

**IN UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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Susan Doxtator, Arlie Doxtator, and  
Sarah Wunderlich, as Special  
Administrators of the Estate of Jonathon  
C. Tubby,

Case No. 1:19-cv-00137-WCG

Plaintiffs,

**PLAINTIFFS' MOTION FOR LEAVE  
TO FILE A THIRD AMENDED  
COMPLAINT**

vs.

Erik O'Brien, Andrew Smith, Todd J.  
Delain, Heidi Michel, City of Green  
Bay, Brown County, Joseph P. Mleziva,  
Nathan K. Winisterfer, Thomas Zeigle,  
Bradley A. Dernbach, and John Does 1-  
5,

Defendants,

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Pursuant to Rules 15 and 16 of the Federal Rules of Civil Procedure, Plaintiffs Susan Doxtator, Arlie Doxtator, and Sarah Wunderlich (hereinafter "Plaintiffs") respectfully move the Court for an order granting Plaintiffs leave to file a Third Amended Complaint. In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law with exhibits and the Declaration of Forrest Tahdooahnippah with exhibits.

Dated: February 27, 2020.

By /s/ Forrest Tahdooahnippah .  
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Case No. 1:19-cv-00137-WCG

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' MOTION FOR LEAVE  
TO FILE A THIRD AMENDED THE  
COMPLAINT**

This matter is before the Court on Plaintiffs' Motion for Leave to File a Third Amended Complaint. After having considered the motion, the applicable law, and having determined that good cause exists, the Court hereby GRANTS the motion. Plaintiffs may file the Third Amended Complaint attached as Exhibit A to their Memorandum.

IT IS SO ORDERED

Dated: \_\_\_\_\_, 2020

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Honorable William C. Griesbach  
United States District Judge