

Multiple Documents

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May 25, 2016

VIA ECF

The Honorable Lynn Adelman
362 United States District Courthouse
517 East Wisconsin Avenue
Milwaukee, WI 53202

Re: *Ruthelle Frank, et al. v. Scott Walker, et al.*, Case No. 11-cv-1128

Dear Judge Adelman,

We represent Plaintiffs in the above-captioned case. Defendants have remarkably asserted that the Stipulated Protective Order entered today only allows attorneys from the ACLU to obtain and review the discovery that is due tomorrow, and *not* other listed co-counsel such as Dechert LLP. Needless to say, all of Plaintiffs' attorneys need to have access to the discovery in order to properly represent their clients and ensure expedient review. Defendants have since seemed to agree with this commonsense principle, yet the parties' attempts to arrive at a mutually acceptable solution have not succeeded. Plaintiffs suggested a simple amendment to the Protective Order (Exhibit A) several hours ago, but Defendants have not responded.

Time is of the essence, and Plaintiffs cannot afford any delay in the receipt and review of Defendants' discovery—by all Plaintiffs' counsel, not just some of them. We thus respectfully request that the Court enter the attached proposed order (Exhibit A), which provides a simple amendment to the Protective Order that would allow all currently listed co-counsel to obtain and review the applicable discovery.

Respectfully,

s/ Sean J. Young

Sean J. Young
Attorney for Plaintiffs
American Civil Liberties Union
Foundation, Inc.

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

RUTHELLE FRANK, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SCOTT WALKER, in his official capacity as
Governor of the State of Wisconsin, et al.,

Defendants.

Civil Action No. 2:11-cv-01128 (LA)

[PROPOSED] ORDER

Any information that is designated as “Confidential” that may be disclosed to any party’s counsel pursuant to any applicable Protective Order, may also be disclosed to those currently listed as co-counsel in this case.

Dated this ____ day of _____, 2016.

Lynn Adelman, District Judge

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