

Exhibit 2

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 CIVIL ACTION NO: 2:13-cv-2176-MHH</p> <p>6 JURY DEMAND</p> <p>7</p> <p>8 ROBIN LITAKER,</p> <p>9 Plaintiff,</p> <p>10 vs.</p> <p>11 HOOVER BOARD OF EDUCATION,</p> <p>12 ANDY CRAIG, in his individual</p> <p>13 and official capacity as</p> <p>14 Superintendent, and CAROL BARBER,</p> <p>15 in her individual and office capacity</p> <p>16 as Assistant Superintendent,</p> <p>17 Defendants.</p> <p>18</p> <p>19 DEPOSITION TESTIMONY OF:</p> <p>20 CAROL BARBER</p> <p>21 JULY 30, 2015</p> <p>22 1:40 P.M.</p> <p>23</p>	<p style="text-align: right;">Page 3</p> <p>1 make objections and assign grounds at the time</p> <p>2 of the trial, or at the time said deposition is</p> <p>3 offered in evidence, or prior thereto.</p> <p>4 IT IS FURTHER STIPULATED AND AGREED</p> <p>5 that notice of filing of the deposition by the</p> <p>6 Commissioner is waived.</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p style="text-align: right;">Page 2</p> <p>1 S T I P U L A T I O N S</p> <p>2 IT IS STIPULATED AND AGREED by and</p> <p>3 between the parties through their respective</p> <p>4 counsel that the deposition of CAROL BARBER may</p> <p>5 be taken before Tanya D. Cornelius, Certified</p> <p>6 Shorthand Reporter and Notary Public, at the law</p> <p>7 offices of Wiggins, Childs, Pantazis, Fisher &</p> <p>8 Goldfarb, LLC, The Kress Building, 301 19th</p> <p>9 Street North, Birmingham, Alabama 35203, on the</p> <p>10 30th day of July, 2015, at approximately 1:40</p> <p>11 p.m.</p> <p>12 IT IS FURTHER STIPULATED AND AGREED</p> <p>13 that the signature to and the reading of the</p> <p>14 deposition by the witness is NOT WAIVED, the</p> <p>15 deposition to have the same force and effect as</p> <p>16 if full compliance had been had with all laws</p> <p>17 and rules of Court relating to the taking of</p> <p>18 depositions.</p> <p>19 IT IS FURTHER STIPULATED AND AGREED</p> <p>20 that it shall not be necessary for any</p> <p>21 objections to be made by counsel to any</p> <p>22 questions, except as to form or leading</p> <p>23 questions, and that counsel for the parties may</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X</p> <p>2</p> <p>3 EXAMINATION BY: PAGE NUMBER:</p> <p>4 Mr. Jent 7</p> <p>5 Ms. Yuengert 183</p> <p>6 Mr. Jent 188</p> <p>7</p> <p>8</p> <p>9 E X H I B I T S</p> <p>10</p> <p>11 PLAINTIFF'S EXHIBIT NO: PAGE NUMBER:</p> <p>12 31 - Calendar 33</p> <p>13 32 - E-Mail 82</p> <p>14 33 - E-Mails 102</p> <p>15 34 - Voice Preview of Voicemail 108</p> <p>16 35 - E-Mail 122</p> <p>17 36 - 2011 Evaluation 175</p> <p>18 37 - 2012 Evaluation 177</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>

<p style="text-align: right;">Page 5</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3</p> <p>4 FOR THE PLAINTIFF:</p> <p>5 WIGGINS, CHILDS, PANTAZIS, FISHER</p> <p>6 & GOLDFARB, LLC</p> <p>7 BY: Kevin W. Jent, Esq.</p> <p>8 The Kress Building</p> <p>9 301 19th Street North</p> <p>10 Birmingham, Alabama 35103</p> <p>11</p> <p>12</p> <p>13 FOR THE DEFENDANTS:</p> <p>14 BRADLEY ARANT BOULT CUMMINGS LLP</p> <p>15 BY: Anne R. Yuengert, Esq.</p> <p>16 One Federal Place</p> <p>17 1819 Fifth Avenue North</p> <p>18 Birmingham, Alabama 35203</p> <p>19</p> <p>20</p> <p>21 ALSO PRESENT: Mary Veal and Robin Litaker</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 7</p> <p>1 E X A M I N A T I O N</p> <p>2 BY MR. JENT:</p> <p>3 Q. Good afternoon, Ms. Barber. Yes,</p> <p>4 that's right.</p> <p>5 A. That's right.</p> <p>6 Q. And is it Dr. Barber or Ms. Barber?</p> <p>7 A. Ms. Barber.</p> <p>8 Q. I had seen some documents. I wanted</p> <p>9 to use the right -- the correct terminology.</p> <p>10 Could you state your name for the record?</p> <p>11 A. Carol Barber.</p> <p>12 Q. And, Ms. Barber, where are you</p> <p>13 currently employed?</p> <p>14 A. Hoover City Schools.</p> <p>15 Q. And I know you've sat here through a</p> <p>16 couple, a day and a half at least of</p> <p>17 depositions. Have you ever given a deposition</p> <p>18 before?</p> <p>19 A. Yes, I have.</p> <p>20 Q. When was that?</p> <p>21 A. With Hoover City Schools and with</p> <p>22 another school district.</p> <p>23 Q. With Hoover, what was that in</p>
<p style="text-align: right;">Page 6</p> <p>1 I, Tanya D. Cornelius, Certified</p> <p>2 Shorthand Reporter and Notary Public, acting as</p> <p>3 Commissioner, certify that on this date, as</p> <p>4 provided by the Federal Rules of Civil</p> <p>5 Procedure, and the foregoing stipulation of</p> <p>6 counsel, there came before me at the law offices</p> <p>7 of Wiggins, Childs, Pantazis, Fisher & Goldfarb,</p> <p>8 LLC, The Kress Building, 301 19th Street North,</p> <p>9 Birmingham, Alabama 35203, beginning at 1:40</p> <p>10 p.m., CAROL BARBER, witness in the above cause,</p> <p>11 for oral examination, whereupon the following</p> <p>12 proceedings were had:</p> <p>13</p> <p>14</p> <p>15 CAROL BARBER</p> <p>16 being first duly sworn, was examined</p> <p>17 and testified as follows:</p> <p>18</p> <p>19</p> <p>20 THE REPORTER: Will this be usual</p> <p>21 stipulations?</p> <p>22 MS. YUENGERT: She's going to read</p> <p>23 and sign.</p>	<p style="text-align: right;">Page 8</p> <p>1 relation to?</p> <p>2 A. It was in relationship to a teacher</p> <p>3 who was -- I can't remember all the details, but</p> <p>4 it was band director when I was principal at</p> <p>5 Simmons Middle School.</p> <p>6 Q. Was that any kind of sex</p> <p>7 discrimination claim?</p> <p>8 A. No. I think it may have had -- a</p> <p>9 component of it may have been age</p> <p>10 discrimination.</p> <p>11 Q. Okay. How long ago was that?</p> <p>12 A. I don't recall.</p> <p>13 Q. This will be similar. You've sat</p> <p>14 through a couple of my depositions, so you know</p> <p>15 the rules, so we don't have to go back through</p> <p>16 all those.</p> <p>17 A. Okay.</p> <p>18 Q. How long have you been with the</p> <p>19 Hoover School System?</p> <p>20 A. Since its beginning. Twenty-eight</p> <p>21 years. I think it's twenty-eight years.</p> <p>22 Whatever it is, the number of years since Hoover</p> <p>23 started.</p>

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1 Q. And you are currently principal at
2 Trace Crossings?
3 A. That's correct.
4 Q. And prior to that, you were assistant
5 superintendent of administration?
6 A. No. I was assistant superintendent.
7 Q. Assistant superintendent. Okay. And
8 how long were you in the position of assistant
9 superintendent?
10 A. Approximately seven years.
11 Q. And then before that, what was your
12 position?
13 A. I was principal at Simmons Middle
14 School.
15 Q. How long were you principal at
16 Simmons?
17 A. Again, approximately seventeen or
18 eighteen years.
19 Q. Okay. And then before that?
20 A. I was director of curriculum
21 instruction for Hoover.
22 Q. Okay. I believe I have your
23 education background from your employment file.

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1 Has there been any -- what is your educational
2 background? What is the highest --
3 A. Master's plus.
4 Q. And do you hold any certifications?
5 A. Yes.
6 Q. What certifications do you hold?
7 A. Early childhood education, elementary
8 education, and principalship.
9 Q. Is that elementary principalship or
10 is that just any --
11 A. K through nine I think it is.
12 Q. Okay.
13 A. It may be K through eight. It's not
14 all the way through twelve. I know it's --
15 Q. Okay. And in your role -- when
16 you're giving me the time you were in the
17 assistant superintendent, does that include part
18 of the time you were at Trace Crossings as the
19 interim principal or are you counting that in
20 that time?
21 A. No.
22 Q. Okay. So you became interim
23 principal at Trace Crossings, I believe, in

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1 November of 2012?
2 A. That's correct.
3 Q. As assistant superintendent, and I
4 really want to focus on the, more or less the
5 time period that Ms. Litaker was at Trace
6 Crossings, okay? What were your job duties
7 during that time period?
8 A. During the time when Ms. Litaker was
9 at Trace Crossings?
10 Q. Trace Crossings, yes, as a principal.
11 A. Okay.
12 Q. Not any time she was there before.
13 A. Okay. During that time period, that
14 would have been approximately two and a half
15 years, my responsibilities as an assistant -- is
16 that what you're asking, my responsibilities as
17 assistant superintendent?
18 Q. Yes.
19 A. I dealt with all appeals whether it
20 be discipline appeal, student appeal, whether it
21 be grievances from teachers. Many complaints
22 would come in directly to me. If it was an
23 appeal, if we were going through the -- I

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1 handled teacher grievances. I worked very
2 closely with Dr. Dodson with curriculum and
3 instruction. I was responsible for working with
4 -- the people that directly I worked with were
5 intervention counselors. I worked directly with
6 nurses. I worked directly with counselors,
7 school counselors. One of my primary
8 responsibilities was to work directly with
9 principals in elementary and middle. The high
10 school principals pretty much went directly with
11 Mr. Craig.
12 Q. Okay.
13 A. I think that -- oh, transportation.
14 I did some things with transportation also.
15 That's an overview. I may not have all of it,
16 but that's kind of an overview.
17 Q. And with your work with elementary
18 and middle school principals, as part of that
19 did you perform evaluations of principals?
20 A. Yes.
21 Q. And did you sort of act as a resource
22 for principals at the central office if they had
23 questions or concerns about anything?

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1 A. Yes.

2 Q. Were you involved in the selection of

3 Ms. Litaker for the principal position at Trace

4 Crossings?

5 A. I sat on the interview committee,

6 yes.

7 Q. And did you know Ms. Litaker prior to

8 that interview?

9 A. I knew her as an assistant principal,

10 and I knew her as a teacher.

11 Q. And then at the time Ms. Litaker took

12 over at Trace Crossings, I believe she took over

13 the principalship from Dot Riley, correct?

14 A. That's correct.

15 Q. And then Debra Smith was the

16 assistant at that time?

17 A. That's correct.

18 Q. And I know it sounds like I'm

19 repeating stuff?

20 A. I understand.

21 Q. But it's a whole new deposition.

22 A. I understand.

23 Q. I want to make the record clear. And

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1 then when Ms. Litaker took over in Trace

2 Crossings, which I believe was in 2010, did you

3 have any conversations with her about any

4 challenges she might face taking over at Trace

5 Crossings?

6 A. I did.

7 Q. And tell me about that.

8 A. The principal who had been there

9 before was a longstanding principal. Again, I

10 think she had been there sixteen, seventeen

11 years. Any time you have a switch from one

12 principal to another principal, there's going to

13 be some turmoil. We talked about that in terms

14 of expectation, because I could share with her

15 some of my experiences when I left a school and

16 another principal came in. So that was close

17 with my mind. And again, she was a longstanding

18 principal, and her practices were pretty

19 ingrained in the school. So we talked a lot

20 about that in terms of that change process, Ms.

21 Litaker coming in as a new principal.

22 I also talked with Ms. Litaker about

23 during the interview process, when Ms. -- Dr.

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1 Riley had retired, I met with teachers and

2 parents about what they wanted in a new

3 principal. And teacher comments, no change.

4 They didn't want any change. They wanted

5 somebody who was coming in and doing the same

6 thing Ms. -- Dr. Riley had put in place.

7 Parents were very adamant. In fact,

8 I had several meetings with parents that they

9 requested -- I called one general meeting to

10 meet with parents, which is kind of typical

11 process that I conducted when I was assistant

12 superintendent. But parents chose to call more

13 meetings because different parents wanted to

14 meet at different times voicing concerns about

15 what they wanted at Trace Crossings, and I did

16 share those conversations that I had with

17 parents and teachers with Ms. Litaker before --

18 or when she became principal.

19 Q. And what did the parents want? What

20 were they looking for?

21 A. A couple of things and I don't recall

22 all of it, but I remember one theme that ran

23 across all parent meetings was visibility and

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1 accessibility. There was a general consensus

2 among parents that Dr. Riley was not visible in

3 the school, and she was not accessible to

4 parents. And that was something that was really

5 important to parents. In terms of being able to

6 have that contact, be able to make that contact

7 in an elementary school, that's very important

8 to parents.

9 Q. As an administrator at the central

10 office, was there any expectations that the

11 school system had that they wanted changes made

12 at the Trace Crossings school by the new

13 administration?

14 A. Any new principal that's assigned in

15 our school system I'm going to talk with them.

16 During that period of time I would have been

17 talking with them about expectations that I had

18 of that principal in terms of expectations for

19 teachers. High expectations for teachers. You

20 want teachers to teach the curriculum. You want

21 teachers to follow the district course of study,

22 I mean, that accountability issue. So, yes,

23 there is always that discussion with principals

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1 about holding teachers accountable and having
2 high expectations for your faculty staff.
3 Q. Was that a problem at Trace Crossings
4 that Dr. Riley had not been holding teachers as
5 accountable as needed to be done?
6 A. There were concerns that had been
7 raised, and mainly this was raised to me through
8 Dr. Camp, about the lack of attention to
9 curriculum consistency across the school in
10 terms of teaching standards, accountability for
11 lesson design, sharing lesson plans, that type
12 of thing.
13 There were concerns that had been
14 raised with me from parents about high
15 expectations for students. Parents felt that
16 perhaps teachers were more concerned about
17 children who were under achievers than they were
18 -- the teachers were concerned more for the
19 under-achieving students than they were for
20 those kids who were at grade level or above
21 grade level, challenging those students. So
22 yes, we had those discussions and we talked
23 about plans, even, for what we could do to begin

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1 that process of change.
2 Q. And just to clarify, you had those
3 discussions with Ms. Litaker?
4 A. Yes, sir.
5 Q. Ms. Litaker was hired, and you've got
6 the exhibits in front of you. I think Exhibit 1
7 is this chart, but we're not going to go into
8 that. Exhibit --
9 A. 2.
10 Q. -- 2 is a letter showing the date
11 that she went into the position. Exhibit 3 is
12 her probationary contract, so -- and we've
13 talked about this already in other depositions,
14 but she was hired as a probationary contract
15 principal, correct?
16 A. That's correct.
17 Q. And then at the end of 2012, a
18 determination had to be made whether or not to
19 renew her contract --
20 A. That's correct.
21 Q. -- at the end of June 2012? And the
22 contract was renewed for a three-year period,
23 correct?

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1 A. That's correct.
2 Q. And Exhibit 4 is that contract. Were
3 you involved in any discussions with Mr. Craig
4 about the renewal of Ms. Litaker's contract?
5 A. Yes.
6 Q. Okay. Tell me what you recall about
7 those.
8 A. Well, and I say yes. Any time a
9 contract principal was coming up for renewal
10 because I was the one who was doing the
11 day-to-day work with principals, Mr. Craig and I
12 would have a conversation. We had more in-depth
13 conversations about principals that we had
14 concerns about than we did with the principals
15 that were on a good to go kind of basis.
16 So yes, from the standpoint we had
17 discussions, I felt comfortable with Ms.
18 Litaker. I felt she was -- as a probationary
19 principal, I felt she was doing what we expected
20 of her and that there was cause to give her that
21 next contract.
22 Q. Okay. So she would have been in the
23 group maybe that you didn't have to have the

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1 in-depth conversations about?
2 A. At that time, yes, sir.
3 Q. At that time?
4 A. Uh-huh (positive response).
5 Q. And then at -- had you had any
6 complaints from teachers or staff made to you
7 about Ms. Litaker at the time of her contract
8 renewal?
9 A. No.
10 Q. Were you aware of any complaints that
11 had been made to Ms. Veal?
12 A. Yes. Can I go back?
13 Q. Yes.
14 A. I just thought. I had a complaint
15 from another administrator in our district about
16 some procedural -- following procedural things
17 at the school. And this was prior to us
18 renewing Ms. Litaker's contract.
19 Q. Who was that person that made that
20 complaint?
21 A. Wayne Smith.
22 Q. He's the truant --
23 A. He's our coordinator for student

<p style="text-align: right;">Page 21</p> <p>1 services.</p> <p>2 Q. He's the one that Bob Lawry works for</p> <p>3 now?</p> <p>4 A. With.</p> <p>5 Q. With. Okay. And what was that</p> <p>6 complaint from Mr. Smith?</p> <p>7 A. I don't recall -- that's why it</p> <p>8 wasn't at the top of my mind. I don't recall</p> <p>9 all the specifics, but Mr. Smith came to me. It</p> <p>10 was a situation dealing with either a homeless</p> <p>11 child or a child -- it was -- or maybe it had</p> <p>12 been second party residence. I cannot remember</p> <p>13 exactly what it was, but Mr. Smith had worked</p> <p>14 out the agreement, and Ms. Litaker did not</p> <p>15 follow through on the agreement in the school.</p> <p>16 And, in fact, made it much for more difficult</p> <p>17 for him and he was very concerned because there</p> <p>18 were some legal ramifications of that. He</p> <p>19 brought that to my attention.</p> <p>20 Q. Did you raise that with Ms. Litaker?</p> <p>21 A. No, sir, I didn't. I take that back.</p> <p>22 Yes, I did. We talked about it, because I</p> <p>23 remember Ms. Litaker giving me her reasons for</p>	<p style="text-align: right;">Page 23</p> <p>1 confidential meeting that Ms. Veal had, Ms. Veal</p> <p>2 was -- I knew we worked very closely together.</p> <p>3 She would not share that name, and typically, I</p> <p>4 had learned not to ask the name, because I</p> <p>5 didn't want to jeopardize her role in HR as</p> <p>6 people being able to feel they could go to her</p> <p>7 and share information. So I'm not sure at the</p> <p>8 beginning that she shared any concerns in terms</p> <p>9 of names of people.</p> <p>10 The concerns that were coming in that</p> <p>11 I recall were general unrest kinds of concerns</p> <p>12 from Trace Crossings, people feeling teachers</p> <p>13 being pitted one against another, a general</p> <p>14 concern of teachers not knowing what was</p> <p>15 expected of them, mixed messages. Teachers were</p> <p>16 getting mixed information from Ms. Litaker in</p> <p>17 terms of what they were supposed to do. One day</p> <p>18 they were supposed to do a lesson plan this way,</p> <p>19 the next day they were supposed to-- or the next</p> <p>20 week, they were supposed to do a lesson plan</p> <p>21 another way. So it was just general unrest at</p> <p>22 the beginning.</p> <p>23 Q. And did you do anything to address</p>
<p style="text-align: right;">Page 22</p> <p>1 doing what she had done. Yes, we did.</p> <p>2 Q. Did you feel that situation was</p> <p>3 resolved?</p> <p>4 A. Yes, I did.</p> <p>5 Q. And Ms. Litaker didn't receive any</p> <p>6 kind of discipline as a result of that?</p> <p>7 A. No, sir.</p> <p>8 Q. Now, as far as the complaints that</p> <p>9 Ms. Veal told you about, which ones do you</p> <p>10 remember receiving or hearing about from Ms.</p> <p>11 Veal?</p> <p>12 A. Restate your question.</p> <p>13 Q. Yeah. Before we got into the</p> <p>14 complaint you received or whatever the issue was</p> <p>15 with Mr. Smith, I asked you if Ms. Veal had told</p> <p>16 you about any complaints from faculty or staff,</p> <p>17 and you said yes, and I just wondered if you</p> <p>18 recalled what those situations were?</p> <p>19 A. I can remember Ms. Veal sharing with</p> <p>20 me a general concern when calls started coming</p> <p>21 to her or requests for conferences. I don't</p> <p>22 remember at the beginning if Ms. Veal even</p> <p>23 shared names because many times if it was a</p>	<p style="text-align: right;">Page 24</p> <p>1 those concerns at the beginning?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And what did you do to address those</p> <p>4 concerns?</p> <p>5 A. I met regularly with Ms. Litaker. I</p> <p>6 was in the building quite frequently, and we</p> <p>7 would talk about how are things going. That was</p> <p>8 part of my role. I didn't do that just with Ms.</p> <p>9 Litaker. I did that with any principal that I</p> <p>10 was working with. How are things going? And in</p> <p>11 those courses of conversations, if there were</p> <p>12 things that had been brought to my attention,</p> <p>13 I'm going to ask that question. Tell me about</p> <p>14 this or tell me about that. And we did have</p> <p>15 those. Ms. Litaker and I had had those kinds of</p> <p>16 conversations in terms of curriculum planning,</p> <p>17 instructional supervision, discipline within the</p> <p>18 school. Those were part of our general normal</p> <p>19 conversations.</p> <p>20 Q. Did you talk to her about teachers</p> <p>21 feeling like they were pitted against each</p> <p>22 other?</p> <p>23 A. At that time -- before her contract</p>

<p style="text-align: right;">Page 25</p> <p>1 being signed?</p> <p>2 Q. Yes.</p> <p>3 A. No. I didn't have that kind of</p> <p>4 complaint.</p> <p>5 Q. That came after?</p> <p>6 A. That came after.</p> <p>7 Q. What about the teachers not knowing</p> <p>8 what was expected of them?</p> <p>9 A. Again, timeline here, to me, is very</p> <p>10 significant, because by the end of 2012 when we</p> <p>11 were looking at moving to a new contract, I knew</p> <p>12 there was some general unrest, but it wasn't</p> <p>13 anything that I didn't expect. In fact, I can</p> <p>14 remember Ms. Litaker and I talking about some of</p> <p>15 that unrest, and talking about, because she was</p> <p>16 trying to implement some changed practices in</p> <p>17 the school, and that's normal. People don't</p> <p>18 like change, particularly teachers perhaps don't</p> <p>19 like change sometimes. So the kinds of concerns</p> <p>20 I heard were not unexpected concerns in that</p> <p>21 summer of 2012.</p> <p>22 Q. Okay.</p> <p>23 A. It highly escalated, it escalated</p>	<p style="text-align: right;">Page 27</p> <p>1 one time talking to Ms. Litaker about a teacher</p> <p>2 who was just shaking when a couple of us walked</p> <p>3 into a classroom. It was a very sterile, cold</p> <p>4 -- you would walk into a team meeting, there was</p> <p>5 not collaboration. There was not dialogue and</p> <p>6 discussion. Teachers weren't working together</p> <p>7 as you would expect in an elementary school.</p> <p>8 Q. And you had not noticed that in the</p> <p>9 year before?</p> <p>10 A. I had noticed perhaps some of it. It</p> <p>11 wasn't as red flagged as it was in that fall of</p> <p>12 2012.</p> <p>13 Q. Okay. You said a teacher was shaking</p> <p>14 when a couple of you walked in. Who walked in?</p> <p>15 A. We had -- you've heard about this</p> <p>16 team that we developed as a result of Dr. Camp</p> <p>17 and Ms. Litaker meeting with us at central</p> <p>18 office, and I can remember the team -- how the</p> <p>19 team was put together, we always decided to have</p> <p>20 two people go into classrooms to observe. And</p> <p>21 the person -- we were going to switch up those</p> <p>22 teams as we went through. We were not only</p> <p>23 going to not only switch up the grade levels</p>
<p style="text-align: right;">Page 26</p> <p>1 terrifically in the fall of 2012.</p> <p>2 Q. And in you being someone who was in</p> <p>3 the school a lot and in the school after, was</p> <p>4 there a reason you found that those concerns</p> <p>5 escalated so much in the fall of 2012?</p> <p>6 A. Ask me that question again.</p> <p>7 Q. Yeah. That was probably a bad</p> <p>8 question. Did you ever find out if there was a</p> <p>9 -- what was the reason those concerns about Ms.</p> <p>10 Litaker escalated so much in the fall of 2012?</p> <p>11 A. Do I -- I'm asking you a question.</p> <p>12 Do I answer that based on what I knew in the</p> <p>13 fall of 2012 or do I answer that based on after</p> <p>14 I became a principal at Trace Crossings?</p> <p>15 Q. What did you learn in the fall of</p> <p>16 2012 at that time?</p> <p>17 A. When I was in the -- visiting in the</p> <p>18 fall of 2012, there was a distinct coldness to</p> <p>19 the building. And by cold, I mean teachers</p> <p>20 weren't talking to one another. You walked</p> <p>21 through the hallways, you didn't hear greetings</p> <p>22 from teachers. You walked in the classrooms,</p> <p>23 and there was almost a fear factor. I remember</p>	<p style="text-align: right;">Page 28</p> <p>1 that we observed, but we were going to switch up</p> <p>2 the team who served on the teams together.</p> <p>3 If my memory serves me correctly, Ms.</p> <p>4 Litaker and Dr. Dodson were teamed up. Dr. Camp</p> <p>5 and Ms. Gurosky were teamed up, and I was teamed</p> <p>6 with Ms. Stone, the assistant principal. So any</p> <p>7 time I did an observation in the school, Ms.</p> <p>8 Stone accompanied me. I think there was only</p> <p>9 one time that I visited the school that I went</p> <p>10 by myself. Ms. Stone was not available. And we</p> <p>11 arranged those ahead of time, so I knew her</p> <p>12 calendar would be clear.</p> <p>13 But one time when we did go into a</p> <p>14 classroom to observe, a teacher, when she was</p> <p>15 writing on the board, her hand was actually</p> <p>16 shaking she was that fearful, which I didn't</p> <p>17 perceive as a healthy situation.</p> <p>18 Q. Was she fearful, did you perceive,</p> <p>19 because you and Ms. Stone had walked in or was</p> <p>20 she just -- I mean, what was your perception of</p> <p>21 that?</p> <p>22 A. My perception was she was very</p> <p>23 fearful. I mean, I talked with Ms. Litaker</p>

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1 about it.

2 Q. Who was that teacher?

3 A. Ms. Sessamen. You know, it was not

4 usual for me to walk into a teacher's classroom

5 and see somebody shaking. That was a very

6 unusual practice during those observations, and

7 I was concerned about it.

8 Q. Did you talk to Ms. Sessamen about

9 that?

10 A. No, I expected Ms. Litaker and, in

11 fact, Ms. Litaker did share with me that she

12 would follow up. Ms. Litaker explained to me

13 that Ms. Sessamen -- at the time when we

14 discussed it, Ms. Litaker explained that Ms.

15 Sessamen was a very nervous person. She wasn't

16 concerned about it because she felt that that's

17 very typical of Ms. Sessamen. She gets very

18 nervous and that she was not as concerned about

19 that behavior as I was.

20 Q. And then my understanding is after

21 you -- well, let me ask this question: Prior to

22 the signing of the contract in June of 2012,

23 were you aware of any -- I guess what -- is what

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1 you're telling me you're not aware of any

2 specific people that complained about Ms.

3 Litaker or are you aware of any specific people?

4 A. I am.

5 Q. Who?

6 A. Wayne Smith.

7 Q. Other than Wayne Smith?

8 A. No, I'm not aware of any specific

9 teachers prior to that that I can recall right

10 now.

11 Q. Or staff person?

12 A. Not that I can recall right now.

13 Q. What did you learn after you became

14 principal was the cause of many of those

15 complaints and did you learn it -- I guess,

16 first, what did you learn and, second, when did

17 you learn it, but I'll follow up with that after

18 you tell me.

19 A. Cause of what?

20 Q. The escalating concerns in the fall

21 of 2012. You just told me what you observed

22 during that time period. What did you find out

23 later after you were principal?

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1 A. Lack of trust, serious lack of trust

2 of their principal, teachers -- lack of trust

3 from teachers to the principal. Fear behaviors

4 on the part of teachers toward the principal,

5 teachers feeling bullied, teachers feeling they

6 could not approach their principal with a

7 question or they could not approach their

8 principal with -- engage in serious dialogue,

9 particularly if they had a different opinion.

10 They felt they were being told what to do, and

11 if they had any question about what they were

12 going to do, that there was a -- they felt a

13 possibility of retaliation.

14 There was a lack of team, that

15 camaraderie, the collaboration across teams. It

16 was in my -- and this is my perception, based on

17 when I became a principal at Trace Crossings,

18 lack of collaboration, lack of trust, lack of

19 respect. Teacher felt they had been -- and

20 these are my words. The teachers felt they were

21 stripped of their professionalism, and then that

22 lack of embracing a common vision, embracing a

23 common mission of where are we going and what

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1 are we doing, and how can we achieve it.

2 Q. When did you come to that conclusion?

3 A. I can't remember or recall a specific

4 timeline. I know that the longer -- when I went

5 to Trace Crossings, it was on an interim basis

6 to really kind of get an assessment of the

7 situation. The longer I was there, the more

8 people trusted me to share information with me

9 because, again, I'm not -- I mean, I'm an

10 outsider coming in right now, although they know

11 who I am. But they were not -- at the very

12 beginning, they were not comfortable coming in

13 and sharing information.

14 That took a while for me to establish

15 rapport and respect with them. I'm going to say

16 over a timeline of about anywhere from six

17 months to a year that I came to that conclusion

18 of what really -- what's the guts of what was

19 going on in terms of some problems at Trace

20 Crossings.

21 Q. Okay. I'm going to show you what's

22 been introduced and I'm going to mark as Exhibit

23 31. This will be helpful somewhat.

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1 (Plaintiff's Exhibit No. 31 was
2 marked for identification.)
3 Q. Exhibit 31 is a copy of your calendar
4 or portions of your calendar. First off, do you
5 recognize this as portions of your calendar that
6 was produced?
7 A. I do.
8 Q. And my understanding of what -- this
9 is portions that -- weeks that reflect meetings
10 that you had that involved Trace Crossings?
11 A. I'm sure that's what was pulled from
12 my calendar, yes.
13 Q. Okay.
14 A. I do need to also share with you a
15 disclaimer. This is my calendar. I'm pretty
16 detail oriented. Not every single thing is on
17 my calendar, and sometimes there would be things
18 that would be on my calendar that maybe there
19 was a meeting that didn't occur that I didn't
20 take off. This is a general outline. And,
21 again, this goes back to 2012. So I can't tell
22 you exactly every single thing on here is
23 exactly accurate. My calendar today reflects

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1 something other than perhaps -- or my calendar
2 on Monday reflects something perhaps different
3 than what I did that day.
4 Q. Okay. The first entry is TC
5 staffing. That's on April 13th, Friday the
6 13th. That's the first entry I found. I'll
7 represent that to you.
8 A. Okay.
9 Q. And we've talked a little bit about
10 that staffing meeting. Is that the staffing
11 meeting where different things were discussed
12 but no terminations were recommended? Do you
13 recall that?
14 A. Well, it's a staffing meeting we
15 hold, and you can see that day was full of
16 elementary staff. I mean, you wouldn't know
17 that those are elementary schools, but that's
18 elementary staffing day. And I'm not going to
19 say that there weren't any decisions made,
20 because we could make a decision in staffing
21 meeting. I mean, there's times that very
22 definitely we made decisions. So yes, it was a
23 staffing meeting, but no to the idea that there

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1 -- there may have been decisions made during
2 that time.
3 Q. The next thing I have, the next page
4 is the week of July 9th to July 15th. And it's
5 on July 11th I have a 10:00 a.m. meeting with
6 Dr. Camp and Ms. Litaker, correct?
7 A. That's correct.
8 Q. And also you attended the meeting
9 then with them, correct?
10 A. That would be what's on this
11 calendar, yes.
12 Q. And Mr. Craig was at the meeting?
13 A. I don't know which meeting that is,
14 because it doesn't say Craig was on there.
15 Q. Okay.
16 A. Now, if this was the meeting, and I'm
17 trying to look at the next week, because I can't
18 remember which day that was when we met with Mr.
19 Craig and Dr. Litaker -- I mean, Ms. Litaker and
20 Dr. Camp and Dr. Dodson. I'm assuming that is
21 that meeting on the 11th.
22 Q. Okay. I think I have an e-mail
23 somewhere that verifies that, but I will find

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1 it.
2 A. I assume that's the meeting.
3 Q. But we'll move on. You recall
4 attending a meeting with Dr. Camp, Ms. Litaker,
5 Mr. Craig and Dr. Dodson?
6 A. Yes.
7 Q. And who called that meeting; do you
8 recall?
9 A. I was told Dr. Camp called the
10 meeting.
11 Q. And Dr. Camp was the director of
12 elementary curriculum?
13 A. She was -- at that time she was
14 either director of elementary curriculum or
15 director of curriculum and instruction. One of
16 those two. I'm not sure. Her title changed
17 somewhere in there.
18 Q. And were you told what the purpose of
19 the meeting was before the meeting?
20 A. The meeting had been called by Dr.
21 Camp with Mr. Craig. Mr. Craig decided to bring
22 Dr. Dodson and I along in on the meeting. He
23 was a little concerned and he didn't really know

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1 what the purpose of the meeting was, but he was
2 concerned that Dr. Kent may come in asking for
3 some resources for Trace Crossings. And we had
4 kind of talked about some possible alternatives
5 if indeed there was a request for some
6 additional money for Trace Crossings.
7 Q. And why did you have a -- why was
8 there --
9 A. I'm not sure if it was money or just
10 resources.
11 Q. Why was there a concern that Dr. Camp
12 might ask for additional resources for Trace
13 Crossings?
14 A. I can't answer that. It may have
15 been something Dr. Camp said to Mr. Craig when
16 she set the meeting up. I'm not sure.
17 Q. Were you aware of any AYP results
18 that had come in around the first of July?
19 A. To the best of my recollection, we
20 didn't have AYP results yet. What I remember is
21 that we had gotten individual student test
22 scores, but I don't think we had AYP results
23 yet, but principals had received individual

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1 student test scores. They had those in their
2 possession, and we had them in the possession at
3 the district level.
4 Q. Okay. And then what happened --
5 well, as a result of those individual test
6 scores, was there a concern that Trace Crossings
7 may have not -- may have failed part of the AYP
8 for the testing year, for that time period that
9 the results were received?
10 MS. YUENGERT: Object to the form.
11 You can answer.
12 A. At that time before the meeting?
13 Q. Yes.
14 A. No.
15 Q. During the meeting, was that issue
16 raised?
17 A. Yes.
18 Q. Who raised that?
19 A. Deborah Camp.
20 Q. And why did Ms. Camp raise or Dr.
21 Camp raise about that?
22 A. Dr. Camp raised the question about
23 they were concerned, they being she and Ms.

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1 Litaker were concerned about the preliminary
2 analysis they had done on their test scores.
3 Q. Okay. And had you done any kind of
4 analysis on the test scores at that point?
5 A. Not to my -- did I personally?
6 Q. Yes, Trace Crossings?
7 A. No, sir.
8 Q. And what was their -- was their
9 concern that some portion had failed the test
10 scores?
11 A. No, not that I remember.
12 Q. Okay.
13 A. No, not that I remember.
14 Q. Okay. Did they articulate a specific
15 concern about the test scores?
16 A. Yes.
17 Q. And what was that?
18 A. Ms. Litaker shared that she was
19 concerned that -- we gave a test called SMI in
20 the district, and it was supposed to be a
21 predictor for how children would perform on the
22 state test. And Ms. Litaker and Ms. Camp shared
23 the concern that some of the scores that they

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1 had from the predictor test, the SMI assessment,
2 were significantly different than the ARMT
3 scores and that caused -- they did raise that as
4 a concern during that meeting that I remember.
5 Q. And during the meeting, did Dr. Camp
6 or Ms. Litaker ask for additional resources for
7 Trace Crossings?
8 A. Yes.
9 Q. And what did they ask for?
10 A. Dr. Camp asked for a consultant. I
11 don't recall the name of the consultant, but she
12 did ask for a consultant. There was also, and I
13 can't remember if it came from Dr. Camp or Ms.
14 Litaker, for some additional teacher unit
15 resources, and I was trying to think. I thought
16 there was -- but I can't remember. I thought
17 there was a third issue that they asked for, but
18 right off the top of -- oh, there was. There
19 was a request by Dr. Camp and Ms. Litaker to
20 transfer some teachers out of Trace Crossings.
21 Q. Okay. Had Dr. Camp been with the
22 system what you would consider a good number of
23 years at this point of that meeting? I mean,

<p style="text-align: right;">Page 41</p> <p>1 was she new to the job or had she been in her 2 position for a while? 3 A. She had been -- by a while, if you 4 mean five plus years. 5 Q. Yes. 6 A. Yes, she had been in that position. 7 Q. Not since the beginning of -- not 8 quite as long as you, but she was not new to her 9 job? 10 A. That's correct. 11 Q. Okay. Had a consultant been at Trace 12 Crossings in the two or three years prior to 13 this request being made, that you're aware of? 14 A. I can't say that a consultant had 15 been at -- we had hired a consultant to work 16 with all of our elementary schools, and that 17 consultant had predominantly worked with 18 principals, assistant principals, teams from the 19 school. I don't know if that consultant 20 actually went to Trace Crossings. I can't tell 21 you that. 22 Q. Okay. 23 A. There was a team of people that was</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. What were they -- what does that -- 2 in non-education language, what were they 3 requesting there? 4 A. They were asking for additional 5 teachers, full-time positions. 6 Q. Did they tell you why? 7 A. Ms. Litaker wanted to have someone to 8 do enrichment type activities for students, and 9 she was going to use that extra position, those 10 extra positions to try to, if I remember 11 correctly, she was going to try to model 12 differentiation of instruction, how to teach, 13 you know. 14 Again, this gets into our education 15 needs, but if you're working with a child in a 16 remedial setting, that might be one type of 17 teaching, but if you're working with a child who 18 is very creative, very talented, you might have 19 to use other strategies. So there really is 20 different teaching methodologies there, and she 21 wanted the additional units to be able to help 22 model for other teachers, perhaps at Trace 23 Crossings, that differentiation approach.</p>
<p style="text-align: right;">Page 42</p> <p>1 recommended from this consultant to come in to 2 Trace Crossings to do an analysis of Trace 3 Crossings. 4 Q. That's a different -- that's not the 5 same team, though -- 6 A. That's different. 7 Q. -- that came in the fall of 2012, was 8 it? 9 A. No, sir. No. 10 Q. Were you part of the team, the 11 earlier team at Trace Crossings? 12 A. This was an outside team that came 13 in, based on the recommendation from that 14 consultant. 15 Q. And that outside team went to more 16 schools than just Trace Crossings, correct? 17 A. Yes, that's correct. 18 Q. And who was the principal when that 19 outside team came in? 20 A. I think it was Dot Riley. 21 Q. Okay. And you said they wanted 22 additional teacher unit resources? 23 A. Yes.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Okay. Did either Dr. Camp or Ms. 2 Litaker give you the reason they requested a 3 consultant? 4 A. Well, I remember in the meeting Dr. 5 Camp making a rationale of why she felt that 6 that was needed. The specifics of that, I don't 7 recall. 8 Q. And did they request during this 9 meeting that specific teachers be transferred 10 out? Did they give a list of teachers? 11 A. I remember two, Michael Wesley and 12 Stella White. 13 Q. What did Mr. Wesley teach? 14 A. Third grade. 15 Q. And Ms. White, what did she teach? 16 A. At that time, she was a Title 1 17 teacher. 18 Q. Were either of those two transferred 19 out? 20 A. No. 21 Q. Were they both tenured teachers? 22 A. Yes. 23 Q. And were there any other requests</p>

<p style="text-align: right;">Page 45</p> <p>1 made by Ms. Litaker or Dr. Camp at this meeting 2 that you recall? 3 A. Just any other request in general? I 4 mean, I don't -- 5 Q. At this meeting, you know, they 6 requested the three things that you told me 7 about. Was there anything else that they 8 brought up as far as requesting for Trace 9 Crossings? 10 A. Not that I remember. 11 Q. Okay. Did they make any -- was 12 anything discussed during this meeting other 13 than Trace Crossings? Let me ask this: Was 14 there any discussion about Ms. Litaker's role at 15 Trace Crossings during this meeting in July of 16 2012? 17 A. I don't understand your question. 18 It's difficult for me to answer your question, 19 because if you're asking did we talk about Ms. 20 Litaker specifically in terms of her duties at 21 the school, no. Did we talk about general 22 aspects of leadership at the school that would 23 involve Ms. Litaker's leadership, yes.</p>	<p style="text-align: right;">Page 47</p> <p>1 or what I recall of the meeting, I'm not sure it 2 was the purpose when we went in, but what 3 evolved in that meeting, it was a problem- 4 solving meeting, attempting to: What can we do 5 at central office to support you, Ms. Litaker, 6 based on the concerns that you and Dr. Camp have 7 raised? 8 Q. Okay. 9 A. So it wasn't a brow beating kind of 10 meeting. It was a very -- discussion. It was 11 input from one side to the other, and I don't 12 mean to say side. It was Dr. Camp and Ms. 13 Litaker had called the meeting. They had asked 14 for the meeting just with Mr. Craig. Mr. Craig 15 invited Dr. Dodson and I to the meeting. So I'm 16 not sure they knew we were going to be there 17 when we started the meeting out, but it really 18 was a problem solving, a dialog, a discussion 19 across the table of what can we do to help since 20 you've raised the concern. And in that meeting 21 it wasn't just test scores that were raised as a 22 concern from Ms. Litaker. She raised concerns 23 about staffing. So that was the discussion of</p>
<p style="text-align: right;">Page 46</p> <p>1 Q. Okay. What were those discussions? 2 A. Curriculum, you know, making sure we 3 were really focusing on the curriculum. Ms. 4 Litaker and Ms. Camp brought up the issue of the 5 test scores and their concern that they were not 6 pleased with the test scores. So the meeting 7 was about curriculum and curriculum development 8 and instructional delivery, and that very 9 definitely rests in the hands of the principal. 10 Q. And during this meeting, was Ms. 11 Litaker instructed to hold -- to do more to hold 12 the teachers accountable for adhering to the 13 curriculum? 14 A. No, not directly that that would be a 15 directive that was given to her, no. 16 Q. Was there any directive to her just 17 to hold the teachers -- to be on the teachers 18 more, to hold them more accountable? 19 A. There was no directive given in that 20 meeting at all. 21 Q. Was there any suggestion during the 22 meeting? 23 A. No. The whole purpose of the meeting</p>	<p style="text-align: right;">Page 48</p> <p>1 what can we do to help. 2 Q. And the concern about staffing, was 3 that the request to transfer the people? 4 A. Well, there were more concerns than 5 just those two people. 6 Q. What were the other concerns about 7 staffing? 8 A. I remember at one point the 9 discussion revolved around -- Ms. Litaker played 10 more of a secondary role. Dr. Camp pretty much 11 was the vocal person in that meeting. But at 12 one point Mr. Craig asked Ms. Litaker directly, 13 because Ms. Litaker kept going around the circle 14 about her teachers. She started out very 15 negatively about the teachers in general, about 16 teachers weren't doing this and teachers weren't 17 doing that. Mr. Craig at one point, very 18 specifically, looked at Ms. Litaker and said: 19 Do you have any good teachers at that school? 20 And then she came back and said: Yes, there are 21 some good teachers at that school. But it was a 22 kind of around-the-world discussion about 23 faculty and staff.</p>

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1 Q. And at some point during this
2 meeting, it was determined, or was it at this
3 meeting that it was determined there would be
4 some sort of team placed for support at Trace
5 Crossings?
6 A. Mr. Craig -- yes. Mr. Craig felt
7 very -- and I do want to explain that. Mr.
8 Craig felt very definitely we did not want to
9 hire a consultant because of the resources that
10 we had spent on prior consultants and we were
11 not seeing the results in terms of the money
12 that was going out for consultants and we
13 weren't seeing the impact that it was making on
14 our schools. So we were looking at what could
15 we do. And we really felt we had expertise
16 within our district to be able to help. We had
17 people who had the background in curriculum and
18 instruction, and we could give that support and
19 that help to Ms. Litaker.
20 Q. Okay.
21 A. So that's when that idea of the team
22 emerged and we weren't sure going into the
23 meeting. We knew we wanted to -- my

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1 recollection, we knew when we went into the
2 meeting we were going to be there to offer
3 support. Dr. Camp's suggestion was a
4 consultant. We did not want to go that route.
5 We felt we wanted to keep it in-house, what can
6 we do in-house because there's more follow-up
7 and follow through in-house. And in my
8 recollection, the idea of a team from central
9 office emerged in that meeting.
10 Q. Okay.
11 A. And that that's when we came up with
12 not all the details of that, but that it would
13 be a central office team that would be pulled
14 together to support Ms. Litaker. It was very
15 clear in that meeting that we wanted to make
16 sure Ms. Litaker chaired that. This is Ms.
17 Litaker's school and she needed to be the person
18 who took charge of that team.
19 Q. And before we go any further, I just
20 want to -- for the record, Exhibit 23 is the
21 notice of deposition. I probably should have
22 done this at the beginning of the deposition.
23 Have you seen this 30(b)(6) notice of

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1 deposition? Have you seen that before?
2 A. Oh, yes.
3 Q. And you're here testifying in your
4 individual capacity, but you're also here as the
5 representative on certain topics on behalf of
6 the Hoover School Board; is that right?
7 A. That's correct.
8 Q. And this is the response that your
9 attorney provided me that sets out the topics
10 that you were designated for.
11 A. Yes.
12 Q. And you reviewed that also, correct?
13 A. Yes, I have.
14 Q. Okay. I just wanted to clarify that
15 before we went too much further. Who -- was
16 there a follow-up meeting regarding this support
17 team that was going to be put into the -- going
18 to be used at Trace Crossings?
19 A. With -- a follow-up by who? Who
20 would be the members of that team?
21 Q. Yes.
22 A. Are you asking if I'm following up
23 with someone?

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1 Q. Well, no. After this meeting on July
2 11th and you discussed this team -- this team
3 concept was born, did you attend a meeting
4 afterwards where there was kind of fleshed out
5 more fully who would be on the team, what the
6 purpose of the team would be or was it all
7 discussed at this meeting we're talking about
8 here?
9 A. No. There were meetings that we had
10 afterwards to deal with details.
11 Q. You told me who was on the team.
12 When you say support, put in for support, what
13 does that entail? What did that entail as far
14 as Trace Crossings?
15 A. We had agreed that this team of six
16 people, including two Trace Crossings
17 administrators, four district people and two
18 from Trace Crossings, would meet regularly to
19 provide that attention to curriculum instruction
20 that Dr. Camp and Ms. Litaker had requested.
21 Part of that dealt with us being in classrooms,
22 doing walk-through in classrooms, looking at
23 what was being taught, how it was being taught,

<p style="text-align: right;">Page 53</p> <p>1 engagement of students, involvement of teachers 2 in team meetings, attending team meetings, 3 giving feedback, and our agreement was we were 4 always going to -- when we came in to do an 5 observation or any members of the team, when we 6 had an opportunity to observe dialogue, we were 7 getting back to Ms. Litaker.</p> <p>8 Ms. Litaker was going to take the 9 results then and share them with teachers. She 10 would be the organizer of the data. She would 11 be the person who would take those results and 12 go back to the teachers and give feedback to the 13 teachers. Ms. Litaker was also responsible for 14 pulling our team together, for making sure that 15 we had that regular constant dialogue across the 16 team members so we could kind of compare what 17 was going on, what was happening.</p> <p>18 So it was really, again, looking at 19 curriculum construction in the building and 20 helping her to make those changes that we knew 21 were necessary or that she wanted to make sure 22 that were occurring in classrooms at her school.</p> <p>23 Q. And when did the team, when did they</p>	<p style="text-align: right;">Page 55</p> <p>1 there's another planning meeting, TC planning. 2 Do you know, was that the team concept or do you 3 recall what that was about?</p> <p>4 A. I don't have the specifics of that. 5 No, I don't recall.</p> <p>6 Q. And then on the 31st, there's at 8:00 7 a.m. is the team planning, TC. Do you see that?</p> <p>8 A. I do. Team planning -- no. This is 9 during the summer. No. It was more or less 10 probably working out the details. Since it says 11 team planning, I'm going to assume it was 12 planning for this team concept working with Ms. 13 Litaker.</p> <p>14 Q. Okay. Now, if we look on August 9th 15 there's a TC entry after the new teachers. Do 16 you recall at all what that might have been?</p> <p>17 A. Probably this was a drop in. 18 Q. Okay.</p> <p>19 A. You know, when I visited the schools, 20 I didn't always announce to principals when I 21 was coming. Again, part of my role was just to 22 be there and be supportive of the principals. 23 So if I wanted to make sure I stopped to visit,</p>
<p style="text-align: right;">Page 54</p> <p>1 start going into the school and doing the 2 observations?</p> <p>3 A. Well, the difficulty here is that the 4 team was never called together. So I can't 5 speak for anybody other than my little team, 6 because to my recollection, we never had a group 7 meeting where Ms. Litaker pulled the whole team 8 back together again that I can remember.</p> <p>9 Q. Did you ever have any discussions 10 with Ms. Litaker about your result, what you had 11 observed?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Do you know if any of the 14 other team members had those meetings?</p> <p>15 A. I don't.</p> <p>16 Q. Okay. If you look at the next page 17 of your calendar, 16. You're already there? 18 There's a planning meeting with Ms. Litaker. 19 Was that related to this team concept? Do you 20 recall?</p> <p>21 A. I would assume so, but I can't say 22 that with certainty.</p> <p>23 Q. And the next week on the 25th,</p>	<p style="text-align: right;">Page 56</p> <p>1 I would always put it on the calendar and try to 2 remind myself I need to get over to that school. 3 So that was probably just a drop in.</p> <p>4 Q. Like on the next week on the 13th and 5 19th, there's just a lot of -- you visited a lot 6 of schools on those --</p> <p>7 A. I did. This was after institute and 8 Mr. Craig and I would make the rounds to all the 9 schools. This was like -- Monday, the 13th, was 10 institute day, more than likely, or this was -- 11 we didn't have a formal institute. This was the 12 first day of school with everyone back and you 13 will notice that we visited every one of the 14 schools in the district, yes.</p> <p>15 Q. Then on August 24th, and I'm not 16 going to go through every calendar.</p> <p>17 A. I hope not.</p> <p>18 Q. Robin and parent, do you recall at 19 all what that was about?</p> <p>20 A. This is what, year 2012? I remember 21 -- I remember a parent visit at Trace Crossings 22 with Robin that I met, but I don't know if it 23 was this one or not. I can't tell you</p>

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1 specifically.

2 Q. Well, look at September 11th.

3 A. September the 11th?

4 Q. Yes. At 10:00 a.m., there's a TC

5 third grade walk-through. Was that part of this

6 team support?

7 A. Yes.

8 Q. Was there a difference in what was

9 considered a walk-through and what was

10 considered an observation visit?

11 A. There is a difference, yes.

12 Q. Okay.

13 A. When you do an observation in a

14 classroom, you're spending a lot more time. A

15 walk-through is just coming in and kind of get a

16 general feel, take kind of a quick evaluation or

17 assessment of what's going on. Walk-throughs

18 are very short. Observations, you're there to

19 gather much more data.

20 Q. And then on the 12th of that week you

21 had a third grade team planning. Were you

22 meeting with the third grade teachers then?

23 A. It's math, during their math team

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1 meeting time.

2 Q. And then you had, on the 14th, a

3 walk-through and debriefing meeting. Is that

4 with Ms. Litaker?

5 A. What day did you say?

6 Q. The 14th.

7 A. This may have been where -- and I

8 didn't remember this, but since it was a walk-

9 through debriefing in the conference room, maybe

10 there was a meeting where more than just Ms.

11 Litaker and I got together. It may have been --

12 Dr. Dodson may have been there, or maybe Dr.

13 Camp. Since obviously it's a debriefing, it's

14 more than just Ms. Litaker and I.

15 Q. And I believe you've told me when you

16 did your visits, your walk-throughs, Ms. Stone

17 was with you typically?

18 A. Yes.

19 Q. Okay. On October 25th, and this may

20 not have anything to do with anything, there's

21 something called a threat assessment. What is

22 that?

23 A. Where are you?

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1 Q. Thursday, October 25th.

2 A. That was part of my responsibilities

3 to develop a threat assessment protocol for

4 Hoover City Schools, and I worked with our

5 intervention counselors to do that. That was a

6 district wide protocol that we were putting in

7 place.

8 Q. If you'll look at October 30th,

9 there's an entry at 2:00 p.m., a meeting with

10 Robin regarding partnerships. Do you remember

11 what that was about?

12 A. I'm assuming that dealt with the

13 Samford partnerships.

14 Q. Okay. And then on the 2nd of

15 November at the bottom of that page, there's a

16 meeting with Robin, Tamala, Dana and Mary. Who

17 is Tamala?

18 A. That is not -- that's Tamala Maddox.

19 That's not Robin Litaker.

20 Q. Okay. Is Dana Dana Joyner?

21 A. No.

22 Q. Okay. On the next page there's a

23 meeting on the 7th, on November 7th at 10:30,

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1 bus issues TC. Do you recall, was that relating

2 to anything with teachers having to cover bus

3 duty before or after their contract?

4 A. I don't remember what that meeting

5 was. I really don't have any recollection of

6 that.

7 Q. And then we look on the --

8 A. I know what it was. I know what it

9 was. It was a -- no, it wasn't. No, I'm sorry.

10 Q. And I understand --

11 A. Because I'm looking at timelines.

12 Q. If I had my calendar and I had to

13 look at my calendar --

14 A. I'm trying to look at what happened

15 before and what happened after I went to Trace

16 Crossings. That's two different issues.

17 Q. That's fine. Let's look at the 15th.

18 On Thursday the 15th at 4:00 to 5:30, there's a

19 meeting with Robin and Andy. Do you see that?

20 A. Yes.

21 Q. And that's where Ms. Litaker was

22 informed of her move out of Trace Crossings,

23 correct?

<p style="text-align: right;">Page 61</p> <p>1 A. That's correct.</p> <p>2 Q. There's a meeting with Ms. Litaker on</p> <p>3 the 12th at central office. The same week as</p> <p>4 her being moved out, do you recall anything</p> <p>5 about meeting with her on that Monday prior to</p> <p>6 her being informed of her transfer?</p> <p>7 A. Again, I can't -- I think if it's --</p> <p>8 that was probably -- I don't remember what</p> <p>9 exactly was discussed in that meeting, but I do</p> <p>10 remember calling Robin in. I was having a very,</p> <p>11 very difficult time keeping Robin's attention in</p> <p>12 her office when we met. And things had</p> <p>13 escalated to the point that I felt that I needed</p> <p>14 to have her direct individual attention, and I</p> <p>15 asked her to come to my office to meet.</p> <p>16 And, again, I'm not sure what we</p> <p>17 discussed during that time, but I needed -- Ms.</p> <p>18 Litaker had a big window in her office, and her</p> <p>19 desk stood right in front of that big window</p> <p>20 where she could look out in the hallway and</p> <p>21 anybody who walked out in the lobby area, you</p> <p>22 could see. It was very difficult -- by that</p> <p>23 time, it was very difficult for me to keep</p>	<p style="text-align: right;">Page 63</p> <p>1 directive, but in this meeting I did give her a</p> <p>2 directive.</p> <p>3 Q. And what was that?</p> <p>4 A. I told her to take that duty schedule</p> <p>5 down and change it, because she can't require</p> <p>6 teachers to be there outside of their duty</p> <p>7 hours. And I asked her -- I asked for her to</p> <p>8 take that down. At that time, Ms. Litaker said</p> <p>9 that she was very adamant that that duty</p> <p>10 schedule wasn't her schedule, it was Ms. Stone's</p> <p>11 schedule. I said I don't care who did it, that</p> <p>12 schedule needed to be removed, because it was a</p> <p>13 contractual issue and teachers were raising cain</p> <p>14 about it and that we needed to get rid of that</p> <p>15 and we needed to work on a different plan. That</p> <p>16 did not happen.</p> <p>17 Q. Okay. At that point, had you already</p> <p>18 had -- had you had any discussions with Mr.</p> <p>19 Craig about removing Ms. Litaker from the</p> <p>20 school?</p> <p>21 A. Actually, I don't think we did, not</p> <p>22 to my memory.</p> <p>23 MR. JENT: Okay. I need to take a</p>
<p style="text-align: right;">Page 62</p> <p>1 Robin's attention on the discussion that we were</p> <p>2 having. It was people would walk by and she</p> <p>3 would wave or people would walk by and she would</p> <p>4 pull them into the office, or it was always</p> <p>5 looking around here. It was hard for me to keep</p> <p>6 and focus her attention on me and what the</p> <p>7 topics were. And I felt at that stage I needed</p> <p>8 to have that full attention. I know what that</p> <p>9 meeting was about.</p> <p>10 Q. What was it about?</p> <p>11 A. Duties of teachers. That was a real</p> <p>12 serious one. That was that -- that happened</p> <p>13 then, because teachers were complaining and I</p> <p>14 had -- an AEA representative had talked with me</p> <p>15 about complaints, contractual complaints in</p> <p>16 teachers.</p> <p>17 Q. And that was Dana?</p> <p>18 A. Dana Clement.</p> <p>19 Q. Clement, that's it. I used the wrong</p> <p>20 name earlier.</p> <p>21 A. And she -- that was -- I called Robin</p> <p>22 because I felt that was extremely serious and,</p> <p>23 in fact, I rarely, rarely gave Robin a</p>	<p style="text-align: right;">Page 64</p> <p>1 restroom break if that's okay.</p> <p>2 (Whereupon, a brief recess was</p> <p>3 taken.)</p> <p>4 Q. All right. Did you ever have any</p> <p>5 discussions with Ms. Litaker about moving Ms.</p> <p>6 Stone out of Trace Crossings from the assistant</p> <p>7 principal position?</p> <p>8 A. Not that I remember.</p> <p>9 Q. Do you ever recall any communications</p> <p>10 with Ms. Litaker where she expressed that she</p> <p>11 was having problems with Ms. Stone?</p> <p>12 A. Yes.</p> <p>13 Q. What do you recall?</p> <p>14 A. Ms. Litaker shared with me just,</p> <p>15 again, what I can remember, general discontent,</p> <p>16 that she didn't think Ms. Stone was an effective</p> <p>17 assistant principal.</p> <p>18 Q. Did you ever suggest that Ms. Litaker</p> <p>19 move Ms. Stone or transfer Ms. Stone?</p> <p>20 A. No.</p> <p>21 Q. Or non-renew Ms. Stone?</p> <p>22 A. No.</p> <p>23 Q. Did you ever discuss Ms. Stone's</p>

<p style="text-align: right;">Page 65</p> <p>1 non-renewal with Ms. Litaker?</p> <p>2 A. Ask that question again.</p> <p>3 Q. Yes. Did you ever discuss</p> <p>4 non-renewal of Ms. Stone with Ms. Litaker?</p> <p>5 A. I don't recall a discussion of that.</p> <p>6 I will tell you what I would normally do if a</p> <p>7 principal was discussing inappropriate or</p> <p>8 ineffective or inefficient practices by anyone</p> <p>9 that they are supervising. Whether it be an</p> <p>10 assistant principal or counselor or teacher, my</p> <p>11 recommendation would be to put them on a plan</p> <p>12 and start working with them in terms of what you</p> <p>13 expect, because many times it's the labeling of</p> <p>14 expectations that gets people into what -- so I</p> <p>15 could see myself having that conversation with</p> <p>16 her about just not a -- I don't ever recall</p> <p>17 talking about removing her, dismissing her, no.</p> <p>18 Q. And if you supervised somebody that</p> <p>19 wasn't performing as you thought they should,</p> <p>20 would one of the things you consider putting</p> <p>21 them on some kind of improvement plan?</p> <p>22 A. I would have discussions with that</p> <p>23 person about expectations.</p>	<p style="text-align: right;">Page 67</p> <p>1 Was Paige -- Paige and her aides, Paige was a</p> <p>2 special education teacher?</p> <p>3 A. That's correct.</p> <p>4 Q. And just generally, Ms. Paige and her</p> <p>5 aides were having to cover the fourth grade --</p> <p>6 to watch the fourth grade classes while the</p> <p>7 teachers were in a meeting?</p> <p>8 A. That was my understanding, yes.</p> <p>9 Q. And did you talk to Ms. Litaker about</p> <p>10 that complaint?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And what did Ms. Litaker tell</p> <p>13 you?</p> <p>14 A. Ms. Litaker explained to me that this</p> <p>15 was a meeting where she had pulled together the</p> <p>16 fourth grade team, because there was a lot of</p> <p>17 dissension among the fourth grade team members.</p> <p>18 And she was tired of them constantly</p> <p>19 complaining, not working together. So she</p> <p>20 pulled them into the office for -- to try to</p> <p>21 work it out, work their differences out.</p> <p>22 Q. And that was something she was doing</p> <p>23 to try to address the problems that you had told</p>
<p style="text-align: right;">Page 66</p> <p>1 Q. I want to talk about some complaints</p> <p>2 that you may have received either about Ms.</p> <p>3 Litaker or about Trace Crossings in general,</p> <p>4 okay? And I'm looking at Exhibit 15, which is</p> <p>5 the interrogatory responses, Page 12. And I'll</p> <p>6 just ask you about at the bottom, it says:</p> <p>7 Barber received a report from a teacher, Aleshia</p> <p>8 Paige, about not being able to perform her IEP</p> <p>9 duties because plaintiff was having her and her</p> <p>10 aides cover classes. And it's Aleshia,</p> <p>11 A-l-e-s-h-i-a, and Paige with an i.</p> <p>12 Q. Do you recall when that report was?</p> <p>13 A. It was either October or November of</p> <p>14 '12, 2012. I can't recall the specific time or</p> <p>15 date.</p> <p>16 Q. The report from Paige, was it a phone</p> <p>17 call, e-mail?</p> <p>18 A. It was a phone call.</p> <p>19 Q. And apparently the report --</p> <p>20 according to the interrogatory, the report was</p> <p>21 triggered by a lengthy meeting that Ms. Litaker</p> <p>22 had with the fourth grade team which caused</p> <p>23 Paige and her aides to not fulfill their duties.</p>	<p style="text-align: right;">Page 68</p> <p>1 me about before that you had noticed of teachers</p> <p>2 not communicating, not getting along at the</p> <p>3 school, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Did she indicate whether or not that</p> <p>6 meeting was successful?</p> <p>7 A. Ms. Litaker?</p> <p>8 Q. Yes.</p> <p>9 A. When you say she?</p> <p>10 Q. Yes, Ms. Litaker.</p> <p>11 A. Ms. Litaker felt it was successful.</p> <p>12 Q. Did you talk to any of the fourth</p> <p>13 grade teachers after that meeting?</p> <p>14 A. I did not at that time.</p> <p>15 Q. Before Ms. Litaker was moved, did you</p> <p>16 talk to any of the fourth grade teachers about</p> <p>17 that meeting?</p> <p>18 A. No.</p> <p>19 Q. And the meeting with teachers, did</p> <p>20 that have to take place during their -- if it</p> <p>21 was a mandatory meeting, it had to take place</p> <p>22 during their contract hours similar to what we</p> <p>23 were discussing about the --</p>

<p style="text-align: right;">Page 69</p> <p>1 A. What meeting with teachers?</p> <p>2 Q. The meeting Ms. Litaker had with the</p> <p>3 teachers here, that we're talking about here,</p> <p>4 would that have to take place during the, I</p> <p>5 guess, during their contract hours?</p> <p>6 A. Again, that's not a yes, no answer.</p> <p>7 Q. Okay.</p> <p>8 A. You have, as a principal, the right</p> <p>9 to call faculty meetings, and teachers know that</p> <p>10 that's going to go beyond their contract time.</p> <p>11 Typically that's at least one time per week.</p> <p>12 Q. Okay.</p> <p>13 A. And you put that on the calendar and</p> <p>14 people know faculty meetings, like at our</p> <p>15 school, particularly, faculty meetings is from</p> <p>16 3:00 to 4:00. That goes outside their contract</p> <p>17 hour. Now, can I require a teacher to be there</p> <p>18 from 3:00 to 4:00? No. Can I ask a teacher to</p> <p>19 be there and if your climate and your culture in</p> <p>20 the building is positive and it's okay, they're</p> <p>21 going to come.</p> <p>22 So, typically, those kind of meetings</p> <p>23 would occur after school or before school, or</p>	<p style="text-align: right;">Page 71</p> <p>1 A. Again, do you want me to respond to</p> <p>2 it about what I knew at that time --</p> <p>3 Q. Yes.</p> <p>4 A. -- or what I knew about afterwards?</p> <p>5 Q. What you knew at that time.</p> <p>6 A. At that time I did not question her</p> <p>7 calling the meeting. I questioned the time she</p> <p>8 called it during when the teachers had contact</p> <p>9 with children, but I did not question her</p> <p>10 calling a meeting.</p> <p>11 Q. Did she give a reason why she called</p> <p>12 it when she did, the time she called it?</p> <p>13 A. Not that I recall.</p> <p>14 Q. Okay. And later on, after she was</p> <p>15 gone from Trace Crossings, did you have a</p> <p>16 different view of this meeting?</p> <p>17 A. Very definitely.</p> <p>18 Q. What was your --</p> <p>19 A. When Ms. Litaker shared the meeting</p> <p>20 with me, I felt her feeling was that it was a</p> <p>21 problem-solving meeting and that people left</p> <p>22 having kind of resolved issues. When I heard</p> <p>23 from teachers about the meeting, it was</p>
<p style="text-align: right;">Page 70</p> <p>1 even if it's during the school day, it would be</p> <p>2 during their team time. They had an hour block.</p> <p>3 Three days a week there's an hour block of</p> <p>4 planning time. So if it had to be, if Ms.</p> <p>5 Litaker felt the need to do it during the school</p> <p>6 day, which I think in this situation she</p> <p>7 probably did, why wasn't it held during a team</p> <p>8 time when they didn't have children?</p> <p>9 Q. And then the next complaint is about</p> <p>10 a letter. We've got it in our stack somewhere.</p> <p>11 It's Exhibit 5. You can leave that open, if you</p> <p>12 will, on Page 13.</p> <p>13 A. What was the page, 13?</p> <p>14 Q. You don't have to, but you're going</p> <p>15 to have to turn back to it.</p> <p>16 A. Which one did you say?</p> <p>17 Q. Exhibit 5.</p> <p>18 A. Yes, I have it.</p> <p>19 Q. Well, did Ms. Litaker do anything</p> <p>20 wrong by calling the team meeting when she did</p> <p>21 at the time Ms. Paige was complaining about it?</p> <p>22 MS. YUENGERT: Object to the form.</p> <p>23 You can answer.</p>	<p style="text-align: right;">Page 72</p> <p>1 completely a hundred eighty degree different.</p> <p>2 It was a very confrontational meeting. It was,</p> <p>3 teachers did not have -- there was no -- Ms.</p> <p>4 Litaker called the meeting, but Ms. Litaker did</p> <p>5 not provide direction and facilitate that</p> <p>6 meeting, and the teachers were very angry with</p> <p>7 one another. There was quite an amount of</p> <p>8 dissension among that group of teachers.</p> <p>9 Some teachers were dismissed. Some</p> <p>10 were kept back. At one point, I understand one</p> <p>11 teacher attempted to get up and leave, and Ms.</p> <p>12 Litaker chastised her and told her to sit back</p> <p>13 down until she told her she could leave. It was</p> <p>14 very confrontational. Ms. Litaker did not</p> <p>15 facilitate a resolution to the concerns. She</p> <p>16 allowed the teachers to just continue the</p> <p>17 bickering back and forth. That's the side I</p> <p>18 heard from teachers. I did not hear that from</p> <p>19 Ms. Litaker.</p> <p>20 Q. And when did you hear that from the</p> <p>21 teachers?</p> <p>22 A. That was after I came to Trace</p> <p>23 Crossings.</p>

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1 Q. Did you report that to Mr. Craig?

2 A. Actually, I think the time I really

3 got that kind of story was when we began to get

4 involved in this litigation. And did I report

5 it to Mr. Craig at that stage? I don't recall

6 if I reported that specific incident to Mr.

7 Craig or not.

8 Q. All right. The next topic we're

9 going to look at here is this August letter

10 that's signed by several concerned Trace

11 Crossings teachers. Did you receive this -- how

12 did you receive this letter?

13 A. It came through the pony, our

14 internal, because it's stamped, so that would

15 have been Ms. White stamping it. It came

16 through the pony.

17 Q. And I notice a Ms. White maybe on

18 your calendar. Was that your assistant?

19 A. Ms. White was the administrative

20 assistant to Mr. Craig and to me.

21 Q. And that's Louise?

22 A. Yes.

23 Q. Now, when you received this letter,

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1 did you share it with Ms. Litaker?

2 A. No.

3 Q. Did you share it with Mr. Craig?

4 A. No.

5 Q. Did you share it with Ms. Veal?

6 A. No.

7 Q. What did you do when you received

8 this letter?

9 A. Typically, when I get letters like

10 this that are not signed, they don't raise a lot

11 of red flags in my mind, because if a person

12 doesn't have the courage to put their name on

13 it, I don't put a lot of validity in the content

14 of the letter. In fact, in this letter, it says

15 they would like to -- whoever wrote it or they,

16 she, he would like the opportunity to speak, but

17 I have no way of following up because I don't

18 even know who wrote it. So no, it went -- I had

19 a file system, and I had a file for Trace

20 Crossings, and it went in the Trace Crossings

21 file.

22 Q. The letter is dated August 10th and

23 received August 14th. Is there any way you can

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1 look at your calendar and tell me when the

2 school year started --

3 A. Yeah, I can.

4 Q. -- in 2012?

5 A. It was that day that -- where did the

6 calendar go. It was that day that there were so

7 many meetings.

8 Q. So the 13th maybe?

9 A. Hold on. Where Mr. Craig and I went

10 out to all of those schools would have been the

11 first day of school that year, I'm sure. Hold

12 on. Yes. Now, that would be the first day that

13 teachers would have reported back, all teachers,

14 all staff would have reported back on August

15 13th.

16 Q. And this was received, at least

17 stamped by Ms. White as received on the 14th,

18 correct?

19 A. Correct.

20 MS. YUENGERT: When you say "this"

21 you're talking about Plaintiff's Exhibit 5.

22 MR. JENT: Exhibit 5, yeah. I'm

23 sorry. I knew what I was talking about.

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1 Q. Had there been any meetings that you

2 were aware of? Prior to August 14th, had there

3 been a faculty meeting at Trace Crossings with

4 Ms. Litaker and the faculty?

5 A. Ask that question again.

6 Q. Yeah. I guess what I'm trying to get

7 at is, was there anything -- this letter was

8 received on the 14th. It's dated August 10th,

9 but we don't really know. We know when it was

10 received, and that's about all we know. Is

11 there anything you're aware of in the summer of

12 2012 that would have happened in the summertime

13 period there that would have prompted this

14 letter being sent when it was sent?

15 A. Not that I can remember.

16 Q. Okay. The next paragraph on Exhibit

17 15, the interrogatory responses, it details some

18 complaints that Mary Veal received from

19 employees, and Ms. Veal talked about those. Did

20 Ms. Veal make you aware of any of these

21 complaints and it's on Page 13. It's starting

22 with, During plaintiff's time as principal, Mary

23 Veal received complaints, and there's a list of

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1 people. Were you aware of those during the --
2 before Ms. Litaker was removed?
3 A. Before Ms. Litaker was removed?
4 Q. Yes.
5 A. Yes.
6 Q. Did you ever address any of those
7 complaints with Ms. Litaker?
8 A. Ms. Litaker and I, as you well know,
9 we met regularly, and if Ms. Veal -- when Ms.
10 Veal shared a concern that had come in, although
11 she may not have shared a name, in those
12 conversations when I would be meeting with Ms.
13 Litaker, I would always try to work -- if there
14 was a concern, I'm going to work it into the
15 conversation. If this was confidential, and
16 some of these were, because Ms. Veal said she --
17 some of the people wanted to remain anonymous.
18 So I may not have even known who the complaint
19 was from, but if there was a complaint that had
20 been shared, then as I met with Ms. Litaker, I'm
21 going to work that into the conversation some
22 way, yes.
23 Q. Okay. As assistant superintendent,

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1 were you aware that at Trace Crossings at this
2 time there was a group of teachers who were in
3 the Debra Smith camp, more pro Debra Smith and
4 maybe were opposed to Ms. Smith not receiving
5 the principal position at Trace Crossings?
6 A. Did I know that?
7 Q. Yes.
8 A. No.
9 Q. Did you learn of it later?
10 MS. YUENGERT: And what time are you
11 talking about?
12 Q. After you became principal at Trace
13 Crossings.
14 A. That there was a Debra --
15 Q. I would call it the pro Debra Smith
16 group. They had supported her bid to become
17 principal?
18 A. No, no.
19 Q. And that there was a group that did
20 not want Ms. Litaker as principal from the
21 beginning? Were you aware of that?
22 A. A group of teachers at Trace
23 Crossings who didn't want Ms. Litaker as

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1 principal?
2 Q. Yes.
3 A. No.
4 Q. You did know that Ms. Smith had filed
5 a complaint with the EEOC about not receiving
6 the principal position?
7 A. Yes.
8 Q. Did you ever -- was there ever any
9 written documentation when you would meet with
10 Ms. Litaker and sort of work in these concerns
11 that maybe had been raised with Ms. Veal, did
12 you ever make any written documentation of those
13 conversations?
14 A. My notes that I kept when I went to
15 Trace Crossings, my general protocol when I took
16 notes, whether it was a meeting conference that
17 we had, because, again, remembering this team
18 that we're working on, Ms. Litaker is the chair
19 of this team. She's the principal of the
20 building. We're there as support for her. So
21 any notes that I might have, I always turned
22 those notes over to her when I left that
23 building.

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1 Q. Even notes of meetings with her?
2 A. Yes. I mean, we may be sitting there
3 and I may be taking some notes, but as we're
4 talking, I felt an obligation to give those
5 notes to Ms. Litaker because our expectation was
6 she's the principal. She's going to handle it
7 back at the school level.
8 Q. Okay. Have you seen those -- did you
9 ever see any of those notes again after you gave
10 them to Ms. Litaker?
11 A. Not that I can remember.
12 Q. Okay. And even after you became
13 principal and were in the building and the
14 offices?
15 A. No, no.
16 Q. And then the next paragraph there
17 that's on Page 13 starts, In the fall of 2012.
18 I think we've discussed this issue. This is the
19 AEA UniServ director. This was the complaint
20 about the teachers working outside of their
21 contract hours?
22 MS. YUENGERT: Kevin, I'm not sure if
23 you've discussed that with Ms. Barber. I know

<p style="text-align: right;">Page 81</p> <p>1 that you've covered it with Ms. Veal. I'm just 2 not sure you talked to her about it. 3 Q. We did talk about you meeting with 4 Ms. Litaker regarding that complaint, though, 5 right? 6 A. Which complaint? 7 Q. About the teachers working outside 8 their contract hours? 9 A. Yes, I did meet with Ms. Litaker 10 about that. 11 Q. Prior to that, you had met with Ms. 12 Clement, Dana Clement and Ms. Veal, correct? 13 A. Right. 14 Q. Did Ms. Clement express any concerns 15 to you during that meeting other than the 16 complaint about the contract hours, the teachers 17 working outside the contract hours? 18 A. Ask me that question again. 19 Q. Yeah. I'll show you what -- you had 20 a meeting -- you've told me that you talked to 21 Ms. Litaker about the schedule? 22 A. The duty schedule. 23 Q. The duty schedule?</p>	<p style="text-align: right;">Page 83</p> <p>1 Q. Well, typically are assistant 2 principals eligible to be members of AEA? 3 A. All employees are eligible to be 4 members of AEA. 5 Q. Okay. Do you recall receiving any 6 information from Ms. Clement, such as this 7 e-mail about Ms. Stone, there being concerns 8 about Ms. Stone, blame being placed on Ms. Stone 9 and issues with Ms. Stone? 10 A. Again, I've got to have you repeat 11 that. I'm just not -- I didn't hear that 12 question. 13 Q. It's late in the day. Do you recall 14 there being an issue brought to you by Dana 15 Clement related to concerns about Ms. Stone? 16 A. That Ms. Clement brought to me about 17 Ms. Stone? 18 Q. Yes. 19 A. No, I don't. This would be the only 20 time that I can remember her saying anything 21 about Ms. Stone. 22 Q. Did you ever address any issues with 23 Ms. Litaker about Ms. Stone?</p>
<p style="text-align: right;">Page 82</p> <p>1 A. Yes. 2 Q. And that was a result of meeting with 3 Ms. Clement? 4 A. Right. 5 Q. Did she bring any other concerns to 6 you at that time other than the duty schedule? 7 A. I really don't remember. 8 Q. Okay. 9 A. I would have to -- I really don't 10 remember. 11 (Plaintiff's Exhibit No. 32 was 12 marked for identification.) 13 Q. Exhibit 32 is an e-mail from Dana 14 Clement to you and copies to Ms. Veal, a 15 follow-up of your meeting. Do you recall 16 receiving that? 17 A. Well, I don't recall, but it's 18 addressed to me, so yes, it was sent to me by 19 Ms. Clement. 20 Q. Okay. Now, Ms. Stone, was she a 21 member -- as assistant principal, was she a 22 member of AEA? 23 A. I wouldn't have that information.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. We talked about Ms. Stone on several 2 occasions, yes. 3 Q. And you knew Ms. Litaker had some 4 issues with Ms. Stone, correct? 5 A. Ms. Litaker brought -- Ms. Litaker 6 shared with me concerns about Ms. Stone, yes, 7 and we discussed those in some of our meetings. 8 Q. When you were doing your walk-through 9 with Ms. Stone did Ms. Stone ever share any 10 concerns with you about Ms. Litaker? 11 A. No. 12 Q. Did you ever have a meeting with Ms. 13 Stone and with Ms. Veal about concerns Ms. Stone 14 had about being at Trace Crossings? 15 A. Yes. 16 Q. And look at Exhibit 27. Do you have 17 it? It's that. 18 A. That's 26. 19 Q. Oh, I've got the wrong number here. 20 Exhibit 26. 21 A. I don't think I have a 27 or I don't 22 see a 27. Here's 27. 23 Q. Okay. I have the wrong number</p>

<p style="text-align: right;">Page 85</p> <p>1 written on mine.</p> <p>2 MS. YUENGERT: Are you looking at her</p> <p>3 notes?</p> <p>4 MR. JENT: The notes, yeah.</p> <p>5 A. That's 26.</p> <p>6 Q. Are these your notes?</p> <p>7 A. Those are my notes, yes.</p> <p>8 Q. And it reflects a meeting with Amanda</p> <p>9 Stone and Mary Veal, correct?</p> <p>10 A. That's correct.</p> <p>11 Q. Where did this meeting take place?</p> <p>12 A. That was in my office.</p> <p>13 Q. And it's on your calendar, it looks</p> <p>14 like, for Monday the 15th?</p> <p>15 MS. YUENGERT: Of October?</p> <p>16 Q. Of October, yes.</p> <p>17 A. Yes.</p> <p>18 Q. How did this meeting come about?</p> <p>19 A. Ms. Stone had spoken to Ms. Veal, and</p> <p>20 Ms. Veal had finally convinced Ms. Stone that I</p> <p>21 needed to have some information and that she</p> <p>22 felt that -- I'm remembering what Mary told me,</p> <p>23 that she felt that Ms. Stone needed to talk with</p>	<p style="text-align: right;">Page 87</p> <p>1 talking to her about these issues?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did you provide any sort of</p> <p>4 written corrective action plan, any future</p> <p>5 action plan concerning any of these issues</p> <p>6 brought up by Ms. Stone?</p> <p>7 A. No.</p> <p>8 Q. Did you ever suggest having a meeting</p> <p>9 sort of with you and Ms. Veal and Ms. Stone and</p> <p>10 Ms. Litaker to go over any issues?</p> <p>11 A. Did I ever suggest that to whom?</p> <p>12 Q. To Ms. Litaker and Ms. Veal.</p> <p>13 A. No.</p> <p>14 Q. In your dealings with Ms. Litaker,</p> <p>15 did you find her to be paranoid?</p> <p>16 A. This is October the 15th. At this</p> <p>17 stage, I would -- I know I had a feeling that</p> <p>18 Ms. Litaker was very fragile. Paranoid is not a</p> <p>19 word I would have used at that stage, but I know</p> <p>20 that she was very fragile, and I'm going to use</p> <p>21 the word overwhelmed because, again, when I talk</p> <p>22 about focus issues and having her be able to</p> <p>23 communicate with me, my perception, Ms. Litaker</p>
<p style="text-align: right;">Page 86</p> <p>1 me directly. From what I recall that situation,</p> <p>2 Ms. Stone was extremely reluctant to come and</p> <p>3 visit with me, and Ms. Veal convinced her that</p> <p>4 that really was important, so I heard firsthand</p> <p>5 from her not translated through Ms. Veal. So</p> <p>6 Ms. Veal convinced her to set this meeting time</p> <p>7 up, a meeting with me that we did this in my</p> <p>8 office.</p> <p>9 Q. And notes, these are the notes you</p> <p>10 took down of what was discussed during the</p> <p>11 meeting?</p> <p>12 A. Yes.</p> <p>13 Q. Did you ever share any of these</p> <p>14 concerns that are reflected in these notes with</p> <p>15 Ms. Litaker?</p> <p>16 A. As you can tell, there were a lot of</p> <p>17 issues brought up in that meeting, and yes, I</p> <p>18 did talk to Ms. Litaker about a lot of these</p> <p>19 things that came up.</p> <p>20 Q. Did you talk to her in a, hey, we've</p> <p>21 got to watch out for this kind of way, and this</p> <p>22 is a bad question, I know. Were you</p> <p>23 disciplining her in any way when you were</p>	<p style="text-align: right;">Page 88</p> <p>1 was totally overwhelmed at Trace Crossings,</p> <p>2 preventing her from being able to focus, from</p> <p>3 her following through on issues.</p> <p>4 And then particularly when I got the</p> <p>5 information, this is her choice, Ms. Litaker</p> <p>6 selected Ms. Stone. When we moved Dr. Smith</p> <p>7 out, Ms. Litaker had the choice to choose</p> <p>8 whomever she wanted as an assistant principal.</p> <p>9 So this was Ms. Litaker's, her personal choice</p> <p>10 as an assistant principal. And when you have --</p> <p>11 you know, assistant principal and principal have</p> <p>12 to work very, very closely as a team. And when</p> <p>13 you have an assistant principal coming to you</p> <p>14 with these kinds of issues, that was a major red</p> <p>15 flag in my mind.</p> <p>16 And as I said, I felt at this stage</p> <p>17 she was becoming very fragile. I was very</p> <p>18 cautious about how much information I gave to</p> <p>19 her. I wanted to focus it. Keep it very</p> <p>20 narrow, things that she could tangibly work on,</p> <p>21 helping her, supporting her, giving her that</p> <p>22 help and assistance to try to pull things</p> <p>23 together to go forward to take the school</p>

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1 forward.
2 Q. Okay. And this was in the October
3 time period?
4 A. This was middle of October.
5 Q. And were you concerned or were any
6 red flags raised about the complaints Ms.
7 Litaker was making about Ms. Stone to you?
8 A. Ms. Litaker -- yes, I was. I talked
9 to Ms. Litaker about that. As I said before,
10 Ms. Litaker was concerned about Ms. Stone and I
11 recommended at that point, label behaviors for
12 her, make sure she knows what your expectations
13 are. She also was a new assistant principal.
14 She hadn't had assistant principal experience
15 before. So that role was relatively new for
16 her.
17 Q. Okay. Did you report any of these
18 concerns raised by Amanda Stone to Mr. Craig?
19 A. I more than likely at that point said
20 something to Mr. Craig. I can't recall a
21 conversation, but I'm sure I would have
22 highlighted or red flagged for him that there
23 was some discourse between or discontent between

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1 a principal and assistant principal in the
2 school. That would have been my typical
3 behavior, yes.
4 Q. But you don't recall specifically?
5 A. I don't recall a specific
6 conversation I had with him about it, but I
7 would think I would have mentioned it to him.
8 Q. Did you talk to any other teachers or
9 staff at Trace Crossings after this meeting with
10 Ms. Stone to kind of get any other feel for what
11 was going on out there?
12 A. No. I felt very strongly I was there
13 to support Ms. Litaker, and I would bring things
14 to Ms. Litaker's attention. She was the
15 principal in this building. I in no way, shape
16 or form wanted to usurp her authority.
17 The other thing is, if I go in and
18 start talking to teachers -- I'm a central
19 office person, and if I go in and start asking
20 questions about Ms. Litaker, that's a fire storm
21 waiting to get going in that building.
22 Absolutely not.
23 Q. How did it come about that you

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1 learned that Mr. Craig was considering moving
2 Ms. Litaker from Trace Crossings?
3 A. He told me.
4 Q. Okay.
5 A. Excuse me. We discussed it. We
6 discussed it.
7 Q. When was that discussion?
8 A. Again, things were spiraling down or
9 ratcheting up, however you want to look at it.
10 The first I can remember us discussing the
11 movement of Ms. Litaker was that week we moved
12 her.
13 Q. Okay. Let's look at the calendar
14 just to get an idea of what we're talking about
15 here. She was moved -- I believe if we look at
16 November 15th, that's the day she was informed
17 of her move?
18 A. Yes, Thursday.
19 Q. And there's a meeting on there on
20 Monday. Would it have been around Monday,
21 Tuesday, or Wednesday when you talked with Mr.
22 Craig?
23 A. It would have probably been Tuesday

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1 or Wednesday where we had discussions. You
2 know, we may have had some discussion that week
3 before, but this was not a discussion that was
4 in process for a long period of time. It was
5 when we saw things were beginning to spiral and
6 deteriorate we felt we had to take some action.
7 And particularly because I did feel -- I felt,
8 my perception was that Ms. Litaker was
9 overwhelmed and the complaints were coming in.
10 It didn't appear that it was going to improve.
11 Q. Was there any one event that prompted
12 the decision to be made right when it was?
13 A. No.
14 Q. Okay. And Mr. Craig made the
15 decision?
16 A. That would be the superintendent's
17 decision, yes, sir.
18 Q. And did you discuss with Mr. Craig
19 maybe having some kind of meeting or discussion
20 with Ms. Litaker about these problems to give
21 her a chance to try to correct them before she
22 was moved?
23 A. We had discussed it and we did have a

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1 plan.

2 Q. Okay. And had it been discussed in

3 these planning meetings you had told me about?

4 A. We started in the summer providing

5 her with the support, a team of people that were

6 coming into the building and helping her and

7 meeting with her and talking to her about

8 issues. So there was that ongoing dialogue.

9 So, yes, that was discussed and there was that

10 plan.

11 Q. But in the summer there was no really

12 identified problem, correct?

13 A. They brought a problem up to our

14 attention. Yes, there was an identified

15 problem.

16 Q. That problem they identified with the

17 test scores?

18 A. Test scores, concerns about staffing.

19 Q. But not concerns about Ms. Litaker?

20 A. No, sir, no.

21 Q. After it was determined there were

22 concerns with Ms. Litaker, was there ever a

23 meeting and a plan put forth at that point?

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1 MS. YUENGERT: Object to the form.

2 You can answer.

3 A. The concern was not -- the concern

4 was not about Ms. Litaker from the standpoint of

5 -- I take that back. Let me rephrase that. I

6 felt Ms. -- my perception was Ms. Litaker was

7 overwhelmed. Ms. Litaker had some outstanding

8 talents and some outstanding skills. She didn't

9 have the support and the following of her

10 teachers to be able to achieve what she wanted

11 to do. So from the standpoint of Ms. Litaker,

12 she had great ideas. She had some really good

13 plans. We didn't get to the implementation of

14 those plans. We didn't get to the follow

15 through of those plans, and my perception at the

16 time is she didn't have the respect and the

17 trust of her faculty and staff to be able to

18 achieve those plans that she wanted to

19 desperately put in place.

20 Q. And when you talked with Mr. Craig

21 about moving Ms. Litaker, was there any

22 discussion prior to meeting with her on the 15th

23 about where she would be moved to?

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1 A. We did have one discussion about

2 Bumpus, yes.

3 Q. Okay. About -- prior to meeting with

4 Ms. Litaker?

5 A. Yes, sir.

6 Q. Okay.

7 A. As I recall it was before.

8 Q. And the assistant principal position?

9 A. Yes, at Bumpus, because that was an

10 immediate need that we had identified. It was

11 already in discussion.

12 Q. Okay. Any other -- no discussions

13 about any other position?

14 A. Not that I recall.

15 Q. And the meeting with Ms. Litaker on

16 the 15th, who told Ms. Litaker that she was

17 being transferred?

18 A. Mr. Craig.

19 Q. Was she given an option of whether or

20 not to transfer or to stay at Trace Crossings?

21 A. Well, he asked my -- again, my

22 recollection of that meeting is he asked her --

23 after he had shared that information, he asked

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1 her how she felt about it.

2 Q. After he shared what information?

3 A. That we were looking at moving her.

4 Q. Did he tell her why he wanted to move

5 her?

6 A. Yes.

7 Q. And what did he say?

8 A. He said things weren't going as we

9 needed them to go, things didn't seem to be

10 moving forward. The direction of the school was

11 not going in the direction that we thought it

12 needed to be right now, and that we really felt

13 there needed to be a change of leadership.

14 Q. And what was her response to that?

15 A. She, from what I can remember, it was

16 kind of like, okay. I mean, what I remember of

17 that meeting with Ms. Litaker -- in fact, I

18 remember talking with Mr. Craig. I remember a

19 discussion with him after Ms. Litaker left, was

20 almost like a sense of relief after we had that

21 meeting that afternoon.

22 Q. And what was Ms. Litaker told were

23 the plans for her if she left Trace Crossings?

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1 A. She was going to -- we talked about
2 how it would occur. She would take a -- between
3 her exit at Trace Crossings and reporting to
4 central office, she was working on her
5 dissertation. We were going to give her a leave
6 with pay that she agreed to. She said she
7 really needed that time, give it some distance.
8 So she would come back then in January, starting
9 of second semester, and she would be assigned at
10 central office.
11 Q. Did you discuss Bumpus with her
12 during that meeting?
13 A. No.
14 Q. Do you know if Bumpus was ever
15 discussed with Ms. Litaker?
16 A. I don't know that.
17 Q. Was there any indication of when she
18 reported -- during that meeting, was there any
19 discussion of when she reported to central
20 office what she would be doing?
21 A. From what I remember, Mr. Craig
22 talking about he would give her some assignments
23 to do when she came to central office.

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1 Q. Was she ever asked if she wanted to
2 apply for a transfer into any sort of planning
3 director position?
4 A. During that meeting?
5 Q. Yes.
6 A. No.
7 Q. Did you and Mr. Craig ever talk about
8 the duties she was going to be given at central
9 office about -- were you involved in any
10 discussions about making that into a formal
11 position?
12 A. No.
13 Q. During the meeting on the 15th, was
14 it discussed how it would be announced to
15 faculty, staff, parents, the public, about Ms.
16 Litaker leaving Trace Crossings?
17 A. We talked with her about the faculty
18 meeting. We asked her to go back on Friday
19 morning and make -- let the teachers know that
20 there was going to be a faculty meeting right
21 after school that afternoon. I remember Ms.
22 Litaker asking if she had to be there, and we
23 gave that -- that was her choice if she wanted

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1 to be there or if she didn't want to be there,
2 it was up to her. We told her basically what we
3 would tell the teachers in terms of making the
4 move, and with her moving out and exiting and me
5 moving in. And we indicated that we were going
6 to contact the PTO after that meeting with the
7 teachers to let her PTO leadership know of that
8 change.
9 Q. Was it always discussed from the
10 beginning of when you started having discussions
11 about moving Ms. Litaker out that you would be
12 the one to fill her position when she was
13 transferred? That's a bad question. When did
14 you learn that you would be the person that
15 would take over as principal at Trace Crossings?
16 A. That week. I don't know exactly what
17 day that week, but it was that week.
18 Q. Was that your idea?
19 A. For me to move to Trace Crossings?
20 Q. Yes.
21 A. No.
22 Q. Was that Mr. Craig's idea?
23 A. Yes, it was Mr. Craig's idea.

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1 Q. Okay. And did that come about during
2 your discussions with him about moving Ms.
3 Litaker?
4 A. Yes.
5 Q. And what were -- did Mr. Craig share
6 his reasoning for moving you to Trace Crossings?
7 A. Yes, he did.
8 Q. And what was that?
9 A. He felt that because I've had
10 experience. I've had a long tenure as
11 principal, and I've dealt with some very
12 controversial issues, not just with teachers,
13 but with parents. I have a history there, and
14 he felt that this stage we needed to put an
15 experienced principal into Trace Crossings.
16 Q. What kind of controversial issues
17 were going on at Trace Crossings at that time?
18 A. When Ms. Litaker left?
19 Q. Yes.
20 A. Extremely low morale, conflict among
21 teachers, lack of trust teacher to
22 administrator. Teachers felt very much that
23 parents were pretty much in control of things in

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1 the building. Communication issues between
2 administration and faculty. Those are the ones
3 I can remember.
4 Q. And did you agree to move to Trace
5 Crossings?
6 A. I did.
7 Q. Okay. And at the time you moved, did
8 you think it was a temporary assignment?
9 A. I did.
10 Q. And you were still the assistant
11 superintendent?
12 A. Yes.
13 Q. Were you still -- when you started as
14 principal, interim principal, were you still
15 performing some of your assistant superintendent
16 roles?
17 A. Yes.
18 Q. And then at the end of the meeting
19 with Ms. Litaker, how was it determined that --
20 the teachers would be told at a faculty meeting,
21 correct?
22 A. That's right.
23 Q. And then the PTO, how was it

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1 communicated to them that there was going to be
2 a change?
3 A. I sent an e-mail to PTO, the PTO
4 president and asked her to share it with her
5 board.
6 (Plaintiff's Exhibit No. 33 was
7 marked for identification.)
8 Q. Let me show you what I'll mark as
9 Exhibit 33. Exhibit 33 is a couple of e-mails.
10 The first e-mail -- there's a couple of
11 forwards, but the first original message e-mail
12 is a message from you to a group of people. Is
13 that the e-mail that you sent to the PTO board
14 or PTO?
15 A. The one dated?
16 Q. November 16th at 3:41.
17 A. Yes, that is.
18 Q. Okay. And is what's contained in
19 that e-mail what was agreed to at the meeting on
20 the 15th that would be told?
21 A. Basically, yes. And point of
22 clarification, and, again, in this, you remember
23 things when you read this. In that meeting on

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1 the 15th, we agreed that Ms. -- we were trying
2 to give Ms. Litaker a soft landing, because we
3 were moving her out. And as I said here, it is
4 unorthodox to prove a principal in the middle of
5 the year, but giving a principal a -- a
6 principal moving to central office in many
7 respects is deemed a promotion.
8 So having that opportunity to move to
9 central office, when we shared with parents,
10 that gave her a little bit of a softer landing
11 to be able to say there were some opportunities
12 there. She's going to take advantage of those
13 opportunities, and I was going to go to Trace
14 Crossings.
15 Q. Okay. But when Ms. Litaker was moved
16 to central office, at the time she was moved,
17 she was not put into any type of actual position
18 at central office, correct? She was given some
19 duties and assignments, but there was no actual
20 position?
21 A. No, because nothing had been posted.
22 Q. And nothing had been created either,
23 correct?

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1 A. That's correct.
2 Q. Okay. And then the top of the e-mail
3 is from Kristi Tolbert. Was she the PTO
4 president?
5 A. She was.
6 Q. The top e-mail?
7 A. Yes.
8 Q. And she sent an e-mail back to you,
9 it looks like, within an hour, not very happy
10 about being informed about this?
11 A. Uh-huh (positive response).
12 Q. Did you ever have any discussions
13 with her about Ms. Litaker leaving?
14 A. With Kristi Tolbert?
15 Q. Yes.
16 A. The only time I can remember having a
17 conversation about Ms. Litaker's departure with
18 -- that I conversed with Kristi Tolbert -- yes,
19 I did. I had two. I called Kristi. When I got
20 this e-mail, I called her. I felt it was
21 important for me to make that -- because she is
22 now -- I'm going to be working with her as
23 principal of the school on an interim basis and

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1 she's PTO president. So she was very upset.
2 She was very upset. I tried to calm her down,
3 and explain, you know, it was something that we
4 felt we had to do.
5 Kristi's issue with me on the phone
6 was why wasn't the PTO not consulted. And I
7 tried to assure her that that was a decision
8 that was not made by PTO. This was a decision
9 that was made by Mr. Craig. That was one
10 conversation.
11 The other conversation I had with
12 Kristi Tolbert occurred on Saturday morning,
13 November the 17th. I realized I had not gotten
14 any keys from Ms. Litaker, and the next week was
15 Thanksgiving break, and I was going to be out of
16 town that whole week. So I knew Ms. Litaker
17 would be at Trace Crossings on Saturday morning
18 cleaning out her office. So I went to Trace
19 Crossings that morning to make arrangements with
20 Ms. Litaker to get keys for the school so that I
21 could have them when I came back from my family
22 event.
23 And Ms. Tolbert happened to be in the

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1 office with Ms. Litaker when I arrived that
2 morning, and Ms. Tolbert was still very upset.
3 It was not the appropriate place for us to talk
4 about it, but I did entertain -- I listened to
5 her, and, basically -- I didn't say this, but
6 basically it was, I left it with we just have to
7 have a right to disagree.
8 Q. Okay. Was Ms. Litaker popular with
9 the parents at Trace Crossings for the most
10 part?
11 MS. YUENGERT: Object to the form.
12 You can answer.
13 A. I wouldn't have any way to gauge that
14 because I didn't have contact with all the
15 parents. I mean, I don't know.
16 Q. One of the things that she had been
17 asked to do at the school, though, was be more
18 visible and accessible to the parents, correct?
19 A. That's correct.
20 Q. Do you know if she was successful
21 with that?
22 A. I know she was successful with a core
23 group of parents.

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1 Q. Okay. The PTO parents?
2 A. Yes, sir.
3 MR. JENT: I want to jump back a
4 little bit to a couple of e-mails. This is
5 actually a voice preview of a voicemail. So
6 it's not the most accurate thing. It looks like
7 an e-mail. I'm pretty sure we've produced all
8 of these. Have you seen that before? It
9 doesn't have a Bates number because I printed
10 them off, but I thought these were produced with
11 our responses to interrogatories.
12 MS. YUENGERT: I just don't remember
13 seeing anything like this. I don't think I've
14 seen a voice preview produced.
15 MR. JENT: It would have been with
16 the e-mails we produced with the response to
17 request for production.
18 THE WITNESS: I don't remember seeing
19 this.
20 MS. YUENGERT: I've not seen it. If
21 you produced it, I don't think that we've seen
22 it.
23 MR. JENT: I know there was a lot of

Page 108

1 paper.
2 MS. YUENGERT: What have you marked
3 it as, 34?
4 MR. JENT: Yeah.
5 (Plaintiff's Exhibit No. 34 was
6 marked for identification.)
7 Q. I'm just going to ask, do you recall
8 anything about -- it looks like this is from
9 October 9th, 2012. Do you recall any issue
10 raised by parents at a board meeting in October
11 of 2012 relating to Trace Crossings?
12 A. Based on this, I have no clue what
13 that's about. I really don't. I have no clue
14 what that's about.
15 Q. So you don't recall that --
16 A. But you can --
17 Q. -- based on this?
18 A. -- look back on the board notes. No,
19 I have no idea.
20 Q. Do you recall any concerns raised by
21 parents at board meetings in that fall period of
22 2012 about Trace Crossings?
23 A. At this time, I don't remember that,

Page 109

1 no.
2 Q. And then on November 16th, I believe,
3 you sent an e-mail out to certain board
4 employees, correct, about Ms. Litaker's
5 transfer? It's Exhibit 6.
6 A. Yes, yes.
7 Q. And who are the -- I don't want to go
8 through each person there, but is that a drop
9 down list?
10 A. That is, yes.
11 Q. And who would that be considered?
12 A. This is central office. It's central
13 office and all of our administrators.
14 Q. Okay. And this e-mail was in
15 agreement with what had been discussed at the
16 November 15th meeting about what would be sent
17 out, too, correct?
18 A. We didn't talk in that meeting about
19 sending out an e-mail specifically to a faculty
20 or a staff or anything like that. We did talk
21 about notifying the parent, the PTO group, but
22 this is basically what we agreed on in terms of
23 how we were going to share the change. Now, it

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1 was not -- we didn't talk about are we going to
2 do that in a meeting or are we going to do that
3 by e-mail. I chose to send it out by e-mail,
4 but we had talked in the meeting about what we
5 were going to say as we talked to the general
6 public about the change for Ms. Litaker.
7 Q. And then at some point did you
8 discuss with Mr. Craig sending out this e-mail,
9 Exhibit 6?
10 A. No.
11 Q. And then the next Exhibit 7 is from
12 that Monday and that's an e-mail you sent to a
13 certain group of people. Was that a
14 distribution list also?
15 A. No.
16 Q. Was that the other elementary school
17 principals?
18 A. No.
19 Q. Okay.
20 A. Not all of them.
21 Q. Why were these people chosen for this
22 e-mail?
23 A. They were chosen, most of them are

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1 elementary principals with the exception of
2 Louise White. Louise White was on the list
3 because she was my administrative assistant. I
4 felt she needed to have that information.
5 Q. And why did you send this e-mail to
6 this group of people?
7 A. Because I was getting some questions
8 from some of the elementary principals about
9 what's going on. I had that kind of a
10 relationship with them because I worked very
11 closely with them. I felt the elementary
12 principals, there were two reasons why. One is
13 I felt they needed a little bit more information
14 than the general information that went out.
15 Secondly, I really was trying,
16 although my knowledge now is that she doesn't
17 see it that way, but I really was trying to give
18 Ms. Litaker a soft fall. I was trying to give
19 the opportunity for them to see that it was not
20 her performance that caused us to move her from
21 Trace Crossings. There were other issues going
22 on, and there was no way we could -- she could
23 -- we felt she could not change those issues at

Page 112

1 that time.
2 Q. Were these issues starting with the,
3 "Robin did exactly what we asked her to do,"
4 that part of the e-mail on down through the
5 ruffled feathers and those issues, were they
6 discussed with Ms. Litaker during the November
7 15th meeting with Mr. Craig?
8 A. Wait. What are you asking me to look
9 at here?
10 Q. Yeah. The part of the e-mail that
11 says, "Robin did exactly what we asked her to
12 do."
13 A. Okay. I have the wrong e-mail.
14 Q. I'm sorry. Exhibit 7.
15 A. This one. Okay. Right. Okay.
16 Q. Those issues, those things, the
17 holding teacher and staff accountable,
18 unraveling layers and layers of issues, feelings
19 hurt, people started arguing, the back stabbing,
20 were those things discussed with Ms. Litaker in
21 the November 15th meeting?
22 A. Directly, no. Now, in that November
23 15th meeting, low morale and climate and culture

Page 113

1 was discussed.

2 Q. Okay. Was it discussed during that

3 meeting on November 15th that that would not be

4 what was told to anyone outside of that group of

5 three people as the reasons for her leaving that

6 position?

7 A. Again, ask me the question.

8 Q. Yeah. Was it discussed during the

9 meeting on the 15th that you and Mr. Craig were

10 not going to share with any other employees or

11 the public about the reasons being the extremely

12 low morale, the poor climate, or the negative

13 culture?

14 A. No, because I put it in this e-mail.

15 I'm going to clarify something else. These are

16 her colleagues. These are the people who have

17 worked most closely with Ms. Litaker. They know

18 what kind of person Ms. Litaker is. So they --

19 I felt at the time they needed to have some

20 information because these are people who were in

21 the building. They are sitting in that

22 principal's chair. They needed to know why we

23 would change a principal in November to a

Page 114

1 different position. In an elementary school,

2 it's highly unorthodox.

3 Q. And you also told them in the e-mail

4 about teachers complaining and threatening to

5 leave, correct?

6 A. Yes.

7 Q. Okay. Did you run this e-mail by Mr.

8 Craig before you sent it?

9 A. No.

10 Q. Did you run it by Ms. Veal before you

11 sent it?

12 A. No.

13 Q. Did you run either e-mail by Ms. Veal

14 before you sent it?

15 A. No.

16 Q. Did you have any discussions with Ms.

17 Veal during this time period of that week of

18 November 12th, 13th, the week that Ms. Litaker

19 was notified of her termination about how to

20 handle -- not of her termination -- of her

21 transfer, of how to handle the transfer with

22 human resources?

23 A. Yes. Ms. Veal, we discussed that

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1 with Ms. Veal, yes.

2 Q. And what did you discuss with Ms.

3 Veal?

4 A. We looked at the contract and

5 reviewed the contract in terms of what we could

6 do legally.

7 Q. Okay. And what did you feel you

8 could do legally in terms of the contract?

9 A. We felt we could move her if she

10 agreed.

11 Q. Did you feel you had to move her to

12 an actual position?

13 A. Did we feel we had to move her to a

14 position? We had to move her. If I was going

15 to move over to Trace Crossings, you can't have

16 two principals at a school.

17 Q. And then what did you feel had to be

18 done with her?

19 A. She was going to be given another

20 administrative responsibility in our district.

21 Q. And what was that administrative

22 responsibility?

23 A. We had not decided.

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1 Q. Do you know if it was ever decided

2 what administrative responsibilities she would

3 be moved to?

4 A. Well, I think we've heard that

5 testimony from Mr. Craig and Ms. Veal that Mr.

6 Craig gave her other responsibilities,

7 administrative responsibilities.

8 Q. He gave her the responsibilities --

9 okay. I think you've already testified to that.

10 Were you ever involved with any discussions

11 about a permanent placement for Ms. Litaker

12 after Trace Crossings?

13 A. No. I guess was I ever involved in a

14 discussion? With whom?

15 Q. With Mr. Craig.

16 A. No.

17 Q. With anyone?

18 A. Yes.

19 Q. Who?

20 A. I think it was with Ms. Litaker.

21 Q. Tell me about that.

22 A. When we were meeting and there was

23 general consensus in the community among parents

Page 117

1 that Ms. Litaker was coming back to Trace
2 Crossings, the year after I came in November.
3 And it was pretty rampant in the community. I
4 was hearing it from a lot of parents about Ms.
5 Litaker would be back the next year. I asked
6 Ms. Litaker if she was discussing that with
7 parents. This was in the meeting when Ms. Veal
8 and Ms. Litaker.
9 Q. January 28th?
10 A. Yes. And I asked her if she had
11 heard that or if she was talking to parents
12 about that or did she expect -- I mean, I don't
13 think I asked the question if she expected to
14 come back to Trace Crossings, but that rumor was
15 going around, and I asked Ms. Litaker about it
16 at that stage. That was the only discussion I
17 can ever remember having any kind of discussion
18 about where Ms. Litaker would go.
19 Q. Okay. And did Ms. Litaker -- did
20 anyone ever tell you that Ms. Litaker had
21 expressed to the parents that she would be back
22 at Trace Crossings?
23 A. I had that -- did anyone -- say your

Page 118

1 question again for me, please.
2 Q. Yes. Did anyone ever tell you that
3 it was Ms. Litaker who had told parents that she
4 was coming back?
5 A. No, no.
6 Q. Did Ms. Litaker ever express to you a
7 dissatisfaction with what she was doing at the
8 central office?
9 A. Not that I recall. Are you talking
10 about the tasks that she was assigned?
11 Q. Not so much the tasks she was
12 assigned but the fact that it was not a
13 permanent assignment?
14 A. No, no.
15 Q. Okay. Did she complain about the
16 tasks?
17 A. There was one conversation I can
18 remember that we had. She was in the safety
19 where she was doing the safety audit, and she
20 felt -- that was a passion, and everybody knew
21 that was something -- safety issues were
22 something very near and dear to Ms. Litaker's
23 heart. She's got a reputation in our district

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1 on that. She's good at it. But when I talked
2 to her, there was some conflict about her coming
3 back to Trace Crossings, and she and I had a
4 telephone conversation. There were some e-mails
5 I think about it, but then I picked up the phone
6 and had some conversations with her on the
7 phone, and she had voiced concern about what it
8 was she was asked to do in terms of the
9 meaningfulness of that.
10 Q. Okay. And how did you respond to
11 that?
12 A. It was something that needed to be
13 done. I mean, it was -- it's obvious. I mean,
14 our district is always -- every year there's a
15 need for a safety audit. We hadn't done it for
16 quite some time and there were major issues. I
17 can go -- even just at our school right now or
18 when she was doing that audit, there were issues
19 that she had identified that I repeated for her,
20 because that was very necessary. All schools
21 needed to do that.
22 Q. Do you know why it was that if that
23 was something that needed to be done on a yearly

Page 120

1 basis, why wasn't a position created, such as
2 safety director, or someone who would be in
3 charge of doing those safety audits on a yearly
4 basis?
5 A. That wouldn't be my decision.
6 Q. Mr. Craig?
7 A. That would be Mr. Craig's decision.
8 There's also -- you need to back up. I need to
9 back up. I'm not saying safety audits weren't
10 done. They may not have been done in the formal
11 sense that Ms. Litaker was doing them right now,
12 but there were people in our district whose
13 responsibility it was to do safety audits. She
14 took that responsibility and ran with it because
15 many times that could get pushed back. But our
16 whole operations department does safety audits
17 all the time. They are required by law to do
18 safety audits, playground equipment, that type
19 of thing, fire extinguishers and things like
20 that.
21 Q. Was that what Ms. Litaker was doing?
22 A. No, she was doing more the building
23 from the standpoint of security within a

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1 building. She was doing more -- from what I
2 understood, she was doing more of that security
3 and what types of things need to be tightened up
4 in terms of security.
5 And I'll give you an example. At our
6 school the lobby was totally open. The
7 receptionist who would buzz people in couldn't
8 even see the door whenever she buzzed. Anybody
9 could come in. She was buzzing people into the
10 door. We had locks on the door. People had to
11 be buzzed in, but the receptionist who would
12 buzz people in didn't see the door because of
13 the structure of that school.
14 We had to put in some major -- we had
15 to do some major renovation to make that a
16 secure entryway into that school. And that was
17 one of the things, Ms. Litaker was looking at
18 all the schools in terms of making
19 recommendations for that.
20 Q. And then you sent out an e-mail --
21 you met with the Trace Crossings faculty and
22 staff on that Friday, correct?
23 A. That's right.

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1 Q. And how did that meeting go?
2 A. What do you mean?
3 Q. Was it a positive meeting? Were
4 people upset? Were they happy? I mean, how did
5 that -- were there -- it was obviously
6 communicated that Ms. Litaker would be
7 transferred, and you would be taking over. Were
8 there any questions or any other information
9 given during that meeting?
10 A. No.
11 (Plaintiff's Exhibit No. 35 was
12 marked for identification.)
13 Q. Okay. And then on the next Monday
14 you sent an e-mail out to the faculty and staff
15 at Trace Crossings, correct?
16 A. I don't recall. I would have to see
17 the -- because I know I was on vacation that
18 Monday. So I'm not sure what -- I don't have
19 those notes in front of me. I would have to
20 look at them.
21 Q. Do you recall --
22 A. This is my e-mail, uh-huh (positive
23 response).

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1 Q. Do you recall meeting with the PTO
2 board on that Sunday afternoon?
3 A. I do.
4 Q. Okay. And then there was a parents'
5 meeting scheduled for the Tuesday, the next
6 Tuesday?
7 A. The Tuesday after Thanksgiving.
8 Q. After Thanksgiving. And then you
9 went around to talk with the kids at some point?
10 A. Absolutely.
11 Q. And told them what was going on or
12 just --
13 A. Introducing myself.
14 Q. You introduced yourself, yes. And I
15 think you mentioned at some point Ms. Litaker
16 was at the school on a Saturday to clean out her
17 office. You said you had gone to get the keys
18 from her?
19 A. Yes, I did.
20 Q. Was there anybody else there during
21 that time?
22 A. Yes.
23 Q. Ms. Kristi --

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1 A. Tolbert.
2 Q. -- Tolbert was there. Okay. Did you
3 have any discussions with Ms. Litaker on that
4 Saturday about the changes?
5 A. I didn't do much talking on that
6 Saturday. As I said before, Ms. Tolbert was
7 very upset. She was still upset, and as I said,
8 we kind of left it, I'm not going to engage in a
9 discussion with Ms. Tolbert at that time. It
10 wasn't appropriate. I listened to her concerns,
11 and we just had to, again, agree to disagree
12 from my recollection.
13 Q. And at some point in time were you
14 contacted by John Anderson from the Birmingham
15 News or al.com, wherever he --
16 A. I was regularly contacted by John
17 Anderson at Birmingham News.
18 Q. About Ms. Litaker or about the
19 changes at Trace Crossings with Ms. Litaker
20 leaving?
21 A. That was not -- no.
22 Q. Did he ever attempt to contact you
23 about Ms. Litaker being transferred and you

Page 125

1 taking over at Trace Crossings?

2 A. I'm sure he did. I don't remember,

3 but I am sure he did.

4 Q. Look at Exhibit 8. And if you look

5 at the second page, it's an e-mail from John

6 Anderson about the changes, administrative

7 changes at Trace Crossings and then Ms. Litaker

8 asks for guidance on what to do. And then you

9 responded that you were sent the same message

10 and you were going to call them in the morning.

11 "I would not respond if I were you." Do you

12 recall that at all?

13 A. Yes. But he didn't -- I was

14 responding to your question based on did he ask

15 to talk about Robin Litaker. He asked to talk

16 to me about this e-mail that went out. So yes,

17 he did contact me to talk to me about the

18 e-mail.

19 Q. Which e-mail?

20 A. This e-mail that he --

21 Q. 6 or 7?

22 A. -- posted, whichever one he posted in

23 the News. The 7th, the 7 exhibit.

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1 Q. Do you know where he got that e-mail?

2 A. I have no clue.

3 Q. Did you ever ask any of the people

4 you sent the e-mail to where he got that e-mail?

5 A. I made a general -- we talked about

6 it in a principal's meeting, and I shared with

7 the principals that I was very concerned because

8 it was a very select group of people to whom

9 this was sent, and I did not ask them, no,

10 because -- I'm being very honest with you -- I

11 didn't want to know.

12 Q. Did you -- so you never to this day

13 haven't found -- you don't know how he got it?

14 A. I do not know who sent it to John

15 Anderson.

16 Q. Did you ever have a verbal

17 conversation with John Anderson about the

18 changes at Trace Crossings? Did you ever talk

19 to him about it?

20 A. Not that I can remember.

21 Q. Did you ever send him an e-mail about

22 any of it, clarification of anything, anything

23 like that?

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1 A. Not that I recall.

2 Q. Do you know if anybody at Hoover

3 School System did?

4 A. I would have no way of knowing that.

5 Q. Did you talk to Mr. Craig about John

6 Anderson's reporting of that e-mail?

7 A. Yes.

8 Q. Okay. Tell me about that.

9 A. I was very upset, because I didn't

10 know how John Anderson could have gotten ahold

11 of the article.

12 MS. YUENGERT: The article? The

13 e-mail?

14 A. I'm sorry, the e-mail, and posted it

15 -- that he wrote an article about the e-mail. I

16 had no clue, and I was on my way to North

17 Carolina when I heard about it. Some principal

18 colleagues called me and then sent me copies and

19 told me to go on to al.com. And, yes, I called

20 Mr. Craig to talk about it.

21 Q. Did you ever talk with Ms. Litaker

22 about that?

23 A. Not to my knowledge.

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1 Q. And then after you took over at Trace

2 Crossings, did you -- I guess you had some

3 communications with Ms. Litaker about the

4 transition. You were trying to find some

5 things, look for things, correct?

6 A. That's right.

7 Q. Okay. Did you find -- were those

8 communications normal in your mind?

9 A. They started out very normal.

10 Q. Okay. Did that change?

11 A. Yes.

12 Q. And when did that change?

13 A. As time progressed.

14 Q. Okay. And how did they change?

15 A. I felt that -- first of all, when I

16 got to Trace Crossings there was nothing, and

17 when I say nothing, there wasn't anything left

18 in the office. I had to even bring my desk

19 supplies from central office because staplers

20 were gone, pencils, note pads, records. There

21 were no files. There were no files left in the

22 office. There were about three notebooks in the

23 office that had -- one was a SACS review, a

<p style="text-align: right;">Page 129</p> <p>1 Southern Association -- SACS. I don't remember 2 what it is. Southern Association for 3 Accreditation. There was the latest SACS 4 review. I don't remember what the other two 5 notebooks were. I think one was something about 6 placement of students, some parent forms for 7 placement of students. I can't recall what the 8 other one was. 9 But I had a desperate need to 10 communicate with Ms. Litaker, particularly 11 issues like discipline and students -- 12 background information, because immediately when 13 I went to Trace Crossings, there was a special 14 needs student that was involved in some most 15 inappropriate activity, and I felt my hands were 16 tied because I didn't have the history in terms 17 of discipline. And his special Ed case manager 18 was sharing that there were discipline 19 situations with this child. I had no record of 20 it. 21 So I called Ms. Litaker, e-mailed Ms. 22 Litaker asking her for -- the two things I 23 remember asking repeatedly, test records,</p>	<p style="text-align: right;">Page 131</p> <p>1 have to register discipline complaints in that 2 administrative software program. At the 3 elementary the principals had the choice. They 4 could register discipline in that administrative 5 software program or they could keep records of 6 their own. They were required to keep records. 7 Ms. Litaker chose to keep it on an Excel file. 8 She did not want to enter it into the 9 administrative software program. That was her 10 choice, and I honored those choices by 11 individual principals. Some kept it one place 12 or the other. So when I find out she's kept it 13 on an Excel file, I needed that Excel file. She 14 never sent me the Excel file. 15 Q. Was her computer still there or did 16 she have a lap top? 17 A. Yes. It was wiped clean. 18 Q. Did you find the ARMT files? 19 A. I got the ARMT files off the state 20 department. I got all that ARMT information off 21 of the website. I did find a copy that Ms. 22 Stone had kept. It was not the original, but it 23 was a copy of a -- a teacher had done some</p>
<p style="text-align: right;">Page 130</p> <p>1 because I did not have any of the ARMT data from 2 the year before unless I went on the website to 3 get it, the public information, and the second 4 thing was the discipline files for children. 5 Q. Did you ever find those files? 6 A. Discipline files, no. And she 7 finally told me there was no discipline. At one 8 point, she said there was no discipline. She 9 said that there was -- she kept an Excel file. 10 At that point, principals were not required, and 11 we -- again, in my role as assistant 12 superintendent, I allowed the principals to make 13 that decision themselves at the building. 14 They could either put their 15 discipline -- elementary children, you have to 16 really stop to think about what you label as 17 discipline because sometimes teachers bring kids 18 to your office, the little ones, just to kind of 19 get their attention. You wouldn't call that 20 discipline so to speak. So it's very different 21 than in the middle or high school. 22 But our administrative software has a 23 discipline component, and secondary level you</p>	<p style="text-align: right;">Page 132</p> <p>1 analysis of scores of students and notes of 2 students and one of the classroom teachers, Ms. 3 Litaker had asked the teacher to bring in, or 4 she came in during the summer and this teacher 5 categorized all the scores by teacher, and those 6 were copied. Ms. Stone kept a copy of those. 7 Ms. Smith, our counselor, also had some copies 8 of some of those files. 9 Q. Okay. 10 A. The originals were not found. I 11 asked Ms. Litaker, because my first impression 12 was Ms. Litaker kept those files. She was 13 working on her dissertation. I thought maybe 14 she needed the files for her dissertation. I 15 offered to copy them. She first said they were 16 probably in a box because she hadn't unpacked 17 all her boxes. But when I continued to keep 18 asking her for them, she said she didn't have 19 them. 20 Q. And then you eventually met with her 21 on January 28th? 22 A. That's when it got -- yes, because I 23 was so frustrated because there were documents</p>

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1 that I had to have at the school level and I
2 couldn't put my hands on them. And again, I'll
3 go back to the discipline files. That was
4 critical for special needs children in terms of
5 what we could and couldn't do in terms of a
6 consequence for discipline. I had no
7 information.

8 In an e-mail at one point, we finally
9 just agreed to, I would keep records from that
10 point forward. At the end of the year when I
11 had to submit any data dealing with discipline,
12 which is part of our state reporting, she would
13 have to report from August to November, and I
14 would report from December through the end of
15 the year, because I had no information from her.

16 MR. JENT: Let's take a couple of
17 minutes.

18 (Whereupon, a brief recess was
19 taken.)

20 Q. Before we go to the January 28th
21 meeting, just a few more things about the files
22 and everything. On that Saturday after Ms.
23 Litaker was notified that she was being moved

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1 and you went in to get the keys and everything,
2 did Ms. Litaker have certain files and things
3 that she had put together to give to you to help
4 you with the transition at that time?

5 A. On that Saturday.

6 Q. Yes.

7 A. No.

8 Q. Did Ms. Litaker ever tell you that
9 there was sort of an administrative file that
10 you needed a password to on the computer that
11 that's where the disciplinary actions were kept?

12 A. No, no.

13 Q. Did she ever tell you that Ms. Stone,
14 or is it Ms. Smith that was the counselor?

15 A. Yes.

16 Q. That they had copies of the test
17 scores that you were looking for?

18 A. Yes.

19 Q. Okay.

20 A. That's where I got them.

21 Q. You got them from them? And then did
22 you ever -- did Ms. Smith or Ms. Stone have
23 access or have the disciplinary files?

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1 A. Ask me again. Sorry.

2 Q. Did Ms. Stone or Ms. Smith have the
3 disciplinary files?

4 A. No.

5 Q. Did you ask them for them?

6 A. Yes.

7 Q. And at the time that Ms. Litaker --
8 y'all met with her and told her that she was
9 being transferred, were you aware that she had
10 -- during that time period, sometime in that
11 October/November time period, learned that her
12 father had cancer?

13 A. No.

14 Q. You weren't aware of that?

15 A. No.

16 Q. And then on January 28th you asked
17 Ms. Litaker to come to a meeting?

18 A. Yes.

19 Q. At the central -- she was already at
20 the central office?

21 A. Yes.

22 Q. Was the meeting at the central
23 office?

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1 A. Yes.

2 Q. Where was it held in the central
3 office?

4 A. Ms. Veal's office.

5 Q. If you'll look at Exhibit 13, prior
6 to the move or even after the move, you and Ms.
7 Litaker had a pretty good working relationship,
8 didn't you?

9 A. My perception of that was yes.

10 Q. And she seemed to appreciate your
11 involvement, your support with her at Trace
12 Crossings up to that point, correct?

13 A. I think it was reciprocal
14 appreciation and respect, yes.

15 Q. Now, did you ever request prior to
16 January 28th that Ms. Litaker come back to Trace
17 Crossings, maybe after hours. To help you find
18 some of the things you were looking for?

19 A. I don't recall that, no.

20 Q. Okay. Had that been discussed with
21 Ms. Litaker when she was told of the transfer,
22 that she might be needed to come back and help
23 locate things or help with the transition at

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1 Trace Crossings?

2 A. I can't remember when we discussed

3 it, but I do know I talked with Ms. Litaker

4 about needing her help and her support when I

5 transitioned to Trace Crossings.

6 Q. Did she ever indicate to you at that

7 point that she would not help you?

8 A. No.

9 Q. In this meeting on the 28th, have you

10 had a chance to review these notes?

11 A. Yes, I have.

12 Q. And from what you remember, do they

13 accurately reflect what was discussed at the

14 meeting?

15 A. Basically, yes.

16 Q. Is there anything you recall being

17 discussed that you don't remember seeing in

18 these notes?

19 A. Not to my memory.

20 Q. You can take a look. Had you talked

21 with Mr. Craig about any of the concerns about

22 the location of the student data?

23 A. Probably not.

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1 Q. After this meeting, did you discuss

2 this meeting with Mr. Craig, this January 28th

3 meeting?

4 A. I don't remember.

5 Q. The second paragraph of the notes

6 refers to some missing data, files and data that

7 were in a white notebook. What was that

8 referring to? Do you recall what kind of --

9 what general information that was?

10 A. Where do you see that?

11 Q. The first sentence there says: CB

12 expressed concern about missing files and

13 student data that she was told previously --

14 A. I see it. That Robin had responded

15 the data that I was looking for, which was the

16 ARMT data and the SMI data, she said was in a

17 white notebook.

18 Q. What's SMI?

19 A. Scholastic --

20 Q. Some more testing?

21 A. Inventory, it's an assessment. It's

22 a math inventory. That's it, Scholastic Math

23 Inventory. It's getting late.

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1 Q. Did you ever find that data? You

2 told me about the ARMT. Did you ever find the

3 SMI data?

4 A. I found a copy of the SMI data.

5 Q. Okay. And then at the end of that

6 paragraph, it says: Ms. Litaker says it's

7 across the hallway. Did you ever find that?

8 Did you ever look across the hallway in whatever

9 she was referring to there, or do you know what

10 she's referring to?

11 A. Yes. Again, she's replying that the

12 ARMT data is across the hallway.

13 Q. At the central office?

14 A. No, at Trace Crossings.

15 Q. At Trace Crossings. Okay. The next

16 paragraph says: CB inquired about PST notes.

17 What is that?

18 A. Problem solving team.

19 Q. Was that different than the team, the

20 support team?

21 A. Yes. This was a school based team.

22 Q. Okay. Is there one at every school?

23 A. Yes.

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1 Q. And the next page, something about

2 poetry examples. Was that something submitted

3 by the students?

4 A. Where are you reading?

5 Q. On the first paragraph.

6 A. First paragraph? I know what that

7 was. That was, every year schools are asked to

8 participate in a district poetry contest and I

9 was concerned about the quality of the exemplars

10 that came out of Trace Crossings.

11 Q. And then the next concern issue

12 that's addressed is the core group of parents.

13 You were still having issues with parents at

14 that point?

15 A. Is your question was I having issues

16 with parents?

17 Q. Well, not you in particular, but

18 issues with parents about --

19 A. No. As I stated in this, and I kind

20 of referred to this awhile ago, there was this

21 rumor going around that Robin was coming back to

22 Trace Crossings. And I asked her for

23 clarification there, if she knew about that, if

<p style="text-align: right;">Page 141</p> <p>1 she had had contact with parents.</p> <p>2 Q. So we've already discussed that part</p> <p>3 of the meeting. In the next paragraph it talks</p> <p>4 about RL stated she went through hell when many</p> <p>5 thought Debra Smith would be there. Do you</p> <p>6 recall her telling you that?</p> <p>7 A. Yes, she's talked about that.</p> <p>8 Q. Is that the first time that you had</p> <p>9 heard that from her or had she expressed that to</p> <p>10 you previously?</p> <p>11 A. She had expressed that before.</p> <p>12 Q. Okay. Who is Debbie Drake?</p> <p>13 A. She is the bookkeeper at Trace</p> <p>14 Crossings.</p> <p>15 Q. Now, were you evaluating Ms.</p> <p>16 Litaker's performance? In your role as</p> <p>17 assistant superintendent, did you evaluate her</p> <p>18 performance?</p> <p>19 A. Yes.</p> <p>20 Q. And were you evaluating it in the</p> <p>21 2012 year?</p> <p>22 A. At the beginning of the year, yes.</p> <p>23 Q. Did you continue to evaluate it once</p>	<p style="text-align: right;">Page 143</p> <p>1 MS. YUENGERT: Object to the form.</p> <p>2 You can answer.</p> <p>3 A. Ask the question again.</p> <p>4 Q. Was there a deadline -- under Lead</p> <p>5 Alabama were there deadlines in place for the</p> <p>6 evaluations for all principals?</p> <p>7 A. Lead Alabama was not an evaluative</p> <p>8 system. Lead Alabama is more of an ongoing goal</p> <p>9 setting and setting up a personal -- a</p> <p>10 professional development plan. It's more of a</p> <p>11 formative assessment on an ongoing basis. It's</p> <p>12 not evaluative in nature.</p> <p>13 Q. Was there still an evaluative</p> <p>14 assessment being performed on principals at that</p> <p>15 time?</p> <p>16 A. We, as a district, adopted a system</p> <p>17 for -- yes, that put in place evaluation for</p> <p>18 principals.</p> <p>19 Q. And if you look back at Exhibit 4,</p> <p>20 the contract, it required evaluations on a</p> <p>21 yearly basis, correct?</p> <p>22 A. Okay.</p> <p>23 Q. Page 4.</p>
<p style="text-align: right;">Page 142</p> <p>1 she was moved to central office?</p> <p>2 A. No.</p> <p>3 Q. Did anyone evaluate her once she was</p> <p>4 moved to central office?</p> <p>5 MS. YUENGERT: Object to the form.</p> <p>6 You can answer.</p> <p>7 A. I'm not aware. I wouldn't have any</p> <p>8 information to answer that question.</p> <p>9 Q. And at that time in the 2012/2013</p> <p>10 year, how were principal evaluations done? I</p> <p>11 mean, what was the procedure that you went</p> <p>12 through?</p> <p>13 A. We were following the state model</p> <p>14 which is called, I think that was the year we</p> <p>15 made a transition to Lead Alabama, and that was</p> <p>16 -- it was either the first or the second year we</p> <p>17 were using this new state, more like a portfolio</p> <p>18 assessment with the state.</p> <p>19 Q. Okay. And was that different than</p> <p>20 having done previously before the Alabama --</p> <p>21 A. Yes.</p> <p>22 Q. When were the -- was there a deadline</p> <p>23 for completing evaluations on principals?</p>	<p style="text-align: right;">Page 144</p> <p>1 A. Evaluated annually according to the</p> <p>2 process defined by the State Board of Education,</p> <p>3 yes.</p> <p>4 Q. And was Ms. Litaker evaluated</p> <p>5 annually according to the process defined by the</p> <p>6 State Board of Education?</p> <p>7 A. Yes.</p> <p>8 Q. And that was either the Lead Alabama</p> <p>9 or whatever was in place before Lead Alabama or</p> <p>10 was there something else I'm missing?</p> <p>11 A. Again, ask me the question.</p> <p>12 Q. Okay. In the 2012/2013 year, was</p> <p>13 there a written evaluation performed on Ms.</p> <p>14 Litaker as a principal?</p> <p>15 A. We followed the Lead Alabama, which</p> <p>16 was the required State Department of Education</p> <p>17 system.</p> <p>18 Q. And was there a written documentation</p> <p>19 of the Lead Alabama?</p> <p>20 A. She has that in her portfolio, yes.</p> <p>21 Q. Okay. Tell me what you mean by her</p> <p>22 portfolio.</p> <p>23 A. She has to set up -- there are three</p>

<p style="text-align: right;">Page 145</p> <p>1 parts to Lead Alabama, a self-assessment, 2 professional learning plan, and then artifacts. 3 You have to enter summary data, artifacts to 4 show that you are completing your professional 5 learning plan. So those three components were 6 completed, but she's responsible for doing that. 7 It's reviewed by others, but that's the 8 responsibility of each individual person to set 9 up your own. You do your own self-assessment. 10 You do your own professional learning plan, and 11 you enter your own artifacts. 12 Q. Did you ever review those with her 13 for 2012/2013 year? 14 A. Yes. 15 Q. When was that done? 16 A. I signed off or not -- yes, I did -- 17 signed off on her self-assessment and her PLP, 18 if my memory serves me correctly. 19 Q. Okay. Back to the January 28th note, 20 Ms. Litaker never told you in this meeting that 21 she had been talking about her removal with 22 parents, correct? 23 MS. YUENGERT: Could you restate that</p>	<p style="text-align: right;">Page 147</p> <p>1 know what that was. Okay. 2 MS. YUENGERT: What was the question 3 again? 4 Q. What were you talking -- this 5 template that was created, what was that? 6 A. That was a form for -- that Ms. 7 Litaker had shared with parents if they wanted 8 input on student placement for that upcoming 9 school year. 10 Q. Okay. And then there's Concern over 11 Entitlement. Who had that concern? 12 A. There was concern from teachers that 13 parents felt a sense of entitlement, 14 particularly PTO board. 15 Q. Okay. And then the next part talks 16 about placement cards. Originally placement 17 cards had department information demographic 18 that could be considered profiling and she did 19 away with that. Were you aware of those 20 placement cards? 21 A. I never saw them. She was sharing 22 that. I didn't see those. I didn't see any of 23 those placement things. They were not there.</p>
<p style="text-align: right;">Page 146</p> <p>1 without all the negatives? 2 A. Yeah, ask the question again. 3 Q. During the meeting did Ms. Litaker 4 ever tell you that she had been talking with 5 parents about her removal? 6 A. Did she tell me that she was talking 7 to parents? 8 Q. Yes. 9 A. No. 10 Q. In the next -- in the last paragraph 11 on that second page that goes over on to the 12 third page, it talks about parent conferences 13 revolving around choice of teacher. Do you see 14 that? 15 A. Right. 16 Q. And demographic rezoning and you 17 shared a template. Did you create a template 18 for the parent -- was it parent/teacher 19 conferences, or who was having these 20 conferences? 21 A. I don't remember. I don't remember 22 what that -- I don't remember that part. Let me 23 read the rest. Hold on just a second. Oh, I</p>	<p style="text-align: right;">Page 148</p> <p>1 Q. Then it says: RL said her biggest 2 supporters were apartment kid parents, but you 3 don't hear from them because they were working 4 two jobs. RL was floored that parents were 5 upset she was leaving. Do you remember that 6 part of the discussion? 7 A. I remember her telling me that she 8 had a lot of parent support. 9 Q. Okay. Do you remember her being 10 floored that parents were upset she was leaving? 11 A. Do I remember if she said that? 12 Q. Yes. 13 A. I couldn't recall her exact words, 14 no. 15 Q. Did you say that parents were mad 16 because they weren't consulted and that was 17 impacting the culture? 18 A. Yes, I did. I talked to her about 19 that. I don't know what those words were, but 20 yes, I did share that. 21 Q. Do you recall her saying that she 22 would never undermine you? 23 A. I do remember her saying that.</p>

<p style="text-align: right;">Page 149</p> <p>1 Q. And then you said you desired to 2 spend all energy on students and teachers? 3 A. Yes. 4 Q. Okay. And then she said she's not 5 talking. Do you recall that? 6 A. I recall her saying she wasn't 7 talking to parents. 8 Q. Okay. And then the next paragraph 9 talks, and we've talked about this so I'm not 10 going to go into it too much, but there was much 11 to overcome with Dot and Debra. Do you recall 12 her talking about that in this meeting? 13 A. I don't remember her talking about 14 Dot and Debra in this meeting, no. 15 Q. Do you recall talking about the team 16 meetings? 17 A. We talked about teaming in the 18 school, and she -- Robin veered off into team 19 meeting. I remember the conversation dealing 20 with -- when I was trying to talk about teaming 21 as a whole, she veered off into team meetings 22 per se. But I don't recall the specifics of 23 that conversation.</p>	<p style="text-align: right;">Page 151</p> <p>1 information? Was there a wrap-up or anything 2 like that at the end of the meeting? 3 A. That she's asking me for? 4 Q. Or did you give her one? 5 A. Ask your question again. 6 Q. Right. I mean, did the meeting end 7 with an agreement that she would look for things 8 or was there anything that you remember about 9 the end of the meeting as far as was there going 10 to be a next step into how you would get the 11 information you needed and how you would move 12 forward at Trace Crossings? 13 A. I entered the meeting in a problem- 14 solving mode. I really needed Robin's help. We 15 had been exchanging e-mails, and I wasn't 16 getting the information I needed. So that's why 17 I felt we needed to have a meeting to look at 18 that. And yes, I felt that she was trying to 19 provide some support, but at that point she said 20 she didn't have the documents. So I guess -- 21 and, you know, from what I remember, leaving 22 that meeting was that in her mind she did not 23 have the documents. I knew I didn't have what I</p>
<p style="text-align: right;">Page 150</p> <p>1 Q. And then it says: RL stated there 2 are three bullies that need to build respect. 3 Did she state who those three bullies were? 4 A. I don't remember that at all, huh-uh 5 (negative response). 6 Q. And then student discipline, did you 7 ever find the student discipline file? 8 A. No. 9 Q. You've told me no? 10 A. No. 11 Q. You kept separate -- you reported 12 separately? 13 A. Yes. 14 Q. How do you remember the meeting 15 ending? 16 A. It ended. 17 Q. Did you have any follow-up with her 18 after the meeting ended? 19 A. About this meeting, no. 20 Q. Were there any -- did you have any 21 requests from her at the end of the meeting as 22 to this is what we need to have going forward or 23 this is what I need from you as far as the</p>	<p style="text-align: right;">Page 152</p> <p>1 needed back at Trace Crossings, so it was kind 2 of like just an acceptance, let's go forward. 3 Q. Okay. Did you talk about -- during 4 this time period, were you talking about any 5 issues you were having with Ms. Litaker and 6 these documents and that type of thing with Mr. 7 Craig? 8 A. Not to my memory. 9 Q. Okay. And after Ms. Litaker was 10 moved from the position at Trace Crossings, did 11 you have any discussions with Mr. Craig about -- 12 and this is up until the April 1st when she was 13 trying to negotiate her buyout. Were you 14 involved in any discussions with Mr. Craig about 15 where to put Ms. Litaker? 16 A. No. 17 Q. Did you have any further discussions 18 with him about the Bumpus position that was 19 open? 20 A. Again, and your question. 21 Q. Did you have any further 22 conversations with Mr. Craig about the Bumpus 23 assistant principal position that you knew was</p>

<p style="text-align: right;">Page 153</p> <p>1 going to be coming open about filling it with 2 somebody? 3 A. No. 4 Q. Did you have any discussions with 5 Donna Burke about that Bumpus assistant 6 principal position? 7 A. Yes. 8 Q. Okay. And did you share those 9 discussions with Mr. Craig? 10 A. This happened before -- yes, I did. 11 This happened before Ms. Litaker was removed 12 from Trace Crossings. 13 Q. And what was the discussion you had 14 with Donna Burke before Ms. Litaker was removed? 15 A. When we were looking at perhaps that 16 be a place for Ms. Litaker, we had been talking 17 about Bumpus as an option for -- I mean, we knew 18 there was an opening coming up. We knew we had 19 to add a position there as assistant principal. 20 In that discussion when it was during that week 21 when we were making a decision about Ms. 22 Litaker, we were thinking that might be a really 23 good place for her to go and that she might even</p>	<p style="text-align: right;">Page 155</p> <p>1 some point? 2 A. Shared what with Mr. Craig? 3 Q. What Ms. Burke had told you in your 4 meeting? 5 A. Yes, I did share that with Mr. Craig. 6 Q. And at that point, did y'all decide 7 that Bumpus would not be a good place for Ms. 8 Litaker? 9 A. Yes, we did. 10 Q. Did you ever convey that to Ms. 11 Litaker? 12 A. No. Ms. Burke had asked that that 13 conversation be kept confidential. I did ask if 14 I could share it with Mr. Craig and Ms. Veal, 15 and she was agreeable to that. 16 Q. Were you aware at some point that Ms. 17 Litaker, and I don't mean at some point. While 18 Ms. Litaker was still at central office, were 19 you aware at some point that she was involved in 20 discussions about moving to the assistant 21 principal position at Crossroads? 22 A. No. 23 Q. Okay. Was Crossroads something that</p>
<p style="text-align: right;">Page 154</p> <p>1 -- our perception at the time was she might even 2 appreciate that. 3 I called Dr. Maddox, the principal, 4 because before we would make that kind of offer 5 to Ms. Litaker, we wanted to make sure Dr. 6 Maddox was comfortable with it. Dr. Maddox took 7 the information. She said -- asked if she could 8 share that information with her assistant 9 principal, Ms. Burke. I said absolutely. 10 You're an administrative team. That needs to be 11 agreed upon. And at that point when Ms. Burke 12 was informed, she called my office and asked for 13 a meeting. 14 Q. Okay. 15 A. And in that meeting we discussed the 16 situation with Ms. Litaker. 17 Q. And had you been aware of that before 18 that meeting? 19 A. I knew Ms. Burke and Ms. Litaker were 20 good friends. I knew that for lots of years, 21 but I didn't -- I mean, I would have no reason 22 to even speculate beyond they were good friends. 23 Q. And you shared that with Mr. Craig at</p>	<p style="text-align: right;">Page 156</p> <p>1 came under your supervision as assistant 2 superintendent? 3 A. Yes. Well, the principal and I 4 worked very closely. And I worked with 5 discipline and appeals, and one component of 6 Crossroads was children who had lost the 7 privilege of attending their home high school or 8 middle school. So yes, we worked very closely 9 together. 10 Q. Did Crossroads have elementary 11 students? 12 A. No. 13 Q. Was there an alternative or -- is it 14 considered an alternative school? Is that the 15 appropriate -- 16 A. It's an alternative program. 17 Q. Alternative program. And I guess 18 this would be unusual. Is there an alternative 19 program for elementary students? 20 A. There are alternative programs for 21 elementary students, not in the same format that 22 Crossroads is for middle and high school. 23 Q. Okay. And what was the format of</p>

<p style="text-align: right;">Page 157</p> <p>1 Crossroads as a middle and high school?</p> <p>2 A. Crossroads has six through twelve.</p> <p>3 They have two schools within a school. One</p> <p>4 program is called Second Chance, and Second</p> <p>5 Chance is for those students who have lost the</p> <p>6 privilege through some type of disciplinary</p> <p>7 action of remaining on their home campus, drugs,</p> <p>8 alcohol, weapons. Those are slam dunks in terms</p> <p>9 of kids losing -- and it's not permanent. It's</p> <p>10 a temporary placement.</p> <p>11 The second program that's at</p> <p>12 Crossroads is called New Beginnings. Both of</p> <p>13 our high schools are very large, and some</p> <p>14 children just simply can't exist in that very</p> <p>15 large environment, because of emotional, social</p> <p>16 issues. They have to make an application. They</p> <p>17 work through the counselors at their home</p> <p>18 school. The counselors at the home school work</p> <p>19 with the counselor at Crossroads and the</p> <p>20 principal at Crossroads because some kids need</p> <p>21 that much more personalized programs and a much</p> <p>22 smaller environment. We have children who</p> <p>23 graduate out of that Second Chance program, I</p>	<p style="text-align: right;">Page 159</p> <p>1 Q. Did a position -- so a position was</p> <p>2 available at that time?</p> <p>3 A. No.</p> <p>4 Q. Do you know anything about the</p> <p>5 Crossroads position Ms. Litaker was offered?</p> <p>6 A. No.</p> <p>7 Q. Okay.</p> <p>8 A. I mean, let me back up. Do I know</p> <p>9 anything about it, yes. Assistant principal</p> <p>10 positions are open in all schools so I know what</p> <p>11 an assistant principal does.</p> <p>12 Q. And that was too broad of a question</p> <p>13 on my part. Do you know anything about this</p> <p>14 specific position? Is it something that</p> <p>15 somebody had been in and left or something that</p> <p>16 was newly created? Do you know anything about</p> <p>17 that?</p> <p>18 A. In November of 2012 to the best of my</p> <p>19 recollection, there was not a position at</p> <p>20 Crossroads.</p> <p>21 Q. Did something --</p> <p>22 A. Assistant principal position at</p> <p>23 Crossroads.</p>
<p style="text-align: right;">Page 158</p> <p>1 mean out of the New Beginnings program.</p> <p>2 Q. And at that time, who was the</p> <p>3 principal at Crossroads?</p> <p>4 A. At what time?</p> <p>5 Q. The time when Ms. Litaker was moved</p> <p>6 from Trace Crossings?</p> <p>7 A. I want to say it was Anna Whitney. I</p> <p>8 don't know that it was Anna Whitney for the</p> <p>9 entire time that Ms. Litaker was principal.</p> <p>10 Q. Who else was at Crossroads?</p> <p>11 A. Brian Cain, and oh, my goodness,</p> <p>12 there were like four or five before that.</p> <p>13 Q. And the time I'm really more</p> <p>14 concerned with is November 2012 through April of</p> <p>15 2013.</p> <p>16 A. Okay. I'm pretty sure that was Ms.</p> <p>17 Litaker -- Ms. Whitney.</p> <p>18 MS. YUENGERT: Whitney.</p> <p>19 A. I apologize.</p> <p>20 Q. And was there already an assistant</p> <p>21 principal at Crossroads under Ms. Whitney at</p> <p>22 that time?</p> <p>23 A. At that time, no.</p>	<p style="text-align: right;">Page 160</p> <p>1 Q. Did something become available in the</p> <p>2 first part of 2013?</p> <p>3 A. Again, I wasn't part of those</p> <p>4 staffing meetings and, typically, that's when</p> <p>5 that discussion would have been made. I don't</p> <p>6 know. I can't answer that.</p> <p>7 Q. In the past before you were moved to</p> <p>8 -- before you went to Trace Crossings, were you</p> <p>9 involved in staffing decisions for</p> <p>10 administration at Crossroads? Had you been?</p> <p>11 A. Yes.</p> <p>12 Q. And since Crossroads was an</p> <p>13 alternative program, in the past making those</p> <p>14 staffing decisions, were there any certain</p> <p>15 requirements you were looking for for</p> <p>16 administrators at Crossroads? I mean, were you</p> <p>17 looking for special Ed teachers or anything</p> <p>18 particular for teachers at Crossroads?</p> <p>19 A. We were looking for a person who had</p> <p>20 sensitivity to children, who knew how to work</p> <p>21 with kids at risk, because I would consider all</p> <p>22 the children at Crossroads at-risk children.</p> <p>23 Q. Okay.</p>

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1 A. And had that capacity for empathy,
2 had good skills in working with parents, because
3 the parent component there was very strong, too.
4 Q. Were any special certifications or
5 licenses required to work at Crossroads?
6 A. Administrative certification, if it
7 was an AP.
8 Q. Just the general -- the same that
9 would have been required at any school, same
10 administrative certification? There wasn't a
11 different certification required for Crossroads?
12 A. No, that's correct.
13 Q. And you have to be a little patient
14 because I don't know anything about --
15 A. I understand. We have our own --
16 just like you do, we have our own vocabulary.
17 Q. My sister is a teacher, but I don't
18 listen to her. All right. Were you involved at
19 all in any negotiations surrounding Ms.
20 Litaker's resignation?
21 A. No.
22 Q. Okay. You were involved back in 2012
23 with some meetings with David Fancher about some

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1 issues raised. You heard Ms. Veal talk about
2 today, correct?
3 A. Yes.
4 Q. If you look at Exhibit 16 and 17, is
5 16 something you drafted?
6 A. Yes, I typed that.
7 Q. Okay. And it's a conference summary
8 and future plan of action. Is that a form of
9 some sort or did you just --
10 A. I just typed it. There's no template
11 for it.
12 Q. Okay. Is there something in the
13 policy, procedure or anything that describes
14 what a future plan of action is?
15 A. Not to my knowledge.
16 Q. Okay. And what was the purpose of
17 creating this document and you and Dr. Fancher
18 signing off on it?
19 A. Documentation.
20 Q. And documentation of what?
21 A. Of the complaint that had been
22 registered by an employee at Bluff Park.
23 Q. Okay. And the meeting, according to

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1 this document, took place on April 12th, 2012,
2 correct?
3 A. Correct.
4 Q. Did you have any follow-up meetings
5 with Dr. Fancher regarding these issues?
6 A. Yes.
7 Q. And this future plan of action put in
8 place, did you decide to put that in place?
9 A. We agreed on it in the meeting that
10 these were some plans that we agreed upon, yes.
11 Q. You agreed upon it with Dr. Fancher?
12 A. Yes, sir.
13 Q. And Ms. Veal was present?
14 A. Yes.
15 Q. Was Mr. Craig involved in this at
16 all?
17 A. No.
18 Q. And Dr. Fancher was at Bluff Park
19 Elementary, correct?
20 A. That's correct.
21 Q. And as a result of any of these
22 issues that were raised by this employee and
23 your discussion with Dr. Fancher, did you ever

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1 discuss with anyone at Hoover, the possibility
2 of moving Dr. Fancher from the elementary school
3 principal position at Bluff Park?
4 A. As a result of this conference, did
5 you say?
6 Q. Yes.
7 A. Ask your question again.
8 Q. As a result of this conference, this
9 complaint, the complaints made by this employee,
10 did you discuss removing Dr. Fancher from the
11 principal position at Bluff Park?
12 A. No.
13 Q. Did you ever have any discussions
14 about removing Dr. Fancher from the principal
15 position at Bluff Park?
16 A. Did I have any discussions, no.
17 Q. Okay. Did Dr. Fancher's performance
18 improve after this conference as a result of
19 this action plan?
20 A. Again, restate your question. I'm
21 sorry. Just restate your question.
22 Q. The future plan of action, you had
23 meetings put in here. Did the issues improve

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1 that you met with him about after you
2 implemented this plan of action?
3 A. The issues that we discussed he --
4 yes, he very much worked on changing some of
5 those things that we had talked about during the
6 meeting.
7 Q. Okay. Did you talk with any of the
8 faculty and staff about these issues to make
9 sure that things were getting better?
10 A. No.
11 Q. Okay. How did you know things were
12 getting better at Bluff Park?
13 A. My frequency in the school, looking
14 at things, watching things, you know, as I go
15 into the school in terms of where is Dr.
16 Fancher, just that general sense as I observed
17 things when I would visit Bluff Park.
18 Q. Did you visit Bluff Park before this
19 April 12th meeting? Did you do observations or
20 walk-throughs or just school visits?
21 A. Yes, part of my responsibilities was
22 to go in all those schools.
23 Q. And did you notice that there was a
Page 166
1 problem at Bluff Park prior to this meeting?
2 A. No.
3 Q. Okay. You told me earlier that your
4 involvement with principals and schools was
5 mainly elementary and middle school, correct?
6 A. That's correct.
7 Q. And that Mr. Craig handles high
8 schools for the most part?
9 A. I did the evaluations of principals,
10 and I did work with the principals, but on the
11 day-to-day operational things, they would go
12 more to Mr. Craig than me.
13 Q. You're familiar with Chris Shaw?
14 A. I am.
15 Q. And did you evaluate his performance?
16 A. I did.
17 Q. And you were aware at some point he
18 moved from the principal position at Spain Park
19 to a planning director position?
20 A. That's correct.
21 Q. Were you involved in that decision to
22 move Mr. Shaw?
23 A. No.

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1 Q. Okay. Do you know why Mr. Shaw moved
2 from principal to planning director?
3 A. There were concerns expressed to Mr.
4 Craig.
5 Q. Okay. Who expressed those concerns
6 if you know?
7 A. I do not know.
8 Q. Do you know what those concerns were?
9 A. I have generic information just in
10 terms of, again, leadership within the building.
11 General direction of the school. Those concerns
12 were not brought to my attention directly.
13 Q. Okay. Did you ever have any
14 discussions with Mr. Craig about those concerns?
15 A. Mr. Craig and I discussed one major
16 concern that I was directly involved in. It was
17 brought to Mr. Craig's attention something about
18 dress code with the athletes at Spain Park High
19 School, and Mr. Shaw had changed something. I
20 can't remember the details, but it was something
21 about dress code.
22 In that discussion with Mr. Craig, he
23 came to me, asked me, gathering some information
Page 168
1 and some ideas about what if, what could we do.
2 My recommendation was to let me call Mr. Shaw
3 and talk to him about some things that had been
4 brought to the attention and perhaps we could
5 make Mr. Shaw the white knight kind of thing.
6 And I did talk to Mr. Shaw about that
7 situation with the dress code. Mr. Shaw chose
8 to keep the ruling that he had. He did not make
9 it. So I remember that. I remember that
10 discussion. I don't remember any other specific
11 discussions regarding Spain Park High School
12 with Mr. Craig and Mr. Shaw.
13 Q. Were you involved at all in the
14 creating of this planning director position that
15 Mr. Shaw was moved into?
16 A. I believe I was, yes.
17 Q. Tell me about that. What was your
18 involvement?
19 A. Mr. -- I think I wrote -- I gave Mr.
20 Craig some -- he shared with me typically what
21 his vision was, what his idea was, and he asked
22 me to put some things down in terms of a job
23 description. So I think I drafted something for

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1 him in terms of very generically what a job
2 description for that would be looking like.
3 Q. And did he have Mr. Shaw in mind when
4 he was --
5 A. Yes.
6 Q. And so just -- that was a very bad
7 question. He had Mr. Shaw in mind when he was
8 drafting this -- sharing his ideas with you for
9 you to draft the job description?
10 A. Well, I couldn't say that he did. I
11 know we talked about the possibility of Mr. Shaw
12 moving into that planning director position, and
13 he asked me to draft a -- he kind of told me
14 what he saw, envisioned for that planning
15 director and asked me to put together a job
16 description, a draft of a job description for
17 it.
18 Q. And what was -- just generally what
19 was that job, that job description, what were
20 the duties and responsibilities if you remember?
21 A. I don't remember. I would have to go
22 back and look at it.
23 Q. Do you recall it had something to do

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1 with the landscaping bids?
2 A. It did. But I only remember that as
3 a result of hearing Mr. Craig's deposition. I
4 would have to go back and look at it. I just
5 don't have enough -- that was very insignificant
6 to me. I wasn't right directly involved in it,
7 and I just really don't remember what was in
8 that piece of paper, what was on that piece of
9 paper.
10 Q. But Mr. Shaw was put in that
11 position?
12 A. Yes.
13 Q. And then left at some point to go to
14 Northview High School as principal. Do you
15 recall that?
16 A. Yes. He talked to me about that.
17 Q. Okay. And then, was anybody put in
18 that planning director position -- not assigned
19 the duties. I'm talking about actually put in
20 the position when Mr. Shaw left?
21 A. To my knowledge, no.
22 Q. When Ms. Litaker was moved from Trace
23 Crossings to the central office, did you have

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1 any similar discussions about any position ideas
2 or position descriptions that Mr. Craig had in
3 mind for the duties he had in mind for Ms.
4 Litaker?
5 A. I think -- again, please ask the
6 question again.
7 Q. You told me about drafting a position
8 description for the planning director when Chris
9 Shaw got that, and Mr. Craig had given you some
10 ideas, his ideas of what he wanted for the
11 position, and you drafted the position
12 description, correct?
13 A. Right.
14 Q. Did you have any kind of
15 conversations with Mr. Craig about creating a
16 position description for any duties he had in
17 mind for Ms. Litaker when she was moved from
18 Trace Crossings to the central office?
19 A. No.
20 Q. And as far as you know, was it the
21 intent that Mr. Shaw remain in that planning
22 director position at least through the end of
23 his principal contract, or do you have any idea

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1 on that?
2 A. I had that impression. I'm not quite
3 sure where I got the impression. I had the
4 impression he would.
5 Q. Did you ever have any conversations
6 with Bob Lawry about his moving from South
7 Shades Crest to the student services position?
8 A. No, not that I remember.
9 Q. You were at Trace Crossings then,
10 weren't you, or were you?
11 A. When Bob moved?
12 Q. When he moved, yes.
13 A. Yes.
14 Q. Okay. Prior to him moving, did you
15 have any discussions with him about any problems
16 with the school at South Shades Crest under his
17 leadership?
18 A. Yes.
19 Q. Tell me about that.
20 A. Day-to-day business.
21 Q. Okay. Anything that you thought
22 might have warranted looking at removing him
23 from South Shades Crest?

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1 A. No.

2 Q. And then you worked at Trace

3 Crossings as interim for over two years?

4 A. Yes.

5 Q. As interim. And then, when did you

6 become the -- when did that become a permanent

7 assignment?

8 A. This past spring.

9 Q. And that was under a different -- a

10 new superintendent?

11 A. An interim superintendent, yes.

12 Q. An interim superintendent. And who

13 is that?

14 A. Dr. Reese.

15 Q. Dr. Reese. And did you ask

16 eventually to be put in that position full-time

17 at Trace Crossings?

18 A. No.

19 Q. Were you asked and you agreed to it?

20 A. I was asked -- Dr. Reese -- yes, I

21 did. I was asked and, yes, I agreed to it. Dr.

22 Reese asked for me -- yes, I did.

23 Q. Did you ever have any discussions

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1 with Mr. Craig about, you know, you remaining at

2 Trace Crossings, going back to the board,

3 anything like that?

4 A. Yes.

5 Q. Did you ask to go back to the board,

6 to the assistant superintendent role?

7 A. No.

8 Q. Did you ask to be put at Trace

9 Crossings on a permanent basis?

10 A. No.

11 Q. Did he ever give you any indication

12 about how long he intended you to stay at Trace

13 Crossings?

14 A. At first it was simply assess the

15 situation, let's get a little bit of a better

16 handle on what goes on. And none of us, neither

17 of us looked at that in terms of how long -- we

18 never identified and talked about a timeline.

19 Q. I just want to get a couple of things

20 in the record.

21 MS. YUENGERT: Off the record.

22 (Whereupon, a discussion off the

23 record was held.)

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1 Q. The first one is an evaluation of Ms.

2 Litaker, dated January 13th, 2011. And is this

3 the evaluation you performed on Ms. Litaker?

4 A. Yes.

5 Q. And she was principal --

6 A. I think it has my signature on it.

7 Q. I don't see your signature. I may

8 have another one. I do have another one.

9 (Plaintiff's Exhibit No. 36 was

10 marked for identification.)

11 MS. YUENGERT: You're going to get to

12 a hundred.

13 Q. It doesn't have your signature

14 either, so --

15 A. I don't know because my signature

16 would be on those in the personnel file.

17 Q. Okay.

18 A. This looks to be my evaluation for

19 Ms. Litaker, though.

20 Q. It's the one that was used at her

21 deposition, so that doesn't make it any more

22 official to you, but the first year that Ms.

23 Litaker was at Trace Crossings, Debra Smith was

Page 176

1 her assistant principal, correct?

2 A. That's correct.

3 Q. Would there be an evaluation with

4 your signature? Would it have a -- the last

5 page has the composite knowledge skill score.

6 Is that something you would fill out?

7 A. No. We didn't use that in Hoover.

8 Q. Okay. And you do mention in the

9 collaborative processes and skills on the second

10 box you refer to the assistant principal, the

11 situation with Debra Smith applying for

12 principal and being upset and filing an EEOC

13 charge, correct? That's in the evaluation in

14 the second box on the first page.

15 A. Yes, right.

16 Q. Do you recall why you put that in the

17 evaluation?

18 A. I do. I thought it was important to

19 note that she was working with an assistant

20 principal that she identified concerns about.

21 Q. And the district was aware of those

22 concerns, correct?

23 A. Right.

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1 (Plaintiff's Exhibit No. 37 was
2 marked for identification.)
3 Q. And then the next evaluation I want
4 to show you does have your signature. It's
5 Exhibit 37. It's the 2012 evaluation from
6 February 8th, 2012. And is this the evaluation
7 you gave Ms. Litaker in February 8th, 2012?
8 A. It appears to be so, yes.
9 Q. Did Mr. Craig ever review these
10 evaluations of principals?
11 A. Periodically, yes. Most of the time
12 I would put the folder on his desk, allow him to
13 page through it. Again, most of the time when
14 he would review a summary evaluation, a
15 summative evaluation is when we were getting
16 ready with contract principals to renew
17 contracts.
18 Q. During the July 11th, 2012 meeting we
19 talked about earlier today, the meeting with Dr.
20 Camp and Dr. Dodson and Mr. Craig for the team
21 concept --
22 A. Right.
23 Q. -- did you ever mention that you

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1 thought maybe the teachers had tanked the test
2 results for that year?
3 A. Did I ever mention that?
4 Q. Yes.
5 A. When?
6 Q. During that meeting?
7 A. During that meeting, no.
8 Q. Did anyone ever mention that?
9 A. Not to my knowledge and not to my
10 recollection.
11 Q. Did you ever tell Robin at any point,
12 either right when she was interviewing for the
13 position at Trace Crossings or after, that you
14 thought it would take about three to five years
15 to turn that school around?
16 A. I don't remember a conversation like
17 that.
18 Q. Do you know if enrollment at the
19 school went up during Ms. Litaker's time at
20 Trace Crossings?
21 A. Do I know if the enrollment went up?
22 Q. Yes.
23 A. Again, I can't answer that question

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1 because the enrollment did not go up. To my
2 recollection, the enrollment declined.
3 Q. What's the enrollment doing -- how
4 has it been since you've been there?
5 A. It's declining.
6 Q. Is there any reason for that?
7 A. There's lots of movement with
8 apartment children. We have two very large
9 apartments that feed our school. It's a highly
10 transient area, and depending on where there are
11 apartment specials, move-in specials, parents do
12 move. The other thing during Ms. Litaker's --
13 and I have to say this because while the
14 enrollment was declining, she went from a
15 building that had K five or preschool through
16 five to preschool through four, so very
17 definitely, that was during Ms. Litaker's tenure
18 as principal there.
19 Q. So that decline would be -- some of
20 it would be --
21 A. A whole grade level was taken out,
22 yes.
23 Q. Any of the teachers who had

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1 complained about Ms. Litaker or the low morale,
2 those teachers that brought concerns to Ms. Veal
3 or that you were aware of prior to Ms. Litaker's
4 removal from Trace Crossings, are those teachers
5 still at Trace Crossings or have any of them
6 left?
7 A. Some have left. Some are still
8 there.
9 Q. Did any of them leave because they
10 felt things hadn't gotten any better or do you
11 know why they left?
12 A. I don't know.
13 Q. Have you had any teachers express
14 similar concerns after Ms. Litaker had left
15 about the same low morale, those same problems
16 from teachers?
17 A. Have teachers complained to me about
18 low morale? Is that what you're asking?
19 Q. Yes.
20 A. Since I've been at Trace Crossings?
21 Q. Yes.
22 A. They complained to me about low
23 morale when Ms. Litaker was there, yes.

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1 Q. But a continued low morale since Ms.
2 Litaker has left?
3 A. Would they come --
4 Q. I don't know.
5 A. No, they -- that --
6 Q. That wouldn't come to you. Do you
7 know if they've gone to Ms. Veal about that?
8 A. I'm not aware of any, no.
9 Q. Do you know if -- did the board ever
10 vote on Ms. Litaker's removal from Trace
11 Crossings?
12 A. Not to my knowledge.
13 Q. And did the board ever vote on your
14 placement at Trace Crossings prior to this past
15 spring?
16 A. No.
17 Q. And this past spring will be spring
18 of 2015, correct?
19 A. That's correct.
20 Q. Because who knows when we might
21 actually use this deposition. Off the record.
22 (Whereupon, a discussion off the
23 record was held.)

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1 Q. When Dana Clement started working as
2 the UniServ director that covered the Trace
3 Crossings area, did you have any conversations
4 with Ms. Litaker about any problems that Ms.
5 Litaker and Ms. Clements had had in the past?
6 A. In the past before situations at
7 Trace Crossings?
8 Q. Yes.
9 A. No, not that I recall. Can I go back
10 and clarify that, because I'm sitting here
11 thinking based on your -- I think there was a
12 conversation where Ms. Litaker told me at one
13 point that she and Ms. Clement had some type of
14 a confrontation or an argument or a discussion
15 perhaps, a heated discussion about the
16 difference between AEA and another organization,
17 and I don't even remember what the other
18 organization was. Something about the
19 differences between the two organizations maybe.
20 Q. Are you an AEA member?
21 A. Pardon?
22 Q. Are you an AEA member?
23 A. No.

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1 MR. JENT: Let's take two minutes and
2 I think I'm winding down.
3 (Whereupon, a brief recess was
4 taken.)
5 MR. JENT: That's all I have.
6 MS. YUENGERT: I just have a handful.
7 EXAMINATION
8 BY MS. YUENGERT:
9 Q. Ms. Barber, in the July meeting with
10 you and Mr. Craig and Ms. Litaker and Dr. Camp
11 and Mr. Dodson, you testified that there was
12 some discussion about transferring or Dr. Camp
13 and Ms. Litaker's suggestion that Michael Wesley
14 and Stella White be transferred out of Trace
15 Crossings, correct?
16 A. That was a direct request, those two
17 people, yes.
18 Q. Did they suggest where they go?
19 A. They recommended that they be
20 transferred to Gwin Elementary School.
21 Q. Did they suggest why Gwin?
22 A. Dr. Camp gave rationale for Mr.
23 Wesley and Ms. White are both African-American.

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1 We had a brand new principal, she had just been
2 identified at Gwin, who was African-American.
3 And I remember asking Dr. Camp the question why
4 would we want to transfer them to Gwin, and her
5 response was she felt that because they were
6 African-American, they might be more motivated
7 to perform under Ms. -- Dr. White's supervision,
8 because Dr. White was also African-American.
9 Q. Okay. You testified that Donna Burke
10 came to talk to you, and after that discussion,
11 you concluded that Bumpus would not be a good
12 fit for Ms. Litaker to go to, correct?
13 A. Correct.
14 Q. What was it that Ms. Burke told you
15 that made you think that wouldn't be a good fit?
16 A. Ms. Burke shared with me that Ms.
17 Litaker and she were involved in a relationship
18 and that it was a pretty longstanding
19 relationship and that they had broken up. I'm
20 going to use the word couple. I don't know if
21 Ms. Burke used that word or not, but that they
22 had departed. And she shared with me that part
23 of the difficulties she and Ms. Litaker had

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1 dealt with issues involving philosophical issues
2 involving education.
3 And Ms. Burke also indicated to me
4 that she was the one who initiated the breakup.
5 And in that very difficult conversation, my
6 perception very difficult conversation from Ms.
7 Burke, she shared with me that if we put Ms.
8 Litaker at Bumpus, it would be like a husband
9 and a wife who had recently gone through a
10 divorce working in the same building, and she
11 pleaded that we not do that. She thought it
12 would be very detrimental for her personally.
13 She also felt it would be very detrimental for
14 Ms. Litaker.
15 Q. Okay.
16 A. I want to add, too, and we were
17 trying to give Ms. Litaker an opportunity for
18 success, and after I heard that story, after Ms.
19 Burke shared that with me, I felt very strongly
20 that Ms. Litaker not be transferred to Bumpus
21 because of that would not be setting her up in
22 an opportunity for success, future success.
23 Q. Okay. You testified about your

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1 investigations regarding David Fancher. Do you
2 remember that testimony?
3 A. Yes.
4 Q. Do you investigate every employee
5 complaint about a principal the way you
6 investigated the complaint about Dr. Fancher?
7 A. No.
8 Q. Why did you investigate this
9 particular complaint?
10 A. Policy issues were involved,
11 harassment, sexual, racial overtones of sexual
12 and racial harassment.
13 Q. Okay. As a result of your
14 investigation, did you conclude that Dr. Fancher
15 had violated the harassment policy?
16 A. No.
17 Q. Did you conclude that Dr. Fancher had
18 violated any policy?
19 A. No.
20 Q. Did you conclude that he wasn't
21 performing adequately at Bluff Park?
22 A. No.
23 Q. After you finished your

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1 investigation, did you ever talk to the person
2 who had complained? Did you follow up with the
3 person who complained?
4 A. Yes.
5 Q. And tell me about that follow-up.
6 A. Ms. Veal and I both met with the
7 person who had filed the original complaint. We
8 shared with her what we had found. We shared
9 with her the process we had used. We shared
10 with her our findings. We also offered her the
11 opportunity, if she was still uncomfortable,
12 that she could move. There was an opening at
13 another school.
14 She was bookkeeper at Bluff Park, and
15 there was an opening, either right then or
16 coming up, that we had been informed about of a
17 retirement at Hoover High School. And we
18 offered her that opportunity to move from Bluff
19 Park to Hoover High School. She declined that
20 opportunity to move, and she chose to stay at
21 Bluff Park. She chose to drop it at that stage.
22 MS. YUENGERT: I don't have anything
23 else.

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1 MR. JENT: Just a couple of
2 follow-ups.
3 RE-EXAMINATION
4 BY MR. JENT:
5 Q. The conversation in July about the
6 African-American teachers, you said that was Dr.
7 Camp, correct?
8 A. Dr. Camp made that recommendation in
9 the meeting, yes, sir.
10 Q. Ms. Litaker did not mention the race
11 of those employees during the meeting?
12 A. Pardon me?
13 Q. Ms. Litaker didn't mention the race
14 of those employees during the meeting?
15 A. No, that was Dr. Camp who made the
16 comment. Ms. Litaker agreed to it.
17 Q. How do you know?
18 A. She was shaking her head.
19 Q. You never brought up the issue of --
20 well, back to that, did you have -- what was the
21 response to Dr. Camp about moving these
22 students?
23 MS. YUENGERT: Teachers.

<p style="text-align: right;">Page 189</p> <p>1 Q. Teachers, sorry.</p> <p>2 A. I knew what you meant. I responded</p> <p>3 adamantly because, first of all, there were not</p> <p>4 that many African-Americans at Trace Crossings.</p> <p>5 Moving two African-Americans out of Trace</p> <p>6 Crossings, one of whom Ms. Litaker had shared</p> <p>7 concerns about performance, to a brand new</p> <p>8 principal, she was in essence recommending</p> <p>9 taking people from her school, at least one that</p> <p>10 she was very concerned about in terms of</p> <p>11 performance, and moving it to another school</p> <p>12 where this principal, brand new principal had</p> <p>13 never been in a principal position before. So,</p> <p>14 yes, I was adamantly opposed to it.</p> <p>15 Q. Ms. Litaker never said anything</p> <p>16 verbally about that in that meeting? She never</p> <p>17 spoke about that issue that you recall?</p> <p>18 A. It was a general conversation and I</p> <p>19 can't say that she did. I can't say that she</p> <p>20 didn't either, but she was part of the</p> <p>21 conversation.</p> <p>22 Q. Okay.</p> <p>23 A. She didn't deny it.</p>	<p style="text-align: right;">Page 191</p> <p>1 C E R T I F I C A T E</p> <p>2</p> <p>3 S T A T E O F A L A B A M A)</p> <p>4 J E F F E R S O N C O U N T Y)</p> <p>5</p> <p>6 I HEREBY CERTIFY that the above</p> <p>7 and foregoing transcript was taken down by me in</p> <p>8 stenotype, and the questions and answers thereto</p> <p>9 were transcribed by means of computer-aided</p> <p>10 transcription, and that the foregoing represents</p> <p>11 a true and correct transcript of the testimony</p> <p>12 given by said witness.</p> <p>13 I FURTHER CERTIFY that I am</p> <p>14 neither of counsel, nor of any relation to the</p> <p>15 parties to the action, nor am I anyway</p> <p>16 interested in the result of said cause.</p> <p>17</p> <p>18</p> <p>19 /s/Tanya D. Cornelius</p> <p>20 TANYA D. CORNELIUS</p> <p>21 CCR No. 378</p> <p>22 Notary Expires 9/13/18</p> <p>23</p>
<p style="text-align: right;">Page 190</p> <p>1 Q. The Donna Burke issue, Ms. Litaker --</p> <p>2 the issue of Bumpus was, as far as you know,</p> <p>3 never brought up with Ms. Litaker as far as her</p> <p>4 moving to Bumpus?</p> <p>5 A. As far as I know, it was not brought</p> <p>6 up as an option. That's correct.</p> <p>7 MR. JENT: Give me two seconds and</p> <p>8 then we'll be right back.</p> <p>9 (Whereupon, a brief recess was</p> <p>10 taken.)</p> <p>11 MR. JENT: Just one more question.</p> <p>12 Q. The comments that you talked about</p> <p>13 that Ms. Camp made, the discussion that was</p> <p>14 going on about moving the teachers, the</p> <p>15 African-American teachers, did that play any</p> <p>16 role in the decision to move Ms. Litaker from</p> <p>17 Trace Crossings?</p> <p>18 A. Absolutely not.</p> <p>19 MR. JENT: Okay. That's all I have.</p> <p>20 MS. YUENGERT: I don't have anything.</p> <p>21 (Whereupon, deposition was concluded</p> <p>22 at 6:00 p.m.)</p> <p>23 FURTHER DEPONENT SAITH NOT</p>	

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**April 9, 2012 -
April 15, 2012**

**PLAINTIFF'S
EXHIBIT**

31

April 2012

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May 2012

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Monday, April 9

- 8:00am - 9:30am Staffing Needs Review (RBMS) - Barber, Carol
- 10:30am - 11:30am Dacia Radford (SMS-cheer; 529-9514) (CO)
- 1:00pm - 2:00pm GS Staffing (CO-1B) - Barber, Carol
- 4:30pm - 5:30pm recpt at comm. school building (BP Community Center)
- 5:30pm - 7:00pm Board Meeting (Bluff Park Community Center) ○

Tuesday, April 10

- 8:00am - 9:00am T of Y lunch (CO) - Barber, Carol
- 9:00am - 10:30am Staff Meeting - Craig, Andy
- 10:30am - 12:00pm Holly (HHS)
- 1:00pm - 2:00pm BP Staffing (CO-1B) - Barber, Carol
- 2:30pm - 3:30pm DV Staffing (CO-1B) - Barber, Carol

Wednesday, April 11

- 10:30am - 11:30am Dr. Shepherd
- 2:30pm - 3:30pm GV Staffing (CO-1B) - Barber, Carol

Thursday, April 12

- 8:00am - 9:00am David and Mary (C) 1B)
- 9:00am - 12:00pm HPTC/Tech Room
- 2:00pm - 3:00pm RC Staffing (CO-1B) - Barber, Carol

Friday, April 13

- 8:30am - 9:30am RR Staffing (CO-1B) - Barber, Carol
- 9:30am - 10:30am SM Staffing (CO-1B) - Barber, Carol
- 10:30am - 11:30am SSC Staffing (CO-1B) - Barber, Carol
- 11:30am - 12:30pm TC Staffing (CO-1B) - Barber, Carol

Saturday, April 14

- 8:00am - 1:30pm Work
- 2:00pm - 4:00pm HCS Math Tournament (BMS)
- 2:00pm - 4:00pm Math Tournament (BMS)
- 4:00pm - 8:00pm Baby sit for norah

Sunday, April 15

- 8:00am - 2:00pm Work

**July 9, 2012 -
July 15, 2012**

July 2012
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August 2012
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Monday, July 9

- 9:00am - 10:00am Principal Meeting Agenda (CB's office) - Barber, Carol
- 10:00am - 11:00am Review Meeting (CR) - Barber, Carol

Tuesday, July 10

- 7:00am - 8:00am Leave for T Town with RR people (CO)
- 8:00am - 12:30pm Ed Alabama Panel (Tuscaloosa)

Wednesday, July 11

- 9:00am - 10:00am Salary Schedule Review (AC's office) - Barber, Carol
- 10:00am - 11:00am FW: Meeting with D. Camp & R. Litaker - White, Louise
- 2:00pm - 3:00pm Leave for the Beach
- 3:00pm - 4:00pm Ice Creal social (CO)

Thursday, July 12

Friday, July 13

Saturday, July 14

Sunday, July 15

**July 16, 2012 -
July 22, 2012**

July 2012						
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Monday, July 16

- 7:30am - 9:00am Planning Meeting with R. Litaker (TC) - Barber, Carol
- 9:30am - 11:00am K Wheaton (BMS)
- 5:00pm - 7:00pm Board meeting (Board Room)

Tuesday, July 17

- 8:30am - 10:00am Principal Meeting (all) (Tech Room) - Barber, Carol
- 11:30am - 12:30pm Review Meeting (Operations) - Barber, Carol

Wednesday, July 18

- 9:00am - 10:00am Scott Mitchell (BGIS) - Barber, Carol
- 10:30am - 11:00am Tamala (RBMS)
- 2:00pm - 2:30pm Ipad and Nook worksession (Andy's Conference room) - Phillips, Bryan
- 3:00pm - 4:00pm EDP Allocations (Andy's conf. room) - Barber, Carol

Thursday, July 19

- 10:00am - 11:30am LEAD AL Training (Tech Room)

Friday, July 20

Saturday, July 21

- 11:00am - 2:00pm Norah's Birthday Party (Barber's house)

Sunday, July 22

**July 23, 2012 -
July 29, 2012**

July 2012
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August 2012
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Monday, July 23

- 7:30am - 8:30am Kecia Elrod (co)
- 10:00am - 11:30am LEAD AL Training (Tech Room)

Tuesday, July 24

- 7:30am - 8:30am Streeter Conference (Central Office) - Barber, Carol
- 9:00am - 10:00am Webinar for LEAD AL
- 11:30am - 1:00pm Birthday Lunch (TBA) - Barber, Carol
- 2:00pm - 3:00pm Meeting re. Reading Coach (SME) - Barber, Carol

Wednesday, July 25

- 7:30am - 8:30am Follow Up Meeting (BP) - Barber, Carol
- 9:30am - 11:00am Salary Schedule Review (Andy's Conf Room) - Barber, Carol
- 11:00am - 12:00pm TC Planning (CB's office) - Barber, Carol
- 2:00pm - 3:30pm LEAD AL Training (Tech Room)

Thursday, July 26

- 7:30am - 9:00am EDP Meeting (CR Library) - Barber, Carol
- 10:00am - 11:00am Bus Routes to Hoover Hall (HHS) - Barber, Carol
- 2:00pm - 3:00pm Virtual AL School Safety (CB's Office) - Barber, Carol
- 3:30pm - 4:30pm Mary Rains and REDA (CO) - Barber, Carol
- 5:00pm - 5:30pm AYP Accountability results review (Andy's conference room) - Dodson, Ron

Friday, July 27

Saturday, July 28

Sunday, July 29

July 30, 2012 - August 5, 2012

July 2012						
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Monday, July 30

- 8:00am - 9:30am LEAD AL Training (Tech Room)
- 9:30am - 11:00am SAT Meeting (CO - Tech Room) - Kellough, Marion
- 1:00pm - 2:00pm JoAnn Dicky (CO)
- 2:00pm - 3:00pm PEPE ESR (CB's Office) - Barber, Carol
- 3:00pm - 4:00pm Barber to RES (RES) - Turney, Alice

Tuesday, July 31

- 8:00am - 11:00am Team Planning (TC) - Barber, Carol
- 11:00am - 12:00pm Diane (RC)
- 12:00pm - 1:00pm CR
- 1:00pm - 1:30pm HHS
- 1:30pm - 2:00pm TC
- 2:00pm - 3:30pm Student Support Services Planning (1B at CO) - Barber, Carol

Wednesday, August 1

- 8:00am - 9:00am SIR Training (CR Library)
- 9:00am - 9:30am Mo Robbins (Taylor Publishing) (GW) - Barber, Carol
- 11:00am - 11:30am Ipad/Nook update/ Questions/Answers (Andy's Conference) - Phillips, Bryan
- 1:00pm - 2:00pm SIR Training (CR Library)
- 3:00pm - 4:30pm Planning for National Forensic Tournament (CO room 1B) - Barber, Carol

Thursday, August 2

- 8:00am - 1:00pm Associate Principal Interviews (BMS) - Barber, Carol
- 1:00pm - 1:30pm Title I (Central Office) - Gurosky, Linda

Friday, August 3

- 8:00am - 9:00am Board Meeting (CO)
- 9:00am - 9:30am Transportation Issues (CB's office) - Barber, Carol
- 9:30am - 10:30am Review of HUD funding (CB's office) - Barber, Carol
- 12:30pm - 1:00pm HHS and TC
- 1:00pm - 1:30pm Gwin
- 1:30pm - 2:00pm SPHS

Saturday, August 4

Sunday, August 5

August 6, 2012 - August 12, 2012

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September 2012
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Monday, August 6

Tuesday, August 7

- 7:30am - 8:30am Staffing and EDP questions (Gwin) - Barber, Carol
- 9:00am - 10:00am Wayne and Lisa (CR)
- 10:00am - 11:00am SM staff (McDonalds)
- 11:00am - 12:00pm Discussions re. CNP/EDP workers (CB's) - Barber, Carol
- 1:30pm - 4:00pm RESCHEDULED WEBSITE, WEBMASTER DUTY, MISC. COMMUNICATION/TECH DISCUSSION MEETING (SUPT'S OFFICE) - Gaston, Jason

Wednesday, August 8

Thursday, August 9

- 7:30am - 9:00am New Teachers (BMS Library)
- 11:30am - 12:30pm TC

Friday, August 10

- 10:30am - 1:30pm Team Planning (CO)

Saturday, August 11

Sunday, August 12

August 13, 2012 - August 19, 2012

August 2012						
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Monday, August 13

- 8:00am - 9:00am GS
- 9:00am - 10:00am SPHS
- 10:00am - 11:00am BMS
- 11:00am - 11:30am GV
- 11:30am - 12:00pm GW
- 12:00pm - 12:30pm BP
- 12:30pm - 1:00pm SM
- 1:00pm - 1:30pm CR
- 5:30pm - 7:30pm Board Meeting (Board Room) ○

Tuesday, August 14

- 7:30am - 12:00pm Institute Prep
- 2:30pm - 3:30pm Hunter Street--Practice
- 4:00pm - 5:00pm Barbara

Wednesday, August 15

- 8:30am - 9:30am RC
- 9:30am - 10:00am HHS
- 10:00am - 11:00am SROs (Operations Meeting Room)
- 11:00am - 11:30am TC
- 1:30pm - 2:00pm GV

Thursday, August 16

- 7:45am - 8:45am Snacks (Hunter Street Bap Church)
- 9:00am - 12:00pm Institute (Hunter Street Baptist Church)

Friday, August 17

- 7:30am - 8:00am DV
- 8:00am - 8:30am BGIS
- 8:30am - 9:00am Bumpus
- 9:00am - 10:00am RR
- 12:00pm - 1:00pm Nancy-lunch (Panera Bread)

Saturday, August 18

Sunday, August 19

August 20, 2012 - August 26, 2012

August 2012						
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Monday, August 20

■ 10:00am - 11:00am Marion and Liz (CR Campus)

Tuesday, August 21

■ 9:00am - 10:00am Dr. Collins (CO)

Wednesday, August 22

■ 9:00am - 9:30am N.F.L. Nat'l Forensics League Tournament Meeting (Mrs. Barber's office) - Gaston, Jason
 ■ 1:00pm - 2:00pm Debby Carroll and ^{RE} (SM)
 ■ 2:30pm - 3:00pm S. Wood & Cathy (CO)

Thursday, August 23

■ 7:30am - 8:30am Mrs. Cofield (256, 326-1180) (CO)
 ■ 8:30am - 9:30am CS50 report (Andy's office) - Dodson, Ron
 ■ 11:00am - 12:00pm Mary and Anna (CR) - Barber, Carol
 ■ 4:00pm - 6:30pm Bryan (Shampoo)

Friday, August 24

■ 7:00am - 9:00am Kathy (BMS)
 ■ 9:00am - 9:30am CO
 ■ 10:00am - 11:00am Robin and parent (TC)

Saturday, August 25

Sunday, August 26

August 27, 2012 - September 2, 2012

August 2012							September 2012						
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Monday, August 27

- 7:30am - 8:30am Meeting with Chris Riney (CR campus) - Barber, Carol
- 9:30am - 11:00am SAT MEETING (CO - Tech Room) - Kellough, Marion
- 2:00pm - 3:30pm EDP Review (CB's office) - Barber, Carol
- 4:30pm - 5:30pm M. Black (CO)
- 5:30pm - 6:30pm AASB District 5 Board Conference - RECEPTION AT 530, EVENT AT SIX (SPAIN PARK HIGH SCHOOL) - Gaston, Jason

Tuesday, August 28

- 8:00am - 9:00am Review Meeting (CB's office) - Barber, Carol
- 9:30am - 10:30am Bob Austin (CO)

Wednesday, August 29

- 7:30am - 9:30am LEAD Alabama Addendum (CO-1B) - Barber, Carol
- 10:00am - 11:00am Staffing Review (GV) - Barber, Carol
- 1:00pm - 3:00pm VAL ED Training (Un of Montevallo--Phelham Inservice Center)
- 6:00pm - 8:00pm Kathy for dinner

Thursday, August 30

- 8:00am - 9:30am Review of Registration Procedures (CO--Tech Room) - Barber, Carol
- 10:00am - 11:00am TC visit
- 1:00pm - 2:00pm Emily Kohn--Am Heart Association (205, 266-1506)
- 4:00pm - 6:00pm State Board Meeting (HCS Board Room) - White, Louise

Friday, August 31

- 8:00am - 9:00am Assembly for Chris (BGIS)
- 9:30am - 10:30am DV Issues (CB's office) - Barber, Carol

Saturday, September 1

Sunday, September 2

September 10, 2012 - September 16, 2012

September 2012

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October 2012

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Monday, September 10

- 7:30am - 8:30am D Camp (CO)
- 5:00pm - 7:00pm Board Meeting (Board Room) ○

Tuesday, September 11

- 8:30am - 9:30am Meeting with Charlene (HHS) - Barber, Carol
- 10:00am - 12:00pm TC 3rd Grade Walk-Throughs (TC) - Barber, Carol
- 1:15pm - 2:15pm Meeting with Ron, Andy and Carol (CR campus) - Barber, Carol
- 3:00pm - 4:00pm Meeting with Wiley Lott (SP parent) (C.O.) - White, Louise

Wednesday, September 12

- 9:00am - 10:30am TC 3rd grade team planning (Math) (TC) - Barber, Carol
- 10:30am - 11:30am K long (Hoover hall)

Thursday, September 13

- 2:00pm - 3:00pm Planning Session for Principal Meetings (CBs Office) - Barber, Carol
- 3:00pm - 3:30pm LEAD Ala planning (Carol's office) - Dodson, Ron

Friday, September 14

- 8:00am - 9:00am CO group breakfast (Bring casserole (sausage and egg or ???))
- 9:30am - 10:30am Walkthrough - Debriefing Meeting (Trace Crossings - Conference Room) - Litaker, Robin
- 11:00am - 12:30pm Elementary Principals (SSC) - Barber, Carol

Saturday, September 15

Sunday, September 16

September 17, 2012 - September 23, 2012

September 2012

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October 2012

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Monday, September 17

- 9:00am - 10:00am Robin (TC)
- 10:00am - 11:00am TC 3rd Walk-Throughs (TC) - Barber, Carol
- 11:30am - 12:30pm Hoover Coalition (GV Bap Church)
- 1:00pm - 2:00pm Jeff (GV)
- 2:00pm - 3:00pm Beth Johnson (Thweatt) (CO)
- 3:00pm - 4:00pm Wood and Bonner (CB's office)

Tuesday, September 18

- 8:30am - 10:00am Elementary Principal Meeting (Tech room) - Barber, Carol
- 11:00am - 12:00pm Mrs. Harden (BP)
- 6:00pm - 7:00pm Town Hall meeting--Spice (SMS)

Wednesday, September 19

Thursday, September 20

- 7:00am - 8:00am Hoover City Schools Foundation Meeting (Central Office) - Diana Knight
- 9:00am - 10:30am Secondary Principal meeting (Tech room) - Barber, Carol
- 2:00pm - 3:00pm Meeting with S. Wood (Room 1B) - Barber, Carol
- 3:30pm - 4:00pm Review Alternate Meal Reimbursement Process (Andy's meeting room) - Antee, Cathy

Friday, September 21

- 9:00am - 10:00am Walk-through (SPHS) - Barber, Carol
- 1:00pm - 2:00pm SDE meeting with CCRS Implementation Team (1-B) - Dodson, Ron
- 2:15pm - 2:45pm yesterdays conversation (Mary Veals Office) - Wood, Susan

Saturday, September 22

Sunday, September 23

September 24, 2012 - September 30, 2012

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Monday, September 24

- 7:45am - 8:45am B Mayer Meeting (CB's office) - Barber, Carol
- 9:30am - 11:00am Student Assistance Team (CO Tech Room) - Kellough, Marion
- 1:00pm - 2:00pm James K. (Operations) - Barber, Carol
- 4:00pm - 5:00pm Nancy Prickett (CO)
- 5:30pm - 8:00pm Sp Ed Parents with Dr. Bice (CP Center)

Tuesday, September 25

- 9:00am - 10:00am Virtual Alabama (Barber's office) - Barber, Carol
- 9:09am - 9:45am Ad hoc meeting (acraig@hoover.k12.al.us) - Barber, Carol
- 4:00pm - 5:00pm Dave Scott (CO)

Wednesday, September 26

- 8:30am - 3:30pm CLAS Conference--156 miles (Marriott Legends, Prattville, AL) - White, Louise

Thursday, September 27

- 8:00am - 9:30am Finalize Recommendations from P Meetings (1B) - Barber, Carol
- 10:00am - 11:00am TC 3rd Walk-Throughs (TC) - Barber, Carol
- 11:30am - 1:00pm Anna (CR)
- 2:00pm - 3:00pm Birthday Celebration (Kitchen)
- 4:00pm - 6:00pm Val Ed Webinar

Friday, September 28

- 7:30am - 8:30am CRDC Review (CO-1B) - Barber, Carol
- 2:00pm - 3:00pm Brian and Ron (SMS)

Saturday, September 29

- 12:00pm - 2:30pm Work
- 2:30pm - 5:30pm Band Competition (SPHS)

Sunday, September 30

- 1:30pm - 4:00pm Work

October 1, 2012 - October 7, 2012

October 2012

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November 2012

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Monday, October 1

- 9:30am - 10:30am Dr. Denton (Nan Petrie) (Brookwood)
- 1:00pm - 2:00pm James K. (Operations) - Barber, Carol
- 2:30pm - 3:30pm CIP Review (CB's Office) - Barber, Carol

Tuesday, October 2

Wednesday, October 3

- 11:30am - 1:30pm Stress test with Dr Rayburn (3980 Colanade parkway)

Thursday, October 4

- 9:00am - 11:00am - Read for the Record (TC)
- 11:00am - 12:00pm Bumpus
- 12:00pm - 1:30pm Lunch with Judy (TBA)
- 1:30pm - Pick up dinner for D. Murphy
- 5:00pm - 5:30pm Dinner to D. Murphy's house

Friday, October 5

- 7:30am - 9:00am EDP Meeting (CR Library) - Barber, Carol
- 9:00am - 10:00am Rocky Ridge Fire Department Snacks (Kitchen) - Barber, Carol
- 1:45pm - 2:45pm Dr Rayburn (CVA)

Saturday, October 6

- 8:30am - 2:00pm BP Art Show

Sunday, October 7

October 8, 2012 - October 14, 2012

October 2012						
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Monday, October 8

☐ Columbus Day (United States)

- 9:00am - 10:00am James and Johnny Horton (Transportation)
- 10:00am - 11:00am SMS
- 2:00pm - 3:00pm NFL (Scott Wunn) and O. Parker (CO)
- 4:30pm - 5:00pm Recpt for Retirees (Tech Room)
- 5:00pm - 7:00pm Board Meeting (Board Room) ☐

Tuesday, October 9

- 9:30am - 11:00am Endoscopy (Brook wood Dr Denton)
- 6:00pm - 8:00pm SP Academic Banquet (Gahaba Grand Conference Center)

Wednesday, October 10

- 10:00am - 11:00am Math Classroom Visits (TC) - Barber, Carol
- 1:30pm - 2:30pm Ed AL meeting (Student Services Center) - Barber, Carol

Thursday, October 11

- 10:30am - 11:00am Meeting with C. anthony/Craig (C.O.) - White, Louise
- 11:30am - 1:30pm Robin (TC)
- 5:15pm - 6:45pm Kim (Saphire)

Friday, October 12

- 6:30am - 8:30am Lisa (SMS)
- 8:30am - 9:00am Kim (Gwin)
- 10:00am - 11:00am Planning for Principal Meetings (CB's office) - Barber, Carol

Saturday, October 13

Sunday, October 14

October 15, 2012 - October 21, 2012

October 2012							November 2012						
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Monday, October 15

- 10:00am - 11:00am Math Classroom Visits (TC) - Barber, Carol
- 1:30pm - 2:30pm Amanda and Mary (CO)
- 3:00pm - 4:30pm Meeting with Wilson Nash re. Shaw/Allen Case (Room 1B @ CO) - Barber, Carol

Tuesday, October 16

- 8:30am - 10:00am Elementary Principal Meeting (Tech Room) - Barber, Carol
- 11:00am - 12:30pm Math Walkthroughs (Trace) - Litaker, Robin
- 1:00pm - 2:00pm Planning for Virtual Alabama (CB's office) - Barber, Carol

Wednesday, October 17

- 9:00am - 10:00am Meeting re. NFL--with city folks (City Hall)
- 11:30am - 12:00pm Pick up Coasta's food for Mary JO (Coasta)
- 1:30pm - 2:30pm Flu Shot (GS)

Thursday, October 18

- 7:00am - 8:00am Hoover City Schools Foundation Meeting (Central Office) - Diana Knight
- 9:00am - 10:30am Secondary Principal Meeting (Tech Room) - Barber, Carol
- 11:00am - 12:30pm Meeting with J. Howton (CO Room 1B) - Barber, Carol
- 1:00pm - 10:00pm Leave for Eufala; funeral for R. Powell (Eufala)

Friday, October 19

- 8:30am - 9:30am Meeting with LaJarron (CR)
- 11:00am - 12:00pm Mrs. Hill (SMS Parent) (CO)

Saturday, October 20

- 3:00pm - 5:00pm SPSHS Band Performance (HHS)

Sunday, October 21

- 5:00pm - 6:00pm Nature Trail Dedication (Bumpus)

October 22, 2012 - October 28, 2012

October 2012

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Monday, October 22

- 8:30am - 3:30pm Common Core for Principals Conference (Marriott Legends in Prattville) - Barber, Carol
- 5:00pm - 6:00pm Field Dedication (Shades Mountain)

Tuesday, October 23

- 10:00am - 11:00am Brian (SMS)
- 2:00pm - 3:00pm CNP planning meeting (CB's office) - Barber, Carol

Wednesday, October 24

- 6:45am - 7:45am D. Sweeney with HHS Cochas (HHS Theatre)
- 8:30am - 9:30am Green Alert Review (Crossroads--CR's office) - Barber, Carol
- 1:30pm - 2:30pm 360 Survey Review (CB's Office) - Barber, Carol

Thursday, October 25

- 7:15am - 7:45am Gwin
- 8:00am - 9:30am threat assessment mtg (TC)
- 10:00am - 11:00am AdvancEd Update (CB's office) - Smith, Debra
- 5:00pm - 7:00pm SMS/Bumpus FB (SMS) - Barber, Carol

Friday, October 26

- 8:00am - 8:30am PLP Review (CB's office) - Barber, Carol
- 10:00am - 10:30am Math Classroom Visits (TC) - Barber, Carol
- 10:30am - 12:00pm SMS--Musical
- 1:00pm - 2:00pm SDE webinar Principal Candidate Residency (Andy's conf room) - Dodson, Ron
- 2:30pm - 3:00pm drug testing (crossroads) - Anthony, Carissa
- 4:45pm - 5:45pm Jerri (Full Moon)

Saturday, October 27

Sunday, October 28

October 29, 2012 - November 4, 2012

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Monday, October 29

- 8:15am - 9:15am Robin Cook (CO 1B) - Barber, Carol
- 9:30am - 11:00am SAT MEETING (CO Tech Room) - Kellough, Marion
- 6:00pm - 6:30pm Dwight Owens--refreshments (Library)
- 6:30pm - 7:30pm Dwight Owens Program (HHS Library)

Tuesday, October 30

- 7:30am - 8:00am PLP Review (SMS) - Barber, Carol
- 8:30am - 10:00am CIP reviews (CO tech room) - Dodson, Ron
- 11:00am - 11:30am D. Fancher visit (BP) - Barber, Carol
- 2:00pm - 3:00pm Meeting with Robin re. partnerships (TC) - Barber, Carol
- 4:30pm - 5:30pm J. Tinney (Jerri's house)

Wednesday, October 31

- Halloween (United States)
- 1:15pm - 2:00pm Trick or Treaters from RR (CO)
- 2:00pm - 3:00pm Review of Organizational Chart, etc. (AC's BIG office) - Barber, Carol

Thursday, November 1

- 8:00am - 9:00am Drug Testing Review (CR Campus) - Barber, Carol
- 10:00am - 11:00am Math Classroom Visits (TC) - Barber, Carol
- 1:00pm - 1:30pm Conf call with Anna and Lisa re. postage machine
- 2:30pm - 3:00pm SPSHS for Patriotic Pep Rally (SPHS)
- 4:00pm - 5:00pm Sean King (58B-9122) (CO)

Friday, November 2

- 8:00am - 9:00am Review/catch up meeting (CB's office) - Barber, Carol
- 9:30am - 10:30am Robin, Tamala, Dana, Mary (CO 1 B)
- 1:30pm - 2:30pm Kevin Erwin (CO)

Saturday, November 3

- 8:00am - 3:30pm E Learning Day
- 9:00am - 10:00am Dr. Skler (1830 14th Ave south 933-8273)

Sunday, November 4

November 5, 2012 - November 11, 2012

November 2012						
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Monday, November 5

- 10:00am - 11:00am Dwight, Ken, Mary, Bryan (1B)
- 11:30am - 1:00pm Hoover Coalition Meeting (Green Valley Baptist Church- Adult Education Building - Rm 203B) - Anthony, Carissa

Tuesday, November 6

- ☐ Election Day (United States)
- 8:00am - 9:00am CIP Development with W. Smith (CB's office) - Barber, Carol
- 9:30am - 10:30am D. Camp (CO)
- 11:00am - 12:00pm M. Kellough (CO)
- 3:30pm - 4:30pm Robin (CO)

Wednesday, November 7

- 9:00am - 10:00am Angela Freeman meeting (1B) - Barber, Carol
- 10:30am - 11:30am Bus Issues (TC) - Barber, Carol
- 2:00pm - 3:00pm W. Nash and S. Snoddy (CO)

Thursday, November 8

- 1:00pm - 2:00pm Vet's Day Program (RC Gym)
- 6:15pm - 7:00pm Jazz Band (HHS Theatre)

Friday, November 9

- 9:00am - 10:00am Veterans' Day Program (Green Valley) - Barber, Carol
- 10:00am - 11:00am TC Math (TC) - Barber, Carol
- 11:00am - 12:00pm Robin (TC)
- 1:30pm - 2:30pm Catch-up with Carol - Dodson, Ron

Saturday, November 10

Sunday, November 11

- ☐ Veteran's Day (United States)

November 12, 2012 - November 18, 2012

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Monday, November 12

■ 3:30pm - 4:30pm Robin (CO)

Tuesday, November 13

■ 9:00am - 10:00am District Threat Assessment (BMS)
 ■ 10:00am - 11:30am Math Obs (TC)
 ■ 2:00pm - 3:00pm Meeting with Dwight, Bryan, Mary (CO--18) - Barber, Carol
 ■ 5:00pm - 7:00pm Board Meeting (Board Room) ○

Wednesday, November 14

■ 1:30pm - 2:30pm Review of 360 Competencies (CB's Office) - Barber, Carol
 ■ 2:30pm - 3:30pm Wayne
 ■ 3:30pm - 4:30pm Retirement Celebration for Susan Holmes (RC)
 ■ 6:30pm - 8:30pm Christmas at Caroline House

Thursday, November 15

■ 7:00am - 8:00am Foundation (Tech room)
 ■ 11:45am - 1:10pm City employee lunch (Hoover country club)
 ■ 4:00pm - 5:30pm Robin and Andy (Co)

Friday, November 16

■ 7:30am - 8:00am PLP Review (CR campus) - Barber, Carol
 ■ 8:00am - 8:30am PLP Review (CR campus) - Barber, Carol
 ■ 11:00am - 12:00pm RR for Lunch (RR)
 ■ 3:00pm - 4:00pm TC Faculty (TC)

Saturday, November 17

Sunday, November 18

**November 19, 2012 -
November 25, 2012**

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Monday, November 19

Tuesday, November 20

Wednesday, November 21

Thursday, November 22

☐ Thanksgiving Day (United States)

Friday, November 23

Saturday, November 24

Sunday, November 25

November 26, 2012 - December 2, 2012

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Monday, November 26

- 8:00am - 10:15am Classroom visits (TC) - Barber, Carol
- 9:15am - 9:45am PTO Meeting (TC-)
- 12:15pm - 1:45pm Classroom visits (TC) - Barber, Carol
- 2:55pm - 3:55pm Faculty meeting (TC)
- 5:00pm - 6:00pm Mrs Day (CO)

Tuesday, November 27

- 8:00am - 9:00am Preschool visit (TC)
- 8:30am - 9:30am PTO committee mtg (TC Conf Room)
- 10:30am - 11:00am Student Review Meeting (CB's office) - Barber, Carol
- 11:00am - 12:30pm Meeting with Amanda and CB - Barber, Carol
- 1:00pm - 2:00pm IEP with Shannon Mooney
- 3:30pm - 4:30pm L. White (CB's office)
- 6:30pm - 8:00pm Parent Meeting (TC Cafe)

Wednesday, November 28

- 9:00am - 10:00am 3rd grade team meeting (Colby's Room) - Colby, Erica
- 10:10am - 11:10am 2nd team meeting (Room 102) - Barber, Carol
- 11:15am - 12:15pm Shelly and Debbie (CB's office)
- 12:30pm - 1:00pm Interview with Conner
- 1:30pm - 3:00pm Meeting with Tami and CB - Barber, Carol

Thursday, November 29

- 8:00am - 9:00am 4th team (Science Lab)
- 9:30am - 10:00am Office Staff (CB's office)
- 11:20am - K team
- 11:45am - 12:45pm 1st team
- 1:00pm - 2:00pm PST (Science Lab)
- 1:45pm - 2:30pm Specials Team Meeting (Library) - Stone, Amanda

Friday, November 30

- 8:00am - 9:00am Julie Renta (TC)
- 11:30am - 12:30pm Mtg with Amanda, Ellen, Tami, Gayle, Judy and ANGI - Barber, Carol
- 12:30pm - 1:30pm REDA IEP

Saturday, December 1

- 8:00am - 10:00am Bryan (Shampoo)
- 11:00am - 1:00pm Roy and Vickie--40th (Julie's home 716 Donna Drive, Vestavia)

Sunday, December 2

Barber, Carol

From: Dana.Clement@alaedu.org
Sent: Tuesday, November 13, 2012 6:19 PM
To: Barber, Carol
Cc: Veal, Mary
Subject: Trace Crossings

Dear Mrs. Barber,

Thank you so much for meeting with me last week to discuss employee concerns at Trace Crossings. Since our meeting I have continued to receive phone calls and messages from faculty and staff. The most recent calls have been to express growing concerns related to the assistant principal, Ms. Stone. It seems many at the school are concerned that Ms. Litaker is attempting to address problems at the school by placing blame on Ms. Stone and stating she was not aware that Ms. Stone had made certain decisions. My members in the building seem to hold Ms. Stone in high esteem and feel she is being placed in a bad position, one that may require her to defend herself to you and other administrators.

I have assured those who are calling me that I would pass their concerns on to you and Mary. I do not personally know Ms. Stone, but I wanted to express to you the concerns many are having for her at this time.

Please do not hesitate to contact me if you have additional questions.

Thank you.

Dana

**PLAINTIFF'S
EXHIBIT**

32

Subject: FW: TC Information ...
From: Litaker, Robin (rlitaker@hoover.k12.al.us)
To: robinlitaker@yahoo.com;
Date: Tuesday, September 17, 2013 7:17 AM

**PLAINTIFF'S
EXHIBIT**

33

From: Litaker, Robin
Sent: Thursday, March 21, 2013 9:08 AM
To: robinlitaker@yahoo.com
Subject: FW: TC Information ...

From: Craig and Kristi Tolbert [mailto:tolberts4@charter.net]
Sent: Friday, November 16, 2012 4:34 PM
To: Barber, Carol; pbbruner@gmail.com; heglas@bellsouth.net; kso@theowens.org; leannperrycpa@charter.net; jpopinski@graphicswearhouse.com; clayandheather@bellsouth.net; tadairward@gmail.com; ericandsamantha@bellsouth.net; t_dar_t@yahoo.com; ransom224@yahoo.com; hart2hart14@bellsouth.net; mcjbedwards@charter.net; sshackelford@hoover.k12.al.us
Cc: Litaker, Robin; Craig, Andy
Subject: Re: TC Information ...

As president of the PTO, I think the appropriate time for a meeting would have been BEFORE this information was given out. As things are now, my phone is blowing up and I look like a complete idiot because I have absolutely no idea what is going on at the school I represent to the Trace Crossings community. Even a phone call to discuss what a proper response to this situation would be, would have been extremely helpful. Where is Robin going???? For those of us who have stood by her, thick and thin and been her cheerleader in the community, we should know what is going on. I am certain you can tell by this email, I am extremely frustrated. It is as if a brick has just been thrown in a giant ant bed.
Kristi Tolbert

----- Original Message -----

From: Barber, Carol
To: tolberts4@charter.net ; pbbruner@gmail.com ; heglas@bellsouth.net ; kso@theowens.org ; leannperrycpa@charter.net ; jpopinski@graphicswearhouse.com ; clayandheather@bellsouth.net ; tadairward@gmail.com ; ericandsamantha@bellsouth.net ; t_dar_t@yahoo.com ; ransom224@yahoo.com ; hart2hart14@bellsouth.net ; mcjbedwards@charter.net ; sshackelford@hoover.k12.al.us
Sent: Friday, November 16, 2012 3:41 PM
Subject: TC Information

By now you have probably heard about planned changes for the administrative team at Trace Crossings Elementary. Beginning Monday, Nov. 26, I plan to assume the duties of principal for Trace Crossings. It is extremely unorthodox to make this type of change mid-year; however, when other district opportunities became available, Ms. Litaker requested the opportunity to take advantage of a change that interested her. When that request was approved, the opening at Trace Crossing became a call that I felt I could not ignore!

I am thrilled about the possibilities of working with the students, faculty, staff, and parents of Trace Crossings Elementary. For the past three years, as we have reviewed and analyzed programs for TC, I have worked closely with Ms. Litaker and other members of the TC faculty. To now have the opportunity to work full time with the staff at Trace is like living a dream! Words cannot communicate my excitement about working with the Trace Crossings family. The opportunity of being on a school campus working with teachers and kids on a day-to-day basis is eagerly anticipated!

Critical to my transition as principal at TC is communicating and meeting with parents, especially with members of the PTO. I know this is an extremely busy time of the year but do you see any possibility that I could meet with the PTO Executive Committee for a brief meeting during the week of Nov. 26? I can arrange my schedule to meet your desired meeting date/time. Just let me know if this is possible and if so, what works best for you.

I am enthusiastic about working together to further develop plans which will create the best possible learning environment for all our kids!

I hope you enjoy this upcoming week with your family. Have the best of all Thanksgiving holiday!

Carol Barber

Subject: FW: Voice Mail from Barber, Carol (36 seconds)

From: Litaker, Robin (rlitaker@hoover.k12.al.us)

To: robinlitaker@yahoo.com;

Date: Friday, September 6, 2013 6:53 AM

From: Microsoft Outlook on behalf of Barber, Carol

Sent: Tuesday, October 09, 2012 11:26 AM

To: Litaker, Robin

Subject: Voice Mail from Barber, Carol (36 seconds)

Voice Mail Preview:

Hey Robin this is Carol I just got into the office I wanted to let you know when your parents actually to your parents with the board meeting last night would you give me a call when you get a moment nothing bad they were really very very.

We have some concerns and I just wanted to give you a heads up on what that is.

But they were very complimentary FU in the board to the board but they just had some concerns that they want to bring forward as I said to the board so it's about 11:30 now could give me a call I'll talk to you know what's going on thanks bye bye.

Created by Microsoft Speech Technology. Learn More...

You received a voice mail from Barber, Carol at 1020

Caller-Id:	1020
Job Title:	Assistant Superintendent
Company:	Hoover City Schools
Work:	+1020
E-mail:	cbarber@hoover.k12.al.us
IM Address:	cbarber@hoover.local

**PLAINTIFF'S
EXHIBIT**

34

Subject: FW: Inforamtion

From: Litaker, Robin (rlitaker@hoover.k12.al.us)

To: robinlitaker@yahoo.com;

Date: Friday, May 31, 2013 11:22 PM

**PLAINTIFF'S
EXHIBIT**

38

From: Barber, Carol

Sent: Monday, November 19, 2012 3:00 PM

To: Trace Crossings Elementary Faculty and Staff

Subject: Inforamtion

Again, I express my excitement about joining the TC family. I am confident that together we can and will build a positive climate and a culture of excellence that parallels the very best of schools in the Hoover system! To do this, we will need to roll up our sleeves and commit to working together for the greater good of all our kids.

I shared that I have a family trip planned for this week. We planned to leave today (Monday) but due to some unplanned obstacles; we will not be leaving until Tuesday. I hate that I am out of town this week, but one guiding principle of my life has always been that family comes before job! I dare not cancel my trip; plus I really am anxious to see my daughter and son-in-law!

Just a few announcements to share with all of you.....

- I met with the PTO Board on Sunday afternoon to help them understand what is happening.
- A general meeting with parents is scheduled for Tuesday, Nov. 27 at 6:30 PM in the cafeteria. Amanda will be sending out a School Messenger message about this today.
- Please plan to meet as a faculty on Monday after school (about 2:50 PM in the library). Plan for this meeting to take about an hour.
- My current plan is for Amanda and I to visit classrooms on Monday to talk to the kids. We hope to be able to get around to each classroom throughout the day but not sure if that will/will not happen or if there will be enough time. If we don't make it to all on Monday; the visits will continue on Tuesday. We plan to begin with the 4th grade and work backwards to pre-school. I will plan a tentative schedule for the day, working around prep times. I apologize for the disruption this may cause to your daily schedule but I do want to meet the kids as soon as possible. I will send the tentative schedule to you later in the week.
- After meeting the kids, my main priority the week of Nov. 26 will be to visit classrooms and team meetings and to get to know the faculty and staff—individually and as a group!

Please do not be surprised if you see Ms. Litaker in our school during the upcoming weeks. Robin has agreed to meet with me to help me get my arms around current practices and procedures. I do not plan to make ANY changes during the up-coming weeks---all activities that were planned prior to Robin leaving will continue as planned. If for some reason a change should occur, you will be notified.

From talking with parents, I know the children will have questions about what happened to Ms. Litaker when they return on Nov. 26. Please use these points to guide our discussion with the kids.

- Ms. Litaker is taking a new job with the Hoover City Schools
- She will miss coming to TC each day and even more, will miss seeing all the students
- There will be times when she will come to Trace to visit; the students might even see her when she comes
- All the activities Ms. Litaker put in place at TC will continue—things like ringing the bell, etc.
- Mrs. Barber is going to take over as principal for TC and will be coming to rooms to visit sometime today or tomorrow; Mrs. Stone will continue to be the assistant principal at TC

For those of you who do not know me, you will quickly learn that I have high expectations—for myself, for the faculty and staff, and for the students. We have an extremely important charge—to provide the very BEST learning experience to every child who enters TC! This is an awesome responsibility and cannot be accomplished unless each of us faces our job with a commitment to excellence and a willingness to do whatever it takes to achieve that goal. Basically, I have one rule that I will expect to govern each of us as we begin this mission together—be where you are supposed to be at the appointed time and engage in those practices that distinguish you as a PROFESSIONAL!

While I am out of town, I hope to have access to email and if so, will try to keep up with any correspondences which are sent. If you need to contact me, my cell number is 470-1136.

I hope your Thanksgiving break is restful and relaxing and that you have the opportunity to spend meaningful time with your family! I hope you will join me in giving thanks for so many, many opportunities and advantages. We are so fortunate!

Carol

**PLAINTIFF'S
EXHIBIT**

36

**EVALUATION SUMMARY REPORT
PRINCIPAL SYSTEM**

Principal: Ms. Robin Litaker

SSN:

Date: January 13, 2011

School System: Hoover City Schools

School: Trace Crossings Elementary

Evaluator: Carol Barber

SSN:

1. Communication Knowledge and Skills

☐ 1 ☐ 2 ☒ 3 ☐ 4

(Sources: surveys, portfolio, interviews, observation)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Communicates with parents via school newsletters and emails. Publishes Week-At-A-Glance newsletter for faculty/staff. Meets regularly with Parent Teacher Organization. Meets one-on-one with teachers, parents, and students (strength of principal). Takes the time to listen to and respond to individual concerns. Acknowledges and encourage parent and teacher input. Demonstrates care and concern for individual students, teachers and parents.

2. Collaboration Processes and Skills

☐ 1 ☐ 2 ☐ 3 ☒ 4

(Sources: surveys, portfolio, interviews)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. As a first year principal, inherited a faculty/staff where culture, climate, and practices had to change. Began process of change by meeting with people—individually, in small groups, and in larger groups. Listened to people, identified areas where she would not allow any negotiations; identified areas where input was needed and encouraged. Planned transition activities to gain teacher and parent support. Established expectations and standards, yet building support and gaining teacher buy-in to new expectations and practices. Works hard to build on existing teacher strengths; acknowledges these strengths and delegates and empowers those to act. AP, currently in the school, applied for the principal position and was most upset with this did not occur. Filed an EEOC; district prevailed in the hiring of Ms. Litaker. Principal continues to work with this AP even though there appears to be a great deal of negative behavior involved. This skill area is an area of strength for Ms. Litaker!

3. Assessment/Masurement/Evaluation

☐ 1 ☐ 2 ☐ 3 ☒ 4

(Sources: surveys, portfolio, interviews)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Worked with Director of Elementary Education to analyze and share ARMT and SAT data with faculty (had not been done before). Arranged parent meetings to interpret test student and building scores for parents. Compared test scores to current student grades. Reading coach manages reading data for school. Notebooks contain grids identifying student achievement. Data is available to principal when observing in classrooms; during walk-throughs. Principal and reading coach and assistant principal can see level where any student is currently reading and how that student is progressing over time. Intervention plans for each struggling student are included in the notebook. Principal monitors lesson plans (available on the T drive). Curriculum is reviewed by teams and principal.

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4. Organizing for Results☐ 1 ☐ 2 ☒ 3 ☐ 4*(Sources: surveys, portfolio, interviews, observation)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal is trying to stay true to practices that have been established as Trace Crossings traditions until culture supports changes. Transition to curriculum teams is evolving. Mission of school will be analyzed and critiqued over the summer by parents and staff with the intent of revising for the 2011-2012 school year. Principal is moving slowly, helping the faculty to see the need for change, thereby embracing the changes as they are implemented.

5. Planning☐ 1 ☐ 2 ☐ 3 ☒ 4*(Sources: portfolio, interviews)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal is developing ownership of new ideas as they evolve. Principal encourages input into decisions for the schools. Principal is strategically planning for change, moving slowly and trying to take faculty and parents with her as changes are implemented. Principal is establishing goals and identifying activities to support school goals. Input for change is encouraged from faculty/staff, students, and parents. Principal is using data from a variety of sources to establish goals and objectives (assessment data, survey data, parent and staff meetings, etc.).

6. Federal/State/Local Laws and Policies☐ 1 ☐ 2 ☒ 3 ☐ 4*(Sources: surveys, portfolio, supervisor's review)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal applies laws and policies to everyday practice—supervision, discipline, school organization, etc. Evidence of understanding of laws and policies are represented in building procedures and practices. Principal is knowledgeable of laws applying to student rights and is not hesitant to call others for clarification when she is uncertain of a situation. Principal provides leadership in helping faculty, staff, students, and parents understand legal requirement of laws and policies.

7. Problem Solving☐ 1 ☐ 2 ☐ 3 ☒ 4*(Sources: surveys, portfolio, interviews)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal develops ownership of ideas by delegating, empowering others, and sharing. Input into solving problems is encouraged and acknowledged. Principal labels problems; brainstorm solutions with individuals/groups involved; develops ownership of solutions by allowing input into the solutions; shares data to help direct solutions; and builds consensus regarding the best solution for the problem. Principal has emphasized assessment data with faculty, helping teachers to understand profiles and to plan strategically for improvement.

8. Innovation
☐ 1 ☐ 2 ☒ 3 ☐ 4

(Sources: surveys, portfolio, observation)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal is significant reorganization in staffing patterns for 11-12 school year. Principal has initiated an innovative dismissal process with students: bus tickets (next year will add car pool tickets and walker tickets). PST meeting format—meeting times are selected by teachers; teams meet at different times based upon decision by team teachers. Principal has organized four theme days for students (health/safety; math/science, fine arts, social studies/history). Brings in speakers; develop activities for students around designated theme.

9. Technology Management
☐ 1 ☐ 2 ☒ 3 ☐ 4

(Sources: surveys, interviews, observation)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Models the use of technology on a daily basis. Communicates expectations to teachers about the use of technology tools to deliver instructional content. Professional development day was spent on inservices for I-Touches; teachers involved in geo-caching. Principal has purchased software program called FAST MATH to help student acquire mastery of basic math facts.

10. School Operations and Management
☐ 1 ☐ 2 ☐ 3 ☒ 4

(Sources: surveys, portfolio, observation)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal is analytical in assessment of building practices and procedures. This is an area of strength for Ms. Litaker. She understands how to effectively schedule personnel to achieve maximum efficiency; establishes routines to benefit students and faculty; and establishes rapport with student by creating a safe and secure learning environment (physically safe and emotionally safe)! Principal uses a critical eye to determine appearance of building and grounds and holds staff accountable for expressed expectations. Principal establishes high expectations and is willing to work with personnel as they change practices to meet changed expectations; however, will hold people accountable for agreed upon standards!

11. Fiscal Leadership and Management
☐ 1 ☐ 2 ☒ 3 ☐ 4

(Sources: surveys, portfolio, supervisor's review)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal meets regularly with bookkeeper to review POs, reconcile books, etc. Budget committee consists of elected teachers, counselor, bookkeeper, principal and parent. Budget committee determines spending of state funds, technology funds, etc. Principal works with PTO regarding spending of funds from parent organization.

12. Management of Professional Responsibilities
☐ 1 ☐ 2 ☐ 3 ☒ 4

(Sources: surveys, supervisor's review)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal is organized; completes tasks in a timely manner; is highly professional in making decisions related to staffing; responds to requests for information/assistance in positive manner. Delegates responsibility to appropriate personnel. Empowers appropriate personnel to demonstrate leadership regarding curriculum and instructional issues.

13. Leadership of Human Resources
☐ 1 ☐ 2 ☒ 3 ☐ 4

(Sources: surveys, portfolio, supervisor's review)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal has analyzed test data extensively and shared with parents and teachers. Principal has made sure teachers have specs for testing; planning to purchase Test Prep to help student prepare for SAT/ARMT. Principal has introduced Educate Alabama and the Quality Teaching Standards to faculty. Principals applies principles of effective supervision. Principals is involved in daily walk-throughs (goal is to get into every classroom every day)! As a new principal, Ms. Litaker is building a positive culture with parents, students and teachers. Change is beginning to evolve under her leadership. Principal constantly references mission and vision for TC and expects teachers to use this as a screen for making decisions.

Areas for Improvement: 1.

2.

Additional Comments:**Composite Knowledge/Skill Score**

Complete this box for all contract principals or for non-contract principals in school systems adopting a summative component.

For a principal to meet the approved "satisfactory" performance standards for the state evaluation model, the sum of the scores for knowledge/skill areas 1 through 13 must equal 36 or more. Scores of 33-35 are "unsatisfactory, but remediable" and scores less than 33 are "unsatisfactory"

Total of all knowledge/skill scores:

Principal has met the performance standard marked below:

☐

Satisfactory

☐

Unsatisfactory, but remediable

☐

Unsatisfactory



Principal Signature

/

Evaluator Signature

Principal's signature does not necessarily indicate agreement with the results of the evaluation.

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EVALUATION SUMMARY REPORT
PRINCIPAL SYSTEM

Principal: Mr. Robin Litaker

SSN:

Date: February 8, 2012

School System: Hoover City Schools

School: Trace Crossings Elementary School

Evaluator: Carol Barber

SSN:

1. Communication Knowledge and Skills

☐ 1☐ 2☒ 3☐ 4

(Sources: surveys, portfolio, interviews, observation)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Artifacts include weekly "WAG" (Week at a Glance) to faculty. Faculty meetings occur two times a month. Principal attends weekly team meetings. Team meetings have designated focus (math, reading, etc.). Communication to parents includes an article in monthly Trace Tribune. Principal holds "coffee with the principal" events for parents. Principal communicates "open door" policy for parents to "drop in." Principal is on car pool line every day; talks to parents in car pool line.

2. Collaboration Processes and Skills

☐ 1☐ 2☐ 3☒ 4

(Sources: surveys, portfolio, interviews)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal attends weekly team meetings. Principal encourages teachers to take leadership roles in school and community events. School is organized around teams—principal has assigned team chairpersons; holds regular meetings with team chairs; monitors curriculum via discussions with team chairs. Principal models collaboration and process skills to teachers and parents. Principal has partnered with Samford University to develop a collaborative partnership with Samford students providing targeted assistance with struggling student.

3. Assessment/Measurement/Evaluation

☐ 1☐ 2☒ 3☐ 4

(Sources: surveys, portfolio, interviews)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Individual student data is assembled for each student who has a demonstrated need in reading and math. Planning to assist at risk students in on-going. Data includes ARMT scores, SMI data, Hoover Math Assessments, LLL, F and Ps, etc. Reading and math coach assemble data on weekly basis and review with principal weekly.

4. Organizing for Results

☐ 1☐ 2☐ 3☒ 4

(Sources: surveys, portfolio, interviews, observation)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal is in 2nd year of principalship; has undertaken major shift in school culture; has created a new vision for school; holds people accountable for practices to support vision/mission. Principal has created additional planning opportunities for teachers, based upon results of survey data from teachers. Principal reviews survey data and responds with adjustments to organizational practices when possible. School has participate in a Total Quality Review Analysis and is using results from this process to design school improvement practices.

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5. Planning☐ 1 ☐ 2 ☐ 3 ☒ 4*(Sources: portfolio, interviews)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Building goals and objectives are clearly defined. Principal shares high expectations with faculty and staff. Principal encourages input from faculty/staff for improvement suggestions. Principal uses a variety of data sources to analyze and evaluate current practices and needs for changes.

6. Federal/State/Local Laws and Policies☐ 1 ☐ 2 ☒ 3 ☐ 4*(Sources: surveys, portfolio, supervisor's review)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal helps faculty and staff to understand laws and policies. Principal provides leadership in helping faculty, staff, students and parents understand legal requirements of school operations.

7. Problem Solving☐ 1 ☐ 2 ☒ 3 ☐ 4*(Sources: surveys, portfolio, interviews)*Comments, justifications, explanations:

Principal encourages and solicits input from teachers in identification of problems and suggestions for remedies to the problems. School is organized around teaming concept. Principal models involvement in "change" process. Principal encourages teachers to embrace new practices by providing professional learning opportunities through attendance at workshops, conferences, etc. Principal meets regularly with team chairs to share success stories and analyze areas of concern and identify solutions to problems.

8. Innovation☐ 1 ☐ 2 ☐ 3 ☒ 4*(Sources: surveys, portfolio, observation)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Principal is insightful in her vision for school and how to achieve the vision. School has embraced and teaming model for school operations. Common core curriculum has been rolled out early. Teachers are expected to share common practices for differentiation, assessment, etc. Principal has set the bar high for teacher expectations, is insistent that teachers also have opportunities to learn new practices. Mechanism to support and help teachers achieve outcomes are constantly being provided and evaluated.

9. Technology Management☐ 1 ☐ 2 ☒ 3 ☐ 4*(Sources: surveys, interviews, observation)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Technology team is charged with assisting teachers to integrate technology in teaching the content. Students and teachers are provided with multiple resources to promote the use of technology as a tool for promoting successful student learning. Trace Crossings provided the model for the district for the use of Google TVs as a tool for instructional improvement in schools. Science lab has become an integral component within the operation of the school.

10. School Operations and Management☐ 1 ☐ 2 ☐ 3 ☒ 4*(Sources: surveys, portfolio, observation)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Artifacts include a reorganized schedule which provides additional common planning time for teachers. Students know and follow daily routines. Principal instituted a bus ticket process for loading/unloading of buses. Luggage tags on bookbags identify if student goes to EDP, rides bus, goes to car pool or is a walker.

11. Fiscal Leadership and Management☐ 1 ☐ 2 ☐ 3 ☒ 4*(Sources: surveys, portfolio, supervisor's review)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 4. Reviews were conducted by the District Internal Auditor and the District Accounting Manager for the period from October 1, 2010 through May 31, 2011. No exceptions were noted. Ms. Lilaker and Mrs. Drake, bookkeeper for TC, are to be commended for the significant improvement in fiscal responsibility that has occurred at TC over the past two year.

12. Management of Professional Responsibilities☐ 1 ☐ 2 ☒ 3 ☐ 4*(Sources: surveys, supervisor's review)*Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal is punctual to work; has a phenomenal work ethic; submits reports and paperwork in a timely manner. Principal models professionalism when dealing with teachers, students, and parents. Principal is willing to hold people accountable even if it means she may experience some level of discomfort from staff/parents. Principal will tackle tough situations if it is in the best interests of students!

13. Leadership of Human Resources☐ 1☐ 2☒ 3☐ 4

(Sources: surveys, portfolio, supervisor's review)

Comments, justifications, explanations:

Lines of evidence related to this knowledge/skill area correspond most closely to score rationale level 3. Principal encourages examination of research based practices and provides opportunities for teachers to engage in a variety of professional learning activities. Principal and teachers are involved in using Educate Alabama. Principal is visible in classrooms—tries to make an appearance daily in each classroom. Principal expects teachers to make decisions based upon "what is in the best interests of the student" versus what is easiest for teacher or most convenient for staff!

Areas for Improvement: 1. Assessment, Measurement and Evaluation

2.

Additional Comments:

Composite Knowledge/Skill Score

Complete this box for all contract principals or for non-contract principals in school systems adopting a summative component.


For a principal to meet the approved "satisfactory" performance standards for the state evaluation model, the sum of the scores for knowledge/skill areas 1 through 13 must equal 36 or more. Scores of 33-35 are "unsatisfactory, but remediable" and scores less than 33 are "unsatisfactory"

Total of all knowledge/skill scores:

Principal has met the performance standard marked below:

☐ Satisfactory☐ Unsatisfactory, but remediable☐ Unsatisfactory

 Principal Signature


 Evaluator Signature

Principal's signature does not necessarily indicate agreement with the results of the evaluation.