

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

Exhibit 502

MIKAYLA MARIE LERETTE,

Plaintiff,

Case No: 25-CV-183

v.

THE CITY OF SUPERIOR, WISCONSIN,
In Their Individual Capacities
THOMAS CHAMPAIGNE
JOHN KIEL, JEFFREY HARRIMAN and
MICHELLE POPE,

Defendants.

**DEFENDANT CITY OF SUPERIOR'S RESPONSES TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO CITY OF SUPERIOR**

City of Superior, by their attorneys, Crivello, Nichols & Hall, S.C. responds to Plaintiff's first set of interrogatories as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify every person who participated in, had input into, or was consulted about any decision, action, or omission alleged in the Second Amended Complaint, including but not limited to: (a) the assignment of Plaintiff to the property room; (b) the imposition of light-duty restrictions on Plaintiff; (c) any scheduling, discipline, or investigation concerning Plaintiff's work hours or attendance; (d) the installation and use of any GPS or tracking device on Plaintiff's vehicle; and (e) the provision or denial of lactation accommodations. For each such

person, state their job title(s) and dates in that position, their role in the matter, and the substance of their involvement.

RESPONSE No. 1: Objection. Defendants object to this Interrogatory on grounds that it assumes the truth of the allegations set forth in the Second Amended Complaint. Defendants deny the accuracy and completeness of the allegations set forth in the Complaint and therefore are unable to identify any persons with knowledge of the events alleged therein. Defendants further object that the Interrogatory is compound and contains at least five separate inquiries for purposes of calculating the number of interrogatories served by Plaintiff.

Subject to and without waiving the objections:

- **Nicholas Alexander – Former Chief of Police from 1/01/2015-01/26/2024**
- **John Kiel – Assistant Chief of Police from 04/2020 – 12/2024**
- **Michelle Pope – Lieutenant from 09/07/2019-02/17/2025, Captain from 02/18/2025-12/07/2025, and Assistant Chief from 12/08/2025-present**
- **Jeffrey Harriman – Captain from 03/09/2024-11/16/2025 and Sergeant from 07/18/2020-03/08/2024 and 11/17/2025-present**
- **Thomas Champainge – Captain from 11/02/2015-03/08/2024.**

See also Dkts. 35-38.

INTERROGATORY NO. 2: Describe in detail the City's policies, practices, and procedures, in effect at any time from January 1, 2022, to the present, regarding:

- (a) light duty assignments for sworn officers;
- (b) assignment to the property room;

- (c) restrictions on carrying firearms, driving City vehicles, or leaving the station while on light duty;
- (d) timekeeping, attendance, and use of paid or unpaid leave for sworn officers; and
- (e) progressive discipline and internal investigations of sworn officers.

Identify all written policies, SOPs, directives, or labor agreements that relate to these topics.

RESPONSE No. 2: Objection. Defendants object to this Interrogatory on grounds that it is compound and overly broad. Further object that Interrogatory is vague as to the term “regarding.” Subject to and without waiving the objections, please see the attached polices bates labeled DEF 000316- 000329, 000335-000340, 000351-000359, 000363-000369-000371-000388, 000498-000500, 000554-000558, 001003-001011.

INTERROGATORY NO. 3: For the period January 1, 2017, to present, identify all sworn officers who were placed on temporary “light duty” status. For each such officer, state:

- (a) name;
- (b) dates of light duty;
- (c) reason for light duty (e.g., injury, medical condition, pregnancy, post-childbirth);
- (d) their assignment while on light duty;
- (e) whether they were permitted to carry a firearm;
- (f) whether they were permitted to drive a City vehicle;
- (g) whether they were permitted to leave the station during work hours; and
- (h) the identity of the supervisor(s) who made or approved these decisions.

RESPONSE No. 3: Objection. Defendants object to this Interrogatory on grounds that it is overly broad and not likely to lead to the discovery of admissible evidence, as a list of sworn officers who were placed on temporary “light duty” status over a period of nine

years is irrelevant to the parties' claims and defenses in this lawsuit and unduly burdensome to the Defendants. Furthermore, this request seeks information that is not proportional to the needs of the case concerning sworn officers and is otherwise an invasion into his/her privacy that is not proportionate to Plaintiff's claims. Defendants further object that the Interrogatory is compound. Subject to and without waiving the objections and in an effort to be responsive, please see a list of officers who have been on light-duty within the last five years:

- **Jeff Darst – 06/2021 – 07/2021**
- **Seth Noll - 09/2021 – 05/2022: Noll suffered a significant off-duty injury that caused him to be on light duty for several months. The patrol captain at the time, Paul Winterscheidt, had been PPO Noll's supervisor. However, PPO Noll was simply answering "name and number" calls at the desk each day and not doing any meaningful work. This continued for several months. Recognizing that PPO Noll needed some direction, then-Chief Nick Alexander appointed Pope as the supervisor responsible for Noll's light duty assignments. This assignment started in February, 2022 with Seth Noll. It was at that time Noll began spending his light duty time in the property room. Noll remained assigned to property until he returned to full duty in May, 2022.**
- **Brian Davis – 09/20/21 – 10/22/21: Didn't carry a gun. Not known what he did for an assignment.**
- **Kelsey Davis – 09/2022 – 01/2023: Davis had a couple of days light duty on August 24, 2021. Because her prognosis was yet unknown, she completed her work week on the 6:00pm – 6:00am schedule where she cleaned/organized the evidence processing**

room. Once Davis began a long-term light duty status the following week, she spent her entire light duty time in the property room.

- **Mikayla LeRette – 11/2022 – 01/23 and 09/24 – 01/25:** January of 2023 LeRette started in the property room with Kelsey Davis. Within a few workdays, her doctor's restrictions changed and prohibited her from being around drugs because she was nursing. She was reassigned and worked in the investigation bureau.
- **Amanda Mundell – 03/24 – 09/24:** Mundell assisted in the property room helping with evidence and assisting in a very lengthy audit of the property room. After that, and as her pregnancy progressed, she mainly assisted in investigations helping Detectives, taking "name and number" calls and assisting at the front desk in records.
- **Bill Lear – 08/24-09/24:** Sgt. Lear was off with an injury to his foot. He assisted with a cold case in addition to several duties and collateral assignments that he was still able to do on light duty.
- **Zach Pfistner – 07/24 – 10/24:** Pfistner had childcare issues and was allowed to work 4:00 PM – 2:00 AM. Due to his overnight hours, he was assigned to work on a cold case. The work was extensive and took months to finish. During that time, he also took "name and number" calls and assisted with a minimal amount of property work, due to his limited daytime hours of availability. In addition, he assisted with property/evidence organization and destruction.
- **Taylor Gaard – 8/24 – 1/25:** Gaard was on light duty upon learning she was pregnant. She had a health condition that seriously limited the amount/type of work she could do. She worked at the front desk and assisted in the investigations division.

- **Nick Eastman – 06/25 – 09/25:** Sgt. Eastman assisted in Property for the first 3-4 weeks of his light duty status. After that, he continued to work doing various projects assigned by Pope and working his assigned duties (quartermaster, K-9 supervisor, FTO Supervisor), signing off on reports and other sergeant-related duties. Eastman also helped in the property room many times over his light duty status as needed by CSO Holmquist.
- **John Kiel – 2024:** He was out for approximately three months with shoulder surgery, then light duty for approximately six months. Worked as Assistant Chief, and did not carry a gun or drive a city vehicle until allowed by Chief Winterscheidt in September, 2024.
- **Tim Monte – exact dates unknown:** Monte had hip replacement surgery and returned to light duty on December 16, 2024. Because of the new directive, Monte worked with the Drug Task Force in the Office doing various tasks inside the department. He could carry a gun and drive a city vehicle.
- **Noah Dipuma – exact dates unknown:** Dipuma began light duty on May 3, 2023, following appendix removal. He took “name and number calls”, assisted narcotics in reviewing several weeks’ worth of surveillance footage.
- **Lauren Robinson – 03/26 – Present:** Robinson has worked in an office setting due to significant physical limitations. She has assisted with various tasks including some investigations follow-up and records requests.

In February 2022, Lieutenant Pope assumed responsibility for supervising all officers assigned to light-duty status. The specific assignments given to light-duty officers were not formally documented; however, Officers Seth Noll, Kelsey Davis, Mikayla LeRette, Amanda

Mundell, Zach Pfistner, and Nick Eastman all performed duties in the property room. See also attached documents regarding officers on light-duty, Bates labeled DEF 000721–000747.

Additionally, it was the department’s practice that officers on light-duty were not permitted to carry a firearm, operate a city vehicle, or leave the station. This policy remained in effect until Chief Winterscheidt modified it on September 17, 2024.

INTERROGATORY NO. 4: Describe in detail all policies, practices, and procedures, from January 1, 2020, to present, concerning compliance with the Fair Labor Standards Act and the PUMP for Nursing Mothers Act (including the 2010 Break Time for Nursing Mothers provisions), including:

- (a) provision of reasonable break time to express breast milk;
- (b) provision of a place other than a bathroom that is shielded from view and free from intrusion;
- (c) notice or training to supervisors regarding these obligations; and
- (d) any changes to policy or practice made in response to Plaintiff’s situation or complaints.

RESPONSE No. 4: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. Further object on the grounds that this interrogatory exceeds the permissible scope of discovery in FRCP 26(b) and FRCP 34 because it seeks information that is not arguably relevant to any party’s claims or defenses in this case, and any changes to the policies have no bearing on or causal connection to any claims or defenses. Subject to and without waiving objections, please see attached policies and correspondences Bates labeled DEF000309-000329, 000331-000343, 000922-000969.

INTERROGATORY NO. 5: State all facts supporting the City's contention, if any, that the lactation accommodation provided to Plaintiff (shower stall with chair and curtain, Public Health Nurse office, or any other space) complied with the requirements of 29 U.S.C. § 218d and related regulations, and identify all persons with knowledge of those facts.

RESPONSE No. 5: Objection. Defendants object to this Interrogatory on grounds that it seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stat. § 905.03(2) and pursuant to FRE 501 because it seeks legal conclusions via the identification of facts that defense counsel believes may support their defenses. Defendant further object to this Interrogatory in that it calls for a legal conclusion that that invades the province of the Court and/or jury to which no response is required. Without waiving said objections and, in an effort, to be responsive, see Dkt. 33 at Argument III; Dkt. 34, ¶¶ 100-116; Dkt. 37, ¶¶ 10-29, Dkt. 39, ¶¶ 5-9 and Dkt. 39-1.

INTERROGATORY NO. 6: Identify and describe each complaint, concern, or report, formal or informal, ever made by or on behalf of Plaintiff to any City official or supervisor regarding:

- (a) discrimination based on sex, pregnancy, childbirth, or maternity;
- (b) lack or inadequacy of lactation accommodations;
- (c) harassment or hostile treatment by Lieutenant Pope, Captain Champaigne, Assistant Chief Kiel, Captain Harriman, or any other supervisor; or
- (d) retaliation.

For each, identify the date, the person(s) to whom the complaint was made, what was said, any written documentation, and all actions taken in response.

RESPONSE No. 6: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. Subject to and without waiving objections:

- (a) Plaintiff sent an Internal Investigation Report Rebuttal to Mayor Paine (see document Bates labeled DEF000582-000584; 586-593; 694-717).**
- (b) On or about November 16, 2022, LeRette spoke with Chief Alexander regarding the locker room lactation space (see document Bates labeled DEF000331-332; 585-586).**
- (c) LeRette raised concern with Captain Harriman in 2024, that she did not believe Lieutenant Pope was properly handling her schedule. LeRette was advised to run all scheduling issues through Captain Harriman (see document Bates labeled DEF000586-593; Dkt. 38, ¶¶ 4-7).**
Plaintiff raised two concerns with HR Director Cammi Janigo. First, LeRette believed her email account had been intentionally left deactivated upon her return to work, preventing her from receiving department communications; however, it was later determined to be an oversight. Second, LeRette believed her overtime was being approved later than that of other employees, although it was ultimately approved. The dates on which these concerns were raised are unknown (see document Bates labeled DEF000587-589).
- (d) See document Bates labeled DEF000694-000717 and DEF000559-000612.**

INTERROGATORY NO. 7: Describe in detail the decision-making process that led to Plaintiff's reassignment to the property room following her first maternity leave in November 2022, including:

- (a) all reasons for the reassignment;
- (b) all persons involved in recommending or approving it;
- (c) all alternatives considered; and
- (d) any discussion of Plaintiff's pregnancy, childbirth, maternity status, or lactation needs in connection with that decision.

RESPONSE No 7: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. Subject to and without waiving the objections:

- (a) When Lieutenant Pope became the supervisor for SPD officers assigned to light duty in February of 2022, it was apparent that additional assistance was needed in the property room. As a result of the volume of work in the property room, it was determined that officers assigned to light duty would assist Officer Holmquist in the property room. LeRette was assigned to light duty and her restrictions initially allowed her to assist in the property room which is why she was assigned to the property room for approximately 2 weeks. Additionally, at the time LeRette returned to work, her narcotics partner—Ron Custer remained assigned to patrol and there were no active narcotics investigations for her to return to.**
- (b) Michelle Pope**
- (c) LeRette was moved out of the property room while still on light duty to a desk position within the investigations bureau. LeRette was also allowed to help with other assignments during times she was not needed in the property room.**

- (d) LeRette's medical restrictions which resulted in her light duty status were understood to be related to her childbirth and her restriction preventing her from an assignment in the property room was understood to be related to her lactation.**

INTERROGATORY NO. 8: Describe in detail the decision-making process that led to the imposition upon Plaintiff of restrictions on carrying a firearm, driving a City vehicle, or leaving the station during work hours while on light duty (including September 17, 2024), including identification of:

- (a) all persons involved in recommending or approving such restrictions;
- (b) all reasons for the restrictions; and
- (c) any past practice or comparators relied upon.

RESPONSE No. 8: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. Subject to and without waiving objections:

- (a) It was department practice that officers on light duty did not carry a gun, work outside the building, drive a city car, or work overtime. On September 17, 2024, Chief Winterscheidt published a directive allowing light duty officers to carry a gun, work outside the police department and drive a city vehicle.**
- (b) The restrictions were based on safety concerns and in place to comply with any work restrictions given the possibility of officers getting put in positions where they may reinjure themselves if allowed to carry a gun, work outside the police department or drive a city vehicle.**
- (c) See above.**

INTERROGATORY NO. 9: Describe in detail the conception, authorization, installation, monitoring, and termination of any GPS or other electronic tracking device placed on any vehicle assigned to Plaintiff in 2024, including:

- (a) who proposed using a tracking device, when, and why;
- (b) who authorized its use, and on what basis;
- (c) who physically installed and removed the device, and when;
- (d) what data was collected, how it was accessed, and by whom;
- (e) whether any warrant or legal opinion was sought or obtained; and
- (f) how and when the City determined to stop using such device(s).

RESPONSE No. 9: Defendants object that the Interrogatory is compound, overly broad, unduly burdensome, and calls for information protected by attorney-client privilege and/or work product doctrine. Subject to and without waiving the objections:

- (a) Captain Champaigne, see also Dkt. 36, ¶¶ 36-44.**
- (b) Captain Champaigne see also Dkt. 36, ¶¶ 36-44.**
- (c) Captain Champaigne installed the device in February or early March 2024. It was removed by Captain Harriman in March or April 2024.**
- (d) Location data was collected. Only Captain Champaigne had access to the data.**
- (e) The vehicle was employer-owned and LeRette was explicitly warned that her vehicle was subject to search and monitoring by Superior Police Department Policy 1010.7.**
- (f) Captain Harriman decided that he was not going to continue the investigation upon Captain Champaigne's retirement in March of 2024 because he suspected the issue may resolve upon LeRette's return from maternity leave.**

INTERROGATORY NO. 10: State all facts supporting any contention by the City that the installation and use of the tracking device(s) on Plaintiff's assigned or temporary vehicles was lawful, justified, or reasonable under the Fourth Amendment and/or any City policy. Identify all legal authorities, memorandum, or advice relied upon.

RESPONSE No. 10: Objection. Defendants object to this Interrogatory on grounds that it seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stat. § 905.03(2) and pursuant to FRE 501 because it seeks legal conclusions via the identification of facts that defense counsel believes may support their defenses. Subject to said objections and in an effort to be responsive, see Dkt. 33 at Argument II and Superior Police Department Policy 1010.7 attached and Bates labeled DEF000380-000388.

INTERROGATORY NO. 11: Describe in detail all internal investigations, inquiries, or reviews concerning Plaintiff's work hours, attendance, or use of leave from January 1, 2023, to present, including:

- (a) the origin of any suspicions or allegations;
- (b) the dates the City first learned of any alleged irregularities;
- (c) the scope and method of any investigation;
- (d) each person involved;
- (e) what evidence was collected (including GPS data); and
- (f) all outcomes, recommendations, or discipline considered or imposed.

RESPONSE No. 11: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. Subject to and without waiving

the objections, see Dkt. 35, ¶¶ 4-20, Dkt. 36, ¶¶ 19-32, 36-48, Dkt. 37, ¶¶ 66-81, Dkt. 38 ¶¶ 8-21, 27-51, and documents attached and Bates labeled DEF000614-000693.

INTERROGATORY NO. 12: Identify and describe all internal investigations or disciplinary actions from January 1, 2017, to present against any sworn officer (other than Plaintiff) for alleged timekeeping, attendance, or misuse of leave issues. For each, state:

- (a) nature of the allegation;
- (b) rank and gender of officer;
- (c) whether the officer was placed on leave or had badge/weapon removed;
- (d) whether a contracted external investigator was used; and
- (e) the outcome (including discipline imposed or not imposed).

RESPONSE No. 12: None.

INTERROGATORY NO. 13: Describe in detail the process by which Daniel Hardman was selected, retained, and instructed to conduct an investigation of Plaintiff, including:

- (a) who recommended or approved his retention;
- (b) any prior relationship between Hardman and any member of the City's command staff;
- (c) the scope of work he was asked to perform; and
- (d) any limitations or directions given to him regarding access to records, witnesses, or application of the collective bargaining agreement.

RESPONSE No. 13: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. Further object that Interrogatory is vague as to the term "relationship." Subject to and without waiving objections:

- (a) Hardman was recommended by Chief Alexander and approved to hire by City Attorney Frog Prell, Human Resources Director Cammi Janigo, Captain Champaigne, and Assistant Chief Kiel.**
- (b) Hardman was recommended by Chief Alexander. Assistant Chief Kiel and Lieutenant Pope once met Hardman at a retirement party.**
- (c) Hardman was asked to investigate LeRette's potential abuse of time.**
- (d) The City is not aware of any limitations given to Hardman for conducting his investigation.**

INTERROGATORY NO. 14: State all reasons why Plaintiff was:

- (a) placed on administrative leave on or about September 17, 2024;**
- (b) required to surrender her badge, firearm, keys, and identification;**
- (c) barred from the City of Superior government center; and**
- (d) subjected to different procedures than those contained in Wis. Stat. § 62.13(5), the City's own policies, or the collective bargaining agreement.**

Identify each person who made or contributed to these decisions.

RESPONSE No. 14: Objection. Defendants object to this Interrogatory on grounds that it is compound, overly broad, and unduly burdensome. The Defendants also deny that Plaintiff's allegations are accurate. Subject to and without waiving objections:

- (a) LeRette was the subject of an internal investigation.**
- (b) This is standard procedure when someone is placed on administrative leave.**
- (c) Plaintiff was not banned from the City of Superior Government Center.**
- (d) N/A**

See Dkt. 38, ¶¶ 35-51.

INTERROGATORY NO. 15: Identify every person outside the City of Superior to whom any City official or agent communicated information about the allegations, investigation, or discipline of Plaintiff, including but not limited to:

- (a) any DEA or LSVOTF personnel;
- (b) the Douglas County District Attorney or staff; and
- (c) any neighboring police agencies.

For each such communication, identify: the date, sender, recipient(s), method (email, phone, letter, meeting), a summary of what was communicated, and any documents reflecting the communication.

RESPONSE No. 15: Objection. Defendants object to this Interrogatory on grounds that it is overly broad and unduly burdensome. Subject to and without waiving objections, please see the documents bates labeled DEF000719-000720.

INTERROGATORY NO. 16: Describe in detail all actions taken, if any, by the City in response to concerns that Plaintiff might be, or was being, treated differently because of her pregnancy, childbirth, maternity leave, or nursing status, including any remedial steps, training, or discipline directed toward Lieutenant Pope, Captain Champaigne, Assistant Chief Kiel, Captain Harriman, or any other person.

RESPONSE No. 16: Objection. Defendants object to this Interrogatory on grounds that it assumes the truth of the allegations set forth in the Second Amended Complaint. Defendants deny the accuracy and completeness of the allegations set forth in the Second Amended Complaint. Subject to and without waiving objections, see Dkt. 38, ¶¶ 4-6; document Bates labeled DEF000559-612.

INTERROGATORY NO. 17: State all facts supporting any contention by the City that Plaintiff committed “theft or misuse of public funds,” “insubordination,” or “attendance violations,” as referenced in the Notice of Internal Investigation served on or about September 17, 2024, and identify all documents that support such contentions.

RESPONSE No. 17: Objection. Defendants object to this Interrogatory on grounds that it seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stat. § 905.03(2) and pursuant to FRE 501 because it seeks legal conclusions via the identification of facts that defense counsel believes may support their defenses. Subject to and without waiving objections, see Responses to Interrogatory Nos. 9, 11, and Request for Production No 8.

INTERROGATORY NO. 18: Identify and describe all actual or potential adverse employment actions considered or implemented against Plaintiff from March 2022 to present (including reassignment, denial of training, discipline, negative evaluations, denial of opportunities, referrals to external agencies), the reasons for each, and the identity of the decision-maker(s).

RESPONSE No. 18: Objection. Defendants object to this Interrogatory on grounds that it vague as to “adverse employment actions.” Subject to and without waiving objections, Plaintiff received verbal counsel in September of 2023 for unsatisfactory work product in her role as a narcotics investigator. Plaintiff was also subject to an investigation in 2024 related to abuse of time. See Dkt. 38, ¶¶ 35-51.

INTERROGATORY NO. 19: Identify each position, assignment, training, or promotional opportunity for which Plaintiff was considered, recommended, or rejected (including DEA Task Force Officer or any neighboring agency position) from January 1, 2023, to present, and state all reasons Plaintiff did not receive or retain each such opportunity.

RESPONSE No. 19: Objection. This Interrogatory seeks information that is equally available to Plaintiff from other sources, including documents, records, or third parties accessible to Plaintiff. Defendants further object to the extent the Interrogatory is duplicative of information already produced or otherwise obtainable through reasonable diligence. Subject to and without waiving these objections, none.

INTERROGATORY NO. 20: Identify all documents, data, and ESI that you contend support any affirmative defense asserted in your Answer to the Second Amended Complaint, and identify by name, title, and contact information all witnesses you intend to rely upon to support each such defense.

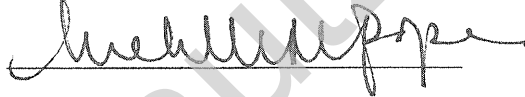
RESPONSE NO. 20: Objection. This Interrogatory constitutes a premature contention interrogatory, as it seeks the factual and legal bases for claims or defenses before the completion of discovery. Defendants further objects to the extent the Interrogatory is overly broad and seeks information protected by the attorney work-product doctrine and/or attorney-client privilege. Subject to and without waiving these objections, Defendants will supplement their response, if necessary, in accordance with the Federal Rules of Civil Procedure at the appropriate time. See also, documents produced in Response to Requests for Production.

VERIFICATION

I hereby verify that I have read the foregoing answers to Interrogatories and know the contents thereof. I am authorized by the City of Superior to sign this pleading. The information set forth in these answers was gathered and compiled by people working on behalf of the City of Superior or from records, files and information kept by the City of Superior. Subject to the above, and pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, upon information and belief, the foregoing answers are true and correct.

Dated this 27th day of April, 2026.

CITY OF SUPERIOR

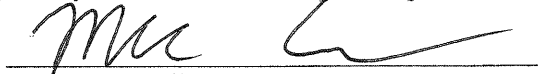


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