



STATE OF WISCONSIN
DEPARTMENT OF JUSTICE

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CLERK OF SUPREME COURT
OF WISCONSIN

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September 9, 2020

Ms. Sheila T. Reiff
Clerk of Supreme Court
Post Office Box 1688
Madison, WI 53701-1688

Re: *Applegate-Bader Farm, LLC v. Wis. Dep't of Rev., et al.*
Case No. 2018AP1239; District IV

Dear Ms. Reiff:

Enclosed please find nine copies of Defendants-Appellants-Cross-Respondents' Unopposed Motion for Continuance of Argument in the above-referenced matter. A copy is being mailed this date to opposing counsel.

Sincerely,

Anthony D. Russomanno
Assistant Attorney General

ADR:jrs

Enc.

cc w/enc.: Ryan L. Woody

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CLERK OF SUPREME COURT
OF WISCONSINSTATE OF WISCONSIN
IN SUPREME COURT

Case No. 2018AP1239

APPLEGATE-BADER FARM, LLC,

Plaintiff-Respondent-Cross-Appellant-Petitioner,

v.

WISCONSIN DEPARTMENT OF
REVENUE AND RICHARD CHANDLER
IN HIS CAPACITY AS SECRETARY OF
THE DEPARTMENT OF REVENUE,

Defendants-Appellants-Cross-Respondents.

**UNOPPOSED MOTION FOR CONTINUANCE OF
ARGUMENT**

Counsel for the defendants requests a continuance of the argument that this Court has scheduled for October 5, 2020, for the reasons that follow. Counsel for the plaintiff was contacted and does not oppose this request.

1. I am the lead attorney for the defendants and have handled all aspects of the briefing for the court of appeals and supreme court phase. I have been lead attorney on this matter and related matters for several years.
2. This Court has scheduled argument for October 5, 2020.
3. In the last week, I've learned that I have a serious cancer diagnosis that will require immediate treatment beginning the week of September 7. I will be away from work when starting treatments but intend to commence working later in September.

4. My treatment regime includes receiving treatments on October 5, when oral argument is currently scheduled.
5. In light of these circumstances, I am requesting that the argument be continued and be rescheduled to a date in late October or thereafter, as amenable to the Court.
6. I anticipate being unavailable on the following additional dates in the upcoming months:
 - a. October 19
 - b. November 2, 16, and 30
 - c. December 14 and 28
 - d. January 11 and 25, 2021
 - e. February 8 and 22, 2021

I have contacted counsel for the plaintiff, who does not object to this request for a continuance.

Dated this 9th day September 2020.

Respectfully submitted,

JOSHUA L. KAUL
Attorney General of Wisconsin



ANTHONY D. RUSSOMANNO
Assistant Attorney General
State Bar #1076050

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Appellants-Cross-Respondents.

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