

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN**

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TRADE WELL INTERNATIONAL,
A Pakistan Corporation,

Plaintiff-Appellant,

Case No. 12-cv-701 JDP

DELLS LODGING OPERATOR, INC., and
DELLS ESTATE LLC, (both are Wisconsin
Corporations),

Involuntary-Plaintiffs,

v.

UNITED CENTRAL BANK, a
Texas Corporation,

Defendant.

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CIRCUIT RULE 3(C) DOCKETING STATEMENT

Please Take Notice, that the Plaintiffs-Appellant, TRADE WELL INTERNATIONAL, (“Trade Well”) by and through their attorney, MAURICE JAMES SALEM, hereby set forth a Docketing Statement pursuant to Circuit Rule 3(C).

Jurisdictional Statement:

1. The District Court has international diversity jurisdiction over the dispute in this action, 28 U.S.C. § 1332(a)(3). The amount in controversy exceeds \$75,000, exclusive of interests and costs. According to the Securities and Exchange Commission of Pakistan (SECP), established under the Securities and Exchange Commission of Pakistan Act 1997, Plaintiff-Appellant Trade Well International is a Private Limited Company, (PVT) Limited, with five (5) owners who are all citizens of, and reside in, Pakistan, and the Company’s principle place of business is in Pakistan.

Defendant-Appellee, United Central Bank, is a Texas Corporation with its principal place of business being in Texas. Thus, there is complete diversity and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

The Court of Appeals has jurisdiction under 28 U.S.C. § 1291, in that the decision from which this appeal is sought is a final order that dismissed the counterclaim in this action.

2.
 - (i) Date of final order being appealed is: September 24, 2015. (Doc. 135)
 - (ii) Motion for reconsideration not filed
 - (iii) N/A
 - (iv) Notice of Appeal filed: October 22, 2015.
3. There is no prior related action and this appeal is from a final order.
4. This appeal is taken from the District Court's September 24, 2015, Order (Doc. 135) that denied Plaintiff motion to vacate default judgments on the counterclaim and the main action (Doc. 125).

Issues raised

1. Whether the district court lacked both personal jurisdiction and subject matter jurisdiction, after removing its counsel and while on appeal, to continue litigation and to enter a default judgment on the main action and counterclaim.
2. Whether Plaintiff's diligence in seeking new counsel was sufficient?
3. Whether the Seventh Circuit's decision remanding this case is also a mandate to vacate the orders that were entered during the appeal and that resulted from the erroneous orders entered by that district court, which were vacated on appeal.

Record on Appeal

- 1) Motion to Vacate Orders (Doc. 125)
- 2) Affidavit of Plaintiff's Attorney (Doc. 127)
- 3) Order setting hearing (Doc. 130)
- 4) Brief in Reply to Order (Doc. 131)
- 5) Brief Exhibits A - D (Doc. 131-1 to 4)
- 6) Conclusion of Law (Doc. 133)
- 7) Transcripts of hearing September 17, 2015
- 8) Order denying motion, September 24, 2015 (Doc. 135)

Dated: Palos Heights, Illinois
October 22, 2015

Respectfully submitted,

/s/Maurice James Salem,
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Certificate of Service

I, Maurice James Salem, am the attorney for Appellants and I hereby certify that I served a true copy of the above Docketing Statement on counsels, on October 22, 2015, by this Court CM/ECF system.

/s/ Maurice James Salem