

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

DREW ADAMS, et al.,

Plaintiff,

v.

THE SCHOOL BOARD OF ST. JOHNS
COUNTY, FLORIDA,

Defendant.

No. 3:17-cv-00739-TJC-JBT

PLAINTIFF'S FINAL EXHIBIT LIST

Plaintiff Drew Adams ("Drew"), by and through his next friend and mother, Erica Adams Kasper, hereby submits his final exhibit list pursuant to Rule 26(a)(3), Federal Rules of Civil Procedure. Drew makes his disclosures and reserves his right to amend, modify or otherwise supplement his disclosures as allowed under the Federal Rules of Civil Procedure.

PLAINTIFF'S FINAL EXHIBIT LIST

EXHIBIT NUMBER	BATES NUMBER	DESCRIPTION	OBJECTION
1	PLAINTIFF0002230	Grant, J., et al. (2014). <i>Injustice at Every Turn: A Report of the National Transgender Discrimination Survey.</i>	
2	PLAINTIFF0002457	James, S., et al. (2016). <i>The Report of the U.S. Transgender Survey.</i>	

EXHIBIT NUMBER	BATES NUMBER	DESCRIPTION	OBJECTION
3	PLAINTIFF0001117	Drew's driver's license	
4	PLAINTIFF0001118	Drew's birth certificate	
5	SJCSB-DA 002691	June 14, 2015 – Erica emails Holly Arkin to let her know that Drew is transitioning; forward to S. Smith and C. Mittelstadt	
6	SJCSB-DA 000525	September 22, 2015 – Erica emails Holly Arkin re conversation with Drew. “It seems that on the problems is that there are only two gender-neutral bathrooms on campus ...inconvenient on top of singling Drew out as a trans student...”	
7	PLAINTIFF0002921 – 2925	(Undated) Letter from Erica Adams Kasper to Superintendent Joyner re: school's instruction to Drew to begin using gender neutral restrooms	
8	SJCSB-DA PRR 000819-822	Oct. 2, 2015 Letter from Erica Adams Kasper to Principal Dresback re: school's instruction to Drew to begin using gender neutral restrooms	
9	SJCSB-DA 17065	October 12, 2015 – E. Kasper sending email following meeting S. Smith	
10	SJCSB-DA 010553	Nov. 30, 2015 – E. Kasper sending follow email to meeting with C. Mittelstadt and B. Asplen	
11	SJCSB-DA 005831-005832	Nov. 30, 2015 – Email from C. Mittelstadt to E. Kasper	

EXHIBIT NUMBER	BATES NUMBER	DESCRIPTION	OBJECTION
12	SJCSD-D.A. 000616-617	April 9, 2016 – Email from E. Kasper to C. Mittelstadt and H. Arkin regarding meeting	
13	KASPER000184-185	April 22, 2016 email from Erica Kasper to Roger Mills; subject “Drew Adams – update” regarding safety and privacy	
14	KASPER000186	A May 5, 2016 email from Erica to Roger Mills describing another problem with Drew accessing a boys’ restroom for AP testing that was occurring in the gymnasium area. Drew was required to use the coach’s restroom if he needed a restroom break.	
15	SJCSD-D.A. 000629	May 13, 2016 – E. Kasper emails C. Mittelstadt and Holly Arkin an article “US Directs Public Schools to Allow Transgender Access to Restrooms”	
16	SJCSD-D.A. 000641	May 16, 2016 – Email from E. Kasper to C. Mittelstadt asking to change Drew’s gender in the computer system	
17	SJCSD-D.A. 000657	May 22, 2016 and May 24, 2016 – Email from E. Kasper to C.M. and Holly Arkin sharing the American Federation of Teachers statement regarding Obama’s directives	
18	SJCSD-D.A. 000650	May 22, 2016 – Drew emailed various teachers to notify them that he is male and that he still has not	

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		been able to change his gender marker in the school system so the roster says he is female	
19	SJCSD-D.A. 000700; SJCSD-D.A. 000701; SJCSD-D.A. 000703; SJCSD-D.A. 000704; SJCSD-D.A. 000705	July 26, 2016 – Drew emailing teacher regarding transgender status because school roster has not been updated	
20	KASPER000202	Aug. 11, 2016 – Email from E. Kasper to R. Mills re “New Classes, New Locations”	
21	SJCSD-D.A. 000724	Aug. 27, 2016 – Email from E. Kasper to C. Mittelstadt and K. Dresback regarding bathroom access football game	
22	SJCSD-D.A. 000795, 16071	March 6, 2017 – Email to L. Kunze and K. Dresback from student and cc’d Drew	
23	SJCSD-D.A. 000813	March 28, 2017 – Email to L. Kunze re petition to address gender neutral bathroom in H pod	
24	SJCSD-D.A. 16070	April 6, 2017 – Email from A.Mander, Asst Principal at Nease to L. Kunze: request for trans students to use coaches bathroom in gym during AP testing	
25	PLAINTIFF0002932 - 2933	Nov. 6-7, 2017 email exchange with Principal Kunze re: Drew’s inability to access boys’ restrooms during the lunch hour when all students are required to remain in a restricted area with no	

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		gender neutral restrooms.	
26	PLAINTIFF0001330 - 1345	American Psychiatric Association, Diagnostic Criteria for Gender Dysphoria, <i>Diagnostic and Statistical Manual of Mental Disorders (DSM-5)</i>	
27	PLAINTIFF0001346 - 1347	America Psychiatric Association FAQ re: updating Gender Dysphoria diagnosis	
28	PLAINTIFF0001119 - 1238	World Professional Association for Transgender Health (2011). <i>Standards of Care for the Health of Transsexual, Transgender, and Gender Nonconforming People.</i>	
29	PLAINTIFF0001297 - 1329	American Psychological Association (2015). Guidelines for Psychological Practice with Transgender and Gender Nonconforming People. <i>Am. Psychologist</i> 70:832-864.	
30	PLAINTIFF0001239 - 1273	Hembree, W., et al. (2017). Endocrine Treatment of Gender-Dysphoric/Gender Incongruent Persons: An Endocrine Society Clinical Practice Guideline. <i>J. of Clin. Endocrinology & Metabolism</i> 102(11):1-35.	
31	PLAINTIFF0001274 - 1296	Hembree, W., et al. (2009). Endocrine Treatment of Transsexual Persons: An Endocrine Society Clinical Practice Guideline. <i>J. of Endocrinology & Metabolism</i> 94(9): 3132-	

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		3154.	
32	PLAINTIFF0001348 - 1349	American Academy of Family Physicians, <i>AAFP Reaffirms Antidiscrimination Policy with Vote on Transgender Equality</i> (Sept. 2016)	
33	PLAINTIFF0001350 - 1354	The American College of Obstetricians and Gynecologists. <i>Committee Op. No. 512: Health Care for Transgender Individuals</i> (Dec. 2011)	
34	PLAINTIFF0001355	American Medical Association (2017). <i>Access to Basic Human Services for Transgender Individuals H-65.964</i>	
35	PLAINTIFF0001356 - 1357	American Medical Association (2016). <i>Health Care Needs of Lesbian Gay Bisexual and Transgender Populations H-160.991</i>	
36	PLAINTIFF0001358	American Medical Association (2016). <i>Removing Financial Barriers to Care for Transgender Patients H-185.950</i>	
37	PLAINTIFF0001359	American Psychoanalytic Association (2012). <i>Position Statement on Attempts to Change Sexual Orientation, Gender Identity, or Gender Expression</i>	
38	PLAINTIFF0001360 - 1371	American Psychological Association & National Association of School Psychologists. (2015). <i>Resolution on gender and</i>	

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		<i>sexual orientation diversity in children and adolescents in schools.</i>	
39	PLAINTIFF0001372 - 1375	Anton, B. S. (2009). Proceedings of the American Psychological Association for the legislative year 2008: Minutes of the annual meeting of the Council of Representatives. <i>American Psychologist</i> , 64, 372–453.	
40	PLAINTIFF0001376 - 1389	Daniel, H. (2015). <i>Lesbian, Gay, Bisexual, and Transgender Health Disparities: Executive Summary of a Policy Position Paper From the American College of Physicians. Ann Intern Med.</i> 163:135-137	
41	PLAINTIFF0001390 - 1391	American Psychiatric Association (2012). <i>Position Statement on Discrimination Against Transgender and Gender Variant Individuals</i>	
42	PLAINTIFF0001392 - 1393	American Psychiatric Association (2012). <i>Position Statement on Access to Care for Transgender and Gender Variant Individuals</i>	
43	PLAINTIFF0001394 - 1395	Endocrine Society (2017). <i>Position Statement: Transgender Health</i>	
44	PLAINTIFF0001396 - 1401	Lopez, X., et al. (2017). Statement on gender-affirmative approach to care from the pediatric endocrine society special interest group on	

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		transgender health. <i>Curr. Op. Pediatr.</i> 29:475–480.	
45	PLAINTIFF0001402 - 1413	National Association of Social Workers. (May 2015). <i>Sexual Orientation Change Efforts (SOCE) and Conversion Therapy with Lesbians, Gay Men, Bisexuals, and Transgender Persons.</i>	
46	PLAINTIFF0001414 - 1422	National Association of Social Workers. (2011). Transgender and Gender Identity Issues. <i>Social Work Speaks.</i>	
47	PLAINTIFF0001423	Pediatric Endocrine Society (Mar. 2017). <i>PES Statement Promoting Safety of Transgender Youth.</i>	
48	EHRENSAFT001627 (Also: PLAINTIFF0001424 - 1499)	Substance Abuse and Mental Health Services Administration. (2015). <i>Ending Conversion Therapy: Supporting and Affirming LGBTQ Youth.</i>	
49	PLAINTIFF0001500 - 1516	American Academy of Pediatrics. (2013). Technical Report: Office-Based Care for Lesbian, Gay, Bisexual, Transgender, and Questioning Youth. <i>Pediatrics</i> 132(1):297-313.	
50	PLAINTIFF0001519 - 1524	American Academy of Pediatrics. (2013). Policy Statement: Office-Based Care for Lesbian, Gay, Bisexual, Transgender, and Questioning Youth. <i>Pediatrics</i> 132(1):198-203.	

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51	PLAINTIFF0001527 - 1529	World Medical Association. (2015). WMA Statement On Transgender People	
52	PLAINTIFF0003732 - 3734	American Association for Marriage and Family Therapy statement on "Gender Identity"	
53	PLAINTIFF0003735 - 3737	American Family Therapy Academy, "AFTA's Support for Transgender Persons"	
54	PLAINTIFF0003738 - 3739	American Family Therapy Academy, "Statement on Transgender Students"	
55	PLAINTIFF0003740 - 3741	American Academy of Child & Adolescent Psychology, "Transgender Youth in Juvenile Justice and other Correctional Systems"	
56	EHRENSAFT000229- 237	De Vries, Annelou L.C., et al. (2014). Young Adult Psychological Outcome After Puberty Suppression and Sex Reassignment. <i>Pediatrics</i> 134(4):696-704.	
57	EHRENSAFT000859 - 865	Olson, K., et al. (2016). Mental Health of transgender children who are supported in their identities. <i>Pediatrics</i> 137:1-8.	
58	EHRENSAFT000954 - 958	Travers, R., et al. (2012). Impacts of strong parental support for trans youth: a report prepared for Children's Aid Society of Toronto and Delisle Youth Services.	
59	PLAINTIFF0003742 -	Styne, D.M., et al. (2017).	

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	0003790	Pediatric Obesity— Assessment, Treatment, and Prevention: An Endocrine Society Clinical Practice Guideline. <i>J. of Clin. Endocrinology & Metabolism</i> 102(3):709–757.	
60	PLAINTIFF0003791 - 0003828	Open letter critiquing the <i>Sexuality and Gender</i> (McHugh/Mayer) article, dated March 22, 2017.	
61	PLAINTIFF0003829 - 0003838	Fuqua, J. (2013). Treatment and Outcomes of Precocious Puberty: An Update. <i>J. of Clin. Endocrinology & Metabolism</i> 98(6):2198–2207	
62	PLAINTIFF0002894	Flores, A.R. et al. <i>How Many Adults Identify As Transgender In The United States?</i> (June 2016). The Williams Institute.	
63	PLAINTIFF0001811 - 1812	Atherton High School, School-Based Decision Making Council Policy 500	
64	PLAINTIFF0001813 – 1837	U.S. Department of Education, <i>Examples of Policies and Emerging Practices for Supporting Transgender Students</i> (May 2016)	
65	PLAINTIFF0001563 - 1568	School Board of Broward County, Florida - Nondiscrimination Policy Statement (No. 4001.1)	
66	PLAINTIFF0001569 - 1669	Broward County Public Schools - Lesbian, Gay, Bisexual, Transgender, &	

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		Questioning Critical Support Guide (2d Ed., 2016).	
67	PLAINTIFF0001692 - 1694	Florida High School Athletic Association, "Who We Are"	
68	PLAINTIFF0001735 - 1810	Administrative Policies of the Florida High School Athletic Association, Inc. 2017-18 Edition	
69		Rule 34 Inspection video	Stipulated
70	SJCAB-DA 001368-1369	Email between T. Forson and F. Upchurch regarding best practices	
71	SJCAB-DA 1361	Jul 31, 2017 Letter from interested parent support the students	
72	SJCAB-DA 1326-27	Press release re LGBT bullies	
73	SJCAB-DA 1323	July 31, 2017 - We are nease email	
74	SJCSB-DA PRR 001897-1928	May 2015 - Materials related to conference in Ft. Lauderdale	
75	SJCSB-DA PRR 001543-1547	St. Johns County School Board policies	
76	SJCSB-DA PRR 001548-1551	Feb. 18, 2015 - minutes for LGBT Focus Group meeting	
77	SJCSB-DA PRR 1090-1097	March 3, 2015 email from S. Smith attaching recommendation and back-up information from LGBT Task Force	
78	SJCSB-DA PRR 001437-1526	Collection of non-discrimination policies from Florida school districts, and model policies for transgender	

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		students	
79	SJCSB-DA PRR 001789-1790	Summary of purpose and work of St. Johns County LGBT Task Force	
80	Pltf Exh. 9 – Asplen Depo	GLSEN model policy	
81	PLAINTIFF0003731	Aug. 1, 2017 Map Nease High School (restrooms marked in green and blue)	
82	SJCSB-DA PRR 823-827	Jan. 5, 2016 Email Dresback to Mittelstadt w Map of Nease High; Drew’s class schedule, and Best Practices	
83	SJCSB-DA 819-823	Oct. 2, 2015 Email from Erica to Dresback (fwd to Mittelstadt, to Upchurch) re Concern regarding Drew Adams – info for meeting Oct 9	
84	SJCSD-DA 000006-7	Jan. 15, 2016 Board response to OCR Complaint	
85	SJCSB-DA 001370-1374	Aug. 12, 2015 Email from Mittelstadt to Upchurch with Best Practices	
86	SJCSB-DA 001384-1393	Aug. 17, 2015 Email from Upchurch to Rob Sniffen with Best Practices	
87	SJCSB-DA 001397-1402	Aug. 18, 2015 Email from Upchurch to Strickland incorporating T. Harmon edits	
88	SJCSD-DA 000025-31	March 30, 2016 Upchurch position statement for School Board to OCR dated	
89	SJCSB-DA 000992	Aug. 12, 2016 Email from Mills to Upchurch asking supplemental questions	

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90	SJCSB-DA 1086-87	Sept. 7, 2016 Email from Upchurch to Mills in response	
91	SJCSB-DA 17097	September 9, 2015 – Sallyanne email to H. Arkin (and others): best practices to be distributed to principals tomorrow	
92	SJCSB-DA PRR 001567	Sept 10, 2015 – St. John’s County School District Assistant Principals’ Meeting Agenda	
93	SJCSB-DA 17090	September 28, 2015 – Email from Sallyanne Smith to Cathy Mittelstadt - In response to email from Erica re Drew	
94	SJCSB-DA 002685-86	September 28, 2015 Email C. Mittelstadt says she gave him information and they should discuss	
95	SJCSB-DA PRR 001051	Feb. 11, 2016 – Email from Roger Mills (OCR) to Superintendent Joyner	
96	SJCSB-DA PRR 001930	Human Rights Campaign “A Guide for Schools Responding to Questions About the US Department of Education’s Guidance on the Rights of Transgender Students.”	
97	SJCSB-DA PRR 001903	Gender Spectrum	
98	SJCSB-DA PRR 001592	Cover Letter with Task Force Recommendation	
99	SJCSB-DA PRR 001789-90	LGBTQ task force document	
100	SJCSB-DA PRR 001709-1721	Feb. 4-5, 2014 - Statewide LGBTQ – District Responses to the Legal and	

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		Ethical Rights and Needs of LGBTQ Students	
101	SJCSB-DA PRR 001483-496	March 3-5, 2014 – Stonewall Education Project Conference	
102	SJCSB-DA PRR 001773	Powerpoint	
103	SJCSB-DA PRR 001119- SJCSB-DA PRR 001122; SJCSB-DA PRR 001613	Nov. 5, 2014 – LGBTQ focus group met and gathered information to bring to task force minutes and agenda	
104	SJCSB-DA PRR 002430 - SJCSB-DA PRR 002532	Jan. 16, 2015 –JASMYN 2015 Teaching Respect For All Conference	
105	SJCSB-DA 001362-1365	Jan. 27, 2015 – Laura Barkett forwards email and attachments to Tim Forson, Brennan Asplen, Christina McKendrick and Sallyanne Smith	
106	SJCSB-D.A. 000151- SJCSB-D.A. 000152	Agenda and Notes from February 2015 Task Force Meeting	
107	SJCSB-DA PRR 001090-1097	March 3, 2015 – Email from S.A. Smith to B. Asplen and others re “recommendation and back up information from the last LGBTQ Task for Meeting and asked for comments	
108	SJCSB-DA PRR 001430 - 001436	Edits to recommendations from LGBTQ task force	
109	SJCSB-DA PRR 001968- 001995	Additional edits to recommendations from LGBTQ task force	
110	SJCSB-DA PRR 002479- 2494	2013 GLSEN National School Climate Survey	

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111	SJCSB-DA PRR 001570-77	Pages from Broward County Public Schools LGBTQ Critical Support Guide	
112	SJCSB-DA PRR 001783-86	Transgender and Gender Non-Conforming: Your Rights at School (April 2014)	
113	SJCSB-DA PRR 001454-SJCSB-DA PRR 001458	CA Safe Schools Coalition	
114	SJCSB-DA PRR 001457	Massachusetts Public Schools	
115	SJCSB-DA PRR 001473-SJCSB-DA PRR 001478	Jan. 22, 2013 –email from D.Pallazzo re San Francisco’s transgender policies from 2006 or 2003	
116	SJCSB-DA PRR 001489-1526	District of Columbia Public Schools – June 2015 – Transgender and Gender-Nonconforming Policy Guidance	
117	SJCSB-DA PRR 001624-25	May 19, 2016 – Email from De Pallazzo (Equality Florida) All Together Now Statewide Conference Call Minutes	
118	SJCSB-DA PRR 001095-96	March 3, 2015, Appendix B to the LGBTQ Task Force	
119	SJCSB-DA PRR 000160	Aug. 19, 2015 – Redlined Best practices	
120	SJCSB-DA PRR 001768 - 1770	Sept 9-10, [2015] –notes re LGBTQ guidelines meeting	
121	SJCSB-DA PRR 001584	District Response to the Needs of LGBTQ Students: Legal Rights and Ethical Responsibilities	

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122	PLAINTIFF0002929	Best Practices	
123	PLAINTIFF0001535 - 1556	Sept. 2014, <i>Medico-Legal Guidelines</i> , North Carolina Bar Association Medico-Legal Liaison Committee	
124	PLAINTIFF0001557 - 1559	Duke Department of Pediatrics, Duke University School of Medicine, Biography for Dr. Adkins	
125	PLAINTIFF0001531 - 1532	Nov. 19, 2017, HIPAA Privacy Authorization Form for Dr. Adkins	
126	PLAINTIFF0001533 - 1534	Nov. 19, 2017, HIPAA Privacy Authorization Form for Dr. Ehrensaft	
127	PLAINTIFF0003724 - 3729	Information for Informed Consent for Adolescents (originally signed June 19, 2016; updated Nov. 20, 2017)	
128	PLAINTIFF0003730	Informed consent signature page executed by Erica Adams Kasper and Scott Adams on May 31, 2016	
129	PLAINTIFF0003711	Meeting the Health Care Needs of LGBTQ Adolescents In the Primary Care Setting Powerpoint Presentation	
130	PLAINTIFF0003723	University of Louisville School of Medicine Child and Adolescent Sexuality Powerpoint Presentation	
131	PLAINTIFF0003710	Dept of Radiology: LGBT Identities, Clinical Concerns, Patient Communication Powerpoint Presentation	

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132	PLAINTIFF0000001	Feb. 26, 2016 letter from Michael De La Hunt, MD, FAPA	
133	PLAINTIFF0000002	Nov. 22, 2016 letter from Michael De La Hunt, MD, FAPA	
134	PLAINTIFF0000003 - 04	May 31, 2016 letter from Naomi J. Jacobs, Ph.D.	
135	PLAINTIFF0000005	May 25, 2017 Affidavit of Dr. Russell Sassani	
136		Articles cited in the attachments to Dr. Adkins' Expert and Rebuttal Reports	
137		Articles cited in the attachments to Dr. Ehrensaft's Expert and Rebuttal Reports	
138		Defendant's Response to Plaintiff's First Set of Requests for Admissions	
139		Defendant's Response to Plaintiff's First Set of Interrogatories	
140		All deposition transcripts and exhibits	
141		All exhibits necessary for rebuttal	
142		All impeachment exhibits	
143		Amended Complaint	
144		Answer to Amended Complaint	
145		Any Exhibits Listed by Defendant	

Dated: November 27, 2017

Respectfully submitted,

/s/ Tara L. Borelli

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CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2017, the foregoing document was filed electronically using the Court's ECF system, which will provide electronic notice to all counsel of record, including:

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