

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

ASHLEE and RUBY HENDERSON, )  
a married couple and L.W.C.H., )  
by his parent and next friend )  
Ruby Henderson; )  
NICOLE and JENNIFER SINGLEY, )  
a married couple and UNBORN BABY DOE, )  
by his expectant mother and next friend, )  
Jennifer Singley; and, )  
ELIZABETH "NICKI" and TONYA BUSH-SAWYER, )  
a married couple and I.J.B. a/k/a I.J.B-S )  
by his parent and next friend Nicki Bush-Sawyer; )  
LYNDSEY and CATHY BANNICK, a married couple )  
and H.N.B. by his parent and next friend, )  
Lyndsey Bannick; CALLE and SARAH JANSON and )  
Unborn Baby Doe by his/her next friend and )  
mother -to-be Calle Janson; NIKKOLE )  
MCKINLEY-BARRETT and DONNICA BARRETT, a )  
married couple and G.R.M.B., )  
by his mother and next friend, Donnica Barrett )

Plaintiffs, )

-vs- )

DR. JEROME M. ADAMS, in his official capacity as )  
Indiana State Health Commissioner; )  
DR. JEREMY P. ADLER, in his official capacity as )  
Health Officer for the Tippecanoe County Health )  
Department; CRAIG RICH, in his official capacity as )  
Administrator of the Tippecanoe County Health )  
Department; GLENDA ROBINETTE, Vital Records )  
Registrar, Tippecanoe County Health Department )  
PAM AALTONEN, RN, DR. THOMAS C. PADGETT, )  
THOMETRA FOSTER, KAREN COMBS, )  
KATE NAIL, RN, DR. JOHN THOMAS and )  
DR. HSIN-YI WENG, all in their official capacities )  
as members of the Tippecanoe County )  
Board of Health; DR. VIRGINIA A. CAINE, in her )  
official capacity as Director and Health Officer )  
of the Marion County Health Department; )  
DARREN KLINGLER, Administrator, Vital Records, )  
Marion County Health Department; )

Cause No:  
1:15-CV-220 TWP-MJD



hereby provide their Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

These Initial Disclosures are provided based on information that is reasonably available to the Marion County Defendants at this time and at this state of the proceedings. As additional information becomes available, the Marion County Defendants reserve the right to supplement or amend these Initial Disclosures, and/or to use documents, witnesses or information not described herein:

**A. Individuals likely to have discoverable information:**

1. Dr. Virginia Caine  
Health and Hospital Corporation of Marion County  
3838 North Rural Street  
Indianapolis, Indiana 46205
2. Darren Klingler  
Health and Hospital Corporation of Marion County  
3838 North Rural Street  
Indianapolis, Indiana 46205

Subject matters: Facts relating to, among other things, (1) the events surrounding the allegations described in Plaintiffs' Amended Complaint involving the issuance of birth certificates for children either born or scheduled to be born in Marion County hospitals; (2) HHC's discretion to violate state statutes that currently require Plaintiffs to petition the court to add a non-biological parent to a child's birth certificate; and (3) HHC's policies regarding implementation of responsibilities designated by statute.

**B. Documents supporting defenses**

1. HHC's policies and procedures relating to the issuance of birth certificates;
2. Documents relating to Plaintiffs' allegations that HHC's employees and trustees unconstitutionally deprived non-biological same-sex parents of the opportunity to be included on a birth certificate without requesting permission from the court;
3. Records regarding the identification and actions of individuals employed by HHC who assisted Plaintiffs during any stage of Plaintiffs' respective pregnancies, and who communicated with Plaintiffs regarding the birth certificate requirements in Indiana;

4. Documents relating to any damages Plaintiffs are claiming in this action;
5. Documents relating to any mitigation of Plaintiffs' alleged damages;
6. Transcripts of any depositions taken in this action, with any exhibits thereto;
7. Any documents produced or identified by any party in discovery;
8. Any documents used by any party in connection with pre-trial motions;
9. Any documents identified on any initial disclosures or preliminary exhibit lists served and/or filed by any party; and
10. Any documents necessary for purposes of impeachment or rebuttal.

**C. Damages**

1. Not applicable.

**D. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

1. Not applicable.

Dated: June 12, 2015

/s/ Anna M. Konradi

A. Scott Chinn (No. 17903-49)  
Anne K. Ricchiuto (No. 25760-49)  
Anna M. Konradi (No. 30714-06)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2015, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to counsel of record for all parties.

/s/ Anna Konradi