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STATE OF WISCONSIN

MANITOWOC COUNTY

FILED

Bruce G. Schindler 1134A South 10th St. Manitowoc, WI 54220

VS.

Petitioner,

NOV 0 2 2018

CLERK OF CIRCUIT COURT MANITOWOC COUNTY, WI

PETITION/APPLICATION FOR RESTRAINING ORDER

Code: 30704

OTHER INJUNCTION OR RESTRAINING ORDER

Case No.

'18 CV 495

City of Manitowoc Building Inspector City Hall 900 Quay Street Manitowoc, WI 54220-4543

Respondent.

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Date: Time: Served Bv:

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Petitioner, Bruce G. Schindler, petitions/applies to the court for a restraining order against the respondent pursuant to Wis. Stat. 66.0413(1)(c) based on the following:

- 1. Petitioner purchased real estate located at 1325 S. 11th St., Manitowoc, Wisconsin, 54220 on September 10, 2018.
- 2. Respondent issued a Order to Raze or Repair said property on September 24, 2018 which was recorded in the Office of the Register of Deeds for Manitowoc County.
- 3. The Order to Raze or Repair was sent to the prior owner of the property on September 25, 2018.
- 4. Petitioner was never aware of the September 24, 2018 Order to Raze and Repair.
- 5. Respondent then issued another Order to Raze or Repair said property on October 3, 2018, also recorded in the Register of Deeds for Manitowoc County.
- The second Order to Raze or Repair was served on Petitioner on October 3, 2018.
- After Petitioner's purchase of the property on September 10, 2018 but prior to his knowledge of any Order to Raze or Repair, Petitioner put in substantial time and effort to improve the real estate.

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- Petitioner would not have purchased the property had if he was aware of the outstanding Order to Raze and Repair.
- 9. Under the circumstances, it is unreasonable to require this Petitioner to comply with the Order to Raze and Repair dated October 3, 2018.

Petitioner therefore requests the Court:

- 1. Set a date for hearing this Petition/Application within 20 days.
- 2. Issue a restraining order directing respondent to refrain from razing and removing any structure on the property and returning the property to a dust free and erosion free condition.
- 3. Grant the Petitioner a reasonable amount of time to make the building safe, sanitary, and code-compliant with reasonable repairs.
 - 4. Plaintiff receives such other relief as the court deems proper.

Dated: November 2, 2018

Bruce DAchindler
Bruce Schindler

Petitioner

Bruce G. Schindler 1134A South 10th St. Manitowoc, WI 54220

Petitioner.

AMENDED PETITION/APPLICATION FOR RESTRAINING ORDER

Code: 30704 OTHER INJUNCTION OR RESTRAINING ORDER

Case No. 18 CV 495

VS.

City of Manitowoc Building Inspector City Hall 900 Quay Street Manitowoc, WI 54220-4543

Respondent.

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- 1. Petitioner purchased real estate located at 1325 S. 11th St., Manitowoc, Wisconsin, 54220 on September 10, 2018.
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- 3. The Order to Raze or Repair was sent to the prior owner of the property on September 25, 2018.
- 4. Petitioner was never aware of the September 24, 2018 Order to Raze and Repair.
- 5. Respondent then issued another Order to Raze or Repair said property on October 3, 2018, also recorded in the Register of Deeds for Manitowoc County.
- 6. The second Order to Raze or Repair was served on Petitioner on October 3, 2018.
- 7. After Petitioner's purchase of the property on September 10, 2018 but prior to his knowledge of any Order to Raze or Repair, Petitioner put in substantial time and effort to improve the real estate.

- 8. Petitioner would not have purchased the property had if he was aware of the outstanding Order to Raze and Repair.
- 9. Under the circumstances, it is unreasonable to require this Petitioner to comply with the Order to Raze and Repair dated October 3, 2018.

Petitioner therefore requests the Court:

- 1. Set a date for hearing this Petition/Application within 20 days.
- 2. Issue a restraining order directing respondent to refrain from razing and removing any structure on the property and returning the property to a dust free and erosion free condition.
- 3. Grant the Petitioner a reasonable amount of time to make the building safe, sanitary, and code-compliant with reasonable repairs.
 - 4. Plaintiff receives such other relief as the court deems proper.

Dated: November 12, 2018

Bruce Schindler
Bruce Schindler

Petitioner

Bruce Schindler 1134A South 10th St. Manitowoc, WI 54220

NOTICE OF RETAINER

Petitioner,

vs.

Court Case No.18 CV 495

City of Manitowoc Building Inspector City Hall 900 Quay St. Manitowoc, WI 54220-4543

Respondent

TO: Clerk of Circuit Court

Manitowoc County Courthouse

1010 S. 8th St.

Manitowoc, WI 54220

Elizabeth Majerus Assistant City Attorney

900 Quay St.

Manitowoc, WI 54220

We are retained by the Petitioner, Bruce Schindler, in this action, and demand that copies of all future correspondence, pleadings and other material be served on us at our office at 1115 S. 9th St., Manitowoc, WI 54220.

Dated this 12th day of November, 2018.

BURAN LAW OFFICES

Attorney for Peylioner

By: John P. Buran

State Bar No. 1001670

Buran Law Offices 1115 South Ninth Street Manitowoc, WI 54220 Phone: (920) 682-0221 Fax: (920)682-6330 Securiorale, Wil 97230

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