

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

ASHLEE and RUBY HENDERSON, a married)	
couple and L.W.C.H., by his parent and next)	
friend Ruby Henderson, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
vs.)	No. 1:15-cv-220-TWP-MJD
)	
DR. JEROME M. ADAMS, in his official capacity)	
as Indiana State Health Commissioner, <i>et al.</i> ,)	
)	
Defendants.)	

PLAINTIFFS' STATEMENT OF SPECIAL DAMAGES

Plaintiffs, by counsel, respectfully submit the following Statement of Special Damages.

STATEMENT OF SPECIAL DAMAGES

Plaintiffs seek declaratory judgment that I.C. § 31-9-2-15, § 31-9-2-16 and § 31-14-7-1 on their face and as applied to Plaintiffs violate the Equal Protection Clause and Due Process Clause of the Fourteenth Amendment to the United States Constitution. Plaintiffs seek a permanent injunction directing Defendants to presume that Ashlee Henderson, Captain Nicole Singley, Tonya Bush-Sawyer, Cathy Bannick, Sarah Janson, and Nikkole McKinley-Barret are the parents of L.W.C.H., H.S., I.J.B. a/k/a I.J.B-S, H.N.B., Unborn Baby Doe, and G.R.M.B., respectively, and identify them as such on the birth certificates.

Lastly, Plaintiffs seek costs and attorneys' fees incurred in this matter.

Respectfully submitted,

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2015, a copy of the foregoing Plaintiffs' Preliminary Witness & Exhibit List was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the court's electronic filing system. Parties may access this filing through the court's system.

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I further certify that on June 19, 2015, a copy of the foregoing Plaintiffs' Preliminary Witness & Exhibit List was mailed, by first-class U.S. Mail, postage prepaid and properly addressed to the following:

NONE

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