010TR001267 in the amount of \$200.50; and (5) docketed on October 12, 2011 in Manitowoc County Case No. 2011CT000138 in the amount of \$243.50. The interest or liens, if any, of the Manitowoc County Clerk of Circuit Court in and to the properties listed above is subsequent, subordinate and junior to the lien of Plaintiff as set forth herein.
- 46. Defendant, Manitowoc County Clerk of Circuit Court, has or may have an interest in the property located at 1309 Hamilton Street (see <u>Paragraph 22</u> above for full description) pursuant to a judgment against Anna M. Jaskolski docketed on March 14, 2006 in Manitowoc County Case No. 2002FA000262 in the amount of \$192.75. The interest or lien, if any, of the Manitowoc County Clerk of Circuit Court in and to the property located at 1309 Hamilton Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 47. Defendant, Joshua A. Wilson, has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to a Land Contract between Mortgagor Defendant, as Vendor and Joshua A. Wilson, as Purchaser, recorded on December 2, 2009 in the Office of the Register of Deeds for Manitowoc County in Volume 2520, Page 100, as Document No. 1075098. The interest or lien, if any, of Joshua A. Wilson in and to the property located at 716 South 18<sup>th</sup> Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.

- 48. Defendant, Karen Jelinek, has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to an Assignment of Land Contract between Karen Jelinek, as Assignee, and Joshua A. Wilson, as Assignor, recorded on May 27, 2011 in the Office of the Register of Deeds for Manitowoc County in Volume 2645, Page 623, as Document No. 1099647. The interest or lien, if any, of Karen Jelinek in and to the property located at 716 South 18<sup>th</sup> Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 49. Defendant, Cellcom / New- Cell Inc., has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to a judgment against Karen Jelinek docketed on July 20, 2006 in Manitowoc County Case No. 2006SC000868 in the amount of \$1,064.04. The interest or lien, if any, of Cellcom / New-Cell Inc., in and to the property located at 716 South 18th Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 50. Plaintiff, UnitedOne Credit Union has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to a judgment against Karen Jelinek docketed on March 25, 2009 in Manitowoc County Case No. 2009SC000291 in the amount of \$723.57. This lien in favor of Plaintiff, UnitedOne Credit Union in and to the property located at 716 South 18<sup>th</sup> Street is subsequent, subordinate and junior to the Plaintiff's lien pursuant to the Notes and Mortgages as set forth herein.
- 51. Defendant, Joseph M. Pohl, has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to an Assignment of Land Contract between Joseph M. Pohl, as Assignee, and Karen Jelinek, as Assignor recorded on June 4, 2012 in the Office of the Register of Deeds for Manitowoc County in Volume 2727, Page 535 as Document No. 1115378. The interest or lien, if any, of Joshua M. Pohl in and to the

property located at 716 South 18th Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.

- 52. Defendant, State of Wisconsin, has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to a judgment against Joseph M. Pohl docketed on November 11, 2002 in Manitowoc County Case No. 2001TR005112 in the amount of \$10.00. The interest or lien, if any, of the State of Wisconsin, in and to property located at 716 South 18th Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- Defendant, Lakeview Psychological Associates, has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to a judgment against Joseph M. Pohl docketed on September 15, 2003 in Manitowoc County Case No. 2003SC001194 in the amount of \$851.58. The interest or lien, if any, of Lakeview Psychological Associates in and to the property located at 716 South 18th Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 54. Defendant, Manitowoc Public Utilities, has or may have an interest in the property located at 716 South 18<sup>th</sup> Street (see <u>Paragraph 22</u> above for full description) pursuant to a judgment against Joseph M. Pohl docketed on May 14, 2008 in Manitowoc County Case No. 2008SC000426 in the amount of \$225.00. The interest or lien, if any, of Manitowoc Public Utilities in and to the property located at 716 South 18th Street is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 55. Defendants, Stacey Werner and Sheila Werner, has or may have an interest in the property located at 4815 County Trunk Highway CR (see <u>Paragraph 22</u> above for full description) pursuant to a Land Contract between Mortgagor Defendant, as Vendor and Stacey Werner and Sheila Werner, husband and wife, as survivorship marital property, as Purchaser,

docketed on October 5, 2009 in the Office of the Register of Deeds for Manitowoc County in Volume 2505, Page 623, as Document No. 1072381. The interest or lien, if any, of Stacey Werner and Sheila Werner in and to the property located at 4815 County Trunk Highway CR is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.

- 56. Defendant, Lakeview Psychological Associates, has or may have an interest in the property located at 4815 County Trunk Highway CR (see Paragraph 22 above for full description) pursuant to a judgment against Sheila Werner and Stacey E. Werner docketed on May 12, 2010 in Manitowoc County Case No. 2010SC000547 in the amount of \$433.50. The interest or lien, if any, of Lakeview Psychological Associates in and to the property located at 4815 County Trunk Highway CR is subsequent, subordinate, and junior to the lien of Plaintiff as set forth herein.
- 57. No proceedings have been had at law or otherwise for the recovery of the sums due under and secured by the Notes and Mortgages.
- 58. Plaintiff has complied with all of the terms and conditions of the Notes and Mortgages.
- 59. Upon information and belief, the Defendant, Rick L. Salta, is not in "active service," "active duty" or "military service" of the United States, or any branch of the military service of the United States, national guard, or state defense force as defined in 10 U.S.C. §101 or in the Servicemembers Civil Relief Act, 50 U.S.C. App. §§501 to 596, or in any "period of state active duty" as defined in §321.62, Wis. Stats.
- 60. If Mortgagor Defendant fails to redeem the properties referenced above in Paragraph 33, Plaintiff makes a personal claim against Mortgagor Defendant for any deficiency that may result after confirmation of sale of the Property pursuant to Wis. Stat. §846.04 and

Mortgagor Defendant shall be personally responsible, for the payment of such sums by reason of the execution and delivery of said Notes and Mortgages.

## WHEREFORE, Plaintiff demands judgment as follows:

- A. Foreclosure and sale of the Properties as provided by law and pursuant to Chapter 846, Wis. Stats.;
- **B.** That, in the event any of the Properties is abandoned after the commencement of this action, Plaintiff shall be entitled to have a receiver appointed to prevent the commission of waste upon said property and to proceed as provided by law with a redemption period of five (5) weeks prior to sale of said property, pursuant to §846.102, Wis. Stats.;
- C. The amounts due Plaintiff for principal, interest, taxes, costs, disbursements, reasonable attorneys' fees, insurance premiums, and repairs which now may be unpaid or may accrue prior to sale, be adjudged and determined;
- **D.** The above-captioned Defendants, and all persons claiming through or under the above-captioned Defendants, be barred and foreclosed of all right, title, or equity of redemption in or to the Properties, except the right to redeem the same before sale as provided by law;
- E. The Properties be adjudged to be sold unless redeemed within the time and in the manner provided by law. That Plaintiff be paid the amount due on the Notes and Mortgages with interest due at the time of such payment, together with the costs and disbursements of this action and reasonable attorneys' fees, and such additional amounts as Plaintiff may advance for payment of taxes, fees, and insurance upon the Properties with interest on the same as allowed by law from the date of judgment out of the proceeds of such sale;
- F. The above-captioned Defendants, and all persons claiming through or under the above-captioned Defendants, and persons occupying the Properties, be enjoined and restrained

from committing waste on said Property or doing any other act that may impair the value of the Property during the pendency of the action;

- G. Plaintiff be entitled to a judgment and execution against Mortgagor Defendant for any deficiency remaining unpaid after applying the proceeds of said sales of the Properties;
- H. Plaintiff be entitled to receive all rental payments from tenants occupying the Properties pursuant to the Mortgages and Assignments.
- I. That Plaintiff have such other and further judgment or relief that the Court deems just and equitable.

Dated this 12 nd day of March, 2013, at Manitowoc, Wisconsin.

MICHAEL BEST & FRIEDRICH LLP Attorneys for Plaintiff

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Michael Best & Friedrich LLP is attempting to collect a debt on our client's behalf and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

Creditor:

**UnitedOne Credit Union** 

Debtor(s):

Rick L. Salta

Date:

March 19, 2013

# NOTICE REQUIRED BY THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1601, as Amended

1. The amount of the debts as of March 20, 2013 is as follows:

| LOAN<br>NUMBER             | PRINCIPAL                   | INTEREST      | LATE FEES  | TOTAL DUE EXCEEDS         |
|----------------------------|-----------------------------|---------------|------------|---------------------------|
| xxxxxxxxxx-<br>0006        | \$26,604.03                 | \$1,116.09    | \$116.34   | \$27,836.46               |
| xxxxxxxxxx-<br>0027        | \$31,447.77                 | \$1,414.92    | \$3,163.97 | \$36,026.66               |
| xxxxxxxxxx<br>0028         | \$21,488.92                 | \$592.30      | \$14.74    | \$22,095.96               |
| xxxxxxxxxx-<br>0007        | \$40,845.91                 | \$1,713.57    | \$181.51   | \$42,740.99               |
| xxxxxxxxxx<br>0009         | \$123,518.44                | \$5,181.85    | \$545.65   | \$129,245.94              |
| xxxxxxxxxx-<br>0029        | \$72,526.10                 | \$3,278.58    | \$7,580.47 | \$83,385.15               |
| xxxxxxxxxx-<br>0003        | \$50,650.29                 | \$2,361.43    | \$5,301.17 | \$58,312.89               |
| xxxxxxxxxx-<br>0002        | \$94,485.53                 | \$3,963.86    | \$413.07   | \$98,862.46               |
| xxx5330- R1                | \$126,226.65                | \$2,430.12    | \$200.34   | \$130,319.94 <sup>2</sup> |
| TOTAL AMOUN<br>MORTGAGES E | NT DUE AND OWING<br>EXCEEDS | G ON ALL NOTE | S AND      | \$628,826.45              |

- 2. The creditor to whom the debt is owed is UnitedOne Credit Union.
- 3. The debt is evidenced by the following Notes and Mortgages:

## **NOTE SUMMARY**

| LOAN       | LOAN       | NOTE     | COLLATERAL   | PRINCIPAL   |
|------------|------------|----------|--------------|-------------|
| NUMBER     | DATE       | TITLE    |              | AMOUNT      |
| xxxxxxxxxx | 06/30/2011 | Business | See Mortgage | \$26,970.52 |
| 0006       |            | Note     | Summary      | ·           |
| xxxxxxxxxx | 09/01/2009 | Business | See Mortgage | \$32,000.00 |
| 0027       |            | Note     | Summary      |             |
| xxxxxxxxxx | 09/11/2009 | Business | See Mortgage | \$22,222.30 |

<sup>&</sup>lt;sup>2</sup> This amount includes a balance due and owing from Mortgagor Defendant for taxes and insurance in the amount of \$1,462.83.

| LOAN        | LOAN       | NOTE       | COLLATERAL   | PRINCIPAL    |
|-------------|------------|------------|--------------|--------------|
| NUMBER      | DATE       | TITLE      |              | AMOUNT       |
| 0028        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 03/30/2010 | Business   | See Mortgage | \$41,600.00  |
| 0007        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 05/27/2010 | Business   | See Mortgage | \$126,516.09 |
| 0009        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 12/11/2009 | Business   | See Mortgage | \$74,320.00  |
| 0029        |            | Note       | Summary      |              |
| xxxxxxxxxx  | 09/05/2008 | Business   | See Mortgage | \$52,800.00  |
| 0003        |            | Note       | Summary      |              |
| xxxxxxxxxx- | 06/30/2011 | Business   | See Mortgage | \$95,784.10  |
| 0002        |            | Note       | Summary      |              |
| xxx5330- R1 | 04/22/2009 | Adjustable | See Mortgage | \$135,000.00 |
|             |            | Rate Note  | Summary      |              |

# MORTGAGE SUMMARY

| LOAN          | PROPERTY             | PROPERTY LEGAL  | <u>MORTGAGE</u>                         | ASSIGNMENT OF                        |
|---------------|----------------------|---|---|--------------------------------------|
| <u>NUMBER</u> | STREET               | DESCRIPTION   |   | <u>rents</u>                         |
|               | <u>ADDRESS</u>       |   |   |                                      |
| xxxxxxxxxx-   | 813/815 Redfin Court | Lot 15, Block 16, Custerdale                                | Dated December 17,                      | Dated December 17,                   |
| 0006          | Manitowoc, WI        | Subdivision, according to the                               | 2009 recorded on                        | 2009, recorded on                    |
|               |                      | recorded plat thereof, City of                              | December 28, 2009,                      | December 28, 2009,                   |
|               |                      | Manitowoc, Manitowoc County,                                | in the Office of the                    | in the Office of the                 |
|               | ·                    | Wisconsin.  | Register of Deeds for                   | Register of Deeds for                |
| ļ             |                      | •   | Manitowoc County,                       | Manitowoc County                     |
|               |                      | Tax ID: 052-220-016-150.00                                  | Vol. 2525, Page 322,                    | Vol. 2525, Page 325                  |
|               |                      |   | as Document No.                         | as Document No.<br>1076173           |
|               |                      | GT 77 . C'  | 1076172                                 |                                      |
| xxxxxxxxxx-   | 1821 Viebahn Street  | The West Sixty-seven and One-half                           | Dated September 1,<br>2009, recorded on | Dated September 1, 2009, recorded on |
| 0027          | Manitowoc, WI        | (67 ½) feet of the East Three Hundred Thirteen and One-half | September 11, 2009,                     | September 11, 2009,                  |
|               |                      | (313 ½) feet of the North Three                             | in the Office of the                    | in the Office of the                 |
|               |                      | Hundred Thirty (330) feet of the                            | Register of Deeds for                   | Register of Deeds for                |
|               |                      | West One-half (W ½) of the                                  | Manitowoc County,                       | Manitowoc County,                    |
|               | •                    | Northeast Quarter (NE ½) of the                             | Vol. 2500, Page 425,                    | Vol. 2500, Page 422,                 |
|               |                      | Northeast Quarter (NE ¼) of the                             | as Document No.                         | as Document No.                      |
|               |                      | Northwest Quarter (NW 1/4) of                               | 1071340                                 | 1071339                              |
|               |                      | Section Numbered Six (6),                                   |   |                                      |
|               |                      | Township Numbered Eighteen (18)                             | *                                       |                                      |
|               | ,                    | North, Range Numbered Twenty-                               |   |                                      |
|               |                      | four (24) East, in the Town of                              |   |                                      |
|               |                      | Manitowoc, Manitowoc County,                                |   |                                      |
|               | ,                    | Wisconsin.  |   | ·                                    |
|               |                      |   |   |                                      |
|               |                      | EXCEPTING portion conveyed to                               | . '                                     |                                      |
|               |                      | Town of Manitowoc by Quit Claim                             |   |                                      |
|               |                      | Deed recorded in Volume 420 of                              |   |                                      |
|               |                      | Records, page 507, #440604.                                 |   |                                      |
|               |                      | ·   |   |                                      |
|               |                      | Tax ID: 009-006-005-002.01                                  |   |                                      |
|               |                      |   |   |                                      |
|               |                      |   |   |                                      |

| LOAN<br>NUMBER                         | PROPERTY STREET ADDRESS                            | PROPERTY LEGAL DESCRIPTION   | <u>MORTGAGE</u>   | ASSIGNMENT OF RENTS   |
|--|--|--|---|---|
| xxxxxxxxx-<br>0028                     | 1309 Hamilton Street<br>Manitowoc, WI              | The West 50 feet of Lot 1 of Block 313 in the City of Manitowoc, Manitowoc County, Wisconsin, according to the Recorded Plat thereof, known as the Original Plat of said City of Manitowoc.  Tax ID: 052-000-313-011.00  | Dated September 11, 2009, recorded on September 11, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2500, Page 414, as Document No. 1071336                   | Dated September 11, 2009, recorded on September 11, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2500, Page 416, as Document No. 1071337                   |
| ************************************** | 716 South 18 <sup>th</sup> Street<br>Manitowoc, WI | Lot 10, Block 193, Original Plat, according to the recorded plat thereof, City of Manitowoc, Manitowoc County, Wisconsin.  Tax ID: 052-000-193-100.00  | Dated February 20,<br>2009, recorded on<br>March 3, 2009, in the<br>Office of the Register<br>of Deeds for<br>Manitowoc County,<br>Vol. 2439, Page 566,<br>as Document No.<br>1060396 | Dated February 20,<br>2009, recorded on<br>March 3, 2009, in the<br>Office of the Register<br>of Deeds for<br>Manitowoc County,<br>Vol. 2439, Page 568,<br>as Document No.<br>1060397 |
| xxxxxxxxx-<br>0009                     | 5304 South 10 <sup>th</sup> Street Manitowoc, WI   | Tract 6A of a Certified Survey in Government Lot Numbered One (1) of Section Numbered Eighteen (18), Township Numbered Eighteen (18) North, Range Numbered Twentyfour (24) East, in the Town of Manitowoc, being a Resurvey of Tract 6 of Certified Survey recorded in Volume 4 of Certified Survey Maps, page 373, as recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin, in Volume 7 of Certified Survey Maps, page 427, #525999.  Tax ID: 009-018-006-002.07 | Dated April 22, 2009, recorded on April 23, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2456, Page 280, as Document No. 1063446                           | Dated April 22, 2009, recorded on April 23, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2456, Page 282, as Document No. 1063447                           |
| xxxxxxxxx-<br>0029                     | 4726 Hessel Court<br>Manitowoc, WI                 | Lot Two (2) of a Certified Survey in the Northwest Quarter (NW ¼) of the Southeast Quarter (SE ¼) of Section Twenty-six (26), Township Nineteen(19) North, Range Twenty-three (23) East, in the City of Manitowoc, being a Resurvey of Certified Survey recorded in Volume 23 of Certified Survey Maps, Page 51, #940614, as recorded in the Office of the Register Deed for Manitowoc County, Wisconsin in Volume 26 of Certified Survey Maps, Page 243, #1020716.                          | Dated December 11, 2009, recorded on December 18, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2524, Page 5, as Document No. 1075864                       | Dated December 11, 2009, recorded on December 18, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2524, Page 8, as Document No. 1075865                       |
| ·                                      |  | Tax ID: 052-826-402-120.00   |   |   |
| xxxxxxxxx-<br>0003                     | 4815 CTY HWY CR<br>Manitowoc, WI                   | The South Eighty (80) feet of the<br>North Two Hundred Sixty (260)<br>feet of the West Two Hundred<br>Forty-five (245) feet of the   | Dated September 5,<br>2008, recorded on<br>September 12, 2008,<br>in the Office of the  | Dated September 5,<br>2008, recorded on<br>September 12, 2008,<br>in the Office of the  |

| LOAN<br>NUMBER     | PROPERTY<br>STREET<br>ADDRESS        | PROPERTY LEGAL DESCRIPTION   | MORTGAGE   | ASSIGNMENT OF<br>RENTS   |
|--------------------|--------------------------------------|--|--|--|
|                    |                                      | Southwest Quarter (SW ¼) of the Southwest Quarter (SW ¼) of Section Twelve (12), Township Eighteen (18) North, Range Twenty-three (23) East, Town of Newton, Manitowoc County by Deed recorded in Volume 200 of Deeds, page 164.  Tax ID: 014-012-011-014.00   | Register of Deeds for<br>Manitowoc County,<br>Vol. 2402, Page 506,<br>as Document No.<br>1052845   | Register of Deeds for<br>Manitowoc County,<br>Vol. 2402, Page 508,<br>as Document No.<br>1052846   |
| xxxxxxxxx-<br>0002 | 2529 Highway 42,<br>Manitowoc, WI    | Tract Numbered Two (2) of a Certified Survey in the Southeast Quarter (SE ½) of the Southeast Quarter (SE ½) of Section Numbered Thirty-four (34), Township Numbered Nineteen (19) North, Range Numbered Twenty-three (23) East in the Town of Manitowoc Rapids as recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 24 of Certified Survey Maps, page 241, #976984.  Tax ID: 010-034-016-008.01 | Dated March 11,<br>2005, recorded on<br>March 22, 2005, in<br>the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2065, Page 528,<br>as Document No.<br>984700                             | Dated March 11,<br>2005, recorded on<br>March 22, 2005, in<br>the Office of the<br>Register of Deeds for<br>Manitowoc County,<br>Vol. 2065, Page 526,<br>as Document No.<br>984699 |
| xxx5330- R1        | 4101 Viebahn Street<br>Manitowoc, WI | Tract Numbered Five (5) of a Certified Survey in the Northwest Quarter (NW 1/4) of the Northwest Quarter (NW 1/4) of Section Numbered One (1), Township Numbered Eighteen (18) North, Range Numbered Twenty-three (23) East, in the City of Manitowoc, as recorded in the Office of The Register of Deeds for Manitowoc County, Wisconsin in Volume 2 of Certified Survey Maps, page 165, #421510.  Tax ID: 52-801-202-020.00            | Dated April 22, 2009, recorded on April 24, 2009, in the Office of the Register of Deeds for Manitowoc County, Vol. 2456, Page 507, as Document No. 1063484 & Adjustable Rate Rider Vol. 2456, Pages 521 - 523 | N/A  |

- 4. The debts will be assumed to be valid by us unless the debtor, within thirty (30) days after the receipt of this notice, disputes, in writing, the validity of the debts or some portion thereof.
- 5. If the debtor notifies us in writing within thirty (30) days of the receipt of this notice that the debts or any portion thereof is disputed, we will obtain a verification of the debts and a copy of the validation will be mailed to the debtor by us.
- 6. If the creditor named herein is not the original creditor, and if the debtor makes a written request to us within the thirty (30) days from the receipt of this notice, the name and address of the original creditor will be mailed to the debtor by us.

7. Written requests should be addressed to:

Attorney Timothy A. Burkard Michael Best & Friedrich LLP 1000 Maritime Drive Manitowoc, Wisconsin 54220

8. This advice pertains to your dealings with us as a debt collector. It does not affect your dealings with any court, and in particular it does not change the time at which you must answer any Complaint. A Summons is a command from a court, not from us, and you must follow its instructions even if you dispute the validity or amount of the debts. The advice in this notice also does not affect our relations with any court. As lawyers, we may file papers in a suit according to the court's rules and the judge's instructions.

Michael Best & Friedrich LLP is attempting to collect a debt on our client's behalf and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

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