

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

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ALINA BOYDEN and  
SHANNON ANDREWS,

Plaintiffs,

v.

Case No. 17-CV-0264

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

Defendants.

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**DECLARATION OF COLIN ROTH**

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I, **COLIN ROTH**, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am employed as an Assistant Attorney General at the Wisconsin Department of Justice (DOJ). I am one of the attorneys for the State of Wisconsin Department of Employee Trust Funds, State of Wisconsin Group Health Insurance Board, and Robert J. Conlin in the above-captioned matter.

2. This declaration is based on my review of DOJ's files for the above-captioned matter and it is also based on my personal knowledge.

3. Attached hereto as Exhibit A is a true and correct copy of the State Defendants' Supplemented Responses and Objections to Plaintiffs' First Set of Requests For Admission, Interrogatories, and Requests For Production

of Documents and Things, dated January 16, 2018 (original responses) and April 20, 2018 (supplemental response).

4. Attached hereto as Exhibit B is a true and correct copy of the State Defendants' Responses and Objections to Plaintiffs' Second Set of Requests For Admission and Interrogatory to State Defendants, dated April 27, 2018.

5. Attached hereto as Exhibit C is a true and correct copy of Exhibit 2 to the deposition of Lisa Ellinger, Dkt. 68.

6. Attached hereto as Exhibit D is a true and correct copy of Exhibit 3 to the deposition of Lisa Ellinger, Dkt. 68.

7. Attached hereto as Exhibit E is a true and correct copy of Exhibit 7 to the deposition of Lisa Ellinger, Dkt. 68.

8. Attached hereto as Exhibit F is a true and correct copy of Exhibit 16 to the deposition of Lisa Ellinger, Dkt. 68.

9. Attached hereto as Exhibit G is a true and correct copy of Exhibit 2 to the deposition of Jeffrey Bogardus, Dkt. 77.

10. Attached hereto as Exhibit H is a true and correct copy of Exhibit 1 to the deposition of David Nispel, Dkt. 52.

11. Attached hereto as Exhibit I is a true and correct copy of Exhibit 6 to the deposition of Michael Farrell, Dkt. 53.

12. Attached hereto as Exhibit J is a true and correct copy of Exhibit 15 to the deposition of Michael Farrell, Dkt. 53.

13. Attached hereto as Exhibit K is a true and correct copy of Exhibit 4 to the deposition of Herschel Day, Dkt. 51.

14. Attached hereto as Exhibit L is a true and correct copy of Exhibit 5 to the deposition of Herschel Day, Dkt. 51.

15. Attached hereto as Exhibit M is a true and correct copy of Exhibit 6 to the deposition of Herschel Day, Dkt. 51.

16. Attached hereto as Exhibit N is a true and correct copy of Exhibit 1 to the deposition of Robert Conlin, Dkt. 54.

17. Attached hereto as Exhibit O is a true and correct copy of Exhibit 17 to the deposition of Robert Conlin, Dkt. 54.

18. Attached hereto as Exhibit P is a true and correct copy of the expert witness report of Stephanie Budge, Ph.D. in this matter, dated February 19, 2018.

19. Attached hereto as Exhibit Q is a true and correct copy of the expert witness report of Dr. Lawrence S. Mayer in this matter, dated April 19, 2018.

20. Attached hereto as Exhibit R is a true and correct copy of the expert witness report of David V. Williams in this matter, dated April 19, 2018.

*[Signature page follows]*

I declare under penalty of perjury that the forgoing is true and correct.

Executed on the 31st day of May, 2018.

s/ Colin T. Roth  
COLIN ROTH