

STATE OF WISCONSIN

CIRCUIT COURT

BROWN COUNTY

NATHAN D. DELOREY,  
RANDY WERY, PATRICIA SCHICK,  
and DENISE VETTER,

Plaintiffs,

v.

Case No. 22-CV-1322  
Case Codes: 30704, 30701, 30952

CELESTINE JEFFREYS, in her official capacity  
as City Clerk for the City of Green Bay, Wisconsin,

Defendant.

**STIPULATION**

The above-captioned matter having previously come before the Court, the Honorable Marc A. Hammer presiding, which resulted in the Court entering an Order for Temporary Injunction on November 2, 2022 (Doc. No. 19), the parties have agreed to resolve the claims asserted in this action, based on the terms set forth herein, and pursuant to the same,

IT IS HEREBY STIPULATED by the parties, through respective counsel, as follows:

1. In accordance with Wis. Stat. § 7.41, Celestine Jeffreys, in her official capacity as City Clerk for the City of Green Bay (“Clerk Jeffreys”), and her employees, representatives, agents, and designees, shall be permanently enjoined from prohibiting, preventing, or unreasonably restricting members of the public from observing the public aspects of the in-person absentee ballot voting process, in particular, the signing of the certification by the witness to an elector voting an in-person absentee ballot and the elector’s depositing or placement of the

absentee ballot in any ballot collection box, receptacle, or similar return during the in-person absentee voting process.

2. The parties' execution of this Stipulation does not constitute, and shall not be deemed, an admission of liability or wrongdoing by any party hereto, such liability and wrongdoing being by them expressly denied.

3. The parties shall each bear their own attorneys' fees and costs incurred in this matter and with respect to this Stipulation.

4. A final order to this effect may be entered by the Court without further notice to the parties, which shall resolve all claims pending in this case and shall be a final judgment.

Dated at Green Bay, Wisconsin, this 5<sup>th</sup> day of July, 2023.

**THE LAW FIRM OF CONWAY, OLEJNICZAK &  
JERRY, S.C.**

*Counsel for Plaintiffs Nathan Delorey, Randy Wery,  
Patricia Schick, and Denise Vetter*

By: Electronically signed by Kurt A. Goehre

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**CITY OF GREEN BAY**

*Counsel for Defendant Celestine Jeffreys, in her official  
capacity as City Clerk for the City of Green Bay*

By: Electronically signed by Lindsay J. Mather

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