

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jakob Tiarnan Rumble,

Court File No. _____

Plaintiff,

**COMPLAINT AND
DEMAND FOR JURY TRIAL**

v.

Fairview Health Services, d/b/a Fairview
Southdale Hospital, and Emergency
Physicians, PA,

Defendants.

Plaintiff Jakob Rumble, through his attorneys, Katherine S. Barrett Wiik, of Robins, Kaplan, Miller & Ciresi L.L.P., 800 LaSalle Avenue, Suite 2800, Minneapolis, Minnesota, 55402, and Jill R. Gaulding, of Gender Justice, 550 Rice Street, Suite 105, St. Paul, Minnesota 55103, for his Complaint against the above-named Defendants, states and alleges as follows:

NATURE OF CLAIM

1. This is an action to secure relief for violations of rights guaranteed by the Patient Protection and Affordable Care Act § 1557, 42 U.S.C. § 18116 (2012) (“Section 1557”) and the Minnesota Human Rights Act, Minn. Stat. § 363A.01 et seq. (“MHRA”), specifically, Minn. Stat. § 363A.11, which prohibits discrimination in public accommodations in the State of Minnesota.

2. Both Section § 1557 of the Affordable Care Act and the Minnesota Human Rights Act prohibit discrimination in health care programs on the basis of sex, sex stereotypes, or gender identity. Both prohibit health care programs from providing different – and worse – medical care to transgender individuals.

3. When Plaintiff Jakob Rumble sought medical care from Defendants Fairview Health Services and Emergency Physicians, PA, at the Fairview Southdale Hospital emergency room in June 2013, he received worse care (as described in detail in the enumerated paragraphs below) because of his status as a transgender man. Because of his transgender status, Defendants forced Plaintiff to endure unnecessary pain, trauma, humiliation, and duress. Because of his transgender status, Defendants treated Plaintiff with a lack of care, dignity, and respect. Plaintiff brings this claim under Section 1557 and the MHRA to recover damages for the harms Defendants caused him and for injunctive relief, such as increased training and changes in Defendants' policies and practices, so that in the future Defendants will provide equal, nondiscriminatory care to all of their patients, regardless of gender identity or transgender status.

PARTIES

4. Plaintiff Jakob Rumble ("Plaintiff") is a female-to-male transgender man who resides in Hennepin County, Minnesota.

5. Defendant Fairview Health Services ("Fairview") is a Minnesota corporation with a registered office at 2450 Riverside Avenue, Minneapolis, Minnesota 55454. At all times relevant, Fairview owned and operated Fairview Southdale Hospital, which is located at 6401 France Avenue South, Edina, Minnesota 55435.

6. Defendant Fairview, d/b/a Fairview Southdale Hospital, is a Minnesota-based healthcare organization receiving federal and state financial assistance such as credits, subsidies, or contracts of insurance.

7. At all relevant times, Defendant Fairview employed the services of doctors, nurses, and other professional and non-professional health care providers, including the nurses and other health care providers who cared for Jakob Rumble in June 2013, and held itself out and

warranted itself to the public as competent, careful, and experienced in the care and treatment of patients.

8. Defendant Fairview is vicariously and/or contractually liable for the actions of its principals, agents, employees, shareholders and/or partners.

9. Defendant Emergency Physicians, PA is a Minnesota corporation with a registered office at 5435 Felt Road, Minnetonka, Minnesota 55343. Defendant Emergency Physicians, PA employs the emergency room physicians who staff Fairview Southdale Hospital and several other hospitals in the Twin Cities area.

10. Defendant Emergency Physicians, PA is a Minnesota-based healthcare organization receiving federal and state financial assistance such as credits, subsidies, or contracts of insurance.

11. At all relevant times, Defendant Emergency Physicians, PA employed the services of doctors, and held itself out and warranted itself to the public as competent, careful, and experienced in the care and treatment of patients.

12. At all times relevant, Randall Steinman, M.D. was a principal, agent, employee, shareholder and/or partner of Defendant Emergency Physicians, P.A.

13. Defendant Emergency Physicians, P.A. is vicariously and/or contractually liable for the actions of its principals, agents, employees, shareholders, and/or partners.

JURISDICTION AND VENUE

14. This Court has original jurisdiction over Plaintiff's claims arising under the Patient Protection and Affordable Care Act § 1557, 42 U.S.C. § 18116 (2012) ("Section 1557"). Section 1557 prohibits discrimination on the basis of sex in health programs or activities, "any part of which is receiving Federal financial assistance, including credits, subsidies, or contracts of

insurance, or under any program or activity that is administered by an Executive Agency” or any entity established under Title I of the Affordable Care Act or its amendments.

15. Jurisdiction over these claims is appropriate under 28 U.S.C. § 1331 and §1343(a)(3).

16. Plaintiff’s state law claim under the Minnesota Human Rights Act is so related to those over which this Court has original jurisdiction that they form part of the same case and controversy. Supplemental jurisdiction is therefore appropriate under 28 U.S.C. § 1367.

17. The unlawful acts and practices herein were committed in Hennepin County, Minnesota.

FACTS

18. Transgender people experience high rates of discrimination from health care providers. A 2009 survey conducted by Lambda Legal found that 70 percent of transgender or gender non-conforming respondents reported experiencing discrimination in a health care setting. Lambda Legal, *When Health Care Isn’t Caring*, at 9-10 (2009), http://data.lambdalegal.org/publications/downloads/whcic-report_when-health-care-isnt-caring.pdf. Respondents reported being refused care (nearly 27 percent), being subjected to harsh language (nearly 21 percent), and experiencing physically rough or abusive treatment (nearly 8 percent). *Id.* at 11.

19. The National Transgender Discrimination Survey further documented the extent and severity of discrimination against transgender patients. *See* Jaime M. Grant et al., *Injustice at Every Turn: A Report of the National Transgender Discrimination Survey*, at 72-85 (2011), http://transequality.org/PDFs/NTDS_Report.pdf. High percentages of respondents reported being denied equal treatment in doctor’s offices, hospitals, and emergency rooms. *Id.* at 73. These were often unsafe spaces for transgender patients. Over one-quarter of respondents (28%) reported

verbal harassment and 2% reported being physically attacked. Those who transitioned before age 18 were particularly vulnerable to physical attack. *Id.* at 74.

20. Data from the survey showed that doctors' knowledge of a patient's transgender status significantly increases the likelihood of discrimination and abuse. *Id.* at 75.

21. Medical providers' failure to provide adequate care to transgender patients has resulted in poor health outcomes. *See id.* at 76. Transgender patients often find that medical providers are ignorant about basic aspects of transgender health. *Id.*

22. Many transgender adults postpone or do not seek health treatment when they are injured because of fear of discrimination. "Failing to obtain preventive care is known to lead to poor long-term health outcomes." *Id.*

23. Overall, it is clear that "[m]edical providers and health systems [are] failing daily in [their] obligation to serve transgender and gender non-conforming people, instead subjecting them to mistreatment ranging from commonplace disrespect to outright violence, abuse, and the denial of human dignity." *Id.* at 8.

24. Unfortunately, Jakob Rumble's experience at Fairview Southdale Hospital illustrates these injustices.

25. Jakob Rumble is a 19-year-old transgender man. Jakob identifies as male but was labeled female at birth and given a female birth name.

26. During the week of June 16 to June 22, 2013, Jakob saw his primary care provider with a complaint that his reproductive organs were inflamed and causing him extreme pain. His doctor did some testing but did not identify a diagnosis. The doctor prescribed Jakob a 7-day course of antibiotic treatment.

27. Jakob's pain increased during the week. By Saturday, June 22, 2013, Jakob could hardly walk because of the pain. When he urinated, he had to grab something to brace himself or bite down on a towel to endure the pain. Jakob's mother, Jennifer Rumble, took his temperature. He had a fever of 104° F. Around noon that day, Jennifer, who has professional experience in the medical field, treated Jakob with 800 mg of ibuprofen, which Jennifer knew to be the highest safe dosage for an adult.

28. Jakob and his mother decided to go to the emergency room at Fairview Southdale Hospital. This was the hospital closest to their home. They arrived at the emergency room at approximately 1:00 pm on Saturday, June 23, 2013.

29. Jakob spoke to a person at the Fairview Southdale Hospital front desk who asked some preliminary questions. Jakob gave the front desk clerk his driver's permit. The clerk complained that he could not find Jakob in the computer system. Jakob told the clerk his birth name, and the clerk scrutinized his driver's permit card, which incorrectly identified Jakob as female. (Jakob has since received an updated and accurate driver's permit card, correctly identifying his sex as male.)

30. The Fairview clerk told Jakob, "We have female on file." He gave Jakob a wristband labeled with an "F."

31. The clerk also called over another person. The clerk left the front desk to speak to this person and held a folder in front of his face while whispering to this person. Jakob believed they were discussing his gender.

32. The clerk took Jakob to an intake nurse. They went into an examining room. The nurse took Jakob's vitals. Despite the fact that he had recently taken a relatively high dosage of ibuprofen, Jakob still registered a temperature of 99.7° F.

33. Jakob described the severity of his pain and his recent high temperature.

34. The hospital staff transferred Jakob to an assigned emergency room. Jakob and his mother waited in the room.

35. Jakob waited in the room for hours. When he and his mother tried to call a nurse using the call button in the room, no one responded. Jakob's mother left the room to try to track someone down. Jakob's mother repeated that her son was in severe pain and asked if he could get some pain medication. The emergency room staff said they would need to ask a doctor about that.

36. During the first three or four hours he was in the emergency room, Jakob and his mother asked for pain medication several times. Each time, Jakob's mother had to leave the room and search for emergency room staff to ask because no one ever responded to the call button. After several hours, the staff finally provided some pain medication.

37. Jakob's mother is a medical professional. She and Jakob understood that patients in an emergency room undergo a triage so that the most urgent cases can be treated first. Nevertheless, Jakob and Jennifer believe that people with less urgent medical needs were treated much more quickly than Jakob was treated.

38. At around 5:30 or 6:00 pm, an emergency room doctor named Dr. Randall Steinman came to Jakob's room. He was accompanied by Dr. Karee Lehrman, an obstetrician-gynecologist, and a female nursing assistant/emergency room technician was also present.

39. The doctors asked Jakob, "Is this your mom?" referring to Jennifer Rumble. Jakob indicated that it was. In a hostile and aggressive manner, Dr. Steinman then asked Jakob, "Who are you having sex with?"

40. Jakob asked what he meant by that. Dr. Steinman said, "Men, women, or both?" Dr. Steinman seemed angry, and held his face a few inches from Jakob's face as he asked questions. He asked if Jakob was engaging in penetration and if he'd ever had sex with objects. Dr. Steinman's manner was so hostile that Jakob felt as if the questions were an attempt to embarrass him rather than to diagnose him.

41. Dr. Steinman then examined Jakob. Jakob told Dr. Steinman he was in extreme pain and to please be gentle.

42. Jakob has not had gender confirmation surgery, and has what is often labeled as female genitalia, including a uterus, vagina, cervix and labia. Jakob takes prescription hormone medication.

43. To examine Jakob's genitalia, Dr. Steinman took a strip of gauze and wiped Jakob's labia in a very rough manner. It seemed as if he was pressing down as hard as he could. Jakob felt like he was being stabbed. Then Dr. Steinman repeatedly jabbed at Jakob's genitals with his fingers. Jakob started to cry from the pain.

44. Dr. Steinman asked, "Is this what this normally looks like?" Jakob responded that his labia were swollen to almost three times their normal size. Dr. Steinman apparently disregarded this and said he couldn't tell what was going on because of the male hormones. Dr. Steinman repeated several times that he didn't know what the male hormones Jakob was taking were doing to his body, and that he didn't know how much swelling was due to the hormones.

45. Despite Jakob's crying out and crying from the pain, Dr. Steinman kept jabbing at Jakob's genitals. He seemed to be using as much force as possible. When Jakob could not bear the pain any more, he asked Dr. Steinman to stop. Dr. Steinman ignored him and did not stop,

but continued to forcefully jab at Jakob's genitals, causing Jakob more pain. Jakob continued to cry. He again asked Dr. Steinman to stop and again Dr. Steinman did not stop.

46. Jakob then said, "Mom, can you make him stop?" Jennifer, who was farther from Jakob than Dr. Steinman was, heard him clearly each of these times. She stood up and yelled loudly, "Stop! He said that you needed to stop. Didn't you hear him?" The female nursing assistant/emergency room technician left the room at this time.

47. Dr. Steinman finally stopped jabbing at Jakob's genitals and stared at Jennifer Rumble with an incredulous expression on his face. Jakob asked if Dr. Steinman had determined what was wrong. Dr. Steinman turned to Jakob. He seemed tense and angry. He said, "I can't tell you because your mom made me stop the exam." Then without explaining further he turned and walked out of the room.

48. Dr. Lehrman and the female nursing assistant/emergency room technician were present in the examination room during the time Dr. Steinman repeatedly jabbed at Jakob's genitals over his objections and cries to stop, but they did not intervene to stop Dr. Steinman.

49. After both doctors left, Jakob was left wondering if he was going to receive treatment or not. He sat waiting in the emergency room examination room for two more hours.

50. While they were waiting, Jennifer asked the emergency room staff if Jakob could have something to eat. They said they did not feed people who were in the emergency room. When Jennifer asked if they usually had people waiting in the emergency room for nearly seven hours, they said no. Then they brought Jennifer and Jakob some sandwiches.

51. At around 8:00 pm, Jakob was admitted to the hospital. After Dr. Steinman's treatment, Jakob was very scared. He begged his mother to stay with him.

52. Jennifer felt she could not leave Jakob alone in the hospital. She did not know what might happen if she was not present. She stayed in the hospital with Jakob every day he was there, sleeping on a chair at night.

53. Jakob was initially treated with antibiotics. Over the first few days in the hospital, he did not appear to be getting any better. He continued to experience nearly unbearable pain.

54. Jakob was assigned a private room once admitted to the hospital. In his room, Defendant Fairview's staff used a dry erase board on the wall across from the foot of his bed to track his on-duty nursing staff and current reported pain level. Fairview staff also, however, included on this board the name of treating physicians and their specialties. This included Dr. Lehrman's name with the description "OB/GYN" after her name.

55. Jakob was upset and embarrassed by Defendant Fairview's disclosure on the dry erase board that he was being treated by an "OB/GYN" to non-medical personnel such as dietary and housekeeping/environmental services and any personal guests to his room. There was no need for this information to be visible to everyone; all medical professionals treating Jakob would have had access to the same information on his charts. After a few days, Jennifer erased the "OB/GYN" notation with her finger after observing Jakob's discomfort with that information being visible.

56. Jakob was assigned an infectious disease doctor, Dr. Stephen Obaid. At around 7:00 am on June 24, 2013, Dr. Obaid came to see Jakob. He was wearing gloves and examined Jakob's genital area. He wiped his gloves on the blanket on Jakob's bed. He then examined Jakob's eyes and mouth using the same gloves. Jakob later developed sores on his face in the places that Dr. Obaid had touched.

57. Jakob had the impression that some of the nurses were hostile towards him because they seemed tense and avoided speaking to him when they came into his room. At the beginning of each nurse's shift, they would examine his genitals. He asked one nurse why they did this, and she said it was "completely necessary" but did not explain further.

58. When Jakob asked if she knew what was wrong, this nurse said, "I don't know because I don't have any experience with this sort of thing." She didn't elaborate on what "thing" she meant, but Jakob believed she meant that she had no experience with transgender patients.

59. When a new doctor was substituting for Dr. Lehrman on rounds, Jennifer asked if he had any idea what was wrong. The doctor said, "No, but you know he was very sick. He would have been septic within 12 to 24 hours when you brought him in and he could have died."

60. After Jakob had been in the hospital for three days, Jennifer searched the internet to get information about what might be wrong. She asked one of Jakob's treating doctors, Dr. Obaid, if Jakob might have a sexually-transmitted infection.

61. After she suggested this, Dr. Obaid did a swab of Jakob's genitals for testing. Though he told Jennifer it would be a week before they had the lab results, the hospital began treating Jakob with a different medication and he started improving.

62. Two days after this, Jakob felt physically improved enough that he asked to go home. Jakob believed he may have benefitted from staying longer in the hospital, but he did not feel safe at the hospital and preferred to leave. The hospital released him on Friday, June 28, 2013.

63. A few weeks later, Jakob received a bill from Emergency Physicians, PA, the physician's group that employs Dr. Steinman, regarding his emergency room visit at Fairview Southdale Hospital. The bill indicated no insurance payments were pending and Jakob owed the

full amount. In the billing description for the time he had spent at Fairview Southdale Hospital, it stated, “THE DIAGNOSIS IS INCONSISTENT WITH THE PATIENT’S GENDER.” Jakob’s diagnoses were conditions that can and do affect people of any sex or gender.

64. After this experience, Jakob is afraid of doctors. He refuses to visit a hospital or doctor’s office alone. Jakob was recently ill and Jennifer told him he should see a doctor. Jakob looked terrified.

65. Jakob will not go to Fairview Southdale Hospital again. It is the nearest hospital to his home, but even in an emergency he plans to go somewhere else.

66. Jennifer also feels traumatized by the experience. She was raised to trust doctors and now feels like she allowed them to hurt her son. When Jakob is away from her she worries that he might get injured and be taken to a hospital where he’ll be mistreated.

67. On December 12, 2013, Plaintiff filed a complaint of discrimination with the Office of Civil Rights (“OCR”) against Defendants for violating his rights under the Patient Protection and Affordable Care Act § 1557. The OCR is responsible for ensuring compliance with Section 1557. Region V of OCR is responsible for investigating and remedying violations of Section 1557 that occur in Minnesota, where Fairview Southdale Hospital is located. The OCR’s investigation of this matter is ongoing.

68. This litigation is now filed within the one-year limitations period for claims brought under the Minnesota Human Rights Act, Minn. Stat. § 363A.01 et seq.

COUNT I
SEX DISCRIMINATION
Patient Protection and Affordable Care Act § 1557

69. Plaintiff re-alleges the foregoing paragraphs as though fully set forth herein.

70. Section 1557 of the Patient Protection and Affordable Care Act provides that:

Except as otherwise provided for in this title (or an amendment made by this title), an individual shall not, on the ground prohibited under ... title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.) ... be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any health program or activity, any part of which is receiving Federal financial assistance, including credits, subsidies, or contracts of insurance, or under any program or activity that is administered by an Executive Agency or any entity established under this title (or amendments). The enforcement mechanisms provided for and available under ... title IX ... shall apply for purposes of violations of this subsection.

71. Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.* prohibits sex discrimination in education programs that receive federal financial assistance. Federal courts, including the Supreme Court, have held that Title VII jurisprudence on sex discrimination provides guidance for interpretation of Title IX. See *Franklin v. Gwinnett County Public Schools*, 503 U.S. 60, 75, 117 L. Ed. 2d 208, 112 S. Ct. 1028 (1992); *Oona v. McCaffrey*, 143 F.3d 473, 476 (9th Cir. 1998).

72. For purposes of the definitions set forth in Title IX, therefore, “sex” includes individuals who are perceived as not conforming to gender stereotypes and expectations. See *Kastl v. Maricopa Cnty. Cmty. Coll. Dist.*, CIV.02-1531PHX-SRB, 2004 WL 2008954 (D. Ariz. June 3, 2004) (“It is well settled that Title VII’s prohibition on sex discrimination encompasses discrimination against an individual for failure to conform to sex stereotypes.”); *Miles v. New York University*, 979 F. Supp. 248, 250 n.4 (S.D.N.Y. 1997) (“[T]he Title IX term ‘on the basis of sex’ is interpreted in the same manner as similar language in Title VII.”). Because § 1557 draws its substantive anti-discrimination protections and enforcement mechanisms from Title IX, Title IX’s (and in turn, Title VII’s) definition of sex applies to § 1557’s of the ACA’s prohibition of sex discrimination in healthcare.

73. Moreover, the Office of Civil Rights has explicitly stated that the ACA's Section 1557's prohibition of sex discrimination "extends to claims of discrimination based on gender identity or failure to conform to stereotypical notions of masculinity or femininity." Letter from Leon Rodriguez, Dir. of Office for Civil Rights, Dep't of Health & Human Services, to Maya Rupert, Fed. Pol'y Dir., Nat'l Center for Lesbian Rights (Jul. 12, 2012) (OCR Transaction No. 12-000800).

74. As a transgender person, Jakob Rumble has a right under Section 1557 of the Patient Protection and Affordable Care to receive health care services free from discrimination based upon gender identity or transgender status.

75. The conduct of Defendants described herein constitutes sex discrimination against Plaintiff on the basis of his gender identity and transgender status in violation of Section 1557. Defendants perpetrated this discrimination with malice, deliberate disregard for, or deliberate or reckless indifference to Plaintiff's rights.

76. As a result of these acts of discrimination, Plaintiff has suffered physical pain, embarrassment, humiliation, emotional pain and anguish, violation of his dignity, and loss of enjoyment of life and other compensatory damages. Plaintiff has also incurred and will continue to incur attorneys' fees and costs.

COUNT II
PUBLIC ACCOMODATIONS DISCRIMINATION –
SEXUAL ORIENTATION/GENDER IDENTITY DISCRIMINATION
Minnesota Human Rights Act, Minn. Stat. § 363A.11

77. Plaintiff re-alleges the foregoing paragraphs as though fully set forth herein.

78. The Minnesota Human Rights Act, Minn. Stat. § 363A.11, provides that:

It is an unfair discriminatory practice:

(1) to deny any person the full and equal enjoyment of the . . . services, facilities, privileges, advantages, and accommodations of a place of public accommodation because of . . . sexual orientation, or sex.

79. Plaintiff is a transgender man and for purposes of the definitions set forth in the Minnesota Human Rights Act (“MHRA”), Minn. Stat. §363A.03, subd. 44, he is protected from discrimination based upon his “sexual orientation,” since the statute expressly defines that term to include:

[H]aving or being perceived as having a self-image or identity not traditionally associated with one’s biological maleness or femaleness.

Equivalently, Plaintiff is protected from discrimination on the basis of his gender identity and transgender status, since those are subsumed under the statutory definition of “sexual orientation.”

80. As a transgender person, Plaintiff has a right under the Minnesota Human Rights Act to receive health care services free from discrimination based upon gender identity or his transgender status.

81. The conduct of Defendants described herein constitutes discrimination against Plaintiff on the basis of his gender identity and transgender status in violation of the MHRA. Defendants perpetrated this discrimination with malice, deliberate disregard for, or deliberate or reckless indifference to Plaintiff’s rights.

82. As a result of these acts of discrimination, Plaintiff has suffered physical pain, embarrassment, humiliation, emotional pain and anguish, violation of his dignity, and loss of enjoyment of life and other compensatory damages. Plaintiff has also incurred and will continue to incur attorneys’ fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays:

A. That the practices of Defendants complained of herein be adjudged, decreed and declared to be violative of the rights secured to the Plaintiff by the Patient Protection and Affordable Care Act § 1557 and Minnesota Statute § 363A.01 *et seq.*

B. That a permanent injunction be issued requiring that Defendants adopt practices in conformity with the requirements of the Patient Protection and Affordable Care Act § 1557 and Minnesota Statute § 363A.01 *et seq.*, such as ordering appropriate training on providing care to transgender patients with dignity and respect, and making needed changes in policies and procedures.

C. That a permanent injunction be issued prohibiting Defendants from engaging in the practices complained of herein.

D. That Plaintiff is awarded compensatory damages in an amount in excess of \$75,000 and to be established at trial for his physical pain, embarrassment, humiliation, emotional pain and anguish, violation of his dignity, and loss of enjoyment of life.

E. That the Plaintiff is awarded punitive damages, to the extent allowed by state and federal anti-discrimination law.

F. That the Court retain jurisdiction until such time as the Court is satisfied that the Defendants have remedied the practices complained of herein and is determined to be in full compliance with the law.

G. That the Court order Defendants to pay counsel for Plaintiff their reasonable attorneys' fees and the costs and expenses of this action.

H. That Plaintiff be awarded such other and further legal and equitable relief as may be found appropriate, just, and equitable.

JURY DEMAND

Plaintiff hereby demands a trial by jury of all issues triable of right by a jury.

Dated: June 20, 2014

Respectfully submitted,

GENDER JUSTICE

By: *s/ Jill R. Gaulding*

Jill R. Gaulding (MN No. 388751)
Lisa C. Stratton (MN No. 236858)
Christy L. Hall (MN No. 392627)

550 Rice Street
St. Paul, MN 55103
Phone: 651-789-2090
Fax: 651-789-2093
jill.gaulding@genderjustice.us
lisa.stratton@genderjustice.us
christy.hall@genderjustice.us

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By: *s/ Katherine S. Barrett Wiik*

Katherine S. Barrett Wiik (MN No. 351155)
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402-2015
Phone: 612-349-0809
Fax: 612-339-4181
KBarrettWiik@rkmc.com

ATTORNEYS FOR PLAINTIFF