

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

STATEMENT OF STIPULATED MATERIAL FACTS

Pursuant to the Court's Procedures to be Followed on Motions for Summary Judgment and Civil L. R. 56(b)(1)(B), the parties to this action have stipulated to the following material facts:

1. *Making a Murderer* ("MaM") premiered on Netflix on December 18, 2015. SAC ¶ 15.
2. Colborn "wrote a statement in September 2003 regarding a telephone call that [he] received in or around 1994 or 1995 while [he] was a corrections officer at the Manitowoc County Jail. That statement was provided to then-Sheriff Kenneth Peterson, who told [Colborn] that he would put the statement in a safe. Shortly thereafter, the statement was turned over to investigators for the State of Wisconsin." Declaration of Andrew Colborn ("Colborn Decl.") ¶ (C)(10).
3. Colborn has not watched MaM in its entirety. *Id.* ¶ (C)(27).

4. Colborn has not watched any portion of MaM Episodes 8, 9 or 10, to the best of his knowledge and recollection. *Id.* ¶¶ (C)(35)–(37).
5. Colborn is voluntarily participating in a documentary tentatively titled *Convicting a Murderer* (“CAM”), which has not yet been released to the public. *Id.* ¶ (C)(38).
6. Colborn voluntarily retired from the Manitowoc County Sheriff’s Department in 2018. *Id.* ¶ (C)(48).
7. Colborn had a retirement party when he retired from the Manitowoc County Sheriff’s Department in 2018. *Id.* ¶ (C)(50).
8. After he retired, Colborn decided to return to the workforce and was able to find new employment. *Id.* ¶ (C)(52).
9. Colborn filed for divorce from his now ex-wife Barb Colborn in March 2021. *Id.* ¶ (C)(54).
10. The divorce was finalized in February 2022. *Id.* ¶ (C)(55).
11. Colborn had a romantic relationship with Jodi Maurer prior to his divorce from Barb Colborn. *Id.* ¶ (C)(57).
12. Colborn’s relationship with Ms. Maurer harmed his relationship with his ex-wife, Barb Colborn, and his adult children. *Id.* ¶¶ (C)(61)–(62).
13. Colborn stipulated that “[f]or purposes of this case, I have agreed not to assert that Making a Murderer caused my divorce.” *Id.* ¶ (C)(56).
14. Colborn believes that Jerome Buting and Dean Strang damaged his reputation in out-of-court statements that they made about Colborn after the release of MaM. *Id.* ¶¶ (C)(17), (19).

15. Colborn at one point had wanted to sue Buting and Strang for defamation. *Id.* ¶¶ (C)(18), (20).

16. Colborn believes that former *Post Crescent* journalist John Ferak damaged his reputation, and at one point wanted to sue Ferak for defamation. *Id.* ¶¶ (C)(21)-(22).

Dated: September 16, 2022

Respectfully submitted,

Signatures on following page

s/ April Rockstead Barker

April Rockstead Barker
ROCKSTEAD LAW, LLC
State Bar No. 1026163
525 N. Lincoln Ave.
Beaver Dam, WI 53916
(920) 887-0387
(262) 666-6483 (facsimile)
aprilrbarker@rocksteadlaw.com

George Burnett (Lead Counsel)
State Bar Number: 1005964
LAW FIRM OF CONWAY, OLEJNICZAK
& JERRY, S.C.
231 S. Adams Street
Green Bay, WI 54301
P.O. Box 23200
Green Bay, WI 54305-3200
Phone: (920) 437-0476
Fax: (920) 437-2868

s/ Leita Walker

Leita Walker
Isabella Salomão Nascimento
Ballard Spahr LLP
2000 IDS Center, 80 South 8th Street
Minneapolis, MN 55402-2119
T: (612) 371-6222
F: (612) 371-3207
walkerl@ballardspahr.com
salamaonascimento@ballardspahr.com

Matthew E. Kelley
Emmy Parsons
Ballard Spahr LLP
1909 K Street, NW, Suite 1200
Washington, D.C. 20006-1157
T: (202) 508-1112
F: (202) 661-2299
kelley@ballardspahr.com
parsonse@ballardspahr.com

Counsel for Netflix, Inc.

s/ Kevin L. Vick

Kevin L. Vick (pro hac vice)
Meghan Fenzel (pro hac vice)
JASSY VICK CAROLAN LLP
355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071
T: (310) 870-7048
F: (310) 870-7010
kvick@jassyvick.com
mfenzel@jassyvick.com

*Counsel for Defendant Laura Ricciardi, Moira
Demos, and Chrome Media, LLC*

s/ James A. Friedman

James A. Friedman, SBN 1020756

GODFREY & KAHN, S.C.

One East Main Street

Suite 500

Madison, WI 53703-3300

T: (608) 284-2617

F: (608) 257-0609

jfriedman@gklaw.com

Counsel for all Defendants