

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.

ANSWER: The six Board members who reviewed the information in question did so privately at the Oyster River Cooperate School District office on December 19, 2011. All materials pertaining to the selection process and scheduling of times for review of those materials are attached hereto.

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?

ANSWER: On December 19, 2011, each Board member in question reviewed the letters of interest, wrote the name selected for consideration on a piece of paper, placed the piece of paper in an envelope, and gave the envelope to Superintendent Levesque's secretary, Wendy DiFruscio.

3. Who did each Board member select for community member for the Superintendent Screening Committee?

ANSWER: Board member Krista Butts did not participate in the process described above. The following designations were made:

Board Member	Candidate Selected
James Kach	Luci Gardner
Megan Turnbull	Yusi Wang Turell
Jocelyn O'Quinn	Yusi Wang Turell
Henry Brackett	Luci Gardner
Anne Lane	Henry Smith
Anne Wright	JoAnn Portalupi

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.

ANSWER: No.

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.

ANSWER: On December 5, 2011, during a special meeting, the process for selecting community members was discussed, and a motion was made by Anne Lane to the effect that members would review the interested candidates, discuss the candidates, have each Board member select a candidate and place the name in the hat, and then draw the names. That motion passed. (See December 5, 2011 meeting minutes)

Subsequent to that meeting, interim Superintendent Leon Levesque recommended a slightly different procedure as set forth in the attached December 13, 2011 memorandum. Mr. Levesque did so to avoid questions of impropriety which might arise if the Board members met privately to discuss the candidates. Subsequent to the issuance of Mr. Levesque's memorandum, the Board members completed the process as described in response to interrogatory answers 1-3 above.

At a regularly scheduled December 21, 2011 Board meeting the slips of paper submitted by the Board members who participated in the process were placed in a hat for a blind draw. Envelopes containing the name of Luci Gardner and Yusi Wang Turell were chosen. A motion to appoint those two individuals was made, seconded, and approved. (See December 21, 2011 meeting minutes)

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.

ANSWER: None not previously described in these answers.

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.

ANSWER: See attached emails.

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.

ANSWERS: Objection. The Board views the names of the Superintendent applicants who have not been publically discussed as finalists as private information that need not be disclosed.

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.

ANSWER: Objection. The interrogatory is not reasonably calculated to lead to the discovery of admissible evidence.

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.

ANSWER: Objection. The interrogatory is unintelligible.

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.

ANSWER: See attached documentation.

Respectfully submitted,

Dated: January _____, 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

I, Henry J. Brackett, Chair of The Oyster River School Board, Swear that the above answers are true to the best of my information and belief.

Henry J. Brackett

Henry J. Brackett

State of New Hampshire

Strafford County

This instrument was acknowledged before me on 1/31, 2012 by Henry J. Brackett

[Signature]
Justice of the Peace / ~~Notary Public~~

My commission expires: 9/5/12