

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

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

Plaintiffs,

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

v.

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

Defendants.

OBJECTION TO RULE 45 SUBPOENA

MercyCare Insurance Company, (hereinafter referred to as “MercyCare”) by and through its attorney, Lindsay Renier, moves this Honorable Court to enter an Order to deny production of the requested documents and quash the Subpoena. In support thereof, MercyCare states as follows:

1. That the Plaintiffs were not an insured of MercyCare.
2. The Rule 45 Subpoena requires disclosure of privileged or other protected information.
3. The Rule 45 Subpoena subjects MercyCare to undue burden.
4. The Rule 45 Subpoena subjects MercyCare to undue expense.
5. The Rule 45 Subpoena requires disclosure of a trade secret or other confidential business information.

6. The Rule 45 Subpoena contains requests that are so vague and ambiguous that it is unreasonable or even impossible for MercyCare to comply.

MercyCare asks that this Honorable Court enter an Order denying the production of the requested subpoena and further requests this Honorable Court to enter an Order to quash the Rule 45 Subpoena and/or allow MercyCare Insurance to further brief and argue this issue before this Court.

Respectfully submitted,

MercyCare Insurance Company

BY: s/ Lindsay Renier

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