

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

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,

**MOTION TO COMPEL AND FOR
SANCTIONS**

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,
and John Does 1-5,

Defendants.

Under Rules 30 and 37 of the Federal Rules of Civil Procedure, Plaintiffs Susan Doxtator, Arlie Doxtator, and Sarah Wunderlich (hereinafter, "Plaintiffs") respectfully move the Court for an order compelling Brown County to designate a Rule 30(b)(6) deponent for Topics 1 and 2 in Exhibit A to Plaintiffs' Notice of Rule 30(b)(6) Deposition of Brown County. Plaintiffs additionally move for sanctions for costs and attorneys' fees incurred to prepare this motion. In support of this motion, Plaintiffs submit the accompanying Memorandum of Law in Support of Motion to Compel and For Sanctions and the Declaration of Forrest Tahdooahnippah with exhibits.

Dated: June 17, 2020

By /s/ Forrest Tahdooahnippah
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