

FILED  
10-12-2022  
Clerk of Circuit Court  
Outagamie County  
2015CF000551

STATE OF WISCONSIN CIRCUIT COURT OUTAGAMIE COUNTY  
BRANCH III

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STATE OF WISCONSIN,

Plaintiff,

v.

Case No.: 15 CF 551

TRAVIS J. HUSS,

Defendant.

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**DEFENDANT'S NOTICE OF MOTION AND MOTION FOR ADJOURNMENT**

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TO: Assistant District Attorney Richard Dufour  
Outagamie County District Attorney's Office  
320 S. Walnut Street  
Appleton, WI 54911  
Email: richard.dufour@da.wi.gov

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that the Defendant, Travis J. Huss, appearing specially by the Attorney Chadwick J. Kaehne Law Firm, S.C., specifically Attorney Chadwick J. Kaehne, and reserving the right to challenge the Court's jurisdiction, at a date and time determined by the Court, if necessary, before the Honorable Mitchell J. Metropulos, presiding judge, Outagamie County Circuit Court, Branch III, for an Order of Adjournment of the *Jury Trial*, currently scheduled for **October 25 & 26, 2022** in the above-captioned matter.

**MOTION**

COMES NOW, the Defendant, Travis J. Huss, appearing specially by the Attorney Chadwick J. Kaehne Law Firm, S.C., specifically Attorney Chadwick J. Kaehne, and reserving the right to challenge the Court's jurisdiction, hereby moves the Court for an Order of Adjournment of the of the *Jury Trial*, currently scheduled for **October 27 & 28, 2022** in the above-captioned matter.

AS GROUNDS FOR THIS MOTION, the Defendant asserts:

1. That a *Jury Trial* is currently scheduled for October 25 & 26, 2022.
2. Undersigned Counsel is scheduled for eye surgery October 21, 2022 as a result of a blunt trauma and the anticipated recovery period may be several weeks.
3. That Mr. Huss is not a flight risk. He has immediate family in the area and is currently employed.

4. That undersigned counsel makes this adjournment request because of reasons stated above which will detracted from effective trial preparation with Mr. Huss.
5. That Mr. Huss does not object to undersigned counsels request for an adjournment at this time.
6. That the court appointed undersigned-counsel to represent the Defendant in this matter. This case includes serious charges, and the case history is seemingly protracted, carries a substantial amount of past litigation, including but not limited to a jury trial that resulted in a mistrial, and presents complex evidentiary trial issues. Indeed, the court record is extremely voluminous in this matter, which consists, so far, of two-hundred and forty (240) filed documents amounting, by rough estimate, to thousands of pages.
7. That undersigned counsel needs additional time, inter alia, to continue his review of the court record, transcripts of past proceedings, discovery materials, and other investigative action in this matter. Until the undersigned has completed such actions, he will not be in a position to determine what legal motions need to be filed in advance of trial, if any, and to sufficiently advise the Court on case status at a pretrial conference.
8. That the parties request that the *Jury Trial* in this matter be placed on the court calendar in either late August or September to allow time to complete discovery review and settlement discussions.

WHEREFORE, the Defendant respectfully requests that the **October 25 & 26 2022, Jury Trial** be adjourned.

DATED this Wednesday, October 12, 2022.

Respectfully Submitted,  
THE ATTORNEY CHADWICK J.  
KAEHNE LAW OFFICE, S.C.  
*Electronically signed by:*

/s/ Chadwick J. Kaehne

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Chadwick J. Kaehne  
Attorney for Defendant  
State Bar No.: 1045611

Prepared by:  
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