

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

BETHEL MINISTRIES, INC.,)
)
)
Plaintiff,)
) Case No. 1:19-cv-01853-SAG
DR. KAREN B. SALMON, et al.)
)
)
Defendants.)
_____)

EXHIBIT LIST

EXHIBIT NO.

1. Transcript of Deposition of Claire Dant
2. Transcript of Deposition of Patricia Wecker
3. Plaintiff's First Amended Answers to Defendants' First Set of Interrogatories
4. 2018 Budget Bill, Chapter 150
5. Transcript of Deposition of Monica Kearns
6. Transcript of Deposition of James Klarman
7. Fiscal Years 2017–2020 Budget Bill Nondiscrimination Requirements
8. Gallagher statement on conflicting religious freedom and nondiscrimination requirements
9. Transcript of Deposition of Linda Eberhart
10. Transcript of Deposition of Beth Harbinson
11. Defendants' Responses to Plaintiff's First Set of Requests for Admission
12. Gunning email confirming no evidence of discriminatory behavior

EXHIBIT NO.

13. Emails between Posey-Moss and Kearns regarding Trinity Lutheran Christian School
14. Maryland PTA Statement to BOOST Advisory Board
15. Maryland PTA 2016 Legislative Agenda
16. Trinity Lutheran Christian School Handbook Excerpt
17. October 11, 2017 BOOST Advisory Board Meeting Minutes
18. Letters to Trinity Lutheran Christian School and Parents regarding expulsion from BOOST program
19. Transcript of Deposition of Felicia Wise
20. November 2017 Email from Kearns to Gallagher regarding start of handbook review
21. Emails between Dant and Gunning regarding sample revised handbook language
22. Transcript of Deposition of Matthew Gallagher
23. MSDE Letters to schools regarding handbook language
24. List of Category 3 schools under review as of April 2018
25. Examples of revised handbook language
26. April 2018 emails between Kearns and Gallagher regarding Category 3 schools
27. Transcript of Deposition of Elizabeth Green
28. Transcript of Deposition of A. Skipp Sanders
29. January 2018 Office of the Attorney General Memo
30. Kearns email regarding Category 3 schools and the addition of Broadfording Christian Academy
31. List of Category 3 schools as of March 2018
32. Klarman email to school forwarding January 2018 OAG Memo

EXHIBIT NO.

33. Kearns email to school forwarding January 2018 OAG Memo
34. Bethel Christian Academy 2017–18 Handbook
35. March 13, 2018 Letter from Dant to Kearns
36. Carpenter email summarizing Bethel and Woodstream decision timeline
37. Kearns email directing staff to keep May 1, 2018 OAG Memo confidential
38. Transcript of May 3, 2018 BOOST Advisory Board Meeting
39. Transcript of Deposition of Marva Jo Camp
40. May 25, 2018 Letter from Kearns to Dant
41. May 29, 2018 Letter from Dant to Kearns
42. June 21, 2018 BOOST Advisory Board Meeting Summary of Decisions
43. Transcript of June 21, 2018 BOOST Advisory Meeting
44. Letter to Bethel regarding expulsion from BOOST program
45. Letter to Bethel regarding clawback of BOOST scholarships
46. Letter to Bethel regarding handbook revisions and repayment options
47. Gallagher email discussing conversations with Baltimore Sun reporter
48. Eberhart email to Gallagher regarding editorial
49. Transcript of Deposition of Nancy Grasmick
50. Transcript of Deposition of Donna Gunning
51. Plaintiff's Amended Notice of Rule 30(b)(6) Deposition
52. Email inquiry regarding meaning of nondiscrimination language

EXHIBIT NO.

53. Bnos Yisroel email advising signing assurances with reservations
54. Klarman email stating Bethel's handbook was the only questionable one received
55. Flagged statements in Bethel's handbook
56. April 24, 2020 Letter from Gunning to Dant denying Bethel's application to the Aid for Nonpublic Schools program
57. Talmudical Academy of Baltimore School Conduct Policy and Behavioral Standards
58. 2017–2018 BOOST Scholarship Award Summary
59. 2018–2019 BOOST Scholarship Award Summary
60. Gallagher Tweet
61. Student Handbook of Yeshiva of Greater Washington
62. Bais HeMedrash & Mesivta of Baltimore Academic Catalog
63. Klarman email to Dant regarding BOOST review of handbook
64. Email to parent regarding ineligibility of chosen school to participate in BOOST
65. Krieger Schechter Day School Handbook