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, *et al.*,	)	
Plaintiffs,	)	
vs.	)	No. 1:15-cv-220-TWP-MJD
DR. JEROME M. ADAMS, in his official capacity as Indiana State Health Commissioner, *et al.*,	)	
Defendants.	)	

PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LISTS

Plaintiffs, by counsel, respectfully submit their Preliminary Witness and Exhibit Lists as follows:

WITNESSES

1. The Plaintiffs;
2. The Defendants;
3. Any person with knowledge of the issuance of birth certificates to any children of the Plaintiffs;
4. Any expert witness(es) retained to testify in this matter;
5. All individuals necessary to authenticate records;
6. All witnesses identified on any witness list submitted by Defendants;

7. Any person(s) identified through discovery;

8. Any witness necessary for rebuttal or impeachment.

EXHIBITS

1. Birth certificates of any children born to the Plaintiffs;

2. Indiana Birth Worksheet, both the state form and as completed by any Plaintiffs;

3. All documents related to the process of obtaining a birth certificate;

4. Any documents regarding the policies and procedures of the Indiana Department of Health, Tippecanoe County Health Department, Marion County Health Department, Bartholomew County Health Department, and Vigo County Health Department related to the issuance of birth certificates;

5. All exhibits attached to any pleadings;

6. Any and all correspondence between the parties;

7. Any and all materials identified/obtained through discovery;

8. Any and all exhibits listed by the other parties in this case;

9. Any and all documents or records relied upon by any expert witness;

10. Any and all exhibits necessary for rebuttal or impeachment.

Plaintiffs reserve the right to amend or supplement this Preliminary Witness and Exhibit List.

Respectfully submitted,

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Attorneys 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 filling 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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