

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

ONE WISCONSIN INSTITUTE, INC.,
CITIZEN ACTION OF WISCONSIN EDUCATION
FUND, INC., RENEE M. GAGNER,
ANITA A. JOHNSON, CODY R. NELSON,
JENNIFER S. TASSE, SCOTT T. TRINDL
and MICHAEL R. WILDER,

Plaintiffs,

15-cv-324-jdp

v.

JUDGE GERALD C. NICHOL, JUDGE ELSA LAMELAS,
JUDGE THOMAS BARLAND,
JUDGE HAROLD V. FROECHLICH,
JUDGE TIMOTHY VOCKE, JUDGE JOHN FRANKE,
KEVIN J. KENNEDY and MICHAEL HAAS,

Defendants.

AFFIDAVIT OF JAMIE FEUERHELM

STATE OF WISCONSIN)

COUNTY OF PIERCE)

Jamie Feuerhelm, being first duly sworn, on oath deposes and states:


1. I am the County Clerk for Pierce County, having served in that capacity for 18 years.
2. My office is located in the Pierce County Courthouse at 414 W. Main Street, P.O. Box 119, Ellsworth, Wisconsin 54011.
3. That attached hereto is a true and correct copy of a Subpoena dated October 1, 2015, and signed by Joseph Wenzinger, Perkins Coie LLP, 700 13th Street NW #600, Washington D.C. 20005, and served upon me on October 7, 2015.

4. I perform my County Clerk duties in Pierce County on a full time basis, and I have the obligation to perform various duties, including but not limited to, those specifically set forth in Sec. 59.23 Wis. Stats.
5. Attorney Wenzinger has written to me and indicated that in addition to his office in Washington D.C., his firm also has an office located at 1 East Main Street, Suite 201, Madison, Wisconsin.
6. My office in Ellsworth, Wisconsin is approximately 890 miles from Attorney Wenzinger's office in Washington D.C., and approximately 193 miles from Attorney Wenzinger's office in Madison, Wisconsin.
7. I have reviewed the Subpoena, and started work to fulfill the obligations to produce the documentation requested. However, the Subpoena contains 23 numbered document production topics, including one that has 18 subtopics. The topics are exceedingly broad, sweeping and extensive, and upon reviewing the vast breadth of the demand, requires me to produce virtually every document containing election documentation or communications for the time period from January 1 2008 and through the present, as set forth in Subpoena Instruction paragraph number 6.
8. The scope of the Subpoena will require considerable and substantial time and resources in order to comply, in addition to the full time duties required of me by Sec. 59.23 Wis. Stats. and Pierce County, all to the detriment of the citizens of Pierce County.
9. Additionally, the Subpoena calls for all documents to be produced 21 days following service, which occurred on October 7, 2015, or in other words by October 28, 2015. Given the unduly

burdensome scope of the subpoena as set forth above, it is not possible to comply within 21 days.

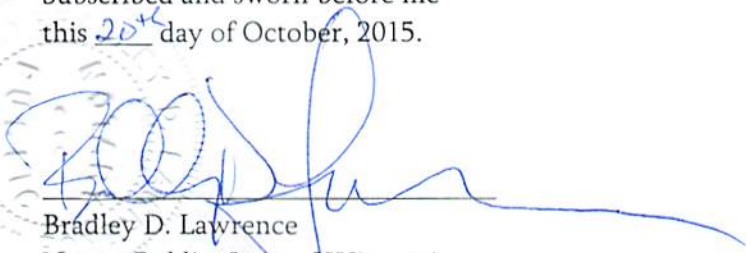
I provide this Affidavit in support of the Motion to Quash Subpoena.

Dated this 20th day of October, 2015.



Jamie Feuerhelm

Subscribed and sworn before me
this 20th day of October, 2015.



Bradley D. Lawrence
Notary Public, State of Wisconsin
My commission is permanent.

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