



FILED
08-26-2025
Clerk of Circuit Court
Manitowoc County, WI
2025CV000015

KAMAN & CUSIMANO

COMMUNITY ASSOCIATION ATTORNEYS

Matthew Lowe, Esq.
Associate Attorney
mlowe@kamancus.com
(414) 300-6189 Direct

111 E. Kilbourn Ave.
Suite 1700
Milwaukee, WI 53202

August 26, 2025

VIA E-FILING ONLY:

Honorable Judge Robert Dewane
Manitowoc County Circuit Court
1010 S 8th Street
Manitowoc, WI 54220

Re: Manitowoc County Case No. 25CV15

Dear Judge Dewane

This letter is in response to Attorney McKinley's August 22, 2025, letter submitted to the Court. (Dkt. 89). Attorney McKinley made strong accusations that the Association is lying without any attempt to confirm his false suspicions. Similarly, the Association denies the baseless accusation that the Association "intended solely to instigate animosity against FH Resort." This is a simple misunderstanding.

While it is true that Attorney McKinley did not appear on time for the August 21, 2025, hearing it is also true the court emailed the counsel of record at 8:40 am, before the 9:00 am hearing, advising that it would not be making a decision that day on the pending motion. Attorney McKinley's lack of presence until approximately 9:10 am led Cyndi Gierczak, the Association secretary, to believe that attorney McKinley caused the adjournment. This was simply a misunderstanding of the facts on her part. There were no evil motives, as Attorney McKinley attempts to attribute to her. Based on that misunderstanding, Ms. Gierczak sent the update. She did not realize the email from the court was time stamped *before* the hearing until Attorney McKinley sent his letter falsely accusing the Association of instigating animosity.

This case is about the Association correcting the decades of self-dealing between FHR and Manitowoc Timeshare Management company at the Association's unit owners' expense. The owners have suffered substantial financial harm due to this self-dealing and as you can see from their presence in court, are eager to receive updates. This simple misunderstanding won't happen again, and the Association apologizes for it. We are happy to have our client send a simple letter advising the unit owners of the reason for the adjournment on the decision and the error but thought it better to wait for the Court's direction before doing anything.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Matthew Lowe', is centered on the page. The signature is fluid and cursive, with a large initial 'M' and a long horizontal stroke.

Attorney Matthew Lowe