



O'FLAHERTY LAW
Comprehensive. Client-focused. Quality.

FILED
08-23-2023
Anna Maria Hodges
Clerk of Circuit Court
2023FJ000002

August 23, 2023

Via efilng

Hon. William Sosnay
Milwaukee County Circuit Court
901 North 9th Street
Milwaukee, Wisconsin 53233

Re: John Doe 1 c/o Jen Law Firm, APC v. Patrick S. Tomlinson; Milwaukee County Case No. 23FJ2

Dear Judge Sosnay,

O'Flaherty Law was retained to represent Mr. Tomlinson in this matter just before 5:00PM on August 22, 2023. I am aware that this matter is set for hearing on Plaintiff's Motion for Contempt on August 24, 2023 at 10:00AM and I am writing to request that the Court please move the hearing date back thirty (30) days to allow me adequate time to thoughtfully review the issues and case history in order to competently represent the interests of my new client.

I have already begun communicating with counsel of record and plan to continue communicating with counsel regarding any outstanding issues. Although Plaintiff's counsel has voiced his objection to the continuance, the thirty (30) days will not unduly prejudice the proceedings. Because the hearing date is only a day away, I did not want to wait to make my request to the court.

After the thirty (30) days, I am at the Court's disposal for hearing dates and I will also make myself available for a status conference if the Court would like to discuss any potential issues associated with granting a thirty (30) day delay with all parties represented. I thank the Court for its continued courtesies.

Respectfully submitted,

/s/ Meghan McCabe

Attorney at Law