

FILED
01-02-2025
Clerk of Circuit Court
Waukesha County
2024CV001729



January 2, 2025

VIA ELECTRONIC FILING TO:

Honorable Brad D. Schimel
Circuit Court Judge
Waukesha County Circuit Court
515 W. Moreland Boulevard, C295
Waukesha, WI 53188

RE: *Mark D. Block v. John Doe*
Waukesha County Case No.: 2024-CV-1729

Dear Judge Schimel,

This case originated when it came to light that Plaintiff's personal information (specifically, his email address) was used to submit a large number of small dollar political donations. After exhausting options to identify and contact the party using his email address, including sending correspondence to the then known addresses of Bernard L. Cain, Jr. (the person whose name was associated with the donations), Plaintiff filed this John Doe complaint.

Once initiated, third-party discovery was sought from multiple entities to locate "John Doe." As noted in Plaintiff's November 5, 2024, Motion to Conduct Additional Discovery ("Motion"), the donation patterns connected with Plaintiff's email tracked patterns of other individuals who had raised questions about the validity of donations made in their name.

Additional efforts were undertaken to contact and serve Mr. Cain with a deposition subpoena. On December 17, 2024, counsel for Bernard L. Cain, Jr., contacted undersigned counsel and advised that Mr. Cain had, in fact, made the contributions connected to Plaintiff's email address.

After a review of additional documentary evidence provided through Mr. Cain's counsel, Plaintiff respectfully submits that the proper course is to withdraw the subpoenas for additional discovery and file a voluntary notice of dismissal.

Respectfully submitted,

/s/ Electronically Signed by Richard P. Lawson

cc: Counsel of Record (via efile)
Client

AMERICA FIRST POLICY INSTITUTE
1635 Roger Road, Fort Worth, Texas 76107
Phone (703) 637-3690