

**MCKINLEY ANCHORAGE &
MOORAGE ASSOCIATION, UA,**

Plaintiff,

Case No. 01-CV-003841

vs.

**MILWAUKEE COUNTY,
F. THOMAS AMENT,
SUSAN L. BALDWIN,
GREGORY YOUNGS,**

Defendants.

PLAINTIFF'S NOTICE OF MOTION & MOTION FOR SUMMARY JUDGMENT

TO: All Defendants
c/o their Attorney, John E. Schapekahn
Principal Asst. Corporation Counsel
Courthouse, Room 303
901 N. 9th Street
Milwaukee, WI 53233

PLEASE TAKE NOTICE that on the 15th day of April, 2002 at 9:30 a.m., Plaintiff McKinley Anchorage & Moorage Association, UA ("MAMA") will appear before the Hon. Michael P. Sullivan in his courtroom at Room 415, Milwaukee County Courthouse, 901 N. 9th Street, Milwaukee Wisconsin and will then and there move the Court for summary judgment pursuant to Sec. 802.08, Stats.

As **GROUND**S for this motion, the Plaintiff submits that the Stipulation of Facts and Brief submitted herewith establish that there are no genuine issues of material fact and that

it is entitled to judgment as matter of law.

Dated this 31st day of January, 2002.

John D. Uelmen
Plaintiff's Attorney
State Bar No. 1003004

1800 E. Capitol Drive, Suite 2G
Milwaukee, WI 53211
(414) 906-1800