

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

UNITED STATES OF AMERICA
AND THE STATE OF WISCONSIN,
EX REL. DR. TOBY TYLER WATSON,

Relator-Plaintiff,

Case No. 11-CV-236

v.

Honorable J.P. Stadtmueller

JENNIFER KING VASSEL,

Defendant.

**MOTION OF WISCONSIN MEDICAL SOCIETY
FOR LEAVE TO FILE AMICUS MEMORANDUM**

Wisconsin Medical Society respectfully requests leave from this Court to file an amicus memorandum in this action. With this submission, Wisconsin Medical Society seeks to help place the issues in this case in a larger context than that presented by the parties' situation. Wisconsin Medical Society does not intend to submit a separate brief in support of this motion for leave to file its amicus memorandum, but states as grounds for its motion the following:

1. Wisconsin Medical Society is a voluntary individual membership association, organized under the laws of Wisconsin, and established in 1841. Wisconsin

Medical Society is the largest physician advocacy organization in the State representing over 12,500 members.

2. The mission of Wisconsin Medical Society is to improve the health of the people of Wisconsin by supporting and strengthening physicians' abilities to practice high-quality patient care in a changing environment. To that end, Wisconsin Medical Society seeks to educate its members on health care and regulatory developments as well as management and patient care issues resulting in the provision of effective medical services; to serve as an advocate for physicians and patients by promoting high-quality and cost-effective health care; and to provide a forum for debate and discussion of issues affecting patients' medical care.
3. Because of its desire to facilitate physicians' delivery of high-quality medical care in Wisconsin, Wisconsin Medical Society has taken a keen interest in legal actions that give rise to substantial issues affecting the practice of medicine in Wisconsin.
4. The False Claims Act action filed by relator, Dr. Watson, presents such substantial issues because of their potential effects on the patient-physician relationship and the corresponding medical care provided.
5. Wisconsin Medical Society respectfully submits that its views can be of assistance to the Court in this matter. As explained in the accompanying memorandum, Wisconsin Medical Society can provide information concerning the significance of the issues of this case to physicians as a whole and, more

specifically, can provide information as to the consequences of the issues presented by this case on physicians' provision of medical care to their patients.

WHEREFORE, Wisconsin Medical Society respectfully requests that this motion for leave to file an amicus memorandum be granted.

Respectfully submitted,

 s/ Anne Berleman Kearney_____

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