

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

ALINA BOYDEN and
SHANNON ANDREWS,

Plaintiffs,

v.

Case No. 17-CV-0264

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

Defendants.

**DEFENDANTS RESPONSE TO PLAINTIFFS'
EXPERT WITNESS NARRATIVE STATEMENTS**

Defendants hereby respond to Plaintiffs' expert witness narrative statements (Dkt. 164–66) as follows:

I. Dr. Stephanie Budge, Ph.D. (Dkt. 164).

Defendants object to characterizing Dr. Budge as an “internationally recognized” licensed psychologist. (Dkt. 164:1.) This characterization is unnecessary, subjective puffery that does not provide useful information to the jury about Dr. Budge’s objective qualifications. It is also vague—“internationally recognized” by whom? Defendants also object to describing Dr. Budge as having “expertise in gender identity issues.” (Dkt. 164:2.) This is another subjective characterization that does not describe the specific work

she has done with respect to gender identity issues. The specific description of Dr. Budge's experience that follows speaks for itself.

Defendants have no other objections to this narrative.

II. Dr. Loren Schechter (Dkt. 165).

Defendants object to describing Dr. Schechter's "surgical atlas" as a reference guide to "safe, well-established techniques dedicated to surgeries treating gender dysphoria." (Dkt. 165:2.) This description assumes a key fact that is in dispute in this litigation—whether surgical treatments for gender dysphoria are, in fact, safe and well-established. Allowing the jury to hear this unchallenged characterization of Dr. Schechter's background could easily prejudice them on this key issue.

Defendants have no other objections to this narrative.

III. Joan C. Barrett (Dkt. 166).

Defendants object to describing Barrett as a "highly experienced" health actuary. (Dkt. 166:1.) Again, this is unnecessary, subjective puffery that does not provide useful information to the jury about Barrett's objective qualifications.

Defendants have no other objections to this narrative.

[Signature Page follows]

Dated this 14th day of September, 2018.

Respectfully submitted,

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Electronically signed by:

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