

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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DR. SABINA BURTON

Plaintiff,

-vs-

Case No: 14-CV-274

BOARD OF REGENTS OF THE UNIVERSITY  
OF WISCONSIN SYSTEM, et al

Defendants.

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DEFENDANTS' RESPONSE TO PLAINTIFF'S FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS

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Defendants Board of Regents of the University of Wisconsin System,  
Elizabeth Throop and Thomas Caywood respond as follows to Plaintiff's first  
set of discovery:

**INTERROGATORIES**

**INTERROGATORY NO. 1:** For the period January 2009 to the  
present identify all persons employed as faculty in the criminal justice  
department at UW Platteville and for each person provide the following  
information:

- a. Date of hire and date of termination, if applicable;

- b. Positions held (e.g. whether assistant, associate, adjunct or full professor, lecturer or instructor) and dates in each position;
- c. Whether tenured and, if so, the date tenure was awarded;
- d. Gender;
- e. Annual salary and all salary increases including the date of each increase and the reasons therefore;
- f. Annual overload pay and the reasons therefore;
- g. Committee assignments (e.g. search and screen, curriculum, CRST etc.) including the date of each assignment and whether it included an appointment as chair;
- h. Course and/or teaching assignments for the fall, spring and summer terms;
- i. DRB evaluations and/or Recommendations for Reappointment or Tenure;
- j. Release time awarded to work on grant opportunities or other projects and dates of the release.

**DEFENDANTS' RESPONSE:** Defendants OBJECT on the ground that this interrogatory contains multiple parts and is actually ten distinct interrogatories. Defendants OBJECT that these interrogatories are overly broad and unduly burdensome and vague as to time period. Defendants OBJECT to interrogatory "i" because it is not a question that can be

responded to. Please see employee personnel files available for inspection at a mutual agreeable time at the Department of Justice.

**INTERROGATORY NO. 2:** For the time period covering the 2012-2013 academic year describe in detail defendant's policies and procedures governing student complaints of sexual harassment at UW Platteville and identify all related documents.

**DEFENDANTS' RESPONSE:** Student complaints of sexual harassment, if they involve a student and an employee, are investigated by Human Resources, while student-on-student harassment is handled by the Dean of Students. Please refer to the UW-Platteville Faculty and Staff Employee Handbook, Policy and Procedures regarding discrimination and harassment, available on the Internet at: <http://www.uwplatt.edu/employee-handbook/uw-platteville-policy-and-procedures-regarding-discrimination-and-harassment>.

**INTERROGATORY NO. 3:** Describe in detail all actions taken by the Board to investigate, remedy and/or address the student complaint of sexual harassment and/or inappropriate behavior by Dr. Gibson made on or about October 2013 and identify all related documents.

**DEFENDANTS' RESPONSE:** The Board of Regents did not investigate the alleged sexual harassment/inappropriate behavior by Dr. Gibson. The Complaint was brought to the attention of the Human Resources Dept. at UW Platteville. Jeanne Durr investigated it. Durr is no

longer employed by UW Platteville. Dean Throop met with Gibson, Caywood, and Durr on October 16 to investigate and verbally reprimand Gibson for his poor judgment. UW Platteville administration learned Gibson's action in giving the student the note was intended to illustrate a "breach experiment" which is a method to examine people's reactions to violations of commonly accepted social rules. Caywood, within hours of learning of the student complaint, discussed the matter with Gibson. Caywood ordered Gibson to email everyone in class to explain the purpose of the breach experiment and apologize to students. He did this in an email dated October 11, 2012.

**INTERROGATORY NO. 4:** Describe in detail all actions taken by the Board to investigate, remedy and/or address plaintiff's complaint to Dean Throop that Dr. Caywood was retaliating against her for her involvement in the student complaint and discriminating against her on the basis of her sex with respect to committee assignments and other career advancement opportunities made on or about December 2013 and identify all related documents.

**DEFENDANTS' RESPONSE:** The Board of Regents did not investigate Burton's complaint—sometime around December 2012 and/or January 2013 that Dr. Caywood was retaliating against her. Burton has made numerous complaints to Dr. Throop about a variety of different issues. Dean Throop does not recall a specific complaint of retaliation or sex discrimination in that time period and does not recall conducting any

investigation into the matter. However, Burton did complain about and email Caywood sent to various faculty in which Burton feels Caywood called her out. Burton also complained about the way the Gibson complaint was handled. Dean Throop told Caywood he should not have sent the email. Jeanne Durr told Caywood that Burton handled the student complaint about Gibson appropriately and instructed him to cease further communication about how she reported the incident. Durr and Throop continued to meet with Burton to discuss her concerns. At some point, Burton was advised she could file a grievance against Caywood.

**INTERROGATORY NO. 5:** Identify all complaints (both formal and informal) by current or former employees of defendant Board regarding any sexually discriminatory and/or harassing behavior by Dr. Caywood and describe in detail the substance of each complaint and identify all related documents.

**DEFENDANTS' RESPONSE:** Cheryl Banachowski-Fuller complained about Caywood because as head of the on-line program, she wanted to report directly to the dean instead of the department chair. Throop and Caywood are not aware of any complaints of sex discrimination or sexual harassment other than Burton's.

**INTERROGATORY NO. 6:** For each complaint identified in response to Interrogatory No. 5, above, describe in detail all actions taken by the Board to investigate, remedy and/or address the discriminatory and/or harassing

behavior including any disciplinary action imposed on Dr. Caywood and identify all related documents.

**DEFENDANTS' RESPONSE:** Fuller was allowed to report to the dean.

**INTERROGATORY NO. 7:** Describe in detail the complete factual basis for the statement that “[a]ll decisions related to pay were determined by non-gender based reasons” as set forth in paragraph 7 of defendant’s affirmative defenses (Answer, 6/20/14) and, in particular, describe in detail each and every non-gender based reason plaintiff was and/or is being paid less than Aric Dutelle, Lorne Gibson and Pat Solar.

**DEFENDANTS' RESPONSE:** Defendant is in the process of gathering salary records and will supplement this request for information shortly. Professor salaries may be based on market, time of hire, negotiations, offers from other institutions, prior experience, prior teaching experience, available funds, grants, additional duties, and other reasons. Solar's starting salary with UW Platteville was based in part on his 30 years of experience in law enforcement, including nearly 15 years of supervisory duties as administrative commander or Chief of Police, and his Ph.D., in Political Philosophy from Northern Illinois University, which provided important perspectives on the liberal arts mission of the University. Please also see personnel files, being produced. Discovery is on-going.

**INTERROGATORY NO. 8:** Describe in detail all actions taken by the Board to implement the Complaints and Grievances Committee's recommendation to Chancellor Shields that some action "be taken to remedy the harm done to Dr. Burton's professional reputation" as stated in the Committee's memorandum to Chancellor Shields dated July 10, 2013 at p. 2 and identify all related documents. If no action was taken, describe in detail each and every reason why no action was taken.

**DEFENDANTS' RESPONSE:** No action was taken because Burton misrepresented herself as a cyber-security expert and suggested UW Platteville had a cyber-security program where none existed.

**INTERROGATORY NO. 9:** Identify all courses to which Dr. Caywood was referring in his letter to plaintiff dated January 24, 2013 (attached as Exhibit A) when he stated that the department "got courses passed through the appropriate curriculum committees before offering a single course" and provide the date when each course was approved by the committee and identify all related documents.

**DEFENDANTS' RESPONSE:** Following are courses with the semester they began. Approvals would generally have occurred the previous semester. Discovery is on-going for the dates that the courses were approved through the Curriculum committees. Records relating to creation of the FI major and courses are ten years old. Discovery is on-going to locate records detailing when each course was approved through the department and

curriculum committees. Note that CJ courses may have recently been renumbered to "FI". Renumbering and approval of the FI major was approved by UUCC December 1, 2010# 10-59 to 10-73; the FI minor was approved October, 2006 by UUCC# 06-18.

CJ 1330 "Intro to Crime Scene Investigation" Fall 2004

CJ 2320 "Fingerprint, Classification and Development" Spring 2005; new course approved March 3, 2004 by UUCC#03-40

CJ 2420 "Evidence Collection and Preservation" Spring 2005; new course approved March 3, 2004 by UUCC#03-39

CJ 2520 "Crime Scene Processing" Spring 2006; unable to locate approval paperwork at this time; discovery is on-going

CJ 3120 "Investigative Photography" Spring 2006; New course approved Mar 3, 2005 by UUCC

CJ 4020 "Courtroom Testimony" Spring 2006; new course approved Dec. 1, 2010 by UUCC#10-70

FI 4920 "Senior Seminar"; New course approved Dec 1, 2010 by the UUCC #10-73

**INTERROGATORY NO. 10:** For each course identified in response to Interrogatory No. 9, above, state whether departmental approval was obtained for the course and, if so, provide the date and describe the process by which approval was obtained and identify all related documents.

**DEFENDANTS' RESPONSE:** Around 2003 – 2004, the CJ Department elected to create a Forensic Investigation curriculum and hired Aric Dutelle to create the program. Courses were developed and approved by faculty in the department. Once a course is developed within a department it must get approval from the College Curriculum Committee and the University Undergraduate Curriculum Committee (UUCC). Please also see response to Interrogatory # 9 and documents produced regarding the UUCC. The Criminal Justice Department curriculum committee was created and approved by Departmental vote on March 2, 2011.

Prior to the creation of the Departmental Curriculum Committee there was not established procedure for the development of a new course or to modify an existing course. The department chair was involved to help fill out the documents for approval by the College of LA&E curriculum committee which forwarded to document to the University's Undergraduate Curriculum Committee (UUCC) for approval and inclusion to the University's undergraduate catalog.

**INTERROGATORY NO. 11:** Describe in detail all communications both written and oral between and among Dr. Caywood, Dean Throop, Dr. Nimocks-Den Herder, Chancellor Shields and/or any other managerial employee of UW Platteville regarding the \$7,000 Innovation and Investment Award from AT&T that was awarded to plaintiff and identify all related documents.

**DEFENDANTS' RESPONSE:** Defendants OBJECT that this request is overly broad and unduly burdensome as to "and other managerial employee of UW Platteville." Subject to and without waiving this objection, Caywood brought the AT&T press release to Throop when he saw it. There was a variety of email communications around December 2012 and January 2013 between some of these individuals and the plaintiff. The emails are being produced and are available for inspection with the defendants' counsel.

**INTERROGATORY NO. 12:** Describe in detail all communications both written and oral between and among Dr. Caywood, Jeanne Durr, Dean Throop, Dr. Nimocks-Den Herder, Dr. Shane Drefcinski, Chancellor Shields and/or any other managerial employee of UW Platteville regarding the grievance plaintiff filed against Dr. Caywood with the Complaints and Grievances Committee and identify all related documents.

**DEFENDANTS' RESPONSE:** Defendants OBJECT that this request is overly broad and unduly burdensome as to "and other managerial employee of UW Platteville." Defendants OBJECT to the extent this interrogatory seeks information protected by attorney client privilege and are not producing any communications between UW Platteville administration and UW system legal counsel. Subject to and without waiving these objections, emails are being produced and are available for inspection with the defendants' counsel. Caywood recalls speaking with someone in Human Resources about the grievance procedure.

**INTERROGATORY NO. 13:** Describe in detail all communications both written and oral between and among Dr. Caywood, Dean Throop, Dr. Nimocks-Den Herder, Chancellor Shields and/or any other managerial employee of UW Platteville regarding the decision to appoint Dr. Michael Dalecki as interim chair of the criminal justice department and identify all related documents.

**DEFENDANTS' RESPONSE:** Defendants OBJECT that this request is overly broad and unduly burdensome as to "and other managerial employee of UW Platteville." Subject to and without waiving this objection, Caywood suggested Dalecki for interim chair in a meeting with Nimocks-Den Herder and Throop. Caywood spoke with Nimocks-Den Herder about the procedure used to appoint Dalecki. There were some meetings with Dean Throop and others regarding the interim appointment and there were some emailed communications. The emails and other documents are being produced and are available for inspection with the defendants' counsel.

**INTERROGATORY NO. 14:** Describe in detail all communications both written and oral between and among Dr. Caywood, Dean Throop, Dr. Nimocks-Den Herder, and any representative of AT&T regarding the \$7,000 Innovation and Investment Award from AT&T that was awarded to plaintiff and identify all related documents.

**DEFENDANTS' RESPONSE:** See response to Interrogatory 11.

Dated: July 17, 2015.

As to responses:

\_\_\_\_\_  
Elizabeth Throop

Subscribed and sworn to before me  
this \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Notary Public, State of Wisconsin  
My Commission: \_\_\_\_\_

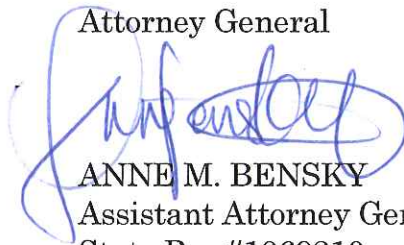
\_\_\_\_\_  
Thomas Caywood

Subscribed and sworn to before me  
this \_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
Notary Public, State of Wisconsin  
My Commission: \_\_\_\_\_

As to objections:

BRAD D. SCHIMEL  
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## **REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 34 plaintiff requests that defendant produce the following documents:

**REQUEST NO. 1:** Any and all documents defendant identified and/or relied upon in responding to plaintiff's interrogatories, above.

**RESPONSE:** Relevant documents will be made available for inspection by defendants' Counsel.

**REQUEST NO. 2:** Any and all documents defendant contends support any of its defenses to the complaint, including any affirmative defense asserted in its answer to the complaint.

**RESPONSE:** Counsel for defendants OBJECT to this request on the grounds that it is overly broad, vague, and requires speculation in order to respond.

**REQUEST NO. 3:** All payroll records or other documents reflecting regular salary, overload pay and all salary increases for each person identified in response to Interrogatory No. 1, above.

**RESPONSE:** Counsel for defendants OBJECT to this request to the extent it has no temporal limit. Subject to and without waiving this objection, a copy of the payroll records reflecting regular salary, overload pay and all salary increases for each person identified in response to Interrogatory No. 1, above will be made available for inspection by defendants Counsel.

**REQUEST NO. 4:** All documents reflecting committee assignments (e.g. search and screen, curriculum, CRST etc.) for each person identified in response to Interrogatory No. 1, above, for the period January 2009 to the present.

**RESPONSE:** No documents responsive to this request were found as committee assignment records are not maintained in a central location. Documents reflecting committee assignments are generally maintained in the records of the committee or individuals on the committee. Defendants reserve the right to supplement their response as information becomes available.

**REQUEST NO. 5:** All documents reflecting course and/or teaching assignments for the spring, fall and summer terms for each person identified in response to Interrogatory No. 1, above, for the period January 2009 to the present.

**RESPONSE:** A copy of documents reflecting course and/or teaching assignments for the spring, fall and summer terms for each person identified in response to Interrogatory No. 1, above, for the period January 2009 to the present will be made available for inspection by defendants Counsel.

**REQUEST NO. 6:** All DRB evaluations and Recommendations for Reappointment or Tenure for each person identified in response to Interrogatory No. 1, above, for the period January 2009 to the present.

**RESPONSE:** A copy of DRB evaluations and Recommendations for Reappointment or Tenure for persons identified in response to Interrogatory No. 1, above, for the period January 2009 to the present, that are in the possession, custody or control of UW-Platteville or the individual defendants, will be made available for inspection by defendants Counsel.

**REQUEST NO. 7:** All documents reflecting release time awarded to work on grant opportunities or other projects for each person identified in response to Interrogatory No. 1, above, for the period January 2009 to the present.

**RESPONSE:** A copy of documents reflecting release time awarded to work on grant opportunities or other projects for each person identified in response to Interrogatory No. 1, above, for the period January 2009 to the present will be made available for inspection by defendants Counsel.

**REQUEST NO. 8:** All documents that support the contention in Dr. Caywood's letter to plaintiff dated January 24, 2013 (attached as Exhibit A) that Dr. Butts supported the development of the Forensics Investigation program and "allocated the FTE (at that time) and ensured funding for textbooks, classroom equipment and supplies."

**RESPONSE:** A copy of documents reflecting support of the FI program will be made available for inspection by defendants Counsel. Those documents may or may not directly reflect Dr. Butts.

**REQUEST NO. 9:** All documents that support the contention in Dr. Caywood's letter to plaintiff dated January 24, 2013 (attached as Exhibit A) that the Forensics Investigation program "had the overwhelming support of the department", that "department chair Joe Lomax was involved in every step of the process" and that the department "convened advisory board meetings to get input from those in the field as to the need and type of courses necessary to benefit students going into the field."

**RESPONSE:** It has been over ten years since the inception of the FI program. Documents reflecting support for the FI program, that are in the possession, custody or control of UW-Platteville or the individual defendants, are being produced herewith.

**REQUEST NO. 10:** All documents that support the contention in Dr. Caywood's letter to plaintiff dated January 24, 2013 (attached as Exhibit A) that the department "created a position description, created a search and screen committee and then conduct[ed] a nation-wide search."

**RESPONSE:** It has been over ten years since the inception of the FI program. Documents reflecting support for the FI program, that are in the possession, custody or control of UW-Platteville or the individual defendants, are being produced herewith.

**REQUEST NO. 11:** All documents that support the contention in Dr. Caywood's letter to plaintiff dated January 24, 2013 (attached as Exhibit

A) that the department “got courses passed through the appropriate curriculum committees before offering a single course.”

**RESPONSE:** It has been over ten years since the inception of the FI program. Documents reflecting support for the FI program, that are in the possession, custody or control of UW-Platteville or the individual defendants, are being produced herewith.

**REQUEST NO. 12:** All documents that support the allegations in paragraph 7 of defendant’s affirmative defenses (Answer, 6/20/14) that all decisions related to pay were determined by non-gender based reasons.

**RESPONSE:** Counsel for defendants OBJECT to this request on the grounds that it is overly broad, vague, and requires speculation in order to respond.

**REQUEST NO. 13:** All handbooks, personnel policies, procedures, manuals, and other documents describing in any way defendant’s policies and procedures governing complaints of sex discrimination, sexual harassment and/or retaliation for complaining about sex discrimination or sexual harassment from January 2009 to the present including all supervisory or procedure manuals that may or may not be disseminated to employees.

**RESPONSE:** A copy of documents describing policies and procedures governing complaints of sex discrimination, sexual harassment and/or retaliation for complaining about sex discrimination or sexual harassment

from January 2009 to the present will be made available for inspection by defendants Counsel.

**REQUEST NO. 14:** All handbooks, personnel policies, procedures, manuals, and other documents describing in any way defendant's policies and procedures governing faculty salaries at UW Platteville and pay adjustments and/or salary increases from January 2009 to the present including all supervisory or procedure manuals that may or may not be disseminated to employees.

**RESPONSE:** A copy of a documents describing policies and procedures governing faculty salaries at UW Platteville and pay adjustments and/or salary increases from January 2009 to the present will be made available for inspection by defendants Counsel.

**REQUEST NO. 15:** Plaintiff's complete personnel records, including plaintiff's official personnel file, employment application and all documents and writings (including drafts) that were used to determine plaintiff's qualifications for employment, starting pay, pay increases and/or promotions.

**RESPONSE:** A copy of plaintiff's Personnel File and Search File will be made available for inspection by defendants Counsel.

**REQUEST NO. 16:** All notes, memoranda, emails or other writings taken regarding plaintiff's hiring, job performance and written

and/or verbal requests for promotion and/or pay increases and/or pay adjustments.

**RESPONSE:** Counsel for defendants OBJECTS to this request on the grounds that it is overly broad and burdensome. Subject to and without waiving this objection, a copy of plaintiff's Personnel File and Search File will be made available for inspection by defendants Counsel.

**REQUEST NO. 17:** All job descriptions applicable to plaintiff during her employment.

**RESPONSE:** A copy of plaintiff's Personnel File and Search File, which includes job descriptions applicable to plaintiff, will be made available for inspection by defendants Counsel.

**REQUEST NO. 18:** All documents identified in defendant's Rule 26 Initial Disclosures.

**RESPONSE:** Counsel for defendants OBJECTS to this request on the grounds that it is overly broad, burdensome, and unspecific.

**REQUEST NO. 19:** For the period January 2009 to the present all documents that evidence any steps taken by defendant to guard against, prevent, remedy or uncover any type of gender discrimination or bias in connection with its hiring, promotion or compensation decisions or policies at UW Platteville.

**RESPONSE:** Counsel for defendants OBJECTS to this request on the grounds that it is overly broad and vague. Subject to and without waiving

this objection, UW Platteville's policies regarding discrimination are attached to the interrogatories as Exhibit A. Additional documents are available for inspection.

**REQUEST NO. 20:** For the period January 2009 to the present all documents constituting or reflecting any policies or programs concerning affirmative action, diversity or the recruitment, hiring or promotion of women to faculty positions at UW Platteville.

**RESPONSE:** Counsel for defendants OBJECTS to this request on the grounds that it is overly broad and vague as to the meaning of "constituting or reflecting." Subject to and without waiving this objection, UW Platteville's policies and regarding affirmative action will be made available for inspection by defendants Counsel. See also anti-discrimination policy.

**REQUEST NO. 21:** For the period January 2009 to the present all studies, analyses and/or self-evaluations conducted by defendant with respect to faculty compensation and pay equity at UW Platteville.

**RESPONSE:** No such document exists. Defendants reserve the right to supplement their response as information becomes available.

**REQUEST NO. 22:** For the period January 2009 to the present all consolidated EEO-1 reports and individual business area, business unit, or facility EEO-1 reports or similar workforce profiles submitted to the EEOC, OFCCP or any state government agency as well as documents

describing or explaining the methods and techniques used in compiling, editing, modifying or updating such reports.

**RESPONSE:** A copy of EEO-1 reports and individual business area, business unit, or facility EEO-1 reports in the possession, custody, or control of UW-Platteville or the individual defendants will be made available for inspection by defendants Counsel.

**REQUEST NO. 23:** For the period January 2007 to the present any OFCCP investigation, report or correspondence with the OFCCP concerning any investigation or inquiry by it of the treatment of female faculty and/or faculty compensation at UW Platteville including any internal memoranda, or notes concerning such investigation, report or correspondence.

**RESPONSE:** No such document exists. Defendants reserve the right to supplement their response as information becomes available.

**REQUEST NO. 24:** For the period January 2009 to the present all minutes, agendas, or reports of or to the CRST concerning faculty compensation in the department of criminal justice.

**RESPONSE:** A copy of CRST reports concerning faculty compensation in the department of criminal justice from January 2009 to the present will be made available for inspection by defendants Counsel. No minutes or agendas exist. Defendants reserve the right to supplement their response as information becomes available.

**REQUEST NO. 25:** For the period January 2009 to the present all documents that refer to any proposals, whether by officer, employee, or otherwise, for glass ceiling reviews or concerning gender discrimination in general.

**RESPONSE:** No such document exists. Defendants reserve the right to supplement their response as information becomes available.

**REQUEST NO. 26:** For the period January 2009 to the present all minutes of criminal justice department and/or faculty meetings.

**RESPONSE:** A copy of minutes from criminal justice department and/or faculty meetings from January 2009 to the present that are in the possession, custody, or control of UW-Platteville or the individual defendants will be made available for inspection by defendants Counsel.

**REQUEST NO. 27:** All notes, memoranda, emails or other writings taken regarding plaintiff's grievance against Dr. Caywood filed with the Complaints and Grievances Committee.

**RESPONSE:** A copy of the documents regarding plaintiff's grievance against Dr. Caywood filed with the Complaints and Grievances Committee will be made available for inspection by defendants Counsel.

**REQUEST NO. 27:** All notes, memoranda, emails or other documents regarding plaintiff's grievance against Dr. Caywood filed with the Complaints and Grievances Committee.

**RESPONSE:** A copy of the documents regarding plaintiff's grievance against Dr. Caywood filed with the Complaints and Grievances Committee will be made available for inspection by defendants Counsel.

**REQUEST NO. 28:** All notes, memoranda, emails or other documents regarding plaintiff's grievance against Dean Throop filed with the Complaints and Grievances Committee.

**RESPONSE:** A copy of the documents regarding plaintiff's grievance against Dean Throop filed with the Complaints and Grievances Committee will be made available for inspection by defendants Counsel.

**REQUEST NO. 29:** For the period January 2009 to the present all contracts, job offers, appointment letters or letters of reappointment issued to each faculty member identified in response to Interrogatory No. 1, above.

**RESPONSE:** A copy of plaintiff's Personnel File of each faculty member identified in response to Interrogatory No. 1, above will be made available for inspection by defendants Counsel.

**REQUEST NO. 30:** All files (other than plaintiff's official personnel file) compiled and/or maintained by Dean Throop, Dr. Caywood, Dr. Dalecki, Dr. Nimocks-Den Herder, Jeanne Durr, Dr. John Lohmann, Dr. Jennifer DeCoste and/or Chancellor Shields, regarding any aspect of plaintiff's employment at UW Platteville and/or her grievances against Dr. Caywood and/or Dean Throop.

**RESPONSE:** A copy of any files (other than plaintiff's official personnel file) compiled and/or maintained by Dean Throop, Dr. Caywood, Dr. Dalecki, Dr. Nimocks-Den Herder, Dr. John Lohmann, Dr. Jennifer DeCoste and/or Chancellor Shields, will be made available for inspection by defendants Counsel. Jeanne Durr no longer works at UW-Platteville.

**REQUEST NO. 31:** All files or other documents maintained and/or compiled by the Complaints and Grievances Committee and/or individual members of the Committee regarding plaintiff's grievances against Dr. Caywood and/or Dean Throop.

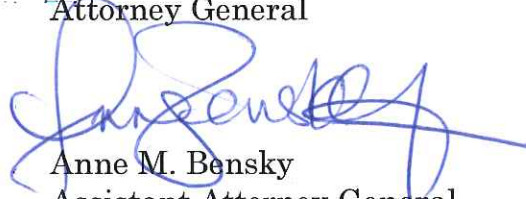
**RESPONSE:** A copy of the documents maintained and/or compiled by the Complaints and Grievances Committee and/or individual members of the Committee regarding plaintiff's grievances against Dr. Caywood and/or Dean Throop will be made available for inspection by defendants Counsel.

**REQUEST NO. 30:** All written communications and/or other documents related to the \$7,000 Innovation and Investment Award from AT&T that was awarded to plaintiff.

**RESPONSE:** A copy of all written communications and/or other documents related to the \$7,000 Innovation and Investment Award from AT&T will be made available for inspection by defendants Counsel.

Dated this 17<sup>th</sup> day of July 2015.

BRAD D. SCHIMEL  
Attorney General



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