

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

ONE WISCONSIN INSTITUTE, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324

GERALD C. NICHOL, *et al.*,

Defendants.

**DEFENDANTS' NOTICE OF MOTION AND
MOTION FOR SUMMARY JUDGMENT**

TO: PLAINTIFFS' COUNSEL OF RECORD

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 56, Defendants Gerald C. Nichol, Elsa Lamelas, Thomas Barland, Harold V. Froehlich, Timothy Vocke, John Franke, Kevin J. Kennedy, and Michael Haas (collectively, "Defendants"), by their undersigned counsel, hereby move the Court for summary judgment on all pending claims in the above-captioned action.

In addition to the instant motion, Defendants file the following papers:

1. Defendants' Brief in Support of Their Motion for Summary Judgment;
2. Defendants' Proposed Findings of Fact;
3. Declaration of Clayton P. Kowski, with accompanying exhibits;
4. Declaration of Michael Haas, with accompanying exhibits;
5. Declaration of Diane Hermann-Brown;
6. Declaration of Kathleen Nowack;
7. Declaration of Susan Westerbeke;
8. Declaration of Constance McHugh;
9. Declaration of Tim McCumber;
10. Expert Report of M.V. Hood III; and
11. Expert Report of Nolan McCarty.

Defendants' summary judgment motion will be heard at a date and time determined by the Court.

WHEREFORE, Defendants respectfully request that the Court grant their summary judgment motion, dismiss all Plaintiffs' pending claims with prejudice, and grant judgment to Defendants.

Dated this 11th day of January, 2016.

Respectfully submitted,

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