

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 T. ROTH IN SUPPORT OF  
DEFENDANTS' MOTIONS IN LIMINE TO EXCLUDE  
EVIDENCE OF VARIOUS DAMAGES**

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I, COLIN T. ROTH, declare pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the following is true and correct:

1. I am an Assistant Attorney General at the Wisconsin Department of Justice and represent the State of Wisconsin-affiliated defendants in the above-captioned matter. I make this declaration based upon my personal knowledge.

2. Attached as Exhibit A to this declaration is a true and correct copy of Plaintiffs' Responses to State Defendants' Second Set of Interrogatories and Requests for Production of Documents.

3. Attached as Exhibit B to this declaration is a true and correct copy of a document produced in this litigation by Plaintiffs marked PL000340.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 7, 2018.

s/ Colin T. Roth  
COLIN T. ROTH

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

v.

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

Defendants.

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**PLAINTIFFS' RESPONSES TO STATE DEFENDANTS' SECOND SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

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Plaintiffs, Alina Boyden and Shannon Andrews, by and through their undersigned attorneys, hereby respond to State Defendants' Second Set of Interrogatories and Requests for Production of Documents as follows:

**GENERAL AND CONTINUING OBJECTIONS**

1. Plaintiffs object to the extent that the Interrogatories and/or Requests for Production of Documents seek disclosure of anything within the scope of the attorney-client privilege, work product doctrine, or any other privilege or limitation on discovery recognized by law. In the event any privileged information is disclosed by Plaintiffs in connection with these responses, such disclosure is inadvertent, unknowing, and does not constitute a waiver of such privilege.

2. Plaintiffs object to the extent that these Interrogatories and/or Requests for Production of Documents seek information or documents that are irrelevant or not reasonably calculated to lead to the discovery of admissible evidence.

3. Plaintiffs object to the extent that these Interrogatories and/or Requests for Production of Documents are overly broad, unduly burdensome, or appear to be proffered merely for the purpose of annoyance, harassment or to cause undue burden and expense.

4. Plaintiffs object to any conditions, instructions, statements, terms, definitions, or requirements contained in Defendants' discovery that seek to modify the obligations set forth by federal law. All such conditions, instructions, statements, terms, definitions, or requirements are not accepted and have been disregarded.

5. Plaintiffs' responses contained herein are based upon the information available to Plaintiffs as of the date these responses are signed by counsel. Plaintiffs reserve the right to supplement or amend these responses to the full extent allowed by law, and as required by Fed. R. Civ. P. 26(e).

6. Plaintiffs object to the use of "all," "every," "each," "any," and similar terms as overly broad and unduly burdensome. Plaintiffs will make a reasonable search of the information and documents available to them for responsive, non-privileged information and documents.

7. Plaintiffs object to the extent that any requests require knowledge that Plaintiffs do not possess.

8. The above-stated objections are general and continuing in nature. They are incorporated into each response below, as if fully stated therein. The general and continuing objections shall be construed alongside and in addition to any specific objections stated below.

Subject to the forgoing General and Continuing Objections and without waiver of same, Plaintiffs respond to State Defendants' Second Set of Interrogatories and Requests for Production of Documents as follows:

### **INTERROGATORIES**

**INTERROGATORY NO. 1.** Describe the "injury and damages" you allege you suffered, as set forth in Paragraphs 115 and 120 of your Second Amended Complaint, including, but not limited to, the "financial damages, mental pain and suffering, humiliation, mental anguish and emotional distress" referenced in Paragraphs 115 and 120 of your Second Amended Complaint.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is unduly burdensome and would more appropriately be addressed by way of deposition testimony; the deposition of Plaintiff, Shannon Andrews, has been noticed by Defendants for September 13, 2018 and the deposition of Plaintiff, Alina Boyden, has been noticed for October 1, 2018. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** As a result of the coverage exclusion and the denial of medically necessary gender confirmation surgery (hereinafter "GCS"), Plaintiff has experienced: stress and anxiety related to the delay in receiving GCS

(Ms. Andrews first took steps to receive GCS in 2012 and then discovered the coverage exclusion, which made it harder to find a therapist to treat her dysphoria because there were no in-network resources to do so, which in turn delayed her GCS) (in 2012 the coverage exclusion used the language “sexual transformation,” which produced additional anxiety and stress for Ms. Andrews; this offensive and demeaning language made her feel unsafe in bringing her need to transition to her primary healthcare provider); financial damages related to paying for medically necessary procedures that would have been covered by her health insurance were it not for the subject coverage exclusion; emotional distress and mental anguish related to the denial of coverage because the denial was demeaning and humiliating and she felt that her employer and state government treated her condition as unworthy of medical treatment; stress and anxiety related to liquidating her Roth-IRA retirement account in order to pay for her GCS in October 2015; stress and anxiety related to the financial burden of having to pay out-of-pocket for procedures necessary to treat her gender dysphoria, including using personal savings and borrowing from family. The reinstatement of the coverage exclusion in February 2017 was also particularly hurtful and distressing.

**AS TO ALINA BOYDEN:** As a result of the coverage exclusion and the denial of medically necessary GCS, Plaintiff has experienced: stress and anxiety related to not being able to receive GCS; financial damages related to obtaining hormone replacement therapy that would have been unnecessary had she been able to obtain GCS (specifically the androgen reducers (spironolactone and finasteride); distress

and shame regarding the incongruence between her gender identity and the primary and secondary sex characteristics of her body; discomfort and anxiety related to the potentially risky side effects from taking unusually high levels of spironolactone to reduce testosterone; distress and emotional harm caused by missing out on dating, swimming, and other things she does not do out of discomfort with others seeing her body. Ms. Boyden has suffered further harm in that she feels demeaned and humiliated by her employer's and her state government's discriminatory treatment of her.

**INTERROGATORY NO. 2.** If you are claiming any injury or damages against any State Defendants due to your inability to obtain a medical procedure(s) to treat your gender dysphoria, provide the following:

- a. Describe the medical procedure(s);
- b. The cost of the medical procedure(s);
- c. The date you were denied insurance coverage for the medical procedure(s); and
- d. Whether or not you were able to obtain the medical procedure(s) without insurance coverage.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is unduly vague and incoherent in that it first requests information about "any injury or damages . . . due to your inability to obtain a medical procedure(s)" but then asks "whether or not you were able to obtain the medical procedure(s)." Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:**

1. Gender Confirmation Surgery 1

- a. Genital reconstruction surgery: vaginoplasty, October 27, 2015;
- b. \$21,000.00;
- c. Ms. Andrews submitted two claims for this surgery: she submitted one claim to WPS (denied February 26, 2016) and the hospital submitted a claim for the remaining services to WPS (April 6, 2016); and
- d. Ms. Andrews was able to obtain the medical procedure without insurance coverage. Additionally, please see Plaintiff's response to Interrogatory No. 3; Plaintiff was able to obtain the procedure without insurance coverage, but not without incurring financial and related harm.

2. Gender Confirmation Surgery 2

- a. Facial feminization surgery, February 7, 2018;
- b. \$49,758.49;
- c. Ms. Andrews did not request coverage for facial feminization surgery because WPS denied her claims for the genital reconstruction surgery listed above; and
- d. Ms. Andrews was able to obtain the medical procedure without insurance coverage. Additionally, please see Plaintiff's

response to Interrogatory No. 3; Plaintiff was able to obtain the procedure without insurance coverage, but not without incurring financial and related harm.

**AS TO ALINA BOYDEN:** Ms. Boyden has not obtained any medical procedures to treat her gender dysphoria; due to the coverage ban, she has been unable to obtain the following medical procedures:

- a. Penectomy, orchiectomy, and vaginoplasty;
- b. Costs for procedures listed in response to subpart “a” vary, but Plaintiff estimates the total cost of these procedures to range between \$20,000.00 and \$30,000.00;
- c. Plaintiff’s health insurance provider first denied her request for GCS on May 20, 2016 and upheld the denial of coverage on July 8, 2016; Plaintiff or Plaintiff’s healthcare provider requested pre-approval for GCS again on or about October 20, 2016 and January 3, 2017, and Plaintiff’s health insurance provider denied this request on January 10, 2017 and upheld this denial on February 21, 2017;
- d. Plaintiff has not been able to obtain any medical procedures to treat her gender dysphoria.

**INTERROGATORY NO. 3.** If you have ever undergone any medical procedures to treat your gender dysphoria that you paid for out-of-pocket (i.e., without insurance coverage), provide the following:

- a. Describe the medical procedure;
- b. The cost of the medical procedure;
- c. The date you were denied insurance coverage for the medical procedure(s); and
- d. Describe the source of funds used to pay for the procedures (e.g., gift money, sale of assets, personal loan, savings, trust account, etc.).

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Ms. Andrews paid out of pocket for both medical procedures described in her response to Interrogatory No. 2 above; see answers to Interrogatory No. 2 a – c, above. Plaintiff paid for the procedures she received in 2015 with funds from two sources: 1) a Roth-IRA retirement account that Plaintiff opened in 2006 with approximately \$16,000.00 of personal funds she had saved while obtaining her undergraduate college degree, and which she cashed out in 2015 to fund her GCS, paying a penalty of approximately 10% (about \$2,000.00); and 2) personal funds from her checking account. Plaintiff paid for the procedure in 2018 with personal funds and \$10,000.00 that she borrowed from her family.

**AS TO ALINA BOYDEN:** Ms. Boyden has not undergone any surgical procedures to treat her gender dysphoria.

**INTERROGATORY NO. 4.** For any damages you are claiming that relate to your out-of-pocket payments (i.e., without insurance coverage), for prior gender dysphoria treatments, provide an itemization of what the expense was for, the

amount, the date the expense was incurred, and any interest you are claiming related to the expense.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is unduly burdensome and vague as to the meaning of “prior gender dysphoria treatments.” Plaintiffs further object to this Interrogatory on the grounds that damages continue to accrue and interest claimed associated with the loss of use of money continues to accrue. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Ms. Andrews claims damages of \$21,000.00 for her out-of-pocket expenses related to the GCS she received in October of 2015; \$16,100.00 of this amount was incurred in September of 2015 and the remaining \$4,900.00 was incurred on October 27, 2015. Plaintiff additionally claims damages of \$49,758.49 for her out-of-pocket expenses related to the GCS she received in February of 2018; \$5,000.00 of this expense was incurred approximately on July 28, 2017 and the remaining \$44,508.49 of this expense was incurred on approximately January 2, 2018. Plaintiff additionally claims prejudgment interest on all of the above damages at the market rate, meaning the average of the prime rate for the period of time in question.<sup>1</sup>

**AS TO ALINA BOYDEN:** Ms. Boyden currently claims damages of \$95.00, representing her \$5.00 per month co-payment since January 2017 to cover hormone replacement therapy that would have been unnecessary had she been able to access

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<sup>1</sup> This method of calculating prejudgment interest was recently adopted by Judge Conley. See *J.K.J. v. Polk Cty., No. 15-cv-428-wmc*, 2018 U.S. Dist. LEXIS 82938, at \*6 (W.D. Wis. May 17, 2018).

gender affirming healthcare coverage. Plaintiff has also paid approximately \$200.00 per year for blood work to monitor testosterone levels since January 2014, and claims damages of \$316.67 representing her costs since January 2017 to cover this blood work. Plaintiff additionally claims prejudgment interest on the above damages at the market rate, meaning the average of the prime rate for the period of time in question (See note 1).

**INTERROGATORY NO. 5.** From January 1, 2014, to the present, what is your gross monthly salary and net monthly salary? Please identify any payroll deductions that were made during this time period and how much the deduction(s) was for.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** As of July 2018, Plaintiff's current gross monthly salary is approximately \$4,377.08 and current net monthly salary is \$2,891.89. Income was approximately 13% lower in 2014. For Plaintiff's payroll deductions, see documents produced in response to Request for Production No. 5.

**AS TO ALINA BOYDEN:** Plaintiff's income from her employer between January 2014 and the present was a 40% teaching assistantship amounting to approximately \$1,105.00 per month net pay and \$1,335.00 gross pay for 9 months of the year (during the academic year). Plaintiff receives health insurance coverage for the entire year; double health insurance costs are deducted from her last three

paychecks of each academic year (on or about April 1<sup>st</sup>, May 1<sup>st</sup>, and June 1<sup>st</sup>) to cover her health insurance costs during the summers. During the 2017-2018 academic year, Plaintiff received a Foreign Language and Area Studies fellowship of approximately \$1,500.00 per month during the academic year; this was paid through UW payroll and is represented in the documents produced in response to Request for Production No. 5. As of August 2018, Plaintiff's current gross monthly salary and current net monthly salary are both \$0.00. Plaintiff anticipates receiving a University Fellowship for the 2018-2019 academic year, and anticipates receiving her first paycheck around October 1, 2018. See Plaintiff's response to Request for Production No. 5.

**INTERROGATORY NO. 6.** From January 1, 2014, to the present, were you provided any other forms of compensation from your employer not included in your monthly salary (i.e., grants, bonuses, commissions, profit-sharing)? If yes, identify what the compensation was, how much it was, and when you received it.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Ms. Andrews was not provided any other forms of compensation from her employer not included in her monthly salary.

**AS TO ALINA BOYDEN:** Ms. Boyden was not provided any other forms of compensation from her employer not included in her monthly salary. Ms. Boyden

anticipates that she will receive a University Fellowship for the forthcoming academic year.

**INTERROGATORY NO. 7.** For each parcel of real property owned by you or in which you have an interest, please state the type of property, address, date acquired and purchase price, outstanding principal balance of indebtedness secured by a lien on the parcel, amount of monthly or other periodic payment, and fair market value of the parcel.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Plaintiff has a 50% interest in a residential property located at 5010 Ironwood Drive, Madison, WI 53716. This property was purchased in 2011 for \$180,000.00, with a 20% down payment and original loan value of \$149,600.00. The outstanding principal balance is \$130,540.98. The monthly payment is \$1,261.97. The fair market value is approximately \$207,000.00. See response to Request for Production No. 7.

**AS TO ALINA BOYDEN:** Plaintiff neither owns nor has an interest in any real property.

**INTERROGATORY NO. 8.** For all stocks, bonds and other securities owned by you in which you have an interest, or have had an interest in since January 1, 2014, please state the name of the company, record owner, number of units, fair

market value, and the amount you received if you sold the stocks, bonds or other securities.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Ms. Andrews does not currently own or have an interest in any stocks, bonds, or security interests. In 2015, Plaintiff had a Roth IRA worth approximately \$20,000.00 which she cashed out early at a penalty in 2015 to fund her GCS received in October 2015.

**AS TO ALINA BOYDEN:** Between January 1, 2014 and the present, Ms. Boyden has not had and does not currently have an interest in any stocks, bonds, or security interests.

**INTERROGATORY NO. 9.** List all accounts, including bank, money market, brokerage, and individual retirement accounts you have had since January 1, 2014. Provide the name and address of the financial institution where the account is maintained, the date opened, the account number, the date and amount of each contribution made by you since January 1, 2014, and the present balance.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Ms. Andrews has one checking account at the Bank of Sun Prairie (228 E. Main Street, Sun Prairie WI 53590), account #309632700. The account was opened in the summer of 2009 and had a balance of \$20,796.41 at Plaintiff's last statement.

**AS TO ALINA BOYDEN:** Ms. Boyden has one checking account at Wells Fargo Bank (430 Gammon Pl, Madison, WI 53719), account #1010203704260. The account was opened at Wachovia in Raleigh, NC in 2008, prior to Wells Fargo's acquisition of Wachovia; as of August 9, 2018 the balance was \$369.05; the present balance is \$70.51.

**INTERROGATORY NO. 10.** List any motor vehicle that you own, lease, or have legal or equitable interest in (including, but not limited to, automobiles, trucks, watercraft, aircraft, motor homes, ATV's, and other recreational vehicles). Provide the type, year, make, model, date acquired, purchase price, outstanding principal balance of indebtedness secured by a lien or loan, amount of monthly or other periodic payment, and fair market value of each motor vehicle identified.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follow:

**AS TO SHANNON ANDREWS:** Ms. Andrews owns a 2003 Saturn Ion. She purchased it for \$2,000.00 from her parents in late 2015, paid in monthly installments

over a period of two years. There is no outstanding principal balance and the current estimated value is \$650.00.

**AS TO ALINA BOYDEN:** Ms. Boyden owns a 2014 Toyota Corolla. She acquired it in January 2015. Plaintiff cannot recall the purchase price and is not aware of the current fair market value. There is no outstanding principal balance.

**INTERROGATORY NO. 11.** Itemize your monthly living expenses from January 1, 2014, to the present by category (such as mortgage(s), motor vehicle loans, electricity, water, telephone, food, clothing, medical and dental care, and insurance), stating for each category the amount expended by you monthly in that category.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is overly broad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** Plaintiff's monthly living expenses are approximately \$600.00 for mortgage, \$25.00 average for gas and electricity, \$60.00 average for food, \$60.00 average for gasoline (automobile), \$60.00 average for telephone bills, \$60.00 average for internet access, \$100.00 average for various medical costs, \$100.00 average for clothing and various sartorial costs, and costs for health insurance are factored into net pay above because it is deducted from Plaintiff's salary. Between 2015 and 2017, Plaintiff also made car payments to her parents of \$100.00 per month on average until she had paid off the full \$2,000.00.

**AS TO ALINA BOYDEN:** Plaintiff's monthly living expenses are approximately \$750.00 per month in rent (exclusive of heat, but inclusive of electricity), \$120.00 per month for phone and internet service, approximately \$75.00 per month average in heating for the home, \$112.50 average for gasoline (automobile), approximately \$100.00 dollars for on-campus parking, approximately \$40.00 average for medical care, \$200.00 average for food, and \$0 for clothing. Ms. Boyden is currently conducting research abroad and will have been abroad for approximately two months by the time she returns to the United States; she has no electricity or housing costs during this time; her monthly expenses for food and transportation during these two months are approximately \$325.00.

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 1.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** None.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 2.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 2.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** See documents Bates-stamped PL000592-000600.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 3.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 3.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** See documents Bates-stamped PL000592-000600.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 4.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 4.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** See documents Bates-stamped PL000592-000600.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 5.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 5.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** See documents Bates-stamped PL000582 and PL000584-000591.

**AS TO ALINA BOYDEN:** See documents Bates-stamped PL000602-000637.

**REQUEST NO. 6.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 6.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** None.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 7.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 7.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** See document Bates-stamped PL000583.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 8.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 8.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** None.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 9.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 9.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** See document Bates-stamped PL000601.

**AS TO ALINA BOYDEN:** See documents Bates-stamped PL000638-000642.

**REQUEST NO. 10.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 10.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** None.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 11.** Produce any documents that you referred to or relied upon in responding to Interrogatory No. 11.

**RESPONSE:** Plaintiffs answer as follows:

**AS TO SHANNON ANDREWS:** None.

**AS TO ALINA BOYDEN:** None.

**REQUEST NO. 12.** Produce a copy of your entire personnel file since January 1, 2014, including, but not limited to, employment history, disciplinary records, promotion records, complaint records, education and training history, and any other documents kept in the regular course of business.

**RESPONSE:** Plaintiffs object to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving any general or specific objections, Plaintiffs answer as follows.

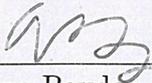
**AS TO SHANNON ANDREWS:** Plaintiff does not have a copy of her personnel file. Plaintiff, through Counsel, has requested a copy and Plaintiff will supplement her discovery responses subject to the above-stated objections and as required by law.

**AS TO ALINA BOYDEN:** Plaintiff does not have a copy of her personnel file. Plaintiff, through Counsel, has requested a copy and Plaintiff will supplement her discovery responses subject to the above-stated objections and as required by law.

AS TO ANSWERS TO INTERROGATORIES:

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: 8-27-18

  
Alina Boyden, Plaintiff

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Shannon Andrews, Plaintiff

AS TO ANSWERS TO INTERROGATORIES:

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Alina Boyden, Plaintiff

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: 08/27/2018

*Shannon R Andrews*  
Shannon Andrews, Plaintiff

AS TO OBJECTIONS AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Dated this 27th day of August, 2018.

**HAWKS QUINDEL, S.C.**

*Counsel for Plaintiffs,*

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**AMERICAN CIVIL LIBERTIES UNION OF  
WISCONSIN FOUNDATION**

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**AMERICAN CIVIL LIBERTIES UNION  
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# Roth Declaration

## Exhibit B