

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

DR. SABINA BURTON

Plaintiff,

-vs-

Case No: 14-CV-274

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

Defendants.

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

Defendants hereby supplement their responses to Plaintiff's first set of interrogatories and document requests. Certain documents are being emailed herewith, and other documents are being sent on a CD-Rom via U.S. Mail.

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;

DEFENDANTS' SUPPLEMENTAL RESPONSE: Appointment letters and retirement/termination paperwork, where available, are being produced on a CD-Rom.

- b. Positions held (e.g. whether assistant, associate, adjunct or full professor, lecturer or instructor) and dates in each position;

DEFENDANTS' SUPPLEMENTAL RESPONSE: Appointment letters and promotion letters, where available, are being produced on a CD-Rom.

- c. Whether tenured and, if so, the date tenure was awarded;

DEFENDANTS' SUPPLEMENTAL RESPONSE: Tenure letters, where available, are being produced on a CD-Rom.

- d. Gender;

DEFENDANTS' SUPPLEMENTAL RESPONSE: Should be obvious based on names.

- e. Annual salary and all salary increases including the date of each increase and the reasons therefore;

DEFENDANTS' SUPPLEMENTAL RESPONSE: Salary letters are being produced on a CD-Rom; salary spreadsheets are being emailed.

- f. Annual overload pay and the reasons therefore;

DEFENDANTS' SUPPLEMENTAL RESPONSE: Overload teaching requests and approvals are being produced on a CD-Rom.

g. Course and/or teaching assignments for the fall, spring and summer terms;

DEFENDANTS' SUPPLEMENTAL RESPONSE: An excel spreadsheet containing all Criminal Justice courses offered Fall and Spring between Fall 2009 and Fall 2014 are being emailed herewith as an attachment.

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' SUPPLEMENTAL RESPONSE: Attached please find documents related to the UW System Prior Learning Credit Initiative grant that Caywood, Dutelle, and Gibson received from UW System/Lumina Foundation. This grant provided a temporary increase in base salary for Caywood, Dutelle, and Gibson, as reflected on their salary letters.

DOCUMENT REQUESTS

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.

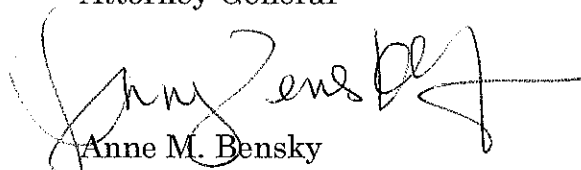
DEFENDANTS' SUPPLEMENTAL RESPONSE: Counsel for defendants OBJECT to this request to the extent it has no temporal limit. Subject to and without waiving this objection, a copy of the payroll records reflecting regular salary, overload pay and all salary increases for CJ faculty are being produced as an excel spreadsheet.

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.

DEFENDANTS' SUPPLEMENTAL RESPONSE: An excel spreadsheet containing all Criminal Justice courses offered Fall and Spring between Fall 2009 and Fall 2014 are being emailed herewith as an attachment.

Dated this 1st Day of October, 2015.

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