

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 EXPERT WITNESS NARRATIVE STATEMENT
JOAN C. BARRETT**

Plaintiffs, Alina Boyden and Shannon Andrews, through their undersigned attorneys, submit the following proposed narrative statement regarding the background and experience of their expert, Joan C. Barrett.

Joan Barrett is a highly experienced health actuary with over thirty-five (35) years of experience. She is currently a Senior Consulting Actuary with Axene Health Partners, LLC. Ms. Barrett received her Bachelor of Arts Degree in Mathematics from Frederick College in Portsmouth, Virginia. She went on to obtain a Master of Arts in Mathematics from Miami University in Oxford, Ohio. Ms. Barrett is a Fellow of the Society of Actuaries, serving as the organization's Vice-President from 2015 to 2017, and an active member of the American Academy of Actuaries where she has qualified to do actuarial work under the standards

promulgated by the Academy. Ms. Barrett also taught mathematics for six (6) years at Miami University in Ohio.

An actuary is a professional who compiles and analyzes statistics and uses that information to provide financial and strategic advice. As a consulting actuary, Ms. Barrett analyzes costs and risks for her clients and evaluates trends in the health insurance market, such as trends in pricing. Ms. Barrett consults for health insurers and employers on a wide variety of topics in the healthcare industry, including processes for setting payment rates for providers, premiums for beneficiaries and pricing of employee benefits.

Ms. Barrett works with numerous clients including large, nationwide health insurers and employers. She has also advised on numerous small and large group rate filings with the appropriate regulatory authority, as well as benefit design and strategic consulting for Fortune 500 employers. Ms. Barrett provided pricing and benefit strategy for large self-insured groups that included developing a complex actuarial system for UnitedHealth Care. In that role, she often estimated the cost of specific benefits including gender confirmation surgery. She has also published ten (10) professional journal articles, at least half of which cover actuarial science in the healthcare industry.

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