

**STATE OF MINNESOTA
COUNTY OF RAMSEY****DISTRICT COURT
SECOND JUDICIAL DISTRICT**

Troy Kenneth Scheffler,
Plaintiff,

Court File Number: **62-CV-25-6308**
Case Type: Civil Other/Misc.
Judge: Laura Nelson

vs.

**NOTICE AND MOTION FOR
SANCTIONS AGAINST
DEFENDANT RAMSEY COUNTY**

Ramsey County,
Bob B. Fletcher, and
Tim Gulden,
Defendants.

TO: Brett Bacon, Assistant Ramsey County Attorney, 360 Wabasha St. N., Suite 100, Saint Paul, MN 55102

PLEASE TAKE NOTICE that Plaintiff Troy Scheffler will bring the following motion for hearing before Judge Laura Nelson at the Ramsey County Courthouse on 10/01/2025, via Zoom .

MOTION

Plaintiff moves the Court for an Order imposing sanctions against Defendant Ramsey County and its counsel pursuant to Minnesota Rule of Civil Procedure 11 for violations of their duty of reasonable inquiry and for presenting documents to the Court for improper purposes in violation of their certifications under Rule 11.02.

This motion is based upon Rules 11 and 115 of the Minnesota Rules of Civil Procedure, the pleadings and documents on file, the affidavit of Plaintiff, supporting memorandum of law, and arguments of counsel. Minnesota Statutes § 549.211 provides parallel and substantially identical standards to Rule 11, as noted by the Minnesota Advisory Committee, and supports the relief requested herein.

NOTICE: Pursuant to Rule 11.03(a)(1) of the Minnesota Rules of Civil Procedure, this motion shall not be filed with or presented to the Court unless, within 21 days after service of this motion, Defendant Ramsey County withdraws or appropriately corrects the sanctionable conduct described herein.

ACKNOWLEDGMENT

Plaintiff Troy Scheffler hereby acknowledges that sanctions may be imposed under the circumstances set forth in Minn. R. Civ. P. 11.

Respectfully submitted,

/s/ Troy Scheffler

Date: 09/08/2025

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