

**STATE OF WISCONSIN
CIRCUIT COURT
MILWAUKEE COUNTY**

**JOHN DOE 1 C/O JEN LAW FIRM,)
APC)**

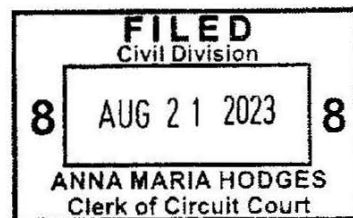
Plaintiff/Creditor,)

v.)

PATRICK TOMLINSON)

Defendant/Debtor.)

Case No. 23-FJ-2



MOTION TO CONTINUE PLAINTIFF'S MOTION FOR CONTEMPT

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Patrick Tomlinson will ask the Court to continue Plaintiff's Motion for Contempt Hearing set for August 24, 2023 until such time as Defendant is able to secure counsel. Please be further advised that Defendant will ask the Court to reset this hearing for remote videoconference, close the proceedings to the public, and further continue this matter until Plaintiff identifies themselves for the record. Due to the quickly approaching August 24, 2023 hearing date, Plaintiff will seek to hear this matter on an emergency basis and will seek relief from the Court as soon as possible.

MOTION

COMES NOW Defendant/Debtor Patrick Tomlinson, Pro Se, and for his Motion To Continue Plaintiff's Motion for Contempt hearing set for August 24, 2023, states as follows:

1. This case involves a years-long harassment campaign waged by the users of Plaintiff's website against the Defendant for no reason other than their own, sadistic entertainment.

2. This harassment of the Defendant and his family has been well documented by both local and national news media.¹
3. Plaintiff's Motion for Contempt was not filed in good faith and is only the latest example of this actionable conduct.
4. The hearing for Plaintiff's Motion for Contempt currently set for August 24, 2023 should be continued. First, it should be continued to allow more time for Defendant to secure counsel. Second, it should be continued and reset for a remote video setting and be closed to members of the public to protect the safety of the litigants and the integrity of the proceedings. Third, it should be continued until such time as Plaintiff has identified himself for the record.

FACTUAL AND PROCEDURAL BACKGROUND

5. Plaintiff John Doe 1 owns and operates a website called new.onaforums.net. The predominant purpose of this website is to provide a forum to harass, defame, threaten, and intentionally inflict distress on Defendant for no reason other than the entertainment of its users.

¹ See:

[The FBI has formed a national database to track and prevent 'swatting' \(nbcnews.com\)](https://www.nbcnews.com/news/us-news/fbi-formed-national-database-track-prevent-swatting-rcna91722)
<https://www.nbcnews.com/news/us-news/fbi-formed-national-database-track-prevent-swatting-rcna91722>

[Supreme Court ruling on online harassment angers victims, advocates - The Washington Post](https://www.washingtonpost.com/technology/2023/06/29/supreme-court-harassment-ruling-first-amendment/)
<https://www.washingtonpost.com/technology/2023/06/29/supreme-court-harassment-ruling-first-amendment/>

[Wisconsin Couple Say They've Been Terrorized by 'Swatting' Campaign | Inside Edition](https://www.insideedition.com/milwaukee-sci-fi-author-patrick-tomlinson-victim-of-years-long-swatting-campaign-of-terror-82365)
<https://www.insideedition.com/milwaukee-sci-fi-author-patrick-tomlinson-victim-of-years-long-swatting-campaign-of-terror-82365>

[Internet Trolls Have Tormented Patrick Tomlinson for Years and He Can't Stop Them \(thedailybeast.com\)](https://www.thedailybeast.com/internet-trolls-have-tormented-patrick-tomlinson-for-years-and-he-cant-stop-them)
<https://www.thedailybeast.com/internet-trolls-have-tormented-patrick-tomlinson-for-years-and-he-cant-stop-them>

6. The harassment of Defendant described herein has all been committed by Plaintiff or users of Plaintiff's website. Some of these users act as agents and/or apparent agents of the Plaintiff and conduct their activities on his behalf
7. Plaintiff and/or his website's users have tormented and terrorized Defendant and his wife daily with online defamation, doxxing of personal identifying information, repeated impersonations, threats, and cyberstalking across multiple social media platforms and websites.
8. Some examples of Plaintiff's and/or website's user's harassment of the Defendant and his wife include, but are not limited to, the following:
 - a. The couple has received literally tens of thousands of harassing, threatening texts from thousands of phone numbers, often a dozen or more every day for five years. They have received dozens of voicemails from anonymous numbers leaving explicit, detailed death threats, rape threats, promises to burn down their home and skin their pets alive.
 - b. The couple's business has been repeatedly struck with masses of fraudulent one-star reviews on sites like Google. Defendant's novels have been deluged with thousands of fraudulent one-star reviews on sites like Goodreads and Amazon which took months to clear out, designed to ruin his ratings and writing career.
 - c. Local businesses the couple are known to frequent have been harassed with phone calls, vulgar faxes, and fraudulent online reviews.

- d. Friends and family of the couple have had their personal information doxxed hundreds of times so they too can be subjected to text, voicemail, and email stalking and harassment.
- e. The couple has been physically stalked and photographed in cities across the country like Washington DC, Detroit, Chicago, Indianapolis, and in multiple locations here in Milwaukee.
- f. While attending conventions in his professional capacity as an author, Defendant or the event organizers have received multiple email threats to assassinate him and trigger a mass shooting event against his audience during presentations.
- g. Plaintiff and/or his website's users have stolen Defendant's identity and social security number to open dozens of fraudulent credit card and loan applications to attack his credit rating.
- h. Plaintiff and/or his website's users have attacked Defendant's WI insurance license by impersonating him to the WI Office of the Commissioner of Insurance and requesting to voluntarily surrender his license, an attack which very nearly cost the couple tens of thousands of dollars of renewal income each year.
- i. Plaintiff and/or his website's users have impersonated the couple to WE Energies trying to get their account canceled and power shut off. They have made false calls of natural gas or carbon monoxide leaks to the Milwaukee Fire Department to get their gas and heat shut off in the dead of winter.

- j. The couple's property and home have been repeatedly trespassed on and vandalized by Plaintiff and/or website's users, who have gone so far as recording and uploading themselves in the act to share among themselves purely for cruel entertainment value.
9. Perhaps most shocking, Plaintiff and/or his website's users have made numerous false calls to the Milwaukee Police Department (SWATting). The couple's home has had false calls made against it to the MPD (SWATting) on 43 separate occasions, the vast bulk of which occurred in the last 13 months. MPD officers have responded to fake calls of shootings and other emergencies at the couple's home dozens of times at all hours.
10. In at least half a dozen of those instances, MPD came charging in guns drawn and pointed at the couple as recently as mid-April. Defendant has been handcuffed and detained on their own front porch by MPD officers falsely told he had killed his wife. Their home has been illegally searched more than a dozen times as a result of these SWATting calls, and their lives have been placed in immediate, serious danger. Defendant's wife is in counseling for the repeated trauma, and both of them exhibit signs and symptoms of CPTSD.
11. Defendant's elderly parents who live in Marquette County have likewise been SWATted on two occasions by the Plaintiff and/or his website's users.
12. There have been six bomb threats made against public venues in three different states by the Plaintiff and/or his website's users while either impersonating the couple, or claiming them to be the targets of the bomb threats. These bomb threat calls include four right here in Milwaukee, two against Hooligan's Super Bar on North Ave, one

against American Family Field hours after the Brewers home opener this season, and last December 10th against the Riverside Theater during a Patti LaBelle concert which necessitated the evacuation of more than two thousand attendees and the closing of several downtown city blocks for several hours. A detective from MPD District 1 visited the couple later that night to inform them the person who made the bomb threat used Defendant's name.

13. Upon information and belief, there are currently active criminal investigations into the Plaintiff and/or his website's users.
14. In an attempt to put a stop to this harassment, Defendants filed a lawsuit in Milwaukee County Court in 2021 against John Doe 1 and other anonymous defendants alleging torts such as intentional infliction of emotional distress, tortious interference, defamation, violations of cyber privacy laws, and civil conspiracy. See Tomlinson v. John Does 1-60, Milwaukee County Court Case No. 2021-CV-500.
15. As the identity of the Plaintiff and his agents and/or apparent agents were unknown at the time, Defendant opened an action in California State Court in an attempt to subpoena Plaintiff's internet service provider to ascertain their true identity.
16. Defendant's suit for service of the subpoena in California was dismissed and Defendant was ordered to Plaintiff's attorneys fees.
17. Defendant believes this decision to be in error and especially disagrees with the decision to award attorneys fees.
18. As detailed below, Defendant has now learned the identity of Plaintiff and has learned that his father is a member of the federal judiciary and may have assisted him in the defense of that action.

19. On January 6, 2023, Plaintiff initiated the instant case by filing a Petition to Register and Docket Foreign Judgment pursuant to Wis. Stat. 806.24.
20. Upon information and belief, no requests to seal or redact any information was presented to the Court along with this filing.
21. Plaintiff, in an effort to gain more information about the Defendant to harass him, sought a supplemental debtors exam which was set for April 19, 2023.
22. Leading up to this exam, the couple faced harassment and threats, including Plaintiff and/or his website's users showing up to the supplemental exam, photographing Defendants from the street, announcing intentions to publicly release any and all private and sensitive financial information about the couple they obtained from the exam so they can continue their psychotic campaign of harassment and humiliation of the couple in the public sphere.
23. As an example of the hundreds of messages Undersigned Defendant received regarding the April 19th, 2023 debtor exam, see below:

<  +18643026974 ✓ ⋮

Wednesday, April 5

You're going to get your
ass metaphorically kicked
at the debtors exam. Jerry
jen will symbolically rape
you over the pinball table
while the commissioner
points and farts in Niki's
vagina laughing

Metaphorically 12:54 PM



Curly Bill Brocius

Don't mind _____, he's just in
a bit of a pickle!

He was served a court summons to
a debit's exam that will occur this
month. He knows the details of his
finances will get leaked, so he's all
riled up.

26



ThomasTrodeoclowm

How likely is would be child killer
Patrick to avoid appearing in the
court? Will Patrick be imprisoned
and will Patrick reveal to the Judge
that OnA ringleader Dan Mullen
photographed his woman like plump
backside?

22

<  +16089060291 ✓ :

Monday, April 17

It's going to be a weird
appointment because
I'll literally be the only
person in the room who
isn't part of the debtors
exam

You won't be late, will
you?

9:40 AM

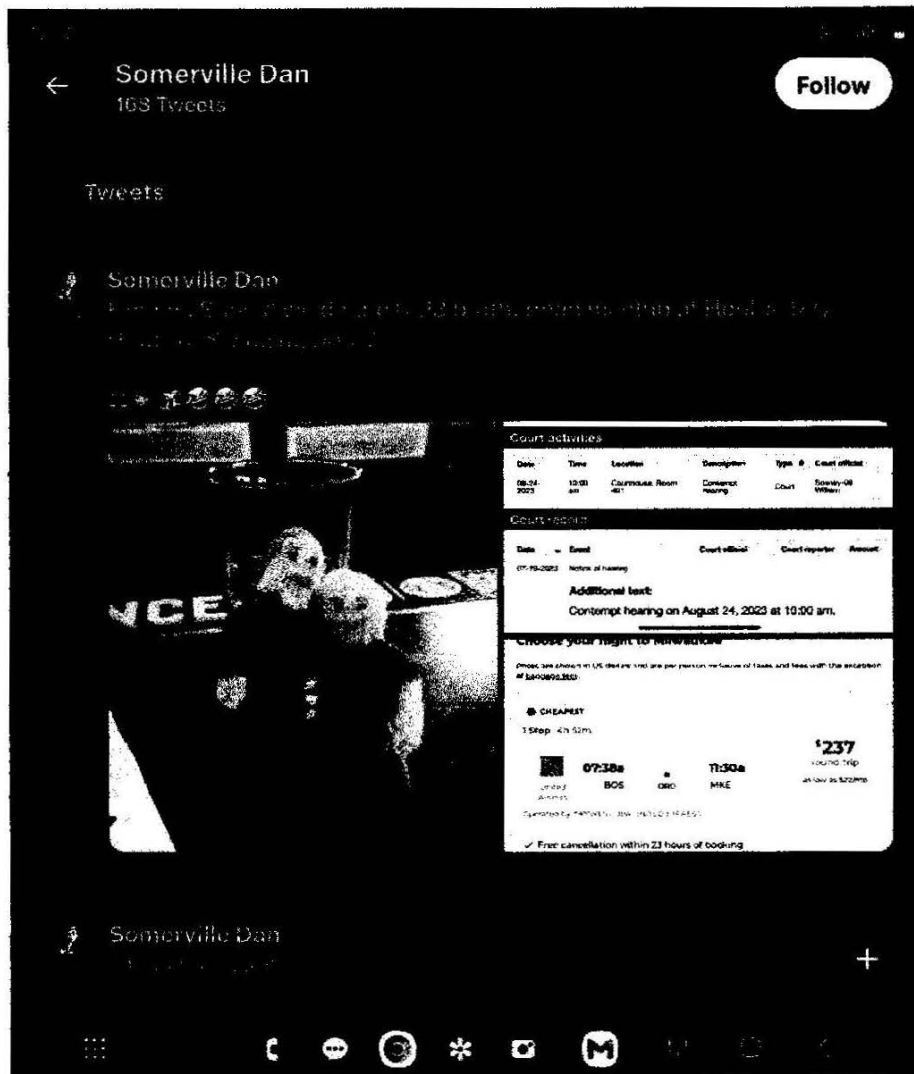
24. Beyond the near guarantee of the release of confidential personal information, the couple have a reasonable and justifiable fear for their physical safety any time their stalkers are able to determine their exact time and location in advance, and the supplemental exam would have put their security in unreasonable danger.
25. For these reasons and others, the couple sought legal counsel from the Milwaukee firm Miller and Miller on how they could avoid it. Upon the advice of counsel, they filed a Chapter 128 debt amortization petition and were told not to attend the exam.
26. Contrary to the assertions made in Plaintiff Doe's Motion for Sanctions, counsel for Plaintiff Doe was advised of this plan and agreed the supplemental exam was therefore unnecessary. Plaintiff Doe's characterization of the events leading to canceling the exam are misleading.

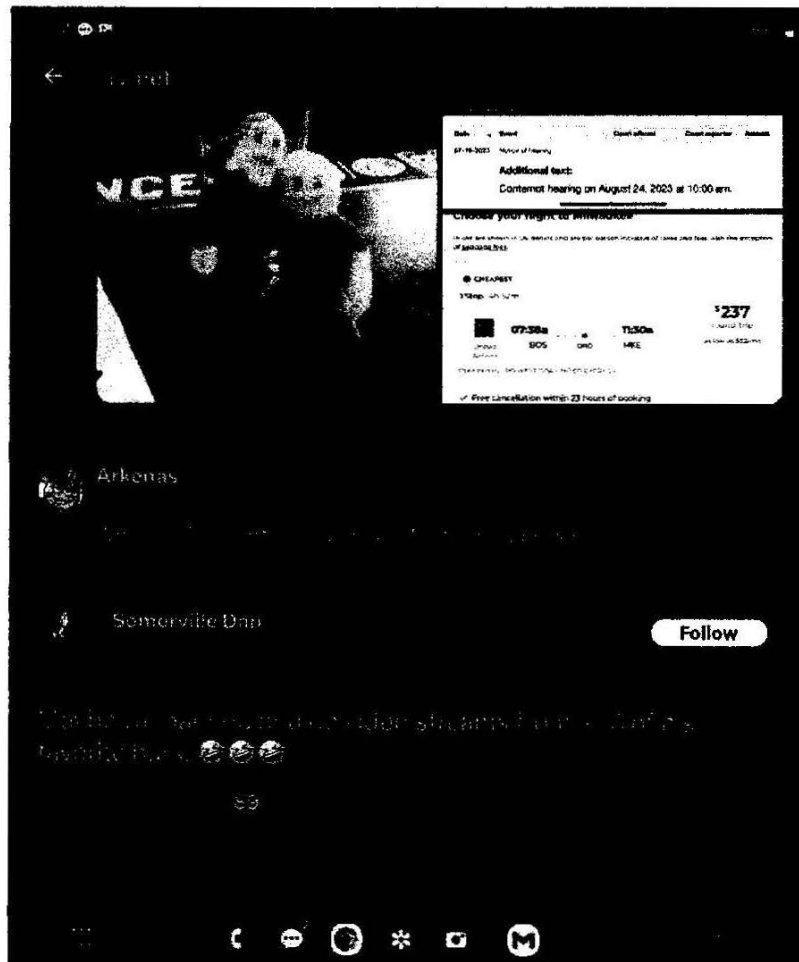
27. After the dismissal of Defendant's debt amortization petition, Plaintiff immediately filed their Motion for Contempt asking for, *inter alia*, a "warrant for [Defendant's] arrest."
28. Plaintiff never attempted to schedule another debtor exam, never attempted to find conditions that would be suitable for Plaintiff to sit for an exam, never asked the Court to compel an additional exam, never asked the Court for sanctions for any conduct, and never made any other effort to collect on this debt or move this matter forward after the amortization petition was dismissed except file this Motion for Contempt.
29. It is clear Plaintiff's Motion for Contempt is not filed in good faith but is instead fodder for Plaintiff and/or his agents and apparent agents to taunt Defendant with the prospect of jail time and threaten his safety at a public hearing.

Threats to the Upcoming August 24, 2023 Hearing

30. Plaintiff and/or his agents or apparent agents have continued this pattern of extreme abuse, harassment, and threats beyond the supplemental exam and into the run up to the August 24, 2023 contempt hearing. These individuals have boasted they've already purchased plane tickets to fly into Milwaukee from across the country so they can harass and intimidate the couple in person from the public gallery of the courtroom, disrupt the proceedings, and even secretly record the hearing as a trophy to be shared with the rest of the users on John Doe 1's stalking website.
31. Below is an example of the messages Defendant has received regarding the upcoming August 24th, 2023 contempt hearing. Again, this is only a tiny fraction of the daily

harassment Defendant receives from the Plaintiff and/or users of his website. See below:





< +14149661372
8:26 PM, Jul 20

(No subject)

Patrick I bet if you didn't show up to your contempt of court hearing on the 24th of August it would totally bum out the people who fly in to watch the hearing live. Honestly it might be worth the arrest warrant to just ignore judge Sosnay. I mean who the fuck is that guy right? Fuck him. What is he the boss of Milwaukee or something? He's not a real tough guy at the end of the day. I've seen guys who would spoon feed me my own teeth and Sosnay (Sos-gay as I like to call him) ain't it.
#DLTIW



< +12017301954

Tuesday, July 25

You're going to jail for
contempt of court,
fatass faggot

No subject
Message size: 10KB
Expires: 11:52 AM, Jul/28 MMS

Couldn't even stop
quaso



MMS 11:52 AM

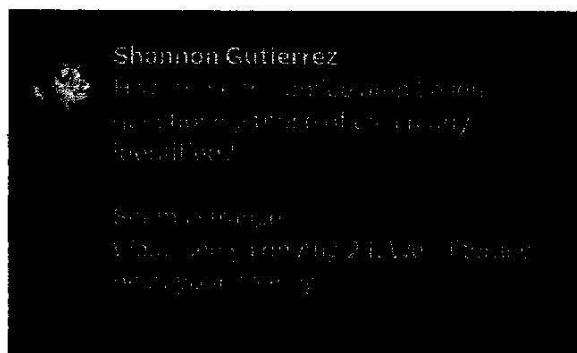
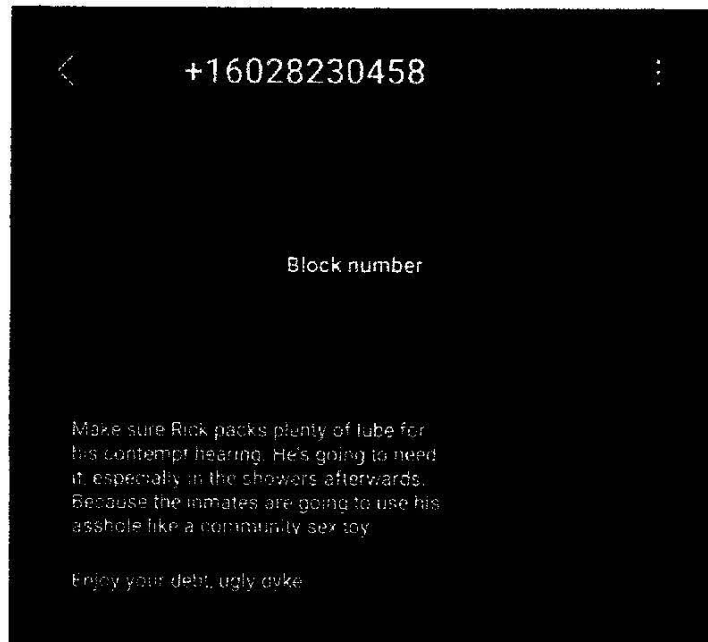
Get fucked, piggie tits!
You won't be able to
Xeet from jail!

Seethe in a 6x6, fat
bitch

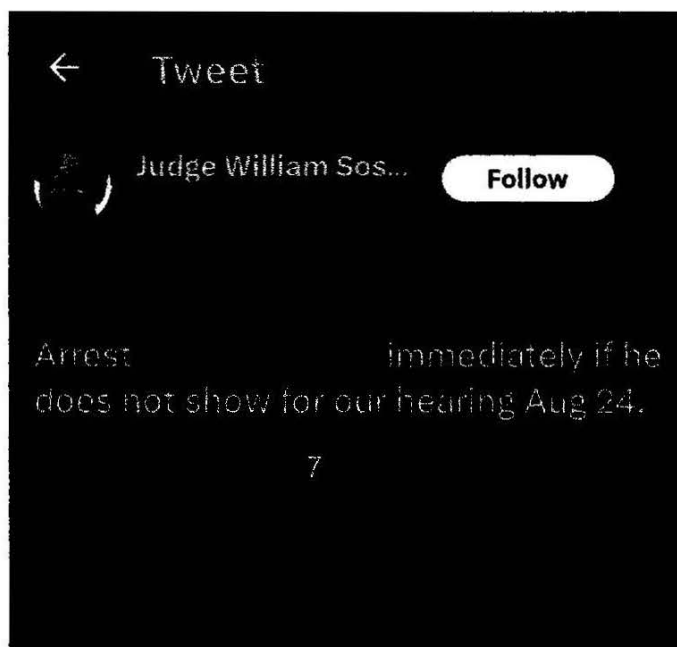
You're going to
fucking jail.

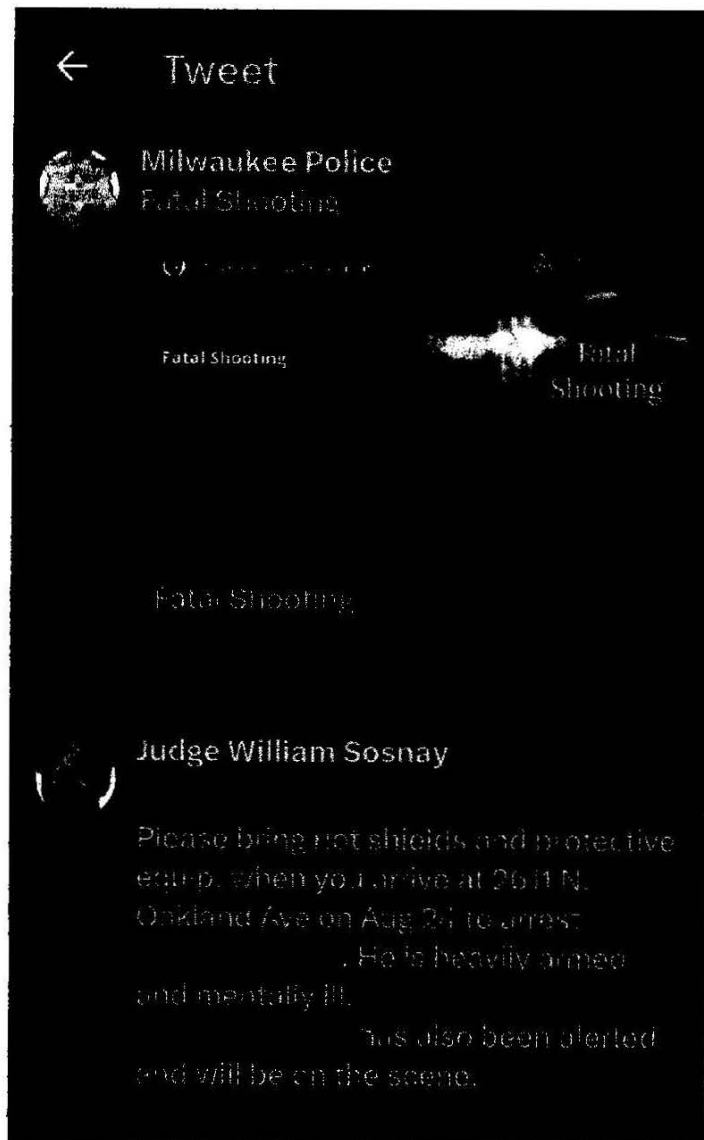
11:53 AM

Enjoy prison, fatass.
It's a comin', son.



32. Furthermore, Plaintiff and/or his website's users have even impersonated the Court in their efforts to harass the Defendant by creating fake social media profiles impersonating His Honor, and going so far as to ask the Milwaukee County Clerk and MPD to use excessive force against the Defendant. See below:





33. These threats are neither idle nor unprecedented. In 2020, Defendant had a court hearing for a traffic ticket and users of Plaintiff's website logged into the hearing and disrupted it with rude noises, obscenities, and shouted insults.

Efforts to Obtain Counsel

34. The Defendant has spent the time since being served notice of this contempt hearing in a good-faith effort to secure local legal representation. Several factors beyond their control have greatly hampered this effort.
35. First, and most importantly, there has been a concern among several firms that they, their employees, or even families could be hit next by Plaintiff and/or his website's users for some of the same abuse and harassment.
36. This fear is justified. Two of the Undersigned Defendant's previous attorneys, Carrie Goldberg and Brinton Resto, have been personally and viciously targeted by Plaintiffs and/or his website's users. These attacks included mass review bombing of Ms. Goldberg's book, online sexual harassment of her employees, and attacks on her recently deceased mother's online memorial page with anti-semitic and pro-Nazi messages. Mr. Resto received multiple phone calls from anonymous people trying to threaten and intimidate him into dropping the couple as clients, and the text and phone harassment of members of his immediate family, including his sister.
37. Second, this case requires a level of complexity and novelty that few attorneys are either capable or interested in taking on. This case involves the collection of an anonymous, foreign judgment based on actions of individuals operating a worldwide troll ecosystem. Few attorneys are interested in this kind of case, even for reasonable compensation.
38. Third, the national level of media exposure and interest the case has generated intimidates some lawyers. The couple's ordeal of being stalked and SWATTeD by John Doe 1 and his agents has garnered both nationally printed and televised reporting from journalists at The Daily Beast, Washington Post, NBC Nightly News,

Inside Edition, and Morning Joe. Several potential local attorneys have expressed in confidence their firms simply aren't equipped or comfortable with such publicity.

39. Fourth, as described below, the identity of John Doe 1 and the apparent involvement of his father in the prosecution of this matter hinders the Defendant's ability to secure counsel.

Identity of John Doe 1

40. In late July, John Doe 1's identity was publicly revealed to be that of John Gibney III.²

41. Gibney is an American citizen formerly of Virginia and Pennsylvania and now currently living abroad in Oman as a biology teacher for an American school located in Muscat.

42. Upon information and belief, Gibney's father is United States District Court Judge John Gibney Jr. of Virginia.

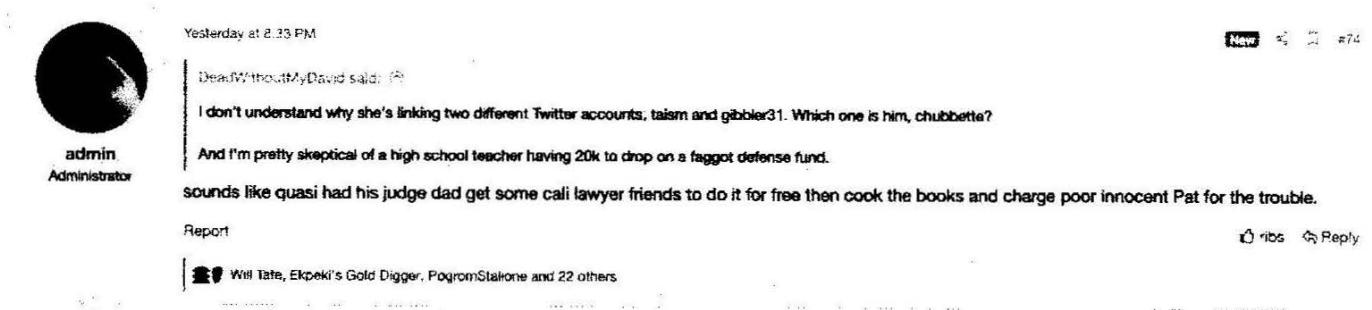
43. Now that Plaintiff's name has been publicized, certain aspects of the procedural history of this case have begun to make more sense.

44. Plaintiff has now made statements implying that his father is assisting him with this matter:

² Gibney's identity was first reported by nationally recognized online threat hunter and anti-harassment advocate Jackie Singh. After the revelation of his identity, Plaintiff has not denied the accusation and has made several comments implying it was true.



45. Indeed, Plaintiff has even implied that his father helped perpetrate a fraud on the California court in the very judgment this case is attempting to collect on. (Note: Quasi is another alias for Gibney, the site administrator.)



46. Due to the nature of this case, Defendant requires an attorney comfortable in litigating complex, multi-jurisdictional litigation. Defendant believes some attorneys might be

interested but don't want to risk angering a federal judge by litigating against a family member.

ANALYSIS

47. Requests for continuances should be granted upon a showing of good cause.

Milwaukee County Local Rule 3.56.

48. Here, plenty of good cause exists to continue the August 24, 2023 hearing and further relief should be provided.

49. First, good cause exists to continue the hearing to allow time for Defendant to find counsel. As shown above, Plaintiff's Motion for Contempt comes after a long line of tortious conduct against the Defendant. Furthermore, because the Plaintiff has asked for the remedial sanction of confinement under Wis. Stat. 785, *et seq.*, due process concerns are raised which further elevates the requirement of counsel.

50. Second, good cause exists for why this matter should be reset for remote, video conference hearing and further it should be closed to the public. Clear threats have been made against the August 24, 2023 hearing and the integrity of the proceedings have been compromised.

51. Third, good cause exists for why this matter should be continued until such time as Plaintiff is identified by name in the case caption. There exists no provision of Wisconsin law that would allow an anonymous Plaintiff to ask the Court to confine a citizen of this state without even identifying themselves to the Court before doing so. Plaintiff should especially not be allowed to do so here when he is attempting to use this anonymity to further harass the Defendant. Furthermore, Plaintiff's identity is no

longer a secret which renders any potential argument he has for continuing to protect his identity as moot.

I. Plaintiff's Motion for Contempt should be continued to allow Defendant more time to secure counsel.

52. Defendant should be afforded the opportunity to secure counsel.

53. When a plaintiff seeks remedial sanctions from the court, due process concerns are raised. See *State v. Pultz*, 206 Wis. 2d 112 (1996.)

54. In *Putz*, the Court found a Plaintiff facing the remedial sanction of confinement must be advised of their right to have counsel appointed if they are indigent. *Id.*

55. While *Putz* related to actions to confine by the State and there is mixed authority regarding whether an indigent litigant is required to have counsel appointed in a private action, it is clear these hearings must be conducted with due process in mind.

56. Here, Defendant is not even going so far as asking the Court to appoint an attorney, he is simply asking for more time to secure one for himself given the complex nature of this case. As such, additional time to secure counsel is reasonable here.

57. Furthermore, several additional factors exist which have frustrated Defendant's attempts to secure counsel.

58. First, the harassment made against previous counsel and almost assured potential for harassment for future counsel has made obtaining representation here much harder. Attorneys do not want to deal with the potential headache of an online troll army harassing their law firm. This is especially true for the type of an attorney needed to handle complex, multi-jurisdictional litigation. Plaintiff should not be allowed to benefit from harassing other litigants and their attorneys by making it harder for Defendant to secure counsel.

59. Second, the recent identification of Plaintiff and his federal judge father has added an additional layer of complexity to these proceedings. Doe 1 was not publicly identified until last month, after the Motion for Contempt was filed. For much of these proceedings, Defendant had mainly sought the assistance of debtor attorneys to attack the California judgment. Recently, it has become clear that Defendant needs to find a general litigator to assist him. Unfortunately, the few attorneys that would want to tackle a complex, multi-jurisdictional legal situation like this also regularly appear in federal court and thus may be hesitant to litigate against a federal judge's son. This is especially true as it appears the Judge is involved in Plaintiff's prosecution of this case.
60. Third, new potential claims and defenses have presented themselves to Defendant since the filing of this Motion for Contempt and the identification of Plaintiff. As stated before, litigation between parties began when Defendant alleged tortious conduct against an unknown Plaintiff. Defendant has never had the opportunity to litigate these claims because his efforts were stopped when he tried to identify the Plaintiff in the California action. Now that Plaintiff is identified, this step is moot and Defendant may proceed against John "Doe" in his own name, John Gibney, and finally hold Gibney responsible for his tortious conduct.
61. Indeed, by enforcing his judgment here, and especially by asking the Court for such relief as he did in his Motion for Contempt, Plaintiff seems to have availed himself of the jurisdiction of this Court. As such, Defendant anticipates new counsel would be filing counterclaims in this action once retained. In addition to the previously alleged

torts against Plaintiff by Defendant, Defendant's Motion for Contempt may be actionable itself as an abuse of process under Wisconsin law.

62. Even if not actionable as its own independent tort, the misrepresentations, complete lack of context presented, and accompanying harassment related to Plaintiff's Motion for Contempt hearing may warrant sanctions under Wis. Stat. 805.02(a) which states that a paper should not be presented for an improper purpose, such as to harass. Here, the primary purpose of Plaintiff's pleadings is to harass Defendant.

63. For these reasons, this Motion to Continue should be granted and Plaintiff's Motion for Contempt hearing set for August 24, 2023 should be continued until such time as Defendant can secure counsel.

II. Plaintiff's Motion for Contempt should be continued and reset for a remote, videoconference hearing and be closed to members of the public.

64. As shown above, direct threats have been made against numerous Court proceedings in this state.

65. More importantly, threats have been made against the upcoming August 24, 2023 hearing.

66. Numerous individuals have made it clear they wish to attend these proceedings in order to harass and intimidate Defendant.

67. There exists no reason why this hearing could not be conducted remotely by video teleconference to prevent the abuse and harassment planned by Plaintiff and/or his website's users.

68. Furthermore, any future proceeding should be closed to members of the public so that they do not become a spectacle for the purpose of further tormenting Defendant.

69. For these reasons, this Motion to Continue should be granted and Plaintiff's Motion for Contempt hearing set for August 24, 2023 should be reset for a time via remote video means and further be closed to members of the public.

III. Plaintiff's Motion for Contempt should be continued until such time as caption is amended to reflect Plaintiff's true identity.

70. Upon information and belief, John Doe is actually John Gibney III and he should be identified as such in the caption of this case and in subsequent court documents.

71. "The ordinary rule in Wisconsin and everywhere is that those availing themselves of the legal system should do so openly." *Doe v. Madison Metropolitan School District*, 2022 W.I. 65 (2002), citing *State ex rel. La Crosse Trib. v. Cir. Ct. for La Crosse Cnty.*, 115 Wis. 2d 220, 241-42, 340 N.W.2d 460 (1983); *Doe v. Village of Deerfield*, 819 F.3d 372, 376-77 (7th Cir. 2016); 67A C.J.S. Parties §§ 173-74 (2022). "In general, a party cannot file a lawsuit in Wisconsin's courts without revealing its identity because the complaint initiating the action must "include the names and addresses of all the parties," *Id.* citing WIS. STAT. § 802.04(1). "Thus, a party seeking redress in our courts generally must reveal its identity to the public." *Id.* citing *Bilder*, 112 Wis. 2d at 557 ("Any use of the judicial process opens information about a party's life to the public's scrutiny.").

72. Furthermore, as detailed above, remedial contempt relief that threatens confinement implicates due process concerns. See *Putz*.

73. Here, Plaintiff is anonymously asking the Court to confine a resident of this state for the purpose of getting laughs from his friends.

74. Even if this rule favoring non-anonymous litigants would somehow not apply here since the case was brought under the name of foreign judgment, Plaintiff's Motion for

Contempt has gone far beyond the purview of the debt collection act and is asking for relief that requires this disclosure.

75. Furthermore, a cornerstone of due process rights is the right to confront your accuser.

If it is a close question of law as to whether an unrepresented party is entitled to an *appointed* lawyer in this type of proceeding, surely it must be clear that a bad actor cannot hide behind a cloak of anonymity to torment litigants.

76. Plaintiff's use of a pseudonym also frustrates Defendant's ability to find a lawyer.

Many attorneys tune out once they hear the words "John Doe" and think the matter is too strange for their practice. If Plaintiff Doe were to be forced to identify himself for the record, that is one less barrier for Undersigned Defendant's ability to find representation.

77. Finally, now that Plaintiff's identification has been made public, many arguments that

Plaintiff could possibly argue in favor of anonymous litigation are moot. He cannot argue that he could potentially be harmed by this disclosure because his identity has already been disclosed.

78. For these reasons, this Motion to Continue should be granted and Plaintiff's Motion

for Contempt hearing set for August 24, 2023 should be continued until such time as the record reflects Plaintiff's true identity.

WHEREFORE, Defendant prays:

A) That this case be reset for a time and date convenient for the Court's calendar, no less than 60 days from the date of entry of this order.

B) That whenever hearing on this matter is set, that it be set for video conference and closed to members of the public.

C) That this hearing be continued until such time as Plaintiff is identified in the case caption.

D) And for such further relief and order as the Court deems appropriate.

Dated: August 21, 2023

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Patrick Tomlinson', written over a horizontal line.

Patrick Tomlinson, Pro Se

This document was prepared with the assistance of a lawyer.

2613 N Oakland Ave

Milwaukee, WI 53211

608-566-9287

patrickstomlinson@gmail.com

Defendant/Debtor