



Regi Bachochin, County Clerk

Serve Documents

Type: Individual
 Individual to be Served: Regi Bachochin, County Clerk
 Serve Speed: Standard
 Matter Number/Name: Huber
 Court:
 Case Number:
 Plaintiff(s):
 Client Details / Special Instructions: Please provide a proof of service affidavit for this - thank you!
 Social Media:
 Addresses:
 Work - Kenosha County, 1010 56th St, Kenosha, WI 53140
 Physical Description:
 No physical description provided

Attempt Log

Date	Description

DEC - 7 2020

Tin Hk 12/8⁷/20
 1:36pm

Wisconsin Serve Rules

Who May Serve. An authenticated copy of the summons may be served by any adult resident of the state where service is made who is not a party to the action. Service shall be made with reasonable diligence.

Endorsement. At the time of service, the person who serves a copy of the summons shall sign the summons and shall indicate thereon the time and date, place and manner of service and upon whom service was made. If the server is a sheriff ... the server's official title shall be stated. Failure to make the endorsement shall not invalidate a service but the server shall not collect fees for the service.

Personal Service, Individual. By personally serving the summons upon the defendant either within or without this state.

Substituted. If with reasonable diligence the defendant cannot be served under (a), then by leaving a copy of the summons at the defendant's usual place of abode:

1. In the presence of some competent member of the family at least 14 years of age, who shall be informed of the contents thereof; [or] In the presence of a competent adult, currently residing in the abode of the defendant, who shall be informed of the contents of the summons; or
2. Pursuant to the law for substituted service of summons or like process upon defendants in actions brought in courts of general jurisdiction of the state in which service is made.

Corporations. By personally serving the summons upon an officer, director or managing agent of the corporation ... either within or without this state. In lieu of delivering the copy of the summons to the officer specified, the copy may be left in the office of such officer, director or managing agent with the person who is apparently in charge of the office.

Return of Service. The person making service shall make and deliver proof of service to the person on whose behalf service was made who shall promptly file such proof of service. Failure to make, deliver, or file proof of service shall not affect the validity of the service.

Personal or substituted personal service shall be proved by the affidavit of the server indicating the time and date, place and manner of service, that the server is an adult resident of the state of service not a party tot the action, that the server knew the person

LOEVY & LOEVY

311 N. Aberdeen St., 3rd Floor, Chicago, Illinois 60607

December 3, 2020

Via Hand Delivery

Matt Krauter
City Clerk/Treasurer
City of Kenosha
625 52nd Street
Kenosha, WI 53140

Daniel G. Miskinis
Chief of Police
Kenosha Police Department
1000 55th Street
Kenosha, WI 53140

Regi Bachochin
County Clerk
Kenosha County
1010 56th Street
Kenosha, WI 53140

David G. Beth
Sheriff
Kenosha County
1000 55th Street
Kenosha, WI 53140

Re: Notice of claims of John Huber, Jr., Karen Bloom, and John Huber, Jr. as personal representative of Estate of Anthony Huber

To Whom It May Concern:

I write on behalf of John Huber, Jr. and Karen Bloom pursuant to Wisconsin Statute § 893.80 to provide notice of state law claims that they have against the City of Kenosha, Kenosha County, the Kenosha County Sheriff's Department, Police Chief Miskinis, Sheriff Beth, and as-yet unknown employees or former employees of the City of Kenosha, Kenosha Police Department, or Kenosha County Sheriff's Department.

Claimant's Address:

Mr. Huber and Ms. Bloom may be contacted through their attorneys (Elizabeth Wang, Steven Art, Anand Swaminathan) at the following address:

Loevy & Loevy
311 N. Aberdeen St., 3rd Fl.
Chicago, IL 60607
O: 312.243.5900
F: 312.243.5902
steve@loevy.com
anand@loevy.com
elizabethw@loevy.com

Factual Background:

On August 25, 2020, Anthony Huber, the son of John Huber, Jr. and Karen Bloom, was killed in Kenosha, Wisconsin. Anthony Huber lost his life to protect innocent civilians who were out that night protesting the shooting of Jacob Blake. There was no justification for Anthony's murder. Kyle Rittenhouse, a minor from out of state, illegally armed with an assault rifle, was allowed – by the Kenosha police and Kenosha Sheriff's Department – to roam the streets, threatening numerous civilians, and ultimately shooting three people. After Rittenhouse had already shot and killed one person, Anthony selflessly tried to disarm him and was killed himself.

In response to the demonstrations in response to the killing of Jacob Blake, a far-right militia group, the Kenosha Guard, organized a call-to-arms event on Facebook. The Kenosha Guard and its members expressly encouraged and incited violence and called on others to join them. Before August 25, 2020, the Kenosha Guard posted an open letter to the Kenosha Chief of Police, requesting that the local police cooperate with the militia members, abstain from sending home or arresting members of the Kenosha Guard, and for the police to keep an open line of communication with them. The Kenosha Police and Kenosha Sheriff's Department were aware of, condoned, cooperated with and enabled the actions of the Kenosha Guard and other armed vigilantes through both explicit and implicit support. For example, officers from the Sheriff's Department handed out water to the armed vigilantes and thanked them for their presence.

Rittenhouse answered the Kenosha Guard's call to arms. By the end of the evening, Rittenhouse had shot and killed two people, including Anthony Huber, and injured a third person. After killing the first person, Rittenhouse told someone on the phone, "I just killed somebody." He walked toward the police on the scene with his hands up as a number of bystanders yelled to the police that Rittenhouse was the shooter. However, the police ignored him and did not apprehend him.

Claims:

Claimants allege multiple state law claims against the City, the County, the Police Chief, the Sheriff, and as-yet unknown employees or former employees of the Kenosha Police Department and Kenosha County Sheriff's Office who were involved in the events resulting in Anthony Huber's death, including negligence, negligent supervision and training, negligent and intentional infliction of emotional distress, wrongful death, survival, *respondeat superior*, and indemnification.

In addition to these state law claims for which notice may be required, Claimants allege federal claims for which notice is not required.

Itemized Damages:

Claimants request \$10,000,000.00 as compensation, for themselves and the Estate of Anthony Huber. Mr. Huber and Ms. Bloom have suffered damages on their own behalf, including for the loss of companionship of their son. Anthony Huber suffered damages including pain and suffering prior to death and the loss of his life.

Please let me know if you require any further information or if we can assist in any way your review of Mr. Huber and Ms. Bloom's claims.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Wang', with a stylized, cursive script.

Elizabeth Wang