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November 17, 2009

Court Administrator
Attn: Civil Filing
Hennepin County Government Center
300 South 6th Street
Minneapolis, MN 55487

Re: *Christopher Roller v. Wagner, Falconer & Judd, Ltd.*
Court File No. 27-CV-09-22812
Our File No. 1-671-0001

Dear Court Administrator:

Enclosed for filing in the above referenced matter, please find:

1. Amended Notice of Motion for Sanctions Under Rule 11.03 and Minn. Stat. § 549.211; and
2. Second Amended Notice of Motion and Motion to Dismiss.

By copy of this letter, we are serving *pro se* Plaintiff and counsel for Defendants Bosley, Inc. and Alexander Gese with a copy of the same.

Very truly yours,

LARSON • KING, LLP

Mark A. Solheim

MAS:lab 1269091

Enclosures

cc: Christopher Roller (via email and U.S. mail) (w/ enc)
Richard B. Allyn, Esq. (via fax and U.S. mail) (w/ enc)

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Christopher Roller,

Court File No. 27-CV-09-22812

Plaintiff,

v.

**AMENDED NOTICE OF MOTION FOR
SANCTIONS UNDER RULE 11.03 AND
MINN. STAT. § 549.211**

Wagner, Falconer & Judd, Ltd.,

Defendant.

TO: Plaintiff *pro se*, Christopher Roller, 14806 Quentin Avenue South, Savage, MN 55378:

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Tuesday, December 8, 2009 at 1:30 p.m., or as soon thereafter as the matter can be heard, before the Honorable Susan Burke, Hennepin County Courthouse, Courtroom 757, Defendant Wagner, Falconer & Judd, Ltd. will move the Court for an Order imposing sanctions against plaintiff pursuant to Rule 11.03 and Minn. Stat. § 549.211.

Dated: November 17, 2009

LARSON • KING, LLP

By


Mark A. Solheim (213226)
Anthony J. Novak (351106)
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
(651) 312-6500

*Attorneys for Defendant Wagner, Falconer &
Judd, Ltd.*

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Christopher Roller,

Court File No. 27-CV-09-22812

Plaintiff,

v.

**SECOND AMENDED NOTICE OF
MOTION AND MOTION TO DISMISS**

Wagner, Falconer & Judd, Ltd.,

Defendant.

TO: Plaintiff *pro se*, Christopher Roller, 14806 Quentin Avenue South, Savage, MN 55378:

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Tuesday, December 8, 2009 at 1:30 p.m., or as soon thereafter as the matter can be heard, before the Honorable Susan Burke, Hennepin County Courthouse, Courtroom 757, Defendant Wagner, Falconer & Judd, Ltd. will move the Court as follows:

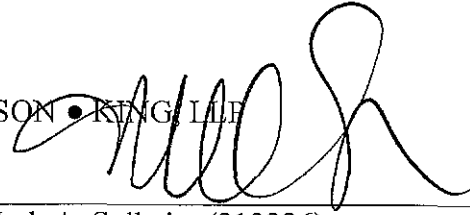
MOTION

Defendant Wagner, Falconer & Judd, Ltd., through their attorneys, hereby moves the Court for an Order dismissing Plaintiff's Complaint with prejudice. This Motion is made pursuant to Rule 12 of the Minnesota Rules of Civil Procedure. This Motion will be based upon the argument of counsel as well as the Memorandum of Law and Affidavit of Counsel and the entire file and proceedings herein.

Dated: November 17, 2009

LARSON • KING LLP

By



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Anthony J. Novak (351106)
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
(651) 312-6500

*Attorneys for Defendant Wagner, Falconer &
Judd, Ltd.*

