

FILED
09-24-2024
Door County
Clerk of Circuit Court
2024CV000119

STATE OF WISCONSIN CIRCUIT COURT DOOR COUNTY

HUNTER and JESSICA CLINTON, JOHN and
ERIN WILSON, NICK and TARA FROEMMING,
and MARK and CALEY SWANSON

Plaintiffs,

v.

VILLAGE OF SISTER BAY and JULIE
SCHMELZER, as Village Administrator for the
Village of Sister Bay

Defendants.

Declaratory Judgment
Case Code: 30701
Case No. 24-CV-119

PLAINTIFFS' MOTION FOR TEMPORARY INJUNCTION

Plaintiffs Hunter and Jessica Clinton, John and Erin Wilson, Nick and Tara Froemming, and Mark and Caley Swanson, by their undersigned attorneys at the Wisconsin Institute for Law & Liberty, pursuant to Wis. Stat. § 813.02, move for a temporary injunction prohibiting Defendants from enforcing the Village of Sister Bay's 4-bedroom limit or any other limit on where guests sleep within the home against the Plaintiffs while this case proceeds.

The grounds for this Motion are set forth in the Plaintiffs' complaint and exhibits, memorandum in support of this motion, and supporting declarations, all of which are incorporated herein. The actions to be restrained place the Plaintiffs at significant risk of irreparable harm for which they will have no adequate remedy at law. Plaintiffs are likely to prevail on the merits of their claims, and issuance of the

temporary relief requested is necessary to preserve the status quo and prevent irreparable harm.

This motion will be heard at a date and time to be set by the Court.

Dated: September 24, 2024

Respectfully Submitted,

WISCONSIN INSTITUTE FOR LAW & LIBERTY

Electronically signed by Luke N. Berg

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