

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

J.A.W.,)	
)	
Plaintiff,)	
)	
v.)	
)	Cause No. 3:18-cv-00037-TWP-MPB
EVANSVILLE VANDERBURGH SCHOOL)	
CORPORATION,)	
)	
Defendant.)	

DEFENDANT’S FINAL WITNESS AND EXHIBIT LISTS

The Defendant, Evansville Vanderburgh School Corporation, by counsel, submits its final witness and exhibit lists for the trial of this case:

I.

FINAL WITNESS LIST

1. Plaintiff. The plaintiff will be called to testify concerning the damages he claims to have suffered as a result of his inability to use the boys’ restrooms while a student at EVSC.
2. Tammy Work, plaintiff’s mother. Ms. Work will testify as to the damages suffered by plaintiff as a result of his inability to use the boys’ restrooms while a student at EVSC.
3. David B. Smith, EVSC Superintendent. Dr. Smith will testify as to the history of the plaintiff’s requests for access to the boys’ restrooms while a student at EVSC and EVSC’s response to those requests.
4. John Skinner, Principal at North High School. Mr. Skinner will testify concerning the history and timing of plaintiff’s requests for access to the boys’ restrooms while at North High School and the school’s response to those requests.

5. Jolayne Haller, EVSC Counselor at North High School. Ms. Haller will testify concerning the history and timing of plaintiff's requests for access to the boys' restrooms while at North High School and the school's response to those requests.

6. Michelle Donovan, EVSC Nurse at North High School. Ms. Donovan will testify concerning the availability of a gender-neutral restroom in the nurse's office at North High School and whether plaintiff or other students took advantage of that option.

7. Vikki Newman, EVSC Secretary at North High School. Ms. Newman will testify concerning the availability of a gender-neutral restroom in the nurse's office at North High School and whether Plaintiff or other students took advantage of that option.

8. Elizabeth Wells, Principal at Harrison High School. Ms. Wells will testify concerning whether and when plaintiff requested access to the boys' restrooms while at Harrison High School and the school's response to any such requests.

9. Chad Fetscher, teacher at Harrison High School. Mr. Fetscher will testify concerning whether and when plaintiff requested access to the boys' restrooms while at Harrison High School and the school's response to any such requests.

10. Heather Coy, teacher at Harrison High School. Ms. Coy will testify concerning whether and when plaintiff requested access to the boys' restrooms while at Harrison High School and the school's response to any such requests.

11. Megan Parker, EVSC Nurse at Harrison High School. Ms. Parker will testify concerning the availability of a gender-neutral restroom in the nurse's office at Harrison High School and whether Plaintiff or other students took advantage of that option.

12. Katy Elmer, EVSC Director of Student Supports. Ms. Elmer will testify concerning the history of plaintiff's requests for access to the boys' restrooms while a student at EVSC and EVSC's response to those requests.

13. Dionne Blue, EVSC Diversity Officer. Dr. Blue will testify concerning plaintiff's inquiry into EVSC's restroom policy and her response thereto.

14. Any and all persons on the plaintiff's final witness list.

15. Any and all persons necessary for impeachment or rebuttal or for the authentication of documents.

16. Plaintiff will be notified of any additional persons in a timely fashion as allowed by the Court.

II.

FINAL EXHIBIT LIST

1. Medical records from Within Sight.
2. Medical records from Echo Community Health Care.
3. Plaintiff's EVSC student records.
4. The deposition of David Smith of June 22, 2018, with exhibits.
5. The deposition of J.A.W. of June 21, 2018, with exhibits.
6. The transcript of the preliminary injunction hearing in this case.
7. Any and all exhibits on plaintiff's Final Exhibit List.
8. Any and all documents necessary for impeachment or rebuttal.
9. Plaintiff will be notified of any additional exhibits in a timely fashion as allowed by the Court.

Respectfully submitted,

s/ Patrick A. Shoulders

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**CERTIFICATE OF SERVICE AND
COMPLIANCE WITH ADMINISTRATIVE RULE 9(G)**

The undersigned hereby certifies that on this 3rd day of September, 2019, a copy of the foregoing was filed electronically with the Clerk of this Court. A copy will be served by the Court's electronic filing system upon:

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s/ Patrick A. Shoulders
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