

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

NICOLE K. and ROMAN S., by next friend
Linda R.; ABIGAIL R., LILY R., and
RACHEL H., by next friend Nancy B.; and
ANNA C., BRIAN P., AMELIA P., ALEXA
C., and ZACHARY H., by next friend
Jessie R.; for themselves and those similarly
situated,

Plaintiffs,

v.

TERRY J. STIGDON, Director of the Indiana
Department of Child Services, in her official
capacity, HON. MARILYN A. MOORES,
Marion Superior Court Judge, in her official
capacity, HON. MARK A. JONES, Marion
Superior Court Judge, in his official capacity,
HON. THOMAS P. STEFANIAK, JR., Lake
Superior Court Judge, in his official capacity,
HON. MARSHA OWENS HOWSER, Scott
Superior Court Judge, in her official capacity,
and HON. JASON M. MOUNT, Scott Circuit
Court Judge, in his official capacity,

Defendants.

Case No.: 1:19-cv-01521-JPH-MJD

JURY TRIAL DEMANDED

Honorable James Patrick Hanlon

**PLAINTIFFS' PRELIMINARY
WITNESS LIST**

Plaintiffs NICOLE K. and ROMAN S., by next friend Linda R.; ABIGAIL R., LILY R., and RACHEL H., by next friend Nancy B.; and ANNA C., BRIAN P., AMELIA P., ALEXA C., and ZACHARY H., by next friend Jessie R.; for themselves and those similarly situated (“Plaintiffs”), by and through their counsel and pursuant to the Case Management Plan applicable in this case, hereby submit this Preliminary Witness List identifying witnesses who may be called to give testimony in this matter. This list does not include specific witnesses who may be used for purposes of impeachment or rebuttal. Plaintiffs reserve the right to amend or supplement this list.

1. Linda R. (pseudonym) – next friend of Plaintiffs Nicole K. and Roman S.; facts and circumstances associated with the lives and court proceedings of Plaintiffs Nicole K. and Roman S.;

2. Nancy B. (pseudonym) – next friend of Plaintiffs Abigail R., Lily R., and Rachel H.; facts and circumstances associated with the lives and court proceedings of Plaintiffs Abigail R., Lily R., and Rachel H.;

3. Jessie R. (pseudonym) – next friend of Plaintiffs Anna C., Brian P., Amelia P., Alexa C., and Zachary H.; facts and circumstances associated with the lives and court proceedings of Plaintiffs Anna C., Brian P., Amelia P., Alexa C., and Zachary H.;

4. Terry J. Stigdon – Indiana Department of Child Services Director; CHINS/TPR proceedings, including role of DCS and appointment of counsel;

5. Hon. Marilyn A. Moores – Defendant, Marion Superior Court Judge; CHINS/TPR proceedings, including role of DCS and appointment of counsel;

6. Hon. Mark A. Jones – Defendant, Marion Superior Court Judge; CHINS/TPR proceedings, including role of DCS and appointment of counsel;

7. Hon. Thomas P. Stefaniak, Jr. – Defendant, Lake Superior Court Judge;
CHINS/TPR proceedings, including role of DCS and appointment of counsel;
8. Hon. Marsha Owens Howser – Defendant, Scott Superior Court Judge;
CHINS/TPR proceedings, including role of DCS and appointment of counsel;
9. Hon. Jason M. Mount – Defendant, Scott Circuit Superior Court Judge;
CHINS/TPR proceedings, including role of DCS and appointment of counsel;
10. All past or present agents of Defendants who have knowledge of the facts and
circumstances alleged in the Complaint;
11. Expert Witnesses to be identified in accordance with the Court’s Case
Management order;
12. All witnesses necessary to authenticate exhibits;
13. All individuals, presently unknown, who may be required to testify as rebuttal
witnesses;
14. All individuals, presently unknown, who are identified through discovery; and
15. All witnesses identified by the parties in Preliminary, Final, and Supplemental
Witness lists.

Respectfully submitted,

Dated: May 31, 2019

By: /s/ Kathleen A. DeLaney

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that this PRELIMINARY WITNESS LIST was filed electronically on May 31, 2019, and was simultaneously served on all counsel who have appeared in this matter through the Court's ECF system.

/s/ Kathleen A. DeLaney
Attorney for Plaintiffs