These interrogatories are propounded in accordance with Superior Court Rule 36. You must answer each question separately and fully in writing and under oath. You must return the original and one copy of your answers within thirty (30) days of the date you received them to the party or counsel who served them upon you. If you object to any question, you must note your objection and state the reason therefor. If you fail to return your answers within thirty (30) days, the party who served them upon you may inform the court, and the court shall make such orders as justice requires, including the entry of a conditional default against you.

### THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS

SUPERIOR COURT

NO. 219-2012-CV-000001

## DAVID K. TAYLOR

V.

#### THE OYSTER RIVER COOPERATIVE SCHOOL BOARD

# **INTERROGATORIES**

NOW COMES David K. Taylor ("Taylor"), a citizen of the town of Durham, New Hampshire, Petitioner in the above titled matter, and hereby propounds upon the Defendant, the Oyster River Cooperative School Board (the "Board"), a body corporate and politic, these interrogatories:

1. What are the specific starting dates and times, places, durations and names of other people in the room or within communication for each session when each Board member reviewed information on any candidate community member for the Superintendent Screening Committee and at which sessions did each Board member submit his or her selection? Please provide copies of any written or electronic documents that relate to this answer.

- 2. What are the details of each occasion when, with whom and under what circumstances each Board member decided on, considered, or narrowed down his or her selection of community member for the Superintendent Screening Committee?
- 3. Who did each Board member select for community member for the Superintendent Screening Committee?
- 4. For each Board member, did any other Board member in any way influence his or her selection for community member for the Superintendent Screening Committee? If so, please describe that influence in detail and provide copies of any written or electronic documents that relate to this answer.
- 5. What are the details, including but not limited to dates and times, participants and observers, manner and form, subjects and any agreements, understandings or follow up actions, of any communications prior to December 22, 2011 by any means between any Board members, directly or indirectly, concerning any names or other descriptions that could serve to identify or narrow down any possible or actual candidate community members or other members for the Superintendent Screening Committee? Please provide copies of any written or electronic documents that relate to this answer.
- 6. What are the details, including but not limited to dates and times,
  participants and observers, manner and form, subjects and any agreements,
  understandings or follow up actions, of any communications prior to

December 22, 2011 by any means between any Board members, directly or indirectly, concerning Yusi Wang Turell or Luci Gardner as possible or actual candidate community members for the Superintendent Screening Committee? Please provide copies of any written or electronic documents that relate to this answer.

- 7. Besides the published minutes of Board meetings, what are the details, including but not limited to dates and times, participants and observers, manner and form, subjects and any agreements, understandings or follow up actions, of any communications prior to December 22, 2011 by any means between any Board members, directly or indirectly, or between any Board members, administrators or consultants, concerning how any members for the Superintendent Screening Committee would be selected or nominated? Please provide copies of any written or electronic documents that relate to this answer.
- 8. What are the details, including but not limited to dates and times,
  participants and observers, manner and form, subjects and any agreements,
  understandings or follow up actions, of any communications prior to January
  21, 2012 by any means between any Board members, directly or indirectly, or
  between any Board members, administrators, consultants or Superintendent
  Screening Committee members, concerning any names or other descriptions
  that could serve to identify specifically any possible or actual candidates for

superintendent? Please provide copies of any written or electronic documents that relate to this answer.

- 9. What are the details, including but not limited to dates and times, participants and observers, manner and form, subjects and any agreements, understandings or follow up actions, of any communications prior to December 22, 2011 by any means between any Board members, directly or indirectly, or between any Board members, administrators or consultants, concerning the process approved by the voters at the February 8, 2011 district meeting to investigate the culture of distrust and disrespect in the school district? Please provide copies of any written or electronic documents that relate to this answer.
- 10. What are the details, including but not limited to dates and times, participants and observers, manner and form, subjects and any agreements, understandings or follow up actions, of any communications outside of a posted Board meeting after September 1, 2011 and prior to January 21, 2012 by any means between any Board members, directly or indirectly, or between any Board members and others, concerning in any way the superintendent position, including but not limited to selecting, recruiting, searching for, candidates for, replacement of, actual or potential candidates, etc.? Please provide copies of any written or electronic documents that relate to this answer.

11. Specifically when and in what manner were all the notices, agendas and minutes of any school board meetings involving the superintendent search posted, including to the district website, or made available to the public? Please provide copies of any written or electronic documents that relate to this answer.

Respectfully submitted,

Dated: January <u>23</u>, 2012

David K. Taylor, pro se

## **CERTIFICATION**

I hereby certify that a true and correct copy of the foregoing was this date forwarded to the Defendants.

David K. Taylor, pro se