

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

**DREW ADAMS, a minor, by and through  
his next friend and mother, ERICA  
ADAMS KASPER,**

**Plaintiff,**

**v.**

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

**THE SCHOOL BOARD OF ST. JOHNS  
COUNTY, FLORIDA,**

**Defendant.**

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**DEFENDANT'S NOTICE OF FILING ITS SECOND AMENDED FINAL RULE  
26(a)(3) PRETRIAL DISCLOSURES**

**Amended to Omit Exhibit 60 and Add Exhibit 253 Only**

Defendant, the School Board of St. Johns County, Florida, pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, M.D. Fla. Loc. R. 3.06, and agreement of the parties, hereby gives notice of filing the following Rule 26(a)(3) pretrial disclosures:

**I. RULE 26(a)(3)(A)(i) and (ii): IDENTIFICATION OF WITNESSES**

**a. Witnesses Defendant Expects to Call**

1. James (Tim) Forson
2. Frank D. Upchurch, III, Esq.
3. Cathy Mittelstadt
4. Sallyanne Smith
5. Kyle Dresback
6. Lisa Kunze
7. Dr. Allan Josephson (Expert)
8. Dr. Paul Hruz (Expert)

**b. Witnesses Defendant May Call**

1. Drew Adams (live trial testimony and deposition testimony)
2. Erica Adams Kasper

3. Scott Adams
4. Brennan Asplen
5. Martha Mickler
6. Paul Rose
7. Records Custodian for St. Johns County School District
8. Records Custodian for medical providers

\* This list does not include potential impeachment witnesses.

**II. EXHIBITS**

No.	Date Identified	Date Admitted	Description	Bates No	Objection
1.			Authorization for Treatment by Dr. Naomi Jacobs (Def. Depo 1).	PLTF860-	
2.			History Form for Dr. Naomi Jacobs (Def. Depo 1).	PLTF861	
3.			Patient Rights and Responsibilities for Dr. Naomi Jacobs (Def. Depo 1).	PLTF862	
4.			Evaluation Report by Dr. Naomi Jacobs dated February 17, 2015 (Def. Depo 1).	PLTF863- PLTF864	
5.			Email dated April 24, 2015, from E. Adams to J. Johnson (Def. Depo 2).	SJCSD-DA 427	
6.			Baptist Health Parent Intake Questionnaire dated May 14, 2015 (Def. Depo 3).	PLTF189- PLTF190	
7.	DEC 12 2017 <i>sealed</i>	DEC 12 2017	St. Johns County School District Safety Plan dated May 14, 2015 (Def. Depo 4).	SJCSD-DA 51-52	
8.			Email dated May 18, 2015, from E. Adams to V. Golden (Def. Depo 5).	SJCSD DA 477-78	
9.			Client Intake Questionnaire for J. Asermely dated June 25, 2015 (Def. Depo 6).	PLTF 835- 836	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
10.			J. Asermely Session Notes for June 25, 2015 (Def. Depo 6).	PLTF837	
11.			Acknowledgment of Notice of Privacy Rights for J. Asermely dated June 25, 2015 (Def. Depo 6).	PLTF838	
12.			Letter from E. Adams to K. Dresback (Def. Depo 7).	SJCSD DA 14-16	
13.			Email from E. Adams to H. Arkin dated March 15, 2015 (Def. Depo 8).	SJCSD DA 603	
14.	DEC 11 2017	DEC 11 2017	Email from H. Arkin to E. Adams dated March 17, 2016 (Def. Depo 8).	SJCSD DA 604-606	
15.			Email chain between E. Adams and H. Arkin dated March 31, 2016 (Def. Depo 9).	SJCSD-DA 613	
16.			Email from E. Adams to C. Mittelstadt dated April 9, 2016 (Def. Depo 9).	SJCSD-DA 615-619	
17.			Email from C. Mittelstadt to E. Adams dated June 2, 2016 (Def. Depo 10).	SJCSD-DA 664	
18.			Letter from Dr. Naomi Jacobs to K. Russell dated May 31, 2016 (Def. Depo 11).	SJCSD-DA 3220-3221	
19.			Email from E. Adams to C. Mittelstadt dated June 6, 2016 (Def. Depo 12).	SJCSD-DA 665-666	
20. Sealed	DEC 12 2017	DEC 12 2017	Document from Dr. Naomi Jacob's records (Def. Depo 13).	SJCSD-DA 3222	
21.			Baptist Medical Survey dated March 13, 2017 (Def. Depo 14).	SJCSD-DA 3166	
22.			Letter from Dr. Naomi Jacobs to Dr. Sassani dated April 25, 2017 (Def. Depo 15).	SJCSD-DA 3226	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
23.			Article from Florida Times-Union dated June 13, 2016, entitled "Transgender Students Seek to Counter Opposition, Fears Over Bathrooms" (Def. Depo 16).		
24.			Email chain between A. Linsky, K. Dresback and Plaintiff dated September 25, 2015 (Def. Depo 17).	SJCSB-DA PRR 507-508	
25.			Email from L. Maalouf to Plaintiff dated November 1, 2016 (Def. Depo 18).	SJCSD-DA 742	
26.			Email from E. Adams to C. Mittelstadt and B. Asplen dated November 30, 2015.	SJCSB-DA PRR 579	
27.	DEC 12 2017	DEC 12 2017	Email from S. Smith to T. Forson dated September 23, 2014.	SJCSB-DA 17199	
28.	DEC 12 2017	DEC 12 2017	Email from S. Smith re Task Force members dated March 3, 2015 with attachment.	SJCSB-DA PRR 1090-1097	
29.			Letter from V. Hollis to Dr. J. Joyner dated December 28, 2015.	SJCSD-DA 001-003	
30.			Letter from Dr. Joyner to V. Hollis dated January 15, 2016.	SJCSD-DA 006-007	
31.			Map of Nease High School depicting gender designated and non-gender designated restrooms.	SJCSD-DA 909 and 919	
32.			Ninth grade class schedule for Plaintiff	SJCSD-DA 010	
33.	DEC 12 2017	DEC 12 2017	St. Johns County School District Guidelines for	SJCSD-DA 011-012	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
			LGBTQ students – Follow Best Practices (2015-16)		
34.	DEC 12 2017	DEC 12 2017	Email from E. Adams to H. Arkin dated September 23, 2015.	SJCSD-DA 013-016	
35.			Email from C. Mittelstadt to K. Dresback dated October 6, 2015.	SJCSD-DA 017 (DA 2665-68)	
36.	DEC 12 2017	DEC 12 2017	Email from E. Adams to S. Smith dated October 12, 2015.	SJCSD-DA 018	
37.			Email from S. Smith to E. Adams dated October 13, 2015.	SJCSD-DA 019	
38.			Email from E. Adams to S. Smith dated October 16, 2015.	SJCSD-DA 020	
39.	DEC 12 2017	DEC 12 2017	Email from C. Mittelstadt to E. Adams dated December 1, 2015.	SJCSD-DA 022	
40.			Letter from F. Upchurch to R. Mills dated March 30, 2016.	SJCSD-DA 025-032	
41.			Student Attendance Report for Plaintiff dated July 14, 2017.	SJCSD-DA 149-150	
42.			Course and Grade Information for Plaintiff from 2014-2017.	SJCSD-DA 036-038	
43.			Eleventh grade class schedule for Plaintiff.	SJCSD-Adams 905	
44.			1979 Building Plans for Nease High School: Bldgs C, F and G.	SJCSD-Adams 906	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
45.			1979 Building Plans for Nease High School: Bldg J.	SJCSD-Adams 907	
46.			1979 Building Plans for Nease High School: Bldgs K, L and O.	SJCSD-Adams 908	
47.			2008 Nease High School Floor Plan	SJCSD-Adams 909	
48.			2016 Nease High School Floor Plans – First Floor	SJCSD-Adams 910-913	
49.			2016 Nease High School Floor Plans – Second Floor	SJCSD-Adams 914-917	
50.			Architect's Notes re Nease High School.	SJCSD-Adams 918	
51.			8/12/15 e School Plus note re use of C-Pod bathroom	SJCSD-Adams 892	
52.			9/11/15 e School Plus note re use of male pronoun	SJCSD-Adams 893	
53.			8/15/16 e School plus note re GSA meeting issue	SJCSD-Adams 894	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
54.			8/16/16 e School plus note re "verbal attack"	SJCSD-Adams 895	
55.			12/14/16 e School plus note re rumors	SJCSD-Adams 896	
56.			8/16/16 Student Statement	SJCSD-Adams 897	
57.			Email from E. Adams to B. Blue dated January 25, 2016.	SJCSD-Adams 898-899	
58.			Statement by [student] about Plaintiff.	SJCSD-Adams 900	
59.			Statement by Plaintiff re incident with [student].	SJCSD-Adams 901	
60.			OMITTED		
61.			Student Information Sheet for Plaintiff (9 <sup>th</sup> grade)	SJCSD-Adams 903	
62.			Incident Report dated November 14, 2016.	SJCSD-Adams 904	
63.			E-School Plus Notes re Plaintiff	SJCSB-DA 920	
64.			H. Arkin encounters with Plaintiff	SJCSB-DA 921	
65.			Student Codes of Conduct for 2015-2018	SJCSB-DA 982-1231	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
66.	DEC 12 2017	DEC 12 2017	Emails from S. Smith to LGBTQ Task Force re various meetings in 2014-15	SJCSB-DA PRR 1098-1116	
67.	DEC 12 2017	DEC 12 2017	Agenda for LGBTQ Task Force Meeting dated February 18, 2015 (with handwritten notes).	SJCSD-DA 151-152	
68.	DEC 12 2017	DEC 12 2017	Minutes for LGBTQ Focus Group Meeting held February 18, 2015	SJCSB-DA PRR 1619-1622	
69.	DEC 12 2017	DEC 12 2017	LGBTQ Focus Group Meeting Agenda dated November 5, 2014.	SJCSB-DA PRR 1613	
70.	DEC 12 2017	DEC 12 2017	LGBTQ Focus Group Meeting Minutes dated November 5, 2014.	SJCSD-DA 153-156	
71.			Draft of LGBTQ Best Practices dated August 19, 2015.	SJCSD-DA 157-159, PRR 003-012, 1988, 1988-90, 1992-94, 2087	
72.	DEC 12 2017	DEC 12 2017	Email from C. Mittelstadt to F. Upchurch dated August 12, 2015, with draft of Best Practices.	SJCSD-DA 1377-1380	
73.			Email from S. Willets to V. Moody dated August 13, 2015.	SJCSB DA 3053-3054	
74.			Minutes from St. Johns County School Board Meeting on July 11, 2017.	SJCSB-DA PRR 192-198	
75.			Email chain between A. Linsky and Plaintiff dated July 17, 2017.	SJCSB-DA PRR 222-223	
76.			Email from Plaintiff to A. Linsky dated July 12, 2017.	SJCSB-DA PRR 225	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
77.			Email chain between A. Linsky and Plaintiff dated July 7 & 8, 2017.	SJCSB-DA PRR 226-227	
78.			Email chain between L. Kunze, J.A. and Plaintiff dated March 28 & April 2, 2017.	SJCSB-DA PRR 249	
79.			Email chain between Plaintiff K. Dresback, M. Fox dated March 6 & 7, 2017.	SJCSB-DA PRR 258	
80.			Emails re HOPE curriculum	SJCSB-DA PRR 261-83, DA 753-794	
81.			Emails re GSA	SJCSB-DA PRR 284-88, 371-76, DA 668-699, 749	
82.			Email chain between Plaintiff and H. Farson dated August 19, 2016.	SJCSB-DA PRR 341	
83.			Email chain between Plaintiff and K. Dresback dated September 25, 2015.	SJCSB DA PRR 389-90	
84.			U.S. Department of Justice Dear Colleague Letter dated May 13, 2016, on Transgender Students	SJCSB-DA PRR 1731-39	
85.	DEC 12 2017	DEC 12 2017	Policies and guidelines from other school districts re gender identity and transgender issues	SJCSB-DA PRR 1437-1526, 2533-2610	
86.			A.L.E.R.T. Guide for 2017-18 (includes Best Practices)	SJCSB-DA PRR 1559-1566	
87.	DEC 12 2017	DEC 12 2017	Principal and Asst. Principal Meetings where Best Practices implementation discussed	SJCSB-DA PRR 1567-69	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
88.			Docs re conferences attended by S. Smith and others re LGBTQ rights.	See SJCSB-DA PRR 1895-1928	
89.			Email from G. Freeman to S. Smith and others re LGBTQ Meeting Summary.	SJCSB-DA PRR 1605-1606	
90.	DEC 12 2017	DEC 12 2017	Minutes from Children's Behavioral Focus Group Meeting held October 8, 2014.	SJCSB-DA PRR 1610-1612	
91.			Email from D. Palazzo to various recipients dated May 19, 2016, with minutes of All Together Now Statewide Conference Call.	SJCSB-DA PRR 1623-1627	
92.			High School Feedback from 9/10 AP Meeting on LGBTQ Guidelines.	SJCSB-DA PRR 1768-1770	
93.			Agenda for Initial Meeting of LGBTQ Committee on September 19, 2014.	SJCSB-DA PRR 1771-1788	
94.			LGBTQ "Fact Sheet"	SJCSB-DA PRR 1789-1790	
95.			2014 email responses from other school districts re LGBTQ Critical Support Guide questions	SJCSB-DA PRR 1791-1810	
96.			Email chain between E. Adams and H. Arkin dated September 22, 2015.	SJCSD-DA 520	
97.			Email from E. Adams to H. Arkin dated October 27, 2015.	SJCSD-DA 548	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
98.			Email chain between E. Adams and C. Mittelstadt dated May 13, 2016.	SJCSD-DA 634-635	
99.			Email chain between E. Adams and C. Mittelstadt dated May 16, 2016.	SJCSD-DA 644	
100.			Email from C. Mittelstadt to E. Adams dated June 13, 2016.	SJCSD-DA 667	
101.			Email chain between E. Adams and L. Maalouf dated June 17 & 19, 2016.	SJCSD-DA 669-670	
102.			Email from E. Adams to H. Arkin dated August 13, 2016.	SJCSD-DA 714	
103.			Email from E. Adams to H. Arkin dated August 15, 2016.	SJCSD-DA 715	
104.			Email from E. Adams to H. Arkin dated August 23, 2016.	SJCSD-DA 723	
105.			Email from E. Adams to C. Mittelstadt dated August 27, 2016.	SJCSD-DA 724	
106.			Email chain between K. Dresback and E. Kasper dated August 29, 2016.	SJCSD-DA 733-735	
107.			Email from K. Dresback to Plaintiff dated February 22, 2017.	SJCSD-DA 784-785	
108.			Email chain between K. Dresback and Plaintiff dated February 22, 2017.	SJCSD-DA 799	
109.			Email chain between L. Kunze, Plaintiff and J.A. dated March 6 & 8, 2017.	SJCSD-DA 801	
110.			Letter from N. Jacobs to K. Russell dated May 31, 2016.	SJCSD-DA 3220-3221	
111.			Letter from Dr. Jacobs to Dr. Sassani dated April 25, 2017.	SJCSD-DA 3226-3227	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
112.			Medical records from Duke Health	SJCSB-DA 18024-18126	
113.			Medical records from Dr. Naomi Jacobs	SJCSB-DA 3197-3231	
114.			Medical records from Dr. Kamalesh Pai	SJCSB-DA 18323-18342	
115.			Medical records from Baptist Medical South	SJCSB-DA 18940-18986	
116.			Medical records from Baptist Pediatrics	SJCSB-DA 3154-3196	
117.			Medical records from Nemours Children's Clinic	SJCSB-DA 18169-18322	
118.			Medical records from Wolfson Children's Hospital	SJCSB-DA 18432-18939	
119.			Medical records from Take Shape Plastic Surgery	SJCSB-DA 18127-18168	
120.			Best Practices emails and drafts	SJCSB DA 1362-1416	
121.			Emails from citizens and parents re transgender restroom policy	SJCSB DA 1235-1361, 2470-2513	
122.			SJCSB Policy 2.16 Prohibiting Discrimination, Including Sexual and Other Forms of Harassment	SJCSB-DA PRR 2059-2062	
123.			Email from Plaintiff to D. Ousley dated April 28, 2015	SJCSD-DA 435	
124.			Email chain between E. Adams and C. Mittelstadt dated May 22 & 24, 2016.	SJCSD-DA 657	
125.			Email from Plaintiff to K. Bransford dated March 20, 2017.	SJCSD-DA 806-807	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
126.			Email from E. Adams to C. Mittelstadt dated May 28, 2016.	SJCSD-DA 2695	
127.			Email from H. Arkin to S. Smith dated June 15, 2015.	SJCSD-DA 2996	
128.			Undated letter from E. Adams to Dr. Joyner.	KASPER 39-43	
129.			Emails between E. Adams and Transactive Online representatives	KASPER 81-84	
130.			Emails between E. Adams and DOE OCR	KASPER 88-113, 180-247	
131.			SJCSD High School Student Progression Plan 2017-2018	SJCSB-DA 2218-2296	
132.			SJCSD Parent Resource Guide for 2017-18	SJCSB-DA 2092-2171	
133.	DEC 11 2017	DEC 11 2017	Video from School Bathroom Tour with Plaintiff and legal counsel	n/a	
134.			2014 Article from American Psychologist entitled "Expertise in Psychotherapy – An Elusive Goal?"	HRUZ 1635-1646	
135.			2010 Article from Association for Psychological	HRUZ 1588-1620	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
			Science entitled "Pitfalls and Opportunities in Nonverbal and Verbal Lie Detection"		
136.			2004 Article from Journal of Academy of Psychiatry Law entitled "A Cautionary Lesson from Simulated Patients"	HRUZ 1621-1622	
137.			2001 Article from Journal of American Academy of Psychiatry Law entitled "Commentary – Informed Consent in Psychotherapy – A Multidisciplinary Perspective"	HRUZ 1628-1634	
138.			2004 Research Report from American Psychological Society entitled "Psychological Responding During Script-Driven Imagery in People Reporting Abduction by Space Aliens"	HRUZ 1623-1627	
139.			1997 Article from American Journal of Psychiatry entitled "On Wearing Two Hates: Role Conflict in Serving as Both Psychotherapist and Expert Witness"	HRUZ 1579-1587	
140.			1997 APA Article entitled: Irreconcilable Conflict Between Therapeutic and Forensic Roles	HRUZ 1571-1578	
141.			WPATH Standards of Care for the Health of Transsexual,	Adkins Depo 3	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
			Transgender, and Gender Nonconforming People		
142. <i>sealed</i>	DEC 12 2017	DEC 12 2017	2010-11 St. Johns County School District Student Information/Entry Form dated July 30, 2010	SJCSD-DA 0053-0054	
143. <i>sealed</i>	DEC 12 2017	DEC 12 2017	SJCSD Home Language Survey dated August 2, 2010	SJCSD-DA 0055	
144. <i>sealed</i>	DEC 12 2017	DEC 12 2017	Florida Department of Health School Entry Health Exam dated July 29, 2010	SJCSD-DA 0069	
145. <i>sealed</i>	DEC 12 2017	DEC 12 2017	Plaintiff Birth Certificate issued December 18, 2000	SJCSD-DA 70	
146.			OMITTED		
147.			OMITTED		
148.			OMITTED		
149.			OMITTED		
150.			SJCSD Checklist for Gifted Characteristics dated November 25, 2013.	SJCSD-DA 141	
151.			SJCSD Checklist for Gifted Characteristics dated December 3, 2013	SJCSD-DA 142	
152.			Assessment by Hope Haven Children's Clinic and Family Center dated September 16, 2013.	SJCSD-DA 143-145	
153.			Discipline Narrative History dated November 12, 2013.	SJCSD-DA 148	
154.			SJCSD Student Record for Plaintiff	SJCSD-DA 033-44	
155.			February 2015 Council of School Attorneys Inquiry & Analysis re Title IX and Gender Identity Issues	SJCSD-DA PRR 013-023	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
156.			Article re Advocates or Employees: First Amendment Claims Brought by Special Ed Teachers	SJCSB-DA PRR 024-028	
157.	DEC 12 2017	DEC 12 2017	Broward County Public Schools LGBTQ Critical Support Guide Appendix F – Guide Summary	SJCSB-DA PRR 029-030	
158.	DEC 12 2017	DEC 12 2017	Broward County Public Schools LGBTQ Critical Support Guide Appendix G – Federal Support Letter dated June 14, 2011	SJCSB-DA PRR 031-033	
159.	DEC 12 2017	DEC 12 2017	Broward County Public Schools LGBTQ Critical Support Guide – The Necessity of the Guide	SJCSB-DA PRR 034-035	
160.	DEC 12 2017	DEC 12 2017	July 24, 2013 Department of Justice, Office of Public Affairs Press Release re Arcadia, California Agreement	SJCSB-DA PRR 036-037	
161.	DEC 12 2017	DEC 12 2017	October 2012 Fact Sheet from the National Women's Law Center re Title IX Protections	SJCSB-DA PRR 1531-33	
162.	DEC 12 2017	DEC 12 2017	Stonewall National Education Project Symposium Schedule for January 21, 2015 - Building Safe and Supportive Schools for LGBTQ Youth	SJCSB-DA PRR 1534-36	
163.	DEC 12 2017	DEC 12 2017	National Center for Transgender Equality April 2014 Outline re Rights at School	SJCSB-DA PRR 1539-42	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
164.			Draft of SJCSB Chapter 2.0 School Board Governance and Organization (Restroom Policy)	SJCSB-DA PRR 1543-1551, 2050-58	
165.			Broward County Public Schools Critical Support Guide - 2012		
166.			Recommendations from LGBTQ Task Force to Executive Cabinet dated February 2015	SJCSB-DA PRR 1552-58	
167.			Trends in Recent Case Law Regarding LGBTQ Students	SJCSB-DA PRR 1572-83	
168.	DEC 12 2017	DEC 12 2017	District Response to Needs of LGBTQ Students: Legal Rights and Ethical Responsibilities – Evaluation Summation	SJCSB-DA PRR 1584	
169.			Log of LGBTQ conferences attended in 2014-2017	SJCSB-DA PRR 1604	
170.	DEC 12 2017	DEC 12 2017	2014-15 FHSAA Handbook Excerpt re Gender Identity Participation	SJCSB-DA PRR 1607-08	
171.	DEC 12 2017	DEC 12 2017	2010- A Legal Handbook for LGBT Floridians and Their Families	SJCSB-DA PRR 1628-78	
172.	DEC 12 2017	DEC 12 2017	Stonewell National Education Project Release re 2014 Symposium on LGBT Youth	SJCSB-DA PRR 1681-85	
173.			Palm Beach County Safe Schools Handout re Ideas for Applying Strategic Language to Situations Involving Homophobic Remarks	SJCSB-DA PRR 1687-91	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
174.	DEC 12 2017	DEC 12 2017	2011 ASCA Article entitled "The Children Already Know"	SJCSB-DA PRR 1697	
175.			Sun Sentinel Article dated January 21, 2014, re Stonewall	SJCSB-DA PRR 1698-1700	
176.			Legally Speaking article entitled "Disciplining Students for Off-Campus Text Messaging/Social Networking"	SJCSB-DA PRR 1702-05	
177.	DEC 12 2017	DEC 12 2017	Brochure re Safe Schools of South Florida	SJCSB-DA PRR 1706-08	
178.	DEC 12 2017	DEC 12 2017	2014 Florida Statewide LGBTQ District Collaborative Conference Agenda	SJCSB-DA PRR 1709-13	
179.	DEC 12 2017	DEC 12 2017	2009 California Safe Schools Coalition Research Brief 9 – Understanding Differences Between Schools in Overall LGBT School Safety	SJCSB-DA PRR 1714-17	
180.			LRP Conference from October 27, 2016, re Transgender Students' Rights: Legal Issues and Practical Concerns for Your District	SJCSB-DA PRR 1722-30	
181.			Injunction Order from Texas v. US dated August 21, 2016	SJCSB-DA PRR 1740-61	
182.			Email chain between C. McKendrick and M. Sterling re LGBTQ training dated December 1, 2016	SJCSB-DA PRR 1762	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
183.			2016 FAQ from National School Boards Association re Addressing a Transgender Student	SJCSB-DA PRR 1763	
184.			Lambda Legal's "A Transgender Advocate's Guide to Updating and Amending School Records"	SJCSB-DA PRR 1764-67	
185.			Duval County Public Schools Youth Risk Behavior Surveys from 2013	SJCSB-DA PRR 1839-1871	
186.			Brochure entitled "I Think I Might Be Transgender, Now What Do I Do?"	SJCSB-DA PRR 1823-1838	
187.	DEC 12 2017	DEC 12 2017	The Daytona Beach News-Journal article dated June 8, 2011, "Flagler Schools Expand Policies on Bullying and Harassment."	SJCSB-DA PRR 1872	
188.	DEC 12 2017	DEC 12 2017	SJCSB Draft Policy 511.2 re Bullying and Harassment	SJCSB-DA PRR 1873-75	
189.	DEC 12 2017	DEC 12 2017	New York Department of Education Guidelines for Transgender Students	SJCSB-DA PRR 1876-78	
190.	DEC 12 2017	DEC 12 2017	Article re Gender Neutral Bathrooms: (Hopefully) Coming to a City Near You	SJCSB-DA PRR 1879-80	
191.	DEC 12 2017	DEC 12 2017	Brochure re Gender Spectrum Services – Training and Support	SJCSB-DA PRR 1881-94	
192.			Agenda, notes and other documents from May 13- 15, 2015 Stonewall Conference in Ft. Lauderdale	SJCSB-DA PRR 1895-1927	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
193.			A Guide for Schools Responding to Questions About U.S. DOE Guidance on Rights of Transgender Students	SJCSB-DA PRR 1929-33	
194.			Misc. Journal Articles re Transgender issues	SJCSB-DA PRR 1939-46	
195.			Fact Sheet: Transgender & Gender Nonconforming Youth in Schools by the Sylvia Law Project	SJCSB-DA PRR 1947-50	
196.			Schools in Transition: A Guide for Supporting Transgender Students in K-12 Schools	SJCSB-DA PRR 1951-62	
197.			October 2015 ASCA School Counselor article "Transgender and Gender Nonconforming Students: Advocate for Best Practices"	SJCSB-DA PRR 1963-66	
198.			2015 Abstract re G.G. v. Gloucester County School Board	SJCSB-DA PRR 1967	
199.			Draft Anti-discrimination Training Power Point re Gender Identity	SJCSB-DA PRR 1996-2001	
200.			Implementing Lessons that Matter – The Impact of LGBTQ-Inclusive Curriculum on Student Safety, Well-Being and Achievement	SJCSB-DA PRR 2002-2049	
201.			SJCSB Policy 5.02 re Non-Discriminatory Admission of Students	SJCSB-DA PRR 2059	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
202.			SJCSB Policy 511.2 re Bullying and Harassment	SJCSB-DA PRR 2070-72	
203.	DEC 12 2017	DEC 12 2017	U.S. Department of Health and Human Services web article re Stop Bullying and Creating a Safe Environment for LGBT Youth	SJCSB-DA PRR 2188-89, 2305-07	
204.	DEC 12 2017	DEC 12 2017	Misc. Research compiled and reviewed by District personnel prior to implementation of Best Practices	SJCSB-DA PRR 2114-2236	
205.			Lambda Legal Publication entitled "Out, Safe & Respected"	SJCSB-DA PRR 2208-2236	
206.			Lambda Legal Facts: Gays and Lesbian Youth in Schools	SJCSB-DA PRR 2204-07	
207.			9 Things to Know About Title IX	SJCSB-DA PRR 2201-03	
208.			MSNBC article dated April 30, 2014, entitled "Transgender Students Protected Under Title IX, DOE Says."	SJCSB-DA PRR 2199-2200	
209.			US DOE Know Your Rights: Title IX Requires Your School to Address Sexual Violence	SJCSB-DA PRR 2204-07	
210.			2014 Article re School Board Answers Transgender Students' Complaint re Gloucester High	SJCSB-DA PRR 2195-96	
211.			SJCSB Policy 4.06 re Student Clubs and Organizations	SJCSB-DA PRR 2193-94	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
212.			US DOE Questions and Answers on Title IX and Sexual Violence dated April 29, 2014	SJCSB-DA PRR 2135-2187	
213.	DEC 12 2017	DEC 12 2017	FHSAA January 2013 BOD Meeting Agenda Item re Proposed Gender Participation Policy	SJCSB-DA PRR 2237-39	
214.			US DOE Examples of Policies and Emerging Practices for Supporting Transgender Students – May 2016	SJCSB-DA PRR 2240-73	
215.			GLSEN 2011 National School Climate Survey Executive Summary	SJCSB-DA PRR 2292-2304	
216.			Abstracts of Safe Schools Improvement Act of 2013 and Student Non-Discrimination Act of 2013	SJCSB-DA PRR 2282	
217.	DEC 12 2017	DEC 12 2017	Misc. News Articles re Orange, Volusia and Escambia Counties development of transgender polices	SJCSB-DA PRR 2283-85	
218.			Misc. materials re Bullying in St. Johns County Schools	SJCSB-DA PRR 2308-11	
219.			San Francisco State University 2009 Publication re Helping Families with Lesbian, Gay, Bisexual and Transgender Children	SJCSB-DA PRR 2312-34	
220.			2012 Publication: An Ally's Guide to Issues Facing LGBT Americans	SJCSB-DA PRR 2335-49	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
221.			An Ally's Guide to Terminology: Talking About LGBT People and Equality	SJCSB-DA PRR 2350-59	
222.			Best Practices: A Teaching Tolerance Guide by the Southern Poverty Law Center	SJCSB-DA PRR 2360-63	
223.	DEC 12 2017	DEC 12 2017	Transgender Law Center - Transgender and Gender Non-conforming Youth – Recommendations for Schools	SJCSB-DA PRR 2364-69	
224.			Student Codes of Conduct from other Florida school districts re Bullying and Harassment	SJCSB-DA PRR 2370-2382	
225.	DEC 12 2017	DEC 12 2017	Buzzfeed Article re GG. v. Gloucester County School Board	SJCSB-DA PRR 2383-85	
226.			2012 NSBA publication re Respecting the Rights of Transgender Youths in the School System	SJCSB-DA PRR 2386-99	
227.			Toronto District School Board Guidelines for the Accommodation of Transgender and Gender Non-Conforming Students and Staff	SJCSB-DA PRR 2400-29	
228.	DEC 12 2017	DEC 12 2017	Misc. research and training materials re development and implementation of transgender policies.	SJCSB-DA PRR 2430-2532	
229.			Seminar Materials for "Transgender Students in K-12: Navigating	SJCSB-DA PRR 2611-13	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
			Accommodations and Avoiding Litigation”		
230.			Email chain between E. Kasper and L. Kunze dated November 7, 2017.	PLTF 2931-2933	
231.			Social Media Postings by Plaintiff, E. Adams Kasper and S. Adams provided in response to discovery requests.	PLTF2934-3671	
232.			Duke Children’s Hospital and Health Center Information for Informed Consent for Adolescents	PLTF 1097-1102	
233.			Treatment records from J. Asermely, LCSW, LCC	PLTF 835-838	
234.			Articles cited by Dr. Josephson in October 30, 2017, and November 3, 2017, Expert Reports	JOSEPHSON 001-522	
235.			Articles cited by Dr. Hruz in November 2, 2017, Expert Report	HRUZ 1-249, 250-1455	
236.			Article: “St. Johns County will continue to provide gender-neutral bathrooms” published May 18, 2016	SJCSB-DA 18992-18996	
237.			February 22, 2017, Dear Colleague letter issued by U.S. Departments of Justice and Education	SJCSB-DA 18989-18991	
238.	DEC 11 2017	DEC 11 2017	Plaintiff YouTube Video Titled, “MY DYSPHORIA”	PLAINTIFF 0001113	
239.			Plaintiff YouTube Video Titled, “Mental Health + Resources)	PLAINTIFF 0001112	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
240.			Plaintiff 4/11/17 Facebook Post re: Kroger Bathrooms	PLAINTIFF 0003012	
241.			Plaintiff 3/23/17 Facebook Post re: Gender Neutral-Bathrooms	PLAINTIFF 0003030	
242.			Plaintiff's 2/17/17 Facebook Post re: Medications	PLAINTIFF 0003074	
243.			Plaintiff's parent's Facebook Post w/ media	PLAINTIFF 0003140	
244.			Plaintiff 3/10/17 Facebook Post re: 3 <sup>rd</sup> bathroom	PLAINTIFF 0003288	
245.			Billing Records from Duke Health	Awaiting records	
246.			Article entitled "Transseksualiteit en Psychotherapie" (Dutch version)	Adkins Depo Exh 4	
247.			Article entitled "Transexuality and Psychotherapy" (English version)	Adkins Depo Exh 5	
248.			Attorney General Memorandum dated October 4, 2017	SJCSB-DA 18987-18988	
249.			(Proposed) Equality Act, 115 <sup>th</sup> Congress: Introduced as S 1006 and HR 2282	<a href="https://www.congress.gov/bill/115th-congress/senate-bill/1006/text?q=%7B%22search%22%3A%5B%22%5C%22Title+VII%5C%22+AND+%5C%22gender+identity%5">https://www.congress.gov/bill/115th-congress/senate-bill/1006/text?q=%7B%22search%22%3A%5B%22%5C%22Title+VII%5C%22+AND+%5C%22gender+identity%5</a>	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
				<p>C%22%22%5D%7D&amp;r=1</p> <p><a href="https://www.congress.gov/bill/115th-congress/house-bill/2282/text?q=%7B%22search%22%3A%5B%22%5C%22Title+VII%5C%22+AND+%5C%22gender+identity%5C%22%22%5D%7D&amp;r=2">https://www.congress.gov/bill/115th-congress/house-bill/2282/text?q=%7B%22search%22%3A%5B%22%5C%22Title+VII%5C%22+AND+%5C%22gender+identity%5C%22%22%5D%7D&amp;r=2</a></p>	
250.			(Proposed) Equality Act, 114 <sup>th</sup> Congress; S 1858 and HR 3185	<p><a href="https://www.congress.gov/bill/114th-congress/senate-bill/1858/text?q=%7B%22search%22%3A%5B%22114hr3185%22%5D%7D&amp;r=2">https://www.congress.gov/bill/114th-congress/senate-bill/1858/text?q=%7B%22search%22%3A%5B%22114hr3185%22%5D%7D&amp;r=2</a></p> <p><a href="https://www.congress.gov/bill/114th-congress/house-bill/3185/text?q=%7B%22search%22%3A%5B%22114hr3185%22%5D%7D&amp;r=2">https://www.congress.gov/bill/114th-congress/house-bill/3185/text?q=%7B%22search%22%3A%5B%22114hr3185%22%5D%7D&amp;r=2</a></p>	

No.	Date Identified	Date Admitted	Description	Bates No	Objection
				3A%5B%22114hr3185%22%5D%7D&r=3	
251.			(Proposed) Student Non-Discrimination Act of 2015, S439 and HR 846	<a href="https://www.congress.gov/bill/114th-congress/senate-bill/439/text?q=%7B%22search%22%3A%5B%22114s439%22%5D%7D&amp;r=1">https://www.congress.gov/bill/114th-congress/senate-bill/439/text?q=%7B%22search%22%3A%5B%22114s439%22%5D%7D&amp;r=1</a>  <a href="https://www.congress.gov/bill/114th-congress/house-bill/846/text?q=%7B%22search%22%3A%5B%22114s439%22%5D%7D&amp;r=2">https://www.congress.gov/bill/114th-congress/house-bill/846/text?q=%7B%22search%22%3A%5B%22114s439%22%5D%7D&amp;r=2</a>	
252.			All documents listed by Plaintiff in Plaintiff's Disclosures		
253.			Signed Statements from Individuals Regarding Separation of Bathrooms Based on Birth Gender	SJCSB-DA 18997-19020	

Dated this 29th day of November, 2017.

Respectfully submitted,

/s/ Terry J. Harmon

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 29th day of November, 2017, a true and correct copy of the foregoing was electronically filed in the U.S. District Court, Middle District of Florida, using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Terry J. Harmon

**TERRY J. HARMON**