

**STATE OF WISCONSIN****CIRCUIT COURT****MILWAUKEE**Milwaukee Regional Medical Center Thermal Service, Inc.  
vs. City of Wauwatosa**Electronic Filing  
Notice**Case No. 2026CV003813  
Class Code: Money JudgmentCITY OF WAUWATOSA  
7725 W. NORTH AVENUE  
WAUWATOSA WI 53213

Received by

APR 24 2026

City Clerk's Office

FILED

04-23-2026

Anna Maria Hodges

Clerk of Circuit Court

2026CV003813

Honorable Paul R Van

Grunsven-09

Branch 09

4-24-26  
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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.

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

Milwaukee County Circuit Court  
Date: April 23, 2026

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04-23-2026  
Anna Maria Hodges  
Clerk of Circuit Court  
2026CV003813  
Honorable Paul R Van  
Grunsven-09  
Branch 09

STATE OF WISCONSIN  
MILWAUKEE COUNTY

CIRCUIT COURT

**MILWAUKEE REGIONAL MEDICAL CENTER  
THERMAL SERVICE, INC.,**  
a Wisconsin non-profit, non-stock corporation,  
8700 W. 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.

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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

North Broadway Street, Suite 1100, Milwaukee, Wisconsin 53202. You may have an attorney help or represent you.

If you do not provide a proper answer within twenty (20) days, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 23rd day of April, 2026.

HUSCH BLACKWELL LLP  
Attorneys for Plaintiff  
Milwaukee Regional Medical Center  
Thermal Service, Inc.

By: /s/ *Smitha Chintamaneni*

Joseph A. Pickart, 1001477  
Smitha Chintamaneni, 1047047  
Anthony J. Anzelmo, 1059455  
Amy Ambro, 1116822

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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. § 74.35 to recover that amount of the general property tax imposed upon MRMC Thermal for the 2025 tax year because the City’s January 1, 2025 property assessment was unlawful (i.e., subjected to tax property which is exempt).

**PARTIES**

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

3. Defendant is a Wisconsin municipal corporation with its principal place of business located at 7725 West North Avenue, Wauwatosa, Wisconsin 53213.

### **VENUE AND JURISDICTION**

4. This Court has jurisdiction over the subject matter of this dispute pursuant to Article VII, Section 8 of the Wisconsin Constitution, which provides for subject matter jurisdiction over all civil matters within this state.

5. The City is subject to this Court's jurisdiction pursuant to Wis. Stat. § 801.05, including – *inter alia* – subparts (1) and (6).

6. Venue is proper in Milwaukee County pursuant to Wis. Stat. § 801.50(2)(a) and (b) because it is the county where the claim arose and where the property is situated.

### **FACTS**

7. At all relevant times, MRMC Thermal owned the property located in the City at 9250 Watertown Plank Road, Tax Key No. 373-9999-027 (the "Property").

8. MRMC Thermal is exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code.

9. MRMC Thermal was created for the sole purpose of providing reliable utility support to non-profit organizations. It provides steam and chilled water solely to non-profit entities exempt from federal income tax and located entirely on the Milwaukee Regional Medical Center Campus (*e.g.*, Froedtert Memorial Lutheran Hospital, Children's Hospital of Wisconsin, Inc., The Medical College of Wisconsin, Versiti Blood Research Institute, and Kathy's House). MRMC Thermal's existence and creation were solely intended to provide reliable utility support to these non-profit organizations.

10. MRMC Thermal does not provide steam and chilled water to for-profit entities.

(ii) interest on the unlawful tax paid pursuant to Wis. Stat. § 74.35(4); and (iii) costs and attorneys' fees allowed by law; and

E. Grant any and all other relief that the Court deems just and equitable.

Dated this 23rd day of April, 2026.

HUSCH BLACKWELL LLP  
Attorneys for Plaintiff  
Milwaukee Regional Medical Center  
Thermal Service, Inc.

By: /s/ *Smitha Chintamaneni*

Joseph A. Pickart, 1001477  
Smitha Chintamaneni, 1047047  
Anthony J. Anzelmo, 1059455  
Amy Ambro, 1116822

**P.O. ADDRESS:**

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