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DISTRICT I

January 27, 2026

To:

Hon. Marisabel Cabrera
Circuit Court Judge
Electronic Notice

Anna Hodges
Clerk of Circuit Court
Milwaukee County Appeals Processing Division
Electronic Notice

Joseph A. Abruzzo
Electronic Notice

Brenda Alexandra Colina
Electronic Notice

Aman Singh
Electronic Notice

You are hereby notified that the Court has entered the following opinion and order:

2025AP1194 Village of Hales Corners v. Aman Singh (L.C. # 2025FO281)

Before Geenen, J.[1]

Summary disposition orders may not be cited in any court of this state as precedent or authority, except for the limited purposes specified in WIS. STAT. RULE 809.23(3).

Aman Singh, pro se, appeals from an order of the circuit court dismissing his case due to untimeliness and because Singh had already exhausted all possible remedies. Based upon a review of the briefs and the record, we conclude that this case is appropriate for summary disposition. *See* WIS. STAT. RULE 809.21.

[1] This appeal is decided by one judge pursuant to WIS. STAT. § 752.31(2)(b) (2023-24). All references to the Wisconsin Statutes are to the 2023-24 version.

BACKGROUND

On January 12, 2018, Singh received a citation for being in Whitnall Park after hours. Although the citation ordered Singh to appear in the Hales Corners Municipal Court at an appointed time, Singh did not appear. The municipal court entered a default judgment against Singh and he paid the fine.

Four years later, in 2022, Singh filed a motion to reopen the default judgment with the municipal court, arguing that the default judgment was void. The municipal court denied the motion. Singh appealed to the circuit court, which found that the municipal court properly denied Singh's motion to reopen. Singh appealed to this court. Because no appeal lies from a default judgment in a municipal citation case, WIS. STAT. § 800.14(1), our review was limited to the circuit court's rationale for denying the motion to reopen, not Singh's defenses to the underlying citation. ***Village of Hales Corners v. Singh***, No. 2023AP716, unpublished op. and order (Ct. App. Dec. 5, 2023) (***Singh I***).

We affirmed the circuit court. Singh filed a petition for review with the Wisconsin Supreme Court; the petition was denied.

Although no appeal lies from a default judgment, Singh "filed a new motion [to reopen] in the municipal court focusing on defenses to the citation instead of jurisdiction," and argues, again, that the default judgment is void. The municipal court denied the new motion without a hearing, explaining that the case "has already been through the entire appellate process and [his] Motion does not raise any new issues." Singh again appealed to the circuit court, which dismissed Singh's appeal as untimely and because Singh had already exhausted all of his remedies.

Singh again appeals.

DISCUSSION

Singh alleges that the municipal court erroneously exercised its discretion when it denied his motion to reopen without holding an evidentiary hearing.[2]

On appeal, we review the municipal court's decision denying the motion to reopen de novo. ***Village of Williams Bay v. Metzl***, 124 Wis. 2d 356, 361-62, 369 N.W.2d 186 (Ct. App. 1985). The municipal court found that Singh's claims were precluded as a matter of law because he filed a motion to reopen the case to vacate the default judgment that raised defenses to the citation and alleged that the default judgment was void, and that matter was conclusively resolved in the prior appeal in ***Singh I***. Whether preclusion applies is a question of law that this court reviews de novo. *See* ***Northern States Power Co. v. Bugher***, 189 Wis. 2d 541, 551, 525 N.W.2d 723 (1995); ***Wittig v. Hoffart***, 2005 WI App 198, ¶10, 287 Wis. 2d 353, 704 N.W.2d 415; ***State v. Wurtz***, 141 Wis. 2d 795, 799-800, 416 N.W.2d 623 (Ct. App. 1987).[3]

[2] Singh also argues that the circuit court erroneously exercised its discretion when it found that his appeal was untimely, however, we need not address timeliness since we affirm the municipal court on other grounds. *See* ***Barrows v. American Fam. Ins. Co.***, 2014 WI App 11, ¶9, 352 Wis. 2d 436, 842 N.W.2d 508 (2013).

[3] Singh contends that the municipal court was required to conduct a hearing on his motion. We disagree. WIS. STAT. § 800.115(5) permits a municipal court, upon receiving a motion for relief from judgment, to enter an order denying such motion for failure to state grounds upon which relief may be granted. The municipal court concluded that Singh's motion did not raise any claim that allowed him to circumvent the preclusion doctrines, and therefore stated no grounds upon which relief could be granted.

I. Singh's Appeal is Procedurally Barred.

Singh claims in the motion to reopen and vacate the default judgment that relief is warranted "in the interest of justice" because the default judgment is void. However, as the Village notes, this legal issue has been conclusively resolved because this court rejected Singh's arguments and concluded that the default "judgment [was] not void for any of the reasons advanced by Singh" in ***Singh I***. The Village further argues that Singh is not entitled to a second "kick at the cat" because his motion is not based on new facts or issues and alleges no extraordinary circumstances that would justify disturbing the finality of the judgment, so his motion is barred by the prior appeal. We agree with the Village.

Singh correctly notes that "nothing in WIS. STAT. [§] 800.115 limits a defendant to filing just one motion [for relief from a prior municipal court judgment]." This technical reading of the statute, however, ignores the extensive body of case law and preclusion doctrines that do.

Singh's claims were raised and addressed by this court's prior opinion in ***Singh I***. Singh is not entitled to raise those claims again and is bound to our prior decision. Issue preclusion bars the relitigation of an issue of law or fact in a subsequent action when the issue has been actually litigated and decided in a prior action. ***Bugher***, 189 Wis. 2d at 550. While issue preclusion typically applies when the same argument arises in subsequent litigation, Wisconsin courts have applied issue preclusion to bar subsequent proceedings within the same case. ***Precision Erecting, Inc. v. M&I Marshall & Ilsley Bank***, 224 Wis. 2d 288, 304, 592 N.W.2d 5 (Ct. App. 1998).

However, even if issue preclusion did not apply, we agree with the Village's argument that Singh's second motion to reopen and vacate the default judgment is barred by ***Singh I***. We construe the Village's argument as invoking the "law of the case," another preclusion doctrine.[4]

A decision on a legal issue by an appellate court establishes the law of the case, which must be followed in all subsequent proceedings in the trial court or on later appeal. ***Ash Park, LLC v. Alexander & Bishop, Ltd.***, 2014 WI App 87, ¶19, 356 Wis. 2d 249, 853 N.W.2d 618. "Law of the case," a preclusion theory, bars parties from contesting matters they had a full and fair opportunity to litigate, when there is a conclusive adjudication in that matter. ***Arizona v. California***, 460 U.S. 605, 619, 103 S. Ct. 1382 (1983). The same principles and policy considerations that underpin issue and claim preclusion also underpin law of the case. ***Id.***[5]

Preclusion establishes parties' rights, prevents multiple lawsuits and inconsistent decisions arising from a common set of facts, conserves judicial resources, and encourages reliance on adjudication because "after a party has had his day in court, justice, expediency, and the preservation of the public tranquillity requires that the matter be at an end." ***Bugher***, 189 Wis. 2d at 551; ***Kruckenberg v. Harvey***, 2005 WI 43, ¶20, 279 Wis. 2d 520, 694 N.W.2d 879. Therefore, a party may not repeatedly challenge a judgment—in the same case or by another—

[4] Regardless of the Village's arguments, "[a] court may exercise its inherent power to ensure that it functions efficiently and effectively to provide the fair administration of justice, and to control its docket with economy of time and effort." ***State v. Casteel***, 2001 WI App 188, ¶23, 247 Wis. 2d 451, 634 N.W.2d 338 (citation modified). Applying a preclusion doctrine here, like the municipal court did, is appropriate because relitigating whether the default judgment is void, on arguments that could have been made in prior litigation, is contrary to those goals.

[5] Claim preclusion bars parties from relitigating matters which were litigated or could have been litigated in the other proceedings. ***Northern States Power Co. v. Bugher***, 189 Wis. 2d 541, 549-50, 525 N.W.2d 723 (1995).

under different theories, piecemeal; a party cannot bring successive legal challenges arising out of the same set of facts to see if they can find an argument that "sticks."

Applying a procedural bar, here, to prevent serial motions for relief based on facts that were or could have been argued in the first motion is consistent with our policy of holding parties responsible for their deliberate choice of strategy and preventing piecemeal litigation, in furtherance of the interests of finality, fairness, and efficiency, and consistent with this court's opinion in ***Singh I***. *See, e.g.* ***Tietsworth v. Harley-Davidson, Inc.***, 2007 WI 97, ¶51, 303 Wis. 2d 94, 122-23, 735 N.W.2d 418 (noting that a losing litigant is not entitled to another "kick at the cat" inconsistent with a prior appellate decision, or inconsistent with finality and predictability.)

We conclusively determined in ***Singh I*** that the default judgment was not void. Our opinion in that case therefore bars the relitigation of these issues and any other facts or issues Singh could have raised but did not raise in his first motion to reopen, whether under the "law of the case" or another preclusion theory.[6] This result is consistent with the principles underpinning

[6] This result is consistent with forfeiture and waiver principles that apply to motions under Fed. R. Civ. P. 60(b), the federal corollary to WIS. STAT. § 806.07, where the failure to raise all possible known bases for relief in a single motion may waive the opportunity to raise those bases later. *See* ***Nelson v. Taff***, 175 Wis. 2d 178, 187, 499 N.W.2d 685 (Ct. App. 1993) ("For assistance in construction of [§ 806.07], we may refer to federal cases interpreting Rule 60(b)[.]"); ***Swaim v. Moltan Co.***, 73 F.3d 711 (7th Cir. 1996) (holding that when a party utilizes court resources in a motion under Fed. R. Civ. P. 60(b), "we think it just and proper that it be required to put before the district court whatever infirmities support setting aside the default judgment" for, among other reasons, efficiency and finality.); *see also* ***e360 Insight v. The Spamhaus Project***, 500 F.3d 594, 601 (7th Cir. 2007).

preclusion—it avoids repetitive, piecemeal litigation, holds parties accountable for their legal strategies, and serves the interests of finality.[7]

The municipal court's decision denying the motion to reopen is consistent with the controlling law. *See, e.g.*, ***Sutter v. DNR***, 69 Wis. 2d 709, 716, 233 N.W.2d 391 (stating that a lower court has no power to vacate or set aside a judgment once affirmed on appeal); ***State v. Casteel***, 2001 WI App 188, ¶¶23-25, 247 Wis. 2d 451, 634 N.W.2d 338 (explaining that repetitive litigation of the same matters is an abuse of the appellate process, which a court has inherent power to prohibit). We therefore affirm. We further caution Singh that he may face sanctions if he continues to raise claims for relief regarding the municipal citation case underlying this appeal that are procedurally barred. The issues Singh is attempting to raise have been resolved, and the matter has been through the entire appellate process. Accordingly, Singh is on notice that this court is prepared to impose appropriate sanctions should Singh persist in making repetitive allegations, regardless of whether they are packaged as motions, petitions, or appeals. *See* ***id.*** at ¶¶23-27; *see also* WIS. STAT. RULES 809.25(3), 809.83(2).

IT IS ORDERED that the order is summarily affirmed. WIS. STAT. RULE 809.21.

IT IS FURTHER ORDERED that this summary disposition order will not be published.

Samuel A. Christensen
Clerk of Court of Appeals

[7] We additionally note that repetitive appeals are also barred in criminal cases. This court has applied these doctrines to bar issues raised *by Singh* in successive repeat appeals. *See* ***State v. Singh***, Nos. 2015AP2092-CR and 2015AP2093-CR, unpublished slip op., ¶1 (WI App Feb. 14, 2017) (citing ***State v. Escalona Naranjo***, 185 Wis. 2d 168, 185, 517 N.W.2d 157 (1994) to find Singh's claims precluded by two prior appeals in the same underlying matter).