

APPROXIMATELY 2,000 BEAGLE DOGS AND PUPPIES,

Petitioners,

v.

RIDGLAN FARMS, INC.

Respondent.

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**NOTICE OF MOTION AND MOTION FOR A TEMPORARY INJUNCTION  
AND APPOINTMENT OF GUARDIAN AD LITEM/REFEREE**

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Kristin Schrank (SBN 1073997)  
SCHRANK LAW, S.C.  
PO Box 49  
Muskego, WI 53150  
Tel: (262) 679-2094  
kms@schranklaw.com

Christopher A. Berry (CA Bar No. 283987)\*  
NONHUMAN RIGHTS PROJECT, INC.  
455 Market Street Ste. 1940  
San Francisco, CA 94105  
Tel: (888) 255-2612  
cberry@nonhumanrights.org

Chris Carraway (CO Bar No. 46663)\*  
ANIMAL ACTIVIST LEGAL DEFENSE PROJECT  
2255 E. Evans Avenue  
Denver, CO 80210  
Telephone: (423) 797-6084  
Chris.Carraway@du.edu

Attorneys for Petitioners

\* pro hac vice motion pending

## NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that Petitioners in this action, by their undersigned counsel, hereby respectfully move the Court for: (A) a temporary injunction, in accordance with Wis. Stat. § 813.02(1)(a), against Ridglan Farms, Inc., its officers, agents, servants, employees, and anyone working in active concert with it; and (B) appointment of a guardian ad litem/referee to monitor the welfare of the dogs and provide a report to this Court. As set forth in the accompanying Brief in Support of Motion for An Ex Parte Temporary Injunction and Appointment of Guardian ad Litem/Referee, Petitioners have a reasonable probability of success on the merits of their claims that Ridglan is violating Wis. Stat. § 951.02 and Wis. Stat. § 951.14 by failing to provide safe and sanitary living conditions to the thousands of beagles still housed at their facility in Blue Mounds, Wisconsin.

Petitioners specifically request that, during the pendency of proceedings, the Court:

- A. Enter a temporary injunction to:
  1. Prohibit the euthanasia of any dogs at the Ridglan facility without the consent of the guardian ad litem/referee or a court order.
  2. Prohibit the sale or transfer of dogs at the Ridglan facility unless they are being placed in foster homes, adopted out, or transferred to bona fide rescue organizations that can rehabilitate their suffered injuries.
- B. Use its inherent authority and authority granted by Wis. Stat. § 805.06(1) to appoint a guardian ad litem/referee to assess the conditions of the beagles

and, pending final resolution of the litigation, recommend further action to the Court. The guardian ad litem/referee will be empowered to:

1. Access Ridglan's facility site, dogs, and associated dog care and veterinary records for the purpose of assessing the dogs' living conditions and care.
2. Record conditions at the Ridglan facility, including through the use of photographs, videos, and audio recordings.
3. Make an initial report to the Court assessing and documenting the welfare of the dogs; providing a census of every dog and puppy at Ridglan including identifying each beagle individually by sex, age, unique identification number, and enclosure location and number; recommending further action, including whether any dogs from Ridglan require removal from the facility due to the need for immediate veterinary care, whether a supervised care-in-place should be instituted using services of volunteer veterinarians and other volunteer experts, and whether additional assessments should occur.

Dated: January 30, 2026

*s/ Kristin Schrank*

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Kristin Schrank (SBN 1073997)  
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Tel: (262) 679-2094  
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