

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

Sabina Burton,

Plaintiff,

v.

Case No. 14--CV-274

University of Wisconsin Regents, et al,

Defendants.

DECLARATION OF ANNE M. BENSKY

I, **ANNE M. BENSKY**, declare pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the following is true and correct.

1. I am an Assistant Attorney General with the State of Wisconsin Department of Justice and am one of the attorneys representing the defendants in the above-captioned case.

2. This declaration is based on my personal knowledge.

3. On October 7, 2015, I attended the deposition of Dr. Michael G. Dalecki. A true and correct copy of the following exhibits from his deposition are attached hereto as marked as follows:

- Exhibit 37 is marked as **EXHIBIT YYY**;
- Exhibit 41 is marked as **EXHIBIT ZZZ**;
- Exhibit 42 is marked as **EXHIBIT AAAA**;
- Exhibit 54 is marked as **EXHIBIT BBBB**;

- Exhibit 56 is marked as **EXHIBIT CCCC**;
- Exhibit 60 is marked as **EXHIBIT DDDD**.

4. On July 23 and 24 and October 22, 2015, I attended the deposition of Dr. Sabina Burton, the plaintiff in this matter. A true and correct copy of the following exhibits from her depositions are marked as follows:

- Exhibit 2 is marked as **EXHIBIT EEEE**;
- Exhibit 3 is marked as **EXHIBIT FFFF**;
- Exhibit 8 is marked as **EXHIBIT GGGG**;

5. A true and correct copy of Dr. Burton's EEOC charge dated October 30, 2014, as received by the defendants, is attached as **EXHIBIT HHHH**.

6. On August 21, 2015, I attended the deposition of Dr. Thomas Caywood. A true and correct copy of the following exhibits from his deposition are marked as follows:

- Exhibit 20 is marked as **EXHIBIT IIII**.

7. A true and correct copy of the following documents produced by the plaintiff during the course of this litigation and the relevant portions of which constitute admissions by a party opponent, are marked as follows:

- October 12, 2014 Burton email exchange with G. Daniel Fairchild is attached as **EXHIBIT JJJJ**;
- October 22, 2014 Burton email to John Lohman is attached as **EXHIBIT KKKK**;

- October 11, 2014 Burton email to Mittie Nimocks Den Herder is attached as **EXHIBIT LLLL**.

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY THAT THE STATEMENTS IN THIS DECLARATION ARE TRUE AND CORRECT AND BASED UPON MY PERSONAL KNOWLEDGE.

Dated: November 10, 2015

/s/Anne M. Bensky

ANNE M. BENSKY