

FILED
06-23-2025
Clerk of Circuit Court
Manitowoc County, WI
2025CV000015

STATE OF WISCONSIN
MANITOWOC COUNTY
CIRCUIT COURT

MANITOWOC TIMESHARE
MANAGEMENT, LLC

Plaintiff,

v.

FOX HILLS OWNERS
ASSOCIATION, INC.

Defendant and Third-Party Plaintiff,

v.

FH RESORT
LIMITED PARTNERSHIP

Third-Party Defendant.

Case No. 25 CV 15
Class Code: 30301

**NOTICE OF MOTION AND MOTION FOR INSPECTION OF MEMBERSHIP LIST
AND INJUNCTIVE RELIEF**

TAKE NOTICE that the Third-Party Defendant, FH Resort Limited Partnership, will move the Court for an order granting the following relief:

1. Ordering the Defendant, Fox Hills Owners Association, Inc., to produce a copy of the Association's membership register, as required by Wis. Stat. § 181.1604, and for an award of fees and costs;
2. A preliminary injunction barring the existing board of directors of the Association from engaging in any action or conduct until such time as the Court can determine whether the current board is properly constituted; and
3. An affirmative injunction removing the three individuals who were elected at the April, 2025 annual meeting, appointing FH Resort's 2 developer-designated members, and then either (a)

filling the remaining seat with the individual who received the most votes at the annual meeting,
or (b) requiring a new election to fill the third seat.

This Motion is brought pursuant to Wis. Stat. §§ 181.1604 and 813.02, and is supported by the accompanying brief and affidavits, along with the pleadings and papers on file.

This Motion will be heard on a date and time to be established by the Court.

Dated this 23rd day of June, 2025.

MENN LAW FIRM, LTD.
Attorneys for the Plaintiff

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