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LITIGATION ASSISTANT
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October 14, 2021

The Honorable Michael Gableman
Special Counsel
Wisconsin State Assembly Committee on Elections and Campaigns
200 South Executive Drive, Suite 101
Brookfield, WI 53005

Dear Special Counsel Gableman:

This correspondence accompanies records submitted by the City of Madison in response to subpoenas that your office issued to City Clerk Maribeth Witzel-Behl and Mayor Satya Rhodes-Conway. The records are contained on the enclosed flash drive. Consistent with our communications and agreement that the City would initially provide the responsive documents that it could reasonably produce by October 15, 2021, at this time we are providing records which previously have been released in response to public records requests.

It is our understanding that you included the requests that the City Clerk and Mayor appear for an interview solely for the purpose of ensuring delivery of the documents and as a result of this production of documents, neither Clerk Witzel-Behl nor Mayor Rhodes-Conway will appear for an interview on October 15 or October 22, 2021.

City of Madison officials are willing to cooperate if we receive more specific requests from your office, whether or not they are conveyed in a subpoena or a less formal request. To that end, you have requested that the City provide a recommended timeline for producing additional documents related to the November 2020 General Election for your review. Given the vast number of documents involved related to the election and all associated individuals, processes, equipment and supplies, as well as the concerns raised by the Attorney General in the enclosed letter, we are not providing such a timeline at this time. We will certainly respond to more specific requests after you have an opportunity to review the enclosed records and can determine the focus of your inquiry.

You have also issued a subpoena to the City of Madison for a deposition of "the person most knowledgeable in regard to the November 2020 General Election" on October 22,

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2021. Based on our conversations, will wait to hear from your office as to whether you still wish to schedule such a deposition for a future date. We would also need more details about the location and forum of such a deposition, as well as the specific topics you wish to explore before we can confirm attendance by a City official.

Finally, we understand that your office reserves the right to request additional documents and interviews with City staff and officials. The City also reserves the right to object to the issued subpoenas or subsequent requests based on appropriate reasons.

Please contact me if you have any questions regarding this correspondence or the records that are submitted.

Sincerely,

A handwritten signature in cursive script that reads "Michael Haas".

Michael Haas
City Attorney

cc: Mayor Satya Rhodes-Conway
City Clerk Maribeth Witzel-Behl