

Exhibit 501

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

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
REQUEST FOR PRODUCTION**

City of Superior, by their attorneys, Crivello, Nichols & Hall, S.C., respond to Plaintiff's First Request for Production as follows:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce Plaintiff's complete personnel file, including but not limited to: applications, performance evaluations, commendations, discipline, internal investigations, complaints, transfer/assignment records, supervisory notes, and any documents placed in any "supervisory," "confidential," or "shadow" file.

RESPONSE NO. 1: Objection. This Request is overly broad and 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. Significant amounts of

information contained in these personnel/employee files have no relevance to any fact that is of consequence in this litigation, including documents related to things like employee benefits, insurance, payroll, and the like. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000001-CITY000308.

REQUEST FOR PRODUCTION NO. 2: Produce all policies, SOPs, directives, general or special orders, training materials, memoranda, and labor agreements in effect at any time from January 1, 2020, to present concerning:

- (a) light duty;
- (b) assignment to the property room or evidence/property operations;
- (c) firearms privileges and carrying while on light duty;
- (d) use of City vehicles (including take-home vehicles);
- (e) timekeeping, attendance, and use of paid leave for sworn officers;
- (f) internal investigations and progressive discipline; and
- (g) compliance with FLSA/PUMP Act lactation requirements.

RESPONSE No. 2: Objection. This Request is overly broad and vague as to “concerning.” Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000309-CITY000500.

REQUEST FOR PRODUCTION NO. 3: Produce all documents referring or relating to Plaintiff’s requests for, use of, or complaints about lactation breaks or lactation accommodations, including emails, notes, schedules, memos, and any HR records.

RESPONSE NO. 3: Objection. This Request is overly broad and is impermissibly vague as to “relating to.” Subject to and without waiving these objections, please see the

attached documents Bates labeled CITY000501-CITY000506, CITY000582-CITY000583, CITY000585-CITY000586.

REQUEST FOR PRODUCTION NO. 4: Produce all documents (including emails, text messages, instant messages, and handwritten notes) between or among any of the following—Plaintiff, Pope, Champaigne, Kiel, Harriman, Alexander, Winterscheidt, Janigo, Kalan, Nelson (Holmquist), Mahlen—relating to:

- (a) Plaintiff’s pregnancies, maternity leaves, or parenting;
- (b) Plaintiff’s lactation needs or accommodations;
- (c) Plaintiff’s work assignments, schedule, or timekeeping;
- (d) Plaintiff’s performance as a narcotics investigator or LSVOTF member;
- (e) any complaints, concerns, or investigations involving Plaintiff; and
- (f) any discussion of placing a GPS or tracking device on Plaintiff’s vehicle.

RESPONSE No. 4: Objection. This Request is overly broad and is impermissibly vague as to “related to.” Furthermore, this Request exceeds the permissible scope of discovery as set forth in FRCP 26(b) for the lack of any time limits. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000507-CITY000548.

REQUEST FOR PRODUCTION NO. 5: Produce all documents, including contracts, purchase orders, invoices, emails, and technical documentation, concerning any GPS or other tracking device purchased, maintained, or used by the City or its Police Department from January 1, 2023, to present, including specifically any device used on any vehicle assigned to Plaintiff in early 2024.

RESPONSE NO. 5: Objection. This Request is overly broad and 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. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000549-CITY000552.

REQUEST FOR PRODUCTION NO. 6: Produce all GPS, telematics, AVL, or other location data, logs, maps, reports, screenshots, or exports generated by any tracking device or system concerning any vehicle assigned to Plaintiff from February 1, 2024, through May 31, 2024.

RESPONSE NO. 6: Objection. This Request is overly broad, vague as to "concerning any vehicle" and unduly burdensome. Subject to and without waiving these objections, none.

REQUEST FOR PRODUCTION NO. 7: Produce all documents reflecting consideration of, or legal advice regarding, the installation or use of any tracking device on Plaintiff's vehicle, including any communications with the City Attorney or outside counsel.

RESPONSE NO. 7: Objection. This request seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stats. § 905.03(2) and pursuant to FRE 502 to the extent that it seeks communication between counsel and clients. Subject to and without waiving these objections, none.

REQUEST FOR PRODUCTION NO. 8: Produce all internal investigation files, reports, notes, witness statements, recordings, and exhibits related to any investigation of Plaintiff's work hours, attendance, timekeeping, or alleged "theft or misuse of public funds," including but not limited to the entire file of Daniel Hardman and any internal memoranda or correspondence regarding his work.

RESPONSE No. 8: Objection. This Request is overly broad, vague as to “related to” and “investigation.” Further object that this request seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stats. § 905.03(2) and pursuant to FRE 502 to the extent that it seeks communication between counsel and clients. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000554-CITY000717 and video Bates labeled CITY000553.

REQUEST FOR PRODUCTION NO. 9: Produce all communications (emails, letters, texts, reports, phone logs, memoranda) between any City official and:

- (a) any DEA or LSVOTF official;
- (b) any agent or employee of the United States government;
- (c) the Douglas County District Attorney or staff; or
- (d) any neighboring law enforcement agency,

that refer or relate to Plaintiff, her performance, her honesty, her schedule or timekeeping, her disciplinary status, or the internal investigation(s) described in the Second Amended Complaint.

RESPONSE NO. 9: Objection. This Request is overly broad and unduly burdensome. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000718-CITY000720.

REQUEST FOR PRODUCTION NO. 10: Produce all documents reflecting any complaints, grievances, or concerns raised by officers Mundell, Phillips, or Ashley Johnson about fear of becoming pregnant or starting a family due to Plaintiff’s treatment, or any related command staff discussion of those concerns.

RESPONSE NO. 10: Objection. This Request is overly broad and 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. Any complaints, grievances, or concerns raised by Mundell, Phillips, or Johnson have no relevance to any fact that is of consequence in this litigation. Subject to the objection, none.

REQUEST FOR PRODUCTION NO. 11: Produce all documents showing assignments and restrictions for each sworn officer placed on light duty from January 1, 2017, to present, including duty status forms, internal memos, email communications, and any documents describing limits on firearm carriage, vehicle use, or leaving the station.

RESPONSE NO. 11: Objection. This Interrogatory is overly broad, unduly burdensome, 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. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000721-CITY000747.

REQUEST FOR PRODUCTION NO. 12: Produce all Planit Police (or other scheduling system) records for Plaintiff and for comparators you have identified in Answer to Interrogatory No. 3, including schedules, revisions, audit logs, and any exception reports from January 1, 2022, to September 30, 2024.

RESPONSE No. 12: Objection. This Request is overly broad, vague as to "Planit Police records" and "comparators." Subject to and without waiving these objections, please see the attached documents Bates labeled CITY001098-CITY00001117.

REQUEST FOR PRODUCTION NO. 13: Produce the complete file, including notes, draft and final reports, and all underlying materials, from the DEA or other federal background investigation related to Plaintiff's appointment as a Task Force Officer, to the extent in the City's

possession, custody, or control, including any communications regarding that background investigation.

RESPONSE NO. 13: The Defendants are not in control, custody, or possession of any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 14: Produce all documents reflecting any decision, recommendation, or communication by Mayor Paine, Human Resources, or any other City official regarding the handling of any complaint, charge, or investigation related to Plaintiff, including the January 16, 2025, written warning.

RESPONSE No. 14: Objection. This request is vague as to “reflecting any decision, recommendation, or communication.” Further, this request seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stats. § 905.03(2) and pursuant to FRE 502 to the extent that it seeks communication between counsel and clients. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000613, CITY000748, CITY001118-001122.

REQUEST FOR PRODUCTION NO. 15: Produce any and all audio or video recordings, transcripts, or notes of interviews, meetings, or interrogations of Plaintiff concerning her schedule, attendance, timekeeping, discipline, or internal investigations, including any Hardman interviews.

RESPONSE No. 15: Please see the attached Bates labeled CITY000749-CITY000921 and video Bates labeled CITY000553.

REQUEST FOR PRODUCTION NO. 16: Produce all documents that you contend support any of your defenses to Plaintiff’s FLSA/PUMP Act claim, Fourth Amendment claim, or Equal Protection claim, including but not limited to documents relied upon to assert that the City provided

reasonable lactation accommodations, treated Plaintiff no differently than similarly situated officers, or lawfully installed/used tracking devices.

RESPONSE NO. 16: Objection. This request calls for information protected by attorney-client privilege and/or work product doctrine. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000922-CITY000969, and Defendants' summary judgment filings.

REQUEST FOR PRODUCTION NO. 17: Produce all documents reflecting complaints or allegations, from January 1, 2015, to present, that any City of Superior Police Department supervisor or command staff member engaged in discrimination or retaliation based on sex, pregnancy, childbirth, maternity, or family status, and all documents showing the outcome of such complaints.

RESPONSE No. 17: Objection. This request is vague as to "reflecting." Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000694-000717.

REQUEST FOR PRODUCTION NO. 18: Produce all training materials provided to supervisors or command staff since January 1, 2018, related to discrimination, harassment, retaliation, FLSA compliance, and accommodations for pregnancy and lactation.

RESPONSE No. 18: Objection. This request is impermissibly vague as to "training materials" and "related to" and unduly burdensome. Subject to and without waiving these objections, please see the attached documents Bates labeled CITY000970-CITY001041.

REQUEST FOR PRODUCTION NO. 19: Produce all drafts and final versions of any written or electronic statements, press releases, or public comments regarding Plaintiff, her suspension, internal investigation, or discipline.

RESPONSE No. 19: Objection. This request is impermissibly vague as to “regarding.” Subject to and without waiving these objections, please see the attached video Bates labeled CITY001042.

REQUEST FOR PRODUCTION NO. 20: Produce all documents, including emails and internal memoranda, reflecting any concern that the City might face “liability” or “federal law” issues in connection with Plaintiff’s lactation accommodations or treatment related to pregnancy, childbirth, or maternity, including but not limited to discussions at command staff meetings referenced in the Second Amended Complaint.

RESPONSE NO. 20: Objection. This request is vague as to “issues in connection with.” Further, this request seeks information protected by attorney-client privilege and the attorney work product doctrine as defined in Wis. Stats. § 905.03(2) and pursuant to FRE 502 to the extent that it seeks communication between counsel and clients. Subject to and without waiving these objections, none.

REQUEST FOR PRODUCTION NO. 21: Please provide all documents which you identified, to which you referred, or upon which you relied, in answering Plaintiff’s interrogatories above.

RESPONSE NO. 21: Please see the attached documents Bates labeled CITY000001-CITY001122, and documents referenced in response to each interrogatory.

REQUEST FOR PRODUCTION NO. 22: Please provide all documents identified in the Defendants’ Rule 26(A)(1) Initial Disclosures.


RESPONSE No. 22: Please see the attached documents Bates labeled DEF000001-000181.

REQUEST FOR PRODUCTION NO. 23: Please provide all reports and all investigative materials (such as witness interviews, records of inspections, analyses, etc.) received from the OIR Group relating to Plaintiff LeRette or any Defendant.

RESPONSE No. 23: Please see the attached documents Bates labeled CITY000501-CITY000502, CITY000614-CITY000693, CITY001043-CITY001097.

Dated this 27 day of April, 2026.

CRIVELLO, NICHOLS & HALL. S.C.
Attorneys for Defendants, The City of Superior,
Wisconsin, Thomas Champaigne, John Kiel,
Jeffrey Harriman and Michelle Pope



Samuel C. Hall
Kiley B. Zellner
Maxwell P. Congdon

Post office address:
710 N. Plankinton Ave., Suite 500
Milwaukee, WI 53203
414-271-7722
Email: shall@crivellolaw.com
kzellner@crivellolaw.com

and

7 South Dewey Street Suite 120
Eau Claire, WI 54701
715-598-1730
Email: mcongdon@crivellolaw.com