

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

ALINA BOYDEN and
SHANNON ANDREWS,

Plaintiffs,

Case No. 17-cv-264

v.

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

Defendants.

PLAINTIFFS' PROPOSED SPECIAL VERDICT FORM - LIABILITY

Plaintiffs, by their undersigned attorneys, submit the following Proposed Special Verdict Form regarding the issues of liability:

QUESTION NO. 1: Did Defendants violate Plaintiffs' right to Equal Protection of the law by excluding coverage for procedures, services, and supplies related to medical treatment for gender dysphoria?

Yes _____ No _____

QUESTION NO. 2: Did Defendants violate the Affordable Care Act by excluding coverage for procedures, services, and supplies related to medical treatment for gender dysphoria?

Yes _____ No _____

QUESTION NO. 3: Did Defendants violate Title VII by excluding coverage for procedures, services, and supplies related to medical treatment for gender dysphoria?

Yes _____ No _____

Dated this 7th day of September, 2018.

HAWKS QUINDEL, S.C.

Counsel for Plaintiffs,

By: /s/ Nicholas E. Fairweather
Nicholas E. Fairweather, State Bar No. 1036681
Email: nfairweather@hq-law.com
Caitlin Madden, State Bar No.
Email: cmadden@hq-law.com
Michael R. Godbe, State Bar No. 1104823
Email: mgodbe@hq-law.com
Amanda M. Kuklinski, State Bar No. 1090506
Email: akuklinski@hq-law.com
409 East Main Street
Post Office Box 2155
Madison, Wisconsin 53701-2155
Telephone: (608) 257-0040
Facsimile: (608) 256-0236

**AMERICAN CIVIL LIBERTIES UNION OF
WISCONSIN FOUNDATION**

Counsel for Plaintiffs,

By: /s/ Laurence J. Dupuis
Laurence J. Dupuis, State Bar No. 1029261
Email: ldupuis@aclu-wi.org
Asma I. Kadri, VA State Bar No. 91290
Email: akadri@aclu-wi.org
ACLU of Wisconsin Foundation
207 East Buffalo Street, Suite 325
Milwaukee, Wisconsin 53202
Telephone: (414) 272-4032

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

Counsel for Plaintiffs,

By: */s/ John A. Knight*

John A. Knight

Email: jknight@aclu.org

Carolyn M. Wald

Email: cwald@aclu-il.org

ACLU Foundation

Lesbian Gay Bisexual Transgender Project

150 North Michigan Avenue, Suite 600

Chicago, Illinois 60601

Telephone: (312) 201-9740