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August 10, 2015

Hon. Peter C. Anderson
Dane County Courthouse, Room 6103
215 South Hamilton St.
Madison, WI 53703

Via US Mail and Email: donna.hall@wicourts.gov

Re: Sannes v. Madison Metropolitan School District, et al
Case No. 15-CV-974

Dear Judge Anderson:

This letter will respond to the Defendants' Emergency Notice of Motion and Motion to Stay Proceedings, or in the alternative, Stay Summary Judgment Briefing. The motion asserts that the Plaintiff's summary judgment motion in this case should be stayed because of events that are occurring in the case pending before Judge Niess. Such an argument by the Defendants should be rejected because it was the Defendants that insisted that the two actions go forward independently of each other.

Moreover, the issue that the Defendants assert causes the problem is the alleged lack of service on the Joint Committee on Legislative Organization. The Defendants assert that the failure to serve the Joint Committee causes a jurisdictional concern that they would like to brief. However, the Defendants are simply wrong in their factual assumption. The Joint Committee was served. I have enclosed herewith the Acknowledgments of Service from the Co-Chairs of the Joint Committee.

The Defendants want to drag this case out as long as possible so that the CBAs remain in effect for as long as possible. On behalf of the Plaintiff, we request that the Defendants' Motion for Delay be summarily denied and the Summary Judgment Briefing Schedule remain in effect.

Very truly yours,

A handwritten signature in blue ink, appearing to read "B. McGrath", is written over the typed name.

Brian McGrath
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Encs.

cc via email (with attachments):

Lester A. Pines
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Norman Sannes

Plaintiff,

v.

Case No. 15-CV-974

Madison Metropolitan School District Board of Education,
et al.,


Defendants.

ACKNOWLEDGMENT OF SERVICE

I, Speaker Robin Vos, hereby acknowledge receipt of service on behalf of the Joint
Committee on Legislative Organization, of the following documents:

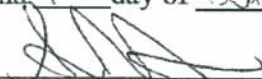
1. One copy of the Summons and Complaint with Exhibits filed in the above
action.





 Speaker Robin Vos

Subscribed and sworn to before me
this 9th day of July, 2015.



 Notary Public, State of Wisconsin
 My Commission is permanent

Norman Sannes

Plaintiff,

v.

Case No. 15-CV-974

Madison Metropolitan School District Board of Education,
et al.,

Defendants.

ACKNOWLEDGMENT OF SERVICE

I, Senator Mary Lazich, hereby acknowledge receipt of service on behalf of the Joint
Committee on Legislative Organization, of the following documents:

1. One copy of the Summons and Complaint with Exhibits filed in the above
action.

Mary Lazich S.W.

 Senator Mary Lazich

Subscribed and sworn to before me
this 9th day of July, 2015.

[Signature]

 Notary Public, State of Wisconsin
 My Commission is permanent