

**STATE OF WISCONSIN****CIRCUIT COURT****MILWAUKEE**Milwaukee Regional Medical Center Thermal Service, Inc.  
vs. City of Wauwatosa**Electronic Filing  
Notice**Case No. 2025CV010755  
Class Code: Money Judgment

FILED

12-17-2025

Anna Maria Hodges

Clerk of Circuit Court

2025CV010755

Honorable Cynthia M.  
Davis-21

Branch 21

CITY OF WAUWATOSA  
7725 W. NORTH AVENUE  
WAUWATOSA WI 53213

Received by

DEC 18 2025

City Clerk's Office

12-18-25

19:15  
Carol Mumb

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Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Registration is available to attorneys, self-represented individuals, and filing agents who are authorized under Wis. Stat. 799.06(2). A user must register as an individual, not as a law firm, agency, corporation, or other group. Non-attorney individuals representing the interests of a business, such as garnishees, must file by traditional means or through an attorney or filing agent. More information about who may participate in electronic filing is found on the court website.

If you have questions regarding this notice, please contact the Clerk of Circuit Court at 414-278-4140.

Milwaukee County Circuit Court  
Date: December 17, 2025

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12-17-2025  
Anna Maria Hodges  
Clerk of Circuit Court  
2025CV010755  
Honorable Cynthia M.  
Davis-21  
Branch 21

STATE OF WISCONSIN  
MILWAUKEE COUNTY

CIRCUIT COURT

**MILWAUKEE REGIONAL MEDICAL CENTER  
THERMAL SERVICE, INC.,**

a Wisconsin non-profit, non-stock corporation,  
8700 Watertown Plank Road  
Wauwatosa, WI 53226,

*For Official Use:*

Plaintiff,

Case No.

vs.

Classification:  
30301 – Money Judgment

**CITY OF WAUWATOSA,**  
a Wisconsin municipal corporation,  
7725 W. North Avenue  
Wauwatosa, WI 53213,

Defendant.

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**SUMMONS**

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THE STATE OF WISCONSIN, To each person named above as a defendant:

You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within twenty (20) days of receiving this Summons, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the Court, whose address is Milwaukee County Courthouse, 901 N. 9<sup>th</sup> Street, Milwaukee, Wisconsin 53233, and to Joseph A. Pickart, Smitha Chintamaneni, Anthony Anzelmo, and Amy Ambro of Husch Blackwell LLP, Plaintiff's attorneys, whose address is 511

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STATE OF WISCONSIN  
MILWAUKEE COUNTY

CIRCUIT COURT

**MILWAUKEE REGIONAL MEDICAL CENTER  
THERMAL SERVICE, INC.,**

a Wisconsin non-profit, non-stock corporation,  
8700 Watertown Plank Road  
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*For Official Use:*

Plaintiff,

vs.

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Defendant.

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**COMPLAINT**

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Plaintiff, Milwaukee Regional Medical Center Thermal Service, Inc. (“MRMC Thermal”),  
by and through its attorneys, Husch Blackwell LLP, states and alleges its Complaint against  
Defendant, City of Wauwatosa (the “City”) as follows:

**INTRODUCTION**

1. This is an action filed pursuant to Wis. Stat. § 74.37(3)(d) for a refund of excessive  
real estate property taxes to be imposed upon and paid by MRMC Thermal for the 2025 tax year,  
plus statutory interest, with respect to a parcel of real property in the City (the “Property”). The  
assessment of the Property exceeded its fair market value in violation of Wis. Stat. § 70.32 and,  
therefore, such assessment was excessive.

**PARTIES**

2. Plaintiff is a Wisconsin non-profit, non-stock corporation, with its principal place of  
business located at 8700 Watertown Plank Road, Wauwatosa, Wisconsin 53226.



18. MRMC Thermal timely submitted a Request for Waiver of Board of Review Hearing (“Waiver Request”), which resulted in the Board of Review approving the Waiver Request on October 21, 2025.

19. MRMC Thermal was advised of the City’s Board of Review granting the Waiver Request on October 21, 2025 which, pursuant to Wis. Stat. § 70.47(8m) requires this action to be commenced at this time, within 60 days of notice of the Board of Review’s grant of MRMC Thermal’s Waiver Request.

20. Based on the City’s 2025 Assessment, in the amount of \$205,000,000, and in accordance with the City’s 2025 tax bill, the City has imposed property tax in the amount of \$3,648,708.55.

21. MRMC Thermal has complied with all statutory requirements under its control for objecting to the 2025 Assessment under Wis. Stats. §§ 70.47 and 74.37.

#### **CLAIM FOR RELIEF**

22. All of the foregoing paragraphs are incorporated as if fully re-alleged.

23. To the extent the Property is determined to be taxable (in whole or in part), the 2025 Assessment is improper in that it is in excess of the Property’s fair market value, contains property which is not subject to taxation, and/or or is otherwise exempt as fully described, *supra*, and as incorporated herein.

24. When excluding non-taxable personal property and exempt machinery and equipment, the Property should be assessed as of January 1, 2025 no higher than \$12,000,000.

25. As a result, the 2025 Assessment is excessive by at least \$193,000,000.

26. Therefore, applying the City’s 2025 tax rate of \$17.798954per \$1,000 of assessed value, as described in paragraph 13, the correct property tax for the Property for 2025 should not

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