

**FILED**  
**12-09-2021**  
**Clerk of Circuit Court**  
**Manitowoc County, WI**  
**2021CV000469**

STATE OF WISCONSIN  
CIRCUIT COURT  
MANITOWOC COUNTY

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MANITOWOC AREA VISITORS AND  
CONVENTION BUREAU, INC., et al.

Plaintiffs,

v.

CITY OF MANITOWOC, et al.

Defendant.

Case No. 21-CV-469  
Declaratory Judgment – 30701  
Other Injunction or Restraining  
Order – 30704

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**NOTICE OF MOTION AND  
MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

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To: City of Manitowoc  
900 Quay Street  
Manitowoc, WI 54220

PLEASE TAKE NOTICE that pursuant to Wis. Stat. § 813.02, Plaintiffs Manitowoc Area Visitors and Convention Bureau, Inc., The Hearty Olive, LLC and Wisconsin Association of Convention & Visitor Bureaus, Inc. d/b/a Destinations Wisconsin (collectively the "Plaintiffs"), will move the Court for a temporary restraining order and preliminary injunction against the Defendant City of Manitowoc (the "City") from revoking, suspending, or otherwise refusing to renew Plaintiffs Service Agreement, and from spending any room tax revenue pending the outcome of this action.

The motion shall be heard before the Honorable Mark R. Rohrer at a date and time to be determined by the Court at the Manitowoc County Courthouse, Branch 1, 1010 S 8th Street, Manitowoc, WI 54220.

**MOTION**

Plaintiffs, by their undersigned counsel, Reinhart Boerner Van Deuren s.c., move the Court pursuant to Wis. Stat. § 813.02 for temporary restraining order and preliminary injunction preventing the City from revoking, suspending, or otherwise refusing to renew Plaintiffs' Service Agreement, pending the outcome of this action. In support of this motion, Plaintiffs submits the accompanying Brief in Support of Plaintiffs' Motion, the Affidavits of Jason Ring, Rick Couron, Julia Hertel, and Karla Nettleton, and a Proposed Temporary Restraining Order.

Dated this 9<sup>th</sup> day of December, 2021.

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