

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

CODY FLACK,  
SARA ANN MAKENZIE,  
MARIE KELLY, and  
COURTNEY SHERWIN,  
*individually and on behalf of all others  
similarly situated,*

Plaintiffs,

v.

WISCONSIN DEPARTMENT OF  
HEALTH SERVICES and  
ANDREA PALM, in her official capacity as the  
Acting Secretary of the Wisconsin Department  
of Health Services,

Defendants.

Case No. 3:18-cv-00309-wmc  
Judge William Conley

**PLAINTIFFS' PROPOSED REMEDIAL PLAN**

As directed by the Court in its August 16, 2019 Opinion and Order [ECF No. 217], Plaintiffs respectfully submit their proposed permanent injunctive and equitable relief in the form of the accompanying proposed order. In support their proposed plan, Plaintiffs submit the accompanying brief and the following declarations:

- Fourth Declaration of Orly T. May, Esq.
- Second Supplemental Declaration of Courtney Sherwin
- Second Supplemental Declaration of Emma Grunenwald-Ries
- Declaration of Kristie Meier
- Declaration of Emily Smith, RN, BSN

Dated: September 10, 2019

Respectfully submitted,

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