

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

CODY FLACK and
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

JOINT STIPULATION TO BIFURCATE EXPERT DISCOVERY

The Parties jointly stipulate to modify the Preliminary Pretrial Conference Order [Dkt. No. 114] (“Order”), entered by this Court on October 31, 2018, to bifurcate expert discovery on issues of liability and the Named Plaintiffs’ individual damages. Under the Order, “[t]he parties may modify these [expert disclosure] deadlines and procedures only by unanimous agreement or by court order.” Order at 2. The Parties have unanimously agreed that bifurcation of expert discovery is appropriate and thereby stipulate to the following:

1. The Parties will make expert disclosures on issues related to liability under the current schedule set forth in Section 1 of the Order. Order at 2.
2. The Parties will make expert disclosures on issues related to the individual Plaintiffs’ damages under the following schedule:
 - a. Plaintiffs’ disclosures: May 15, 2019
 - b. Defendants’ disclosures: June 15, 2019

c. Plaintiffs' rebuttal disclosures: July 2, 2019

The Parties are seeking no other modifications to the pretrial schedule at this time.

Dated: December 5, 2018

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