	T COURT MILWAUKEE COUNTY
IN THE INTEREST OF	Court Case No.:
A Person/Persons under the Age of Eighteen	NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT

For Official Use

The Petitioner, by Assistant District Attorney hereby moves the Court for partial summary
judgment pursuant to Wis. Stat. § 802.08. The Petition for Termination of Parental Rights alleges that grounds
exist to terminate the parental rights of [the parent's name] pursuant to Wis. Stat. § 48.415(4). No genuine
issue of material fact exists as to the elements that petitioner must prove to establish grounds pursuant to Wis.
Stat. § 48.415(4), and petitioner is entitled to judgment as matter of law. On, the Honorable
entered a CHIPS order regarding the above-named child(ren), pursuant to Wis. Stat. §
, that suspended [the parent's] visits with the child(ren). The CHIPS order contained written warnings
as required by Wis. Stat. § 48.356(2). The CHIPS order has remained in effect for over one year and has not
been modified to permit visitation between [the parent] and the above-named child(ren). Further basis for this
motion is contained in the accompanying affidavit of [the Assistant District Attorney]. The Petitioner respectfully
requests that the Court schedule a hearing on this motion as soon as it may be heard

CIRCUIT COURT CHILDREN'S DIVISION

MILWAUKEE COUNTY

IN THE IN	NTEREST OF:	Court Case No.:
A Person((s) Under the Age of Eighteen	
	AFFIDAVIT IN SUPPORT OF MOTION	FOR PARTIAL SUMMARY JUDGMENT
COUNTY	OF MILWAUKEE)) SS.	
STATE O	F WISCONSIN), being first duly sworn under	oath, deposes and states as follows:
1.	Your affiant is a Milwaukee County Dist in support of Petitioner's Motion for Part	rict Assistant District Attorney and makes this affidavit
2.	Attached as Exhibit A is a certified copy above-named children entered by the H	of the CHIPS order regarding the donorable on .
3.	The certified court order attached heretoground of continuing denial of visitation, of material fact exists as to the authentic	o as Exhibit A establishes the factual basis for the pursuant to Wis. Stat. § 48.415(4). No genuine issue city or applicability of the certified court order. atter of law that grounds exist to terminate [the
Dated	d at Wauwatosa, Wisconsin this day of	July, 2022. Assistant District Attorney
Subscribe	ed and sworn before me in Wauwatosa, Wi	State Bar #: isconsin, on July ,2022.
Notary Pu	ublic	
My comm	nission expires	

STATE OF WISCONSIN CIRCUIT CHILDREN'S		
IN THE INTEREST OF	Court Case No.:	
A Person/Persons under the Age of Eighteen	NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT	For Official Use

The Petitioner, by Assistant District Attorney _______, hereby moves the Court for partial summary judgment pursuant to Wis. Stat. § 802.08. The Petition for Termination of Parental Rights alleges that grounds exist to terminate the parental rights of [the parent] pursuant to Wis. Stat. § 48.415(10). No genuine issue of material fact exists as to the elements that petitioner must prove to establish grounds pursuant to Wis. Stat. § 48.415(10), and Petitioner is entitled to judgment as matter of law.

Within the three year period prior to the finding that the above-named child was in need of protection or services pursuant to Wis. Stat. § 48.13(), [the parent's] parental rights to another child were involuntarily terminated. Further basis for this motion is contained in the accompanying affidavit of ADA. The Petitioner respectfully requests that the Court schedule a hearing on this motion as soon as it may be heard.

CIRCUIT COURT CHILDREN'S DIVISION

MILWAUKEE COUNTY

IN THE I	NTEREST OF: Court Case No.:				
A Persor	n(s) Under the Age of Eighteen				
AFFI	AFFIDAVIT OF ADA IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT				
	Y OF MILWAUKEE)) SS. DF WISCONSIN)				
	, being first duly sworn under oath, deposes and states as follows:				
1.	Your affiant is a Milwaukee County Assistant District Attorney and makes this affidavit in support of Petitioner's Motion for Partial Summary Judgment.				
2.	Attached as Exhibit A is a certified copy of the CHIPS dispositional order regarding the above-named child that was signed on . [The child] was found to be a child in need of protection or services pursuant to Wis. Stat. § 48.13().				
3.	Attached as Exhibit B is a certified copy of the order terminating the parental rights of [the parent] to (d.o.b.) and entered by the Honorable , Milwaukee County Circuit Court Judge, on .				
4.	The certified court orders attached hereto as Exhibits A and B establish the factual basis for the ground of prior involuntary termination of parental rights, pursuant to Wis. Stat. § 48.415(10). No genuine issue of material fact exists as to the authenticity or of these certified court orders. Petitioner is entitled to judgment as a matter of law that grounds exist to terminate [the parent's] parental rights to [the child].				
Date	d at Wauwatosa, Wisconsin this day of July 2022.				
	Assistant District Attorney State Bar #				
Subscrib	ed and sworn before me in Wauwatosa, Wisconsin, on July , 2022.				
Notary P	ublic				
My comr	nission expires				