

October 9, 2025

VIA EMAIL: mbecker@whitewater-wi.gov

City of Whitewater Community
Development Authority
Attn: Mason Becker
312 Whitewater Street
Whitewater, WI 53190

Dear Mason:

This letter provides a status update on the Fine Food Arts LLC/Jay Stinson collection matter that Stafford Rosenbaum LLP (“Stafford”) is handling for the City of Whitewater, Community Development Authority (“CDA”). As of the date of this letter, there are no updates on other collection matters that Stafford is handling for CDA.

Fine Food Arts LLC/Jay Stinson

A. Status

On September 5, 2025, the Court granted CDA’s motion for default judgment against Fine Food Arts LLC, which also entitled CDA to recover its attorneys’ fees and costs of collection. On September 19, 2025, we filed a motion and proposed order with the Court seeking approval of CDA’s attorneys’ fees and costs of collection with respect to Fine Food Arts. The Court also granted CDA’s motion for leave to supplement its complaint and bring in Daniel Rodriguez and K.L.D. LLC.

We engaged a process server to serve Mr. Rodriguez and K.L.D. with CDA’s amended summons, complaint, and supplemental complaint. The service package for Mr. Rodriguez also includes a letter and copy of the Court’s default judgment order. The letter requests that Mr. Rodriguez contact us immediately in his capacity as the owner of Fine Food Arts to arrange for Fine Food to pay its judgment and turn over CDA’s collateral.

The process server attempted to serve or otherwise contact Mr. Rodriguez on numerous occasions, but was unable to accomplish personal service. However, the process server was successful in serving K.L.D. through its registered agent on September 23, 2025. Since Mr. Rodriguez appears to be actively avoiding service, we contacted a local newspaper in Walworth County to accomplish service by publication. The newspaper informed us that the third and final publication will occur this Friday on October 10, 2025. As such, Mr. Rodriguez will be deemed to have been served on October 10, 2025.

October 9, 2025

Page 2

After CDA agreed to withdraw its motion for default judgment against Jay Stinson in exchange for his agreement to withdraw his motion to dismiss, Mr. Stinson answered CDA's original complaint by generally denying CDA's allegations. We have repeatedly attempted to contact Mr. Stinson and his counsel regarding his obligation to answer the allegations in CDA's supplemental complaint and to begin exploring whether a settlement may be in prospect. However, as of the date of this letter, Mr. Stinson has not answered CDA's supplemental allegations. As such, we filed a letter and proposed order with the Court on September 23, 2025 requesting that the Court enter an order demanding that Mr. Stinson and Fine Food Arts answer CDA's supplemental allegations.

B. Next Steps

K.L.D. has until October 13, 2025 to answer CDA's allegations. Similarly, once Mr. Rodriguez has been served through publication, he will have 20 days to answer CDA's allegations. Once they have answered, we will seek a scheduling conference to schedule out the remaining steps of the lawsuit.

If Mr. Rodriguez does not respond to CDA's letter and cooperate in arranging for CDA to recover its collateral, we will seek a writ of replevin. This is a fairly straightforward process that directs the sheriff to assist in recovering the collateral.

If the Court enters an order demanding that Mr. Stinson and Fine Food Arts answer CDA's supplemental complaint, they will be given a designated amount of time (approximately 20 days) by which they must answer the supplemental allegations.

Lastly, a hearing is scheduled for next Friday, October 17, 2025 regarding our motion and proposed order seeking approval of CDA's attorneys' fees and costs of collection. However, Attorney Mason Higgins is out of the office on military leave through the end of October. As such, we sent a letter to the Court requesting that the hearing be rescheduled out another month in order to allow Attorney Higgins to participate. If, for whatever reason, the Court declines to reschedule the hearing, we will be prepared to attend the hearing on behalf of CDA.

Best regards,

STAFFORD ROSENBAUM LLP

A handwritten signature in black ink, appearing to read 'I3f' or similar stylized initials.

Iana A. Vladimirova

October 9, 2025

Page 3

IAV:nkb

cc: Ian Lane

Mason Higgins