

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS

SUPERIOR COURT
DOCKET NO. 219-2011-CV-00349

DAVID K. TAYLOR

v.

THE OYSTER RIVER COOPERATIVE SCHOOL BOARD
and
HENRY BRACKETT, Chairman

TO: Diane Gorrow, Esq.
Soule, Leslie, Kidder, Sayward & Loughman, PLLC
220 Main Street
Salem, NH 03079

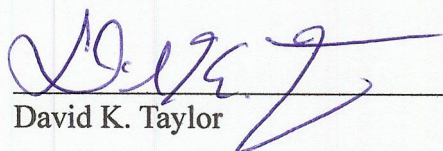
NOTICE TO TAKE ORAL DEPOSITION OF HENRY BRACKETT

PLEASE TAKE NOTICE that on Monday, August 22, 2011 at 9:30 a.m., at the offices of The Oyster River School District, 36 Coe Drive, Durham, New Hampshire, Plaintiff David Taylor, will take the deposition of Henry Brackett, by agreement and upon oral examination, before a Notary Public or before some other officer authorized to administer oaths. The oral deposition will be recorded stenographically and will continue from day to day until completed.

Mr. Brackett is requested to bring any documents or things responsive to Schedule A attached hereto.

You are invited to attend and cross-examine.

DATED at Durham, New Hampshire, this 17th day of August, 2011.



David K. Taylor

SCHEDULE A

As used in the list below, the terms "documents" or "records" shall mean the original, all copies, and drafts of writings of any kind, including without limiting the generality of the foregoing, correspondence, memoranda, statements, reports, notes, letters, messages (including reports, notes and memoranda or telephone conversations and conferences), contracts, records, calendar entries, data, agreements, checks and canceled checks, emails and any other designated documents, records, statements, or other writings and printed materials specifically referred to below.

1. For each of the meeting dates listed below, and any other times two or more Board members arranged to meet or actually met, please provide documents regarding their arrangement. If no documents exist, then please list each meeting with whatever detail is known and a statement of why there are no documents arranging it or why any such documents specifically cannot be released.

2. Since each meeting involved a quorum of the Board or a quorum of a subcommittee, any documents arranging them would have involved at least a series of communications involving a quorum of the Board or a quorum of the subcommittee. Given that, please provide any individual document related to the arrangements as part of that series.

3. Please provide any and all documents of meetings related to Superintendent Colter's "buyout" or hiring of an interim superintendent.

4. Please provide any and all documents related to the meetings for the "buyout" which focused on first the contract, schedule of fees, etc., for the lawyer and then second on the separation agreement itself.

5. The May 23rd meetings appear to have included a third party "public relations person", likely to help with Exhibit C of the separation agreement. Please provide any and all documents relating to this.

6. The meetings of the subcommittee at the Police Department focused on interviewing superintendent candidates with letters of introduction, requests to apply, lists of potential candidates, resumes, etc. Again, all of these were exchanged as part of the arrangements for these meetings. Please provide any and all documents relating to the above.

7. If any or all this work was done by phone, then please state that for each instance.

LISTED MEETINGS:

1. April 21 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
2. April 29 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
3. May 20 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
4. May 23 subcommittee at Hoefle, Phoenix, Gormley & Roberts, P.A.
5. May 23 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
6. June 6 Board/subcommittee at Police Department, Durham
7. June 10 subcommittee at Police Department, Durham

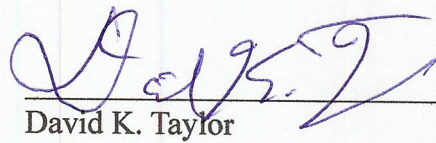
8. June 13 Board at Police Department, Durham
9. June 14 subcommittee at Police Department, Durham

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have served via **Certified U.S. Mail** upon:

Diane Gorrow, Esq., Soule, Leslie, Kidder, Sayward & Loughman, PLLC,
220 Main Street, Salem, NH 03079, the attached Notice to Take Oral Deposition
of Henry Brackett

this 17th day of August, 2011.



David K. Taylor