

# 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 1<sup>st</sup> 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**

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