

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: Megan Turnbull  
c/o Dennis Ducharme, Esq.  
Wiggin & Nourie, P.A.  
P.O. Box 808  
Manchester, NH 03105-0808

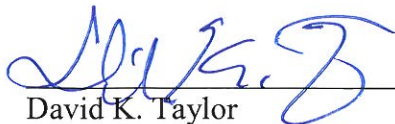
**NOTICE TO TAKE ORAL DEPOSITION OF MEGAN TURNBULL**

PLEASE TAKE NOTICE that on Friday, September 9, 2011 at 12:00 p.m., at the offices of The Oyster River School District, 36 Coe Drive, Durham, New Hampshire, Plaintiff David Taylor, will take the deposition of MEGAN TURNBULL, 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.

Ms. Turnbull 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 29th day of September, 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 of telephone conversations and conferences), contracts, records, calendar entries, data, agreements, checks and canceled checks, e-mails 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, for any meeting or non-meeting, please provide documents regarding their arrangement, including any documents prepared for or provided beforehand or as follow up. 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 or subordinate body, 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 or subordinate body. Given that, please provide any individual document related to the arrangements as part of that series and any other documents that are 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 23<sup>rd</sup> 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 or subordinate body at the Police Department focused on interviewing superintendent candidates with letters of introduction, requests to apply, lists of potential candidates, resumes, potential contracts or contractual terms, job descriptions, qualifications, 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. Please provide any and all documents of meetings, non-meetings, casual gatherings, or any instance where two or more Board members gathered or communicated related to the interview, selection of, or decision not to hire the Oyster River High School principal final candidate or candidates in the spring of 2011.

8. Please provide any and all documents related to the letter from the ORHS Senior Student Senate about graduation and any response in action or in writing to this letter by the Board or members of the Board.

9. Please provide any and all documents related to public relations or crisis management, press releases, public statements, letters on behalf of the Board, and the timing, planning, coordinating or implementing of public relations or crisis management.

10. Please provide any and all documents related to any relationships, arrangements, contracts, proposals, meetings or communications with Raymond Mitchell of Trident Communications Group, Rhoades Alderson of New Harbor Group, Arthur "Skip" Hanson of NESSC, and Duke Albanese of Great Schools partnership or anyone else at these organizations or any similar organization, consultants or contractors, whether paid or not.

11. Please provide any and all documents related to any formal or informal delegation or instructions, from the Board or members of the Board, to Board members or groups of Board members to perform tasks, including but not limited to gathering information, writing documents, contacting people or organizations, planning, meeting or arranging meetings, making recommendations or any other tasks.

12. Please provide any and all documents related to any communication with anyone not at a non-public session by any Board member or intermediary, concerning disclosure whether substantive or rumored of actual or possible reasons for non-public decisions, or efforts to initiate or spread rumors or information that could be damaging or disparaging to an employee, former employee, or potential or former candidate for employment by ORCSD.

13. Please provide any and all documents related to any activities, communications or discussions related to hiding, obscuring, making indirect arrangements, or in any way making it more difficult to understand something.

#### LISTED MEETINGS:

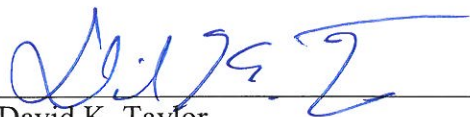
1. April 20 Board/subcommittee/subordinate body at Police Department, Durham
2. April 21 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
3. April 27 Board at ORHS before regular meeting
4. April 29 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
5. May 6 subcommittee/subordinate body at Durham Council Room
6. May 16 Board/subcommittee/subordinate body at Ann Lane's house
7. May 20 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
8. May 22 subcommittee/subordinate body conference call
9. May 23 subcommittee/subordinate body at Hoefle, Phoenix, Gormley & Roberts, P.A.
10. May 23 Board at Hoefle, Phoenix, Gormley & Roberts, P.A.
11. May 24 Board/subcommittee/subordinate body
12. May 27 subcommittee/subordinate body conference call
13. June 3 Board/subcommittee/subordinate body
14. June 6 subcommittee/subordinate body at Police Department, Durham
15. June 9 Board/subcommittee/subordinate body, probably by conference call
16. June 10 subcommittee/subordinate body at Police Department, Durham
17. June 13 subcommittee/subordinate body at Police Department, Durham
18. June 13 Board with Kim Memmesheimer
19. June 14 subcommittee/subordinate body at Police Department, Durham
20. June 21 subcommittee/subordinate body conference call
21. June 27 subcommittee/subordinate body at Jackson Landing
22. September 12 Board with Dennis Ducharme

**CERTIFICATE OF SERVICE**

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

Megan Turnbull, c/o Dennis Ducharme, Esq., Wiggin & Nourie, P.A.,  
P.O. Box 808, Manchester, NH 03105-0808 the attached Notice to Take Oral  
Deposition of Megan Turnbull.

this 29th day of September, 2011.

  
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David K. Taylor