

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

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

Plaintiffs,

v.

Case No. 18-CV-0309

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

Defendants.

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**DECLARATION OF LORA WIGGINS**

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I, **LORA WIGGINS, M.D.**, pursuant to 28 U.S.C. § 1746, declare as follows:

1. This declaration is based on my personal knowledge.
2. I am a doctor of medicine. I am employed as the Chief Medical Officer of the Medicaid program, State of Wisconsin Department of Health Services. I have held this position since 2010.
3. In my position as Chief Medical Officer, I provide clinical oversight and leadership for the Wisconsin Medicaid program. As Chief

Medical Officer, I make decisions for the Medicaid program in response to Medicaid beneficiaries' claims for Medicaid services.

4. As Chief Medical Officer, it is my position that an adult Medicaid beneficiary's claim for voice therapy services, if it were to be denied, would not be denied pursuant to Wis. Admin. Code § DHS 107.03(23) or (24).

I declare under penalty of perjury that the forgoing is true and correct.

Executed on November 15, 2018.

s/ Lora Wiggins, M.D.  
**LORA WIGGINS, M.D.**