

FILED
08-07-2023
CIRCUIT COURT
DANE COUNTY, WI
2022CV001594

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY
BRANCH 3

JOSH KAUL, in his official capacity as Attorney
General, Wisconsin Department of Justice,
WISCONSIN DEPARTMENT OF SAFETY AND
PROFESSIONAL SERVICES, WISCONSIN
MEDICAL EXAMINING BOARD, and SHELDON
A. WASSERMAN, M.D., in his official capacity as
Chairperson of the Wisconsin Medical Examining
Board,

Plaintiffs,

and

CHRISTOPHER J. FORD, KRISTIN LYERLY,
and JENNIFER JURY MCINTOSH,

Intervenors,

v.

Case No. 2022-CV-1594

Declaratory Judgment: 30701

JOEL URMANSKI, in his official capacity as
District Attorney for Sheboygan County, Wisconsin,
ISMAEL R. OZANNE, in his official capacity as
District Attorney for Dane County, Wisconsin, and
JOHN T. CHISHOLM, in his official capacity as
District Attorney for Milwaukee County,
Wisconsin,

Defendants.

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR JUDGMENT ON THE PLEADINGS
ON COUNT I OF PLAINTIFFS' AMENDED COMPLAINT**

Plaintiffs Josh Kaul, Wisconsin Department of Safety and Professional Services, Wisconsin Medical Examining Board, and Sheldon A. Wasserman, pursuant to Wis. Stat. § 802.06(3), hereby move this Court for an order granting them judgment on the pleadings as to Count I of Plaintiffs' Amended Complaint. The grounds for this motion are set forth in the accompanying brief.

Plaintiffs do not request a hearing but rather request that this motion be decided on the papers. If this Court wishes to hear argument, it will be provided at a date and time to be determined by the Court.

Dated this 7th day of August 2023.

Respectfully submitted,

JOSHUA L. KAUL
Attorney General of Wisconsin

Electronically signed by Hannah S. Jurss
HANNAH S. JURSS
Assistant Attorney General
State Bar #1081221

ANTHONY D. RUSSOMANNO
Assistant Attorney General
State Bar #1076050

S. MICHAEL MURPHY
Assistant Attorney General
State Bar #1078149

Attorneys for Plaintiffs

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 266-8101 (HSJ)
(608) 267-2238 (ADR)
(608) 266-5457 (SMM)
(608) 294-2907 (Fax)
jurssh@doj.state.wi.us
russomannoad@doj.state.wi.us
murphysm@doj.state.wi.us