

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

No. 15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

**THIRD DECLARATION OF RUTH M. GREENWOOD IN SUPPORT OF PLAINTIFFS’
RESPONSE TO THE ASSEMBLY’S NOTICE FILED IN SUR-REPLY TO THE
PLAINTIFFS’ MOTION TO COMPEL DEPOSITION AND PRODUCTION OF
DOCUMENTS BY ASSEMBLY SPEAKER ROBIN J. VOS**

I, Ruth M. Greenwood, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am one of the attorneys representing the Plaintiffs in the above-captioned action.

I make this Affidavit on personal knowledge of the facts and circumstances set forth herein.

2. Attached as Exhibit 1 is a true and correct copy of “The Wisconsin State Assembly’s Initial Disclosures” dated December 13, 2018.

Dated this 30th day of April, 2019.

/s/ Ruth M. Greenwood
Ruth M. Greenwood

William Whitford et al., v. Beverly R. Gill et al.,
No. 15-cv-421-jdp

Third Declaration of Ruth M. Greenwood
April 30, 2019

*Exhibit 1 – “The Wisconsin State Assembly’s
Initial Disclosures” dated December 13, 2018*

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

WILLIAM WHITFORD, et al.

Plaintiffs,

v.

Case No. 3:15-CV-00421-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

THE WISCONSIN ASSEMBLY DEMOCRATIC
CAMPAIGN COMMITTEE,

Plaintiff,

v.

Case No. 3:18-CV-00763-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

THE WISCONSIN STATE ASSEMBLY'S INITIAL DISCLOSURES

Intervenor Defendant the Wisconsin State Assembly hereby makes the following initial disclosures. *See* Fed. R. Civ. P. 26(a)(1).

The Assembly makes these initial disclosures based on the information reasonably available to it at this time. In making these initial disclosures, the Assembly does not represent that it is identifying every person likely to have information that it may use to support its defenses or counterclaims or all documents, electronically stored information, or tangible items that it may use to support its claims. Moreover, these initial disclosures are made (1) without admitting or conceding the admissibility (including authenticity) or relevance of any of the information or documents; (2) reserving the right to object during discovery or at trial of this or any other action; and (3) reserving the right to invoke the attorney-client privilege, work product doctrine, or any other applicable privilege. The Assembly expressly reserves the right to amend and/or to supplement these initial disclosures pursuant to Fed. R. Civ. P. 26(e) or otherwise.

I. Individuals likely to have discoverable information

The Assembly discloses the following individuals likely to have discoverable information that the Assembly may use to support its defenses. These disclosures do not include any expert witness who will be identified per Fed. R. Civ. P. 26(a)(2). The Assembly reserves the right to supplement these initial disclosures if, at some time in the future, it identifies additional individuals likely to have discoverable information that the Assembly may use to support its defenses or counterclaims. The Assembly reserves the right to

rely upon the testimony of any of the individuals or entities herein, as well as those named in any supplementary disclosure by the Assembly or any disclosure by any other party, at trial or otherwise, including those made during the previous phase of the *Whitford* case. The Assembly also reserves the right to rely upon testimony of any individual or entity who is deposed in this case.

Name	Subject matter	Contact information
Adam Foltz	The Act 43 redistricting process.	Mr. Foltz may be contacted through the Assembly's counsel: Bartlit Beck LLP 54 W. Hubbard St., Ste. 300 Chicago, IL 60654 (312) 494-4400
Tad Ottman	The Act 43 redistricting process.	Mr. Ottman may be contacted through the Assembly's counsel: Bartlit Beck LLP 54 W. Hubbard St., Ste. 300 Chicago, IL 60654 (312) 494-4400
Republican voters to be identified	The impact of plaintiffs' proposed legislative boundaries.	Bartlit Beck LLP 54 W. Hubbard St., Ste. 300 Chicago, IL 60654 (312) 494-4400
Named plaintiffs	Plaintiffs' alleged injuries and asserted rights.	

II. Documents the Assembly may use to support its defenses

The Assembly discloses the following categories of documents, electronically stored information, and tangible things that it has in its possession, custody, or control and may use to support its counterclaims or defenses. The inclusion of documents, electronically stored information, or tangible items on this list does not necessarily make them discoverable or

relevant, or waive any applicable privilege or protection. The documents, electronically stored information, or tangible items identified represent those materials currently known to the Assembly at this time. The Assembly reserves the right to supplement these initial disclosures if, at some time in the future, it identifies additional documents, electronically stored information, or tangible items that it may use to support its claims.

- All documents and other information produced, exchanged, filed, or otherwise made available during the previous phase of the *Whitford* case.
- All documents and other information produced, exchanged, filed, or otherwise made available during *Baldus v. Wisconsin Government Accountability Board*, Case Nos. 11-cv-0562 and 11-cv-1101 (E.D. Wisc.).
- All documents and other information produced by other parties to this litigation.

III. Computation of damages

The Assembly does not claim damages.

IV. Insurance agreements

The Assembly is not aware of any applicable insurance agreements.

December 13, 2018

BARTLIT BECK LLP

/s/ Adam K. Mortara
Adam K. Mortara, SBN 1038391
Joshua P. Ackerman
54 W. Hubbard Street
Chicago, IL 60654
Ph. 312-494-4400
Fax 312-494-4440
adam.mortara@bartlitbeck.com
joshua.ackerman@bartlitbeck.com

BELL GIFTOS ST. JOHN LLC

/s/ Kevin St. John
Kevin St. John, SBN 1054815
5325 Wall Street, Suite 2200
Madison, WI 53718-7980
Ph. 608-216-7990
Fax 608-216-7999
kstjohn@bellgiftos.com

Attorneys for Wisconsin State Assembly