

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

RUTHELLE FRANK, et al.,

Plaintiffs,

v.

Case No. 11-CV-1128

SCOTT WALKER, et al.,

Defendants.

**DECLARATION OF S. MICHAEL MURPHY IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION FOR CLARIFICATION OF THE
STIPULATED PROTECTIVE ORDER**

I, S. Michael Murphy, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am one of the attorneys for the defendants in the above-captioned case.
2. Another of the defendants' attorneys, Jody Schmelzer, has corresponded with the plaintiffs regarding discovery. Ms. Schmelzer is on vacation this week, and will not be available to prepare a declaration before the response deadline in this expedited matter. I have reviewed records regularly maintained by our office and consulted with the paralegal assisting document production, and I make this declaration based upon information regularly maintained in our office.
3. Attached hereto as Exhibit A is a copy of the Confidentiality Stipulation and Agreed Qualified Protective Order that was signed by the plaintiff, filed as docket number 268, and ordered by the court at docket number 269.
4. Attached hereto as Exhibit B is a copy of a letter that Attorney Jody Schmelzer sent to counsel for the Defendants on February 17, 2017.
5. Attached hereto as Exhibit C is a copy of a letter that Attorney Jody Schmelzer sent to counsel for the Defendants on March 1, 2017.

6. To date, Defendants have produced over 118 gigabytes of data in discovery for this case. The data includes emails, .pdf documents, and spreadsheets.

7. For a sense of scale, Plaintiffs' motion, marked Document 338 filed August 28, 2017, is 6 pages long and has a total size of 44 kilobytes (0.044 megabytes; 0.000044 gigabytes).

8. Defendants' 118 gigabytes, or 118,000,000 kilobytes, is the data-size equivalent of over 2.6 million copies of Plaintiffs' motion or over 15 million pages.

9. Included in this production is information on millions of people including the majority of Wisconsin residents.

Pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 1st day of September, 2017.

/s/S. Michael Murphy
S. Michael Murphy

General Information

Court	United States District Court for the Eastern District of Wisconsin; United States District Court for the Eastern District of Wisconsin
Federal Nature of Suit	Civil Rights - Voting[441]
Docket Number	2:11-cv-01128