



STATE OF WISCONSIN  
DEPARTMENT OF JUSTICE

BRAD D. SCHIMEL  
ATTORNEY GENERAL

Andrew C. Cook  
Deputy Attorney General

17 W. Main Street  
P.O. Box 7857  
Madison, WI 53707-7857  
www.doj.state.wi.us

Katherine D. Spitz  
Assistant Attorney General  
spitzkd@doj.state.wi.us  
608/266-1001  
FAX 608/267-8906

October 6, 2015

Attorney Timothy Hawks  
Attorney Michelle Sumara  
Hawks Quindel S.C.  
222 E. Erie Street, Suite 210  
Milwaukee, WI 53202  
thawks@hq-law.com

Re: *Sabina Burton v. Bd. of Regents of University of Wisconsin*  
Western District Case No. 14-CV-0274

Dear Attorney Hawks:

Enclosed, please find Defendant's Second Set of Interrogatories and Requests for Production to Plaintiff. I will maintain the original in my file.

Sincerely,

Katherine D. Spitz  
Assistant Attorney General  
State Bar #1066375

KDS:jcp  
Enclosures

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

DR. SABINA BURTON,

Plaintiff,

v.

Case No. 14-CV-0274

BOARD OF REGENTS UNIVERSITY OF  
WISCONSIN, et al.,

Defendants.

---

DEFENDANTS' SECOND SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION TO PLAINTIFF

---

To: Sabina Burton  
c/o Attorneys Timothy Hawks and Michele Sumara  
Hawks Quindel S.C.  
222 E. Erie Street, Suite 210  
Milwaukee, WI 53202  
thawks@hq-law.com

You are hereby required to answer and serve upon Assistant Attorneys General Monica Burkert-Brist, Anne Bensky, and Katherine D. Spitz, attorneys for the Defendants, pursuant to Rules 33, and 34 Fed. R. Civ. P., answers to Defendant's Second Set of Interrogatories and Defendant's Request for Production of Documents, within thirty days after service upon you.

## INSTRUCTIONS & DEFINITIONS

1. If you refuse to answer any interrogatory or produce any document because of privilege, please provide a privilege log that includes all of the following: subject matter of communication/document, date of communication /document, names of all persons involved in the communication or names of all individuals who received the document, date of the communication/document, description of the communication/document; the statutory basis for the privilege.

2. "You" refers to the plaintiff, Sabina Burton, and anyone acting on your behalf.

3. You are expected to correctly apply the Federal Rules of Civil Procedure, specifically Rules 33 and 34, in answering this discovery.

4. You are expected to interpret the interrogatories and document requests using the ordinary meaning of words.

## INTERROGATORIES

1. Describe every fact to support your allegation that Dr. Dalecki issued a "gag order" forbidding colleagues in the Criminal Justice department from communicating with you, as alleged in Paragraph 152 of the Second Amended Complaint.

2. Describe every fact to support your allegation that Dr. Dalecki refused to participate in mediation as alleged in Paragraph 147 of the Second Amended Complaint.

3. Describe every fact to support your allegation that after April 14, 2014, Dr. Dalecki's demeanor toward you became hostile, as alleged in Paragraph 141 of the Second Amended Complaint.

4. List every instance in which you opposed sex discrimination in the workplace that you contend supports your claim for retaliation against any defendant.

5. List every detail of your discussion with Dr. Dalecki on October 17, 2013, including who was present and what each party said.

### REQUESTS FOR PRODUCTION

1. Produce each and every document regarding your requests to any defendant to teach an on-line course as part of your course load.

2. To the extent not previously produced, produce each and every physician recommendation related to any of the allegations in the Second Amended Complaint, including but not limited to the recommendation referred to in Paragraph 181 of the Second Amended Complaint.

3. Produce the "appeal findings" to which you refer in Paragraph 178 of the Second Amended Complaint.

4. Produce all documents that specify that you are to teach 25% of your load in on-line courses as referenced in Paragraph 151 of the Second Amended Complaint.

5. Produce all communications between you and Ron Jacobus related to any of the allegations in the Second Amended Complaint.

6. To the extent not previously produced, produce all documents referred to or relied upon in your responses to the above Interrogatories.

Dated October 6, 2015, in Madison, Wisconsin.

BRAD D. SCHIMEL  
Attorney General



KATHERINE D. SPITZ  
Assistant Attorney General  
State Bar #1066375

ANNE M. BENSKY  
Assistant Attorney General  
State Bar #1069210

MONICA BURKERT-BRIST  
Assistant Attorney General  
State Bar #1009882

Attorneys for the Defendants

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 266-1795 (AAG Burkert-Brist)  
(608) 264-9451 (AAG Bensky)  
(608) 266-1001 (AAG Spitz)  
(608) 267-8906 (Fax)  
burkert-bristm@doj.state.wi.us  
benskyam@doj.state.wi.us  
spitzkd@doj.state.wi.us