



STATE OF WISCONSIN
DEPARTMENT OF JUSTICE

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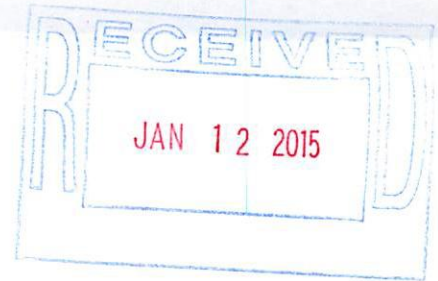
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January 9, 2015

VIA U.S. Mail

Timothy E. Hawks
Hawks Quindel, S.C.
PO Box 442
Milwaukee, WI 53201-0442



Re: *Burton v. Bd. of Regents et al*
WIWD 14-CV-274

Dear Tim:

Thank you for your phone call yesterday. This letter is to confirm our agreement to exchange outstanding discovery on or before February 4, 2015. We also discussed an extension for expert disclosures. You indicated that your expert(s) would opine on matters related to damages only and would not address liability. The defendants will agree to extend the deadline for the disclosure of damage experts and their reports to mid-March for the plaintiff and mid-May for the defendants. You and I agreed during our telephone conversation that the naming of damage experts should not affect the April 13, 2015 summary judgment deadline; however, if the plaintiff's report(s) involve matters that will require the defendants to include responsive expert evidence for summary judgment purposes, we reserve the right to request a later summary judgment date to accommodate.

We also discussed how to handle the voluminous document responses. We will make the responsive documents available for inspection at DOJ. Please let us know if you think you can narrow Attorney Kennelly's document requests. We will also share our document index with you, but I can't guarantee the index will be ready before February 4 due to our paralegal's schedule the next few weeks.

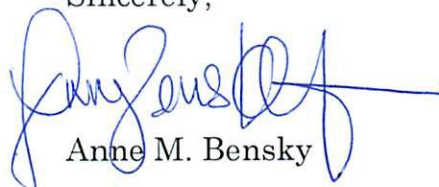
EXHIBIT A

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Lastly, we will want to depose Dr. Burton either the last week in February or during the first two weeks in March. Please provide dates that you and your client are available. We will want to schedule a full day to allow seven hours of deposition. Please let us know who you would like to depose so we can work on dates with our clients.

Thank you for your cooperation and I look forward to working with you.

Sincerely,



Anne M. Bensky