

21-1365

UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

Selina Soule, a minor by Bianca Stanescu, her mother, Chelsea Mitchell, a minor, by Christina Mitchell, her mother, Alanna Smith, a minor, by Cheryl Radachowsky, her mother, Ashley Nicoletti, a minor, by Jennifer Nicoletti, her mother,
Plaintiffs-Appellants,

v.

Connecticut Association of Schools, Inc, DBA Connecticut Interscholastic Athletic Conference, Bloomfield Public Schools Board of Education, Cromwell Public Schools Board of Education, Glastonbury Public Schools Board of Education, Canton Public Schools Board of Education, Danbury Public Schools Board of Education,
Defendants-Appellees,

and

Andraya Yearwood, Thania Edwards on behalf of her daughter T.M., and Commission on Human Rights and Opportunities,
Intervenor Defendants-Appellees.

On Appeal from the United States District Court
for the District of Connecticut, No. 3:20-cv-00201 (RNC)

DEFENDANT-APPELLEES'
JOINT SUPPLEMENTAL APPENDIX

Joshua Block
Lindsey Kaley
Galen Sherwin
ACLU Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2593
jblock@aclu.org

Elana Bildner
Dan Barrett
ACLU Foundation of Connecticut
765 Asylum Avenue
Hartford, CT 06105
(860) 471-8475
ebildner@acluct.org

*Counsel for Intervenor
Defendant-Appellees Andraya
Yearwood and Thania Edwards
on behalf of T.M.*

Linda L. Yoder
Peter J. Murphy
Shipman & Goodwin LLP
1 Constitution Plaza
Hartford, CT 06103
(860) 916-7156
lyoder@goodwin.com
pjmurphy@goodwin.com

*Counsel for Defendant-Appellees
Conn. Ass'n of Schools, Inc. and
Danbury Pub. Schools Bd. of
Educ.*

Michael Roberts
Connecticut Commission on
Human Rights and Opportunities
Suite 2, 450 Columbus Boulevard
Hartford, CT 06103
(860) 785-3145
Michael.E.Roberts@ct.gov

*Counsel for Intervenor Defendant-
Appellee Conn. Comm'n on Human
Rights and Opportunities*

David S. Monastersky
Howd & Ludorf, LLC
65 Wethersfield Avenue
Hartford, CT 06114
(860) 249-1361
dmonastersky@hl-law.com

*Counsel for Glastonbury Pub.
Schools Bd. of Educ. and Canton
Pub. Schools Bd. of Educ.*

Johanna Zelman
Ford Harrison LLP
Suite 610, City Place II
185 Asylum Street
Hartford, CT 06103
(860) 740-1361
jzelman@fordharrison.com

*Counsel for Bloomfield Pub.
Schools Bd. of Educ. and Cromwell
Pub. Schools Bd. of Educ.*

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

SELINA SOULE, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	No. 3:20-cv-00201-RNC
)	
CONNECTICUT ASSOCIATION OF)	
SCHOOLS, INC. <i>et al.</i> ,)	February 21, 2020
)	
<i>Defendants,</i>)	
)	
and)	
)	
ANDRAYA YEARWOOD and THANIA)	
EDWARDS on behalf of her daughter, T.M.,)	
)	
<i>Proposed Intervenors.</i>)	
)	

**MOTION OF ANDRAYA YEARWOOD AND THANIA EDWARDS,
ON BEHALF OF HER DAUGHTER, T.M.,
TO INTERVENE AS DEFENDANTS**

Andraya Yearwood (“Andraya”) and Thania Edwards on behalf of her daughter T.M. (“Terry”) move to intervene as defendants as of right pursuant to Fed. R. Civ. P. 24(a)(2) or, alternatively, for permissive intervention under Rule 24(b)(1). The basis for the Proposed Intervenor-Defendants’ motion to intervene is set forth below as well as in the accompanying declarations.

The central goal of Plaintiffs’ lawsuit is to prevent Andraya, Terry, and others girls who are transgender from participating in Connecticut athletics. Throughout their Complaint and Motion for Preliminary Injunction, Plaintiffs repeatedly refer to Andraya and Terry by name and single out Andraya and Terry as the source of Plaintiffs’ alleged irreparable injury. *See, e.g.*, Compl. ¶¶ 14-15, 76-77, 80-104, 130-37, 142, 145-46. Their Complaint is replete with factual

inaccuracies about Andraya and Terry personally, as well as about issues and policies that directly impact their lives. Andraya and Terry should not be forced to watch on the sidelines while Plaintiffs attempt to bar them from participating in the 2020 spring track and field season and expunge all record of their past accomplishments. The Court should therefore grant their motion to intervene either as of right, or, in the alternative, permissively.

BACKGROUND

Andraya and Terry

Andraya and Terry are track athletes in Connecticut who have spent the past four years participating in Track and Field in accordance with Connecticut law and state policy. Yearwood Decl. [Exhibit 1] ¶ 6; T.M. Decl. [Exhibit 2] ¶¶ 6, 10. Both Terry and Andraya are girls who are transgender, which means that they were assigned a male sex at birth but are young women. Yearwood Decl. ¶ 2; T.M. Decl. ¶ 3. Like non-transgender girls, Terry and Andraya have a female gender identity and live their lives as girls. Yearwood Decl. ¶¶ 2-3; T.M. Decl. ¶¶ 3-5. Andraya is an eighteen-year old student in her senior year at Cromwell High School. Yearwood Decl. ¶ 1. Terry is a seventeen-year old student in her senior year at Bloomfield High School. T.M. Decl. ¶ 1.

From the time she was a child, Andraya has known that she is a girl. Yearwood Decl. ¶ 2. In the summer before eighth grade, Andraya told her parents that she is transgender and started to receive social and medical support for her transition. *Id.* ¶ 2. By the time Andraya started high school, she was known to her family and peers as a girl and participated in all aspects of school consistent with her female gender. *Id.* She has legally changed her name to “Andraya” and has been undergoing hormone therapy for several years. *Id.* ¶ 3. As a result of her medical transition, Andraya’s circulating hormones are comparable to the hormone levels of non-transgender girls.

Id. In her everyday life and on her track team, Andraya is accepted as a girl by her family, her friends, her teammates, and her coaches. *Id.* ¶¶ 2, 6.

Terry also knew from a young age that she is a girl. T.M. Decl. ¶ 3. She recalls as far back as fifth grade being aware of her female gender but not yet having the language or support to understand what she needed in order to live authentically. *Id.* After years of repressing her identity, Terry came out as transgender in tenth grade and began to live all aspects of her life as a girl. *Id.* ¶ 4. She has since updated her Connecticut birth certificate to accurately reflect her sex as female and is undergoing hormone therapy. *Id.* ¶¶ 4-5. As a result of her hormone treatment, Terry has circulating hormones at levels typical of non-transgender girls and, like Andraya, is accepted as a girl by her family, her friends, her teammates, and her coaches. *Id.* ¶¶ 4, 11-12.

Andraya and Terry love to run, and they both participate in Indoor and Outdoor Track and Field on their respective girls' teams. Yearwood Decl. ¶¶ 4-7; T.M. Decl. ¶¶ 6-8. They participate in track for the same reasons as their non-transgender peers: being a part of a team creates lasting social and emotional relationships; through the training and competition they are able to invest physical and emotional energy and release stress and anxiety; and the experience gives them a place to be free to be themselves and thrive. Yearwood Decl. ¶¶ 4-7; T.M. Decl. ¶¶ 6-8. Like their teammates and other athletes in Connecticut and beyond, they value participation and not an expectation of winning. Yearwood Decl. ¶¶ 4, 11; T.M. Decl. ¶¶ 6, 14. During the season they each train multiple hours per day, five days per week, and push themselves and their teammates to improve. Yearwood Decl. ¶ 7; T.M. Decl. ¶ 7. "I am lucky to live in a state that protects my rights and to have a family that supports me," Andraya explained last year. "This is

what keeps me going. Every day I train hard—I work hard to succeed on the track, to support my teammates, and to make my community proud.”¹

Andraya and Terry have both excelled in track and field but, contrary to the allegations by Plaintiffs, their successes have been a result of hard work and are well within the range of high school track times for non-transgender girls. Indeed, some of the Plaintiffs in this case have placed ahead of one or both Andraya and Terry in the 55 meter, the 100 meter and the 300 meter events. Yearwood Decl. ¶ 11; T.M. Decl. ¶ 14. After the Complaint was filed, Plaintiff Chelsea Mitchell placed *first* in the 55 meter race at the Class S State Open in front of both Terry and Andraya. Yearwood Decl. ¶ 11; T.M. Decl. ¶ 14. *But see* Compl. ¶ 67 (asserting that the message sent to non-transgender girls under CIAC’s policy is “Give up. You can’t win.”).

CIAC’s policy

Under rules established by the Connecticut Interscholastic Athletic Conference (“CIAC”), which serves as the “sole governing body for inter-scholastic athletic activities in Connecticut,” Andraya, Terry, and other girls who are transgender participate on girls’ sports teams, and boys who are transgender participate on boys’ sports teams.² The current CIAC policy, which has been in effect since 2013, does not, as Plaintiffs allege, allow students to play on girls’ teams based on whether “they claim” to have a female gender identity. Compl. ¶ 2. The governing by-laws of the CIAC dictate student participation based on “the gender identification of that student in current school records and daily life activities in the school and community.”

¹ Dan Brechlin, *Connecticut high school transgender athletes ‘no longer want to remain silent’ following Title IX complaint*, Hartford Courant (June 20, 2019), <https://www.courant.com/sports/high-schools/hc-sp-transgender-policy-runners-respond-20190619-20190620-5x2c7s2f5jb6dnw2dwpftiw6ru-story.html>.

² Connecticut Interscholastic Athletic Conference, “About CIAC”, http://ciacsports.com/site/?page_id=13.

CIAC, 2019-2020 Handbook: CIAC By-Law, Article IX, Section B at 55 (2019-20). The student's school must verify that the "expression of the student's gender identity is bona fide and not for the purpose of gaining an unfair advantage in competitive athletics." *Id.* The policy restricts participation to the athletic classification of the student's lived and consistently expressed gender identity and bars participation in athletics of both genders. *Id.*

The CIAC's policy is not unusual. Across the country, the overwhelming majority of high school athletic associations have policies allowing boys and girls who are transgender to play on the same teams as other boys and girls. Athletic associations in eighteen states have policies that—like the CIAC's—allow transgender students to participate without requiring students to establish any proof of medical transition. In an additional eighteen states, the athletic associations allow transgender students to participate without hormone therapy or other medical transition on a case-by-case basis. Other states allow transgender students to participate after beginning hormone therapy. *See* CIAC, Reference Guide for Transgender Policy, https://www.casciac.org/pdfs/Principal_Transgender_Discussion_Quick_Reference_Guide.pdf. Based on the athletic policies that exist in almost every state, Terry and Andraya would be eligible to participate in the girls' category either based on their female gender identity, their updated birth certificate, and/or their hormone levels.

Transgender men and women also continue to participate in competitive athletics at every stage of their careers, and no post-secondary or elite athletic body regulates competition based on chromosomes, the relief requested by Plaintiffs. Compl. Prayer for Relief (C). The National College Athletic Association (NCAA) and the International Olympic Committee allow women

who are transgender to compete on women's teams after a period of undergoing hormone therapy.³

Plaintiffs' allegations

In their Complaint and Motion for Preliminary Injunction, Plaintiffs make a series of misleading and inaccurate assertions about Terry and Andraya, the CIAC policy, and Plaintiffs' alleged injuries, which Terry and Andraya strongly dispute.

Plaintiffs misleadingly allege that CIAC changed its policy "at some time before 2017." Compl. ¶ 70. In fact, CIAC adopted its policy four years earlier, in 2013. *See* CIAC, *CIAC Statement on Transgender Policy Change* (Feb. 20, 2020), <http://ciacsports.com/site/?p=14124>. For seven years, transgender athletes in Connecticut have been participating in interscholastic athletics consistent with their gender identity. During those seven years—in which tens of thousands of student athletes have competed on single sex teams—Plaintiffs have not identified any support for their claims that "the problem of [girls and women who are transgender] taking opportunities from [non-transgender girls and women] has grown very rapidly," Compl. ¶ 61, that "increasing numbers of [girls who are transgender] are in fact competing in girls' and women's events each year," *id.* ¶ 62, or that non-transgender girls "will simply vanish from the victory podium and national rankings," *id.* ¶ 63.

³ *See* NCAA Office of Inclusion, *NCAA Inclusion of Transgender Student-Athletes* (August 2011) at 13 https://www.ncaa.org/sites/default/files/Transgender_Handbook_2011_Final.pdf (permitting men who are transgender to participate on men's teams with no medical intervention and women who are transgender to participate on women's teams after one year of hormone therapy); International Olympic Committee, *IOC Consensus Meeting on Sex Reassignment and Hyperandrogenism* (November 2015), https://stillmed.olympic.org/Documents/Commissions_PDFfiles/Medical_commission/2015-11_ioc_consensus_meeting_on_sex_reassignment_and_hyperandrogenism-en.pdf (permitting men who are transgender to compete in the men's category with no medical intervention and women who are transgender to compete in the women's category upon proof of suppressed testosterone for a period of 12 months).

Plaintiffs also allege that Terry and Andraya “abruptly appeared” in girls’ track competition. Compl. ¶¶ 76, 87. Neither Andraya nor Terry “abruptly” began competing in girls’ track. Rather, both girls spent long periods of their lives coming to terms with their gender, coming out to their friends and family, and then transitioning at school. Yearwood Decl. ¶ 2; T.M. Decl. ¶¶ 3-4. Only then did they begin to compete on girls’ teams consistent with the recommendation of medical providers and CIAC policy. Yearwood Decl. ¶ 6; T.M. Decl. ¶ 10.

Throughout their Complaint, Plaintiffs also refer to Andraya and Terry as “biological males” but offer no consistent definition of “biological male.” There are many biological components of sex, including chromosomal, anatomical, hormonal, and reproductive elements. These elements do not always align within an individual as typically male or typically female, either because that individual has intersex traits or because that individual has undergone medical care for gender dysphoria. For these reasons, the Endocrine Society has said “the terms ‘biological sex’ and ‘biological male or female’ are imprecise and should be avoided.” See *Grimm v. Gloucester Cty. Sch. Bd.*, 302 F. Supp. 3d 730, 743 (E.D. Va. 2018). Plaintiffs appear to equate “biological sex” with chromosomes, Compl. ¶¶ 4, 67, 101, but all of their alleged “inescapable biological facts,” *id.* ¶ 47, are the result of hormones—not chromosomes.

For example, Plaintiffs focus on alleged athletic advantages resulting from “male puberty,” but as a result of puberty blockers and hormone therapy, many transgender girls go through a typically female puberty, and many transgender boys go through a typically male puberty. A girl who is transgender and who has XY chromosomes undergoing puberty blocking treatment, therefore, would have none of alleged advantages of “male puberty” that Plaintiffs attribute to “biological males.” Even if a girl who is transgender begins puberty based on her sex assigned at birth, there is no evidence to support the assumption that girls who are transgender

and who receive hormone therapy retain any of the alleged advantages identified by Plaintiffs as being outside the range of performance for non-transgender girls. *See* NCAA Inclusion of Transgender Student-Athletes at 7.

Referring to Andraya and Terry as “males,” Plaintiffs claim that “if males compete in girls’ events after puberty, equally gifted and dedicated female athletes simply can’t win.” Compl. ¶ 60. But neither Terry nor Andraya is undefeated and neither have dominant race times among high school girls nationally. Plaintiffs list the best 2019 Outdoor times for the 100m for girls, *see id.* ¶ 54, and the best times listed for Terry and Andraya do not come close to the best times registered for the presumably non-transgender girls on that list, *see id.* ¶¶ 80, 86, 89. Thus, based on the allegations in the Complaint alone, it is demonstrably untrue that a non-transgender female athlete “can’t win” in a race with a transgender athlete. Indeed, two days after filing the complaint, Plaintiff Chelsea Mitchell beat *both* Terry and Andraya in the 55 meter race and beat Terry in the 300 meter race at the Connecticut State Championship for Class S for the 2020 Indoor Track & Field season. T.M. Decl. ¶14; Yearwood Decl. ¶ 11.

In their Complaint, Plaintiffs also claim that their alleged deprivation of participation at championship meets cost them “the visibility necessary to attract the attention of college recruiters and resulting scholarships.” Compl. ¶ 103. But Plaintiffs make no allegations that college recruitment and the resulting scholarships are linked to participation in certain meets or tied to a threshold of media coverage, as opposed to result times alone. All track and field race times are publicly available and college recruiters can assess a runner’s skill, consistency, and improvement through high school based solely on result times. T.M. Decl. ¶ 16.

ARGUMENT

I. Andraya and Terry Are Entitled To Intervene As of Right

“To intervene as of right, a movant must: (1) timely file an application, (2) show an interest in the action, (3) demonstrate that the interest may be impaired by the disposition of the action, and (4) show that the interest is not protected adequately by the parties to the action.”

Brennan v. N.Y.C. Bd. of Educ., 260 F.3d 123, 128–29 (2d Cir. 2001) (internal quotation marks omitted). *See* Fed. R. Civ. P. 24(a)(2). Andraya and Terry satisfy every element of this test.

A. Andraya and Terry’s Motion Is Timely.

Andraya and Terry’s motion to intervene is timely because it has been filed only nine days after Plaintiffs’ complaint, and before any responsive pleadings have been filed by Defendants. *See Tyson v. Alvarez*, No. 17-cv-731, 2018 WL 5961425, at *1 (D. Conn. Nov. 14, 2018) (holding that motion to intervene was timely where “one defendant has not yet been served” and “discovery has only recently commenced”); *Privacy Matters v. United States Dep’t of Educ.*, No. 16-CV-3015 (WMW/LIB), 2016 WL 6436658, at *3 (D. Minn. Oct. 27, 2016) (same where “Defendants have not yet answered Plaintiffs’ complaint, no scheduling order has been issued, and discovery has not begun”); Wright & Miller, 7C Fed. Prac. & Proc. Civ. § 1916 (3d ed. 2002) (explaining that “an application made before the existing parties have joined issue in the pleadings has been regarded as clearly timely”).

B. Andraya and Terry Have a Protectable Legal Interest that Could Be Impaired By Disposition of This Action.

Andraya and Terry have a protectable legal interest in being able to compete in the spring track and field season and in protecting records of their past accomplishments. “For an interest to be cognizable by Rule 24(a)(2), it must be direct, substantial, and legally protectable.”

Bridgeport Guardians, Inc. v. Delmonte, 602 F.3d 469, 473 (2d Cir. 2010) (internal quotation

marks omitted). In this case, Plaintiffs' lawsuit poses a direct and substantial threat to Andraya and Terry's interests, which are protected under Connecticut law, Title IX, and the Equal Protection Clause. The relief that Plaintiffs seek is an injunction prohibiting Andraya and Terry from competing in the spring season of track and field and expunging Andraya and Terry from the records of any previous track-and-field season in which they competed.

In similar situations, district courts have routinely held that transgender students have a legally protectable interest when non-transgender students challenge policies at their school protecting them from discrimination. *See Meriwether v. Trustees of Shawnee State Univ.*, No. 1:18-CV-753, 2019 WL 2052110, at *9 (S.D. Ohio May 9, 2019) (granting intervention to transgender student who "established a specific and direct interest in the subject matter of this litigation, which involves [her school's] Non-discrimination Policy and its application and enforcement for the protection of transgender students"); *Privacy Matters*, 2016 WL 6436658, at *3 (holding that Jane Doe, a transgender student, had standing to intervene because "Plaintiffs seek preliminary and permanent injunctive relief that would require Doe's school to prohibit Doe from using the school restrooms and locker rooms that align with her gender identity" and explaining that "if Plaintiffs prevail on the merits, she will suffer an injury because her school will immediately stop providing her with equal treatment as required under Title IX, 20 U.S.C. §§ 1681, *et seq.*, and the Equal Protection Clause of the United States Constitution"); *Bd. of Educ. of the Highland Local Sch. Dist. v. U.S. Dep't of Educ.*, No. 2:16-CV-524, 2016 WL 4269080, at *4 (S.D. Ohio Aug. 15, 2016) (holding that Jane Doe, a transgender student, had substantial interest allowing her to intervene in lawsuit seeking to exclude her from using the girls' restrooms).

The Second Circuit's decisions in *Bridgeport Guardians*, 602 F.3d at 473, and *Brennan*, 260 F.3d at 129, are instructive. In both cases, white male employees were allowed to intervene as defendants in employment discrimination cases brought against their employers. The intervening white male employees argued that granting relief to the original plaintiffs, who alleged discrimination against women and racial minorities, would adversely affect intervenors' own employment status and seniority rights. The Second Circuit held that the white male employees could intervene because their legal interests were "the mirror image" of the claims asserted by the original plaintiffs. *Brennan*, 260 F.3d at 130. The white male employees had a right to intervene because the central issue in the case was "whether the remedy [requested by the original plaintiffs] restores circumstances that would have existed but for discrimination or is itself discrimination [against the intervenors]." *Id.* at 130-31; *see Bridgeport Guardians*, 602 F.3d at 474.

The same is true here. Plaintiffs have alleged that allowing Andraya and Terry to play on the same track and field team as other girls violates Plaintiffs' rights under Title IX. Andraya and Terry's defenses are "the mirror image" of those claims. Granting Plaintiffs' requested injunctive relief and banning Andraya and Terry would not remedy any legally cognizable discrimination against Plaintiffs, but would instead constitute unlawful discrimination against Andraya and Terry. *See, e.g., Whitaker v. Kenosha Unified Sch. Dist. No. 1 Bd. of Educ.*, 858 F.3d 1034, 1051 (7th Cir. 2017) (treating boy who is transgender differently than other boys in the context of single-sex restroom access violates Title IX); *Grimm v. Gloucester Cty Sch. Bd.*, 400 F. Supp. 3d 444 (E.D. Va. 2019) (same); *Adams v. Sch. Bd. of St. Johns Cty*, 318 F. Supp. 3d 1293 (M.D. Fla. 2018) (same); *M.A.B. v. Bd. of Educ. of Talbot Cty*, 286 F. Supp. 3d 704, 719-22 (D. Md. 2018) (same); *Evancho v. Pine-Richland Sch. Dist.*, 237 F. Supp. 3d 267, 288 (W.D. Pa. 2017) (same).

C. Movants' Interests Are Not Adequately Represented By an Existing Party.

Andraya and Terry's interests are not adequately protected by the current defendants. The burden to demonstrate inadequacy of representation is "minimal," *Trbovich v. United Mine Workers*, 404 U.S. 528, 538 n.10 (1972), but the Second Circuit has "demanded a more rigorous showing of inadequacy in cases where the putative intervenor and a named party have the same ultimate objective," *Butler, Fitzgerald & Potter v. Sequa Corp.*, 250 F.3d 171, 179 (2d Cir. 2001). Specifically, "[w]here there is an identity of interest . . . the movant to intervene must rebut the presumption of adequate representation by the party already in the action." *Id.* at 179-80. "[R]epresentation by an existing party is determined to be adequate only if the party's 'interests are so similar to those of the intervenor that adequacy of representation is assured.'" *Willis v. Firestone Bldg. Prod. Co.*, 231 F.R.D. 447, 449 (D. Conn. 2005) (quoting *Brennan*, 260 F.3d at 133) (brackets omitted) (emphasis added by *Willis*).

In this case, Andraya and Terry seek to defend the lawfulness of Defendants' policy, but their interests and Defendants' interest are not "so similar . . . that adequacy of representation [is] assured." *Brennan*, 260 F.3d at 133. As the Second Circuit explained in *Brennan*, a defendant faced with competing discrimination claims "may . . . behave like a stakeholder rather than an advocate" because the defendant may have "an equally strong or stronger interest in bringing such litigation to an end by settlements." 260 F.3d at 133; *see also Briscoe v. City of New Haven*, 654 F.3d 200, 203 (2d Cir. 2011) (holding in context of non-party preclusion that city defending racial discrimination claim by white applicants did not adequately represent the interests of non-white applicants with contrary discrimination claims "because their interests are widely divergent").

Once again, the same is true here. Faced with the prospect of expensive litigation, Defendants' have an interest in defending their policy, but they also have an interest in bringing the litigation to a speedy and inexpensive conclusion. Andraya and Terry are the only potential parties with an undivided interest in protecting their rights to equal treatment. *See Wright & Miller*, 7C Fed. Prac. & Proc. Civ. § 1909 (“Since the rule is satisfied if there is a serious possibility that the representation may be inadequate, all reasonable doubts should be resolved in favor of allowing the absentee, who has an interest different from that of any existing party, to intervene so that the absentee may be heard in his own behalf.”).

Moreover, although Defendants may be willing to defend the lawfulness of their current athletic policy, they may not have a similar incentive to argue that the policy is legally required by Title IX and the Equal Protection Clause. *See N.Y. Pub. Interest Research Grp. v. Regents of Univ. of State of N.Y.*, 516 F.2d 350, 352 (2d Cir. 1975) (granting intervention because intervenors would “make a more vigorous presentation of the economic side of the argument than would the [defendants]”); *Meriwether*, 2019 WL 2052110, at *12 (holding that transgender student’s interests were not adequately represented by university defending nondiscrimination policy because university did not affirmatively argue that the policy was required by the Constitution and Title IX).

Finally, Defendants have neither the same incentive nor the same ability as Andraya and Terry to rebut the numerous factual inaccuracies in Plaintiff’s complaint and to ensure that their personal information and history is correctly presented. Terry and Andraya are best positioned to contest the allegations that are directed at them personally, to provide their responses to the Plaintiffs’ alleged injuries, and to accurately and fully identify the harms that would result from Plaintiffs’ requested relief. They deserve the opportunity to answer these inaccuracies directly,

rather than relying on the Defendants to do so with only partial information. *See, e.g., Day v. Sebelius*, 227 F.R.D. 668, 674 (D. Kan. 2005) (granting intervention where “none of the[] existing defendants are or ever will be personally impacted by [the challenged law]. The proposed intervenors may have access to evidence that the government of the state of Kansas and the officials of Kansas colleges may not have.”)

II. In the Alternative, Andraya and Terry Should Be Granted Permissive Intervention.

Andraya and Terry also satisfy the requirements for permissive intervention under Rule 24(b)(1). On a timely motion, the Court may permit anyone to intervene who has a claim or defense that shares a common question of law or fact with the main action. Fed. R. Civ. P. 24(b)(1). In exercising its discretion, the Court “considers substantially the same factors” as for an intervention as of right. “*R Best Produce v. Shulman-Rabin Marketing*, 467 F.3d 238, 240 (2d Cir. 2006). “A district court may grant a motion for permissive intervention if the application is timely and if the ‘applicant’s claim or defense and the main action have a question of law or fact in common.’” *In re Holocaust Victim Assets Litig.*, 225 F.3d 191, 202 (2d Cir. 2000) (quoting Fed. R. Civ. P. 24(b)(2)).

Permissive intervention is particularly appropriate here because the Defendants may face multiple lawsuits with conflicting results if Andraya and Terry are not joined as parties. Indeed, Federal Rule of Civil Procedure 19(a)(1)(B) specifically instructs that a person is considered an “indispensable party” if they “claim[] an interest relating to the subject of the action and [are] so situated that disposing of the action in the person’s absence may . . . leave an existing party subject to a substantial risk of incurring double, multiple, or otherwise inconsistent obligations because of the interest.” *See Briscoe*, 654 F.3d at 203 (advising that when faced with potential

competing discrimination suits, an employer should join all interested parties so they can be bound by the same litigation).

The same considerations support granting permissive intervention here. If Andraya and Terry are not permitted to intervene, a settlement or other resolution of the case would likely lead to subsequent litigation by Andraya, Terry, and other transgender student-athletes whose rights are affected under the resolution but not represented in the litigation. *See Students & Parents for Privacy v. U.S. Dep't of Educ.*, No. 16 C 4945, 2016 WL 3269001, at *3 (N.D. Ill. June 15, 2016) (allowing transgender student to intervene because granting the motion to intervene could obviate subsequent lawsuits).

CONCLUSION

For all the foregoing reasons, the Motion of Andraya and Thania Edwards on behalf of her daughter T.M. to Intervene should be granted.

Respectfully submitted,

/s/ Dan Barrett

Dan Barrett (# ct29816)
ACLU Foundation of Connecticut
765 Asylum Avenue, 1st Floor
Hartford, CT 06105
(860) 471-8471
e-filings@acluct.org

Chase Strangio*
Joshua A. Block*
Lindsey Kaley*
James D. Esseks*
Galen Sherwin*
American Civil Liberties Union
Foundation
125 Broad Street, 18th Floor
New York, NY 10004
Phone: (212) 549-2500
cstrangio@aclu.org

jbloc@aclu.org
lkaley@aclu.org
jesseks@aclu.org
gsherwin@aclu.org

*Pro hac vice admissions pending

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Exhibit 1
Declaration of Andraya Yearwood

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

SELINA SOULE, *et al.*,)
)
 Plaintiffs,)
)
 v.)
)
 CONNECTICUT ASSOCIATION OF)
 SCHOOLS, INC. *et al.*,)
)
 Defendants)
)
 ANDRAYA YEARWOOD and THANIA)
 EDWARDS on behalf of her daughter, T.M.,)
)
 Proposed Intervenors)
)
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No. 3:20-cv-00201-RNC

**DECLARATION OF ANDRAYA
YEARWOOD**

February 20, 2020

**DECLARATION OF ANDRAYA YEARWOOD IN SUPPORT OF MOTION TO
INTERVENE**

I, Andraya Yearwood, declare as follows:

1. I am eighteen years old and live in Cromwell, CT. I attend Cromwell High School where I am a senior.
2. I was assigned the sex of male at birth but have always known I was a girl. It was always something that just felt true inside but I did not have the words to share it until I came out as transgender the summer before I started eighth grade. My family supported me throughout my transition. By the time I started high school I was known to everyone as a girl and ever since I have been living all aspects of my life as a girl.

3. I legally changed my name to Andraya and underwent puberty blocking treatment such that I never went through full puberty in my assigned sex. I currently take hormone therapy and have hormone levels typical of non-transgender girls.

4. I started to run track when I was in seventh grade. I love to run and particularly enjoy the connection to and camaraderie with my teammates. Running has been so important for my identity, my growth as a person, and my ability to survive in a world that discriminates against me.

5. I am thankful that I live in Connecticut where I can be treated as a girl in all aspects of life and not face discrimination at school.

6. I have been running on the girls' team since ninth grade and I have always been supported by my teammates and coaches. Everyone at my school knows me and treats me as a girl.

7. During the track season I train 2 hours each day, 5 days each week. I work hard in every thing I do.

8. Both my running and my mental health are negatively impacted by all the media attention and language that people use calling me a "boy" and a "cheater" and saying it is "unfair" for me to run.

9. If I was not on a team for girls, then I would not be able to be on any team.

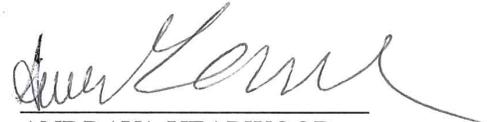
10. It can be difficult for people to understand but my identity as a girl is just as real as other girls and when I am told that I am a boy or a male, it makes me want to stop running.

11. At the Connecticut State Championship for Class S, I was disqualified in the 55m and my indoor season for the 55m is over. I run track for the full experience and not just to win. In fact, I have frequently placed below the top spots and still enjoy the chance to participate in the sport I love. At multiple meets, Chelsea Mitchell and other non-transgender girls have placed ahead of me in the 55m, the 100m and other races.

12. I have been completely demoralized by the all the negative attention surrounding my high school track career and hope that I can move on to other things in college. I have not been recruited to run track in college and at this time I intend to finish my track career this season. For my final high school season, the only way I can be a part of track is if I continue to participate on the girls' team. I have been on the team for four years, I am a girl, and I want to be treated like a girl.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED: February 20, 2020


ANDRAYA YEARWOOD

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Exhibit 2
Declaration of T.M.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

SELINA SOULE, *et al.*,)
)
 Plaintiffs,)
)
 v.)
)
 CONNECTICUT ASSOCIATION OF)
 SCHOOLS, INC. *et al.*,)
)
 Defendants)
)
 ANDRAYA YEARWOOD and THANIA)
 EDWARDS on behalf of her daughter, T.M.,)
)
 Proposed Intervenors)
)
 _____)

No. 3:20-cv-00201-RNC

DECLARATION OF T.M.

February 20, 2020

DECLARATION OF T.M. IN SUPPORT OF MOTION TO INTERVENE

I, T.M., declare as follows:

1. I am seventeen years old and a senior at Bloomfield High School in Bloomfield, CT.
2. I was born in Connecticut and have lived in the state for my entire life.
3. At birth I was assigned the sex of male but I have known that I am a girl since at least the fifth grade. When I was younger I just did not have the language to explain what made me different and it took me several years before I was able to come out as transgender.
4. I finally came out as transgender in tenth grade and have been living as a girl since then. I currently take hormone therapy that brings my body into alignment with the girl that I am. I have hormone levels that are typical of non-transgender girls.

5. I have a birth certificate that classifies my sex as female and am known as a girl in all aspects of my life.

6. I have been running track since I was in ninth grade.

7. During the season, I train between 4 and 5 hours each day, 5 days each week.

8. Running track is a central part of my life. I train and compete because it gives me a sense of calm and joy. When I run, I feel free. It is so important for me because so much of my life I have felt trapped. And I know that as a black trans girl I am going to face a lifetime of discrimination. Participating in track helps me feel safe.

9. I am grateful to live in Connecticut, a state that has protected my rights for many years.

10. When I came out as transgender publicly and was diagnosed with gender dysphoria, I started to compete in girls' track because it was essential to my health that I be treated as a girl in all aspects of life. This was in tenth grade.

11. At my school, I have the support of my coaches and teammates who recognize and treat me as a girl. I am a part of the team and it is only people from other schools who call me a boy or try to get me banned from girls' track.

12. At home and outside of track, I have the support of my friends and family who recognize and love me for who I am.

13. The joy I feel from running is often negatively impacted by people who call me a cheater or a boy. I am aware that for the past two years, my name has been constantly used in the media and I have been called a "boy", "a biological male", "a male" and a "cheater". These attacks are deeply painful. I am a girl and every time I am

referred to as anything other than a girl, it hurts and it makes me lose confidence and sends me in a spiral of sadness.

14. I work hard and have enjoyed a lot of success in athletics, which I am grateful for. I have also had times when I have not come in first place, including at the Connecticut State Championship for Class S in the 55m held on Friday, February 14, 2020. Plaintiff Chelsea Mitchell came in first and I came in second. I participate in track not solely to win but mainly for the experience, the competition, the connection and the release. At different times, Chelsea has placed ahead of me in the 55m, the 100m, and the 300m.

15. If I am told that I have to run with the boys, then I won't be able to run at all. I will lose everything that I have trained for and will miss out on my final races of high school.

16. I am hoping to run in college and am still deciding what college to attend. Based on my experience and the experience of my teammates, my understanding is that college recruiters contact and recruit track athletes based on times and not based on placement in individual races. All times for track races are publicly available for recruiters to search and use for scouting.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED: February 20, 2020

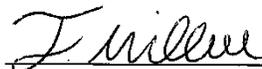

T.M.

Exhibit A



Cromwell HS Panthers - Cromwell, CT

Andraya Yearwood Track & Field Bio

2020 Indoor Season
Cromwell HS

12th Grade

Rankings 2020 Indoor

55 Meter Dash

1	7.39	Jan 2	Shoreline Conference Meet #1	V F
1	7.19	Jan 11	Shoreline Coaches Invite	V P
1	7.06	Jan 11	Shoreline Coaches Invite	V F
1	7.17	Jan 13	Old Saybrook Qualifier	V F
1	7.04	Jan 24	HK HS Invite	V P
1	7.02 SR	Jan 24	HK HS Invite	V F
1	7.29	Feb 8	Shoreline Conference Championship	V P
1	7.18	Feb 8	Shoreline Conference Championship	V F
--	FS	Feb 14	CIAC Combined Class S Championships	V P

Long Jump - 15' 0.75"
Team: 2nd S: 20th CT: 89th
National: 2292nd

55 Meter Dash - 7.02
Team: 1st S: 1st CT: 1st
National: 11th

Season Records

55 Meter Dash

2018 Indoor	12	6.9h
2019 Indoor	11	7.01 PR *
2020 Indoor	12	7.02

100 Meters

2017 Outdoor	9	12.17 PR
2018 Outdoor	10	12.22
2019 Outdoor	11	12.20

200 Meters

2017 Outdoor	9	25.37
2018 Outdoor	10	25.33 PR *
2019 Outdoor	11	25.94

300 Meters

2018 Indoor	12	41.62 PR
2019 Indoor	11	41.98

400 Meters

2018 Outdoor	10	1:04.97 PR
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Long Jump

2	15' 0.75 PR	Jan 13	Old Saybrook Qualifier	V F
---	-------------	--------	------------------------	-----

4x200 Relay

1	1:53.95	Jan 2	Shoreline Conference Meet #1 Andraya Yearwood, Jordan Pare, Amanda Chaves, Taylor Santos	V F
3	1:51.82	Jan 11	Shoreline Coaches Invite Amanda Chaves, Jordan Pare, Melissa Woodcock, Andraya Yearwood	V F

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7	1:51.28	Feb 8	Shoreline Conference Championship Andraya Yearwood, Taylor Santos, Amanda Chaves, Jordan Pare	V F	55m Hurdles - 33" 2019 Indoor 11 9.18 PR
2	1:52.25	Feb 14	CIAC Combined Class S Championships Taylor Santos, Amanda Chaves, Jordan Pare, Andraya Yearwood	V F	High Jump 2019 Indoor 11 4' 6 PR
4x400 Relay					Long Jump 2020 Indoor 12 15' 0.75 PR
1	4:36.34	Jan 2	Shoreline Conference Meet #1 Amanda Chaves, Taylor Santos, Jordan Pare, Andraya Yearwood	V F	Triple Jump 2019 Outdoor 11 35' 10 PR
2	4:20.02	Jan 11	Shoreline Coaches Invite Amanda Chaves, Taylor Santos, Jordan Pare, Andraya Yearwood	V F	*Improvement
1	4:23.76	Jan 24	HK HS Invite Andraya Yearwood, Amanda Chaves, Taylor Santos, Jordan Pare	V F	
2	4:26.38	Feb 8	Shoreline Conference Championship Amanda Chaves, Jordan Pare, Andraya Yearwood, Taylor Santos	V F	
2	4:17.17	Feb 14	CIAC Combined Class S Championships Andraya Yearwood, Amanda Chaves, Taylor Santos, Jordan Pare	V F	
12	4:15.33	Feb 22	CIAC Combined State Open Championships Andraya Yearwood, Amanda Chaves, Taylor Santos, Jordan Pare	V F	

2019 Outdoor Season
Cromwell HS

11th Grade

SA027

100 Meters

3	12.71	Apr 6	Bloomfield HS Invitational	V P
1	12.56	May 4	Marty Roberts Invitational	V P
1	12.31	May 4	Marty Roberts Invitational	V F
1	12.58	May 10	Runnin' Rams Invite	V F
1	12.77	May 22	Shoreline Conference Outdoor Championship	V P
1	12.63	May 22	Shoreline Conference Outdoor Championship	V F
3	12.50 (-1.4)	May 30	CIAC Combined Class S Championship	V P
3	12.28 (-.8)	May 30	CIAC Combined Class S Championship	V F
5	12.20 (.9) SR	Jun 3	CIAC Combined State Open Championship	V P
4	12.22 (2.8)	Jun 3	CIAC Combined State Open Championship	V F

200 Meters

3	25.94 SR	Apr 6	Bloomfield HS Invitational	V F
--	SCR	May 30	CIAC Combined Class S Championship	V F

400 Meters

--	DNS	May 30	CIAC Combined Class S Championship	V F
----	-----	--------	---------------------------------------	-----

Triple Jump

2	35' 10 PR	May 22	Shoreline Conference Outdoor Championship	V F
---	-----------	--------	--	-----

4x100 Relay

3	52.30	May 4	Marty Roberts Invitational Andraya Yearwood, Caitlin DellaRatta, Eliza Weston, Cara Jordan	V F
1	52.27	May 22	Shoreline Conference Outdoor Championship Caitlin DellaRatta, Cara Jordan, Eliza Weston, Andraya Yearwood	V F
3	51.47	May 30	CIAC Combined Class S Championship Andraya Yearwood, Caitlin DellaRatta, Taylor Santos, Cara Jordan	V F
27	52.03	Jun 3	CIAC Combined State Open Championship Andraya Yearwood, Caitlin DellaRatta, Taylor Santos, Cara Jordan	V F

4x400 Relay

1	4:10.91	May 22	Shoreline Conference Outdoor Championship Cara Jordan, Caitlin DellaRatta, Taylor Santos, Andraya Yearwood	V F
3	4:15.64	May 30	CIAC Combined Class S Championship Taylor Santos, Caitlin DellaRatta, Andraya Yearwood, Cara Jordan	V F
18	4:13.97	Jun 3	CIAC Combined State Open Championship Taylor Santos, Caitlin DellaRatta, Andraya Yearwood, Cara Jordan	V F

2019 Indoor Season
Cromwell HS

11th Grade

55 Meter Dash

1	7.47	Dec 22	<u>U</u> Hartford Public #2	V F
1	7.38	Feb 2	Shoreline Conference Championship	V P
1	7.33	Feb 2	Shoreline Conference Championship	V F
2	7.30	Feb 7	CIAC Combined Class S Championships	V P
3	7.33	Feb 7	CIAC Combined Class S Championships	V F
2	7.07	Feb 16	CIAC Combined State Open Championships	V P
2	7.01 PR	Feb 16	CIAC Combined State Open Championships	V F
3	7.24	Mar 2	New England Indoor Track & Field Championships	V P
3	7.17	Mar 2	New England Indoor Track & Field Championships	V F

300 Meters

1	43.48	Jan 3	Shoreline Conference League Meet #1	V F
2	41.98 SR	Jan 12	Shoreline Conference Coaches Invitational	V F
1	43.29	Jan 14	Old Saybrook Qualifier	V F
1	43.03	Feb 2	Shoreline Conference Championship	V F
--	SCR	Feb 7	CIAC Combined Class S Championships	V F

55m Hurdles - 33"

1	9.36	Jan 12	Shoreline Conference Coaches Invitational	V P
1	9.18 PR	Jan 12	Shoreline Conference Coaches Invitational	V F
1	9.26	Jan 14	Old Saybrook Qualifier	V F
2	9.49	Jan 25	SL Conf Meet #2	V F

High Jump

9 4' 6 Jan 12 Shoreline Conference V F
Coaches Invitational

4 4' 6 PR Jan 14 Old Saybrook Qualifier V F

4x200 Relay

7 1:54.88 Dec 22 Hartford Public #2 V F
Caitlin DellaRatta, Cara Jordan,
Andraya Yearwood, Jamie
Rankins

7 1:53.73 Jan 3 Shoreline Conference V F
League Meet #1
Kaitlin Lewkowicz, Melissa
Woodcock, Jordan Pare,
Andraya Yearwood

8 1:52.04 Jan 12 37th Yale Interscholastic 12 F
Track Classic
Andraya Yearwood, Melissa
Woodcock, Kaitlin Lewkowicz,
Jordan Pare

2 1:53.19 Jan 18 HK Invitational V F
Andraya Yearwood, Melissa
Woodcock, Kaitlin Lewkowicz,
Jordan Pare

1 1:52.25 Feb 2 Shoreline Conference V F
Championship
Andraya Yearwood, Melissa
Woodcock, Kaitlin Lewkowicz,
Jordan Pare

3 1:52.39 Feb 7 CIAC Combined Class S V F
Championships
Andraya Yearwood, Melissa
Woodcock, Kaitlin Lewkowicz,
Jordan Pare

SMR 1600m

7 4:34.35 Dec 22 Hartford Public #2 V F
Andraya Yearwood, Kayla
Nolan, Caitlin DellaRatta, Cara
Jordan

1	4:41.31	Jan 3	Shoreline Conference League Meet #1 Andraya Yearwood, Caitlin DellaRatta, Taylor Santos, Cara Jordan	V F
1	4:23.87	Jan 18	HK Invitational Andraya Yearwood, Jordan Pare, Caitlin DellaRatta, Cara Jordan	V F
1	4:20.26	Jan 25	SL Conf Meet #2 Andraya Yearwood, Jordan Pare, Caitlin DellaRatta, Cara Jordan	V F
1	4:20.13	Feb 7	CIAC Combined Class S Championships Andraya Yearwood, Jordan Pare, Caitlin DellaRatta, Cara Jordan	V F
4	4:21.85	Feb 16	CIAC Combined State Open Championships Andraya Yearwood, Jordan Pare, Caitlin DellaRatta, Cara Jordan	V F

2018 Outdoor Season

Cromwell HS

10th Grade

100 Meters

2	12.70	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V P
2	12.50	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
2	12.48	May 5	Middletown Outdoor Track and Field Invite Varsity	V P
2	12.44	May 5	Middletown Outdoor Track and Field Invite Varsity	V F

1	12.37	May 23	Shoreline Conference Championship	V P
1	12.28	May 23	Shoreline Conference Championship	V F
2	12.25 (-.7)	May 29	CIAC State Class M Championship	V P
2	12.22 (-2.0) SR	May 29	CIAC State Class M Championship	V F
4	12.39 (1.5)	Jun 4	CIAC State Open Championship	V P
2	12.29 (1.0)	Jun 4	CIAC State Open Championship	V F

200 Meters

2	26.03	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
4	25.55	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
1	26.54	May 12	Runnin' Rams Invitational	V F
1	26.03	May 23	Shoreline Conference Championship	V F
5	26.06 (-2.0)	May 29	CIAC State Class M Championship	V F
7	25.33 (2.1) PR	Jun 4	CIAC State Open Championship	V F

400 Meters

7	1:04.97 PR	May 23	Shoreline Conference Championship	V F
--	SCR	May 29	CIAC State Class M Championship	V F

4x100 Relay

7	53.76	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite Andraya Yearwood, Melissa Woodcock, Kaitlin Lewkowicz, Jordan Pare	V F
--	DQ	May 5	Middletown Outdoor Track and Field Invite Varsity Melissa Woodcock, Andraya Yearwood, Jordan Pare, Kaitlin Lewkowicz	V F
4	52.74	May 23	Shoreline Conference Championship Andraya Yearwood, Melissa Woodcock, Kaitlin Lewkowicz, Jordan Pare	V F
14	52.23	May 29	CIAC State Class M Championship Andraya Yearwood, Melissa Woodcock, Kaitlin Lewkowicz, Jordan Pare	V F

2018 Indoor Season

Cromwell HS

12th Grade

55 Meter Dash

1	7.37	Dec 21	Old Saybrook Qualifier	V F
1	6.9h SR	Jan 4	Shoreline Conference League Meet #1	V F
1	7.50	Jan 20	Shoreline Coaches Invitational	V P
1	7.46	Jan 20	Shoreline Coaches Invitational	V F
1	7.38	Jan 26	SLC League Meet #2	V F
1	7.56	Feb 3	SLC Indoor TF Championship	V P
1	7.34	Feb 3	SLC Indoor TF Championship	V F

1	7.32	Feb 10	CIAC Combined Class S Championship	V P
1	7.31	Feb 10	CIAC Combined Class S Championship	V F
2	7.30	Feb 17	CIAC Combined State Open Championship	V P
4	7.28	Feb 17	CIAC Combined State Open Championship	V F
5	7.33	Mar 3	New England HS Championship	V P
3	7.30	Mar 3	New England HS Championship	V F

300 Meters

1	44.59	Dec 21	Old Saybrook Qualifier	V F
1	44.1h	Jan 4	Shoreline Conference League Meet #1	V F
4	44.18	Jan 20	Shoreline Coaches Invitational	V F
1	43.25	Feb 3	SLC Indoor TF Championship	V F
2	41.62 PR	Feb 10	CIAC Combined Class S Championship	V F
11	42.14	Feb 17	CIAC Combined State Open Championship	V F

4x200 Relay

8	1:54.24	Jan 20	Shoreline Coaches Invitational Jordan Pare, Caitlin DellaRatta, McKenzie Keane, Andraya Yearwood	V F
2	1:53.03	Feb 3	SLC Indoor TF Championship Jordan Pare, Melissa Woodcock, Andraya Yearwood, McKenzie Keane	V F

7 1:53.24 Feb 10 CIAC Combined Class S V F
 Championship
 Jordan Pare, McKenzie Keane,
 Melissa Woodcock, Andraya
 Yearwood

2017 Outdoor Season

Cromwell HS

9th Grade

100 Meters

1	13.21	May 13	Runnin' Rams Invitational	V P
1	12.81	May 13	Runnin' Rams Invitational	V F
1	12.67	May 24	Shoreline Conference Outdoor Track and Field Championship	V P
1	12.71	May 24	Shoreline Conference Outdoor Track and Field Championship	V F
2	12.89 (-.8)	May 30	CIAC CLASS M OTF CHAMPIONSHIP	V P
1	12.66 (-1.6)	May 30	CIAC CLASS M OTF CHAMPIONSHIP	V F
2	12.36 (1.4)	Jun 5	CIAC STATE OPEN OTF CHAMPIONSHIP	V P
3	12.41 (1.2)	Jun 5	CIAC STATE OPEN OTF CHAMPIONSHIP	V F
3	12.17 (.7) PR	Jun 10	New England Outdoor Track and Field Championships	V P
2	12.22 (1.1)	Jun 10	New England Outdoor Track and Field Championships	V F

200 Meters

3	25.75	May 6	Middletown Outdoor Track & Field Invite Varsity	V F
1	26.48	May 24	Shoreline Conference Outdoor Track and Field Championship	V F

1 26.08 (1.2) SR May 30 CIAC CLASS M OTF V F

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8 25.37 (1.2) SR Jun 5 CIAC STATE OPEN OTF V F
CHAMPIONSHIP

4x100 Relay

18 54.56 May 6 Middletown Outdoor V F
Track & Field Invite
Varsity
Erica Cantarella, Amaya Feitel,
Eliza Weston, Andraya
Yearwood

5 54.23 May 13 Runnin' Rams Invitational V F
Erica Cantarella, Amaya Feitel,
Andraya Yearwood, Eliza
Weston

-- DNF May 30 CIAC CLASS M OTF V F
CHAMPIONSHIP
Jordan Pare, Amaya Feitel, Eliza
Weston, Andraya Yearwood

Exhibit B


Bloomfield HS Hawks - Bloomfield, CT


Terry Miller Track & Field Bio

2020 Indoor Season

Bloomfield HS

12th Grade


Rankings

2020 Indoor

55 Meter Dash

10	7.75	Dec 27	Holiday Challenge	V P
1	7.48	Jan 4	Elm City Coaches Invite	V P
1	7.44	Jan 4	Elm City Coaches Invite	V F
1	7.52	Jan 11	Rhody Classic	V P
1	7.45	Jan 11	Rhody Classic	V F
1	7.42	Jan 18	East Coast Invitational	3 P
1	7.36	Jan 18	East Coast Invitational	3 F
9	7.41	Jan 25	Bullis Champion Speed Invitational	1 F
1	7.40	Feb 1	CCC Indoor Track & Field Championships	S P
1	7.37	Feb 1	CCC Indoor Track & Field Championships	S F
1	7.41	Feb 10	Capital Prep Last Chance Meet (Hartford Public Schools)	V F
1	7.34	Feb 14	CIAC Combined Class S Championships	V P
2	7.20 SR	Feb 14	CIAC Combined Class S Championships	V F
3	7.33	Feb 22	CIAC Combined State Open Championships	V P
3	7.37	Feb 22	CIAC Combined State Open Championships	V F
7	7.35	Feb 29	33rd New England Interscholastic Championships	V P

200 Meters - 26.40

Team: 1st S: 2nd CT: 2nd

National: 293rd

55 Meter Dash - 7.20

Team: 1st S: 3rd CT: 3rd

National: 70th

60 Meter Dash - 8.00

Team: 1st S: 2nd CT: 2nd

National: 244th

300 Meters - 43.47

Team: 2nd S: 12th CT: 38th

National: 734th


Season Records

55 Meter Dash

2019 Indoor 11 6.91 PR

2020 Indoor 12 7.20

60 Meter Dash

2020 Indoor 12 8.00 PR

100 Meters

2018 Outdoor 10 11.72 PR

2019 Outdoor 11 11.64 PR *

200 Meters

2018 Outdoor 10 24.17 PR

2019 Outdoor 11 24.18 PR

5	7.31	Feb 29	33rd New England Interscholastic Championships	V F	2020 Indoor	12	26.40 PR
					300 Meters		
					2019 Indoor	11	38.90 PR
					2020 Indoor	12	43.47
60 Meter Dash							
9	8.00 PR	Jan 25	Bullis Champion Speed Invitational	1 P	400 Meters		
3	8.08	Jan 25	Hillhouse Track Classic	V F	2018 Outdoor	10	56.59 PR
					2019 Outdoor	11	57.81 PR
200 Meters							
1	26.40 PR	Jan 18	East Coast Invitational	3 F	Long Jump		
					2019 Outdoor	11	17' 2 PR
300 Meters							
					*Improvement		
30	45.42	Dec 27	Holiday Challenge	V F			
13	44.92	Jan 4	Elm City Coaches Invite	V F			
10	45.01	Jan 11	Rhody Classic	V F			
8	43.47 SR	Jan 25	Bullis Champion Speed Invitational	1 F			
6	43.60	Feb 1	CCC Indoor Track & Field Championships	S F			
3	43.53	Feb 10	Capital Prep Last Chance Meet (Hartford Public Schools)	V F			
16	46.01	Feb 14	CIAC Combined Class S Championships	V F			
4x200 Relay							
3	1:52.12	Jan 4	Elm City Coaches Invite Terry Miller, Laniyah Henderson, Jahmiha Lindo, Jady Gibson	V F			
1	1:49.30	Jan 17	East Coast Invitational Jady Gibson, Jahmiha Lindo, Laniyah Henderson, Terry Miller	3 F			
1	1:47.14	Feb 14	CIAC Combined Class S Championships Jady Gibson, Jahmiha Lindo, Laniyah Henderson, Terry Miller	V F			

4	1:47.14	Feb 22	CIAC Combined State Open Championships Jadyn Gibson, Jahmiha Lindo, Laniyah Henderson, Terry Miller	V F
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2019 Outdoor Season

Bloomfield HS

11th Grade

100 Meters

1	11.94	Apr 2	Hartford Public @ Bloomfield	V F
1	12.05	Apr 6	Bloomfield HS Invitational	V P
1	13.14	Apr 9	Bloomfield @ Rocky Hill	V F
2	12.18	Apr 13	Knighttime Invitational	V P
1	11.88	Apr 13	Knighttime Invitational	V F
1	13.26	Apr 16	Wethersfield @ Bloomfield	V F
1	12.19 ^(1.6)	Apr 20	New York Relays	inv P
1	11.88 ⁽¹⁾	Apr 20	New York Relays	inv F
1	12.14	Apr 23	Bulkeley @ Bloomfield	V F
1	12.91	May 7	Newington @ Bloomfield	V F
3	12.64	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V P
1	12.03	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
1	12.17	May 14	Windsor @ Bloomfield	V F
2	12.18 ^(-1.8)	May 30	CIAC Combined Class S Championship	V P
1	11.93 ^(-.8)	May 30	CIAC Combined Class S Championship	V F
1	11.64 ^{(2.5) PR}	Jun 3	CIAC Combined State Open Championship	V P
--	FS ^(2.8)	Jun 3	CIAC Combined State Open Championship	V F

200 Meters

1	25.08	Mar 30	Season Opener	V F
1	27.48	Apr 2	Hartford Public @ Bloomfield	V F
1	25.19	Apr 6	Bloomfield HS Invitational	V F
2	28.07	Apr 9	Bloomfield @ Rocky Hill	V F
1	25.08	Apr 16	Wethersfield @ Bloomfield	V F
1	24.18 PR	Apr 23	Bulkeley @ Bloomfield	V F
1	24.20	May 7	Newington @ Bloomfield	V F
1	24.48	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
1	25.87	May 14	Windsor @ Bloomfield	V F
1	24.47 (-2.4)	May 30	CIAC Combined Class S Championship	V F
1	24.33 (1.0)	Jun 3	CIAC Combined State Open Championship	V F
1	24.57 (-.7)	Jun 8	74th New England Interscholastic Track and Field Championships	V F

400 Meters

1	1:05.33	Apr 2	Hartford Public @ Bloomfield	V F
1	1:01.97	Apr 9	Bloomfield @ Rocky Hill	V F
1	1:00.04	Apr 16	Wethersfield @ Bloomfield	V F
1	59.18	Apr 23	Bulkeley @ Bloomfield	V F
1	1:00.90	May 7	Newington @ Bloomfield	V F
1	57.81 PR	May 14	Windsor @ Bloomfield	V F
--	DNS	May 30	CIAC Combined Class S Championship	V F

Long Jump

1	16' 6	Mar 30	Season Opener	V F
2	16' 2.5	Apr 2	Hartford Public @ Bloomfield	V F

1	17' 2 PR	Apr 6	Bloomfield HS Invitational	V F
3	15' 1	Apr 16	Wethersfield @ Bloomfield	V F
--	FOUL	Apr 20	New York Relays	V F
2	15' 5	Apr 23	Bulkeley @ Bloomfield	V F

4x400 Relay

1	4:18.24	Apr 27	26th Stafford Rotary Invitational Jahlia Banton, Santorini Mooving, Terry Miller, Yaraliz Salgado-Luciano	V F
1	5:20.41	May 7	Newington @ Bloomfield Jahlia Banton, Shante Brown, Terry Miller, Jady Gibson	V F
1	4:01.04	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday) Shante Brown, Terry Miller, Jillian Mars, Jahlia Banton	V F
1	4:03.48	May 30	CIAC Combined Class S Championship Jahlia Banton, Terry Miller, Jady Gibson, Jillian Mars	V F
1	3:57.97	Jun 3	CIAC Combined State Open Championship Jahlia Banton, Terry Miller, Jady Gibson, Jillian Mars	V F
1	3:51.88	Jun 8	74th New England Interscholastic Track and Field Championships Jahlia Banton, Terry Miller, Jady Gibson, Jillian Mars	V F

4x800 Relay

1	10:34.90	Mar 30	Season Opener Terry Miller, Jillian Mars, Jady Gibson, Jalisa Turner	V F
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SMR 100-100-200-400m

1 1:50.69 Apr 13 Knighttime Invitational V F
 Jahlia Banton, Shante Brown,
 Jillian Mars, Terry Miller

Swedish 100-200-300-400m

1 2:17.45 Apr 13 Knighttime Invitational V F
 D'Jior Delisser, Jady Gibson,
 Elicia Colon, Terry Miller

2019 Indoor Season

Bloomfield HS

11th Grade

55 Meter Dash

1	7.20	Dec 8	Hillhouse Developmental	1 F
1	7.24	Dec 15	Hillhouse Invitational	V S
1	7.30	Dec 15	Hillhouse Invitational	V P
1	7.12	Dec 15	Hillhouse Invitational	V F
1	7.19	Dec 22	Hillhouse Qualifier	V F
1	7.32	Dec 26	North Shore Invitational	V P
1	7.24	Dec 26	North Shore Invitational	V F
1	7.22	Dec 28	Boston Holiday Challenge	V P
1	7.14	Dec 28	Boston Holiday Challenge	V F
1	7.22	Jan 5	URI Rhody Classic	1 P
1	7.24	Jan 5	URI Rhody Classic	1 F
1	7.00	Jan 12	37th Yale Interscholastic Track Classic	5 S
1	7.12	Jan 12	37th Yale Interscholastic Track Classic	5 P
--	FS	Jan 12	37th Yale Interscholastic Track Classic	5 F
1	7.22	Jan 19	East Coast Invitational	1 P
1	7.16	Jan 19	East Coast Invitational	1 F
1	7.15	Jan 26	CCC Indoor TF Championship	S P
1	6.91 PR	Jan 26	CCC Indoor TF Championship	S F

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1	7.16	Feb 7	CIAC Combined Class S Championships	V P
1	7.03	Feb 7	CIAC Combined Class S Championships	V F
1	7.00	Feb 16	CIAC Combined State Open Championships	V P
1	6.95	Feb 16	CIAC Combined State Open Championships	V F
2	7.09	Mar 2	New England Indoor Track & Field Championships	V P
1	6.94	Mar 2	New England Indoor Track & Field Championships	V F

300 Meters

1	42.87	Dec 8	Hillhouse Developmental	1 F
1	40.42	Dec 15	Hillhouse Invitational	V F
1	39.41	Dec 26	North Shore Invitational	V F
1	40.60	Jan 5	URI Rhody Classic	1 F
1	38.90 PR	Jan 12	37th Yale Interscholastic Track Classic	5 F
1	39.76	Jan 26	CCC Indoor TF Championship	S F
1	39.91	Feb 7	CIAC Combined Class S Championships	V F
1	40.13	Feb 16	CIAC Combined State Open Championships	V F
1	39.27	Mar 2	New England Indoor Track & Field Championships	V F

4x200 Relay

2	1:54.61	Dec 8	Hillhouse Developmental Terry Miller, Elicia Colon, Jahmiha Lindo, Santorini Mooving	1 F
1	1:45.17	Dec 22	Hillhouse Qualifier Jillian Mars, Terry Miller, Shante Brown, Jady Gibson	V F

4x400 Relay

2	4:08.78	Dec 15	Hillhouse Invitational Jahlia Banton, Jadyne Gibson, Jillian Mars, Terry Miller	V F
1	4:12.41	Dec 22	Hillhouse Qualifier Terry Miller, Jillian Mars, Jadyne Gibson, Jahlia Banton	V F
--	DQ	Jan 19	East Coast Invitational Terry Miller, Jillian Mars, Shenequa Campbell, Jahlia Banton	1 F
1	4:01.18	Jan 26	CCC Indoor TF Championship Jadyne Gibson, Terry Miller, Jahlia Banton, Jillian Mars	S F
1	4:04.73	Feb 7	CIAC Combined Class S Championships Shante Brown, Terry Miller, Jahlia Banton, Jillian Mars	V F
2	4:02.65	Feb 16	CIAC Combined State Open Championships Terry Miller, Jillian Mars, Jahlia Banton, Shante Brown	V F
1	3:56.88	Mar 2	New England Indoor Track & Field Championships Terry Miller, Jillian Mars, Jahlia Banton, Shante Brown	V F

SMR 1600m

1	4:20.66	Jan 19	East Coast Invitational Shante Brown, Jahmiha Lindo, Terry Miller, Jillian Mars	1 F
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2018 Outdoor Season

Bulkeley HS 10th Grade

100 Meters

1	12.21	Apr 24	Bulkeley vs Bloomfield	V F
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1	12.14	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V P
1	12.22	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
1	11.95	May 5	Middletown Outdoor Track and Field Invite Varsity	V P
1	11.87	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
1	12.05	May 12	87th Greater Hartford Outdoor Invite	V P
1	11.87	May 12	87th Greater Hartford Outdoor Invite	V F
1	12.28	May 22	CCC North Division Outdoor T&F Championship	V P
1	12.19	May 22	CCC North Division Outdoor T&F Championship	V F
1	11.74 (1.2)	May 29	CIAC State Class M Championship	V P
1	11.77 (-2.0)	May 29	CIAC State Class M Championship	V F
1	11.75 (2.4)	Jun 4	CIAC State Open Championship	V P
1	11.72 (1.0) PR	Jun 4	CIAC State Open Championship	V F
1	12.46 (-4.1)	Jun 9	New England Championship	V P
1	11.97 (-1.1)	Jun 9	New England Championship	V F

200 Meters

1	24.81	Apr 24	Bulkeley vs Bloomfield	V F
1	25.35	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F

1	24.17 PR	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
1	24.58	May 12	87th Greater Hartford Outdoor Invite	V F
1	25.32	May 22	CCC North Division Outdoor T&F Championship	V F
1	24.97 (-2.0)	May 29	CIAC State Class M Championship	V F
1	24.17 (1.5)	Jun 4	CIAC State Open Championship	V F
1	24.43 (-2.6)	Jun 9	New England Championship	V F

400 Meters

1	57.57	Apr 24	Bulkeley vs Bloomfield	V F
1	58.67	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
1	56.63	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
1	57.93	May 12	87th Greater Hartford Outdoor Invite	V F
2	59.00	May 22	CCC North Division Championship	V F

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1	56.59 PR	May 29	CIAC State Class M Championship	V F
4	57.61	Jun 4	CIAC State Open Championship	V F

Exhibit C

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Glastonbury HS Tomahawks - Glastonbury, CT

Selina Soule Track & Field Bio

2020 Indoor Season

Glastonbury HS

12th Grade

Rankings

2020 Indoor

55 Meter Dash

9	7.86	Dec 21	Hillhouse Invite	V S
2	7.69	Dec 21	Hillhouse Invite	V P
3	7.72	Dec 27	Jack Long Invitational	V F
6	7.73	Jan 4	Elm City Coaches Invite	V P
3	7.60	Jan 4	Elm City Coaches Invite	V F
14	7.65	Jan 11	38th YALE INTERSCHOLASTIC TRACK CLASSIC	4 S
8	7.59	Jan 11	38th YALE INTERSCHOLASTIC TRACK CLASSIC	4 P
3	7.55	Jan 15	Snowflake Invitational	V F
1	7.55	Jan 18	SCC Coaches Invite	V P
2	7.54 SR	Jan 18	SCC Coaches Invite	V F
4	7.62	Feb 1	CCC Indoor Track & Field Championships	S P
4	7.55	Feb 1	CCC Indoor Track & Field Championships	S F
10	7.68	Feb 13	CIAC Combined Class LL Championships	V P

60 Meter Dash

5	8.13 PR	Jan 25	Hillhouse Track Classic	V F
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Long Jump

5	15' 7	Dec 21	Hillhouse Invite	V F
3	16' 6	Dec 27	Jack Long Invitational	V F
1	16' 5.5	Jan 4	Elm City Coaches Invite	V F

Long Jump - 17' 1"

Team: 1st LL: 5th CT: 12th
National: 333rd

55 Meter Dash - 7.54

Team: 1st LL: 5th CT: 19th
National: 695th

60 Meter Dash - 8.13

Team: 1st LL: 1st CT: 5th
National: 458th

Season Records

55 Meter Dash

2017 Indoor	9	7.87
2018 Indoor	10	7.80 *
2019 Indoor	11	7.36 PR *
2020 Indoor	12	7.54

60 Meter Dash

2020 Indoor	12	8.13 PR
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100 Meters

2017 Outdoor	9	13.89
2018 Outdoor	10	12.57 *
2019 Outdoor	11	12.46 PR *

200 Meters

2017 Outdoor	9	28.21
2018 Outdoor	10	26.30 PR *

6	16' 11.5	Jan 11	38th YALE INTERSCHOLASTIC TRACK CLASSIC	4 F	2019 Outdoor	11	26.30
300 Meters							
2	17' 0	Jan 15	Snowflake Invitational	V F	2017 Indoor	9	48.60
3	17' 1 SR	Jan 18	SCC Coaches Invite	V F	2019 Indoor	11	44.91 PR *
5	16' 6	Jan 25	Hillhouse Track Classic	V F	220y Hurdles - 33"		
7	16' 9	Feb 1	CCC Indoor Track & Field Championships	S F	2018 Outdoor	10	35.81 PR
5	16' 3.25	Feb 13	CIAC Combined Class LL Championships	V F	Long Jump		
					2017 Indoor	9	15' 6
8	16' 7.25	Feb 22	CIAC Combined State Open Championships	V F	2017 Outdoor	9	16' 6.5 *
					2018 Indoor	10	15' 11.75
					2018 Outdoor	10	18' 2.25 PR *
					2019 Indoor	11	18' 0 PR
4x200 Relay							
1	1:47.72	Jan 4	Elm City Coaches Invite Selina Soule, Riley Carroll, Molly Harding, Samantha Forrest	V F	2019 Outdoor	11	18' 0
					2020 Indoor	12	17' 1
					*Improvement		
1	1:45.75	Feb 13	CIAC Combined Class LL Championships Selina Soule, Molly Harding, Riley Carroll, Samantha Forrest	V F			
1	1:45.32	Feb 22	CIAC Combined State Open Championships Selina Soule, Molly Harding, Riley Carroll, Samantha Forrest	V F			

2019 Outdoor Season

Glastonbury HS

11th Grade

100 Meters

2	12.64	May 4	Middletown Outdoor Track and Field Invite Varsity	V P			
2	12.59	May 4	Middletown Outdoor Track and Field Invite Varsity	V F			
2	12.61	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V P			

4	12.73	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
2	12.57	May 18	38th Randy Smith Journal Inquirer Greater Manchester Invite	V P
3	12.46 PR	May 18	38th Randy Smith Journal Inquirer Greater Manchester Invite	V F
4	12.89 (-.4)	May 29	CIAC Combined Class LL Championship	V P
3	12.94 (-1.8)	May 29	CIAC Combined Class LL Championship	V F
14	12.79 (2.5)	Jun 3	CIAC Combined State Open Championship	V P

200 Meters

5	26.41	May 4	Middletown Outdoor Track and Field Invite Varsity	V F
10	26.82	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
7	26.68	May 18	38th Randy Smith Journal Inquirer Greater Manchester Invite	V F
5	26.30 (-1.5) SR	May 29	CIAC Combined Class LL Championship	V F
--	DNS (3.1)	Jun 3	CIAC Combined State Open Championship	V F

Long Jump

3	17' 11	May 4	Middletown Outdoor Track and Field Invite Varsity	V F
3	17' 10	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F

7	18' 0 SR	May 18	38th Randy Smith Journal Inquirer Greater Manchester Invite	V F
2	16' 9.25	May 21	CCC West Division Outdoor T&F Championship	V F
4	17' 1.25	May 29	CIAC Combined Class LL Championship	V F
6	17' 9.25	Jun 3	CIAC Combined State Open Championship	V F
11	17' 2.75 (0)	Jun 8	74th New England Interscholastic Track and Field Championships	V F

2019 Indoor Season

Glastonbury HS

11th Grade

55 Meter Dash

5	7.67	Dec 15	Hillhouse Invitational	V S
13	7.80	Dec 15	Hillhouse Invitational	V P
7	7.78	Dec 15	Hillhouse Invitational	V F
6	7.70	Dec 22	Hillhouse Qualifier	V F
1	7.64	Dec 27	Jack Long Invitational	V F
3	7.60	Jan 5	Elm City Coaches Meet	V P
3	7.53	Jan 5	Elm City Coaches Meet	V F
1	7.49	Jan 15	Snowflake Invitational	V F
3	7.54	Jan 19	SCC Coaches Invitational	V P
4	7.52	Jan 19	SCC Coaches Invitational	V F
4	7.49	Jan 26	CCC Indoor TF Championship	S P
4	7.41	Jan 26	CCC Indoor TF Championship	S F
3	7.43	Feb 9	CIAC Combined Class LL Championships	V P
3	7.36 PR	Feb 9	CIAC Combined Class LL Championships	V F
8	7.37	Feb 16	CIAC Combined State Open Championships	V P

300 Meters

3	44.91 PR	Jan 15	Snowflake Invitational	V F
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Long Jump

4	16' 8	Dec 15	Hillhouse Invitational	V F
2	17' 3	Dec 22	Hillhouse Qualifier	V F
1	17' 2.5	Dec 27	Jack Long Invitational	V F
1	16' 10	Dec 29	Hillhouse Relays	V F
1	17' 6	Jan 5	Elm City Coaches Meet	V F
9	16' 6	Jan 12	37th Yale Interscholastic Track Classic	5 F
1	17' 9.75	Jan 19	SCC Coaches Invitational	V P
1	17' 2.25	Jan 26	CCC Indoor TF Championship	S F
2	18' 0 PR	Feb 9	CIAC Combined Class LL Championships	V F
5	17' 4.25	Feb 16	CIAC Combined State Open Championships	V F
6	17' 10.25	Mar 2	New England Indoor Track & Field Championships	V F

4x200 Relay

6	1:54.03	Dec 15	Hillhouse Invitational Selina Soule, Alison Guy, Molly Harding, Emma Smith	V F
9	1:55.17	Jan 5	Elm City Coaches Meet Selina Soule, Alison Guy, Maya Bridgeford, Mary Norman	V F
2	1:48.56	Jan 26	CCC Indoor TF Championship Selina Soule, Maya Bridgeford, Alison Guy, Samantha Forrest	S F
1	1:45.43	Feb 9	CIAC Combined Class LL Championships Selina Soule, Molly Harding, Maya Bridgeford, Samantha Forrest	V F

7	1:45.38	Feb 16	CIAC Combined State Open Championships Selina Soule, Molly Harding, Maya Bridgeford, Samantha Forrest	V F
3	1:44.10	Mar 2	New England Indoor Track & Field Championships Selina Soule, Molly Harding, Maya Bridgeford, Samantha Forrest	V F
20	1:45.32	Mar 10	New Balance Nationals Indoor Selina Soule, Molly Harding, Maya Bridgeford, Samantha Forrest	EE F

SMR 1600m

2	4:17.45	Dec 22	Hillhouse Qualifier Selina Soule, Alison Guy, Angela Braga, Grace Sparrow	V F
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2018 Outdoor Season

Glastonbury HS

10th Grade

100 Meters

7	12.91	Apr 5	Avon, Glastonbury at Southington	V F
2	13.04	Apr 21	Panther Invitational Track & Field Meet	1 P
7	13.06	Apr 21	Panther Invitational Track & Field Meet	1 F
4	12.90	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V P
4	13.14	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
7	13.14c	May 1	Glastonbury at Conard	V F

8	13.11	May 5	Middletown Outdoor Track and Field Invite Varsity	V P
6	12.84	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
7	13.04c	May 8	Glastonbury, Aerospace at Hall	V F
3	12.89	May 12	87th Greater Hartford Outdoor Invite	V P
4	12.88	May 12	87th Greater Hartford Outdoor Invite	V F
2	12.83	May 19	37th Randy Smith Journal Inquirer Greater Manchester Invite	V P
2	12.70	May 19	37th Randy Smith Journal Inquirer Greater Manchester Invite	V F
1	12.96	May 22	CCC West Division Outdoor Track & Field Championship	V P
1	12.57 SR	May 22	CCC West Division Outdoor Track & Field Championship	V F
7	13.15 (-2.4)	May 30	CIAC State Class LL Championship	V P
2	12.91 (-1.8)	May 30	CIAC State Class LL Championship	V F
8	12.58 (2.4)	Jun 4	CIAC State Open Championship	V P
6	12.67 (1.0)	Jun 4	CIAC State Open Championship	V F
25	13.50 (-3.3)	Jun 9	New England Championship	V P

200 Meters

3	28.13	Apr 5	Avon, Glastonbury at Southington	V F
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3	27.70	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
2	27.34c	May 1	Glastonbury at Conard	V F
12	27.03	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
1	27.24c	May 8	Glastonbury, Aerospace at Hall	V F
1	26.30 PR	May 22	CCC West Division Outdoor Track & Field Championship	V F
13	27.05 (-.1)	May 30	CIAC State Class LL Championship	V F

220y Hurdles - 33"

2	35.81 PR	Apr 12	Vacation Invitational Relays	V F
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Long Jump

2	15' 5	Apr 5	Avon, Glastonbury at Southington	V F
1	16' 6.5	Apr 12	Vacation Invitational Relays	V F
1	17' 2	Apr 21	Panther Invitational Track & Field Meet	1 F
1	16' 8.5	Apr 27	3rd Greater Bristol Outdoor Track and Field Invite	V F
2	16' 6.25	May 1	Glastonbury at Conard	VJV F
5	16' 9.5	May 5	Middletown Outdoor Track and Field Invite Varsity	V F
2	16' 3.5	May 8	Glastonbury, Aerospace at Hall	V F
2	16' 10	May 12	87th Greater Hartford Outdoor Invite	V F

1	17' 4	May 19	37th Randy Smith Journal Inquirer Greater Manchester Invite	V F
1	17' 6.75	May 22	CCC West Division Outdoor Track & Field Championship	V F
1	18' 2.25 PR	May 30	CIAC State Class LL Championship	V F
4	17' 6.5	Jun 4	CIAC State Open Championship	V F
12	16' 11.75 (-2.0)	Jun 9	New England Championship	V F

4x100 Relay

1	52.53	Apr 12	Vacation Invitational Relays Selina Soule, Alison Guy, Lindsey Anderson, Erin McGill	V F
2	51.74c	May 8	Glastonbury, Aerospace at Hall Selina Soule, Alison Guy, Lindsey Anderson, Katie Bengtson	V F

2018 Indoor Season Glastonbury HS

10th Grade

55 Meter Dash

11	7.95	Jan 6	4th Elm City Relays	V P
8	7.80 SR	Jan 27	CCC Indoor TF Championship	S P
8	7.80	Jan 27	CCC Indoor TF Championship	S F

Long Jump

36	13' 6	Dec 16	16th Annual Hillhouse Track & Field Invitational	V F
2	15' 5	Dec 27	Jack Long Invitational Meet	V F

13	14' 4	Dec 30	2nd Hillhouse Track and Field Qualifier Meet	V F
3	15' 1	Jan 9	Snowflake Invitational	V F
27	14' 11	Jan 13	SCC Coaches Invitational 2018	V F
6	14' 4	Jan 15	3rd Frosh & Soph Meet	FS F
2	15' 11.75 SR	Jan 27	CCC Indoor TF Championship	S F
9	15' 4	Feb 10	CIAC Combined Class LL Championship	V F

4x200 Relay

24	2:00.69	Dec 16	16th Annual Hillhouse Track & Field Invitational Selina Soule, Mary Norman, Audrey Kefor, Lindsey Anderson	V F
8	1:54.74	Jan 27	CCC Indoor TF Championship Mary Norman, Alison Guy, Selina Soule, Lindsey Anderson	S F
3	1:49.63	Feb 10	CIAC Combined Class LL Championship Selina Soule, Alison Guy, Lindsey Anderson, Samantha Forrest	V F
8	1:49.19	Feb 17	CIAC Combined State Open Championship Selina Soule, Alison Guy, Lindsey Anderson, Samantha Forrest	V F

SMR 1600m

5	4:34.60	Dec 30	2nd Hillhouse Track and Field Qualifier Meet Amanda Forgione, Selina Soule, Grace Sparrow, Erin McGill	V F
2	4:23.46	Feb 10	CIAC Combined Class LL Championship Selina Soule, Lindsey Anderson, Samantha Forrest, Grace Sparrow	V F

7	4:25.06	Feb 17	CIAC Combined State Open Championship Selina Soule, Samantha Forrest, Lindsey Anderson, Angela Braga	V F
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2017 Outdoor Season

Glastonbury HS

9th Grade

100 Meters

10	14.03	Apr 8	12th Bloomfield Invitational	V P
3	13.89 SR	Apr 12	Vacation Invitational Relays	Fr F

200 Meters

36	28.51	May 6	Middletown Outdoor Track & Field Invite Varsity	V F
13	28.21 SR	May 20	36th Randy Smith Journal Inquirer Greater Manchester Invite	V F
19	28.27	May 23	CCC Central Region Track and Field Championship	V F
43	28.64 (-1.0)	May 31	CIAC CLASS LL OTF Championship	V F

Long Jump

9	15' 1.5	Apr 8	12th Bloomfield Invitational	V F
3	15' 4.5	Apr 12	Vacation Invitational Relays	V F
7	13' 9	Apr 22	Panther Invitational Track & Field Meet	V F
4	15' 10.5	Apr 28	Greater Bristol Invitational	V F
16	15' 6	May 6	Middletown Outdoor Track & Field Invite Varsity	V F

5	15' 10	May 13	86th Greater Hartford Outdoor Track and Field Invite	V F
1	16' 4.5	May 20	36th Randy Smith Journal Inquirer Greater Manchester Invite	V F
2	16' 6.5 SR	May 23	CCC Central Region Track and Field Championship	V F
10	15' 7	May 31	CIAC CLASS LL OTF Championship	V F

4x100 Relay

21	59.97	Apr 8	12th Bloomfield Invitational Selina Soule, Madison Seymour, Hana Lataille, Emily Kennedy	V F
2	51.64	Apr 12	Vacation Invitational Relays Selina Soule, Madison Seymour, Lindsey Anderson, Danielle Brinckman	V F
6	53.54	Apr 22	Panther Invitational Track & Field Meet Selina Soule, Hana Lataille, Emily Kennedy, Lindsey Anderson	V F
2	50.99	Apr 28	Greater Bristol Invitational Selina Soule, Madison Seymour, Lindsey Anderson, Danielle Brinckman	V F
2	51.20	May 6	Middletown Outdoor Track & Field Invite Varsity Selina Soule, Madison Seymour, Lindsey Anderson, Danielle Brinckman	V F

2	50.09	May 23	CCC Central Region Track and Field Championship Selina Soule, Madison Seymour, Lindsey Anderson, Danielle Brinckman	V F
10	50.47	May 31	CIAC CLASS LL OTF Championship Selina Soule, Madison Seymour, Lindsey Anderson, Danielle Brinckman	V F

2017 Indoor Season

Glastonbury HS

9th Grade

55 Meter Dash

8	8.04	Jan 10	Snowflake Invitational	V F
18	7.87 SR	Feb 15	CIAC Combined Class LL Championship	V P

300 Meters

19	48.60 SR	Dec 27	Jack Long Invitational	V F
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Long Jump

7	15' 5	Dec 27	Jack Long Invitational	V F
3	15' 3	Dec 29	Hillhouse Winter Relays	V F
2	15' 6 SR	Jan 10	Snowflake Invitational	V F
6	15' 3	Jan 13	McReavy Invitational	V F
5	14' 6.5	Jan 16	Frosh & Soph Meet	V F
7	15' 5.5	Jan 21	SCC Coaches Invitational	V F
11	14' 8.25	Jan 28	CCC Indoor TF Championships	V F
7	14' 9.5	Feb 15	CIAC Combined Class LL Championship	V F

4x200 Relay

4	1:50.57	Jan 28	CCC Indoor TF Championships Selina Soule, Danielle Brinckman, Julia Ostrowski, Lindsey Anderson	V F
3	1:50.16	Feb 15	CIAC Combined Class LL Championship Selina Soule, Danielle Brinckman, Julia Ostrowski, Lindsey Anderson	V F
11	1:50.13	Feb 20	CIAC Combined State Open Championship Selina Soule, Danielle Brinckman, Julia Ostrowski, Lindsey Anderson	V F

Exhibit D

 **Canton HS** Warriors - Collinsville, CT

 **Chelsea Mitchell Track & Field Bio**

2020 Indoor Season

 **Rankings**

2020 Indoor

Canton HS

12th Grade

55 Meter Dash

1	7.30	Dec 14	NCCC Development Meet	V F
1	7.39	Dec 27	Jack Long Invitational	V F
2	7.21	Jan 4	26th Hispanic Games	V P
--	DQ	Jan 4	26th Hispanic Games	V F
2	7.47	Jan 11	Shoreline Coaches Invite	V P
2	7.34	Jan 11	Shoreline Coaches Invite	V F
1	7.26	Feb 1	NCCC Indoor Track Championship	V P
1	7.19	Feb 1	NCCC Indoor Track Championship	V F
1	7.14 PR	Feb 8	NCCC Last Chance Qualifier	V F
2	7.35	Feb 14	CIAC Combined Class S Championships	V P
1	7.18	Feb 14	CIAC Combined Class S Championships	V F
1	7.24	Feb 22	CIAC Combined State Open Championships	V P
1	7.15	Feb 22	CIAC Combined State Open Championships	V F
4	7.32	Feb 29	33rd New England Interscholastic Championships	V P
3	7.24	Feb 29	33rd New England Interscholastic Championships	V F

200 Meters - 25.98

Team: 1st S: 1st CT: 1st
National: 171st

Long Jump - 19' 8.25"

Team: 1st S: 1st CT: 1st
National: 2nd

55 Meter Dash - 7.14

Team: 1st S: 2nd CT: 2nd
National: 41st

60 Meter Dash - 7.77

Team: 1st S: 1st CT: 1st
National: 78th

300 Meters - 40.98

Team: 1st S: 1st CT: 4th
National: 108th

 **Season Records**

55 Meter Dash

2017 Indoor	9	7.56
2018 Indoor	10	7.46 *
2019 Indoor	11	7.23 *
2020 Indoor	12	7.14 PR *

60 Meter Dash

2020 Indoor	12	7.77 PR
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100 Meters

60 Meter Dash

1	7.77 PR	Jan 25	Hillhouse Track Classic	V F	2017 Outdoor	9	12.32
					2018 Outdoor	10	12.26 *
					2019 Outdoor	11	11.67 PR *
200 Meters							
8	25.98 PR	Jan 4	26th Hispanic Games	V P	200 Meters		
300 Meters							
1	41.94	Jan 11	Shoreline Coaches Invite	V F	2017 Outdoor	9	26.01
2	42.54	Jan 15	Snowflake Invitational	V F	2018 Outdoor	10	25.53 *
3	41.70	Jan 25	Hillhouse Track Classic	V F	2019 Outdoor	11	24.79 PR *
					2020 Indoor	12	25.98 PR
1	41.60	Feb 1	NCCC Indoor Track	V F	300 Meters		
			Championship		2017 Indoor	9	42.25
1	40.98 PR	Feb 14	CIAC Combined Class S	V F	2018 Indoor	10	42.28
			Championships		2019 Indoor	11	42.74
4	41.52	Feb 22	CIAC Combined State	V F	2020 Indoor	12	40.98 PR *
			Open Championships		400 Meters		
Long Jump							
1	18' 4	Dec 14	NCCC Development Meet	V F	2018 Outdoor	10	1:03.42
					2019 Outdoor	11	1:00.28 PR *
1	18' 2	Dec 27	Jack Long Invitational	V F	Long Jump		
1	17' 6.75	Jan 11	Shoreline Coaches Invite	V F	2017 Outdoor	9	16' 4
1	17' 11	Jan 15	Snowflake Invitational	V F	2018 Indoor	10	16' 11.5 *
1	19' 1.5	Jan 25	Hillhouse Track Classic	V F	2018 Outdoor	10	17' 2 *
1	19' 8.25 PR	Feb 1	NCCC Indoor Track	V F	2019 Indoor	11	18' 8 *
			Championship		2020 Indoor	12	19' 8.25 PR *
1	18' 8.5	Feb 14	CIAC Combined Class S	V F	Triple Jump		
			Championships		2018 Outdoor	10	35' 10 PR
2	19' 0.75	Feb 22	CIAC Combined State	V F	2019 Indoor	11	33' 7.5 PR
			Open Championships		2019 Outdoor	11	35' 7
2	19' 2.5	Feb 29	33rd New England	V F	*Improvement		
			Interscholastic				
			Championships				
4x200 Relay							
18	1:53.54	Jan 11	38th YALE	8 F			
			INTERSCHOLASTIC				
			TRACK CLASSIC				
			Chelsea Mitchell, Julia Langou,				
			Maeve Balavender, Maya				
			Sutton-Hall				

4x400 Relay

11	4:29.27	Jan 11	38th YALE INTERSCHOLASTIC TRACK CLASSIC Maeve Balavender, Ava Dakin, Maya Sutton-Hall, Chelsea Mitchell	5 F
1	4:24.93	Feb 8	NCCC Last Chance Qualifier Julia Caputo, Maeve Balavender, Chelsea Mitchell, Maya Sutton-Hall	V F

2019 Outdoor Season

Canton HS

11th Grade

100 Meters

1	13.0h	Apr 9	HMTCA and Canton @ Coventry	1 F
1	12.83	Apr 16	Somers, Windsor Locks @ Canton	2 F
1	12.2h	Apr 23	Bolton, East Windsor @ Canton	1 F
1	12.48	May 1	East Granby, Classical Magnet @ Canton	V F
1	12.48	May 7	Canton, Granby, Innovation @ Suffield	V F
1	12.22	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V P
2	12.16	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
1	12.74	May 14	Rock vs Stafford and Canton @ Rockville	V F
1	12.02	May 21	NCCC Outdoor Track Championship	V P
1	12.02	May 21	NCCC Outdoor Track Championship	V F

1	12.14 (-1.4)	May 30	CIAC Combined Class S Championship	V P
2	12.02 (-.8)	May 30	CIAC Combined Class S Championship	V F
3	12.07 (1.9)	Jun 3	CIAC Combined State Open Championship	V P
1	11.67 (2.8) PR	Jun 3	CIAC Combined State Open Championship	V F
3	12.56 (-2.0)	Jun 8	74th New England Interscholastic Track and Field Championships	V P
1	12.20 (-.9)	Jun 8	74th New England Interscholastic Track and Field Championships	V F

200 Meters

1	27.57	Apr 2	Ellington, Canton, SMSA @ Canton	V F
1	25.1h	Apr 23	Bolton, East Windsor @ Canton	1 F
1	25.33	May 1	East Granby, Classical Magnet @ Canton	V F
1	26.56	May 7	Canton, Granby, Innovation @ Suffield	V F
2	24.88	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
1	25.33	May 21	NCCC Outdoor Track Championship	V F
2	24.79 (-2.4) PR	May 30	CIAC Combined Class S Championship	V F
4	25.24 (1.0)	Jun 3	CIAC Combined State Open Championship	V F
5	25.36 (-.7)	Jun 8	74th New England Interscholastic Track and Field Championships	V F

400 Meters

1	1:03.44	Apr 2	Ellington, Canton, SMSA @ Canton	V F
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1	1:00.28 PR	May 7	Canton, Granby, Innovation @ Suffield	V F
1	51.62a	May 14	Rock vs Stafford and Canton @ Rockville	V F

Long Jump

1	17' 11	Apr 2	Ellington, Canton, SMSA @ Canton	V F
1	17' 3	Apr 9	HMTCA and Canton @ Coventry	1 F
1	18' 0	Apr 16	Somers, Windsor Locks @ Canton	2 F
1	17' 10	Apr 23	Bolton, East Windsor @ Canton	1 F
1	18' 3	Apr 27	39th O'Grady Relays (Saturday)	1 F
1	18' 4	May 7	Canton, Granby, Innovation @ Suffield	V F
1	18' 7.5 PR	May 11	88th Greater Hartford Outdoor Track and Field Invite (Saturday)	V F
1	17' 0	May 14	Rock vs Stafford and Canton @ Rockville	V F
1	18' 7.5	May 21	NCCC Outdoor Track Championship	V F
1	18' 4	May 30	CIAC Combined Class S Championship	V F
2	18' 7	Jun 3	CIAC Combined State Open Championship	V F
6	17' 8.25 (1.8)	Jun 8	74th New England Interscholastic Track and Field Championships	V F

Triple Jump

1	35' 7 SR	Apr 2	Ellington, Canton, SMSA @ Canton	V F
1	34' 2	Apr 9	HMTCA and Canton @ Coventry	1 F
3	34' 2.25	Apr 27	39th O'Grady Relays (Saturday)	1 F

1 34' 7 May 14 Rock vs Stafford and V F
Canton @ Rockville

2019 Indoor Season

Canton HS

11th Grade

55 Meter Dash

1	7.48	Dec 8	NCCC Development Meet	V F
1	7.40	Jan 10	Wesleyan Qualifier 1	V F
1	7.39	Jan 12	Shoreline Conference Coaches Invitational	V P
1	7.31	Jan 12	Shoreline Conference Coaches Invitational	V F
1	7.37	Jan 19	NCCC Invitational	V F
1	7.39	Jan 29	NCCC Indoor Track Championship	V P
1	7.32	Jan 29	NCCC Indoor Track Championship	V F
1	7.44	Feb 2	NCCC Last Chance Invitational	V F
3	7.38	Feb 7	CIAC Combined Class S Championships	V P
2	7.27	Feb 7	CIAC Combined Class S Championships	V F
4	7.27	Feb 16	CIAC Combined State Open Championships	V P
3	7.23 SR	Feb 16	CIAC Combined State Open Championships	V F
8	7.30	Mar 2	New England Indoor Track & Field Championships	V P
8	7.32	Mar 2	New England Indoor Track & Field Championships	V F

300 Meters

1	44.24	Dec 8	NCCC Development Meet	V F
2	42.75	Dec 27	Jack Long Invitational	V F

1	43.34	Jan 15	Snowflake Invitational	V F
1	43.10	Jan 26	Bacon Academy Invitational	V F
1	42.74 SR	Jan 29	NCCC Indoor Track Championship	V F
--	DNS	Feb 7	CIAC Combined Class S Championships	V F

Long Jump

1	17' 8	Dec 8	NCCC Development Meet	V F
2	16' 9	Dec 27	Jack Long Invitational	V F
1	17' 4	Jan 10	Wesleyan Qualifier 1	V F
1	16' 9.25	Jan 12	Shoreline Conference Coaches Invitational	V F
1	17' 3	Jan 15	Snowflake Invitational	V F
1	17' 8.5	Jan 19	NCCC Invitational	V F
1	17' 9.5	Jan 26	Bacon Academy Invitational	V F
1	17' 2.5	Jan 29	NCCC Indoor Track Championship	V F
1	18' 8 SR	Feb 2	NCCC Last Chance Invitational	V F
1	17' 8.5	Feb 7	CIAC Combined Class S Championships	V F
1	18' 5.5	Feb 16	CIAC Combined State Open Championships	V F
12	17' 6.25	Mar 2	New England Indoor Track & Field Championships	V F

Triple Jump

1	33' 7.5 PR	Dec 27	Jack Long Invitational	V F
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4x200 Relay

1	1:50.66	Jan 12	Shoreline Conference Coaches Invitational Chelsea Mitchell, Kaylia Bailey, Brooke Shepard, Maya Sutton- Hall	V F
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1 1:49.33 Jan 26 Bacon Academy V F
 Invitational
 Kaylia Bailey, Chelsea Mitchell,
 Brooke Shepard, Maya Sutton-
 Hall

-- DQ Feb 7 CIAC Combined Class S V F
 Championships
 Kaylia Bailey, Maya Sutton-Hall,
 Brooke Shepard, Chelsea
 Mitchell

4x400 Relay

1 4:31.48 Feb 2 NCCC Last Chance V F
 Invitational
 Madeline Archangelo, Kaylia
 Bailey, Maya Sutton-Hall,
 Chelsea Mitchell

SMR 1600m

1 4:43.75 Jan 19 NCCC Invitational V F
 Kaylia Bailey, Maya Sutton-Hall,
 Chelsea Mitchell, Julia Caputo

2018 Outdoor Season

Canton HS

10th Grade

100 Meters

1 13.26 Apr 17 Canton, Windsor Locks at 1 F
 Suffield

1 12.73 Apr 24 Coventry and Ellington at V F
 Canton

3 12.88 Apr 27 3rd Greater Bristol V P
 Outdoor Track and Field
 Invite

3 12.94 Apr 27 3rd Greater Bristol V F
 Outdoor Track and Field
 Invite

1 12.1h May 3 Granby Memorial, V F
 Somers @ Canton

1	12.2h	May 8	East Granby, East Windsor @ Canton	V F
1	12.61	May 12	12th Irv Black HS Invitational	V P
1	12.65	May 12	12th Irv Black HS Invitational	V F
1	12.6h	May 17	Rockville vs. Canton and SMSA	V F
1	12.43	May 22	NCCC Championship	V P
1	12.37	May 22	NCCC Championship	V F
1	12.67 (-1.4)	May 31	CIAC State Class S Championship	V P
1	12.61 (-2.7)	May 31	CIAC State Class S Championship	V F
2	12.26 (1.5) SR	Jun 4	CIAC State Open Championship	V P
4	12.39 (1.0)	Jun 4	CIAC State Open Championship	V F
7	12.82 (-2.2)	Jun 9	New England Championship	V P
7	12.58 (-1.1)	Jun 9	New England Championship	V F

200 Meters

1	27.5h	Apr 17	Canton, Windsor Locks at Suffield	1 F
1	26.3h	May 3	Granby Memorial, Somers @ Canton	V F
2	26.21	May 12	12th Irv Black HS Invitational	V F
1	26.5h	May 17	Rockville vs. Canton and SMSA	V F
1	25.98	May 22	NCCC Championship	V F
1	25.53 (-1.2) SR	May 31	CIAC State Class S Championship	V F
10	25.62 (1.5)	Jun 4	CIAC State Open Championship	V F

400 Meters

1 1:03.42 SR Apr 24 Coventry and Ellington at V F
Canton

Long Jump

1 17' 2 SR Apr 17 Canton, Windsor Locks at 1 F
Suffield

2 16' 5.5 Apr 24 Coventry and Ellington at V F
Canton

2 16' 0.5 May 3 Granby Memorial, V F
Somers @ Canton

1 16' 1.5 May 8 East Granby, East V F
Windsor @ Canton

1 16' 7.5 May 17 Rockville vs. Canton and V F
SMSA

1 17' 2 May 22 NCCC Championship V F

-- DNS May 31 CIAC State Class S V F
Championship

Triple Jump

1 33' 7 Apr 17 Canton, Windsor Locks at 1 F
Suffield

2 35' 10 PR Apr 24 Coventry and Ellington at V F
Canton

1 34' 6.75 Apr 27 3rd Greater Bristol V F
Outdoor Track and Field
Invite

1 33' 10.5 May 3 Granby Memorial, V F
Somers @ Canton

1 32' 10.5 May 8 East Granby, East V F
Windsor @ Canton

4x100 Relay

1 51.41 Apr 27 3rd Greater Bristol V F
Outdoor Track and Field
Invite
Kaylia Bailey, Maya Sutton-Hall,
Madeline Archangelo, Chelsea
Mitchell

1	50.27	May 31	CIAC State Class S Championship Brooke Shepard, Maya Sutton- Hall, Madeline Archangelo, Chelsea Mitchell	V F
5	50.33	Jun 4	CIAC State Open Championship Kaylia Bailey, Maya Sutton-Hall, Madeline Archangelo, Chelsea Mitchell	V F
15	50.49	Jun 9	New England Championship Kaylia Bailey, Maya Sutton-Hall, Madeline Archangelo, Chelsea Mitchell	V F

4x400 Relay

2	4:24.19	May 12	12th Irv Black HS Invitational Madeline Archangelo, Jane Frawley, Maya Sutton-Hall, Chelsea Mitchell	V F
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2018 Indoor Season

Canton HS

10th Grade

55 Meter Dash

2	7.59	Dec 21	Old Saybrook Qualifier	V F
1	7.51	Jan 9	Snowflake Invitational	V F
3	7.56	Jan 13	SCC Coaches Invitational 2018	V P
4	7.51	Jan 13	SCC Coaches Invitational 2018	V F
1	7.70	Jan 20	NCCC Invitational	V F
1	7.51	Jan 30	NCCC Indoor Track Championship	V P
1	7.54	Jan 30	NCCC Indoor Track Championship	V F
1	7.54	Feb 3	NCCC Last Chance - NON-NCCC SCHOOLS	V F

3	7.50	Feb 10	CIAC Combined Class S Championship	V P
4	7.46 SR	Feb 10	CIAC Combined Class S Championship	V F
16	7.78	Feb 17	CIAC Combined State Open Championship	V P

300 Meters

2	44.93	Dec 21	Old Saybrook Qualifier	V F
2	44.24	Dec 27	Jack Long Invitational Meet	V F
1	44.08	Jan 20	NCCC Invitational	V F
7	42.28 SR	Jan 20	36th Yale Interscholastic Track & Field Classic	5 F
1	42.90	Jan 27	Bacon Academy Invitational	V F
1	42.64	Jan 30	NCCC Indoor Track Championship	V F
6	42.56	Feb 10	CIAC Combined Class S Championship	V F

Long Jump

4	15' 3	Dec 27	Jack Long Invitational Meet	V F
1	16' 8	Jan 20	NCCC Invitational	V F
3	16' 3	Jan 27	Bacon Academy Invitational	V F
1	16' 11.5 SR	Jan 30	NCCC Indoor Track Championship	V F
3	16' 2.5	Feb 3	NCCC Last Chance - NON-NCCC SCHOOLS	V F
5	16' 5	Feb 10	CIAC Combined Class S Championship	V F
15	15' 11	Feb 17	CIAC Combined State Open Championship	V F

4x200 Relay

19 1:52.02 Jan 20 36th Yale Interscholastic 8 F
 Track & Field Classic
 Maya Sutton-Hall, Brooke
 Shepard, Madeline Archangelo,
 Chelsea Mitchell

4x400 Relay

16 4:35.06 Jan 13 SCC Coaches Invitational V F
 2018
 Madeline Archangelo, Chelsea
 Mitchell, Maya Sutton-Hall,
 Jane Frawley

2017 Outdoor Season

Canton HS

9th Grade

100 Meters

1	12.3h	May 2	Bolton, Canton, e. Windsor	V F
1	13.31	May 4	Canton, Coventry, Ellington	V F
1	12.96	May 13	86th Greater Hartford Outdoor Track and Field Invite	V P
1	12.80	May 13	86th Greater Hartford Outdoor Track and Field Invite	V F
1	12.74	May 23	NCCC Championship	V P
1	12.89	May 23	NCCC Championship	V F
1	12.52 (1.6)	Jun 1	CIAC CLASS S OTF CHAMPIONSHIP	V P
2	12.32 (1.5) SR	Jun 1	CIAC CLASS S OTF CHAMPIONSHIP	V F
8	12.60 (1.4)	Jun 5	CIAC STATE OPEN OTF CHAMPIONSHIP	V P
7	12.69 (1.2)	Jun 5	CIAC STATE OPEN OTF CHAMPIONSHIP	V F
13	12.62 (7)	Jun 10	New England Outdoor Track and Field Championships	V P

14 12.46 (-1.7) Jun 18 New Balance Nationals FR P
Outdoor

200 Meters

1 26.8h May 2 Bolton, Canton, e. V F
Windsor

1 27.15 May 4 Canton, Coventry, V F
Ellington

3 26.40 May 13 86th Greater Hartford V F
Outdoor Track and Field
Invite

1 26.06 May 23 NCCC Championship V F

2 26.15 (5) Jun 1 CIAC CLASS S OTF V F
CHAMPIONSHIP

14 26.01 (1.2) SR Jun 5 CIAC STATE OPEN OTF V F
CHAMPIONSHIP

Long Jump

2 16' 4 SR May 2 Bolton, Canton, e. V F
Windsor

Triple Jump

-- DNS Jun 1 CIAC CLASS S OTF V F
CHAMPIONSHIP

4x100 Relay

1 50.82 May 13 86th Greater Hartford V F
Outdoor Track and Field
Invite
Madeline Archangelo, Amber
Harraden, Emily Mitchell,
Chelsea Mitchell

2 52.26 May 23 NCCC Championship V F
Elizabeth Raynor, Sophia
Langou, Emily Mitchell, Chelsea
Mitchell

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2	50.80	Jun 1	CIAC CLASS 5 OTF CHAMPIONSHIP Sofia Langou, Madeline Archangelo, Emily Mitchell, Chelsea Mitchell	V F
17	51.31	Jun 5	CIAC STATE OPEN OTF CHAMPIONSHIP Sofia Langou, Madeline Archangelo, Emily Mitchell, Chelsea Mitchell	V F

4x200 Relay

4	1:51.50	Apr 29	37th O'Grady Relays Sophia Langou, Madeline Archangelo, Emily Mitchell, Chelsea Mitchell	V F
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DMR 1200-400-800-1600m

13	13:41.65	Apr 29	37th O'Grady Relays Helena Winkler, Chelsea Mitchell, Abby Briggs, Jane Frawley	V F
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2017 Indoor Season

Canton HS 9th Grade

55 Meter Dash

3	7.71	Dec 27	Jack Long Invitational	V F
1	7.71	Jan 10	Snowflake Invitational	V F
2	7.70	Jan 14	Shoreline Conference Coaches Invitational	V P
2	7.67	Jan 14	Shoreline Conference Coaches Invitational	V F
1	7.58	Jan 21	2017 NCCC Invitational (rescheduled)	V F
2	7.64	Jan 28	Bacon Academy Invitational	V F
1	7.66	Feb 6	NCCC ITF Championship	V P
1	7.56 SR	Feb 6	NCCC ITF Championship	V F

300 Meters

4	44.55	Dec 27	Jack Long Invitational	V F
3	44.07	Jan 14	Shoreline Conference Coaches Invitational	V F
24	44.41	Jan 21	35th Yale Interscholastic Track and Field Classic	Ct F
1	43.20	Feb 6	NCCC ITF Championship	V F
3	42.25 SR	Feb 14	CIAC Combined Class S Championship	V F
15	43.38	Feb 20	CIAC Combined State Open Championship	V F

4x200 Relay

3	1:53.13	Jan 14	Shoreline Conference Coaches Invitational Sophia Langou, Emily Mitchell, Amber Harraden, Chelsea Mitchell	V F
10	1:51.32	Jan 21	35th Yale Interscholastic Track and Field Classic Sofia Langou, Emily Mitchell, Amber Harraden, Chelsea Mitchell	U600 F
1	1:52.35	Feb 6	NCCC ITF Championship Kaylia Bailey, Emily Mitchell, Madeline Archangelo, Chelsea Mitchell	V F
2	1:51.19	Feb 14	CIAC Combined Class S Championship Madeline Archangelo, Chelsea Mitchell, Emily Mitchell, Amber Harraden	V F
10	1:50.02	Feb 20	CIAC Combined State Open Championship Madeline Archangelo, Chelsea Mitchell, Emily Mitchell, Amber Harraden	V F

4x400 Relay

2	4:41.56	Jan 21	2017 NCCC Invitational (rescheduled) Abby Briggs, Jane Frawley, Amber Harraden, Chelsea Mitchell	V F
4	4:33.29	Jan 28	Bacon Academy Invitational	V F

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			Mitchell	
7	4:24.59	Feb 14	CIAC Combined Class S Championship Chelsea Mitchell, Madeline Archangelo, Abby Briggs, Amber Harraden	V F

SMR 1600m

2	4:41.49	Jan 10	Snowflake Invitational Emily Mitchell, Chelsea Mitchell, Abby Briggs, Jane Frawley	V F
7	4:54.45	Jan 28	Bacon Academy Invitational Chelsea Mitchell, Emily Mitchell, Amber Harraden, Abby Briggs	V F

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Exhibit E


Danbury HS **Hatters** - Danbury, CT

 **Alanna Smith** Track & Field Bio

2019 Outdoor Season

Danbury HS

9th Grade

 **Rankings**

2020 Indoor

100 Meters

1	13.14c	Apr 2	Danbury at Warde Coed	V F
1	13.09	Apr 6	43rd Hammonasset Freshman Invitational	F F
4	12.51 (1.1)	Apr 20	New York Relays	inv P
4	12.40 (.1)	Apr 20	New York Relays	inv F
1	12.64c	Apr 24	Danbury at Ludlowe Coed	V F
3	13.34c	Apr 29	Danbury, Westhill at Staples Girls	V F
1	12.64c	May 6	Danbury, Stamford at Trumbull CoEd	V F
6	12.45 (.0)	May 11	Glen Loucks Games	V P
3	12.28 (.0)	May 11	Glen Loucks Games	V F
1	12.61	May 14	Danbury at Ridgefield Girls	V F
1	12.26	May 21	FCIAC Combined Championships	V P
1	12.17	May 21	FCIAC Combined Championships	V F
1	12.41 (.1)	May 29	CIAC Combined Class LL Championship	V P
1	12.47 (-1.8)	May 29	CIAC Combined Class LL Championship	V F
4	12.11 (2.5)	Jun 3	CIAC Combined State Open Championship	V P
3	12.04 (2.8) PR	Jun 3	CIAC Combined State Open Championship	V F

200 Meters - 26.70

Team: 1st CT: 1st Region 1: 27th
 Northeast: 35th
 USATF Youth: 358th
 Youth Clubs: 419th

400 Meters - 1:01.12

Team: 1st CT: 3rd Region 1: 34th
 Northeast: 44th
 USATF Youth: 241st
 Youth Clubs: 285th

 **Season Records**

100 Meters

2019 Outdoor 9 12.04 PR *

200 Meters

2019 Outdoor 9 24.98 PR *

400 Meters

2019 Outdoor 9 55.49 PR *

*Improvement

200 Meters

1	26.08	Apr 6	43rd Hammonasset Freshman Invitational	F F
1	26.85	Apr 9	Central, Danbury at Greenwich Coed	V F
1	25.44c	Apr 24	Danbury at Ludlowe Coed	V F
1	26.94c	Apr 29	Danbury, Westhill at Staples Girls	V F
1	26.07	May 14	Danbury at Ridgefield Girls	V F
1	25.02 (4.1)	May 21	FCIAC Combined Championships	V F
1	24.98 (-1.5) PR	May 29	CIAC Combined Class LL Championship	V F
3	25.01 (1.0)	Jun 3	CIAC Combined State Open Championship	V F
3	25.02 (-.7)	Jun 8	74th New England Interscholastic Track and Field Championships	V F

400 Meters

1	1:00.84c	Apr 2	Danbury at Warde Coed	V F
1	59.56	Apr 6	43rd Hammonasset Freshman Invitational	F F
1	1:01.90	Apr 9	Central, Danbury at Greenwich Coed	V F
1	58.14c	Apr 24	Danbury at Ludlowe Coed	V F
1	58.64c	Apr 29	Danbury, Westhill at Staples Girls	V F
2	57.10	May 4	Middletown Outdoor Track and Field Invite Varsity	V F
1	58.64c	May 6	Danbury, Stamford at Trumbull CoEd	V F
3	55.94	May 11	Glen Loucks Games	V F
1	58.21	May 14	Danbury at Ridgefield Girls	V F

1	56.36	May 21	FCIAC Combined Championships	V F
1	55.56	May 29	CIAC Combined Class LL Championship	V F
1	55.71	Jun 3	CIAC Combined State Open Championship	V F
1	55.49 PR	Jun 8	74th New England Interscholastic Track and Field Championships	V F

4x200 Relay

2	1:47.64	Apr 27	39th O'Grady Relays (Saturday) Alanna Smith, Natalee Seipio, Jessica Glowacki, Meilee Kry	1 F
1	1:43.56	May 17	13th Annual Dream Invitational Alanna Smith, Natalee Seipio, Jessica Glowacki, Meilee Kry	V F
43	1:44.05	Jun 16	2019 New Balance Nationals Outdoor Alanna Smith, Meilee Kry, Briana Gilliard, Natalee Seipio	CH F

4x400 Relay

1	4:23.90	Apr 9	Central, Danbury at Greenwich Coed Meilee Kry, Jessica Glowacki, Alexandra Chakar, Alanna Smith	V F
5	4:25.40	Apr 27	39th O'Grady Relays (Saturday) Briana Gilliard, Jaylyn Carter, Da'Nae Sherman, Alanna Smith	1 F
5	3:59.86	May 11	Glen Loucks Games Meilee Kry, Daniella Grullon-Pena, Natalee Seipio, Alanna Smith	V F

4 3:58.00 Jun 8 74th New England V F
Interscholastic Track and
Field Championships
Briana Gilliard, Alanna Smith,
Jessica Glowacki, Natalee Seipio

SMR 100-100-200-400m

12 1:47.40 Jun 16 2019 New Balance CH F
Nationals Outdoor
Shanell Stewart, Emily Souza,
Jaylyn Carter, Alanna Smith

SMR 1600m

1 4:09.02 May 17 13th Annual Dream V F
Invitational
Alanna Smith, Natalee Seipio,
Meilee Kry, Daniella Grullon-
Pena

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Nationals Outdoor
Natalee Seipio, Meilee Kry,
Alanna Smith, Daniella
Grullon-Pena

Exhibit F

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**Immaculate** HS **Mustangs** - Danbury, CT **Ashley Nicoletti Track & Field Bio**

2019 Outdoor Season

Immaculate HS

9th Grade

Rankings

2019 Outdoor

100 Meters

1	13.61	May 6	Immaculate, Notre Dame-Ffld @ New Fairfield Boys & Girls	V F
	13.24c	May 14	Immaculate, Brookfield, Kolbe @ Joel Barlow Girls	V F
2	13.01 PR	May 16	Bethel Freshman Invitational	F F
10	13.11	May 22	SWC Outdoor Track and Field Championship	V P
9	13.27 (-1.4)	May 30	CIAC Combined Class S Championship	V P

100 Meters - 13.11

Team: 2nd S: 15th CT: 89th

National: 8564th

200 Meters - 26.78

Team: 1st S: 9th CT: 47th

National: 5847th

High Jump - 4' 10"

Team: 1st S: 11th CT: 48th

National: 5065th

Long Jump - 14' 11"

Team: 2nd S: 35th CT: 199th

National: 14896th

200 Meters

	27.54c	Apr 9	Immaculate, New Milford @ Bunnell Girls	V F
	28.04c	Apr 23	Immaculate, Newtown, Stratford @ Pomperaug Girls	V F
	26.94c	Apr 30	Immaculate, Bethel, Masuk @ Weston Girls	V F
1	27.05	May 3	Middletown Outdoor Track and Field Invite Frosh-Soph	FS F
	26.84c	May 14	Immaculate, Brookfield, Kolbe @ Joel Barlow Girls	V F
3	27.04	May 16	Bethel Freshman Invitational	F F

Season Records

100 Meters

2019 Outdoor **9** 13.01 PR

200 Meters

2019 Outdoor **9** 26.78 PR

100m Hurdles - 33"

2019 Outdoor **9** 18.44c PR

Shot Put - 4kg

2019 Outdoor **9** 24' 9 PR

High Jump

2019 Outdoor **9** 4' 10 PR

7	26.78 PR	May 22	SWC Outdoor Track and Field Championship	V F	Long Jump		
					2019 Outdoor	9	15' 7 PR
13	27.41 (-2.4)	May 30	CIAC Combined Class S Championship	V F			
					*Improvement		

100m Hurdles - 33"

	18.44c PR	Apr 30	Immaculate, Bethel, Masuk @ Weston Girls	V F			
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Shot Put - 4kg

	24' 9 PR	May 6	Immaculate, Notre Dame-Ffld @ New Fairfield Boys & Girls	V F			
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High Jump

	4' 8	Apr 9	Immaculate, New Milford @ Bunnell Girls	V F			
	4' 8	Apr 23	Immaculate, Newtown, Stratford @ Pomperaug Girls	V F			
	4' 8	Apr 30	Immaculate, Bethel, Masuk @ Weston Girls	V F			
2	4' 10 PR	May 3	Middletown Outdoor Track and Field Invite Frosh-Soph	FS F			
	4' 4	May 6	Immaculate, Notre Dame-Ffld @ New Fairfield Boys & Girls	V F			
22	4' 6	May 11	Glen Loucks Games	V F			
72	4' 8	May 16	Bethel Freshman Invitational	F F			
12	4' 6	May 22	SWC Outdoor Track and Field Championship	V F			
--	NH	May 30	CIAC Combined Class S Championship	V F			

Long Jump

	15' 0	Apr 9	Immaculate, New Milford @ Bunnell Girls	V F			
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