

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Paul Wikstrom,

CASE NO.: 62-CV-24-7378

Contestant,

v.

**CONTESTEE'S NOTICE OF MOTION
AND MOTION FOR DEFAULT
JUDGMENT**

Curtis Johnson,

Contestee.

TO: Contestee Curtis Johnson and his counsel Charlie Nauen, David Zoll, and Rachel Kitze Collins 100 Washington Avenue South, Suite 2200, Minneapolis, Minnesota 55401.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on December 3, 2024 at 11:00 a.m. via Zoom, Contestant Paul Wikstrom will move the Court for entry of an order as set forth below.

MOTION

Pursuant to Minnesota Rule of Civil Procedure 55.01, Contestant Paul Wikstrom ("Contestant") respectfully moves the Court for an Order finding Contestee Curtis Johnson ("Contestee") in default and enter judgment in favor of Contestant on all counts in the Notice of Election Contest ("Notice").

In the alternative, because Contestee failed to address Count 2, violations of Minnesota Statute 204B.06 Subd. 1(3) either in an Answer or in his Motion to Dismiss, Contestant respectfully moves for this Court for an Order waiving opposition to Contestant's claims and entering Judgment in favor of Contestant on Count 2.

This Motion is based upon the Memorandum of Law and Affidavit filed herewith, and all the other files, records, and proceedings in this matter.

Dated: 12/02/2024

HUSCH BLACKWELL, LLP

s/ Nicholas R. Morgan

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s/ Erick G. Kaardal

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