

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

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LISA HUNTER, JACOB ZABEL, JENNIFER OH, JOHN  
PERSA, GERALDINE SCHERTZ, and KATHLEEN  
QUALHEIM,

Plaintiffs,

21-cv-512-jdp-ajs-eec

and

BILLIE JOHNSON, ERIC O'KEEFE, ED PERKINS, and  
RONALD ZAHN,

Intervenor-Plaintiffs,

v.

MARGE BOSTELMANN, JULIE M. GLANCEY, ANN  
S. JACOBS, DEAN KNUDSON, ROBERT F.  
SPINDELL, JR., and MARK L. THOMSEN, in their  
official capacities as members of the Wisconsin Elections  
Commission,

Defendants,

and

WISCONSIN LEGISLATURE,

Intervenor-Defendant,

and

CONGRESSMEN GLENN GROTHMAN, MIKE  
GALLAGHER, BRYAN STEIL, TOM TIFFANY, and  
SCOTT FITZGERALD,

Intervenor-Defendants,

and

GOVERNOR TONY EVERS

Intervenor-Defendant.

BLACK LEADERS ORGANIZING FOR  
COMMUNITIES, VOCES DE LA FRONTERA, the  
LEAGUE OF WOMEN VOTERS OF WISCONSIN,  
CINDY FALLONA, LAUREN STEPHENSON,  
REBECCA ALWIN, HELEN HARRIS, WOODROW  
WILSON CAIN, II, NINA CAIN, TRACIE Y. HORTON,  
PASTOR SEAN TATUM, MELODY MCCURTIS,

21-cv-534-jdp-ajs-eec

BARBARA TOLES, and EDWARD WADE, JR.

Plaintiffs,

v.

ROBERT F. SPINDELL, JR., MARK L. THOMSEN,  
DEAN KNUDSON, ANN S. JACOBS, JULIE M.  
GLANCEY, MARGE BOSTELMANN, in their official  
capacity as members of the Wisconsin Election  
Commission, MEAGAN WOLFE, in her official capacity  
as the Administrator of the Wisconsin Elections  
Commission,

Defendants.

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**DECLARATION OF DOUGLAS M. POLAND IN SUPPORT OF *BLOC*  
PLAINTIFFS' RESPONSE IN OPPOSITION TO MOTION TO STAY  
PROCEEDINGS**

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Douglas M. Poland, being first duly sworn, under oath deposes and declares that:

1. I am one of the attorneys representing the plaintiffs in case number 21-cv-512-jdp-ajs-eec in the consolidated action.
2. I make this Declaration on personal knowledge of the facts and circumstances set forth herein, and in opposition to the pending motion to stay proceedings.
3. I was one of the lead trial counsel for the plaintiffs in *Baldus, et al. v. Members of the Wisconsin Government Accountability Board*, case no. 11-CV-562-JPS (E.D. Wis.).
4. Attached to this Declaration as Exhibit 1 is a true and correct copy of the Scheduling and Discovery Order entered in the *Baldus* case on November 14, 2011, case no. 11-CV-562-JPS (E.D. Wis.), dkt. 35.
5. Attached to this Declaration as Exhibit 2 is a true and correct copy of the Joint Motion of Baldus Plaintiffs and Voces de la Frontera Plaintiffs to Schedule a Half-Day Hearing on Remedies

and to Set a Complementary Briefing Schedule, filed on March 23, 2012, case no. 11-CV-562-JPS (E.D. Wis.), dkt. 212.

6. Attached to this Declaration as Exhibit 3 is a true and correct copy of the Declaration of Douglas M. Poland in Support of Joint Motion of Baldus Plaintiffs and Voces de la Frontera Plaintiffs to Schedule a Half-Day Hearing on Remedies and to Set a Complementary Briefing Schedule, filed on March 23, 2012, case no. 11-CV-562-JPS (E.D. Wis.), dkt. 213 (with exhibits 213-1 through 213-4).

7. Attached to this Declaration as Exhibit 4 is a true and correct copy of an article appearing at <https://www.wispolitics.com/2021/210924report/> (last accessed September 29, 2021).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 1, 2021.

/s/ Douglas M. Poland