

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

CODY FLACK,
SARA ANN MAKENZIE,
MARIE KELLY, and
COURTNEY SHERWIN,

Plaintiffs,

v.

WISCONSIN DEPARTMENT OF
HEALTH SERVICES and
LINDA SEEMEYER, in her official capacity
as Secretary of the Wisconsin Department of
Health Services,

Defendants.

Case No. 3:18-cv-00309-wmc
Judge William Conley

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Cody Flack, Sara Ann Makenzie, Marie Kelly, and Courtney Sherwin, on behalf of themselves and all similarly situated individuals, respectfully move this Court to certify a class for declaratory and injunctive relief under Rules 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure. The Proposed Class is defined as follows:

All transgender individuals who are or will be enrolled in Wisconsin Medicaid, have or will have a diagnosis of gender dysphoria, and who are seeking or will seek surgical or medical treatments or services to treat gender dysphoria.

In addition, Plaintiffs respectfully request that the Court designate them as representatives of the Proposed Class and their undersigned attorneys as counsel for the Proposed Class.

In support of this motion, Plaintiffs submit the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Class Certification.

Dated: October 18, 2018

Respectfully submitted,

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