

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

A.C., a minor child by his next friend,)
mother and legal guardian, M.C.,)
)
Plaintiff,)
)
v.) No. 1:21-cv-02965-TWP-MPB
)
METROPOLITAN SCHOOL DISTRICT)
OF MARTINSVILLE, *et al.*,)
)
Defendants.)

Plaintiff's Preliminary Witness and Exhibit Lists

Plaintiff, by counsel, files his preliminary witness and exhibit lists as required by the approved case management plan in this cause.

Preliminary Witness List

1. Plaintiff A.C., who may be contacted in care of his counsel.
2. M.C., the plaintiff's mother and next friend, who may be contacted in care of Plaintiff's counsel.
3. J.C., the plaintiff's stepfather, who may be contacted in care of Plaintiff's counsel. This individual is being identified by initials in order to preserve the confidentiality of the identities of A.C. and M.C., as the defendants are aware of the identity of J.C.
4. Fred Kutruff, Principal, John R. Wooden Middle School, who may be contacted in the care of Defendants' counsel.
5. As yet unidentified employees of the Metropolitan School District of Martinsville, who may be contacted in care of Defendants' counsel.

6. Dr. Dennis Fortenberry, who may be contacted in care of Plaintiff's counsel.
7. As yet unidentified employees of the Riley Gender Health program who have knowledge of the Plaintiff's diagnosis and treatment. Riley Gender Health Program, 410 W. 10th St., Indianapolis, IN 46202.
8. Individuals employed by GenderNexus. 3733 N. Meridian St. Ste. 310, Indianapolis, IN 46208.
9. Doug Reynolds, a social worker at John R. Wooden Middle School, who may be contacted in care of Defendants' counsel.
10. Other health care providers as the Plaintiff's care and discovery continues.
11. Individuals named in the defendants' initial disclosures and any future witness lists.
12. Any witnesses needed for identification or authentication of documents or needed for impeachment or rebuttal; and
13. Further witnesses identified as discovery continues.

Preliminary exhibit list

1. Any documents produced by the defendants, including those already produced at MSD_MARTINSVILLE_000001-000024.
2. Deposition transcripts and their exhibits.
3. The declaration of A.C., with exhibits, previously filed in this case (ECF No., 29-3);
4. The declarations of M.C., with exhibits, previously filed in this case (ECF No. 3-1; 29-2);
5. The declaration of J. Dennis Fortenberry, previously filed in this case (ECF No. 29-1);
6. All other depositions taken in this matter and their exhibits;
7. All stipulations and responses to requests for admissions;

8. The complaint and answer to the complaint in this cause and any amended complaints and answers to any amended complaints;
9. The motion for a preliminary injunction, response to the motion for preliminary injunction, and reply in support of preliminary injunction;
10. All affidavits and verified documents filed in this cause;
11. All medical records of plaintiff;
12. Documents identified in the defendants' initial disclosures and any exhibit lists;
13. Documents and responses produced by the defendants in response to the plaintiff's discovery requests; and
14. Any documents needed for impeachment or rebuttal purposes.
15. Further documents identified during discovery.

Kenneth J. Falk
Stevie J. Pactor
ACLU of Indiana
1031 E. Washington St.
Indianapolis, IN 46202
317/635-4059
fax: 317/635-4105
kfalk@aclu-in.org
spactor@aclu-in.org

Megan Stuart
Indiana Legal Services
214 S. College Ave., 2nd Floor
Bloomington, IN 47404
812/961-6902
Megan.stuart@ils.net

Kathleen Bensberg
Indiana Legal Services, Inc.
1200 Madison Ave.

Indianapolis, IN 46225
317/631-9410
fax: 317/269-7219
Kathleen.bensberg@ilsi.net

Attorneys for Plaintiff