

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

Case No. 15-CV-421-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY

Intervenor-Defendant

**PRETRIAL DISCLOSURES OF WISCONSIN ELECTION
COMMISSION DEFENDANTS, PURSUANT TO RULE 26(A)(3)**

The Wisconsin Election Commission defendants, Beverly R. Gill, et al., by their attorneys, Wisconsin Attorney General Joshua L. Kaul and Assistant Attorneys General Brian P. Keenan, Karla Z. Keckhaver and Clayton P. Kawski, make the following pretrial disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure:

Rule 26(a)(3)(A)(i): Individuals potentially called to testify regarding this matter.

Defendants expect to call the following witnesses at trial:

1. Sean Trende

Defendants may call all of the plaintiffs as witnesses at trial. Defendants reserve the right to call any witness named on either the plaintiffs' or the Wisconsin State Assembly's witness list.

Rule 26(a)(3)(A)(ii): Individuals whose testimony may be presented by deposition transcript.

Defendants do not intend to present testimony by deposition transcript but reserve the right to counter-designate testimony from depositions used by other parties to the case.

Rule 26(a)(3)(A)(iii): Identification of documents or exhibits.

Defendants are submitting a joint exhibit list with the Wisconsin State Assembly. See that joint exhibit list for an identification of documents or exhibits Defendants expect to offer into evidence at trial.

Dated this 14th day of June, 2016.

JOSHUA L. KAUL
Attorney General

s/ Brian P. Keenan
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