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RECEIVED

June 18, 2015

JUN 22 2015

AAG Anne M. Bensky
Wisconsin Department of Justice
17 West Main Street
Madison, WI 53707-7857

WI DEPT OF JUSTICE
DIVISION OF LEGAL SERVICES

RE: *Burton v. Board of Regents*, Case no. 14-CV-274
Answers and Responses of Plaintiff to Defendants' First Set of Discovery

Dear Ms. Bensky:

Please find enclosed the following:

- Answers and Responses of Plaintiff to Defendants' First Set of Discovery;
- a CD of audio files A6, A6a;
- a flash drive of documents numbered Bates SB1-SB1374 and audio files A1-A5, A7-A16, A18, A20, A24, A26;
- Plaintiff's privilege log.

Very truly yours,
HAWKS QUINDEL, S.C.

A handwritten signature in black ink, appearing to read 'T. Hawks', is written over a horizontal line.

Timothy E. Hawks
thawks@hq-law.com

TEH:kak

cc: Dr. Sabina Burton

Enc. As noted above





DOCUMENT REQUESTS

Document Request No. 1: Please produce a copy of any audio and/or video recording you took during a meeting that may have included Dean Elizabeth Throop, Vice Chancellor Jennifer deCoste, and Department Chair Mike Dalecki, which occurred on or about June 26, 2014.

Response: See audio (A) recording A3.

Document Request No. 2 Please produce a copy of any audio and/or video recording you took of any oral communication that included any of the following individuals: Dean Throop, Tom Caywood, Mike Dalecki, Jennifer deCoste, Chancellor Dennis Shields, Aric Dutelle, Lorne Gibson, Cheryl Banachowski-Fuller, Amy Nemmetz, Joe Lomax, Diana Johnson, Rex Reed, David Van Buren, Jeanne Durr, Mittie Nimocks Den-Herder, Shane Drefcinski, Mary Rose Williams, Jessica Erickson, Jim Jermaine, Paul Erickson, John Lohmann.

Plaintiff objects to this request on the ground that the term “communication” is vague and overbroad. Subject to and without waiving this objection, Plaintiff answers as follows:

Response: See the following audio recordings:

Meeting, Jan. 29, 2013, Dr. Burton, Dean Throop, Ms. Durr, A1
Meeting, Feb. 7, 2013, Dr. Burton and Ms. Durr, A2
DRB meeting, Jan.14, 2014, Dr. Burton, Mr. Dutelle, Dr. Caywood, Dr. Fuller, A4
DRB meeting, Oct. 15, 2013, Dr. Burton, Dr. Caywood, Dr. Fuller, Mr. Dutelle, Dr. Dalecki A5
Grievance hearing, Apr. 12, 2013, Dr. Burton, Dr. Caywood, 5 committee members, Roger Burton, A6, A6a
Meeting, Aug. 8, 2013, Dr. Burton, Provost Den Herder, A7
Phone call, July 11, 2013, Dr. Burton, Chancellor Shields, A8
Meeting, Sept. 24, 2014, Dr. Solar, Dr. Stackman, Dr. Reed, Dr. Burton, A9
Department meeting, Aug. 29, 2014, with Dean Throop, A10
Department meeting, Aug. 29, 2014, A11
Meeting, Aug. 13, 2014, Dr. Burton, Ms. deCoste, Mr. Lohmann, A12
Grievance meeting, Dec. 2, 2013, Dr. Burton, Dean Throop, Dr. Den Herder, committee members, Roger Burton, A13, A13a, A13b
Dr Gibson's appeals hearing, Mar. 24, 2014, Dr. Gibson, Dr. Burton, Dr. Dalecki, Dean Throop, Dr. Caywood, Dr. Reed, Mr. Dutelle, board members, A14
Meeting, Oct. 15, 2014, Dean Throop, Dr. Zauke, Dr. Burton, A15
Meeting, Dec. 5, 2014, Dr. Reed, Dr. Zauche, student AL, Dr. Burton, A16
Meeting, Sept. 3 2014, Dr. Lomax, Dr. Burton, A18
Meeting, Oct. 12, 2014, Dr. Lomax, Dr. Burton, A20
Meeting, Oct. 31, 2014, Mr. Lohmann, Dr. Burton, A24
Meeting, Dec. 16, 2014, Dr. Lomax, Dr. Burton, A26

Document Request No. 3: All documents, including emails, diary entries, personal notes, letters, etc., relating to alleged instances of sex/gender discrimination that you experienced at UW Platteville.

Plaintiff objects to this request to the extent that it calls for documents that are protected by the attorney-client privilege and/or work product doctrine. Subject to and without waiving this objection, Plaintiff will produce the following documents.

Response: See Bates SB1-SB24; see also response to document request 15.

Document Request No. 4: All documents, including emails, diary entries, blogs, personal notes, letters, etc., relating to alleged instances of sex/gender discrimination that other female professors in the CJ department experienced at UW Platteville.

Response: See Bates SB25-SB32.

Burton v. Board of Regents, Case No. 14cv274 (W.D. Wis.)

Plaintiff's Privilege Log

Log #	Document No.	Date	Author	Recipient	Subject	Privilege or Doctrine
1	SB07 (partially redacted)	9/30/2014	Sabina Burton	Mary Kennelly	Compensation Analysis Team Agenda	Attorney-Client Privilege