

NOTICE OF MOTION AND MOTION FOR DEFAULT

STATE OF MINNESOTA
COUNTY OF MORRISON
DISTRICT COURT
SEVENTH JUDICIAL DISTRICT
CASE TYPE: DWC
COURT FILE NO. 49-FA-24-970

In Re the Marriage of:
TONYA CRYSTAL RINNELS,
Petitioner,
and
MICHAEL NEAL RINNELS,
Respondent.

TO: Micheal Neal Rinnels

NOTICE OF MOTION

PLEASE TAKE NOTICE that a hearing will be held on October 23, 2024, at 11 a.m., before the Honorable Leonard A. Weiler, at the Morrison County District Court, 213 1st Avenue Southeast, Little Falls, MN 56345. At that hearing, Petitioner will make the following:

MOTION

1. Ordering this matter proceed by default to dissolve the parties' marriage.

2. For any further relief that the court finds just and equitable.

The Court may grant any or all of the above relief even if you are not present.

Acknowledgment:

1. I am not serving or filing this document for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

2. The claims, defenses, and other legal contentions therein are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law.

3. The allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

4. The denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on a lack of information or belief.

Dated: July 24, 2024

HOFFMAN LAW, PLLC

/s/ Karen Hoffman

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