

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

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WILLIAM WHITFORD, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-0421

GERALD NICHOL, *et al.*,

Defendants.

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**DEFENDANTS' NOTICE AND  
MOTION FOR SUMMARY JUDGMENT**

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TO:

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PLEASE TAKE NOTICE that Defendants Gerald Nichol, et al., by Wisconsin Attorney General Brad D. Schimel and Assistant Attorneys General Brian P. Keenan and Anthony D. Russomanno, hereby move this

Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment on all counts and seeking dismissal of the case in its entirety. The grounds for this motion are, as set forth in the accompanying brief and exhibits, that there is no genuine issue as to any material fact and movants are entitled to a judgment as a matter of law.

Dated this 4th day of January, 2016.

Respectfully submitted,

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s/ Brian P. Keenan

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