

STATE OF MINNESOTA  
COUNTY OF WASHINGTON

DISTRICT COURT  
TENTH JUDICIAL DISTRICT  
Case Type: Civil/Other (Misc.)

---

John P. Norusis,  
Plaintiff,

Court File No. 82-CV-20-3974  
The Hon. Douglas B. Meslow

vs.

City of Marine on Saint Croix,  
Defendant.

---

**DEFENDANT'S AMENDED NOTICE OF MOTION  
AND MOTION FOR SUMMARY JUDGMENT**

---

TO: Plaintiff John P. Norusis and his attorneys of record, Michael D. Schwartz,  
Brandon M. Schwartz, SCHWARTZ LAW FIRM, 600 Inwood Avenue N., Suite  
130, Oakdale, MN 55128.

**AMENDED NOTICE OF MOTION**

PLEASE TAKE NOTICE that, on July 9, 2021, at 9:00 a.m., Defendant City of Marine on St. Croix will bring the following motion before the Honorable Douglas B. Meslow, Judge of the Tenth Judicial District Court, at the Washington County Courthouse, 14949 62nd Street North, Stillwater, MN 55082, pursuant to Minnesota Rules of Civil Procedure. Said motion shall be upon all the files, arguments of counsel and affidavits herein.

**MOTION**

YOU WILL PLEASE TAKE NOTICE that the undersigned attorneys for Defendant will move the above-named Court for an Order directing that, pursuant to Rule 56 of the

Minnesota Rules of Civil Procedure, Defendant is entitled to a summary judgment in its favor dismissing the action on the general ground that there is no genuine issue as to any material fact and that said Defendant is entitled to a judgment as a matter of law.

Dated: May 13, 2021

s/Paul D. Reuvers

Paul D. Reuvers, #217700

Andrew A. Wolf, #398589

IVERSON REUVERS

9321 Ensign Avenue South

Bloomington, MN 55438

(952) 548-7200

paul@iversonlaw.com

andrew@iversonlaw.com

*Attorneys for Defendant*