

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

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**ALINA BOYDEN and  
SHANNON ANDREWS,**

Plaintiffs,

Case No. 17-cv-264

vs.

**STATE OF WISCONSIN DEPARTMENT  
OF EMPLOYEE TRUST FUNDS, et al.,**

Defendants.

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**PLAINTIFFS' MOTION TO COMPEL DOCUMENTS AND TESTIMONY  
RELATED TO DECEMBER 30, 2016 CLOSED SESSION**

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The above-named Plaintiffs, by and through their undersigned counsel, the American Civil Liberties Union of Wisconsin Foundation, the American Civil Liberties Union Foundation, and Hawks Quindel, S.C., respectfully request that the Court enter an order compelling Defendants, State of Wisconsin Department of Employee Trust Funds, et al, to produce in discovery the January 13, 2017 memo authored by the Department of Justice, the meeting minutes from the December 30, 2016 closed session of Defendant, Government Insurance Board ("GIB"), to require Defendants to permit deposition testimony about the December 30, 2016 GIB closed session, including reopening the depositions of witnesses who attended the December 30, 2016 closed session and have already been deposed.

Dated this 27th day of April, 2018.

**HAWKS QUINDEL, S.C.**

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