

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

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RUTHELLE FRANK, et al.,

Plaintiffs,

v.

Case No. 11-CV-1128

GOVERNOR SCOTT WALKER, et al.,

Defendants.

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**FOURTH DECLARATION OF CLAYTON P. KAWSKI**

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I, Clayton P. Kowski, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am one of Defendants' attorneys in the above-captioned matter. I make this Fourth Declaration based on my own personal knowledge and based upon the sources described.

2. I make this Fourth Declaration in support of Defendants' Memorandum in Opposition to Plaintiffs' Civil L.R. 7(h) Expedited Non-Dispositive Motion to Exclude Four of Defendants' Recently Disclosed Witnesses.

3. Attached hereto as Exhibit A is a true and correct copy of an e-mail exchange that occurred between me and Plaintiffs' counsel on August 21 and 22, 2013.

4. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Initial Disclosures of March 7, 2012. Plaintiffs served these disclosures on Defendants on March 7, 2012.

5. Attached hereto as Exhibit C is a true and correct copy of Defendants' Initial Disclosures of March 7, 2012. Defendants served these disclosures on Plaintiffs on March 7, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 30th day of August, 2013.

s/Clayton P. Kawski  
CLAYTON P. KAWSKI