

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

---

MARK A. CAMPBELL, ALSO KNOWN  
AS NICOLE ROSE CAMPBELL,

Plaintiff,

v.

Case No. 16-CV-261

KEVIN KALLAS, RYAN  
HOLZMACHER, JAMES GREER, GARY  
AKARLO, JEFF ANDERS, MARY  
MUSE, MARK WEISGERBER, ROBERT  
HABLE, CATHY A. JESS, AND CINDY  
O'DONNELL,

Defendants.

---

**DEFENDANTS' NOTICE OF APPEAL**

---

Notice is hereby given that defendants Kevin Kallas, Ryan Holzmacher, James Greer, Gary Akarlo, Jeff Anders, Mary Muse, Mark Weisgerber, Robert Hable, Cathy A. Jess, and Cindy O'Donnell, by their attorneys, Attorney General Brad D. Schimel and Assistant Attorneys General Laure Rakvic-Farr, Timothy Barber, and Ann M. Peacock, hereby appeal to the U.S. Court of Appeals for the Seventh Circuit from the decision and order of U.S. District Court Judge James D. Peterson dated May 4, 2018, which denied Defendants' motion for summary judgment on the basis of qualified immunity and other grounds. The district court's denial of qualified immunity

is an immediately appealable final decision within the meaning of 28 U.S.C.

§ 1291. *Behrens v. Pelletier*, 516 U.S. 306–07 (1996).

Dated: May 11, 2018.

Respectfully submitted,

BRAD D. SCHIMEL  
Attorney General of Wisconsin

s/ Laure Rakvic-Farr  
LAURE RAKVIC-FARR  
Assistant Attorney General  
State Bar #1049540

TIMOTHY BARBER  
Assistant Attorney General  
State Bar # 1036507

ANN M. PEACOCK  
Assistant Attorney General  
State Bar #1046175

Attorneys for the Defendants

Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 266-0323 (Rakvic-Farr)  
(608) 266-9230 (Peacock)  
(608) 266-7234 (Barber)  
(608) 267-8906 (Fax)  
rakvic-farrlc@doj.state.wi.us  
barbertm@doj.state.wi.us  
peacockam@doj.state.wi.us