

JAMES A. DRILL
ARDELL W. SKOW
LISA M. DRILL*
MATTHEW A. BIEGERT*
MICHAEL J. BROSE*
ANNIE E. BROSE*
KATIE J. BOSWORTH*
MACKENZIE CAMPBELL*
ALLYSON MOORE*
MICHAEL L. DIXON

DOAR, DRILL & SKOW, S.C.
ATTORNEYS AT LAW
103 NORTH KNOWLES AVENUE
P O BOX 388
NEW RICHMOND, WISCONSIN 54017
715-246-2211
FAX 715-246-4405

W.T. DOAR 1882-1952
THOMAS D. BELL 1946-1996
W.T. DOAR JR - 1920-2016

DONALD J. FAST - OF
COUNSEL

RECEIVED

NOV 18 2021

CLERK OF SUPREME COURT
OF WISCONSIN

*ALSO ADMITTED TO MINNESOTA
BAR

FACSIMILE TRANSMISSION COVER SHEET

DATE: 11-18-2021

TRANSMISSION PHONE NUMBER: 608-267-0640

TO: Sheelah Guild

RE: 20AP1943

NUMBER OF PAGES, including this sheet: 5

FROM: Mackenzie Campbell

ADDITIONAL MESSAGE:

Per your attached email - attached on the
signature pages.
Our apologies!

If you have any problems, please call (715) 246-2211.

The documents accompanying this telecopy transmission contain information from Doar, Drill & Skow, S.C., which is confidential and/or privileged. This information is intended to be for the use of the individual or entity named on this transmission sheet. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is prohibited, and may constitute an invasion of the privacy of the intended recipient. If you have received this telecopy in error, please notify us by telephone at (715) 246-2211 (collect) immediately so that we can arrange for the retrieval of the original documents at no cost to you.

Maryjo Klatt

Subject: FW: 20AP1943

Importance: High

RECEIVED

NOV 18 2021

CLERK OF SUPREME COURT
OF WISCONSIN

From: Sheelah Guild <Sheelah.Guild@WICOURTS.GOV>

Sent: Thursday, November 18, 2021 3:02 PM

To: Mackenzie Campbell <MCampbell@doardrill.com>; Michael Brose <MBrose@doardrill.com>; Morgan Richie <mrichie@doardrill.com>

Subject: 20AP1943

Good afternoon,

We have received the hardcopies of the Petition for Review and Appendix for the above-listed matter, but both contain electronic signatures, which are unacceptable as the Supreme Court is not a mandatory e-filing court. Further information about Supreme Court e-filing can be found using this link:

<https://www.wicourts.gov/sc/rulhear/DisplayDocument.pdf?content=pdf&seqNo=378648>

To rectify the matter, I ask that you please fax the following pages to 608-267-0640, ensuring they contain the actual signature of at least one of the attorneys whose names appear on the filing:

- Petition pages 16 and the very last page (2nd half of combined certification)
- Appendix, first page after cover (appendix certification)

Please note that these defects will not impede the timely filing of the petition or appendix. It will be accepted for filing as of today's date.

Best regards,

Sheelah Guild

Deputy Clerk

Supreme Court & Court of Appeals Clerk's Office

Direct line: 608-261-4306

NOV 18 2021

CLERK OF SUPREME COURT
OF WISCONSIN

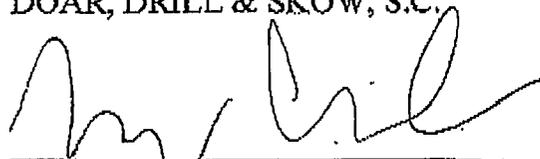
on notice and not rely on strained interpretations of the policy that such conduct is,
as a matter of law, not accidental.

CONCLUSION

The Court of Appeals decision is contrary to established precedent from this Court. Its interpretation leads to a misapplication of issue preclusion and creates new precedent that allows a criminal conviction to preclude a third party from litigating a related civil claim. For the reasons set forth in the Petition, review should be granted.

Dated: November 18, 2021

DOAR, DRILL & SKOW, S.C.



Mackenzie E. Campbell (#1098324)

Michael J. Brose (#1000827)

Morgan A. Richie (#1126928)

P.O. Box 388

New Richmond, WI 54017-0388

mcampbell@doardrill.com

mbrose@doardrill.com

mrichie@doardrill.com

(715) 246-2211

Attorneys for Plaintiff-Appellant-
Cross-Respondent-Petitioner

date. A copy of the certificate has been served with the paper copies of this brief
filed with the court and served on all opposing parties.

RECEIVED

NOV 18 2021

CLERK OF SUPREME COURT
OF WISCONSIN

Dated: November 18, 2021

DOAR, DRILL & SKOW, S.C.



Mackenzie E. Campbell (#1098324)

Michael J. Brose (#1000827)

Morgan A. Richie (#1126928)

P.O. Box 388

New Richmond, WI 54017-0388

mcampbell@doardrill.com

mbrose@doardrill.com

mrichie@doardrill.com

(715) 246-2211

Attorneys for Plaintiff-Appellant-
Cross-Respondent-Petitioner

RECEIVED

NOV 18 2021

CLERK OF SUPREME COURT
OF WISCONSIN

CERTIFICATIONS

I hereby certify that filed with this brief, either as a separate document or as a part of this brief, is an appendix that complies with Wis. Stat. § 809.19(2)(a) and that contains at a minimum: (1) a table of contents; (2) relevant circuit court entries; (3) the findings or opinion of the circuit court; and portions of the record essential to an understanding of the issues raised, including oral or written rulings or decisions showing the circuit court's reasoning regarding those issues.

I further certify that if the record is required by law to be confidential, the portions or the record included in the appendix are reproduced using first names and last initials instead of full names of persons, specifically including juveniles and parents of juveniles, with a notation that the portions of the record have been so reproduced to preserve confidentiality and with appropriate references to the record.

Dated: November 18, 2021

DOAR, DRILL & SKOW, S.C.


Mackenzie E. Campbell (#1098324)

Michael J. Brose (#1000827)

Morgan A. Richie (#1126928)

P.O. Box 388

New Richmond, WI 54017-0388

mcampbell@doardrill.com

mbrose@doardrill.com

mrichie@doardrill.com

(715) 246-2211

Attorneys for Plaintiff-Appellant-Cross-
Respondent-Petitioner