

**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

12-18-25

10:15 AM  
Carl MumbCITY OF WAUWATOSA  
7725 W. NORTH AVENUE  
WAUWATOSA WI 53213*Received by**DEC 18 2025**City Clerk's Office*

Case number 2025CV010755 was electronically filed with/converted by the Milwaukee County Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases.

Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. Electronic parties are responsible for serving non-electronic parties by traditional means.

You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a fee to register as an electronic party. This fee may be waived if you file a Petition for Waiver of Fees and Costs Affidavit of Indigency (CV-410A) and the court finds you are indigent under §814.29, Wisconsin Statutes.

If you are not represented by an attorney and would like to register an electronic party, you will need to enter the following code on the eFiling website while opting in as an electronic party.

**Pro Se opt-in code: d0e636**

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 garnissees, 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

FILED

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,

vs.

Case No.

**CITY OF WAUWATOSA,**  
a Wisconsin municipal corporation,  
7725 W. North Avenue  
Wauwatosa, WI 53213,Classification:  
30301 – Money Judgment

Defendant.

---

**SUMMONS**

---

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

FILED

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,

vs.

Case No.

**CITY OF WAUWATOSA,**  
a Wisconsin municipal corporation,  
7725 W. North Avenue  
Wauwatosa, WI 53213,Classification:  
30301 – Money Judgment

Defendant.

**COMPLAINT**

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 \$17.798954 per \$1,000 of assessed value, as described in paragraph 13, the correct property tax for the Property for 2025 should not

P.O. ADDRESS:

511 North Broadway, Suite 1100

Milwaukee, Wisconsin 53202

414.273.2100

414.223.5000 (fax)

[Joseph.Pickart@huschblackwell.com](mailto:Joseph.Pickart@huschblackwell.com)

[Smitha.Chintamaneni@huschblackwell.com](mailto:Smitha.Chintamaneni@huschblackwell.com)

[Anthony.Anzelmo@huschblackwell.com](mailto:Anthony.Anzelmo@huschblackwell.com)

[Amy.Ambro@huschblackwell.com](mailto:Amy.Ambro@huschblackwell.com)