

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS

SUPERIOR COURT

No. 219-2011-CV-000349

DAVID K. TAYLOR

v.

THE OYSTER RIVER COOPERATIVE SCHOOL BOARD

and

HENRY BRACKETT, Chairman

DAVID K. TAYLOR'S EXHIBIT LIST

NOW COMES David K. Taylor ("Taylor"), Plaintiff in the above-captioned matter and submits the following Exhibit List.

| <u>Taylor Exhibit No.</u> | <u>Description</u> |
|----------------------------------|--|
| 1. | <u>Full</u> May 5, 1999 ORCSD Board Policy BBAA - Individual Members. [Old #027] |
| 2. | <u>Full</u> November 18, 2009 ORCSD Board Policy BDB - School Board Officers. [Old #028] |
| 3. | <u>Full</u> November 18, 2009 ORCSD Board Policy BDG - Attorney. [Old #029] |
| 4. | <u>Full</u> October 17, 2007 ORCSD Board Policy BE - School Board Meetings. [Old #030] |
| 5. | <u>Full</u> March 24, 2010 Board Workshop Minutes. [Old #259 p. 23-24] |
| 6. | <u>Full</u> March 24, 2011 ORCSD Board Workshop Minutes. [Old #039] |
| 7. | <u>Full</u> April 12, 2011 5:02 p.m. email thread begun by Brackett forwarded for legal review August 10, 2011 6:44 p.m. from Brackett on "Fwd: Non-public meeting - CONFIDENTIAL". Released to Portalupi on August 12, 2011. [Old #202] |
| 8. | <u>Full</u> April 13, 2011 ORCSD Notice of School Board Special Meeting. [Old #047] |

9. Full April 13, 2011 ORCSD Board Special Meeting DRAFT Minutes. [Old #048]
10. Full May 13, 2011 Invoice from Hoefle, et al. to Brackett re "Termination of Howard Colter". [Old #002]
11. Full April 18, 2011 Brackett calendar from April 18, 2011 to April 24, 2011. Released August 22, 2011 at Deposition of Brackett. [Old #118]
12. Full April 19, 2011 11:18 p.m. email thread on "non-meeting -confidential" begun by Brackett forwarded for legal review June 22, 2011 5:46 a.m. from Wright. Released to Taylor on July 7, 2011. [Old #152]
13. Full June 3, 2011 Invoice from Hoefle, et al. to Brackett re "Termination of Howard Colter". [Old #005]
14. Full May 20, 2011 Letter from the ORHS Senior Class Senate to the Board on graduation. [Old #257]
15. Full May 20, 2011 9:21 p.m. email thread on "Contact Info." begun by Turnbull forwarded for legal review August 20, 2011 9:59 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #236]
16. Full May 21, 2011 9:02 a.m. email thread on "Discuss crisis management and PR assistance" begun by Turnbull forwarded for legal review October 5, 2011 4:34 p.m. from Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. Includes blind copies to other Board members. [Old #247]
17. Full May 21, 2011 9:02 a.m. email thread on "Discuss crisis management and PR assistance" begun by Turnbull forwarded for legal review October 5, 2011 4:40 p.m. from Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull.. [Old #253]
18. Full May 22, 2011 10:57 a.m. email thread on "Plan on conference call tonight at 8PM" begun by Turnbull forwarded for legal review October 5, 2011 4:35 p.m. from Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. [Old #248]

19. Full May 22, 2011 11:00 a.m. email thread on "Discuss crisis management and PR assistance" begun by Turnbull forwarded for legal review August 20, 2011 4:17 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #232]
20. Full May 23, 2011 9:15 a.m. email thread on "ATTORNEY CLIENT PRIVILEGE -- Meeting today with PR people" begun by Wright forwarded for legal review August 19, 2011 10:12 a.m. from Kim Memmesheimer. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #203]
21. Full May 24, 2011 11:53 a.m. email thread on "Draft Press Release - Attorney Client Privilege Document" begun by Turnbull forwarded for legal review August 20, 2011 4:16 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #231]
22. Full May 25, 2011 9:24 a.m. email thread on "Call with Rhoades on Friday" begun by Turnbull forwarded for legal review October 5, 2011 4:36 p.m. from Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. [Old #250]
23. Full May 26, 2011 5:05 a.m. email thread on "Today's meeting" begun by Brackett forwarded for legal review August 10, 2011 5:01 p.m. from Brackett. Released to Taylor on August 12, 2011. [Old #197]
24. Full May 26, 2011 2:32 p.m. email thread on "Call with Rhoades Alderson Tomorrow (Friday) at 2:30PM" begun by Turnbull forwarded for legal review October 5, 2011 4:36 p.m. from Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. [Old #249]
25. Full May 26, 2011 2:38 p.m. email thread on "Another note about tomorrow's call with Rhoades" begun by Turnbull forwarded for legal review August 20, 2011 4:12 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #226]

26. Full May 26, 2011 7:05 p.m. email thread on "Attorney-Client Privilege Information - Conference Call Billing" begun by Arthur "Skip" Hanson forwarded for legal review August 20, 2011 4:11 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. Release did not include attachment. [Old #224]
27. Full August 31, 2011 Response to August 25, 2011 Right-to-Know request on New Harbor Group invoices. [Old #109]
28. Full May 27, 2011 4:34 p.m. email thread on "Background info including letter from Oyster River Student Senate" begun by Turnbull forwarded for legal review August 20, 2011 4:08 p.m. Email from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #221]
29. Full May 29, 2011 10:49 p.m. email thread on "Draft letter responding to Oyster River Student Senate" begun by Turnbull forwarded for legal review October 5, 2011 4:39 p.m. from Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. Release did not include attachment. [Old #252]
30. Full May 31, 2011 10:36 a.m. email thread on "a request" begun by Brackett forwarded for legal review June 25, 2011 from Kach. Released to Taylor on August 19, 2011 for deposition of Brackett. [Old #168]
31. Full May 31, 2011 9:26 p.m. email thread on "FYI Interim Superintendent Position" begun by Brackett forwarded for legal review June 25, 2011 from Kach. Released to Taylor on August 19, 2011 for deposition of Brackett. [Old #167]
32. Full May 31, 2011 9:26 p.m. email thread on "Interim Superintendent Position" begun by Brackett. Released to Taylor on October 7, 2011 for deposition of Turnbull. [Old #138]
33. Full June 28, 2011 Invoice from Hoefle, et al. to Brackett re "Termination of Howard Colter". [Old #009]

34. Full June 2, 2011 7:47 a.m. email thread on "Letter to the Class of 2011 from the ORCSD School Board" begun by Turnbull forwarded for legal review August 20, 2011 4:01 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #217]
35. Full June 2, 2011 8:17 a.m. email thread on "Confidential - Suggestions for interim superintendent" begun by Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. [Old #136]
36. Full June 2, 2011 11:11 p.m. email thread on "Meeting on Monday" begun by Turnbull. Released to Taylor on October 7, 2011 for deposition of Turnbull. [Old #137]
37. Full June 3, 2011 9:40 a.m. email thread on "Meeting Location Confirmed" begun by Turnbull forwarded for legal review August 20, 2011 3:58 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #215]
38. Full June 6, 2011 3:39 p.m. email thread on "Numbers" begun by Arthur "Skip" Hanson forwarded for legal review August 20, 2011 3:57 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #214]
39. Full June 7, 2011 8:26 a.m. email thread on "Call to discuss upcoming announcements" begun by Turnbull forwarded for legal review August 20, 2011 3:54 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #213]
40. Full June 8, 2011 9:52 p.m. email thread on "Fwd:" begun by Wright forwarded for legal review August 20, 2011 3:51 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #209]
41. Full June 9, 2011 7:11 a.m. email thread on "Oyster River news today and help with delivering news" begun by Turnbull forwarded for legal review August 20, 2011 3:50 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #208]

42. Full June 12, 2011 7:21 a.m. email thread on "CONFIDENTIAL: Attorney-Client Privilege Information Fwd: The interim situation" begun by Wright forwarded for legal review June 22, 2011 5:41 a.m. from Wright. Released to Taylor on July 7, 2011. [Old #150]
43. Full June 12, 2011 4:10 p.m. email thread on "Cell phone FYI" begun by Brackett forwarded for legal review August 20, 2011 3:47 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #207]
44. Full June 12, 2011 4:34 p.m. email thread on "Interim Superintendent" begun by Brackett forwarded for legal review August 20, 2011 3:46 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #205]
45. Full June 12, 2011 8:47 p.m. email thread on "Guidence for Interim Superintendent" begun by Brackett forwarded for legal review August 20, 2011 3:45 p.m. from Brackett. Released to Taylor on August 22, 2011 for deposition of Brackett. [Old #204]
46. Full June 13, 2011 12:55 p.m. email thread on "Interim Superintendent" begun by Howard Colter forwarded for legal review June 22, 2011 5:39 a.m. from Wright. Released to JoAnn Portalupi on July 7, 2011. Redacted name is Lyonel Tracy. [Old #149]
47. Full June 13, 2011 3:04 p.m. email thread on "Interim supt best practices" begun by Butts forwarded for legal review June 24, 2011 5:00 p.m. from Butts. Released to Taylor on August 19, 2011 for deposition of Brackett. [Old #164]
48. Full June 14, 2011 4:47 p.m. email thread on "A motion tomorrow" begun by Wright forwarded for legal review August 10, 2011 11:04 a.m. from Brackett. Released to Taylor on August 12, 2011. [Old #191]
49. Full June 15, 2011 3:38 p.m. email thread on "additional press releases" begun by Wright forwarded for legal review June 28, 2011 11:10 a.m. from O'Quinn. Released to Taylor on August 19, 2011 for deposition of Brackett. [Old #170]
50. Full June 15, 2011 ORCSD Board Regular Meeting Minutes. [Old #062]

51. Full June 15, 2011 ORCSD Board Non-public Minutes without dollar amount.
[Old #060]
52. Full June 15, 2011 Confidential Settlement Agreement and Release between
Howard Colter and the Board. [Old #093]
53. Full June 16, 2011 1:45 p.m. email thread on “non public minutes” begun by
Wright forwarded for legal review June 24, 2011 8:51 a.m. from Butts. Released to Taylor on
August 19, 2011 for deposition of Brackett. [Old #159]
54. Full June 17, 2011 6:06 a.m. email thread on “What is going on?” begun by Wright
forwarded for legal review August 10, 2011 11:03 a.m. from Brackett. Released to Taylor on
August 12, 2011. [Old #189]
55. Full June 17, 2011 8:32 a.m. email thread on “Next steps with the press” begun by
Turnbull forwarded for legal review June 28, 2011 11:33 a.m. from O’Quinn. Released to
Taylor on August 19, 2011 for deposition of Brackett. [Old #172]
56. Full June 17, 2011 8:57 a.m. email thread on “Op/Ed and article today - further
guidance requested” begun by Turnbull. Released to Taylor on October 7, 2011 for
deposition of Turnbull. [Old #145]
57. Full June 17, 2011 12:15 p.m. email thread on “What is your availability on
Tuesday to talk to the communications specialist” begun by Turnbull forwarded for legal
review June 28, 2011 11:38 a.m. from O’Quinn. Released August 19, 2011 for deposition of
Brackett. [Old #175]
58. Full June 17, 2011 3:10 p.m. email thread on “Call Scheduled for 10AM Tuesday”
begun by Turnbull forwarded for legal review June 28, 2011 11:37 a.m. from O’Quinn.
Released August 19, 2011 for deposition of Brackett. [Old #173]

59. Full June 17, 2011 8:13 p.m. email thread on "Conference bridge for Tuesday's call" begun by Turnbull forwarded for legal review June 28, 2011 11:37 a.m. from O'Quinn. Released August 19, 2011 for deposition of Brackett. [Old #174]
60. Full June 21, 2011 4:03 p.m. email thread on "Please forward to the full board" begun by JoAnn Portalupi. Released to JoAnn Portalupi on July 7, 2011. [Old #147]
61. Full June 22, 2011 published ORCSD Board Non-public Minutes for June 15, 2011 nonpublic session with dollar amount. [Old #061]
62. Full June 22, 2011 4:33 p.m. email thread on "Buyout Cost Posted" begun by Taylor forwarded for legal review August 10, 2011 10:59 a.m. from Brackett. Released to Taylor on August 12, 2011. [Old #187]

Respectfully submitted,

David K. Taylor, *pro se*

Date: November 28, 2011

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Exhibit List has been forwarded this 28th day of November, 2011 to Dennis Ducharme, Esquire.

David K. Taylor, *pro se*