

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 16-cv-1308

FREE THE NIPPLE – FORT COLLINS, an unincorporated association,
BRITTIANY HOAGLAND, and
SAMANTHA SIX,

Plaintiffs,

v.

CITY OF FORT COLLINS, COLORADO,

Defendant.

PLAINTIFFS' WITNESS LIST¹

Witnesses denoted with an asterisk “*” are “will call” witnesses. All other witnesses are “may call.”

1. **Brittiany Hoagland***. Ms. Hoagland will testify regarding her membership in Free the Nipple Fort Collins and the organization’s mission, her experience leading up to, and after, the passage of the modified Section 17-142 in the summer and fall of 2015, the effect of Section 17-142 on her personally, and her desire to stand topless at public places in Fort Collins, Colorado. Estimated time for direct examination: .75 hours.

2. **Samantha Six***. Ms. Six will testify regarding her membership in Free the Nipple Fort Collins, her experience leading up to, and after, the passage of the modified Section 17-142 in the summer and fall of 2015, the effect of Section 17-142 on her personally, and her

¹ Plaintiffs reserve the right to amend this witness list prior to the hearing and trial.

desire to stand topless at public places in Fort Collins, Colorado. Estimated time for direct examination: .75 hours.

3. Ray Martinez. City Councilor Ray Martinez will testify regarding the legislative history of Section 17-142 and the governmental interest served by Section 17-142. Estimated time for direct examination: .75 hours.

4. Tomi-Ann Roberts. Dr. Tomi-Ann Roberts is an expert in psychology and gender studies; she is currently the chair of the department of psychology at Colorado College. She will testify regarding the historical implications of female toplessness, the real vs. perceived differences between the male and female breast, the positive and neutral effects of viewing female toplessness by children, the negative effects of criminalizing female toplessness on women, and objectification theory and its intersection with the criminalization of female toplessness. Estimated time for direct examination: 1 hour.

Dated this 16th day of December, 2016.

KILLMER, LANE & NEWMAN, LLP

s/ Andy McNulty

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