

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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DEFENDANTS' INITIAL DISCLOSURES

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Pursuant to F.R.C.P. 26(a)(1), defendants Governor Scott Walker, Judge Thomas Barland, Judge Gerald C. Nichol, Judge Michael Brennan, Judge Thomas Cane, Judge David G. Deininger, Judge Timothy Vocke, Kevin J. Kennedy, Nathaniel E. Robinson, Mark Gottlieb, Lynne Judd, Kristina Boardman, Donald D. Reincke, Tracy Jo Howard, Sandra M. Brisco, Barney L. Hall, Donald J. Genin, Jill Louise Geoffroy, and Patricia A Nelson (collectively, "Defendants"), by Assistant Attorneys General Thomas C. Bellavia, Carrie M. Benedon, and Clayton P. Kawski, hereby submit the following information for their initial disclosures in this matter.

**26(a)(1)(A) the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information;**

The following individuals are present or former employees of the Wisconsin Department of Transportation and may have knowledge or information about the requirements for obtaining a Wisconsin driver's license and/or identification card.

Kristina Boardman

Patrick Fernan  
Lynne Judd  
Debra L. Kraemer  
Jeremy Krueger  
Alison Lebwohl  
Wanda Little  
James Miller  
Reginald Paradowski  
Nicole Soleimani  
Terry Stark  
Patricia Mayers

The work address and general work telephone number for these individuals is: Wisconsin Department of Transportation, Hill Farms State Transportation Building, 4802 Sheboygan Avenue, Madison, WI 53707; (608) 266-1113.

The following individuals are employees of the Wisconsin Government Accountability Board and may have knowledge or information about the requirements for obtaining identification for purposes of voting in Wisconsin and/or about voter registration in Wisconsin.

David Buerger  
Allison Coakley  
Christopher Doffing  
Edward Edney  
Shane Falk  
Aaron Frailing  
Matthew Giesfeldt  
David Grassl  
Michael Haas  
Adam Harvell  
Sharrie Hauge  
Ross Hein  
John Hoeth  
Blythe Kennedy  
Kevin Kennedy  
Sonia Kubica  
Mike Lauth  
Diane Lowe  
James Malone  
Reid Magney  
Megan McCord Wolfe  
David Meyer  
Katie Mueller  
Julie Nischik  
Ann Oberle

Nadya Perez-Reyes  
Steve Pickett  
Nathaniel Robinson  
Steve Rossman  
Richard Rydecki  
Tiffany Schwoerer  
Sarah Whitt

The work address and general work telephone number for these individuals is: Government Accountability Board, 212 East Washington Avenue, Third Floor, Madison, WI 53703; (608) 266-8005.

The following individuals are employees of Knupp & Watson & Wallman Creative Communications Company, a subcontractor of the Wisconsin Government Accountability Board that has worked on the GAB's public information campaign related to requirements for obtaining identification for purposes of voting in Wisconsin and.

Jack Ferreri  
Sayward Proctor  
Lorraine Lathen (subcontractor of KW2 from Jump at the Sun)

The work address and general work telephone number for these individuals is: Knupp & Watson & Wallman Creative Communications Company, 5201 Old Middleton Road, Madison, WI 53705; (608) 232-2300.

The Defendants also incorporate herein all of plaintiffs' disclosures and reserve the right to supplement this list of persons as they become known through the discovery process.

**26(a)(1)(B) a copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;**

- E-mail and other correspondence sent from, to, or between Wisconsin Department of Transportation staff relating to requirements for application and issuance of Wisconsin driver licenses and identification cards;
- Wisconsin Department of Transportation policies, procedures, and memoranda developed to comply with requirements for application and issuance of Wisconsin driver licenses and identification cards;
- Wisconsin Department of Transportation pamphlets and informational materials developed to comply with requirements for application and issuance of Wisconsin driver licenses and identification cards;
- Wisconsin Department of Transportation press releases relating to requirements for application and issuance of Wisconsin driver licenses and identification cards;

- Wisconsin Department of Transportation forms, including MV3002 and MV3004 developed to comply with requirements for application and issuance of Wisconsin driver licenses and identification cards;
- Wis. Admin. Code chapter Trans 102;
- Documents relating to increasing the number of DMV service facilities, and increasing the business hours of DMV service facilities;
- Wisconsin Department of Transportation data showing numbers of Wisconsin residents issued Wisconsin driver licenses and identification cards;
- Voter Photo ID Speaker's Bureau Request forms
- E-mail and other correspondence sent from, to, or between Government Accountability Board staff relating to requirements for application and issuance of Wisconsin driver licenses and identification cards;
- Government Accountability Board policies, procedures, and memoranda;
- Government Accountability Board pamphlets and informational materials;
- Government Accountability Board manuals, training materials, webinars, teleconference recordings and videos;
- Government Accountability Board meeting materials and minutes;
- Government Accountability Board public service announcement materials (i.e. storyboards, advertisement recordings and videos, palm cards, posters, billboards, bus signs, and other working or distributed materials);
- Government Accountability Board internet and website information;
- Government Accountability Board press releases;
- Government Accountability Board databases, such as SVRS and WEDCS.

The Defendants also incorporate herein all of plaintiff's disclosures and reserves the right to supplement this list of documents as they become known through the discovery process.

**(a)(1)(C) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and**

This provision is inapplicable to the Defendants.

**(a)(1)(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

This provision is inapplicable to the Defendants.

Dated this 7th day of March, 2012.

J.B. VAN HOLLEN  
Attorney General

s/Carrie Benedon

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