

MADISON TEACHERS INC.,
PEGGY COYNE,
PUBLIC EMPLOYEES LOCAL 61, AFL-CIO,
and JOHN WEIGMAN,

Plaintiffs,

v.

CASE NO.: 2011CV003774

CASE CODE: 30701

SCOTT WALKER,
JAMES R. SCOTT,
JUDITH NEUMANN,
and RODNEY G. PASCH,

Defendants.

**PLAINTIFFS' PETITION FOR SUPPLEMENTAL INJUNCTIVE RELIEF PURSUANT TO
WIS. STAT. § 806.04(8)**

Plaintiffs, Madison Teachers, Inc. and Peggy Coyne, by Cullen Weston Pines & Bach LLP and Public Employees Local 61, AFL-CIO and John Weigman, by Padway & Padway, Ltd., their respective attorneys, hereby petition the Court pursuant to Wis. Stat. § 806.04(8) for supplemental relief in the form of a permanent injunction enjoining and restraining the Defendants from enforcing or implementing those provisions of 2011 Wisconsin Acts 10 and 32 ("Acts 10 & 32") that were declared unconstitutional by the Court in its September 14, 2012 Decision & Order which the Court clarified by a Decision & Order dated October 10, 2012, which are hereafter referred to together as "the Order."

As grounds for this Petition, Plaintiffs respectfully represent that the Defendants, through actions and public statements subsequent to the Order, have asserted that they are

not bound by the Order and have taken steps to enforce provisions in Acts 10 & 32 that were declared in the Order to be unconstitutional.

The grounds for this Petition are more fully set forth in Plaintiffs' Brief in Support of Petition for Supplemental Injunctive Relief Pursuant to Wis. Stat. § 806.04(8) and Affidavit of Counsel, which are filed herewith and incorporated herein by reference.

Dated this 22nd day of April, 2013.

Respectfully submitted,

CULLEN WESTON PINES & BACH LLP



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