

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

Shannon Miller, Jen Banford,  
and Annette Wiles,

Plaintiffs,

v.

The Board of Regents of the  
University of Minnesota,

Defendant.

Case No. 15-cv-03740 (RHK/LIB)

**DEFENDANT’S MEET-AND-CONFER  
STATEMENT REGARDING MOTION  
TO COMPEL DISCOVERY**

I, Jeanette M. Bazis, representing Defendant The Board of Regents of the University of Minnesota (“the University”), hereby certify that I conferred in good faith with counsel for Plaintiffs in an effort to obtain without court action the discovery that is the subject of the University’s Motion to Compel Discovery. Specifically, Plaintiffs’ counsel and I conferred by telephone on July 27 and October 17, 2016; by letters dated July 25, August 8, August 12, and October 25, 2016; and by emails on September 27, October 13, October 25, October 31, November 1, and November 3, 2016. The parties were unable to agree on the resolution of any of the issues raised by the motion.

Dated: November 3, 2016

**GREENE ESPEL PLLP**

s/ Jeanette M. Bazis  
Jeanette M. Bazis, Reg. No. 255646  
Katherine M. Swenson, Reg. No. 0389280  
222 South Ninth Street, Suite 2200  
Minneapolis, MN 55402  
jbazis@greeneespel.com  
kswenson@greeneespel.com  
(612) 373-0830

- and -

DOUGLAS R. PETERSON  
General Counsel  
University of Minnesota  
By Timothy J. Pramas, Reg. No. 240321  
Senior Associate General Counsel  
360 McNamara Alumni Center  
200 Oak Street S.E.  
Minneapolis, MN 55455  
pram0001@umn.edu  
(612) 624-4100

*Attorneys for Defendant Board of Regents of  
the University of Minnesota*