

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

JENNIFER ELLER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 18-cv-03649-TDC/CBD
	)	
PRINCE GEORGE'S COUNTY	)	
PUBLIC SCHOOLS, ET AL.,	)	
	)	
Defendants.	)	
<hr style="border: 0.5px solid black;"/>		

**Joint Record**

Pursuant to the Court's Case Management Order, the parties hereby submit the Joint Record concerning Plaintiff's and Defendants' Motions for Summary Judgment (ECF Nos. 97 and 98). The Joint Record consists of Exhibits 1-60 which are Bates numbered J.R. 1–J.R. 916.

Exhibit Reference	Exhibit Names	Bates Range
1*	Jennifer Eller Deposition Transcript	J.R. 1-92
2*	Prince George's County Public Schools Discrimination or Harassment Incident Report dated February 13, 2015	J.R. 93-95
3*	EEOC Charge of Discrimination dated June 3, 2015	J.R. 96-98
4	EEOC Notice of Charge of Discrimination dated	J.R. 99-100
5*	Letter re: Discrimination or Harassment Incident Report dated June 25, 2015	J.R. 101-105
6*	EEOC Charge of Discrimination dated April 29, 2016	J.R. 106-107
7	EEOC Notice of Charge of Discrimination dated May 3, 2016	J.R. 108-109
8*	FMLA & LOA Approval Notice dated October 25, 2016	J.R. 110- 112
9	Plaintiff Jennifer Eller's Responses and Objections to Defendants' First Set of Interrogatories	J.R. 113-130

10*	Raynah Adams Deposition Transcript	J.R. 131-211
11*	Robin Pope Brown Deposition Transcript	J.R. 212-254
12*	Kevin Thompson Deposition Transcript	J.R. 255-303
13*	Courtney King Deposition Transcript	J.R. 304-337
14*	Jocelyn Isom Deposition Transcript	J.R. 338-390
15	Declaration of Jennifer Eller	J.R. 391-427
16*	Email from J. Eller dated May 17, 2011	J.R. 428-430
17*	Email from J. Eller dated August 13, 2012 (ELLER000124-127)	J.R. 431-435
18*	Email from J. Eller dated November 18, 2013 (ELLER000477)	J.R. 436-437
19*	Email from J. Eller dated August 21, 2012 (ELLER001067)	J.R. 438-439
20	Email from K. Thompson dated March 20, 2015	J.R. 440-441
21*	Email from J. Eller dated June 22, 2015	J.R. 442-443
22*	Email from J. Eller dated September 2, 2013 (ELLER001011)	J.R. 444-445
23*	Email from J. Eller dated October 7, 2015 (ELLER000271)	J.R. 446-447
24	Tumblr Post dated January 9, 2012 (ELLER001961)	J.R. 448-449
25*	Email from J. Eller dated August 30, 2011 (ELLER000101-102)	J.R. 450-452
26*	Email from J. Eller dated May 13, 2016	J.R. 453-454
27*	Email from J. Eller dated September 8, 2016	J.R. 455-457
28*	Email from J. Eller dated September 28, 2016	J.R. 458-459
29*	Email from J. Eller dated February 19, 2015 (ELLER000299)	J.R. 460-461
30*	Email from J. Eller dated October 14, 2013 (ELLER000145)	J.R. 462-463
31*	Email from J. Eller dated May 4, 2011	J.R. 464-465
32*	Email from J. Eller dated October 28, 2015	J.R. 466-468
33*	Email from J. Eller dated February 19, 2015 (ELLER000093)	J.R. 469-470
34*	Email from J. Eller dated February 19, 2015 (ELLER000093)	J.R. 471-472
35*	Marcellus R. Cephas, MD, Deposition Transcript	J.R. 473-538
36*	Expert Declaration of Dr. Randi C. Ettner	J.R. 539-612
37	Email from R. Adams dated January 7, 2015	J.R. 613-614
38	Amana Simmons 30(b)(6) Deposition Transcript	J.R. 615-688
39	Declaration of Irene A. Burks	J.R. 689-693
40	Declaration of Megan Weems	J.R. 694-697
41*	Declaration of Erin Reynolds	J.R. 698-704
42*	Email from J. Eller dated November 21, 2013 (ELLER000115-116)	J.R. 705-707

43*	Email from E. Davis dated December 18, 2013	J.R. 708-711
44	Email from R. Adams dated August 21, 2012	J.R. 712-713
45*	Email from J. Eller dated August 29, 2012	J.R. 714-715
46*	Defendant Prince George's County Public Schools' Responses to Plaintiff's First Set of Requests for Admission	J.R. 716-724
47	Prince George's County Public Schools Bd. of Educ. Policy No. 4185	J.R. 725-729
48*	J. Eller MedStar Health Medical Records (ELLER001284-313)	J.R. 730-760
49*	J. Eller Georgetown University Hospital Medical Records (ELLER1508-1516)	J.R. 761-771
50*	Email from J. Eller dated May 24, 2011	J.R. 772-774
51*	Defendant Prince George's County Public Schools' Responses to Plaintiff's Second Set of Requests for Admission	J.R. 775-784
52	Defendant Board of Education for Prince George's County's Responses to Plaintiff's First Set of Requests for Admission	J.R. 785-790
53*	EEOC Letter of Determination dated September 21, 2017	J.R. 791-793
54	U.S Department of Justice Notice of Right to Sue dated August 20, 2018	J.R. 794-795
55	Email from Teachscape Reflect Team dated December 5, 2014	J.R. 796-797
56	Prince George's County Public Schools Bd. of Educ. Policy No. 0125	J.R. 798-799
57*	Email from J. Eller dated August 13, 2012	J.R. 800-801
58*	Mark Fossett Deposition Transcript	J.R. 802-848
59	Email from M. Fossett dated September 23, 2015	J.R. 849-850
60*	Dr. Randi Ettner Deposition Transcript	J.R. 851-916

\*Exhibits marked with an asterisk are publicly filed with redactions. The full contents are filed under seal.

Respectfully submitted,

/s/ James E. McCollum, Jr.

James E. McCollum, Jr.  
Federal Bar No. 06448  
Amit K. Sharma  
Federal Bar No. 16660  
The McCollum Firm, LLC  
7309 Baltimore Avenue, Suite 117  
College Park, Maryland 20740  
Tel: (301) 864-6070  
Fax: (301) 864-4351  
jmccollum@jmlaw.net  
asharma@jmlaw.net

*Attorneys for Defendants*

/s/ Paul Pompeo

Thomas McSorley (No. 18609)  
Paul Pompeo\*  
Douglas Curtis\*  
Lori B. Leskin\*  
Elliott Mogul\*  
Rebecca Neubauer\*  
ARNOLD & PORTER  
KAYE SCHOLER LLP  
601 Massachusetts Ave., NW  
Washington, DC 20001-3743  
Telephone: +1 202.942.5000  
Fax: +1 202.942.5999  
Email: tom.mcsorley@arnoldporter.com  
paul.pompeo@arnoldporter.com  
douglas.curtis@arnoldporter.com  
lori.leskin@arnoldporter.com  
elliott.mogul@arnoldporter.com  
rebecca.neubauer@arnoldporter.com

Omar Gonzalez-Pagan\*

Carl Charles\*

LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.

120 Wall Street, 19th Floor

New York, NY 10005

Telephone: (212) 809-8585

Fax: (212) 809-0055

Email: [ogonzalez-pagan@lambdalegal.org](mailto:ogonzalez-pagan@lambdalegal.org)

[ccharles@lambdalegal.org](mailto:ccharles@lambdalegal.org)

*Attorneys for Plaintiff*

\* Admitted *pro hac vice*