

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF PENNSYLVANIA

3 KHADIDJA ISSA, ET AL) 5:16-cv-03881-EGS
4) AM SESSION
5 VS.)
6) August 22, 2016
7 THE SCHOOL DISTRICT OF) Easton, Pa
8 LANCASTER) 9:27 a.m.-12:34 p.m.

9 HEARING ON PRELIMINARY INJUNCTION
10 BEFORE THE HONORABLE EDWARD G. SMITH,
11 UNITED STATES DISTRICT JUDGE

12 APPEARANCES:

13 For Plaintiffs: ERIC J. ROTHSCHILD, ESQ.
14 KATHLEEN A. MULLEN, ESQ.
15 PEPPER HAMILTON LLP
16 18th and Arch Streets
17 3000 Two Logan Square
18 Philadelphia, PA 19103

19 KRISTINA MOON, ESQ.
20 MAURA L. MCINERNEY, ESQ.
21 EDUCATION LAW CENTER
22 1315 Walnut Street
23 Suite 400
24 Philadelphia, PA 19107
25 MOLLY M. TACK-HOOPER, ESQ.
ACLU OF PENNSYLVANIA
P. O. Box 60173
Philadelphia, PA 19102

WITOLD J. WALCZAK, ESQ.
ACLU OF PENNSYLVANIA-
PITTSBURGH CHAPTER
313 Atwood Street
Pittsburgh, PA 15213
Philadelphia, PA 19103

Veritext National Court Reporting Company
Mid-Atlantic Region
1801 Market Street - Suite 1800
Philadelphia, PA 19103
1-888-777-6690

Page 2

1 APPEARANCES, CONTD:
 2 For the Defendant: SHARON O'DONNELL, ESQ.
 MARSHALL, DENNEHEY,
 3 WARNER COLEMAN & GOGGIN
 100 Corporate Center Dr.
 4 Suite 201
 Camp Hill, PA 17011
 5
 ECRO: JAIME KULICK
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23 Veritext National Court Reporting Company
 Mid-Atlantic Region
 24 1801 Market Street – Suite 1800
 Philadelphia, PA 19103
 25 1-888-777-6690

Page 3

1 INDEX
 2 WITNESS DIRECT CROSS REDIRECT RECROSS
 3 JACK BLACKMAN 5 16 49 53
 4 AURA HEISEY 69 93
 5
 6
 7
 8 EXHIBITS
 9 NO. PAGE
 10 None
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 4

1 PROCEEDINGS
 2 THE CLERK: All rise.
 3 (Call to Court)
 4 THE COURT: Good morning, you may be
 5 seated, thank you. The Court is called to order. All
 6 parties previously present are once again present.
 7 When we recessed on Friday, we were in
 8 the midst of the defendant's case. Attorney
 9 O'Donnell, good morning, you may --
 10 MS. O'DONNELL: Good morning, Your
 11 Honor.
 12 THE COURT: Good morning. You may call
 13 your next witness.
 14 MS. O'DONNELL: Thank you. Your Honor,
 15 I'd like to call to the stand Jack Blackman.
 16 THE COURT: Good morning, sir.
 17 THE CLERK: Please remain standing and
 18 raise your right hand.
 19 JACK BLACKMAN, WITNESS, SWORN
 20 THE COURT: Thank you very much, sir.
 21 And, sir, please be seated. And, sir, would you
 22 please state your full name, spelling your last name
 23 for the record.
 24 THE WITNESS: Yes. My God given name
 25 is Jacques Blackman, B-l-a-c-k-m-a-n.

Page 5

1 THE COURT: Thank you very much, sir.
 2 Counselor, you may proceed.
 3 MS. O'DONNELL: Thank you very much.
 4 DIRECT EXAMINATION
 5 BY MS. O'DONNELL:
 6 Q. Good morning, Mr. Blackman.
 7 A. Good morning.
 8 Q. Would you give us a brief description of
 9 your educational background, please?
 10 A. Yes, ma'am. I got my bachelors in education
 11 from Millersville University. I went on to get my
 12 masters in counseling from Millersville University. I
 13 then got my principal certification from Widener's
 14 University, and I'm roughly six or seven courses away
 15 from doctorate from Widener University.
 16 Q. Very good. Are you presently employed?
 17 A. Yes.
 18 Q. And where are you employed?
 19 A. By the School District of Lancaster.
 20 Q. And how long have you been employed by the
 21 School District of Lancaster?
 22 A. Wednesday starts my thirty-first year in the
 23 School District of Lancaster.
 24 Q. What is your current position with the
 25 school district?

Page 6

1 A. My current position is coordinator of
 2 counseling and dropout prevention.
 3 Q. Coordinator of counseling and dropout
 4 prevention. What did you do before that?
 5 A. I was -- I started in the district as a home
 6 and school visitor, I did that for two years. I was a
 7 middle school counselor for nine years, and then I
 8 went on to become a high school counselor. And I was
 9 also a small learning community facilitator for two
 10 years before I went into this current position.
 11 Q. What does it mean to be a small learning
 12 community facilitator?
 13 A. It's a quasi-system principal of a small
 14 cohort of students. I had the college preps small
 15 learning community that I was in charge of. That was
 16 in the days after the district got the big grant from
 17 the Gates Foundation when we first reformed the high
 18 school to go into small learning communities.
 19 Q. Was there anything else that was formed
 20 through the Gates Foundation Fund or the scholarship
 21 that you were able to do?
 22 A. Yeah, at the time when the Gates Foundation
 23 came in, they reorganized the high school into nine
 24 small learning communities, and that was the advent of
 25 the original international school, which at that time

Page 7

1 was sixth grade through twelfth grade.
 2 Q. And tell us a little bit about the
 3 international school as you had it developed?
 4 A. At that time -- I didn't have it developed.
 5 The director of secondary education who had come here
 6 had developed it, but the idea of that international
 7 school was to really accelerate their learning.
 8 They did a lot of great activities
 9 culturally. Every Friday there was a different
 10 country represented. It would be a theme, and they
 11 would have -- everyone enjoyed it because there would
 12 be a luncheon every Friday. So it might be Dominican
 13 week, it might be people from Mexico, or anywhere in
 14 France, so they represented different countries.
 15 And then at the end of the year, they had
 16 American AFS -- it was the American Foreign Service I
 17 believe, and it was a big events with dancing, food,
 18 and skits from represented countries.
 19 Q. Do you have that available now in the
 20 international school?
 21 A. No. The Gates money went away after three
 22 years. And after that, they had to start cutting back
 23 on a lot of their programming that was there. And
 24 then with the accountability from the state about
 25 graduation rates needing to improve, so the program

Page 8

1 was then redesigned to become more academically
 2 focused, it's not as much socially focused.
 3 And I do think part of what some members of
 4 the community might have been looking for in
 5 romanticizing might be the word, is that international
 6 experience that we had going for those three years
 7 back in, I would say it was 2001, 2002 and 2003.
 8 Q. That no longer exists.
 9 A. That no longer exists.
 10 Q. So what does the international school look
 11 like now? Is it any different from the Phoenix
 12 Academy and their program?
 13 A. No. The only difference would be that the
 14 Phoenix Academy is for students who are trying to
 15 recover credits, but the actual program at McCaskey is
 16 the same as all other small learning communities that
 17 McCaskey has.
 18 Q. What about the age of the students at the
 19 international school versus the age of the students at
 20 Phoenix?
 21 A. The age of the international school at
 22 McCaskey, they are the same age as the other high
 23 school students. All the students who are coming in
 24 who need credit recovery end up in Phoenix because of
 25 their lack of credits.

Page 9

1 Q. And what about 18 and 19-year olds or higher
 2 at McCaskey. Do you see any of them?
 3 A. No. In fact, three years ago we did a look
 4 at our graduating class, and what was going on with
 5 some of our dropouts, and we found 87 percent of our
 6 graduates are 18 years old. Another 10 percent of
 7 them were 17 years old at the time of graduation. The
 8 rest, very few ninth graders graduate from McCaskey.
 9 And --
 10 Q. Did you say very few ninth graders?
 11 A. 19-year olds, I'm sorry.
 12 Q. Okay.
 13 A. One of the things that I think that I heard
 14 on Friday, that I thought I should interject is the
 15 Pennsylvania Inter-Athletic Commission says 19-year
 16 olds cannot participate in sports at the high school
 17 level.
 18 Q. So let's talk a little bit about that. With
 19 respect to the extracurricular opportunities that
 20 exist at McCaskey, do those same opportunities exist
 21 at Phoenix?
 22 A. Yes, the opportunities are there for them as
 23 -- but if it becomes an inter-scholastic sport, they
 24 have to be under 19 years old to participate. But the
 25 opportunity is there, there's a bus that leaves

Page 10

1 Phoenix every day that goes over to the campus, for
 2 anyone who wants to partake in those things. And also
 3 there's a bus that goes back to McCaskey because
 4 McCaskey is the hub of the transportation. So the Red
 5 Rose Transit Authority has buses that disburses
 6 students from McCaskey throughout the city if they are
 7 outside of the two mile radius.
 8 Q. Okay. So there's busing back and forth
 9 between McCaskey and Phoenix for extra-curricular
 10 activities, but I think what you're saying is that
 11 there's also busing available through the Red Rose
 12 Transit Authority to provide transportation from
 13 McCaskey to wherever the children live in the city.
 14 A. If they're outside the two mile radius.
 15 Q. Okay. I want to go back and talk a little
 16 bit about your job title currently as the director of
 17 counseling and dropout prevention, and I'd like to
 18 break that down a little bit.
 19 What do you do in your position as director
 20 of counseling?
 21 A. I hire counselors for the district. We're
 22 in need of two of them currently. I also work with
 23 principals to observe them and supervise them to make
 24 sure that their practice is up to par. We do
 25 observations of them to make sure they are working

Page 11

1 hard with students to get them to meet the standards
 2 and prepare them for graduation.
 3 We also do professional development with
 4 them two times a year to make sure they stay current
 5 with their practice.
 6 Q. And is that true, is there a different
 7 standard in terms of your oversight of the counselors
 8 at Phoenix?
 9 A. No, they participate in our professional
 10 development activities.
 11 Q. And what would be the case, or can you
 12 describe to us that piece of your job responsibilities
 13 that involve dropout prevention?
 14 A. So the dropout prevention piece is we look
 15 at best practices from the nation about trying to get
 16 more students to graduate on time. We've looked at
 17 and gone to different workshops to really look at what
 18 causes students not to get to graduation.
 19 And so we've really looked at our own data
 20 internally to see which students are not making it to
 21 graduation. And we do work hard to make individual
 22 decisions on students to what is the best opportunity
 23 for them to graduate.
 24 Q. Okay. Now, with respect to your oversight -
 25 - strike that. Does placement of students in one

Page 12

1 school or the other fall under the umbrella of either
 2 dropout prevention or counseling?
 3 A. Yes.
 4 Q. Okay. And how so?
 5 A. The students that we review their credit, so
 6 it's kind of a combination of students are assigned to
 7 grade levels based on the number of credits that they
 8 have earned previously from other places when they
 9 arrive at our district or if they get promoted from
 10 eighth to ninth grade, then they have zero credits and
 11 that starts their high school timeclock towards
 12 graduation.
 13 Q. What about a child who comes in at age 17
 14 when that person's peers have already graduated, what
 15 do you do with someone like that?
 16 A. We really try to meet with them to determine
 17 what is the best possible path to get them to
 18 graduation.
 19 Q. And what if they have no credits?
 20 A. They have to be in ninth grade and we try to
 21 get them to go to the Phoenix Academy so they can
 22 accelerate their credits there.
 23 Q. Now, you said we try to get them to go, as
 24 opposed to telling them to go?
 25 A. We assign them there.

Page 13

1 Q. Okay.
 2 A. We tell them that is the best academic
 3 placement for them, so.
 4 Q. Have you ever had a child say I don't want
 5 to go to Phoenix?
 6 A. We've had students say they don't want to
 7 go, we talk with them and their parents. The older
 8 they are, the more we talk with the student and not
 9 the parent because when you turn 18, you're legally
 10 making decisions for yourself. And we really try to
 11 get them to understand that it's important to get a
 12 high school diploma, because I personally believe from
 13 my experiences that getting a high school diploma is
 14 the gateway to future opportunities.
 15 Q. Do you know whether or not there are any
 16 regulations in the State of Pennsylvania about
 17 compulsory attendance in public school?
 18 A. Yes, you have to be in school by eight years
 19 old, and you can leave and exit school on your own at
 20 the age of 17.
 21 Q. Okay. So these are kids -- so the kids in
 22 this lawsuit, 17 -- ages 17 to 21 would be outside the
 23 scope of compulsory attendance?
 24 A. That is correct.
 25 Q. Okay. So when you're having your

Page 14

1 conversations with the older students, the ones that
 2 are aged 17 to 21, what types of things do you discuss
 3 with them in terms of the curriculum and the extra-
 4 curricular activities at both schools?
 5 A. We start out talking about the academic
 6 components, how do we get them a high school diploma
 7 before their clock runs out. That's the most
 8 important piece of the conversation.
 9 There are times when others want to talk
 10 about athletic opportunities, and we go through the
 11 process of that with them. Students who come in with
 12 zero credits initially would have to be cleared by our
 13 athletic director to make sure that they are legal and
 14 under 19 years old to participate in activities, but
 15 we do give them that information.
 16 If they come with a history, a couple of
 17 years ago, we had brothers who came from Chester,
 18 Pennsylvania who are known for their basketball there.
 19 Their mother was anxious to get them going and meet
 20 the basketball coach and that sort of thing, but they
 21 had to go through the athletic director.
 22 We try to really get kids to be involved in
 23 as many activities as they can, but the focus has to
 24 be on getting to graduation first.
 25 Q. And then, what about the home language

Page 15

1 surveys, is that something that you already receive or
 2 that you have in your hands before you actually sit
 3 down with the students?
 4 A. We often get copies of their enrollment
 5 paperwork, and we review that. If they have enough
 6 credits to be placed in another grade, other than
 7 ninth grade if they have come in with 11 credits, we
 8 can assign to eleventh grade at McCaskey, depending on
 9 how many credits they come in to our district with.
 10 Q. I see. Do you have any students who come to
 11 you with concerns about having English language
 12 support?
 13 A. Yes.
 14 Q. And how do you handle those conversations?
 15 A. Well, we try to get -- I always include Ms.
 16 Hilt in those conversations because that's her area of
 17 expertise. We try to get them into the best academic
 18 placement that we can, so they can get on track for
 19 graduation.
 20 Q. Are you aware of whether there's any
 21 differences in the academic -- pardon me, the English
 22 language supports through academics at McCaskey and
 23 Phoenix?
 24 A. They're the same.
 25 Q. Okay. Do you know what the purpose of the

Page 16

1 public school education in Pennsylvania is?
 2 A. Yes, I do.
 3 Q. And what is that?
 4 A. Is to get as many students graduated as
 5 possible.
 6 MS. O'DONNELL: Those are all the
 7 questions I have, thank you.
 8 THE COURT: Thank you very much,
 9 Counselor. Mr. Rothschild, will you be cross-
 10 examining the witness?
 11 MR. ROTHSCHILD: Yes, Your Honor.
 12 THE COURT: Very well, you may proceed,
 13 sir.
 14 CROSS-EXAMINATION
 15 BY MR. ROTHSCHILD:
 16 Q. Good morning, Dr. -- Mr. Blackman.
 17 A. Good morning.
 18 Q. Doctor soon?
 19 A. I'm not sure it's going to happen. I still
 20 have two kids to get through, so I'm not worried about
 21 my education now, just more important about theirs.
 22 Q. The rule you described about being, was it
 23 19 and under, or under the age of 19 to play sports?
 24 A. You can't be 19 and play sports in
 25 Pennsylvania.

Page 17

1 Q. Okay. That -- there's no rule like that for
 2 theatre, newspaper, or yearbook or any of the other
 3 activities, right?
 4 A. No.
 5 Q. You just testified I think twice actually in
 6 response to Ms. O'Donnell's questions that the
 7 programs for teaching English language at Phoenix and
 8 McCaskey are the same, right?
 9 A. Yes.
 10 Q. That was your testimony, right?
 11 A. Yes.
 12 Q. That's not actually your area of expertise,
 13 is it?
 14 A. No, it's not.
 15 Q. And you actually don't know that that's so,
 16 do you, that they're the same?
 17 A. I believe they're the same.
 18 Q. Okay. Do you remember I took your
 19 deposition I think it's two weeks ago now on August
 20 8th?
 21 A. I remember.
 22 MR. ROTHSCHILD: May I approach, Your
 23 Honor?
 24 THE COURT: Certainly, Counselor.
 25 Q. I'm going to hand you your deposition

Page 18

1 transcript --

2 A. Okay.

3 Q. -- and I'll ask you some questions about

4 page 41 and 42.

5 Mr. Blackman, if you could look on the

6 right-hand quadrant -- bottom quadrant of page 41, are

7 you there?

8 A. Yes, I see it.

9 Q. Okay. And I asked you the question,

10 "Mr. Blackman, do you know what the

11 difference are in the delivery of English language

12 learning between Phoenix and McCaskey."

13 Do you see that?

14 A. Yes.

15 Q. And what did you answer?

16 A. I said,

17 "That was not my area of expertise."

18 Q. Can you read the full answer?

19 A. "No, that's not my area of expertise."

20 Q. Thank you. Refugee students and immigrant

21 students are not the majority of the students who are

22 placed at Phoenix, right?

23 A. That's correct.

24 Q. And actually most students that end out

25 attending Phoenix start out in the Lancaster School

Page 19

1 District schools and go to McCaskey before they go to

2 Phoenix, right?

3 A. That's correct.

4 Q. I think you estimated at the deposition

5 maybe 75 to 80 percent.

6 A. I don't recall the exact number I said then,

7 but.

8 Q. Does that sound right?

9 A. It's probably closer to 85 than 80.

10 Q. Okay. 85 percent, thank you.

11 And for them, placement at Phoenix is the

12 result of a request by the student's family and

13 requires -- and involves the agreement by the

14 student's family that those students will switch from

15 McCaskey to Phoenix, right?

16 A. Yes.

17 Q. And then you might not --

18 A. I don't approve all the requests that go to

19 Phoenix.

20 Q. But I'm correct that in terms of how those

21 students end out in Phoenix, agreement by the family

22 is one component?

23 A. Yes.

24 Q. Okay. Not true for the immigrant and

25 refugee students who come to the school district age

Page 20

1 17 or older, right?

2 A. Not true for 17 and older students, refugee

3 or not refugee.

4 Q. Who have come from outside the district and

5 started at that age in the school district.

6 A. Correct.

7 Q. For those, you make the decision for them.

8 A. Correct.

9 Q. Okay. You understand that all students who

10 have not reached their age of 21 when a school

11 semester starts have a right to a free public

12 education, don't you?

13 A. They have a right to a free public

14 education, correct.

15 Q. And that --

16 A. The district reserves the right for

17 placement.

18 Q. And that's true regardless of whether they

19 will have -- will be able to accumulate enough credits

20 to graduate; is that right?

21 A. That is what the law says, correct.

22 Q. And have you always known that since you've

23 been in this role of director of counseling and

24 dropout prevention?

25 A. Yes. I also know that students without a

Page 21

1 high school diploma or equivalency are going to really

2 dead end, for lack of a better term, I can't think of

3 a better term there is probably one, forgive me for

4 not using it, because they won't walk away with the

5 diploma, and I think that's not opening doors for

6 them, moving forward.

7 Q. Okay. But you're not saying that just

8 because that may be true of some students, that they

9 would just never -- they just don't have time to

10 accumulate enough credits. You're not saying that's a

11 reason that you can deny them enrollment that they

12 have sought in Lancaster School District?

13 A. Correct.

14 Q. But you've admitted that did happen for

15 Alembe Dunia, right?

16 A. Alembe?

17 Q. Yes.

18 A. Is that the student who didn't enroll in the

19 district? He was not denied. I never met with him.

20 Q. So when the school district admitted in its

21 answer to the complaint that initiated this lawsuit

22 that he had been denied enrollment because he was an

23 age where he couldn't accumulate enough credits,

24 you're not aware of that admission?

25 A. No, I never met with that student, never had

Page 22

1 an opportunity to discuss anything with him.
 2 What I remember about him is he didn't show
 3 up for an appointment.
 4 Q. Mr. Blackman, could you look at Exhibit 83
 5 and this will be in the second day binder?
 6 A. What was that tab again, please?
 7 Q. 83. Are you there?
 8 A. Yep.
 9 Q. And do you recognize this a string of e-
 10 mails that was initiated by a case worker named Balahl
 11 Altiemy to Amber Hilt, and that you eventually got
 12 copied on.
 13 A. Yep.
 14 Q. And this is about a particular student named
 15 Khadidja Issa, right?
 16 A. I don't know. I didn't know that when I
 17 answered the e-mail, if that's what you're getting to,
 18 but according to this it is, yes.
 19 Q. Right. And you actually -- the version of
 20 this e-mail that you're looking at you didn't answer
 21 at all, right, and I'm not suggesting you should, but
 22 if you want to take a minute to look at it.
 23 A. You want me to start where at the top?
 24 Q. Well, the first e-mail in the sequence
 25 starts at the bottom -- is actually on the third page

Page 23

1 as e-mails are generally printed out.
 2 A. Okay.
 3 Q. All right. And obviously as we just
 4 discussed, the first e-mail you're not included on,
 5 but you quickly become included on the exchange
 6 between Ms. Hilt and Mr. Altiemy, right?
 7 A. Yes.
 8 Q. And once you were copied, you could see that
 9 this was a particular student named Khadidja Issa,
 10 right?
 11 A. Yes.
 12 Q. And you understood that, and I'll use the
 13 word -- Balahl may be easier to pronounce than his
 14 last name, that Balahl was asking questions about her
 15 enrollment, right?
 16 A. My mistake here was I didn't read the e-
 17 mail. That was my mistake when I responded to Ms.
 18 Hilt.
 19 Q. Okay. And, Mr. Blackman, I appreciate that
 20 there's a response that you ultimately made to this e-
 21 mail that we'll talk about, but I want to focus first
 22 on -- and I appreciate that that was an inadvertent
 23 circulation of that e-mail to Balahl, but I'm not
 24 ready to ask you questions about that. You'll have
 25 the opportunity.

Page 24

1 I want to talk to you about the substance
 2 here of what Balahl was raising on behalf of Khadidja,
 3 okay?
 4 A. Right. And I also don't remember seeing
 5 Khadidja. I think I testified to that also.
 6 Q. Okay. So let me try it this way. There's a
 7 series of back and forth between Balahl and Amber Hilt
 8 about Khadidja, and then at the top e-mail, which is
 9 the last one in the sequence for -- that you see here,
 10 Ms. Hilt has a description for how a student like
 11 Khadidja would eventually end up in school at the
 12 Lancaster School District, right?
 13 A. Yes.
 14 Q. Okay. And, Mr. Blackman, I'm not sure about
 15 what you actually mean about not seeing this e-mail
 16 prior, but you've familiarized yourself with this e-
 17 mail as a result of this litigation, haven't you?
 18 A. Not really.
 19 Q. Okay. So Ms. Hilt in that top line e-mail
 20 says --
 21 A. Where are you now?
 22 Q. The top e-mail, so the one on January 21st,
 23 2016 --
 24 A. "Thanks for clarifying," starts there?
 25 Q. Okay. Well, this is actually --

Page 25

1 sequentially would be the last e-mail in this exchange
 2 as it goes back and forth, right?
 3 A. Gotcha.
 4 Q. And what Ms. Hilt says on the fourth
 5 paragraph down is that a student is not enrolled if
 6 he/she has provided records to enrollment, the next
 7 step is the meeting that occurred with Mr. Blackman,
 8 and as you stated, enrollment did not occur based on
 9 his assessment of the components I listed below.
 10 Now, I want to for a second step away from
 11 Khadidja's case and just ask you, is Ms. Hilt
 12 correctly reporting at Balahl the process by which a
 13 student becomes enrolled in the Lancaster School
 14 District?
 15 A. No, I think that's probably, if you were to
 16 ask her, I think that might be a typo, but I can't
 17 speak for her.
 18 Q. Well, what is she --
 19 A. But that's not the process.
 20 Q. Okay. What is she getting wrong about a
 21 student becoming enrolled in the School District of
 22 Lancaster?
 23 A. This says a student is not enrolled if she's
 24 provided records to enrollment.
 25 Q. And you disagree with that?

Page 26

1 A. Yes.

2 Q. Okay. And so your position is that once the

3 student has successfully submitted the right papers to

4 enrollment, she's enrolled?

5 A. They are -- they have been cleared to

6 determine placement.

7 Q. Okay. So -- and so placement is the next

8 step.

9 A. Yes.

10 Q. Okay. And placement has to occur in the way

11 Ms. Hilt said here, the way she said, the next step is

12 the meeting with Mr. Blackman, and again, I don't want

13 to focus on Khadidja right here, I just want to focus

14 on the process. The next step is this meeting with

15 you.

16 A. Repeat that for me.

17 Q. Sure. I want to understand. You're saying

18 that when a student has submitted all the correct

19 papers, no issue with that, that student is enrolled,

20 and the next step is placement, so that she can start

21 school, right?

22 A. Yes.

23 Q. Okay. And is Ms. Hilt correctly describing

24 what needs to happen for placement to occur, so that

25 the student can start school?

Page 27

1 A. Yes.

2 Q. Okay. And with regards to this whole e-mail

3 exchange, you never sent an e-mail to Ms. Hilt or

4 Balahl saying some of what Ms. Hilt is saying here is

5 incorrect in the following way, you didn't respond in

6 that way?

7 A. Like I said, I did not read the e-mail.

8 That was the mistake of the whole situation.

9 Q. And this was not just one e-mail, it was --

10 started out with an e-mail from Balahl, that's one,

11 right? That's one?

12 A. But that one didn't come to me, correct?

13 Q. Correct. Then Ms. Hilt says -- sends one to

14 you, so that's the first one you see, right? Is that

15 right, we'll count that one as one?

16 A. Okay.

17 Q. And then Balahl has a response, so that's a

18 second e-mail that you had received?

19 A. I was copied on it.

20 Q. Right. And then Mr. Hilt sends a reply to

21 Balahl, so that's three e-mails about a student's

22 enrollment that you didn't read when they were coming

23 across your computer?

24 A. That's correct.

25 Q. Okay.

Page 28

1 A. I didn't read them for detail. I -- yes.

2 Q. But in any event, what Ms. Hilt described in

3 terms of the next step, that was the district's policy

4 in terms of placing students so they could start

5 school.

6 A. No, I can't agree with that, because now

7 that I actually read the e-mail, it says a student is

8 not enrolled if she has provided reference to

9 enrollment, that's not policy at all.

10 Q. Okay. I understand you disagreed with that

11 part, so you're saying that is enrollment, but once

12 that's occurred, you are agreeing it was policy, that

13 the next step Ms. Hilt describes, that was policy for

14 the School District of Lancaster under your

15 administration of these placements?

16 A. I wouldn't necessarily call it policy. I

17 would probably say practice.

18 Q. Okay. That was the district's practice.

19 A. Yes.

20 Q. Still the district's practice?

21 A. I wouldn't say that. We're in the midst --

22 because of all this, reviewing all of our practices

23 concerning enrollment.

24 Q. Okay. But up until the time of the lawsuit,

25 this was your -- this was the district's practice?

Page 29

1 A. Okay. Yes.

2 Q. Okay. Thank you.

3 In the first e-mail by Balahl if you could

4 turn all the way to the last page, do you see that

5 Balahl refers to a different student, the name

6 referred to here he says Al Qasin, do you see that?

7 A. Yes.

8 Q. Okay. And you are familiar with a student

9 named Qasin Hassan, right?

10 A. Yes.

11 Q. And that was a student that you met with,

12 that you do remember meeting with in mid-December of

13 2015.

14 A. Yes.

15 Q. And you met at Reynold's, right?

16 A. Yes.

17 Q. His -- several members of his family were

18 there, right?

19 A. Correct.

20 Q. Ms. Hilt was there.

21 A. Yes.

22 Q. You remember that Megan Brown, a case worker

23 wasn't right there in the meeting that you had with

24 the family, but sort of came later and encountered you

25 outside where you had met.

Page 30

1 A. Correct.

2 Q. And you weren't sure one way or the other of

3 whether a case worker was in there with the family

4 during the meeting.

5 A. Correct.

6 Q. Okay. So that was December 10th, right,

7 does that sound right?

8 A. I don't remember the exact date.

9 Q. You talked before about student's enrolled

10 when their enrollment papers are in, and are you aware

11 that Qasin's case, that enrollment occurred on

12 November 2nd?

13 A. I don't know the exact date of his

14 enrollment, but I can say that enrollment dates might

15 be interpreted different, so to me, if you go to the

16 enrollment office, let's say September 1st, that

17 doesn't mean everything is complete on September 1st,

18 so there could be -- oftentimes people don't have

19 their immunizations or other paperwork, so there can

20 be a gap --

21 Q. Sure.

22 A. -- between the actual enrollment there.

23 Q. But you -- and because of that, you can't

24 have -- you can't be enrolled until, for example, you

25 have your immunizations in, right?

Page 31

1 A. Correct.

2 Q. All right. Could you turn to Exhibit 48?

3 A. Still in this binder?

4 Q. I believe it is in the second binder, in the

5 beginning of the second binder.

6 A. Where do you want me?

7 Q. So you recognize that this is a student file

8 for Qasin Hasan Hassan?

9 A. Okay.

10 Q. And if you could look at page 57.

11 A. Okay.

12 Q. And do you see that's a student enrollment

13 form.

14 A. Yes.

15 Q. And he has -- in the middle of the page,

16 next to where it says grade 9 entry date, there are

17 enrollment dates, district state US.

18 A. Yes.

19 Q. Okay. So he's enrolled by November 2nd,

20 right?

21 A. I wouldn't know that.

22 Q. Because you don't work with this form.

23 A. Correct.

24 Q. No reason to doubt he was enrolled in the

25 way you just described by that date?

Page 32

1 A. I could say safely that there was paperwork

2 completed on this date or started on this date, I

3 don't know --

4 Q. Okay.

5 A. -- the ramifications and what happened after

6 that.

7 Q. Assuming it was all completed --

8 A. I can't do that.

9 Q. Okay. He didn't have a meeting with you

10 until December 10th, right?

11 A. Yes.

12 Q. And he was not going to get to go to school

13 until he had that meeting with you and you did the

14 placement, right?

15 A. Yes.

16 Q. Does the district have any policies at the

17 time that Qasin was being enrolled, did the district

18 have any policy about how long a student had to wait

19 after his enrollment papers were complete before he or

20 she could have that meeting with you?

21 A. We try to do it within five days.

22 Q. Okay. So assuming these dates are correct,

23 and I know you're not going to vouch for that one way

24 or the other, this would be more like five weeks,

25 right?

Page 33

1 A. I'm not going to speak on that because I

2 don't know the circumstances.

3 Q. Okay. So --

4 A. There was Thanksgiving break in there, there

5 are parent/teacher conference breaks in there, that

6 happen late November, so I -- yes, is there a gap,

7 sure you can see the gap, but I'm not sure and this is

8 not a question because I don't know from the

9 enrollment office standpoint.

10 Q. And you're not suggesting that the fact that

11 students who are already enrolled in school get to

12 have parent/teacher conferences that that tolls the

13 time, suspends the time that the district has to get

14 the kids who are enrolling into school?

15 A. I mention the parent/teacher conferences

16 because there is no school for high school students on

17 those days. That's the only reason I mention that.

18 Q. Okay. And those would be at most a couple

19 of days during --

20 A. Yes.

21 Q. And Thanksgiving, the school district is

22 like every other one, four days, two school days?

23 A. Yeah, sometimes three, right.

24 Q. Okay. Now, at that December 10th meeting,

25 you didn't enroll Qasin, right?

Page 34

1 A. At that time we thought he was 19.
2 Q. But that wasn't really -- well, being 19
3 isn't a reason not to enroll a student, right, whose
4 family has enrolled him and submitted all the
5 paperwork.
6 A. It was 19 and he didn't partake in the
7 meeting.
8 Q. Okay. He didn't partake in the meeting.
9 That really was the main reason, wasn't it?
10 A. It was a combination because we couldn't
11 develop an academic graduation plan for him because he
12 wouldn't participate in the meeting.
13 Q. And you recognized that this young man was
14 not an English language speaker at all, right?
15 A. I would say yes, but he didn't try to
16 communicate so I don't know, but I would say yes.
17 Q. And you just decided he just wasn't
18 interested in school.
19 A. He did not participate in the meeting.
20 Q. And it wasn't mostly about his age, it was
21 more about his attitude and not engaging in the
22 process at the time, that's why you made that
23 decision, right?
24 A. We could not develop an academic plan for
25 him.

Page 35

1 Q. And so on that basis, you simply denied him
2 enrollment.
3 A. At that time, but a key factor was he didn't
4 participate so we couldn't have a discussion about the
5 plan.
6 Q. Did you have Ms. Hilt with you at these
7 meetings with the immigrant and refugee students,
8 right?
9 A. Yes.
10 Q. And that's -- as you've acknowledged, that's
11 because you don't have as much familiarity with this
12 population as she does, right?
13 A. Correct.
14 Q. And from working with her, have you learned
15 that some of these students have come from difficult
16 and traumatic circumstances?
17 A. Oh, I know that, yes.
18 Q. And -- right. It's probably just common
19 sense, right?
20 A. I'm a counselor by trade, sir.
21 Q. Good point. And that the failure to
22 communicate could be because of unfamiliarity with the
23 process or intimidation with the process or some other
24 cultural barrier, you understand that, right?
25 A. Yes.

Page 36

1 Q. And it's not like you talked with his family
2 for an hour and got to know them, this was a few
3 minute meeting, right?
4 A. It was about 15 I'd say.
5 Q. Okay. And the interactions with Qasin
6 weren't the whole interaction, right?
7 A. Correct.
8 Q. You had other siblings there who also had to
9 get placed.
10 A. Yes. I thought they were --
11 Q. His mother was clearly did want him to be in
12 school, right?
13 A. I can't judge that.
14 Q. Qasin did eventually get enrolled, right?
15 A. Yes.
16 Q. And that was only because his case workers
17 didn't give up on him, right?
18 A. I wouldn't go that far.
19 Q. They had to --
20 A. They advocated that his birthdate was
21 incorrect.
22 Q. And they advocated that he, in fact, wanted
23 to go to school and his mother wanted him to go to
24 school, right?
25 A. Yes.

Page 37

1 Q. They were not going to let the short
2 demonstration of difficult attitude be a barrier to
3 him going to school, right?
4 A. I don't know what a difficult attitude came
5 from, he just didn't partake in the meeting.
6 Q. All right. So going back to Khadidja, that
7 was another student that was raised to your attention
8 by the set of e-mails, or it was raised to Ms. Hilt's
9 attention and she copied you.
10 A. Raised to Ms. Hilt's attention, yes.
11 Q. And eventually you did get involved in the
12 situation.
13 A. I sent an e-mail that I shouldn't have sent,
14 yes.
15 Q. And we'll get to that. But -- and you also
16 had a meeting with some of the case workers from
17 Lutheran about Khadidja and that e-mail was one topic
18 of conversation.
19 A. I thought the topic of conversation was more
20 about the e-mail than Khadidja.
21 Q. Okay.
22 A. Because I don't remember meeting with
23 Khadidja.
24 Q. So in his e-mail, Balahl says that we
25 provided her -- we provide her, and I'm sorry, if you

Page 38

1 could go back to Exhibit 83, why don't you just take a
 2 minute and we'll wait a minute so you can get back
 3 there.
 4 Okay. So -- and I'm looking at the bottom
 5 of that first page and you can see there's an e-mail
 6 from Balahl that says, we provided her info and
 7 immunization record to the School District of
 8 Lancaster last November 16th. Do you see that? It's
 9 on the very first page. Do you see where I am?
 10 A. Page 1?
 11 Q. Yeah, it's the front page and it's got a
 12 label ISSA44 at the bottom?
 13 A. Yeah, let me find it.
 14 Q. Okay. All right. Balahl is telling you and
 15 Ms. Hilt, we submitted everything on November 16th, do
 16 you see that?
 17 A. She told Ms. Hilt.
 18 Q. And copy to you.
 19 A. Yes.
 20 Q. And --
 21 A. I didn't read the e-mail.
 22 Q. You have no reason to doubt that that's
 23 accurate, right?
 24 A. I'm not going to sit here and call anyone a
 25 liar, I don't --

Page 39

1 Q. Okay. Did you at any time, and I mean
 2 including after this lawsuit was filed and after your
 3 deposition was taken, go back and read Khadidja's
 4 student records to see if he was -- had this at the
 5 right time?
 6 A. No.
 7 Q. Now, this e-mail is being sent more than two
 8 months after the date Balahl has represented that the
 9 papers are in, right?
 10 A. It looks like, yes, I can see that.
 11 Q. And you said you have no recollection of
 12 having met with her.
 13 A. No.
 14 Q. That's a problem, right, if that's true?
 15 A. Yes.
 16 Q. That would be a second case just among the
 17 plaintiffs in this litigation where the enrollment
 18 date in their records is weeks or even months before
 19 meeting with you, in this case, not meeting with you
 20 at all.
 21 A. Yes, that's a problem. We have some things
 22 to correct.
 23 Q. And I mean, it's not just like a technical
 24 problem, right, like this is a student's education
 25 which is being delayed at this point two months.

Page 40

1 A. I can't say that it's been delayed, I don't
 2 know the circumstances of the delay.
 3 Q. And you didn't investigate to see what
 4 happened here.
 5 A. Right.
 6 Q. Okay. And even perhaps more so than Qasin,
 7 she would never have gotten into school if her case
 8 workers didn't advocate for her and bring these --
 9 this issue to the attention of Ms. Hilt?
 10 A. I can't say that.
 11 Q. Could you turn to Exhibit 16 and sorry, just
 12 before that, Balahl's understanding in this e-mail as
 13 expressed in this e-mail is that Khadidja's been
 14 denied enrollment, right?
 15 A. Yeah, I guess so, yes.
 16 Q. Okay. Could you turn to -- that you've said
 17 no to her.
 18 A. I did not say no to her.
 19 Q. Okay. But that's his understanding.
 20 A. I can't speak for his understanding.
 21 Q. Fair enough. Could you turn to Exhibit 16
 22 which is in the day 1 binder?
 23 A. You said 16?
 24 Q. That's right. This is the e-mail that you
 25 sent that you've been eager to talk about, right?

Page 41

1 A. Yes, sir.
 2 Q. Okay. And in response to Balahl's e-mails
 3 where he's saying that his client is not being
 4 enrolled, you sent an e-mail, I appreciate -- well, I
 5 should confirm for the record, you didn't mean to send
 6 this e-mail to Balahl.
 7 A. That is correct.
 8 Q. And what you say in that e-mail is, this guy
 9 is nuts, makes me say no in all caps all the time, and
 10 then it says, decisions are made on a case-by-case
 11 basis, that's what was said in the e-mail to Balahl,
 12 right?
 13 A. That's what I inadvertently wrote, but it
 14 was not involving this situation. It was involving a
 15 situation with Ms. Hilt, if you want me to tell you,
 16 I'll tell you.
 17 Q. I think that's necessary, this is a question
 18 I asked you at your deposition.
 19 A. So I am an unofficial mentor to Ms. Hilt, we
 20 have a very unique relationship. She was asking me
 21 some advice about her supervisor, and he was -- so
 22 after a series of what should I would say here's my
 23 advice, and then I would give my advice, she wouldn't
 24 accept it and work on it, wouldn't get back, and when
 25 she sent the e-mail, I thought it was about the other

Page 42

1 situation, and I just typed in blind rage because I
 2 was angry at her about not accepting my advice about
 3 how to deal with her supervisor. And I didn't want to
 4 put that in there, but this was a mistake on my part,
 5 I owned it, I apologized, but there is no -- this was
 6 no evil plot to keep people out of school or any of
 7 that sort of thing. I'm a taxpayer in Lancaster, I
 8 believe in Lancaster, I made a mistake.
 9 Q. And so just so I understand, this e-mail
 10 you're upset at -- was directed at Ms. Hilt?
 11 A. Correct.
 12 Q. Nevertheless, you had to confront this e-
 13 mail with the person who it was sent to or at least
 14 his supervisors, right?
 15 A. Yes.
 16 Q. And am I correct in understanding that the
 17 meeting that took -- that you -- in which you
 18 eventually discussed this e-mail with Lutheran Refugee
 19 Services, that didn't -- Balahl was not there?
 20 A. I don't remember.
 21 Q. Okay.
 22 A. I don't think so, but I don't know.
 23 Q. But there were definitely people there from
 24 Lutheran.
 25 A. Yes.

Page 43

1 Q. And Ms. Hilt was there.
 2 A. Yes.
 3 Q. And Dr. Abram was there.
 4 A. Yes.
 5 Q. And this e-mail was discussed.
 6 A. Yes.
 7 Q. And had you brought the e-mail to the
 8 attention of Dr. Abram before you had to discuss it at
 9 that meeting?
 10 A. I don't remember.
 11 Q. Was the e-mail there available for everybody
 12 who was participating in that meeting, had anybody
 13 brought it with them?
 14 A. I don't remember.
 15 Q. You apologized for sending it, right?
 16 A. Yes.
 17 Q. And after this meeting Khadidja did start at
 18 Phoenix, right?
 19 A. Don't know the timing of her start in
 20 relation to the meeting. I don't remember the date of
 21 the meeting.
 22 Q. What changes did the School District of
 23 Lancaster did it make to its enrollment and placement
 24 process after that meeting?
 25 A. One thing we worked on with the enrollment

Page 44

1 office was to come up with a form where I could just
 2 check credits, the number of credits a student would
 3 make without necessarily having to have the face-to-
 4 face meeting.
 5 I think what in conversations with Ms.
 6 Riddick, I think there were times when they would get
 7 swamped with refugee students at one time. They may
 8 get four or five families within a week, and then they
 9 start to play catch-up trying to stay ahead of things,
 10 and then -- so we were trying to devise a way to speed
 11 up the process.
 12 Q. When did that -- and is that approach now
 13 fully in place in the school district?
 14 A. I wouldn't say fully in place because we're
 15 -- we've been in summer.
 16 Q. Okay. But this meeting that followed on the
 17 heels of the efforts to enroll Khadidja, that happened
 18 in February, right, that we were just talking about?
 19 A. The meeting happened in February?
 20 Q. Yes.
 21 A. I don't remember exactly when it was, that
 22 could be right.
 23 Q. Okay. And are you saying that no changes to
 24 the enrollment and placement process for immigrants
 25 and refugees occurred before the end of the school

Page 45

1 year?
 2 A. We tried to be more conscious of getting
 3 students through faster, for all students, not just
 4 refugee students.
 5 Q. And being conscious of that, were you
 6 conscious that there's actually a five day requirement
 7 that you have to adhere to so the students --
 8 A. I would say more conscious of communicating
 9 between all the parties involved to make --
 10 Q. Who are the parties?
 11 A. That would be Ms. Riddick and her staff and
 12 myself.
 13 Q. Okay. So better communications within the
 14 school district, but you can't vouch for that -- those
 15 better communications resulting in the students
 16 actually getting into school within five days of
 17 completing their enrollment papers?
 18 A. I can't speak to that because that would
 19 vary based on whatever the enrollment said everything
 20 was complete.
 21 Q. Okay.
 22 A. And I think one of the things moving forward
 23 might be differentiating the dates of the first time
 24 you go to the enrollment office, and then maybe having
 25 another date saying everything is completed date would

Page 46

1 you give a better time frame whether it was in five
2 days or not.
3 Q. Sure. And I'm really talking about once
4 everything is complete. I take it from your answer
5 that while you're trying to improve communications,
6 you haven't developed a policy that ensures each --
7 that students all get into -- that students all get
8 into -- start school within five days of completing
9 their enrollment process, really completing it.
10 A. One, I don't implement policy, and two,
11 that's probably a better question for someone else
12 other than me, because I don't get to supervise Ms.
13 Riddick, so I can't speak to that.
14 Q. Who is that a better question for?
15 A. That might be a question for Dr. Abram.
16 Q. And after this meeting -- and this meeting
17 in February wasn't simply --
18 A. Which meeting?
19 Q. I'm sorry, the meeting in which the e-mail
20 was discussed.
21 A. Okay.
22 Q. That's not the only thing that was
23 discussed, right?
24 A. There was some conversations about
25 graduation versus language acquisition I guess would

Page 47

1 be the --
2 Q. Okay. Did Dr. Abram ask you any questions
3 about the placement process after that meeting was
4 over?
5 A. I don't think so, but I don't remember. I
6 mean, we talk all the times about improving
7 everything.
8 Q. And did he ask you to investigate anything
9 about the process of enrolling immigrant and refugee
10 students?
11 A. No.
12 Q. Did he ask you to do anything different than
13 you had been doing up to that point?
14 A. No.
15 Q. Did he ask you any questions about Khadidja
16 Issa?
17 A. No.
18 Q. Or Qasin Hassan?
19 A. No, not individually, no.
20 Q. Did you understand Dr. Abram to be familiar
21 with how you did your job in terms of getting
22 immigrant and refugee students placed and started in
23 school?
24 A. Repeat that for me.
25 Q. Yeah. Did you understand Dr. Abram to be

Page 48

1 familiar with how you did your job of placing students
2 at -- in school so they could start?
3 A. That's a question for him.
4 Q. Okay. And the improving communications
5 between yourself and Ms. Riddick, who's responsible
6 for enrollment, right?
7 A. Yes, she is.
8 Q. That improvement you described, did anybody
9 direct you to do that?
10 A. I wouldn't say anyone directed us, we --
11 Q. Okay. So that was at your initiative and
12 Ms. Riddick's initiative?
13 A. Yes.
14 Q. Has anybody, Dr. Abram or Dr. Rau, has
15 anybody directed you to do anything different in terms
16 of getting students started in school, other than what
17 you've described as your own initiative?
18 A. No. We haven't -- no.
19 Q. Okay.
20 MR. ROTHSCHILD: Can I have one moment,
21 Your Honor?
22 THE COURT: Certainly, Counselor.
23 (Pause)
24 MR. ROTHSCHILD: No further questions,
25 thank you.

Page 49

1 THE COURT: Do you have a question for
2 your co-counsel?
3 UNIDENTIFIED: I did.
4 THE COURT: Certainly, sir.
5 (Pause)
6 MR. ROTHSCHILD: That's all, Your
7 Honor.
8 THE COURT: Thank you, Mr. Rothschild.
9 Attorney O'Donnell, do you have any redirect?
10 MS. O'DONNELL: Just a few.
11 THE COURT: Certainly, you may proceed.
12 REDIRECT EXAMINATION
13 BY MS. O'DONNELL:
14 Q. Mr. Blackman, I'd like to take you a little
15 bit to that meeting with Qasin Hassan and his family.
16 A. Okay.
17 Q. Did you receive any information about
18 Qasin's preferences or goals moving forward?
19 A. I was told by Ms. Hilt that he wanted to
20 work.
21 Q. Okay. And was that information that was
22 communicated to her at the time of that meeting?
23 A. I believe so.
24 Q. Okay. But no one indicated to you directly,
25 to you directly whether or not Qasin had a goal and

Page 50

1 what that was?
 2 A. Correct.
 3 Q. You were left essentially to make the
 4 observation that Qasin just wasn't interested in
 5 having a conversation with you?
 6 A. Correct.
 7 Q. And in terms of the delay in Khadidja's
 8 meeting with you, do you know whether or not she had
 9 issues with getting herself immunized properly and on
 10 time?
 11 A. I would assume that would be the issue, but
 12 I don't recall that specifically, but I think so, that
 13 was the issue.
 14 Q. And other than Qasin Hassan, did any of the
 15 plaintiffs in this lawsuit ever come to meet with you
 16 about transferring to McCaskey?
 17 A. No.
 18 Q. Okay. As far as Alembe Dunia's enrollment,
 19 do you know whether or not he was provisionally
 20 enrolled until having a conversation with you?
 21 A. Alembe was the older one, correct?
 22 Q. Correct.
 23 A. No, he failed to attend a meeting to meet
 24 with me to discuss a plan.
 25 Q. So then was enrollment complete or not

Page 51

1 complete?
 2 A. I believe the enrollment was complete and he
 3 failed to show for the meeting.
 4 Q. Okay. So then the answer was wrong, when I
 5 admitted that he was -- refused enrollment, he was not
 6 refused enrollment.
 7 A. He was not refused enrollment.
 8 Q. Didn't show up for his meeting.
 9 A. Yes.
 10 Q. And therefore was not placed --
 11 A. Correct.
 12 Q. -- in school.
 13 A. Yes.
 14 Q. Thank you. And lastly, were you here for
 15 Dr. Rau's testimony on Friday?
 16 A. Yes, ma'am.
 17 Q. Okay. And did you hear her say that there
 18 was a policy with respect to placement of students at
 19 either McCaskey or Phoenix?
 20 A. I did hear her say that.
 21 Q. And do you --
 22 A. I --
 23 Q. How do you read that?
 24 A. I would have to respectfully disagree with
 25 my boss, Dr. Rau.

Page 52

1 Q. Why?
 2 A. It's not a policy, it's been a practice that
 3 was established when Dr. Bishop was here to review
 4 students 17 and over to try to get a good graduation
 5 plan for them so they wouldn't flounder in school
 6 without any purpose, so we could help guide them and
 7 get them to graduation.
 8 Q. And to that end, is it important to you and
 9 is it important to the district that I should be
 10 asking whether or not these children leaving the
 11 School District of Lancaster at graduation are self-
 12 motivated adults?
 13 A. I think as a taxpayer in the community, as
 14 an educator in general we want lifelong learners, we
 15 want productive citizens, and we want people to be
 16 able to support and sustain their families as they
 17 grow through young adulthood into full adulthood and
 18 without a high school diploma you can't open doors, so
 19 you can't go to the military because they want people
 20 with diplomas. You can't go to community college
 21 because they want people with diplomas. And post-
 22 secondary education everyone wants you to have a
 23 diploma.
 24 So for people to be in school and leave
 25 without a diploma, it's a failure for us as a system,

Page 53

1 it's a failure for the district, it's a failure for
 2 the school, and I feel a failure since a failure when
 3 kids walk away without that, and I feel a sense of
 4 great pride when on Saturday morning as I was walking
 5 a former mother of one of my students gave me an
 6 update on how well her son's doing after he went
 7 through difficulties, getting suspended, getting in
 8 trouble, but he was able to go to Phoenix, get a
 9 diploma, and now he's in community college and doing
 10 well. She's very proud of him, so it's what we try to
 11 do for all students.
 12 Q. Success is -- well, let's put it this way,
 13 is failure an option for you?
 14 A. Failure is not an option.
 15 MS. O'DONNELL: Thank you.
 16 THE COURT: Thank you, Counselor. Mr.
 17 Rothschild, any recross?
 18 MR. ROTHSCHILD: Just one question,
 19 Your Honor.
 20 THE COURT: Certainly, sir.
 21 RE-CROSS-EXAMINATION
 22 BY MR. ROTHSCHILD:
 23 Q. Mr. Blackman, when you say you assumed that
 24 Khadidja's delay was the result of an immunization
 25 issue, you didn't actually do anything to investigate

Page 54

1 that, did you?
 2 A. No.
 3 MR. ROTHSCHILD: Okay. That's all,
 4 Your Honor.
 5 THE COURT: Thank you, sir. Anything
 6 further?
 7 MS. O'DONNELL: Nothing further, Your
 8 Honor.
 9 THE COURT: And, sir, I just have a few
 10 questions. I want to focus on these 17 to 21-year
 11 olds. First of all, they're entitled to a free public
 12 education during that age, but it's not compulsory,
 13 correct?
 14 THE WITNESS: Correct.
 15 THE COURT: So any one of them, if they
 16 don't want to be in school, they don't have to be in
 17 school.
 18 THE WITNESS: Right, they can walk out
 19 the door and there's not any input -- we try to give
 20 input, we try to get them to re-evaluate their
 21 decisions, but because they're that age, life happens
 22 to them. Sometimes they have to go to work to support
 23 their families because often, I believe it's 90 days
 24 some of the support from some of the agency leaves, so
 25 now they're forced with how do we keep our housing,

Page 55

1 how do we feed other siblings, and they often are the
 2 young bodied able people to be able to go out and find
 3 jobs to support their families.
 4 And that's a temporary resolution, but
 5 for their futures at some point they're going to need
 6 some sort of credential to say that they're worthy to
 7 get hired or to move on to something else.
 8 So we feel real strongly that it has to
 9 be a real comprehensive plan to get them to a diploma,
 10 so that they can be more successful in our community.
 11 THE COURT: And the refugees that we're
 12 speaking of, again we're only talking about 17 to 21,
 13 it's their arriving at your school in that age range,
 14 correct?
 15 THE WITNESS: Yes, sir.
 16 THE COURT: And they're arriving at
 17 your school with limited or no English capabilities at
 18 all.
 19 THE WITNESS: Correct.
 20 THE COURT: So you will uniformly
 21 assign them to the Phoenix School if they want to take
 22 advantage of their public education.
 23 THE WITNESS: Yes, because of the
 24 Pennsylvania Information Management System, or PIMS as
 25 we call it, we can't place a student who has zero

Page 56

1 credits in an upper grade. So if a student, let's say
 2 he comes from Brooklyn, New York with zero credits and
 3 is 17 years old, we would assign them also to Phoenix
 4 for credit recovery because we're trying to get them
 5 to graduation because as their peer group, and a lot
 6 of times don't want to be in classes with students who
 7 are their younger siblings in ninth grade.
 8 So I'm 17 with no credits, and my
 9 cousin who is 13, just got promoted from eighth to
 10 ninth grade, they could end up in the same math class
 11 because they both have no credits. Then that older
 12 student gets discouraged, doesn't want to be there,
 13 and leave school because he's embarrassed to be in the
 14 grade.
 15 So by using Phoenix as our credit
 16 recovery program, it's a way for them to continue to
 17 get their education in an environment with similar
 18 peers so they can be successful and get to graduation.
 19 THE COURT: Now, is it an educational
 20 theory to try to keep them with their peers, and let
 21 me explain why I ask that question. They're entitled
 22 to a free public education till they reach 21.
 23 THE WITNESS: Correct.
 24 THE COURT: We all know that most high
 25 school -- well, you know better than I do, but most

Page 57

1 high schoolers graduated either 17 or 18.
 2 THE WITNESS: Correct.
 3 THE COURT: So they're still 19, 20,
 4 and 21, that's three extra years of considering normal
 5 high school is only four years long anyway, when
 6 somebody's 17 years old, they actually have five years
 7 they could have free public education.
 8 So if they didn't need to be with their
 9 actual age peers, but rather be more with their
 10 similarly educational peers, in other words, people
 11 that don't know how to speak English, et cetera, if
 12 they were to start at the age of 17 in a regular
 13 school at ninth grade, and you're suggesting we can't
 14 do this, I'm going to have you explain it to me again,
 15 they can even repeat ninth grade, they could really
 16 focus a lot on education, learning their capabilities
 17 with respect to education in that first year of ninth
 18 grade. They could spend another year in ninth grade
 19 and still be able to do tenth, eleventh and twelfth
 20 grade before they age out. But that's not even being
 21 considered, correct?
 22 THE WITNESS: Right. Because that is
 23 not in line with the PDE standards for getting all
 24 students to graduate within the four year cohort.
 25 Because now with the implementation of no child left

Page 58

1 behind and the other national laws, all of the
 2 national research says for schools to improve their
 3 graduation rates, you have to find alternative
 4 pathways for students to recover credits more quickly
 5 because they lose interest or life happens to them.
 6 Where some of the young men get young
 7 ladies pregnant, they have to leave to support their
 8 family, all sorts of those circumstances. And that's
 9 the reason we put them in a situation where they can
 10 get a good quality education started in ninth grade.
 11 And if they happen to do a good job and
 12 earn credits at Phoenix, they can come back to
 13 McCaskey and get on track that way also.
 14 THE COURT: Okay. Because my concern
 15 here is this idea of educational theory. Your job
 16 right now is more about counseling, placement and
 17 preventing dropouts.
 18 THE WITNESS: Correct.
 19 THE COURT: And that has to somehow
 20 interplay with educational theory. But if I've got
 21 this unique subset of students, and it's a very small
 22 subset in your school, correct?
 23 THE WITNESS: Correct, yes.
 24 THE COURT: The refugees aged 17 to 21
 25 who basically do not speak English. And the question

Page 59

1 becomes, as I look at the law, what is the educational
 2 theory being employed by the school district and does
 3 that educational theory, is it recognized sound by
 4 experts, is it reasonably calculated to implement the
 5 -- are your programs and practices actually used
 6 reasonably calculated to implement effectively the
 7 educational theory, and very importantly over time,
 8 has it demonstrated that you are able to produce
 9 results indicating that language barriers confronting
 10 the students are actually being overcome.
 11 Because as you know, learning English
 12 as someone who wants to be productive in this
 13 community is a critical, critical tool to have.
 14 THE WITNESS: Right.
 15 THE COURT: So here, I guess whether
 16 this is an educational -- I know it's a long talk very
 17 little questioning --
 18 THE WITNESS: No, I follow you.
 19 THE COURT: What do you think?
 20 THE WITNESS: Well, the research I did
 21 on my doctoral preparation with Robert Balfant (ph),
 22 (indiscernible) University at Penn on dropout
 23 prevention and all the effective strategies coming out
 24 of the National Dropout Center out of Clinton
 25 University says that you get alternative pathways for

Page 60

1 all students to be successful, so they can get the
 2 skills that they need to move and be productive as a
 3 gateway to employment, military, post-secondary
 4 education.
 5 It is my understanding that the
 6 education that they can get at Phoenix, especially
 7 around the ELL subject is good and they can start to
 8 do that. I guess the question becomes we're really
 9 trying to get kids to graduate so they can be
 10 productive.
 11 And I heard people here on Friday talk
 12 about ten years to acquire language acquisition and so
 13 even if they were there for the additional four years,
 14 would they stay because high schools aren't really
 15 designed for older students.
 16 So on Wednesday night at McCaskey,
 17 there's going to be a freshman orientation night. And
 18 in that auditorium will be anxious parents with their
 19 13 and 14-year old students because that's who's in
 20 ninth grade.
 21 THE COURT: Okay. All right. Thank
 22 you very much, sir. Attorney O'Donnell, do you have
 23 any questions in light of the Court's questions?
 24 MS. O'DONNELL: I do have because
 25 that's --

Page 61

1 THE COURT: You may proceed.
 2 MS. O'DONNELL: -- an important
 3 subject.
 4 FURTHER REDIRECT EXAMINATION
 5 BY MS. O'DONNELL:
 6 Q. So along that line, when you have children
 7 of the age, ages of 13 and 14 who are just starting
 8 their high school careers and these students or
 9 proposed students who are between the ages of 17 and
 10 21, are there -- there's a -- would you agree, that
 11 there's a maturity disparity between the 17 to 21 year
 12 olds and the 13 and 14-year olds who are going to be
 13 sharing the same classroom?
 14 A. Absolutely.
 15 Q. What does research say about that?
 16 A. So research says that neither side is
 17 successful. So if you put students in a math class
 18 who are in Algebra I for the first time, the younger
 19 students don't normally respond enthusiastically to
 20 ask questions and show what they know to the teachers,
 21 and the older students shy away because they're
 22 embarrassed because they've had it before and haven't
 23 mastered it, and they're often really embarrassed to
 24 be there.
 25 And so the maturity levels of students, you

Page 62

1 know you have 18-year olds who are thinking about
 2 other things than someone who's 13.
 3 Q. Like their children?
 4 A. Yes. And the impulsiveness of younger
 5 students where they're just doing things, having fun.
 6 So when you're 13 and 14 and you like a girl, you kind
 7 of push her in the back, play with her hair, that's
 8 how -- they're afraid to say I like you, where an 18-
 9 year old, they know what to say.
 10 Q. Got you.
 11 A. And so I -- we really try hard to make good
 12 decisions for each student, so they can be successful.
 13 MS. O'DONNELL: Thank you.
 14 THE COURT: Thank you very much,
 15 Counselor. Mr. Rothschild, do you have any recross?
 16 FURTHER RECROSS-EXAMINATION
 17 BY MR. ROTHSCHILD:
 18 Q. You said that students who'd caught up in
 19 credits at Phoenix could possibly transfer back to
 20 McCaskey.
 21 A. Yes.
 22 Q. How do they know?
 23 A. They talk with their counselor at Phoenix.
 24 Q. Okay. So that's not something you're
 25 involved with?

Page 63

1 A. I'm involved in making sure if they come
 2 back, they get to McCaskey, get to their counselor. I
 3 need to know about it to really review it, to make
 4 sure that it's still a good graduation plan for them
 5 to come back.
 6 Q. Did you have any interaction regarding
 7 Anyemu Dunia about whether that was a path that he
 8 could take? Anyemu Dunia?
 9 A. That's the younger one, correct?
 10 Q. That's correct.
 11 A. That's the one that recently graduated.
 12 Q. Correct.
 13 A. No, I was never asked to do that because my
 14 understanding he wanted to graduate.
 15 Q. Your understanding from talking to him?
 16 A. No, talking to Ms. Falcone and Ms. Heisey.
 17 Q. The maturity disparity that you're talking
 18 about between high school freshman and say 18-year
 19 olds who currently are being placed in Phoenix, that's
 20 not the basis for your placing those older students at
 21 Phoenix, is there?
 22 A. It's part of it.
 23 Q. And so that's part of the -- and is that
 24 part of any policy, that this is the reason we would
 25 send students to Phoenix?

Page 64

1 A. It's not a policy, it's a practice.
 2 Q. Okay. And so it's your practice --
 3 A. It's a practice based on research, sound
 4 graduation strategies and techniques.
 5 Q. Okay. Is that part of the Phoenix contract
 6 that one of the things that they are providing for the
 7 School District of Lancaster is to keep students at
 8 different maturity apart?
 9 A. No, I don't think so. I haven't looked at
 10 that contract in probably six years.
 11 MR. ROTHSCHILD: Okay. Thank you, no
 12 further questions.
 13 THE COURT: Thank you, Counselor. And
 14 one more question I have, sir.
 15 I understand there is no magic wand
 16 here. You're being confronted with a very serious
 17 challenge when you are presented with these refugee
 18 children who are older, even when they're younger, but
 19 they have no English, their cultural histories are
 20 different, they're -- what they've been through has
 21 been oftentimes very traumatic, and they find
 22 themselves now in America.
 23 So recognizing the challenges that you
 24 have, if you were to believe the testimony of the
 25 plaintiff's expert that McCaskey international's

Page 65

1 program is a far better way to start them off a year
 2 in that international program to gain the basic
 3 fundamentals of English and understanding the language
 4 and the ability to then move on to learn more things
 5 in English, if you were to believe that expert and
 6 that the Phoenix school and its effort to teach
 7 English in that 80-minute block, accelerated pace,
 8 which actually ends up giving them less English as a
 9 second language instruction, less instruction in the
 10 basics of English, would it make sense to you for a
 11 17, 18, 19-year old refugee with no English background
 12 to start on what the expert referred to as the runway,
 13 that year in the international school at McCaskey?
 14 THE WITNESS: I think -- I didn't hear
 15 the testimony, but I would have to disagree with that
 16 premise, Your Honor, from the standpoint of they are
 17 looking for the international school of 2001 and 2002
 18 that was a huge warm fuzzy where they did lots and
 19 lots of cultural activities, but it wasn't all based
 20 in academics and success.
 21 They had teachers and teacher's aides
 22 who were good people, loved kids, loved working with
 23 kids, but they weren't highly qualified teachers to
 24 really teach them instruction. And so when some of
 25 the early data came out because we were under the

Page 66

1 review because of the Gates Foundation money, they
 2 were not performing academically well.
 3 And so it's this nostalgic image of
 4 that real community that was really welcoming and
 5 supportive in social ways but not in academic ways.
 6 And so we, the district, at that point was under the
 7 gun to correct that to make it more rigorous and have
 8 the same rigor that we have at Phoenix with our credit
 9 recovery program there.
 10 So they were designed to mirror each
 11 other. And I believe that was the inception of the
 12 position that Ms. Hilt had, her two predecessors. I
 13 think that ELL coordination piece came out as a result
 14 of that early data from back in 2003, 2004.
 15 THE COURT: And if the plaintiffs were
 16 successful in their lawsuit and these six refugee
 17 children or other similarly situated refugee children,
 18 excuse me, which I recognize are relatively a small
 19 number of children and some adults once they reach 18,
 20 if they were successful, and you are now in a position
 21 where you had to place them at McCaskey, if they
 22 wanted to go to McCaskey, could you do it?
 23 THE WITNESS: Yes, but they wouldn't be
 24 in the international school probably. I don't know
 25 that for sure, depending on when they started. But

Page 67

1 some of them would probably be out in the other
 2 smaller communities.
 3 THE COURT: And you've already kind of
 4 set forth some of the consequences of that, such as
 5 the maturity mixing younger children with older. Are
 6 there any other consequences that you can think of if
 7 these children went to McCaskey?
 8 THE WITNESS: I'm wondering and it's
 9 hard to predict, I wonder how they would do in a
 10 larger environment. McCaskey has 28, 2,900 students
 11 as opposed to 350 at Phoenix, so is the smaller
 12 setting better for them, coming out of some other
 13 trauma that they've come from. Or is it better to be
 14 in two buildings with almost 3,000 students.
 15 THE COURT: Okay. Thank you very much,
 16 sir. I'm sorry, Attorney O'Donnell, do you have any
 17 questions in light of my questions?
 18 MS. O'DONNELL: I do not.
 19 THE COURT: Attorney Rothschild?
 20 MR. ROTHSCHILD: No, Your Honor.
 21 THE COURT: Sir, thank you very much,
 22 you may step down.
 23 Mr. Rothschild, would you like a ten
 24 minute recess before we call the next witness?
 25 MR. ROTHSCHILD: I won't be examining

Page 68

1 the next witness, so I'm going to refer to others.
 2 MS. O'DONNELL: Sure, ten minutes would
 3 be great.
 4 THE COURT: Very well. We'll stand in
 5 recess for ten minutes.
 6 THE CLERK: All rise.
 7 (Recessed at 10:45 a.m.; reconvened at 10:57
 8 a.m.)
 9 THE CLERK: All rise.
 10 (Call to Court)
 11 THE COURT: You may be seated, thank
 12 you.
 13 The Court is called to order. All
 14 parties previously present are once again present.
 15 Attorney O'Donnell, you may call your next witness.
 16 MS. O'DONNELL: Thank you. Your Honor,
 17 we'd like to call Ms. Aura Heisey.
 18 THE COURT: Okay. Good morning, ma'am.
 19 MS. HEISEY: Good morning.
 20 THE CLERK: Please raise your right
 21 hand.
 22 AURA HEISEY, WITNESS, SWORN
 23 THE COURT: Thank you very much.
 24 Ma'am, you may be seated. And, ma'am, would you
 25 please state your full name, spelling your last name

Page 69

1 for the record.
 2 THE WITNESS: Sure, Aura Heisey, H-e-i-
 3 s-e-y.
 4 THE COURT: Thank you very much.
 5 Counselor, you may proceed.
 6 MS. O'DONNELL: Thank you.
 7 DIRECT EXAMINATION
 8 BY MS. O'DONNELL:
 9 Q. Ms. Heisey, good morning.
 10 A. Good morning.
 11 Q. Would you give us a brief description of
 12 your educational background?
 13 A. Sure. So I have a bachelor's of fine arts
 14 from the Pennsylvania State University. I also have a
 15 bachelor's of science in art education from that same
 16 university and a minor in international arts. And
 17 then I have my Masters of education and administrative
 18 leadership from Cabrini University.
 19 Q. Okay. Where are you currently employed?
 20 A. I'm currently employed with the School
 21 District of Lancaster. I'm an assistant principal at
 22 McCaskey High School.
 23 Q. Okay. And prior to this position, what
 24 position did you hold, if any?
 25 A. I was the principal at Phoenix Academy,

Page 70

1 which is also with the School District of Lancaster.
 2 Q. Okay. What do you envision the differences
 3 in those positions to be?
 4 A. Well, the big one is I'm going to be going
 5 from 350 students to having 2,800 students. But in my
 6 role as principal at Phoenix, I was the academic lead
 7 right underneath the executive director, and
 8 transitioning to McCaskey campus, I'm going to be one
 9 of six to eight assistant principals that are under a
 10 lead principal. So I'll be in a similar supportive
 11 role, but many of my academic duties will be split
 12 amongst a team of people.
 13 Q. As the academic lead at Phoenix Academy,
 14 what were your duties and responsibilities?
 15 A. So the way that role works within the
 16 Camelot model is that I was the instructional leader.
 17 So I was in charge of anything essentially relating to
 18 teaching and learning and my ability. So teacher
 19 observations, both formal and informal, testing and
 20 that could be state testing, that could also be
 21 progress monitoring and then also making sure the
 22 curriculum that is the same as the school district is
 23 being implemented with our teachers, and that they're
 24 submitting lesson plans weekly.
 25 Q. Okay. We heard some names during the course

Page 71

1 of this litigation. Were you a supervisor over Jandy
 2 Rivera?
 3 A. I was but only for the last six months that
 4 she was at Phoenix. So I became acting principal in -
 5 - it would've been fall of 2012, and she left I
 6 believe in January of 2013. So it was during that, I
 7 guess fall semester.
 8 Q. Okay. And in terms of what you expect, what
 9 are the expectations of the teachers of the students
 10 under your supervision?
 11 A. So teachers they make weekly lesson plans,
 12 the night before the first week of school, and in
 13 those lesson plans, accommodations are provided for
 14 in-class activity that's happening that week in their
 15 room. And plans are submitted for the entire week,
 16 aligned to the standards and then the core curriculum
 17 provided by the school district.
 18 So teachers are to make sure that they're
 19 following the curriculum pacing guides and providing
 20 those accommodations that are necessary in order to
 21 cover that material that needs to be in that amount of
 22 time.
 23 Q. And what do the lesson plans reflect in
 24 terms of accommodations, what does that mean?
 25 A. So accommodations are provided. We say that

Page 72

1 many times accommodations are good for all students,
 2 so you might be providing an accommodation of, for
 3 example, using a visual or a video in your classroom
 4 that could be geared towards an ELL learner or even a
 5 special education student who might, you know, work
 6 better from seeing something visually.
 7 However, all students are going to benefit
 8 from having that as an extension with the material.
 9 So accommodations we say, you know, are good for all,
 10 but obviously are required for different types of
 11 learners.
 12 Q. And what is the expectation in terms of the
 13 instructional methods?
 14 A. So the instructional methods and
 15 instructional strategies that are used at Phoenix
 16 Academy are the jobs for the future instructional
 17 strategies and that's across the board with Camelot
 18 schools.
 19 And those are again just good teaching
 20 practices that are good for all students. However,
 21 they're specifically targeted to make sure that
 22 students are college and career ready.
 23 So there are six of those strategies and
 24 many of those things align themselves to students who
 25 have different learning needs, writing to learn is one

Page 73

1 of them, scaffolding, collaborative group work,
 2 questioning, classroom talk and then literacy groups.
 3 So all those strategies are things that many
 4 times teachers are doing right out of college. It
 5 just means we don't call it that name, so it's a good
 6 framework to make sure that we're servicing all
 7 students in our program.
 8 Q. And in terms of the curriculum -- you
 9 mentioned that you're using the same curriculum as
 10 McCaskey; is that accurate?
 11 A. Yes.
 12 Q. And what parts of the curriculum are used at
 13 Phoenix?
 14 A. For all students?
 15 Q. Yes.
 16 A. So we use the same textbooks and all of
 17 those materials, we call them consumable and non-
 18 consumable materials. So even if it's a workbook that
 19 comes with our reading intervention, for example, read
 20 180, all of those materials are provided to us every
 21 year from the school district.
 22 Even the same sets of novels that are used
 23 in communication arts classes, there's specific
 24 different novels for each grade 9 through 12, all of
 25 that is provided to us the same as it would be at

Page 74

1 McCaskey.

2 In addition to the curriculum pacing guides

3 and all of the professional development researches,

4 which are on our on-line drive, on all of our

5 computers, so all of that is consistent.

6 Q. What is a curriculum pacing guide?

7 A. A curriculum pacing guide is designed with

8 the coordinators, and then lead teachers of the

9 departments. And what it is, it's an outline or a

10 road map for your school year, that's aligned with the

11 common core standards.

12 It's viewed as a road map, so obviously

13 administrators and other coordinators as they're going

14 in to observe, understand that sometimes teachers need

15 to make changes and accommodations as needed. But

16 it's all tying back to our standards and what we want

17 our students to be able to accomplish at the end of

18 that course.

19 Q. And how are the students provided with those

20 expectations at the outset? Are they given a syllabus

21 or something of that nature, in order to give them a

22 heads up in terms of what's coming?

23 A. Right. So all of our teachers provide -- it

24 may not be a formal type of college -- we think about

25 syllabus' as being sometimes multiple pages long

Page 75

1 outlining every single project they're going to do

2 throughout the year, but our teachers all give our

3 students an overview.

4 And then what I talked about is that I allow

5 them to make changes, as they're seeing, you know, the

6 pace of their students and what they need to do in

7 order to cover that material, because they are

8 covering what would be a course that would be an

9 entire year at McCaskey in a semester just like a

10 college class would be.

11 So sometimes accommodations need to be made

12 in order to cover the material.

13 Q. And do you find that the students are

14 generally able to keep up with the 80 minute long

15 classes?

16 A. I do. Because I think 80 minutes is just

17 giving the teacher more instructional time, and then

18 it's also giving the students more time to complete

19 their assignments when they're having the teacher

20 present in the classroom, and able to answer those

21 questions firsthand.

22 Q. Okay. Are you familiar with the students in

23 this lawsuit?

24 A. I am, in fact, I'm recently familiar with

25 the three of them. I just finished attending the

Page 76

1 summer refugee program that I've coordinated for the

2 past two summers at Phoenix Academy.

3 Q. And who are they?

4 A. Avon (ph), Sui and Anyemu Dunia and then

5 also I had Khadidja's sister, Norsham and she attends

6 McCaskey, but I had in the summer program, along with

7 other McCaskey students who choose to attend the

8 program every summer.

9 Q. And what's the purpose of the summer

10 program?

11 A. So the summer program is funded through a

12 grant that I believe has come up as we've been talking

13 this week. And essentially it's to, you know, allow

14 them to get credits that they may have been behind in

15 receiving, and then also to provide them with English

16 instruction.

17 There's also a socialization piece. So

18 every Thursday, if we had, you know, good attendance

19 that week or doing well in our assessments, as a

20 reward we had soccer Thursday, and we shorten our

21 classes just by 15 minutes, and then we were able to

22 participate in that physical education activity for

23 that purpose that we talked about of, you know, having

24 them have that opportunity to practice their English

25 speaking skills in a not formal classroom setting.

Page 77

1 We also had a college visit, E-Town college

2 and then we did a field trip to Zoo America, many of

3 them weren't familiar, you know, in their home

4 countries with North American animals, so that was a

5 great opportunity for them to see.

6 Q. What about the -- why would kids from

7 McCaskey come to the summer program, are they looking

8 for -- what are they looking for?

9 A. So many of them are looking to have more

10 credits towards graduation, and then some of them are

11 just looking to, you know, be able to attend summer

12 school and learn more English. But all of the

13 students who attended this summer were able to earn

14 three additional credits toward graduation.

15 Another part of the program that I was

16 particularly proud of, is that every summer we've

17 grown, and we've grown in students from McCaskey that

18 are choosing to come and attend at Phoenix.

19 So we sent home a survey and an invitation

20 letter to each family in their home language, and they

21 were invited to attend an orientation where there was

22 a visual PowerPoint outlining the program, the credits

23 that they would be able to earn, the other

24 opportunities that we were hoping to have for them,

25 and then we also did a food survey.

Page 78

1 So something else that I feel like is unique
 2 to the program is that we were able to tailor all of
 3 the meals specifically to what our students are used
 4 to eating at home, whereas during the school year, it
 5 may not be the same way with school lunches.
 6 So many weeks I myself cooked food at home,
 7 and then brought it into school the next day, and it
 8 would be in crockpots, and very much like a family
 9 buffet style atmosphere after they had their courses.
 10 So for me, the summer program, yes, is it
 11 helping them to attain credits to graduation,
 12 absolutely; is it helping them with their English
 13 skills, but then I feel like it's also providing that
 14 kind of environment that many of them want over the
 15 summer when they're out of school and not having it.
 16 Q. So I just have one question about that and
 17 that is, why do students at McCaskey need more English
 18 if they're already in the international school?
 19 A. Well, that's a choice that many of them are
 20 choosing to make. Just like how we talked this week
 21 about seeking other tutoring opportunities outside of
 22 school. Many of them look forward to this program
 23 each year, because it's just additional support that
 24 they're receiving to go into their next school year.
 25 So it's not mandatory to attend, it's

Page 79

1 optional. Which is why I was surprised by some of the
 2 students that are in this case, because they chose by
 3 choice to attend the summer program. And if they were
 4 feeling, you know, this way, I was just surprised that
 5 they would partake in that program.
 6 Q. You mean if they didn't like the education -
 7 -
 8 A. Yes.
 9 Q. -- provided to them at the Phoenix Academy,
 10 you thought it would be odd that they would attend the
 11 summer program?
 12 A. Yes, I did not know of their unhappiness or
 13 wanting to transfer to McCaskey until I saw this
 14 lawsuit formally released.
 15 Q. What relationship do you normally have with,
 16 for example, Anyemu, would he be able to come to your
 17 door, do you have like an open door policy for these
 18 kids?
 19 A. I do, yes. So Anyemu, I've known since
 20 February 2015 when he came here, and he's chosen by
 21 choice to attend the summer program for the past two
 22 summers and earn additional credits for graduation.
 23 So even up until this school year we had
 24 that kind of relationship where I feel like we could
 25 openly talk about his experiences in school and

Page 80

1 especially like if he was feeling supported. Even
 2 this past spring he used saline eye drops for the
 3 first time and he had an allergic reaction. So I
 4 called his parents with him, and he was able to
 5 translate for him. We were able to communicate fine
 6 to make sure that he was going to get a doctor's
 7 appointment for that evening, and I was even able to
 8 provide transportation for him, so that's the type of
 9 relationship that we had.
 10 And even up until he graduated last week, we
 11 met three separate times this summer and talked about
 12 his credits. And I told him, you know, I was happy
 13 that he participated in this program. If he wanted to
 14 come back in the fall and continue his time in school,
 15 he most certainly could do that, but he expressed to
 16 me that he was ready to move on to college and that
 17 was interested in trying to work at the same time.
 18 So we talked about the option of him
 19 attending Harrisburg Area Community College. They
 20 have a branch in Lancaster, and he told me that he
 21 wanted to focus on studying biology and he felt like
 22 he was ready to graduate.
 23 So that was the plan that we moved forward
 24 for him, so that he could do that last week.
 25 Q. And do you know whether or not he's actually

Page 81

1 applied to HACC?
 2 A. I think that he has gone with his case
 3 worker and they've completed some applications. And
 4 then when we spoke at graduation I told him about
 5 going into Phoenix and looking into financial aid, and
 6 at least meeting with the guidance office there,
 7 because they do these things all the time, and I
 8 wanted to make sure that his paperwork was going to be
 9 processed correctly.
 10 Q. Okay. And what about Khadidja, did you have
 11 an open door policy with her?
 12 A. I did. Khadidja, I didn't know for as long
 13 of a time as Anyemu, but I obviously observed her in
 14 classes and greeted her every morning.
 15 Q. Were you here when she testified about her
 16 experiences at Phoenix?
 17 A. I was, yes.
 18 Q. And are those experiences -- was her
 19 testimony consistent with your observations?
 20 A. So I feel like I'm thinking very long
 21 ago. But from what I remembered with Khadidja in
 22 classes is that -- and this was also expressed to me
 23 from some of my ESL teachers, is that sometimes there
 24 was a barrier when they would be instructing her with
 25 her learning, and that they did not feel that her

Page 82

1 English learning was advancing at the same rate that
 2 some of our other students that were coming in at her
 3 same level were.
 4 So we worked to provide her with some other
 5 supports, including some one-on-one help when she
 6 would be in class, in order to help start making
 7 progress with her learning.
 8 Q. Okay. Did you see -- do you know whether
 9 that progress has been made since the last time that
 10 came to your attention?
 11 A. No, I do not. That was something that we
 12 were working on very strongly in the spring semester.
 13 But she did not choose to attend the summer program,
 14 so her sister, Norsham, who attended had a one-on-one
 15 ESL teacher. So I felt like I was able to see more
 16 progression with her sister this summer. I'm not sure
 17 about Khadidja because she did not attend.
 18 Q. Okay. And do you know from your
 19 observations or conversations with her teachers,
 20 whether it was Ms. Ortiz or one of the content
 21 teachers, whether she was reluctant to ask questions,
 22 whether she was intimidated from participating in
 23 class?
 24 A. As I see it, sometimes it did seem that
 25 there was a barrier with her progressing, and

Page 83

1 sometimes like wanting to do the practicing, even some
 2 of the basic English skills in classrooms, that was my
 3 understanding.
 4 Q. So she didn't want to?
 5 A. It seemed like sometimes the effort was not
 6 always the same, no.
 7 Q. And in terms of her pathway through to
 8 graduation, do you have a recollection in terms of
 9 where she is on that pathway, and whether there are
 10 any obstacles to getting her to the goal?
 11 A. Every student when they come into Phoenix
 12 has a graduation plan made, but it's set out with our
 13 guidance counselor that we talk about in orientation,
 14 so if she -- based on when she came in at that time of
 15 the year, I believe that she would have five and a
 16 half credits towards graduation.
 17 Q. Okay. Did you hear the testimony last week
 18 that Khadidja has a rank of one in her class?
 19 A. I have, yes.
 20 Q. Okay. And what do you make of that?
 21 A. So I don't have, you know, her report card
 22 in front of me, but what I make at that, so at
 23 Phoenix, we have a school (indiscernible) greeting
 24 rubric, and a big part of that rubric is class
 25 participation, attendance, in-class assignments and

Page 84

1 assessments.
 2 So based on what I remember of her grades
 3 and (indiscernible) that grading rubric, it could be
 4 possible that when all those things are calculated
 5 together in our E school management system, that it
 6 could calculate her as being first of whatever amount
 7 of students that would have been on there.
 8 We do not use class rank very often at
 9 Phoenix, because of the way that we're doing our
 10 credits, and students are being promoted through
 11 grades differently. So we more rely on their credits,
 12 their grades, and also their GPA, because all of those
 13 things are going to support them in getting to
 14 college.
 15 Q. So ranking isn't something (indiscernible)
 16 being important in terms of, you know, competing with
 17 --
 18 A. No.
 19 Q. -- their peers?
 20 A. It's not the same as what you would think it
 21 would mean in a traditional high school, no.
 22 Q. And how does the information reach the E
 23 school program?
 24 A. So teachers -- some teachers keep a paper
 25 based gradebook, but then they put into E school

Page 85

1 weekly. We post grades in classrooms every two weeks,
 2 so that's how students are able to know how they're
 3 progressing throughout the semester.
 4 And then every Friday, as well as students
 5 who are participating in athletics at McCaskey, it
 6 needs to be in that E school system in order for them
 7 to know if they're eligible or not to play with their
 8 grades.
 9 So it's put in by teachers, but then
 10 calculations are made, you know, according to school
 11 district policies on what equates an A, versus a B and
 12 all those formalities.
 13 Q. Okay. What about Qasin Hassan, do you know
 14 anything about his education at Phoenix?
 15 A. So Qasin only attended school I think 20 or
 16 30 days, but during that time I obviously observed him
 17 in school, you know, interacting with his peers, being
 18 in his ESL class. But I really became more aware of
 19 him and his feelings about school, when my ESL teacher
 20 and I had observed that he wasn't attending regularly,
 21 and that there had been a few (indiscernible) days, so
 22 her and I planned out a schedule when she could leave
 23 with our in-home visitor and go to his home and find
 24 out if everything was all right, because I found that
 25 to be odd behavior based on what we had known about

Page 86

1 him and his time at starting at Phoenix.

2 Q. And what did you learn when they went out to

3 the home?

4 A. So it's my understanding that when they went

5 to the home, he answered the door, and I'm not sure

6 who else was at the home when they were there, but

7 when they came back to school to debrief me on, you

8 know, was he okay, what was going on, and why he

9 wasn't attending school, it was communicated that he

10 was working or either had the desire to work.

11 So my home in school visitor told me that

12 she had left a note on how to contact her at school so

13 that we could support his family in helping them meet

14 that goal for him if that's what he wanted to do.

15 Q. Okay. And did he ever respond then to the

16 note that you left in terms of following up with the

17 folks at Phoenix to get him onto that pathway?

18 A. It wasn't related to that, no. We received

19 a call from someone else that -- so that they would be

20 attending the meeting, and that his desire wasn't not

21 to be in school, and that there were some other things

22 that we needed to discuss. And I said, then we move

23 forward with that meeting, but the meeting was no

24 longer about supporting him and finding employment.

25 Q. So who was that person who had called?

Page 87

1 A. It was Elyse Chesson.

2 Q. Okay. And then what happened with that

3 meeting, how did that turn out?

4 A. So that meeting, it was brought to our

5 attention that the reason why he wasn't attending

6 school was because he was being bullied. And that he

7 still wanted to attend school, but he didn't want to

8 attend school at Phoenix.

9 So we initiated a bullying investigation

10 where our lead behavioral support conducted many

11 interviews and classroom observations to find the root

12 if this was happening, and in that meeting, Ms. Hilt

13 also asked him, Qasin to identify five staff members

14 that he felt comfortable going to, and if he could

15 come back to school in the meantime while we started

16 this investigation, so that he didn't miss anymore

17 time in the classroom. And he said he would consider

18 doing that.

19 Q. And then what happened?

20 A. We finished the bullying investigation and

21 found that was not the case. And he did not return to

22 school.

23 Q. Has anyone reached out to him another time

24 to try to get him back?

25 A. I believe Dr. Abrams sent communication

Page 88

1 about, you know, that we had done this investigation

2 and how we wanted to support him in coming back to

3 school. And I believe he was also invited to attend

4 the summer program.

5 Q. Okay. So where does he stand now? Is he

6 still enrolled or is he not enrolled?

7 A. He is still enrolled at Phoenix, yes.

8 Q. Okay. What about Sui and Van, the two

9 sisters that came from Burma?

10 A. So both of them attended the summer program.

11 Q. Okay.

12 A. And again I had never heard of any instances

13 of them being unhappy and not wanting to attend, and

14 you know, they both participated in all of our summer

15 activities except for attending the zoo because one of

16 them was sick, so the other one stayed home with her.

17 Q. And did you have an opportunity to observe

18 them in classrooms?

19 A. I did, yes.

20 Q. Okay. And again, was there any difficulty

21 or trouble with either of these two?

22 A. No.

23 Q. Okay. What is -- to your knowledge, there's

24 80 minutes of ESL instruction at -- provided to each

25 student per day.

Page 89

1 A. So there's 80 minutes that they would have

2 as a minimum amount of time with their ESL teacher.

3 Generally it's in the morning period, so first through

4 third period. And then many of them also have a

5 communication arts class that's taught by a highly

6 qualified ESL teacher.

7 In order to be highly qualified, you have to

8 be dually certified in ESL and English language. And

9 then many of them have skills prep, which is that same

10 class that has been talked about this week that's

11 taught at McCaskey with -- and then all of their

12 classes, there's either ESL co-teaching or push and

13 support. I don't recall the exact schedule of that

14 teacher, but that would've been the supports that were

15 provided.

16 Q. And that's ESL, is that an educational

17 theory?

18 A. Teaching English as second language?

19 Q. Yes.

20 A. Yes.

21 Q. Okay. And has it been implemented at the

22 Phoenix Academy to your knowledge at -- in the same

23 way that it's implemented at the McCaskey High School?

24 A. To my knowledge, yes.

25 Q. So in the time that I was there in an

Page 90

1 administrative role, I reached out to the school
 2 district frequently, especially because each year our
 3 numbers of students who are enrolled change, in
 4 addition to how many ELL learners we would have, how
 5 many IUP students we would have, I would always make
 6 sure that I was reaching out and following what would
 7 be considered best practice in line with what the
 8 school district was doing in their schools.
 9 Q. And from your observation from the time that
 10 you've been there as the principal and the academic
 11 lead, is it working?
 12 A. Yes.
 13 Q. Okay. And give us some examples of how that
 14 might be?
 15 A. So each year, just looking at our access
 16 scores, we've had the opportunity to exit students
 17 from being in the ESL program, which I would consider
 18 as a success in evaluating if it's working.
 19 And then in addition looking at our
 20 graduation rates and how we're supporting the school
 21 district. I would say that would be appropriate data
 22 to use for that as well.
 23 Q. And is Anyemu Dunia the only immigrant
 24 refugee to your knowledge that has graduated from
 25 Phoenix?

Page 91

1 A. No, we've had several refugee students. I
 2 think the last time that we ran the data in the time
 3 that I was there, it's been about 30, and he actually
 4 graduated with one of his peers from the summer
 5 program on Tuesday who was also a refugee student.
 6 Q. And who was that?
 7 A. Sonta.
 8 Q. Oh, Sonta, okay.
 9 MS. O'DONNELL: Thank you. Those are
 10 all the questions I have.
 11 THE COURT: Thank you very much,
 12 Counselor.
 13 Attorney Walczak, you may cross-examine
 14 the witness.
 15 MR. WALCZAK: Your Honor, before I
 16 begin, I just would like to ask -- make a request of
 17 Counsel. We had asked for all assessments that were
 18 done at Phoenix, and Ms. Heisey had just testified
 19 about apparently some assessment, which we've never
 20 seen of graduation rates of refugees, and so I would
 21 ask if Ms. O'Donnell could kindly produce any report
 22 that is available on graduation rates.
 23 We had asked for that, it hasn't been
 24 produced, and then you've got a witness testifying
 25 about some apparent assessment which has not been

Page 92

1 introduced so.
 2 THE COURT: Attorney O'Donnell, would
 3 you like to respond?
 4 MS. O'DONNELL: I don't believe that --
 5 I'm not exactly sure what he's talking about. My
 6 understanding was that all documents that were
 7 requested through the request of production of
 8 documents had been fulfilled and completely. If he's
 9 talking specifically about the Access scores, I don't
 10 know that I have them, but if I do, or my clients have
 11 them, we can certainly produce them.
 12 THE COURT: Very well. Does that
 13 answer your concern?
 14 MR. WALCZAK: Well, I believe the
 15 testimony from Ms. Heisey was about the last time she
 16 looked at refugee graduation rates, we've seen nothing
 17 produced from the school district.
 18 THE COURT: And that was about 30 have
 19 graduated. Is there a way that you have statistics
 20 that you can separate out refugee students to see if
 21 they've graduated?
 22 THE WITNESS: So I was able to do that
 23 through the support of Ms. Hilt, since she has all the
 24 Access. I no longer have access to Phoenix and E
 25 schools since I'm not employed there. However, I feel

Page 93

1 like with her support it would be something that we
 2 could definitely look at.
 3 MS. O'DONNELL: Okay. Your Honor, I'm
 4 finding out from Ms. Hilt that that's not something --
 5 that's not information that's desegregated in a way,
 6 that's something that Ms. Heisey knows from her
 7 experience, but there's not a document that would
 8 reflect what she knows.
 9 THE COURT: Okay. I'll allow counsel
 10 to deal with that issue outside of the testimony.
 11 Counsel, you may cross-examine the witness.
 12 MR. WALCZAK: Thank you, Your Honor.
 13 CROSS-EXAMINATION
 14 BY MR. WALCZAK:
 15 Q. Good morning, Ms. Heisey.
 16 A. Good morning.
 17 Q. So let's just start with that last piece.
 18 So you testified about looking at graduation rates for
 19 refugees; is that correct?
 20 A. Yes, I was asked to do that.
 21 Q. And who were you asked by?
 22 A. I was supporting when we were first looking
 23 at data for this case.
 24 Q. So you didn't look at that before the
 25 lawsuit was filed?

Page 94

1 A. No, I haven't specifically focused on that
 2 prior to.
 3 Q. Okay. And as I understand it, through your
 4 counsel that apparently the data that you would have
 5 looked at was not disaggregated, meaning that it was
 6 not -- you did not have refugees from McCaskey
 7 separate from refugees at Phoenix; is that right?
 8 A. No. I individually went through it for the
 9 past five years every single graduate.
 10 Q. And did you produce some report or notes?
 11 A. It wasn't a report, but I was able to, you
 12 know, highlight the students.
 13 Q. And how did you transmit that information?
 14 A. How did I transmit --
 15 MS. O'DONNELL: (indiscernible)
 16 questions, no foundation on whether she transmitted
 17 it.
 18 Q. What did you do with that information?
 19 A. I used it to evaluate if the program had
 20 been successful in making sure these students
 21 succeeded and graduated.
 22 Q. And who did you -- did you write that
 23 information down?
 24 A. It's in a report that I was working with, I
 25 didn't go through and write that information. I don't

Page 95

1 understand the question.
 2 Q. So as a result of your review of this data,
 3 did you put anything in writing or is it just you
 4 looked at these numbers and you kept them in your
 5 head?
 6 A. I don't recall formally putting it in
 7 writing. It was something that I looked at myself to
 8 evaluate the program for myself.
 9 Q. Did you send an e-mail to anybody about the
 10 results of your review?
 11 A. I don't recall, I could have.
 12 Q. You -- your bachelor's degree is in art
 13 education and print making; is that right?
 14 A. I have two separate bachelor's degrees. One
 15 is in fine arts, which is focused on print making, and
 16 then one is specifically in art education.
 17 Q. And you were an art teacher for how many
 18 years?
 19 A. Three to four years, four years including my
 20 time student teaching.
 21 Q. Okay. So you taught a year in Los Angeles;
 22 is that right, after you graduated?
 23 A. I did, yes.
 24 Q. And then you taught for two years for
 25 Camelot; is that correct?

Page 96

1 A. That's correct.
 2 Q. So you taught at Excel Academy North in
 3 Philadelphia, which is a Camelot school; is that
 4 right?
 5 A. Yes.
 6 Q. Okay. And that's an accelerated school as
 7 well?
 8 A. Yes.
 9 Q. And then you taught in 2011 and 2012 at
 10 Phoenix; is that right?
 11 A. Yes.
 12 Q. And then in 2012, you became the principal
 13 at Phoenix; is that right?
 14 A. Acting principal, yes.
 15 Q. And you say acting because you didn't get
 16 your principal certificate until the following year,
 17 correct?
 18 A. So I was currently enrolled in an
 19 administrative program and then I completed that
 20 program in winter of 2013, and then took my exam for
 21 my principal certification in spring of 2014.
 22 Q. So you started at principal or as acting
 23 principal in 2012, you got your principal certificate
 24 from the Commonwealth in 2014; is that right?
 25 A. That's correct.

Page 97

1 Q. Okay. And you were at Camelot specifically
 2 at Phoenix until August the 3rd or 4th of this year;
 3 is that right?
 4 A. No. I believe -- well, I guess it would
 5 have been the first week of August, because I wanted
 6 to finish out the summer program, which ended I
 7 believe on July 28th.
 8 Q. So you were with Camelot for a total of six
 9 years?
 10 A. Yes.
 11 Q. And so you were with -- you were at Phoenix
 12 from the time Camelot took over, correct?
 13 A. Yes, that's correct.
 14 Q. And you were the principal of that school
 15 for four out of five years; is that right?
 16 A. Yes.
 17 Q. You began as assistant principal at McCaskey
 18 on August 4th; is that right?
 19 A. If that would've been that Monday after the
 20 28th, then yes.
 21 Q. So as of this month, you are employee of the
 22 School District of Lancaster.
 23 A. That is correct.
 24 Q. And you'd never worked at McCaskey before
 25 August, correct?

Page 98

1 A. No.

2 Q. Okay. So you don't know a lot at this point

3 about how McCaskey operates; is that right?

4 A. No. I had hoped that I would have had a

5 smoother transition to learn that before we had

6 students, but that's just not how it has been, so

7 that's okay.

8 Q. And you've been in court everyday of this

9 trial; is that right?

10 A. That is correct.

11 Q. And then you were deposed the week before

12 that; is that right?

13 A. That is correct.

14 Q. And that's probably cut into your ability to

15 actually do your day job?

16 A. Yes. Tomorrow I'll be meeting all the staff

17 for the first time.

18 Q. Good luck.

19 A. Thank you.

20 Q. Now, you were not involved in any of the

21 curriculum development for Phoenix; is that right?

22 A. That's correct.

23 Q. You used the School District of Lancaster

24 curriculum, right?

25 A. Yes.

Page 99

1 Q. And you're not on any curriculum committee.

2 A. No.

3 Q. And you don't have any input into

4 curriculum.

5 A. No.

6 Q. And you didn't play any role in developing

7 the language program at Phoenix; is that right?

8 A. No.

9 Q. You don't have an ESL certification, do you?

10 A. No, I do not.

11 Q. And you never worked as an ESL teacher.

12 A. No.

13 Q. And you never taught an ESL class.

14 A. No.

15 Q. And you're not an expert in ESL?

16 A. I would not consider myself to be a specific

17 expert in ESL; however, I would say with being in the

18 administrative leadership program and learning those

19 skills that are needed to be a leader of programs that

20 are K through 12, that that qualifies me to be able to

21 observe in that classroom.

22 Q. Okay. That wasn't my question. You don't

23 consider yourself an expert in ESL, do you?

24 A. No, I do not.

25 Q. And you wouldn't hold yourself out as an

Page 100

1 expert in ESL?

2 A. No, I would not.

3 Q. Now, would you agree with me that Phoenix is

4 not identical to McCaskey?

5 A. I do not feel like it is identical.

6 Q. And if it was identical, you wouldn't need

7 two different school; is that right?

8 A. Right.

9 Q. Now, Phoenix operates on a different program

10 than McCaskey, correct?

11 A. A different program in the sense that

12 they're a longer class periods, and then it switches

13 courses on a semester basis instead of on a year

14 rotation.

15 Q. Okay. Believe me we're going to unpack all

16 of this.

17 So Phoenix operates on an accelerated model;

18 is that right?

19 A. Yes.

20 Q. McCaskey does not, correct?

21 A. No, though I do believe they do complete

22 some credit recovery things there that would also

23 provide acceleration.

24 Q. Okay.

25 A. I realize that's not your question.

Page 101

1 Q. Right. So McCaskey does not operate on an

2 accelerated model?

3 A. Not on an accelerated model, no.

4 Q. And as I understand it, Phoenix gives

5 students 11 credits per school year; is that right?

6 A. That's correct.

7 Q. And so that would be five and a half each

8 semester, right?

9 A. Correct.

10 Q. And then there are two semesters in a school

11 year, correct?

12 A. Correct.

13 Q. So two times 5.5 is 11; is that correct?

14 A. That's correct.

15 Q. And as I understand it, McCaskey gives

16 students only seven credits a year; is that right?

17 A. That is what I have heard, I have yet to

18 learn that information for myself.

19 Q. But tomorrow maybe.

20 A. Hopefully tomorrow I'll know a lot of

21 things, yes.

22 Q. And those seven credits are actually earned

23 for attending class the entire year, correct?

24 A. The same classes the entire year.

25 Q. Right. And you testified earlier when Ms.

Page 102

1 O'Donnell was questioning you that Phoenix students
 2 can earn additional credits on top of the 11 by
 3 attending the summer program; is that right?
 4 A. The summer program and the after school
 5 extended day program, but those are all choices that
 6 are made by the student.
 7 Q. So the summer program, I believe you
 8 testified you could acquire three additional credits;
 9 is that right?
 10 A. Yes, if you qualify for the refugee status,
 11 according to the grant to participate in the program.
 12 Q. Okay. And how many credits can you earn in
 13 an after school program?
 14 A. That would depend on the days and amount of
 15 time that you attend, but it could be if a student was
 16 participating in all of the classes that are offered
 17 in the after school program, it could be an additional
 18 four.
 19 Q. So you could earn an additional four credits
 20 through after school in one semester or in two
 21 semesters?
 22 A. In one, and that's when the funding from the
 23 21st Century grant comes through. So last school
 24 year, we did not receive funding for that grant until
 25 I believe March of that year. So it all depends on

Page 103

1 the funding, same with the summer program.
 2 So if it's offered, then it's an option.
 3 Q. So sorry, I got a little confused. So last
 4 year you could earn an additional four credits each
 5 semester through the after school program or not?
 6 A. No, because we did not receive that funding.
 7 But in previous year, that's how the after school
 8 program has worked.
 9 Q. Okay. So if you have the funding and the
 10 credits are available, you could earn an additional
 11 eight credits during the two semesters of the school
 12 year by attending the after school program.
 13 A. Correct.
 14 Q. So if you have full funding, you're saying
 15 you could earn 11 credits by going just during the
 16 day, correct?
 17 A. For the whole year.
 18 Q. For the year, yes. And then you could earn
 19 an additional 8 credits by attending all of the
 20 available after school; is that correct?
 21 A. Correct.
 22 Q. And then you could earn 3 credits by going
 23 for the summer; is that correct?
 24 A. Only if you qualify to participate in that
 25 program.

Page 104

1 Q. Okay. But if you did qualify, you could
 2 earn 3 credits?
 3 A. Correct.
 4 Q. So we're going to do a lot of math here this
 5 morning. So 11 plus 8 is 19 plus 3 is 22; is that
 6 right?
 7 A. Yes.
 8 Q. So conceivably in one year, a student could
 9 earn 22 credits, one calendar year, a student could 22
 10 credits from Phoenix; is that right?
 11 A. If that was their desire.
 12 Q. And McCaskey students who are refugees and
 13 who qualify can fully participate in the summer
 14 program that you mentioned, correct?
 15 A. Yes.
 16 Q. And that is a program that is funded through
 17 a separate grant; is that right?
 18 A. Yes.
 19 Q. And it's limited to refugees, correct?
 20 A. I believe so. I don't have a lot to do with
 21 the development of that grant, I just know that
 22 enables me to run that summer program.
 23 Q. Right. And you testified that you spent a
 24 lot of time and did a lot of activities with those
 25 kids, so you're familiar with who's in there.

Page 105

1 A. Yes, with the programming.
 2 Q. And so it's just refugee students, correct?
 3 A. Yes.
 4 Q. So to that, in that sense, the kids are
 5 sheltered in that instruction, would you agree with
 6 that?
 7 A. Yes.
 8 Q. And by sheltered, the refugee children are
 9 all together, correct?
 10 A. Yes.
 11 Q. Now, both school and after school and summer
 12 programs are optional, right?
 13 A. Yes.
 14 Q. And some students might not be able to
 15 participate even though they want to; is that right?
 16 A. Yes. Some choose not to due to work or
 17 participating in a sport.
 18 Q. And you mentioned that Khadidja's sister who
 19 attends McCaskey, her name's Norsham, that she
 20 participated this past year in the summer program; is
 21 that right?
 22 A. Yes, she did.
 23 Q. Okay. And then you mentioned that you were
 24 surprised that Khadidja did not participate; is that
 25 right?

Page 106

1 A. I was surprised.

2 Q. Did you have any discussions with Khadidja
3 about why maybe she didn't participate in the summer
4 program?

5 A. Yes, I did. One day her sister, Norsham --
6 I did not personally have the conversations, but I
7 sent another home and school visit because Norsham did
8 not come up to school for the first time since we
9 started the program and I found that concerning. So I
10 sent an ESL -- two ESL teachers to her home. And
11 Khadidja answered the door and, you know, said that
12 this summer she was attending or working so she
13 couldn't attend, but that Norsham was attending.

14 And then I think we learned later that
15 working was helping her family in the home and taking
16 care of the younger siblings. And I believe that is
17 why she could not attend. But, again, that is all
18 information that I learned through my staff.

19 Q. Okay. So you learned that Khadidja, in
20 fact, was not attending because she was taking care of
21 her younger brothers and sisters while her mother
22 worked?

23 A. Yes. At first it was said working, but then
24 I understood what she meant by working.

25 Q. So in the School District of Lancaster you

Page 107

1 need 24 credits to graduate; is that right?

2 A. Yes.

3 Q. If you get only seven credits a year at
4 McCaskey then it's going to take you four years; is
5 that right?

6 A. Yes. But if you're earning seven in a year
7 you would earn more than what would be needed in that
8 four years. So then they have electives that they
9 take their senior year, or I believe in some cases
10 they can choose to do a half-day for working. But
11 that's all information that I'm learning.

12 Q. Okay. So you don't -- what you're saying is
13 you don't actually have to go to school for all four
14 years in order to get enough credits at McCaskey --

15 A. They do still --

16 Q. -- to --

17 A. -- need to attend school. Yes.

18 Q. And so, for instance, if they went three
19 years they could get 21 credits at McCaskey; is that
20 right?

21 A. Correct.

22 Q. And if they went to one of the summer
23 refugee programs, assuming they're a refugee and
24 they're qualified, that would be an additional three
25 credits, correct?

Page 108

1 A. Yes.

2 Q. Okay. And that would give them 24 credits,
3 correct?

4 A. Yes. And then they could participate in the
5 summer graduation. It would need to be the right
6 amount of 24 credits in the areas that are required.
7 So it can't -- we do have some students, it happens
8 rarely, but they're not eligible for graduation and
9 they might have 28 credits because the majority of
10 their credits are in elective courses and they didn't
11 pass the required amount of math or English that they
12 need for graduation. So sometimes those cases can
13 happen.

14 Q. Okay. So there are certain courses that the
15 State requires that students complete in order to
16 graduate; is that right?

17 A. I don't know if it's a state or a district
18 decision. But, yes, there are courses that are
19 required for graduation.

20 Q. So at Phoenix the idea is that earning 11
21 credits a year, two semesters, plus potentially some
22 extra credits that you can and should be able to
23 graduate in two years; is that right?

24 A. Yes.

25 Q. And it's possible that somebody could even

Page 109

1 graduate in 16 months; is that true?

2 A. Yes.

3 Q. And, in fact, we know one of the plaintiffs
4 in this case graduated in 16 months; is that right?

5 A. Yes, because he chose to participate in
6 summer programming for two years.

7 Q. I want to talk about the school day at
8 Phoenix. So the doors open at 7:30; is that right?

9 A. Yes.

10 Q. Yeah. So that means students can begin
11 arriving at 7:30, correct?

12 A. Yes.

13 Q. And you have something called town house at
14 the beginning of the day; is that right?

15 A. Yes. There --

16 Q. Yeah. And --

17 A. -- are three of them.

18 Q. I'm sorry. Three of them? Three different
19 town houses?

20 A. yes.

21 Q. Would that be the equivalent of a homeroom?

22 A. I think I'm not familiar with the
23 development of the Camelot model, but I believe the
24 intention was for it to be a large auditorium-style
25 homeroom for the students.

Page 110

1 Q. What time does town house start?

2 A. That honestly varies according to when the

3 bus is arriving and when we're finishing our -- then

4 the students coming in in the morning. So that time

5 isn't always a set time.

6 Q. So there isn't a particular set starting

7 time at Phoenix every morning?

8 A. Well, the starting time when doors are

9 opening is 7:30, but as far as the town house starting

10 there's not a concrete time that it's going to start

11 at this time because sometimes there are delays with

12 bussing or other things.

13 Q. Okay. So there is not a particular set

14 starting time for town house in the morning; is that

15 what you're saying?

16 A. I do not believe so, but maybe someone else

17 that you will be questioning can clarify that for you.

18 But I think the ideal time is for it to start around

19 eight. But like I said with bussing and some other

20 things sometimes those times get changed and then

21 rotations need to be changed. There's not a bell

22 schedule at the school, so when that does happen

23 changes can just be made accordingly with class times.

24 Q. And how long does town house last?

25 A. Again, that's something that varies

Page 111

1 according to what's going on during the school day.

2 So if we have testing and announcements need to be

3 made about different classes, much like sometimes how

4 homeroom could be extended depending what's going on

5 at the high school, it all depends on what's happening

6 for that day. Sometimes it could be very short and

7 some days it could be longer.

8 Q. So what would be the range of time that town

9 house would take place?

10 A. I would have to say anywhere from ten to 20

11 minutes on average. That's just an estimate.

12 Q. And so is there a set time when first period

13 begins at Phoenix?

14 A. I think -- again, in an ideal world if the

15 schedule is following it would be starting by 8:15.

16 Q. You said in an ideal world. Is there a --

17 so are you saying there is no particular set time when

18 first period starts every day?

19 A. Well, as I stated before, there's not a bell

20 schedule and when we need to make changes according to

21 things that are happening sometimes that time changes.

22 I don't have the schedule right in front of me at this

23 moment, but I would like to say that it is 8:15. But

24 that's just me guessing at this moment.

25 Q. All right. Now you've been the principal

Page 112

1 there for four years; is that right?

2 A. Right. And we've changed the schedule many

3 times each year.

4 Q. Right. And what time did first period start

5 this last year?

6 A. I think at 8:15.

7 Q. You're not sure?

8 A. No, I'm not sure because like I said we make

9 changes to that schedule. I would say that that

10 schedule is a template, but every day we're making

11 changes where we need to make them according to what's

12 happening in the school day.

13 Q. So first period could start at 8:15 or it

14 could start at 8:30, correct?

15 A. I think some days it could be later, yes,

16 depending on what was going on.

17 Q. Okay. Later than 8:30?

18 A. No, I don't think later than 8:30 as I

19 stated with my time estimate that I gave you.

20 Q. Okay. What time does school end?

21 A. Well, we have different times when we have

22 bussing and then when we have walkers leaving. But

23 generally each day is ending by 3:15.

24 Q. Okay. And you have a town hall at the end

25 of the day; is that right?

Page 113

1 A. Yes.

2 Q. Okay. What time does town hall start at the

3 end of the day?

4 A. I believe around 3 p.m.

5 Q. And, again, is it kind of flexible as it was

6 in the morning?

7 A. It can vary, yes. We operate with the

8 bussing schedule of the school district and sometimes

9 our -- just like in the morning our busses are coming

10 later or earlier depending on if there was a hold up,

11 you know, when the busses were coming and the same

12 thing can sometimes happen in the afternoon.

13 Q. Okay. So what time does the last class end

14 at Phoenix?

15 A. They go right from their last class to town

16 house, so I would say that would generally be around 3

17 p.m.

18 Q. Okay.

19 A. But like I said we make changes where

20 needed.

21 Q. So if town hall starts -- or I'm sorry --

22 town house starts at 3, then they would need to be out

23 before 3:00, correct?

24 A. They would probably transition from their

25 classes at three.

Page 114

1 Q. Transition, does that mean move from one
 2 class to another?
 3 A. Yes, it does.
 4 Q. Okay. So that takes a little bit of time to
 5 move 350 students, correct?
 6 A. Well, there's three different locations and
 7 bussing is, you know, happening, so it's not always
 8 that much time, no.
 9 Q. Okay. So you've got classes from 8:15 or
 10 8:30 to three; is that right?
 11 A. Yes.
 12 Q. Okay. And that includes a lunch period,
 13 correct?
 14 A. Yes.
 15 Q. And how long is your lunch period?
 16 A. Each lunch is approximately 20 minutes and
 17 then it shares that time with an elective class so
 18 that we can have multiple, you know, groups of
 19 students that are -- we don't have all 350 students in
 20 the caf (sic) at one time.
 21 Q. Okay. But that's 20 minutes that students
 22 are not in class, correct?
 23 A. Correct.
 24 Q. Okay. And then you also have a gym class
 25 which I believe you call fitness for life; is that

Page 115

1 right?
 2 A. There are a few different course codes, but
 3 fitness for life is one of them. Yes.
 4 Q. Okay. And those are just 80 minute classes?
 5 A. Yes.
 6 Q. So you've got 8:15 to three for
 7 instructional time minus 20 minutes for lunch and
 8 minus another 80 minutes for gym; is that right?
 9 A. So are you considering wellness and fitness
 10 not an instructional course even though it's a
 11 graduation requirement?
 12 Q. I am. Yes.
 13 A. Well, there's also a health component to it
 14 so I would say that wouldn't be accurate to disclude
 15 (sic) it. No.
 16 Q. Okay. Now the Phoenix Academy operates on
 17 the same calendar as the School District of Lancaster,
 18 correct?
 19 A. Yes.
 20 Q. So when students at McCaskey, for instance,
 21 start this coming Monday, the 29th, correct?
 22 A. Yes,
 23 Q. -- Phoenix would start on the same day,
 24 correct?
 25 A. That's correct.

Page 116

1 Q. And Phoenix ends on the same date, correct?
 2 A. As the last day of school for students, yes.
 3 Q. And if there's a holiday for the School
 4 District Phoenix observes the same holidays, correct?
 5 A. Yes.
 6 Q. And if there's a snow day Phoenix observes
 7 the same snow days, correct?
 8 A. Yes.
 9 Q. So Phoenix students attend class or have
 10 class available the same number of days as McCaskey
 11 has for its students, correct?
 12 A. Yes.
 13 Q. And I believe Pennsylvania law mandates 180
 14 days a year for students; is that right?
 15 A. I do not know the law.
 16 Q. But you're a principal, right?
 17 A. Yes. I believe that is the law.
 18 Q. Okay. And so you had to acquaint yourself
 19 with Pennsylvania law in order to become a principal;
 20 is that right?
 21 A. Yes.
 22 Q. Okay. So Pennsylvania law mandates 180
 23 days, correct?
 24 A. Yes.
 25 Q. And Phoenix does not provide in excess of

Page 117

1 the minimum required number of days, does it?
 2 A. No.
 3 Q. And do you know what hours McCaskey is open?
 4 A. I do not and that schedule has also changed
 5 this year.
 6 Q. Okay. Would you say it's approximately
 7 eight to three?
 8 A. I don't know if I can say that without
 9 knowing that.
 10 Q. Would you agree with me that Phoenix
 11 provides approximately the same number of hours of
 12 instructional time as McCaskey does?
 13 A. Well, I don't know that if I don't know the
 14 exact times of school.
 15 Q. Okay. Assuming that McCaskey is open 7:30
 16 to three would you agree with me that it -- that the
 17 two schools provide the opportunity for the same
 18 amount of instructional time?
 19 A. Yes, just in different lengths of class
 20 periods.
 21 Q. So if Phoenix students receive credit
 22 faster, which they do than the students at McCaskey,
 23 it's either because they're being taught faster or
 24 they're being taught less. Would you agree with me?
 25 MS. O'DONNELL: Objection.

Page 118

1 THE COURT: This is cross-examination.
2 I'll overrule.
3 Do you understand the question?
4 THE WITNESS: I don't know it now. Can
5 you re-ask it, please?
6 MR. WALCZAK: Sure.
7 BY MR. WALCZAK:
8 Q. So you'll agree with me Phoenix students
9 receive credits faster than they do at McCaskey,
10 correct?
11 A. They do receive more credits faster.
12 Q. And if they do that during -- having the
13 same amount of instructional time they're either
14 taught faster or they're being taught less?
15 A. Or it could be more content within that 80-
16 minute block schedule.
17 Q. So they're learning more --
18 A. With having that --
19 Q. -- in --
20 A. -- more amount of time. So there's less
21 transition. So at McCaskey I believe there are seven
22 class periods and then there's more time that's
23 allowed in the hallway to transition in between
24 classes. And at Phoenix the classes are longer, so
25 there's less transition time, and then there's a very

Page 119

1 limited amount of time that students are in the
2 hallway. And, again, that's just my understanding.
3 Q. Okay. So there's five or six class periods
4 at McCaskey?
5 A. I believe seven --
6 Q. Okay. Seven --
7 A. -- because they're earning seven credits as
8 you --
9 Q. -- class periods --
10 A. -- told me in a year.
11 Q. Yes. And there are five or six class
12 periods at Phoenix?
13 A. There are five.
14 Q. Okay. So there's two more class periods at
15 McCaskey, correct?
16 A. Correct.
17 Q. Okay. So if there's five minutes between
18 transition and there's two more transitions there may
19 be ten minutes less instruction at McCaskey per day,
20 correct?
21 A. Or their transitions could be longer. There
22 are two buildings, so sometimes more transition is
23 provided according to where their courses are. And
24 they also have a full period that's dedicated to
25 lunch, 48 minutes.

Page 120

1 Q. And -- but you don't know exactly what's
2 going on at McCaskey at this point, correct?
3 A. No. This was last year's schedule that I'm
4 telling you.
5 Q. At McCaskey or at Phoenix?
6 A. At McCaskey.
7 Q. So it's your position that Phoenix students
8 receive the same education as McCaskey students; is
9 that right?
10 A. Yes.
11 Q. So what's accelerated is how fast students
12 are taught; is that right?
13 A. Not how fast they are taught, but how much
14 information they are given within the 80-minute block
15 period.
16 Q. Okay. So if you have a set amount of time
17 to instruct students, right, and you're giving them
18 additional credits you're either giving them more
19 information or you're doing it faster?
20 A. More information within that amount of time.
21 Q. All right. Let's take an example. So
22 geometry is a math class, correct?
23 A. Yes.
24 Q. And geometry is a class that Phoenix
25 teaches, correct?

Page 121

1 A. Yes.
2 Q. Uh-huh. So at Phoenix -- or at McCaskey in
3 order to get a credit you need to go a full year,
4 correct?
5 A. Yes.
6 Q. All right. To get a geometry credit. So a
7 full year is 180 days, correct?
8 A. Yes.
9 Q. Okay. And classes at McCaskey are 48
10 minutes?
11 A. That's what I believe they were last year.
12 Yes.
13 Q. So if you multiply 180 times 48 you would
14 get 8,640 minutes. How are you at math?
15 A. I'll take your word for it. I don't have
16 any way of doing that right now, unless you --
17 Q. Okay.
18 A. -- want to give me a pen.
19 Q. I think it's something that's easily
20 verifiable, but 180 times 48 minutes is 8,640 minutes.
21 So there's 8,640 minutes of instructional time in
22 geometry to get one credit at McCaskey. If my math is
23 right would you agree with me?
24 A. Sure. If your math is right I'll agree with
25 you.

Page 122

1 Q. All right. Now at Phoenix because you're on
 2 this semester model you only have 90 days of
 3 instruction to get that one credit of geometry,
 4 correct?
 5 A. Yes.
 6 Q. Okay. But the classes are longer, right?
 7 A. Yes.
 8 Q. Okay. They're 80 minutes, right?
 9 A. Yes.
 10 Q. Okay. So if you take the total amount of
 11 instructional time you would take the 90 days of
 12 classes times 80 minutes and that's a total of 7,200
 13 minutes; is that correct?
 14 A. Again, I don't have any way of knowing if
 15 that's correct, but if I'm trusting your math I would
 16 say that that would be correct.
 17 Q. Okay. So nine times eight is 72, 90 times
 18 80 is 7,200. So there's 7,200 minutes of
 19 instructional time at Phoenix in order to get one
 20 credit, correct?
 21 A. Yes.
 22 Q. So the difference in instructional time for
 23 that one credit at McCaskey and the one credit at
 24 Phoenix is 8,640 minutes minus 7,200 minutes, so there
 25 are 1,440 less minutes devoted to instructional time

Page 123

1 for that one credit in geometry at Phoenix. Do you
 2 follow me?
 3 A. Yes. I think so.
 4 Q. So 1,440 minutes equates to 24 hours. Would
 5 you agree with that math?
 6 A. Sure.
 7 Q. So in the amount of instructional time given
 8 to students at McCaskey in order to get one credit of
 9 geometry is 24 more hours than they would get at
 10 Phoenix in order to get that one credit of geometry.
 11 Do you follow me?
 12 A. Yes.
 13 Q. Do you agree with that?
 14 A. So it's less overall instructional time,
 15 however, more instructional time when they are in the
 16 classroom. That's what I'm understanding.
 17 Q. There's more instructional time in a
 18 particular day, correct?
 19 A. Correct.
 20 Q. Okay. And the exercise we just went through
 21 assesses how much total instruction --
 22 A. For the credit.
 23 Q. Right. For the credit.
 24 A. Correct.
 25 Q. You agree with me?

Page 124

1 A. Yes.
 2 Q. Okay. So at McCaskey in order to get that
 3 one credit you would get 24 more hours of
 4 instructional time than you would to get that credit
 5 at Phoenix, correct?
 6 A. Yes.
 7 Q. And that would be the same for all credits,
 8 right, not just geometry, right?
 9 A. Some classes are only a quarter long over at
 10 McCaskey depending on the elective and what is needed.
 11 So it wouldn't be the same for all courses.
 12 Q. But if you have your major sort of state-
 13 required classes like math --
 14 A. The core classes it would most likely be the
 15 same for.
 16 Q. Core classes, correct?
 17 A. Core.
 18 Q. All right. So to get a credit in any core
 19 class at McCaskey you would get 24 more hours of
 20 instruction than you would at Phoenix to get the same
 21 credit, correct?
 22 A. I can't answer to any core credit, but I
 23 would say that would be a likely understanding. Yes.
 24 Q. Okay. Now students do not get homework at
 25 Phoenix; is that right?

Page 125

1 A. I don't think it's that they don't get
 2 homework. I think it's that there's more
 3 instructional time in the classroom for them to do
 4 their assignments. And then there's also the extended
 5 day program.
 6 Q. So students get homework, but they do it in
 7 school, correct?
 8 A. They can do it in school, yes, as in many
 9 schools.
 10 Q. Okay. Now students are not allowed to take
 11 books home from Phoenix, are they?
 12 A. They are not. No.
 13 Q. Okay. And students do not regularly get
 14 assignments photocopied to go home, do they?
 15 A. I wouldn't say it's not a regular
 16 occurrence. I think it depends on the class and the
 17 teacher --
 18 Q. Okay.
 19 A. -- and the student and how often they have,
 20 you know, missed school or had makeup work or whatever
 21 the issue may be.
 22 Q. Okay. And you sat in this courtroom and
 23 heard our six plaintiffs or five of the plaintiffs who
 24 actually attended Phoenix testify, did you not?
 25 A. Yes, I did.

Page 126

1 Q. Okay. And you heard all of them say that
 2 they never brought a book home or never brought
 3 photocopied materials home, didn't you?
 4 A. I did hear them say that. Yes.
 5 Q. Okay. And are -- you're not saying that
 6 they were lying, correct?
 7 A. I'm saying that I don't think that is the
 8 norm and that many students choose to complete their
 9 work in school.
 10 Q. They choose to do the work in school; is
 11 that what you're saying?
 12 A. What I'm saying is that as I just said they
 13 can start their assignment and work on it in their
 14 class with their teacher or in an afterschool program.
 15 Q. Okay. So if the students are working on
 16 homework or assignments in class, then that's less
 17 time for the teacher to provide actual instruction, is
 18 that right, like standing in the front --
 19 A. Unless you're not considering a teacher
 20 working with students one on one and in small groups
 21 and in pairs them giving instruction, just not maybe
 22 facilitating a direct lecture. So I think there are
 23 different types of instruction.
 24 Q. Sure. I appreciate that. And so Ms. Hill
 25 talked about the benefits of I think she called it

Page 127

1 differentiated instruction; is that right? Is that
 2 what it's called?
 3 A. It -- when you're teaching students that are
 4 different levels and give -- and providing that that's
 5 differentiation. Yes. I don't recall her
 6 specifically speaking to that, but --
 7 Q. But you would agree that if you have
 8 different levels of students in the class that it's
 9 good for the teacher to spend time with students who
 10 are grouped at each, say, language level separately?
 11 A. I think it could be language levels. I
 12 think it could be learning needs and abilities. I
 13 think it could be many things. You can use
 14 differentiation in many ways, not just with ELLs.
 15 Q. Okay. And so would it be typical to have,
 16 perhaps, three different groups that you're
 17 differentiating within a single classroom?
 18 A. Depending on the class, yes.
 19 Q. And so -- and you would expect that the
 20 teacher would spend some time with each group; is that
 21 correct?
 22 A. Yes. It could also, too, depend on the
 23 course that it is. Some courses have rotations that
 24 are already built into the activities doing that for
 25 the teacher.

Page 128

1 Q. Okay. And so if there are three groups and
 2 a teacher is spending time with one group, then she's
 3 -- she cannot simultaneously be spending time with
 4 another group, correct?
 5 A. Not that same teacher, but there's also co-
 6 teaching models, push and support, other ways that
 7 that could be provided.
 8 Q. Okay. Let's talk about that. You mentioned
 9 co-teaching and pushing. Is it your testimony today
 10 that every core content class or every class at
 11 Phoenix is co-taught?
 12 A. No.
 13 Q. Okay. Is it your testimony that there is
 14 push in at every class at Phoenix?
 15 A. There is not push in at every class at
 16 Phoenix, no.
 17 Q. And so there are classes that students would
 18 take where there's only one teacher, correct?
 19 A. Yes.
 20 Q. Okay. And that one teacher is not -- may or
 21 may not be ESL certified, correct?
 22 A. Yes. It would depend on the need of the
 23 students that are in the classroom.
 24 Q. Depends on the need. So if there are
 25 students who are, say, entering level in a particular

Page 129

1 class. Let's say there's two, you would send in --
 2 you would push in an additional teacher, or how does
 3 that work?
 4 A. Well, it would depend on the class, the
 5 grouping, the schedules of the teachers. I wouldn't
 6 be able to speak specifically to --
 7 Q. Okay. So --
 8 A. Not without knowing that information.
 9 Q. You heard five of the plaintiffs in this
 10 case testify that they never had particular help from
 11 another teacher in the classroom, did you not?
 12 A. I did. Yes.
 13 Q. Okay. Were they lying?
 14 A. I think that sometimes there are people that
 15 are in and out of our classrooms all the time and you
 16 don't always know if it's a teacher that's being
 17 specifically provided to you. And I would say that we
 18 don't always even communicate that to the students
 19 when they're in the classroom. So in our -- in our
 20 model as well there are teachers that observe other
 21 teachers. I think there are people that are in and
 22 out a lot and sometimes you might not know if that
 23 teacher is there specifically to support you.
 24 Q. So if you're a student sitting in a class
 25 and there's another person in the class and you don't

Page 130

1 realize that that person is there to help you in
 2 particular or to instruct you does that count as co-
 3 teaching or push in?
 4 A. I -- if that person would be up and
 5 delivering in the instruction I would say that would
 6 be more co-teaching. If they're pushing in to support
 7 the content that's being delivered to the students,
 8 then I would call that pushing in.
 9 Q. Okay. But you're not claiming that you've
 10 got co-teaching or push in in every class that the
 11 kids are -- every non-ESL class that the kids are
 12 taking; is that right?
 13 A. I'm sorry. Could you repeat that?
 14 Q. You are not claiming that you do co-teaching
 15 or push in for every non-ESL class at --
 16 A. No, not --
 17 Q. -- Phoenix?
 18 A. -- in every non-ESL class. No.
 19 (Pause)
 20 Q. Now Anyem Dunia (ph) you testified that you
 21 knew him and apparently spent lots of time talking to
 22 him, correct?
 23 A. Yes. I would say that we had a strong
 24 relationship.
 25 Q. Okay. In any of those meetings that you had

Page 131

1 with him did you have an interpreter?
 2 A. No. I never needed an interpreter to
 3 communicate with him.
 4 Q. You had no problem communicating with him?
 5 A. No, I did not.
 6 Q. Okay. Now Anyem is -- graduated last week,
 7 correct?
 8 A. Yes.
 9 Q. And he's currently 18 years old; is that
 10 right?
 11 A. Yes.
 12 Q. So if you had not graduated him then he
 13 actually has three more years of eligibility for a
 14 free public education; is that right?
 15 A. I did not graduate him. He chose to
 16 graduate by attending two years of the summer program.
 17 Q. And do you know his brother, Alembe?
 18 A. I do not.
 19 Q. Okay. He never attended Phoenix, did he?
 20 A. I do not know him. I don't think that he
 21 did. No.
 22 Q. Now if he enrolled at the -- if he had been
 23 enrolled at the same time as his brother, then he,
 24 too, could have graduated from Phoenix, correct?
 25 A. That would have depended on like his prior

Page 132

1 schooling that he brought with him, if he wanted to
 2 attend the summer program. So that would have been
 3 his choice.
 4 Q. Okay. If he worked every bit as hard as his
 5 brother, Anyem, then Alembe could have graduated
 6 within the time within the last 16 months; is that
 7 right?
 8 A. If he was enrolling at the same time as
 9 Anyem and he was 19, is that your question?
 10 Q. Yes.
 11 A. Yes.
 12 Q. If you could turn to Exhibit 19 in Folder 1.
 13 (Pause)
 14 Q. This is the Phoenix Academy student
 15 handbook; is that right?
 16 A. Yes.
 17 Q. Okay. And this is for the 2015-2016 school
 18 year; is that right?
 19 A. Yes. That's what it says.
 20 Q. Okay. And because it has a date on it can I
 21 infer that it's revised every year?
 22 A. I think that it is revised every year. I
 23 don't have a part in that process, but I would assume
 24 so. Yes.
 25 Q. Okay. And it says student handbook so it's

Page 133

1 for the students; is that right?
 2 A. Yes.
 3 Q. Okay. And it's given to the students,
 4 correct?
 5 A. I -- yes. And I think it's also given to
 6 parents at orientation.
 7 Q. And because you're giving it to students and
 8 telling them about the school, it's accurate, correct?
 9 A. I would think it would be. Yes.
 10 Q. Okay. And you don't want to mislead your
 11 students or their parents, do you?
 12 A. No.
 13 Q. And you don't translate this handbook into
 14 any other language, do you?
 15 A. I believe that it's in Spanish.
 16 Q. Okay. You don't translate it into Swahili?
 17 A. I don't think so. No.
 18 Q. Okay. You don't translate it into Arabic?
 19 A. No.
 20 Q. You don't translate it into Hakha Chin?
 21 A. No.
 22 Q. Okay. You don't translate it into
 23 Portuguese?
 24 A. No.
 25 Q. Okay.

Page 134

1 A. Those services would be available if it
 2 needed to be translated. That was how I was able to
 3 translate all the letters for my summer program.
 4 Q. Okay. But to your knowledge this has never
 5 been --
 6 A. To my knowledge, no.
 7 Q. I'm sorry. Let me finish my question. So
 8 this has never been translated into one of these other
 9 languages that the plaintiffs speak, correct?
 10 A. No, including the ones you listed.
 11 (Pause)
 12 Q. Now if you would go to the two, three, four,
 13 five, sixth page of this exhibit. It has the number
 14 one on the bottom, but there are many pages with the
 15 number one. So at the top it says program goals. Do
 16 you see that?
 17 A. Yes.
 18 Q. Okay. And under that it says, "Phoenix
 19 Academy has three basic goals as a program for all
 20 students." Did I read that correctly?
 21 A. Yes.
 22 Q. Okay. And the first one listed there is to
 23 recover credits needed for graduation; is that right?
 24 A. Yes.
 25 Q. Okay. And that's the very first goal

Page 135

1 listed; is that right?
 2 A. Yes.
 3 Q. Okay. Is that a -- is that -- would you say
 4 that's the preeminent goal of the institution?
 5 A. That their ultimate goal is that all
 6 students would require -- acquire the credits that
 7 they need for graduation?
 8 Q. Yes.
 9 A. Yes.
 10 Q. Is that the most important goal?
 11 A. I think that it is. Yes.
 12 Q. Okay. And then the second goal listed there
 13 is to change behavior from anti-social to pro-social;
 14 is that right?
 15 A. That's what it says. Yes.
 16 Q. Okay. What behavior have our refugee
 17 students engaged in that you would call anti-social?
 18 A. I wouldn't be able to speak to that.
 19 Q. Okay. Are you aware of any anti-social
 20 behavior by any of the five refugee plaintiffs who
 21 attended Phoenix?
 22 A. No.
 23 Q. Okay. Is there any anti-social behavior
 24 that needs to be changed in them?
 25 A. No.

Page 136

1 Q. Okay. And the third one is to develop life
 2 skills that will help sustain this change; is that --
 3 did I read that correctly?
 4 A. Yes.
 5 Q. Okay. And the change is referring to the
 6 preceding entry which is about changing behavior from
 7 anti-social to pro-social; is that right?
 8 A. Yes.
 9 Q. Okay. So none of those three program goals
 10 relate to academic proficiency, do they?
 11 A. No.
 12 Q. And none of them relate to language
 13 proficiency, do they?
 14 A. No.
 15 Q. Let's look below that, and there are student
 16 goals. There are five student goals; is that correct?
 17 A. Yes.
 18 Q. Okay. And I'm just going to read them
 19 quickly. One is to achieve 90 percent or better
 20 attendance record; is that correct?
 21 A. Yes.
 22 Q. Second, to complete 90 percent of
 23 assignments given to them, and then in parentheses it
 24 says green academic rating. Did I read that
 25 correctly?

Page 137

1 A. Yes.
 2 Q. Okay. The third is to achieve "firebird
 3 status" and again in parentheses it says behavior
 4 rating; is that right?
 5 A. Yes.
 6 Q. Okay. And then it's to earn 5.5. credits
 7 each semester; is that right?
 8 A. Yes.
 9 Q. And then to complete these requirements in
 10 order to be promoted to the next level/graduate,
 11 correct? Did I read that correctly?
 12 A. Yes.
 13 Q. Okay. Now none of these student goals
 14 relate to academic proficiency either, do they?
 15 A. Well, I feel like coming to school and
 16 completing your assignments, that's only going to
 17 improve your academics --
 18 Q. Okay.
 19 A. -- and your proficiency. So I would see
 20 that's how those things are connected.
 21 Q. But there's nothing specifically here about
 22 achieving any level of academic proficiency. It's
 23 about attending and doing your assignments, correct?
 24 A. But what I'm saying is that doing those
 25 things are going to improve your academic proficiency.

Page 138

1 Q. Okay. But a separate goal for the students
 2 listed here is not some basic level of academic
 3 proficiency, is there?
 4 A. No. There's not a separate goal
 5 specifically to that.
 6 Q. And there's nothing here about preparation
 7 for college, is there?
 8 A. There is nothing written there about that
 9 specifically, but it says, you know, next level
 10 graduate.
 11 Q. All right. If you would turn to Exhibit 21.
 12 MS. O'DONNELL: I'm sorry, Counsel.
 13 Which exhibit was that?
 14 MR. WALCZAK: 21.
 15 MS. O'DONNELL: The last one you worked
 16 with?
 17 MR. WALCZAK: Oh, the last one. I'm
 18 sorry. That was 19.
 19 MS. O'DONNELL: Thank you.
 20 MR. WALCZAK: Program handbook. Stop
 21 me if you're --
 22 BY MR. WALCZAK:
 23 Q. Are you -- have you opened the tab for
 24 Exhibit 21?
 25 A. I did.

Page 139

1 Q. And to make sure we're on the same exhibits
 2 this is the McCaskey High School Campus 2015-2016
 3 curriculum guide.
 4 A. Yes.
 5 Q. It says on the bottom it was revised
 6 11/18/14; is that right?
 7 A. Yes.
 8 Q. Okay. And this is 104 pages. Do you know
 9 that?
 10 A. No. I did not know how many pages it was.
 11 Q. Okay. Do you dispute that it's 104 pages?
 12 A. Would you like me to count them?
 13 Q. No. I think -- we don't need to take that
 14 time. I'll represent to you --
 15 A. It's very large. Yes.
 16 Q. It is very large. Now Phoenix does not have
 17 a similar curriculum guide for its students, does it?
 18 A. No. We follow this one.
 19 Q. Okay. But Phoenix does not offer everything
 20 to its students that would be included in this
 21 curriculum guide, does it?
 22 A. No.
 23 Q. So, for instance, there's no advance
 24 placement classes offered to students at Phoenix, is
 25 there?

Page 140

1 A. No.
 2 Q. Okay. And there are advanced placement
 3 courses offered at McCaskey, correct?
 4 A. Yes.
 5 Q. Okay. And McCaskey also is -- and I think
 6 the School District of Lancaster is proud, justifiably
 7 proud, to have something called an international
 8 baccalaureate program. Are you familiar with that?
 9 A. The IB program. Yes.
 10 Q. Yes. So IB is short for international
 11 baccalaureate, correct?
 12 A. Yes.
 13 Q. Yeah. And that is a prestigious academic
 14 program and there's only a handful of them available
 15 at high schools across Pennsylvania; is that right?
 16 A. Yes. High schools and other grade levels.
 17 Q. Okay. And Phoenix does not offer an
 18 international baccalaureate program, do they?
 19 A. Last year they did not, however this year
 20 they were invited to participate in the IB middle
 21 years program. I don't know what that is going to
 22 look like moving forward, but that was happening when
 23 I was still principal there.
 24 Q. You're saying there may be something in the
 25 future?

Page 141

1 A. Yes. Next year they may start
 2 implementation for the IB middle years program and
 3 then that would -- could translate into high school.
 4 Q. Okay. For middle years that would be under
 5 age 17, correct?
 6 A. Correct.
 7 Q. Okay. So that would not be something that
 8 could benefit 17 to 21 year olds, correct?
 9 A. No.
 10 Q. Okay.
 11 A. Not currently in that program.
 12 Q. And McCaskey has international baccalaureate
 13 program for high school age students, correct?
 14 A. Currently, yes.
 15 Q. Right. And you can actually get a -- what's
 16 known as an IB diploma by going eleventh and twelfth
 17 grade and taking an entire IB course; is that right?
 18 A. Yes.
 19 Q. You can't do that at Phoenix?
 20 A. Currently, no.
 21 Q. Okay. If you would turn to page 7 of
 22 Exhibit 21. Do you see this? It says, diversified
 23 occupations program. Do you see that?
 24 A. Yes.
 25 Q. And I'm going to read the first paragraph

Page 142

1 under that entry. It says:
 2 "The diversified occupations program is a
 3 vocational cooperative education program
 4 created by the Department of Education
 5 offered at academic high schools. It
 6 combines classroom instruction with on the job
 7 training in a career area of the student's
 8 choice. This unique program is designed to int
 9 Did I read that correctly?
 10 A. Yes.
 11 Q. Okay. And the next paragraph it talks about
 12 how this is a partnership between local businesses and
 13 the McCaskey career and technical educational program,
 14 correct?
 15 A. Yes.
 16 Q. Okay. Phoenix does not have a diversified
 17 occupations program, does it?
 18 A. No. But students are able to participate in
 19 the CTC.
 20 Q. What is CTC?
 21 A. Career and technology center.
 22 Q. Okay. Diversified occupations program is
 23 something different, isn't it?
 24 A. Well, it says it's in partnership between
 25 the career and educational program.

Page 143

1 Q. But it is a different program than going to
 2 the career and technical center, isn't it?
 3 A. I don't know about this program.
 4 Q. Okay. Whatever is described here, this
 5 particular program is not available at Phoenix,
 6 correct?
 7 A. No.
 8 Q. And at the last sentence of that second
 9 paragraph under diversified occupation it says:
 10 "Diversified occupation serves heterogeneous
 11 groups of students whose career objectives
 12 cannot be met by attending any of the existing
 13 programs offered by the local career and
 14 technical education programs."
 15 Did I read that correctly?
 16 A. Yes.
 17 Q. Okay. So that's a lot of opportunities for
 18 actually getting a job in the community that are
 19 available to students in this program, correct?
 20 A. It seems that way.
 21 Q. Okay. And that's not available to the
 22 students at Phoenix, correct?
 23 A. No.
 24 Q. Now if you'll turn to page 17. You'll see
 25 about halfway down the page it says, "Approved NCAA

Page 144

1 courses at McCaskey High School campus." Do you see
 2 that?
 3 A. Yes.
 4 Q. Okay. So approved NCAA courses means that
 5 if you take one of these courses they are accounted
 6 for NCAA eligibility, especially athletics; is that
 7 right?
 8 A. Yes.
 9 Q. Okay. There's an awful lot of courses
 10 listed on pages 17 through 19. Would you agree with
 11 me?
 12 A. Yes.
 13 Q. Several hundred, correct?
 14 A. Sure. I know you like counting.
 15 Q. Yes. I'm not saying I'm any good at it, but
 16 we're going to do a bit of it. And all of the courses
 17 that are listed here are not available at Phoenix,
 18 correct?
 19 A. That is correct.
 20 Q. Okay. And in particular let's say a student
 21 was interested in biology, correct? If you'll look on
 22 page 18 at the bottom of the first column there are
 23 five biology classes listed at the bottom? Actually,
 24 it may be six, five or six bio classes, correct?
 25 A. Yes.

Page 145

1 Q. Okay. And then at the top of the next
 2 column on page 18 there's another dozen or so,
 3 correct?
 4 A. Yes.
 5 Q. So there are about 20 different biology
 6 courses that a student who has an interest, for
 7 instance, in biology could take advantage of if he or
 8 she were at McCaskey, correct?
 9 A. Yes.
 10 Q. Okay. Now let's go to page 19. Now there's
 11 been some discussion of small learning communities,
 12 but I'm not sure that's been fully explained. Were
 13 you in the courtroom for Mr. Blackman's testimony,
 14 correct?
 15 A. Just today, yes.
 16 Q. Yes. And I believe he testified how the
 17 small learning communities arose from a Gates
 18 Foundation grant in the early 2000s, correct?
 19 A. I don't know that information, but that's
 20 what I learned. Yes.
 21 Q. Okay. And I learned it as well along with
 22 you. And so I'm going to read the first paragraph
 23 there. It says:
 24 "Beginning with the ninth grade class in
 25 2000 School District of Lancaster implemented

Page 146

1 a more personalized learning
 2 environment by creating small learning
 3 communities, SLCs. Small learning communities c
 4 students and staff might come together in a
 5 small learning community devoted to the
 6 visual and performing arts, or one focused on
 7 science and technology. While all students
 8 take the same core curriculum, the electives off
 9 Did I read that correctly?
 10 A. Yes.
 11 Q. Okay. And let me -- I'm just going to read
 12 one more paragraph:
 13 "The small learning communities offer
 14 students a number of advantages:
 15 Personalized learning, electives that
 16 match student interests, and targeted support.
 17 Smaller, more intimate grouping increases
 18 student achievement and decreases feelings of iso
 19 develop more meaningful relationships with
 20 students and their families. As a result,
 21 students are provided with personal and
 22 individual teaching and learning
 23 opportunities based on their strengths and
 24 needs."
 25 Did I read that correctly?

Page 148

1 Q. Okay. Now Phoenix does not have SLCs,
 2 correct?
 3 A. No.
 4 Q. If you turn to page 25 -- well, first of
 5 all, let me just ask you. It appears, would you agree
 6 with me, that from 21, I believe it's through page 91
 7 there is an examination of the courses available in
 8 each of these SLCs? Would you agree with me?
 9 A. It talks about arts and humanities, IB and
 10 honors and -- yes.
 11 Q. Right. So it -- it's a discussion of the
 12 types of courses that the students can take if they're
 13 in one of these SLCs, correct?
 14 A. Yes.
 15 Q. Okay. So if you turn to page 25 -- are you
 16 with me?
 17 A. Yes.
 18 Q. So is this McCaskey Institute of Technology
 19 called MIT SLC, correct?
 20 A. Yes.
 21 Q. And this is designed for students interested
 22 in future studies in the sciences, mathematics,
 23 engineering and computer technology. Did I read that
 24 correctly?
 25 A. Yes.

Page 147

1 A. Yes.
 2 Q. It sounds like a great program. Would you
 3 agree with me?
 4 A. Yes.
 5 Q. And if you turn to page 19 -- I'm sorry,
 6 page 20, next page, about halfway down the page it
 7 says: "Our students assigned to an SLC." Do you see
 8 that?
 9 A. Yes.
 10 Q. Okay. And then next to it, it says,
 11 "Students select the SLC that best fits their
 12 interest." Did I read that correctly?
 13 A. Yes.
 14 Q. And if you turn to page 21 there's a chart
 15 that lists the various SLCs; is that right?
 16 A. Yes.
 17 Q. Okay. So you've got health careers,
 18 international school, public leadership and service;
 19 school to work; arts and humanities. You've got all
 20 different SLCs, correct?
 21 A. Yes.
 22 Q. And each of those provides this small
 23 community of kind of likeminded students with common
 24 interests, correct?
 25 A. That's what it seems.

Page 149

1 Q. Okay. So this would be an SLC that might be
 2 good for a student who has an interest in the
 3 sciences, for instance, or biology, correct?
 4 A. Sure. Yes.
 5 Q. Can you turn to page 29, please?
 6 A. This is McCaskey School of Health Sciences,
 7 SLC; is that correct?
 8 A. Yes.
 9 Q. And this program it reads:
 10 "Provides students with the opportunity to
 11 study basic medical concepts and careers
 12 in allied health fields. Students who aspire
 13 to careers in health fields like nursing,
 14 radiology and operating room technology gain
 15 early access to work-based
 16 experiences and technical training. Learners
 17 spend time in clinical laboratory sites at
 18 Lancaster General Hospital and other
 19 allied health partners. Students will be
 20 better prepared to pursue a post-secondary
 21 education or employment in a health career
 22 having had these experiences."
 23 Did I read that correctly?
 24 A. Yes.
 25 Q. Sounds like a terrific program to help

<p style="text-align: right;">Page 150</p> <p>1 students actually get gainful employment once they 2 graduate from high school, correct? 3 A. Yes, especially if they're interested in the 4 health sciences. 5 Q. Absolutely. And if you would turn to page 6 33. There's a similar SLC program for students with 7 the -- "provide students with the foundation they need 8 to become active and intelligent participants in media 9 careers"; is that correct? 10 MS. O'DONNELL: Your Honor, I would be 11 willing to stipulate that the entire book is a great 12 curriculum. 13 MR. WALCZAK: We'll gladly accept that 14 stipulation, Your Honor. 15 MS. O'DONNELL: Okay. 16 THE COURT: I don't know if it's going 17 to shorten the questioning, but it was a great idea. 18 (Laughter) 19 MS. O'DONNELL: I was hoping that 20 perhaps if I simply stipulated that these small 21 learning communities are offered and they're all great 22 programs, we could -- 23 MR. WALCZAK: Just -- 24 MS. O'DONNELL: -- dispense with this 25 line of questioning.</p>	<p style="text-align: right;">Page 152</p> <p>1 A. I wouldn't make that assumption. 2 Q. Okay. They may be for kids who are 3 interested in college, but they would also be good for 4 the students who might not want to go to college, 5 correct? 6 A. I think it could be good for any student 7 regardless of what their post-secondary intentions 8 are. 9 Q. And it would improve their chances of going 10 out and getting a good job, correct? 11 A. Yes. 12 (Pause) 13 Q. If you would turn to Exhibit 86, I believe 14 that is in the second day binder. 15 MS. O'DONNELL: Your Honor, we don't 16 have an Exhibit 86. 17 (Pause) 18 MS. O'DONNELL: Oh, you know what? 19 It's at -- it is here. It's just not -- 20 THE COURT: Interscholastic athletic 21 opportunities disclosure. 22 MS. O'DONNELL: -- on the index. Yes. 23 I'm sorry. We do. 24 THE COURT: Oh, no problem at all. 25 BY MR. WALCZAK:</p>
<p style="text-align: right;">Page 151</p> <p>1 THE COURT: I guess -- 2 MR. WALCZAK: Just a couple of more, 3 Your Honor. 4 THE COURT: Perhaps a more precise 5 stipulation from the plaintiff's table would be that 6 McCaskey is a much better program than Phoenix. 7 MS. O'DONNELL: I can't do that. 8 THE COURT: You may continue, Counsel. 9 BY MR. WALCZAK: 10 Q. Turn to page 38. Technical and business 11 careers SLC; is that right? 12 A. Yes. 13 Q. Okay. And then towards the bottom it says: 14 "The T&B careers SLC offers seven state- 15 certified career and technical programs 16 which include building trades maintenance, 17 business careers, computer-aided drafting and 18 design; cosmetology; early childhood 19 education; electronics," correct? 20 Did I read those -- 21 A. Yes. 22 Q. -- correctly? All right. So those would 23 all be really good for the students who might not have 24 the interest or aptitude to go to college; is that 25 right?</p>	<p style="text-align: right;">Page 153</p> <p>1 Q. Do you -- are you on Tab 86 there? 2 A. I am. 3 Q. Okay. And at the top it says, 4 "Interscholastic athletic opportunities disclosure 5 form 15.6." Did I read that correctly? 6 A. Yes. 7 Q. Okay. And this is for the 2014-'15 school 8 year, correct? 9 A. Yes. 10 Q. Okay. Do you know what this form is? 11 A. I've never seen this form before. 12 Q. If you'll look down with me it says, LEA 13 name there. Do you see that row? It's the top row 14 under LEA and school information. Do you see where it 15 says Lancaster SD? 16 A. Yes. 17 Q. Okay. So LEA name Lancaster School 18 District? 19 A. Yes. I do see that. 20 Q. Correct? Okay. And do you see where it 21 says school name it says, Phoenix Academy; is that 22 correct? 23 A. Yes. 24 Q. Okay. And there's an address below that. 25 Is that the address for Phoenix Academy?</p>

Page 154

1 A. Yes.

2 Q. Now towards the bottom it says, does this

3 school sponsor any interscholastic athletic teams. Do

4 you see that?

5 A. Yes.

6 Q. And then next to that it says, no. Do you

7 see that?

8 A. Yes.

9 Q. Okay. And if you'll turn the page it asks

10 for total number of participants in a whole range of

11 sporting activities. Do you see that?

12 A. Yes.

13 Q. Yeah. Are there any sports in which this

14 indicates that Phoenix students participate in?

15 A. It wouldn't be included under Phoenix

16 because they participate with McCaskey.

17 Q. Okay. Now if you'll come back to the first

18 page of Exhibit 86. Okay. At the very bottom it

19 says, stop. Do you see that?

20 A. Yes.

21 Q. Okay. And indeed it says at the very top,

22 if your answer to the above question, which is whether

23 you have any interscholastic athletic teams, it says

24 stop, right? And so it says, no. So obviously stop,

25 correct?

Page 155

1 A. Yes.

2 Q. Yeah. And then below that it says, "If you

3 have athletes playing for another school please

4 explain on page 4." Did I read that correctly?

5 A. Yes.

6 Q. Okay. Now if you'll turn to the second to

7 last page of the exhibit is probably the easiest way

8 to -- okay. And near the top -- are you with me?

9 Okay. Near the top there it should say, page 4,

10 Section I, comments.

11 A. Yes.

12 Q. Do you see that? So the first page referred

13 where you are supposed to explain students playing at

14 another school on page 4, correct?

15 A. Yes.

16 Q. Okay. So this is now page 4, Section 1, it

17 says comments, correct?

18 A. Yes.

19 Q. Okay. There's nothing entered there under

20 comments, is there?

21 A. No. There's not.

22 Q. Let's come back to Plaintiff's Exhibit 21.

23 And if you'll turn to page 11, please.

24 A. Okay.

25 Q. So we're looking at the 2015-'16 curriculum

Page 156

1 guide, and you see about halfway down it says --

2 there's an international school. Do you see that?

3 A. Yes.

4 Q. Okay. That's one of the programs that's

5 available at McCaskey, correct?

6 A. Yes.

7 Q. Okay. Now Phoenix does not have an

8 international --

9 (Audio recording ended at 12:32:00 p.m.)

10 * * * * *

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Page 157

1 CERTIFICATIONS

2

3 I, Sheila G. Orms, certify that the

4 foregoing is a correct transcript from the official

5 electronic sound recording of the proceedings in the

6 above-entitled matter.

7

8 _____

9 SHEILA ORMS, APPROVED TRANSCRIPTIONIST

10

11 _____

12 Sherri L. Breach

13 AAERT Certified Electronic Reporter & Transcriber

14 CERT*D-397

15

16 Dated: August 23, 2016

17

18

19

20

21

22

23

24

25

&	17011 2:4	2016 1:4 24:23	4th 97:2,18
& 2:3 157:13	18 9:1,6 13:9 57:1	157:16	5
0	62:1,8 63:18 65:11	21 13:22 14:2 20:10	5 3:3
03881 1:3	66:19 131:9 144:22	54:10 55:12 56:22	5.5 101:13
1	145:2	57:4 58:24 61:10,11	5.5. 137:6
1 38:10 40:22	180 73:20 116:13,22	107:19 138:11,14	53 3:3
132:12 155:16	121:7,13,20	138:24 141:8,22	57 31:10
1,440 122:25 123:4	1800 1:24 2:24	147:14 148:6	5:16 1:3
1-888-777-6690 1:25	1801 1:24 2:24	155:22	6
2:25	18th 1:11	21st 24:22 102:23	60173 1:18
10 9:6	19 9:1,11,15,24	22 1:4 104:5,9,9	69 3:4
100 2:3	14:14 16:23,23,24	23 157:16	7
104 139:8,11	34:1,2,6 57:3 65:11	24 107:1 108:2,6	7 141:21
10:45 68:7	104:5 132:9,12	123:4,9 124:3,19	7,200 122:12,18,18
10th 30:6 32:10	138:18 144:10	25 148:4,15	122:24
33:24	145:10 147:5	28 67:10 108:9	72 122:17
11 15:7 101:5,13	19102 1:18	28th 97:7,20	75 19:5
102:2 103:15 104:5	19103 1:12,22,24	29 149:5	8
108:20 155:23	2:24	29th 115:21	8 103:19 104:5
11/18/14 139:6	19107 1:16	2nd 30:12 31:19	8,640 121:14,20,21
12 73:24 99:20	1st 30:16,17	3	122:24
12:32:00 156:9	2	3 103:22 104:2,5	80 19:5,9 65:7 75:14
12:34 1:5	2,800 70:5	113:4,16,22	75:16 88:24 89:1
13 56:9 60:19 61:7	2,900 67:10	3,000 67:14	115:4,8 118:15
61:12 62:2,6	20 57:3 85:15	30 85:16 91:3 92:18	120:14 122:8,12,18
1315 1:15	111:10 114:16,21	3000 1:12	83 22:4,7 38:1
14 60:19 61:7,12	115:7 145:5 147:6	313 1:21	85 19:9,10
62:6	2000 145:25	33 150:6	86 152:13,16 153:1
15 36:4 76:21 153:7	2000s 145:18	350 67:11 70:5	154:18
15.6. 153:5	2001 8:7 65:17	114:5,19	87 9:5
15213 1:21	2002 8:7 65:17	38 151:10	8:15 111:15,23
16 3:3 40:11,21,23	2003 8:7 66:14	397 157:14	112:6,13 114:9
109:1,4 132:6	2004 66:14	3:00 113:23	115:6
155:25	201 2:4	3:15 112:23	8:30 112:14,17,18
16th 38:8,15	2011 96:9	3rd 97:2	114:10
17 9:7 12:13 13:20	2012 71:5 96:9,12	4	8th 17:20
13:22,22 14:2 20:1	96:23	4 155:4,9,14,16	9
20:2 52:4 54:10	2013 71:6 96:20	400 1:15	9 31:16 73:24
55:12 56:3,8 57:1,6	2014 96:21,24 153:7	41 18:4,6	90 54:23 122:2,11
57:12 58:24 61:9,11	2015 29:13 79:20	42 18:4	122:17 136:19,22
65:11 141:5,8	155:25	48 31:2 119:25	91 148:6
143:24 144:10	2015-2016 132:17	121:9,13,20	
	139:2	49 3:3	

<p>93 3:4 9:27 1:5</p>	<p>acceleration 100:23 accept 41:24 150:13</p>	<p>103:10,19 107:24 120:18 129:2</p>	<p>121:23,24 123:5,13 123:25 127:7</p>
<p>a</p>	<p>accepting 42:2</p>	<p>address 153:24,25</p>	<p>144:10 147:3 148:5</p>
<p>a.m. 1:5 68:7,8 aaert 157:13 abilities 127:12 ability 65:4 70:18 98:14 able 6:21 20:19 52:16 53:8 55:2,2 57:19 59:8 74:17 75:14,20 76:21 77:11,13,23 78:2 79:16 80:4,5,7 82:15 85:2 92:22 94:11 99:20 105:14 108:22 129:6 134:2 135:18 142:18 abram 43:3,8 46:15 47:2,20,25 48:14 abrams 87:25 absolutely 61:14 78:12 150:5 academic 13:2 14:5 15:17,21 34:11,24 66:5 70:6,11,13 90:10 136:10,24 137:14,22,25 138:2 140:13 142:5 academically 8:1 66:2 academics 15:22 65:20 137:17 academy 8:12,14 12:21 69:25 70:13 72:16 76:2 79:9 89:22 96:2 115:16 132:14 134:19 153:21,25 accelerate 7:7 12:22 accelerated 65:7 96:6 100:17 101:2,3 120:11</p>	<p>access 90:15 92:9,24 92:24 149:15 accommodation 72:2 accommodations 71:13,20,24,25 72:1 72:9 74:15 75:11 accomplish 74:17 accountability 7:24 accounted 144:5 accumulate 20:19 21:10,23 accurate 38:23 73:10 115:14 133:8 achieve 136:19 137:2 achievement 146:18 achieving 137:22 acknowledged 35:10 aclu 1:17,20 acquaint 116:18 acquire 60:12 102:8 135:6 acquisition 46:25 60:12 acting 71:4 96:14,15 96:22 active 150:8 activities 7:8 10:10 11:10 14:4,14,23 17:3 65:19 88:15 104:24 127:24 154:11 activity 71:14 76:22 actual 8:15 30:22 57:9 126:17 addition 74:2 90:4 90:19 additional 60:13 77:14 78:23 79:22 102:2,8,17,19 103:4</p>	<p>adhere 45:7 administration 28:15 administrative 69:17 90:1 96:19 99:18 administrators 74:13 admission 21:24 admitted 21:14,20 51:5 adulthood 52:17,17 adults 52:12 66:19 advance 139:23 advanced 140:2 advancing 82:1 advantage 55:22 145:7 advantages 146:14 advent 6:24 advice 41:21,23,23 42:2 advocate 40:8 advocated 36:20,22 afraid 62:8 afs 7:16 afternoon 113:12 afterschool 126:14 age 8:18,19,21,22 12:13 13:20 16:23 19:25 20:5,10 21:23 34:20 54:12,21 55:13 57:9,12,20 61:7 141:5,13 aged 14:2 58:24 agency 54:24 ages 13:22 61:7,9 ago 9:3 14:17 17:19 81:21 agree 28:6 61:10 100:3 105:5 117:10 117:16,24 118:8</p>	<p>148:8 agreeing 28:12 agreement 19:13,21 ahead 44:9 aid 81:5 aided 151:17 aides 65:21 al 1:3 29:6 alembe 21:15,16 50:18,21 131:17 132:5 algebra 61:18 align 72:24 aligned 71:16 74:10 allergic 80:3 allied 149:12,19 allow 75:4 76:13 93:9 allowed 118:23 125:10 alternative 58:3 59:25 altiemy 22:11 23:6 amber 22:11 24:7 america 64:22 77:2 american 7:16,16 77:4 amount 71:21 84:6 89:2 102:14 108:6 108:11 117:18 118:13,20 119:1 120:16,20 122:10 123:7 angeles 95:21 angry 42:2 animals 77:4 announcements 111:2 answer 18:15,18 21:21 22:20 46:4 51:4 75:20 92:13 124:22 154:22</p>

<p>answered 22:17 86:5 106:11</p> <p>anti 135:13,17,19,23 136:7</p> <p>anxious 14:19 60:18</p> <p>anybody 43:12 48:8 48:14,15 95:9</p> <p>anyem 130:20 131:6 132:5,9</p> <p>anyemu 63:7,8 76:4 79:16,19 81:13 90:23</p> <p>anymore 87:16</p> <p>anyway 57:5</p> <p>apart 64:8</p> <p>apologized 42:5 43:15</p> <p>apparent 91:25</p> <p>apparently 91:19 94:4 130:21</p> <p>appearances 1:9 2:1</p> <p>appears 148:5</p> <p>applications 81:3</p> <p>applied 81:1</p> <p>appointment 22:3 80:7</p> <p>appreciate 23:19,22 41:4 126:24</p> <p>approach 17:22 44:12</p> <p>appropriate 90:21</p> <p>approve 19:18</p> <p>approved 143:25 144:4 157:9</p> <p>approximately 114:16 117:6,11</p> <p>aptitude 151:24</p> <p>arabic 133:18</p> <p>arch 1:11</p> <p>area 15:16 17:12 18:17,19 80:19 142:7</p> <p>areas 108:6</p> <p>arose 145:17</p>	<p>arrive 12:9</p> <p>arriving 55:13,16 109:11 110:3</p> <p>art 69:15 95:12,16 95:17</p> <p>arts 69:13,16 73:23 89:5 95:15 146:6 147:19 148:9</p> <p>asked 18:9 41:18 63:13 87:13 91:17 91:23 93:20,21</p> <p>asking 23:14 41:20 52:10</p> <p>asks 154:9</p> <p>aspire 149:12</p> <p>assesses 123:21</p> <p>assessment 25:9 91:19,25</p> <p>assessments 76:19 84:1 91:17</p> <p>assign 12:25 15:8 55:21 56:3</p> <p>assigned 12:6 147:7</p> <p>assignment 126:13</p> <p>assignments 75:19 83:25 125:4,14 126:16 136:23 137:16,23</p> <p>assistant 69:21 70:9 97:17</p> <p>assume 50:11 132:23</p> <p>assumed 53:23</p> <p>assuming 32:7,22 107:23 117:15</p> <p>assumption 152:1</p> <p>athletes 155:3</p> <p>athletic 9:15 14:10 14:13,21 152:20 153:4 154:3,23</p> <p>athletics 85:5 144:6</p> <p>atlantic 1:23 2:23</p> <p>atmosphere 78:9</p> <p>attain 78:11</p>	<p>attend 50:23 76:7 77:11,18,21 78:25 79:3,10,21 82:13,17 87:7,8 88:3,13 102:15 106:13,17 107:17 116:9 132:2</p> <p>attendance 13:17,23 76:18 83:25 136:20</p> <p>attended 77:13 82:14 85:15 88:10 125:24 131:19 135:21</p> <p>attending 18:25 75:25 80:19 85:20 86:9,20 87:5 88:15 101:23 102:3 103:12,19 106:12 106:13,20 131:16 137:23 143:12</p> <p>attends 76:5 105:19</p> <p>attention 37:7,9,10 40:9 43:8 82:10 87:5</p> <p>attitude 34:21 37:2 37:4</p> <p>attorney 4:8 49:9 60:22 67:16,19 68:15 91:13 92:2</p> <p>atwood 1:21</p> <p>audio 156:9</p> <p>auditorium 60:18 109:24</p> <p>august 1:4 17:19 97:2,5,18,25 157:16</p> <p>aura 3:4 68:17,22 69:2</p> <p>authority 10:5,12</p> <p>available 7:19 10:11 43:11 91:22 103:10 103:20 116:10 134:1 140:14 143:5 143:19,21 144:17 148:7 156:5</p> <p>average 111:11</p>	<p>avon 76:4</p> <p>aware 15:20 21:24 30:10 85:18 135:19</p> <p>awful 144:9</p> <hr/> <p style="text-align: center;">b</p> <hr/> <p>b 3:8 4:25 85:11</p> <p>baccalaureate 140:8 140:11,18 141:12</p> <p>bachelor's 69:13,15 95:12,14</p> <p>bachelors 5:10</p> <p>back 7:22 8:7 10:3,8 10:15 24:7 25:2 37:6 38:1,2 39:3 41:24 58:12 62:7,19 63:2,5 66:14 74:16 80:14 86:7 87:15,24 88:2 154:17 155:22</p> <p>background 5:9 65:11 69:12</p> <p>balahl 22:10 23:13 23:14,23 24:2,7 25:12 27:4,10,17,21 29:3,5 37:24 38:6 38:14 39:8 41:6,11 42:19</p> <p>balahl's 40:12 41:2</p> <p>balfant 59:21</p> <p>barrier 35:24 37:2 81:24 82:25</p> <p>barriers 59:9</p> <p>based 12:7 25:8 45:19 64:3 65:19 83:14 84:2,25 85:25 146:23 149:15</p> <p>basic 65:2 83:2 134:19 138:2 149:11</p> <p>basically 58:25</p> <p>basics 65:10</p> <p>basis 35:1 41:11 63:20 100:13</p> <p>basketball 14:18,20</p>
---	---	--	--

<p>becoming 25:21 began 97:17 beginning 31:5 109:14 145:24 begins 111:13 behalf 24:2 behavior 85:25 135:13,16,20,23 136:6 137:3 behavioral 87:10 believe 7:17 13:12 17:17 31:4 42:8 49:23 51:2 54:23 64:24 65:5 66:11 71:6 76:12 83:15 87:25 88:3 92:4,14 97:4,7 100:15,21 102:7,25 104:20 106:16 107:9 109:23 110:16 113:4 114:25 116:13,17 118:21 119:5 121:11 133:15 145:16 148:6 152:13 bell 110:21 111:19 benefit 72:7 141:8 benefits 126:25 best 11:15,22 12:17 13:2 15:17 90:7 147:11 better 21:2,3 45:13 45:15 46:1,11,14 56:25 65:1 67:12,13 72:6 136:19 149:20 151:6 big 6:16 7:17 70:4 83:24 binder 22:5 31:3,4,5 40:22 152:14 bio 144:24 biology 80:21 144:21,23 145:5,7 149:3</p>	<p>birthdate 36:20 bishop 52:3 bit 7:2 9:18 10:16,18 49:15 114:4 132:4 144:16 blackman 3:3 4:15 4:19,25 5:6 16:16 18:5,10 22:4 23:19 24:14 25:7 26:12 49:14 53:23 blackman's 145:13 blind 42:1 block 65:7 118:16 120:14 board 72:17 bodied 55:2 book 126:2 150:11 books 125:11 boss 51:25 bottom 18:6 22:25 38:4,12 134:14 139:5 144:22,23 151:13 154:2,18 box 1:18 branch 80:20 breach 157:12 break 10:18 33:4 breaks 33:5 brief 5:8 69:11 bring 40:8 brooklyn 56:2 brother 131:17,23 132:5 brothers 14:17 106:21 brought 43:7,13 78:7 87:4 126:2,2 132:1 brown 29:22 buffet 78:9 building 151:16 buildings 67:14 119:22 built 127:24</p>	<p>bullied 87:6 bullying 87:9,20 burma 88:9 bus 9:25 10:3 110:3 buses 10:5 business 151:10,17 businesses 142:12 busing 10:8,11 busses 113:9,11 bussing 110:12,19 112:22 113:8 114:7</p> <p style="text-align: center;">c</p> <p>c 4:1,25 146:3 cabrini 69:18 caf 114:20 calculate 84:6 calculated 59:4,6 84:4 calculations 85:10 calendar 104:9 115:17 call 4:3,12,15 28:16 38:24 55:25 67:24 68:10,15,17 73:5,17 86:19 114:25 130:8 135:17 called 4:5 68:13 80:4 86:25 109:13 126:25 127:2 140:7 148:19 camelot 70:16 72:17 95:25 96:3 97:1,8 97:12 109:23 camp 2:4 campus 10:1 70:8 139:2 144:1 capabilities 55:17 57:16 caps 41:9 card 83:21 care 106:16,20 career 72:22 142:7 142:13,21,25 143:2 143:11,13 149:21</p>	<p>151:15 careers 61:8 147:17 149:11,13 150:9 151:11,14,17 case 4:8 11:11 22:10 25:11 29:22 30:3,11 36:16 37:16 39:16 39:19 40:7 41:10,10 79:2 81:2 87:21 93:23 109:4 129:10 cases 107:9 108:12 catch 44:9 caught 62:18 causes 11:18 center 1:14 2:3 59:24 142:21 143:2 century 102:23 cert 157:14 certain 108:14 certainly 17:24 48:22 49:4,11 53:20 80:15 92:11 certificate 96:16,23 certification 5:13 96:21 99:9 certifications 157:1 certified 89:8 128:21 151:15 157:13 certify 157:3 cetera 57:11 challenge 64:17 challenges 64:23 chances 152:9 change 90:3 135:13 136:2,5 changed 110:20,21 112:2 117:4 135:24 changes 43:22 44:23 74:15 75:5 110:23 111:20,21 112:9,11 113:19 changing 136:6 chapter 1:20</p>
--	--	--	---

charge 6:15 70:17 chart 147:14 check 44:2 chesson 87:1 chester 14:17 child 12:13 13:4 57:25 childhood 151:18 children 10:13 52:10 61:6 62:3 64:18 66:17,17,19 67:5,7 105:8 chin 133:20 choice 78:19 79:3,21 132:3 142:8 choices 102:5 choose 76:7 82:13 105:16 107:10 126:8,10 choosing 77:18 78:20 chose 79:2 109:5 131:15 chosen 79:20 circulation 23:23 circumstances 33:2 35:16 40:2 58:8 citizens 52:15 city 10:6,13 claiming 130:9,14 clarify 110:17 clarifying 24:24 class 9:4 56:10 61:17 71:14 75:10 82:6,23 83:18,24,25 84:8 85:18 89:5,10 99:13 100:12 101:23 110:23 113:13,15 114:2,17 114:22,24 116:9,10 117:19 118:22 119:3,9,11,14 120:22,24 124:19 125:16 126:14,16 127:8,18 128:10,10	128:14,15 129:1,4 129:24,25 130:10 130:11,15,18 145:24 classes 56:6 73:23 75:15 76:21 81:14 81:22 89:12 101:24 102:16 111:3 113:25 114:9 115:4 118:24,24 121:9 122:6,12 124:9,13 124:14,16 128:17 139:24 144:23,24 classroom 61:13 72:3 73:2 75:20 76:25 87:11,17 99:21 123:16 125:3 127:17 128:23 129:11,19 142:6 classrooms 83:2 85:1 88:18 129:15 cleared 14:12 26:5 clearly 36:11 clerk 4:2,17 68:6,9 68:20 client 41:3 clients 92:10 clinical 149:17 clinton 59:24 clock 14:7 closer 19:9 coach 14:20 codes 115:2 cohort 6:14 57:24 coleman 2:3 collaborative 73:1 college 6:14 52:20 53:9 72:22 73:4 74:24 75:10 77:1,1 80:16,19 84:14 138:7 151:24 152:3 152:4 column 144:22 145:2	combination 12:6 34:10 combines 142:6 come 7:5 14:11,16 15:7,9,10 19:25 20:4 27:12 35:15 44:1 50:15 58:12 63:1,5 67:13 76:12 77:7,18 79:16 80:14 83:11 87:15 106:8 146:4 154:17 155:22 comes 12:13 56:2 73:19 102:23 comfortable 87:14 coming 8:23 27:22 59:23 67:12 74:22 82:2 88:2 110:4 113:9,11 115:21 137:15 comments 155:10 155:17,20 commission 9:15 committee 99:1 common 35:18 74:11 147:23 commonwealth 96:24 communicate 34:16 35:22 80:5 129:18 131:3 communicated 49:22 86:9 communicating 45:8 131:4 communication 73:23 87:25 89:5 communications 45:13,15 46:5 48:4 communities 6:18 6:24 8:16 67:2 145:11,17 146:3,3 146:13 150:21 community 6:9,12 6:15 8:4 52:13,20	53:9 55:10 59:13 66:4 80:19 143:18 146:5 147:23 company 1:23 2:23 competing 84:16 complaint 21:21 complete 30:17 32:19 45:20 46:4 50:25 51:1,2 75:18 100:21 108:15 126:8 136:22 137:9 completed 32:2,7 45:25 81:3 96:19 completely 92:8 completing 45:17 46:8,9 137:16 component 19:22 115:13 components 14:6 25:9 comprehensive 55:9 compulsory 13:17 13:23 54:12 computer 27:23 148:23 151:17 computers 74:5 conceivably 104:8 concepts 149:11 concern 58:14 92:13 concerning 28:23 106:9 concerns 15:11 concrete 110:10 conducted 87:10 conference 33:5 conferences 33:12 33:15 confirm 41:5 confront 42:12 confronted 64:16 confronting 59:9 confused 103:3 connected 137:20 conscious 45:2,5,6,8
---	---	--	---

consequences 67:4,6 consider 87:17 90:17 99:16,23 considered 57:21 90:7 considering 57:4 115:9 126:19 consistent 74:5 81:19 consumable 73:17 73:18 contact 86:12 contd 2:1 content 82:20 118:15 128:10 130:7 continue 56:16 80:14 151:8 contract 64:5,10 conversation 14:8 37:18,19 50:5,20 conversations 14:1 15:14,16 44:5 46:24 82:19 106:6 cooked 78:6 cooperative 142:3 coordinated 76:1 coordination 66:13 coordinator 6:1,3 coordinators 74:8 74:13 copied 22:12 23:8 27:19 37:9 copies 15:4 copy 38:18 core 71:16 74:11 124:14,16,17,18,22 128:10 146:8 corporate 2:3 correct 13:24 18:23 19:3,20 20:6,8,14 20:21 21:13 26:18 27:12,13,24 29:19 30:1,5 31:1,23 32:22 35:13 36:7	39:22 41:7 42:11,16 50:2,6,21,22 51:11 54:13,14 55:14,19 56:23 57:2,21 58:18 58:22,23 63:9,10,12 66:7 93:19 95:25 96:1,17,25 97:12,13 97:23,25 98:10,13 98:22 100:10,20 101:6,9,11,12,13,14 101:23 103:13,16 103:20,21,23 104:3 104:14,19 105:2,9 107:21,25 108:3 109:11 112:14 113:23 114:5,13,22 114:23 115:18,21 115:24,25 116:1,4,7 116:11,23 118:10 119:15,16,20 120:2 120:22,25 121:4,7 122:4,13,15,16,20 123:18,19,24 124:5 124:16,21 125:7 126:6 127:21 128:4 128:18,21 130:22 131:7,24 133:4,8 134:9 136:16,20 137:11,23 140:3,11 141:5,6,8,13 142:14 143:6,19,22 144:13 144:18,19,21,24 145:3,8,14,18 147:20,24 148:2,13 148:19 149:3,7 150:2,9 151:19 152:5,10 153:8,20 153:22 154:25 155:14,17 156:5 157:4 correctly 25:12 26:23 81:9 134:20 136:3,25 137:11 142:9 143:15 146:9 146:25 147:12	148:24 149:23 151:22 153:5 155:4 cosmetology 151:18 counsel 49:2 91:17 93:9,11 94:4 138:12 151:8 counseling 5:12 6:2 6:3 10:17,20 12:2 20:23 58:16 counselor 5:2 6:7,8 16:9 17:24 35:20 48:22 53:16 62:15 62:23 63:2 64:13 69:5 83:13 91:12 counselors 10:21 11:7 count 27:15 130:2 139:12 counting 144:14 countries 7:14,18 77:4 country 7:10 couple 14:16 33:18 151:2 course 70:25 74:18 75:8 115:2,10 127:23 141:17 courses 5:14 78:9 100:13 108:10,14 108:18 119:23 124:11 127:23 140:3 144:1,4,5,9 144:16 145:6 148:7 148:12 court 1:1,23 2:23 4:3,4,5,12,16,20 5:1 16:8,12 17:24 48:22 49:1,4,8,11 53:16 53:20 54:5,9,15 55:11,16,20 56:19 56:24 57:3 58:14,19 58:24 59:15,19 60:21 61:1 62:14 64:13 66:15 67:3,15 67:19,21 68:4,10,11	68:13,18,23 69:4 91:11 92:2,12,18 93:9 98:8 118:1 150:16 151:1,4,8 152:20,24 court's 60:23 courtroom 125:22 145:13 cousin 56:9 cover 71:21 75:7,12 covering 75:8 created 142:4 creating 146:2 credential 55:6 credit 8:24 12:5 56:4,15 66:8 100:22 117:21 121:3,6,22 122:3,20,23,23 123:1,8,10,22,23 124:3,4,18,21,22 credits 8:15,25 12:7 12:10,19,22 14:12 15:6,7,9 20:19 21:10,23 44:2,2 56:1,2,8,11 58:4,12 62:19 76:14 77:10 77:14,22 78:11 79:22 80:12 83:16 84:10,11 101:5,16 101:22 102:2,8,12 102:19 103:4,10,11 103:15,19,22 104:2 104:9,10 107:1,3,14 107:19,25 108:2,6,9 108:10,21,22 118:9 118:11 119:7 120:18 124:7 134:23 135:6 137:6 critical 59:13,13 crockpots 78:8 cross 3:2 16:9,14 91:13 93:11,13 118:1 ctc 142:19,20
--	--	---	---

<p>cultural 35:24 64:19 65:19</p> <p>culturally 7:9</p> <p>current 5:24 6:1,10 11:4</p> <p>currently 10:16,22 63:19 69:19,20 96:18 131:9 141:11 141:14,20</p> <p>curricular 10:9 14:4</p> <p>curriculum 14:3 70:22 71:16,19 73:8 73:9,12 74:2,6,7 98:21,24 99:1,4 139:3,17,21 146:8 150:12 155:25</p> <p>cut 98:14</p> <p>cutting 7:22</p> <p>cv 1:3</p>	<p>45:16 46:2,8 54:23 85:16,21 102:14 111:7 112:15 116:7 116:10,14,23 117:1 121:7 122:2,11</p> <p>dead 21:2</p> <p>deal 42:3 93:10</p> <p>debrief 86:7</p> <p>december 29:12 30:6 32:10 33:24</p> <p>decided 34:17</p> <p>decision 20:7 34:23 108:18</p> <p>decisions 11:22 13:10 41:10 54:21 62:12</p> <p>decreases 146:18</p> <p>dedicated 119:24</p> <p>defendant 2:2</p> <p>defendant's 4:8</p> <p>definitely 42:23 93:2</p> <p>degree 95:12</p> <p>degrees 95:14</p> <p>delay 40:2 50:7 53:24</p> <p>delayed 39:25 40:1</p> <p>delays 110:11</p> <p>delivered 130:7</p> <p>delivering 130:5</p> <p>delivery 18:11</p> <p>demonstrated 59:8</p> <p>demonstration 37:2</p> <p>denied 21:19,22 35:1 40:14</p> <p>dennehey 2:2</p> <p>deny 21:11</p> <p>department 142:4</p> <p>departments 74:9</p> <p>depend 102:14 127:22 128:22 129:4</p> <p>depended 131:25</p> <p>depending 15:8 66:25 111:4 112:16</p>	<p>113:10 124:10 127:18</p> <p>depends 102:25 111:5 125:16 128:24</p> <p>deposed 98:11</p> <p>deposition 17:19,25 19:4 39:3 41:18</p> <p>describe 11:12</p> <p>described 16:22 28:2 31:25 48:8,17 143:4</p> <p>describes 28:13</p> <p>describing 26:23</p> <p>description 5:8 24:10 69:11</p> <p>desegregated 93:5</p> <p>design 151:18</p> <p>designed 60:15 66:10 74:7 142:8 148:21</p> <p>desire 86:10,20 104:11</p> <p>detail 28:1</p> <p>determine 12:16 26:6</p> <p>develop 34:11,24 136:1 146:19</p> <p>developed 7:3,4,6 46:6</p> <p>developing 99:6</p> <p>development 11:3 11:10 74:3 98:21 104:21 109:23</p> <p>devise 44:10</p> <p>devoted 122:25 146:5</p> <p>difference 8:13 18:11 122:22</p> <p>differences 15:21 70:2</p> <p>different 7:9,14 8:11 11:6,17 29:5 30:15 47:12 48:15 64:8,20 72:10,25</p>	<p>73:24 100:7,9,11 109:18 111:3 112:21 114:6 115:2 117:19 126:23 127:4,8,16 142:23 143:1 145:5 147:20</p> <p>differentiated 127:1</p> <p>differentiating 45:23 127:17</p> <p>differentiation 127:5,14</p> <p>differently 84:11</p> <p>difficult 35:15 37:2 37:4</p> <p>difficulties 53:7</p> <p>difficulty 88:20</p> <p>diploma 13:12,13 14:6 21:1,5 52:18 52:23,25 53:9 55:9 141:16</p> <p>diplomas 52:20,21</p> <p>direct 3:2 5:4 48:9 69:7 126:22</p> <p>directed 42:10 48:10,15</p> <p>directly 49:24,25</p> <p>director 7:5 10:16 10:19 14:13,21 20:23 70:7</p> <p>disaggregated 94:5</p> <p>disagree 25:25 51:24 65:15</p> <p>disagreed 28:10</p> <p>disburses 10:5</p> <p>disclosure 152:21 153:4</p> <p>disclude 115:14</p> <p>discouraged 56:12</p> <p>discuss 14:2 22:1 43:8 50:24 86:22</p> <p>discussed 23:4 42:18 43:5 46:20,23</p> <p>discussion 35:4 145:11 148:11</p>
d			
<p>d 3:1 4:1 157:14</p> <p>dancing 7:17</p> <p>data 11:19 65:25 66:14 90:21 91:2 93:23 94:4 95:2</p> <p>date 30:8,13 31:16 31:25 32:2,2 39:8 39:18 43:20 45:25 45:25 116:1 132:20</p> <p>dated 157:16</p> <p>dates 30:14 31:17 32:22 45:23</p> <p>day 10:1 22:5 40:22 45:6 78:7 88:25 98:15 102:5 103:16 106:5 107:10 109:7 109:14 111:1,6,18 112:10,12,23,25 113:3 115:23 116:2 116:6 119:19 123:18 125:5 152:14</p> <p>days 6:16 32:21 33:17,19,22,22</p>			

<p>discussions 106:2 disparity 61:11 63:17 dispense 150:24 dispute 139:11 district 1:1,1,5,8 5:19,21,23,25 6:5 6:16 10:21 12:9 15:9 19:1,25 20:4,5 20:16 21:12,19,20 24:12 25:14,21 28:14 31:17 32:16 32:17 33:13,21 38:7 43:22 44:13 45:14 52:9,11 53:1 59:2 64:7 66:6 69:21 70:1,22 71:17 73:21 85:11 90:2,8,21 92:17 97:22 98:23 106:25 108:17 113:8 115:17 116:4 140:6 145:25 153:18 district's 28:3,18,20 28:25 diversified 141:22 142:2,16,22 143:9 143:10 doctor 16:18 doctor's 80:6 doctoral 59:21 doctorate 5:15 document 93:7 documents 92:6,8 doing 47:13 53:6,9 62:5 73:4 76:19 84:9 87:18 90:8 120:19 121:16 127:24 137:23,24 dominican 7:12 door 54:19 79:17,17 81:11 86:5 106:11 doors 21:5 52:18 109:8 110:8</p>	<p>doubt 31:24 38:22 dozen 145:2 dr 2:3 16:16 43:3,8 46:15 47:2,20,25 48:14,14 51:15,25 52:3 87:25 drafting 151:17 drive 74:4 dropout 6:2,3 10:17 11:13,14 12:2 20:24 59:22,24 dropouts 9:5 58:17 drops 80:2 dually 89:8 due 105:16 dunia 21:15 63:7,8 76:4 90:23 130:20 dunia's 50:18 duties 70:11,14</p> <hr/> <p style="text-align: center;">e</p> <hr/> <p>e 3:1,8 4:1,1 22:9,17 22:20,24 23:1,4,16 23:20,23 24:8,15,16 24:19,22 25:1 27:2 27:3,7,9,10,18,21 28:7 29:3 37:8,13 37:17,20,24 38:5,21 39:7 40:12,13,24 41:2,4,6,8,11,25 42:9,12,18 43:5,7 43:11 46:19 69:2,3 77:1 84:5,22,25 85:6 92:24 95:9 eager 40:25 earlier 101:25 113:10 early 65:25 66:14 145:18 149:15 151:18 earn 58:12 77:13,23 79:22 102:2,12,19 103:4,10,15,18,22 104:2,9 107:7 137:6</p>	<p>earned 12:8 101:22 earning 107:6 108:20 119:7 easier 23:13 easiest 155:7 easily 121:19 eastern 1:1 easton 1:5 eating 78:4 ecro 2:5 education 1:14 5:10 7:5 16:1,21 20:12 20:14 39:24 52:22 54:12 55:22 56:17 56:22 57:7,16,17 58:10 60:4,6 69:15 69:17 72:5 76:22 79:6 85:14 95:13,16 120:8 131:14 142:3 142:4 143:14 149:21 151:19 educational 5:9 56:19 57:10 58:15 58:20 59:1,3,7,16 69:12 89:16 142:13 142:25 educator 52:14 edward 1:7 effective 59:23 effectively 59:6 effort 65:6 83:5 efforts 44:17 egs 1:3 eight 13:18 70:9 103:11 110:19 117:7 122:17 eighth 12:10 56:9 either 12:1 51:19 57:1 86:10 88:21 89:12 117:23 118:13 120:18 137:14 elective 108:10 114:17 124:10</p>	<p>electives 107:8 146:8,15 electronic 157:5,13 electronics 151:19 eleventh 15:8 57:19 141:16 eligibility 131:13 144:6 eligible 85:7 108:8 ell 60:7 66:13 72:4 90:4 ells 127:14 elyse 87:1 embarrassed 56:13 61:22,23 employed 5:16,18 5:20 59:2 69:19,20 92:25 employee 97:21 employment 60:3 86:24 149:21 150:1 enables 104:22 encountered 29:24 ended 97:6 156:9 ends 65:8 116:1 engaged 135:17 engaging 34:21 engineering 148:23 english 15:11,21 17:7 18:11 34:14 55:17 57:11 58:25 59:11 64:19 65:3,5 65:7,8,10,11 76:15 76:24 77:12 78:12 78:17 82:1 83:2 89:8,18 108:11 enjoyed 7:11 enroll 21:18 33:25 34:3 44:17 enrolled 25:5,13,21 25:23 26:4,19 28:8 30:9,24 31:19,24 32:17 33:11 34:4 36:14 41:4 50:20 88:6,6,7 90:3 96:18</p>
--	---	--	--

<p>131:22,23 enrolling 33:14 47:9 132:8 enrollment 15:4 21:11,22 23:15 25:6 25:8,24 26:4 27:22 28:9,11,23 30:10,11 30:14,14,16,22 31:12,17 32:19 33:9 35:2 39:17 40:14 43:23,25 44:24 45:17,19,24 46:9 48:6 50:18,25 51:2 51:5,6,7 ensures 46:6 entered 155:19 entering 128:25 enthusiastically 61:19 entire 71:15 75:9 101:23,24 141:17 150:11 entitled 54:11 56:21 157:6 entry 31:16 136:6 142:1 environment 56:17 67:10 78:14 146:2 envision 70:2 equates 85:11 123:4 equivalency 21:1 equivalent 109:21 eric 1:10 esl 81:23 82:15 85:18,19 88:24 89:2 89:6,8,12,16 90:17 99:9,11,13,15,17,23 100:1 106:10,10 128:21 130:11,15 130:18 especially 60:6 80:1 90:2 144:6 150:3 esq 1:10,10,13,14,17 1:19 2:2</p>	<p>essentially 50:3 70:17 76:13 established 52:3 estimate 111:11 112:19 estimated 19:4 et 1:3 57:11 evaluate 54:20 94:19 95:8 evaluating 90:18 evening 80:7 event 28:2 events 7:17 eventually 22:11 24:11 36:14 37:11 42:18 everybody 43:11 everyday 98:8 evil 42:6 exact 19:6 30:8,13 89:13 117:14 exactly 44:21 92:5 120:1 exam 96:20 examination 5:4 16:14 49:12 53:21 61:4 62:16 69:7 93:13 118:1 148:7 examine 91:13 93:11 examining 16:10 67:25 example 30:24 72:3 73:19 79:16 120:21 examples 90:13 excel 96:2 excess 116:25 exchange 23:5 25:1 27:3 excuse 66:18 executive 70:7 exercise 123:20 exhibit 22:4 31:2 38:1 40:11,21 132:12 134:13</p>	<p>138:11,13,24 141:22 152:13,16 154:18 155:7,22 exhibits 139:1 exist 9:20,20 existing 143:12 exists 8:8,9 exit 13:19 90:16 expect 71:8 127:19 expectation 72:12 expectations 71:9 74:20 experience 8:6 93:7 experiences 13:13 79:25 81:16,18 149:16,22 expert 64:25 65:5,12 99:15,17,23 100:1 expertise 15:17 17:12 18:17,19 experts 59:4 explain 56:21 57:14 155:4,13 explained 145:12 expressed 40:13 80:15 81:22 extended 102:5 111:4 125:4 extension 72:8 extra 10:9 14:3 57:4 108:22 extracurricular 9:19 eye 80:2</p> <p style="text-align: center;">f</p> <p>face 44:3,4 facilitating 126:22 facilitator 6:9,12 fact 9:3 33:10 36:22 75:24 106:20 109:3 factor 35:3 failed 50:23 51:3 failure 35:21 52:25 53:1,1,2,2,13,14</p>	<p>fair 40:21 falcone 63:16 fall 12:1 71:5,7 80:14 familiar 29:8 47:20 48:1 75:22,24 77:3 104:25 109:22 140:8 familiarity 35:11 familiarized 24:16 families 44:8 52:16 54:23 55:3 146:20 family 19:12,14,21 29:17,24 30:3 34:4 36:1 49:15 58:8 77:20 78:8 86:13 106:15 far 36:18 50:18 65:1 110:9 fast 120:11,13 faster 45:3 117:22 117:23 118:9,11,14 120:19 february 44:18,19 46:17 79:20 feed 55:1 feel 53:2,3 55:8 78:1 78:13 79:24 81:20 81:25 92:25 100:5 137:15 feeling 79:4 80:1 feelings 85:19 146:18 felt 80:21 82:15 87:14 field 77:2 fields 149:12,13 file 31:7 filed 39:2 93:25 financial 81:5 find 38:13 55:2 58:3 64:21 75:13 85:23 87:11 finding 86:24 93:4</p>
---	--	--	--

<p>fine 69:13 80:5 95:15</p> <p>finish 97:6 134:7</p> <p>finished 75:25 87:20</p> <p>finishing 110:3</p> <p>firebird 137:2</p> <p>first 5:22 6:17 14:24 22:24 23:4,21 27:14 29:3 38:5,9 45:23 54:11 57:17 61:18 71:12 80:3 84:6 89:3 93:22 97:5 98:17 106:8,23 111:12,18 112:4,13 134:22,25 141:25 144:22 145:22 148:4 154:17 155:12</p> <p>firsthand 75:21</p> <p>fitness 114:25 115:3 115:9</p> <p>fits 147:11</p> <p>five 32:21,24 44:8 45:6,16 46:1,8 57:6 83:15 87:13 94:9 97:15 101:7 119:3 119:11,13,17 125:23 129:9 134:13 135:20 136:16 144:23,24</p> <p>flexible 113:5</p> <p>flounder 52:5</p> <p>focus 14:23 23:21 26:13,13 54:10 57:16 80:21</p> <p>focused 8:2,2 94:1 95:15 146:6</p> <p>folder 132:12</p> <p>folks 86:17</p> <p>follow 59:18 123:2 123:11 139:18</p> <p>followed 44:16</p> <p>following 27:5 71:19 86:16 90:6 96:16 111:15</p>	<p>food 7:17 77:25 78:6</p> <p>forced 54:25</p> <p>foregoing 157:4</p> <p>foreign 7:16</p> <p>forgive 21:3</p> <p>form 31:13,22 44:1 153:5,10,11</p> <p>formal 70:19 74:24 76:25</p> <p>formalities 85:12</p> <p>formally 79:14 95:6</p> <p>formed 6:19</p> <p>former 53:5</p> <p>forth 10:8 24:7 25:2 67:4</p> <p>forward 21:6 45:22 49:18 78:22 80:23 86:23 140:22</p> <p>found 9:5 85:24 87:21 106:9</p> <p>foundation 6:17,20 6:22 66:1 94:16 145:18 150:7</p> <p>four 33:22 44:8 57:5 57:24 60:13 95:19 95:19 97:15 102:18 102:19 103:4 107:4 107:8,13 112:1 134:12</p> <p>fourth 25:4</p> <p>frame 46:1</p> <p>framework 73:6</p> <p>france 7:14</p> <p>free 20:11,13 54:11 56:22 57:7 131:14</p> <p>frequently 90:2</p> <p>freshman 60:17 63:18</p> <p>friday 4:7 7:9,12 9:14 51:15 60:11 85:4</p> <p>front 38:11 83:22 111:22 126:18</p> <p>fulfilled 92:8</p>	<p>full 4:22 18:18 52:17 68:25 103:14 119:24 121:3,7</p> <p>fully 44:13,14 104:13 145:12</p> <p>fun 62:5</p> <p>fund 6:20</p> <p>fundamentals 65:3</p> <p>funded 76:11 104:16</p> <p>funding 102:22,24 103:1,6,9,14</p> <p>further 48:24 54:6,7 61:4 62:16 64:12</p> <p>future 13:14 72:16 140:25 148:22</p> <p>futures 55:5</p> <p>fuzzy 65:18</p> <hr/> <p style="text-align: center;">g</p> <hr/> <p>g 1:7 4:1 157:3</p> <p>gain 65:2 149:14</p> <p>gainful 150:1</p> <p>gap 30:20 33:6,7</p> <p>gates 6:17,20,22 7:21 66:1 145:17</p> <p>gateway 13:14 60:3</p> <p>geared 72:4</p> <p>general 52:14 149:18</p> <p>generally 23:1 75:14 89:3 112:23 113:16</p> <p>geometry 120:22,24 121:6,22 122:3 123:1,9,10 124:8</p> <p>getting 13:13 14:24 22:17 25:20 45:2,16 47:21 48:16 50:9 53:7,7 57:23 83:10 84:13 143:18 152:10</p> <p>girl 62:6</p> <p>give 5:8 14:15 36:17 41:23 46:1 54:19 69:11 74:21 75:2</p>	<p>90:13 108:2 121:18 127:4</p> <p>given 4:24 74:20 120:14 123:7 133:3 133:5 136:23</p> <p>gives 101:4,15</p> <p>giving 65:8 75:17,18 120:17,18 126:21 133:7</p> <p>gladly 150:13</p> <p>go 6:18 10:15 12:21 12:23,24 13:5,7 14:10,21 19:1,1,18 30:15 32:12 36:18 36:23,23 38:1 39:3 45:24 52:19,20 53:8 54:22 55:2 66:22 78:24 85:23 94:25 107:13 113:15 121:3 125:14 134:12 145:10 151:24 152:4</p> <p>goal 49:25 83:10 86:14 134:25 135:4 135:5,10,12 138:1,4</p> <p>goals 49:18 134:15 134:19 136:9,16,16 137:13</p> <p>god 4:24</p> <p>goes 10:1,3 25:2</p> <p>goggin 2:3</p> <p>going 8:6 9:4 14:19 16:19 17:25 21:1 32:12,23 33:1 37:1 37:3,6 38:24 55:5 57:14 60:17 61:12 68:1 70:4,4,8 72:7 74:13 75:1 80:6 81:5,8 84:13 86:8 87:14 100:15 103:15,22 104:4 107:4 110:10 111:1 111:4 112:16 120:2 136:18 137:16,25 140:21 141:16,25</p>
--	--	--	--

<p>143:1 144:16 145:22 146:11 150:16 152:9 good 4:4,9,10,12,16 5:6,7,16 16:16,17 35:21 52:4 58:10,11 60:7 62:11 63:4 65:22 68:18,19 69:9 69:10 72:1,9,19,20 73:5 76:18 93:15,16 98:18 127:9 144:15 149:2 151:23 152:3 152:6,10 gotcha 25:3 gotten 40:7 gpa 84:12 grade 7:1,1 12:7,10 12:20 15:6,7,8 31:16 56:1,7,10,14 57:13,15,18,18,20 58:10 60:20 73:24 140:16 141:17 145:24 gradebook 84:25 graders 9:8,10 grades 84:2,11,12 85:1,8 grading 84:3 graduate 9:8 11:16 11:23 20:20 57:24 60:9 63:14 80:22 94:9 107:1 108:16 108:23 109:1 131:15,16 137:10 138:10 150:2 graduated 12:14 16:4 57:1 63:11 80:10 90:24 91:4 92:19,21 94:21 95:22 109:4 131:6 131:12,24 132:5 graduates 9:6 graduating 9:4 graduation 7:25 9:7 11:2,18,21 12:12,18</p>	<p>14:24 15:19 34:11 46:25 52:4,7,11 56:5,18 58:3 63:4 64:4 77:10,14 78:11 79:22 81:4 83:8,12 83:16 90:20 91:20 91:22 92:16 93:18 108:5,8,12,19 115:11 134:23 135:7 grant 6:16 76:12 102:11,23,24 104:17,21 145:18 great 7:8 53:4 68:3 77:5 147:2 150:11 150:17,21 green 136:24 greeted 81:14 greeting 83:23 group 56:5 73:1 127:20 128:2,4 grouped 127:10 grouping 129:5 146:17 groups 73:2 114:18 126:20 127:16 128:1 143:11 grow 52:17 grown 77:17,17 guess 40:15 46:25 59:15 60:8 71:7 97:4 151:1 guessing 111:24 guidance 81:6 83:13 guide 52:6 74:6,7 139:3,17,21 156:1 guides 71:19 74:2 gun 66:7 guy 41:8 gym 114:24 115:8</p>	<p>hair 62:7 hakha 133:20 half 83:16 101:7 107:10 halfway 143:25 147:6 156:1 hall 112:24 113:2,21 hallway 118:23 119:2 hamilton 1:11 hand 4:18 17:25 18:6 68:21 handbook 132:15 132:25 133:13 138:20 handful 140:14 handle 15:14 hands 15:2 happen 16:19 21:14 26:24 33:6 58:11 108:13 110:22 113:12 happened 32:5 40:4 44:17,19 87:2,19 happening 71:14 87:12 111:5,21 112:12 114:7 140:22 happens 54:21 58:5 108:7 happy 80:12 hard 11:1,21 62:11 67:9 132:4 harrisburg 80:19 hasan 31:8 hassan 29:9 31:8 47:18 49:15 50:14 85:13 head 95:5 heads 74:22 health 115:13 147:17 149:6,12,13 149:19,21 150:4 hear 51:17,20 65:14 83:17 126:4</p>	<p>heard 9:13 60:11 70:25 88:12 101:17 125:23 126:1 129:9 hearing 1:7 heels 44:17 heisey 3:4 63:16 68:17,19,22 69:2,9 91:18 92:15 93:6,15 help 52:6 82:5,6 129:10 130:1 136:2 149:25 helping 78:11,12 86:13 106:15 heterogeneous 143:10 high 6:8,17,23 8:22 9:16 12:11 13:12,13 14:6 21:1 33:16 52:18 56:24 57:1,5 60:14 61:8 63:18 69:22 84:21 89:23 111:5 139:2 140:15 140:16 141:3,13 142:5 144:1 150:2 higher 9:1 highlight 94:12 highly 65:23 89:5,7 hill 2:4 126:24 hilt 15:16 22:11 23:6,18 24:7,10,19 25:4,11 26:11,23 27:3,4,13,20 28:2 28:13 29:20 35:6 38:15,17 40:9 41:15 41:19 42:10 43:1 49:19 66:12 87:12 92:23 93:4 hilt's 37:8,10 hire 10:21 hired 55:7 histories 64:19 history 14:16 hold 69:24 99:25 113:10</p>
	<p>h</p>		
	<p>h 3:8 69:2 hacc 81:1</p>		

<p>holiday 116:3 holidays 116:4 home 6:5 14:25 77:3 77:19,20 78:4,6 85:23,23 86:3,5,6 86:11 88:16 106:7 106:10,15 125:11 125:14 126:2,3 homeroom 109:21 109:25 111:4 homework 124:24 125:2,6 126:16 honestly 110:2 honor 4:11,14 16:11 17:23 48:21 49:7 53:19 54:4,8 65:16 67:20 68:16 91:15 93:3,12 150:10,14 151:3 152:15 honorable 1:7 honors 148:10 hooper 1:17 hoped 98:4 hopefully 101:20 hoping 77:24 150:19 hospital 149:18 hour 36:2 hours 117:3,11 123:4,9 124:3,19 house 109:13 110:1 110:9,14,24 111:9 113:16,22 houses 109:19 housing 54:25 hub 10:4 huge 65:18 huh 121:2 humanities 147:19 148:9 hundred 144:13</p>	<p>idea 7:6 58:15 108:20 150:17 ideal 110:18 111:14 111:16 identical 100:4,5,6 identify 87:13 image 66:3 immigrant 18:20 19:24 35:7 47:9,22 90:23 immigrants 44:24 immunization 38:7 53:24 immunizations 30:19,25 immunized 50:9 implement 46:10 59:4,6 implementation 57:25 141:2 implemented 70:23 89:21,23 145:25 important 13:11 14:8 16:21 52:8,9 61:2 84:16 135:10 importantly 59:7 improve 7:25 46:5 58:2 137:17,25 152:9 improvement 48:8 improving 47:6 48:4 impulsiveness 62:4 inadvertent 23:22 inadvertently 41:13 inception 66:11 include 15:15 151:16 included 23:4,5 139:20 154:15 includes 114:12 including 39:2 82:5 95:19 134:10 incorrect 27:5 36:21 increases 146:17</p>	<p>index 152:22 indicated 49:24 indicates 154:14 indicating 59:9 indiscernible 59:22 83:23 84:3,15 85:21 94:15 individual 11:21 146:22 individually 47:19 94:8 infer 132:21 info 38:6 informal 70:19 information 14:15 49:17,21 55:24 84:22 93:5 94:13,18 94:23,25 101:18 106:18 107:11 120:14,19,20 129:8 145:19 153:14 initially 14:12 initiated 21:21 22:10 87:9 initiative 48:11,12 48:17 injunction 1:7 input 54:19,20 99:3 instance 107:18 115:20 139:23 145:7 149:3 instances 88:12 institute 148:18 institution 135:4 instruct 120:17 130:2 instructing 81:24 instruction 65:9,9 65:24 76:16 88:24 105:5 119:19 122:3 123:21 124:20 126:17,21,23 127:1 130:5 142:6 instructional 70:16 72:13,14,15,16</p>	<p>75:17 115:7,10 117:12,18 118:13 121:21 122:11,19 122:22,25 123:7,14 123:15,17 124:4 125:3 int 142:8 intelligent 150:8 intention 109:24 intentions 152:7 inter 9:15,23 interacting 85:17 interaction 36:6 63:6 interactions 36:5 interest 58:5 145:6 147:12 149:2 151:24 interested 34:18 50:4 80:17 144:21 148:21 150:3 152:3 interests 146:16 147:24 interject 9:14 internally 11:20 international 6:25 7:3,6,20 8:5,10,19 8:21 65:2,13,17 66:24 69:16 78:18 140:7,10,18 141:12 147:18 156:2,8 international's 64:25 interplay 58:20 interpreted 30:15 interpreter 131:1,2 interscholastic 152:20 153:4 154:3 154:23 intervention 73:19 interviews 87:11 intimate 146:17 intimidated 82:22 intimidation 35:23</p>
i			
<p>ib 140:9,10,20 141:2 141:16,17 148:9</p>			

<p>introduced 92:1 investigate 40:3 47:8 53:25 investigation 87:9 87:16,20 88:1 invitation 77:19 invited 77:21 88:3 140:20 involve 11:13 involved 14:22 37:11 45:9 62:25 63:1 98:20 involves 19:13 involving 41:14,14 iso 146:18 issa 1:3 22:15 23:9 47:16 issa44 38:12 issue 26:19 40:9 50:11,13 53:25 93:10 125:21 issues 50:9 iup 90:5 i'm 107:11 122:15 144:15</p>	<p>keep 42:6 54:25 56:20 64:7 75:14 84:24 kept 95:4 key 35:3 khadidja 1:3 22:15 23:9 24:2,5,8,11 26:13 37:6,17,20,23 43:17 44:17 47:15 81:10,12,21 82:17 83:18 105:24 106:2 106:11,19 khadidja's 25:11 39:3 40:13 50:7 53:24 76:5 105:18 kids 13:21,21 14:22 16:20 33:14 53:3 60:9 65:22,23 77:6 79:18 104:25 105:4 130:11,11 152:2 kind 12:6 62:6 67:3 78:14 79:24 113:5 147:23 kindly 91:21 knew 130:21 know 13:15 15:25 17:15 18:10 20:25 22:16,16 30:13 31:21 32:3,23 33:2 33:8 34:16 35:17 36:2 37:4 40:2 42:22 43:19 50:8,19 56:24,25 57:11 59:11,16 61:20 62:1 62:9,22 63:3 66:24 72:5,9 75:5 76:13 76:18,23 77:3,11 79:4,12 80:12,25 81:12 82:8,18 83:21 84:16 85:2,7,10,13 85:17 86:8 88:1,14 92:10 94:12 98:2 101:20 104:21 106:11 108:17 109:3 113:11 114:7</p>	<p>114:18 116:15 117:3,8,13,13 118:4 120:1 125:20 129:16,22 131:17 131:20 138:9 139:8 139:10 140:21 143:3 144:14 145:19 150:16 152:18 153:10 knowing 117:9 122:14 129:8 knowledge 88:23 89:22,24 90:24 134:4,6 known 14:18 20:22 79:19 85:25 141:16 knows 93:6,8 kristina 1:13 kulick 2:5</p>	<p>large 109:24 139:15 139:16 larger 67:10 lastly 51:14 late 33:6 laughter 150:18 law 1:14 20:21 59:1 116:13,15,17,19,22 laws 58:1 lawsuit 13:22 21:21 28:24 39:2 50:15 66:16 75:23 79:14 93:25 lea 153:12,14,17 lead 70:6,10,13 74:8 87:10 90:11 leader 70:16 99:19 leadership 69:18 99:18 147:18 learn 65:4 72:25 77:12 86:2 98:5 101:18 learned 35:14 106:14,18,19 145:20,21 learner 72:4 learners 52:14 72:11 90:4 149:16 learning 6:9,11,15 6:18,24 7:7 8:16 18:12 57:16 59:11 70:18 72:25 81:25 82:1,7 99:18 107:11 118:17 127:12 145:11,17 146:1,2,3 146:5,13,15,22 150:21 leave 13:19 52:24 56:13 58:7 85:22 leaves 9:25 54:24 leaving 52:10 112:22 lecture 126:22 left 50:3 57:25 71:5 86:12,16</p>
<p style="text-align: center;">j</p>	<p>kind 12:6 62:6 67:3 78:14 79:24 113:5 147:23 kindly 91:21 knew 130:21 know 13:15 15:25 17:15 18:10 20:25 22:16,16 30:13 31:21 32:3,23 33:2 33:8 34:16 35:17 36:2 37:4 40:2 42:22 43:19 50:8,19 56:24,25 57:11 59:11,16 61:20 62:1 62:9,22 63:3 66:24 72:5,9 75:5 76:13 76:18,23 77:3,11 79:4,12 80:12,25 81:12 82:8,18 83:21 84:16 85:2,7,10,13 85:17 86:8 88:1,14 92:10 94:12 98:2 101:20 104:21 106:11 108:17 109:3 113:11 114:7</p>	<p style="text-align: center;">I</p> <p>I 1:14 4:25 157:12 label 38:12 laboratory 149:17 lack 8:25 21:2 ladies 58:7 lancaster 1:5 5:19 5:21,23 18:25 21:12 24:12 25:13,22 28:14 38:8 42:7,8 43:23 52:11 64:7 69:21 70:1 80:20 97:22 98:23 106:25 115:17 140:6 145:25 149:18 153:15,17 language 14:25 15:11,22 17:7 18:11 34:14 46:25 59:9 60:12 65:3,9 77:20 89:8,18 99:7 127:10 127:11 133:14 136:12 languages 134:9</p>	<p>learn 65:4 72:25 77:12 86:2 98:5 101:18 learned 35:14 106:14,18,19 145:20,21 learner 72:4 learners 52:14 72:11 90:4 149:16 learning 6:9,11,15 6:18,24 7:7 8:16 18:12 57:16 59:11 70:18 72:25 81:25 82:1,7 99:18 107:11 118:17 127:12 145:11,17 146:1,2,3 146:5,13,15,22 150:21 leave 13:19 52:24 56:13 58:7 85:22 leaves 9:25 54:24 leaving 52:10 112:22 lecture 126:22 left 50:3 57:25 71:5 86:12,16</p>
<p style="text-align: center;">k</p>	<p>kind 12:6 62:6 67:3 78:14 79:24 113:5 147:23 kindly 91:21 knew 130:21 know 13:15 15:25 17:15 18:10 20:25 22:16,16 30:13 31:21 32:3,23 33:2 33:8 34:16 35:17 36:2 37:4 40:2 42:22 43:19 50:8,19 56:24,25 57:11 59:11,16 61:20 62:1 62:9,22 63:3 66:24 72:5,9 75:5 76:13 76:18,23 77:3,11 79:4,12 80:12,25 81:12 82:8,18 83:21 84:16 85:2,7,10,13 85:17 86:8 88:1,14 92:10 94:12 98:2 101:20 104:21 106:11 108:17 109:3 113:11 114:7</p>	<p>language 14:25 15:11,22 17:7 18:11 34:14 46:25 59:9 60:12 65:3,9 77:20 89:8,18 99:7 127:10 127:11 133:14 136:12 languages 134:9</p>	<p>learn 65:4 72:25 77:12 86:2 98:5 101:18 learned 35:14 106:14,18,19 145:20,21 learner 72:4 learners 52:14 72:11 90:4 149:16 learning 6:9,11,15 6:18,24 7:7 8:16 18:12 57:16 59:11 70:18 72:25 81:25 82:1,7 99:18 107:11 118:17 127:12 145:11,17 146:1,2,3 146:5,13,15,22 150:21 leave 13:19 52:24 56:13 58:7 85:22 leaves 9:25 54:24 leaving 52:10 112:22 lecture 126:22 left 50:3 57:25 71:5 86:12,16</p>
<p>k 4:25 99:20 kathleen 1:10</p>	<p>k 4:25 99:20 kathleen 1:10</p>	<p>k 4:25 99:20 kathleen 1:10</p>	<p>k 4:25 99:20 kathleen 1:10</p>

legal 14:13 legally 13:9 lengths 117:19 lesson 70:24 71:11 71:13,23 letter 77:20 letters 134:3 level 9:17 82:3 127:10 128:25 137:10,22 138:2,9 levels 12:7 61:25 127:4,8,11 140:16 liar 38:25 life 54:21 58:5 114:25 115:3 136:1 lifelong 52:14 light 60:23 67:17 likeminded 147:23 limited 55:17 104:19 119:1 line 24:19 57:23 61:6 74:4 90:7 150:25 listed 25:9 134:10 134:22 135:1,12 138:2 144:10,17,23 lists 147:15 literacy 73:2 litigation 24:17 39:17 71:1 little 7:2 9:18 10:15 10:18 49:14 59:17 103:3 114:4 live 10:13 llp 1:11 local 142:12 143:13 locations 114:6 logan 1:12 long 5:20 32:18 57:5 59:16 74:25 75:14 81:12,20 110:24 114:15 124:9 longer 8:8,9 86:24 92:24 100:12 111:7 118:24 119:21	122:6 look 8:10 9:3 11:14 11:17 18:5 22:4,22 31:10 59:1 78:22 93:2,24 136:15 140:22 144:21 153:12 looked 11:16,19 64:9 92:16 94:5 95:4,7 looking 8:4 22:20 38:4 65:17 77:7,8,9 77:11 81:5 90:15,19 93:18,22 155:25 looks 39:10 los 95:21 lose 58:5 lot 7:8,23 56:5 57:16 98:2 101:20 104:4 104:20,24,24 129:22 143:17 144:9 lots 65:18,19 130:21 loved 65:22,22 luck 98:18 lunch 114:12,15,16 115:7 119:25 luncheon 7:12 lunches 78:5 lutheran 37:17 42:18,24 lying 126:6 129:13	41:4,6,8,11,25 42:9 42:13,18 43:5,7,11 46:19 95:9 mails 22:10 23:1 27:21 37:8 41:2 main 34:9 maintenance 151:16 major 124:12 majority 18:21 108:9 makeup 125:20 making 11:20 13:10 63:1 70:21 82:6 94:20 95:13,15 112:10 man 34:13 management 55:24 84:5 mandates 116:13,22 mandatory 78:25 map 74:10,12 march 102:25 market 1:24 2:24 marshall 2:2 mastered 61:23 masters 5:12 69:17 match 146:16 material 71:21 72:8 75:7,12 materials 73:17,18 73:20 126:3 math 56:10 61:17 104:4 108:11 120:22 121:14,22 121:24 122:15 123:5 124:13 mathematics 148:22 matter 157:6 maturity 61:11,25 63:17 64:8 67:5 maura 1:14 mccaskey 8:15,17 8:22 9:2,8,20 10:3,4 10:6,9,13 15:8,22 17:8 18:12 19:1,15	50:16 51:19 58:13 60:16 62:20 63:2 64:25 65:13 66:21 66:22 67:7,10 69:22 70:8 73:10 74:1 75:9 76:6,7 77:7,17 78:17 79:13 85:5 89:11,23 94:6 97:17 97:24 98:3 100:4,10 100:20 101:1,15 104:12 105:19 107:4,14,19 115:20 116:10 117:3,12,15 117:22 118:9,21 119:4,15,19 120:2,5 120:6,8 121:2,9,22 122:23 123:8 124:2 124:10,19 139:2 140:3,5 141:12 142:13 144:1 145:8 148:18 149:6 151:6 154:16 156:5 mcinerney 1:14 meals 78:3 mean 6:11 24:15 30:17 39:1,23 41:5 47:6 71:24 79:6 84:21 114:1 meaning 94:5 meaningful 146:19 means 73:5 109:10 144:4 meant 106:24 media 150:8 medical 149:11 meet 11:1 12:16 14:19 50:15,23 86:13 meeting 25:7 26:12 26:14 29:12,23 30:4 32:9,13,20 33:24 34:7,8,12,19 36:3 37:5,16,22 39:19,19 42:17 43:9,12,17,20 43:21,24 44:4,16,19
	m		
	m 1:17 4:25 ma'am 5:10 51:16 68:18,24,24 magic 64:15 mail 22:17,20,24 23:4,17,21,23 24:8 24:15,17,19,22 25:1 27:2,3,7,9,10,18 28:7 29:3 37:13,17 37:20,24 38:5,21 39:7 40:12,13,24		

<p>46:16,16,18,19 47:3 49:15,22 50:8,23 51:3,8 81:6 86:20 86:23,23 87:3,4,12 98:16 meetings 35:7 130:25 megan 29:22 members 8:3 29:17 87:13 men 58:6 mention 33:15,17 mentioned 73:9 104:14 105:18,23 128:8 mentor 41:19 met 21:19,25 29:11 29:15,25 39:12 80:11 143:12 methods 72:13,14 mexico 7:13 mid 1:23 2:23 29:12 middle 6:7 31:15 140:20 141:2,4 midst 4:8 28:21 mile 10:7,14 military 52:19 60:3 millersville 5:11,12 minimum 89:2 117:1 minor 69:16 minus 115:7,8 122:24 minute 22:22 36:3 38:2,2 65:7 67:24 75:14 115:4 118:16 120:14 minutes 68:2,5 75:16 76:21 88:24 89:1 111:11 114:16 114:21 115:7,8 119:17,19,25 121:10,14,20,20,21 122:8,12,13,18,24 122:24,25 123:4</p>	<p>mirror 66:10 mislead 133:10 missed 125:20 mistake 23:16,17 27:8 42:4,8 mit 148:19 mixing 67:5 model 70:16 100:17 101:2,3 109:23 122:2 129:20 models 128:6 molly 1:17 moment 48:20 111:23,24 monday 97:19 115:21 money 7:21 66:1 monitoring 70:21 month 97:21 months 39:8,18,25 71:3 109:1,4 132:6 moon 1:13 morning 4:4,9,10,12 4:16 5:6,7 16:16,17 53:4 68:18,19 69:9 69:10 81:14 89:3 93:15,16 104:5 110:4,7,14 113:6,9 mother 14:19 36:11 36:23 53:5 106:21 motivated 52:12 move 55:7 60:2 65:4 80:16 86:22 114:1,5 moved 80:23 moving 21:6 45:22 49:18 140:22 mullen 1:10 multiple 74:25 114:18 multiply 121:13</p>	<p>73:5 153:13,17,21 name's 105:19 named 22:10,14 23:9 29:9 names 70:25 nation 11:15 national 1:23 2:23 58:1,2 59:24 nature 74:21 ncaa 143:25 144:4,6 near 155:8,9 necessarily 28:16 44:3 necessary 41:17 71:20 need 8:24 10:22 55:5 57:8 60:2 63:3 74:14 75:6,11 78:17 100:6 107:1,17 108:5,12 110:21 111:2,20 112:11 113:22 121:3 128:22,24 135:7 139:13 150:7 needed 74:15 86:22 99:19 107:7 113:20 124:10 131:2 134:2 134:23 needing 7:25 needs 26:24 71:21 72:25 85:6 127:12 135:24 146:24 neither 61:16 never 21:9,19,25,25 27:3 40:7 63:13 88:12 91:19 97:24 99:11,13 126:2,2 129:10 131:2,19 134:4,8 153:11 nevertheless 42:12 new 56:2 newspaper 17:2 night 60:16,17 71:12</p>	<p>nine 6:7,23 122:17 ninth 9:8,10 12:10 12:20 15:7 56:7,10 57:13,15,17,18 58:10 60:20 145:24 non 73:17 130:11,15 130:18 norm 126:8 normal 57:4 normally 61:19 79:15 norsham 76:5 82:14 105:19 106:5,7,13 north 77:4 96:2 nostalgic 66:3 note 86:12,16 notes 94:10 novels 73:22,24 november 30:12 31:19 33:6 38:8,15 number 12:7 19:6 44:2 66:19 116:10 117:1,11 134:13,15 146:14 154:10 numbers 90:3 95:4 nursing 149:13 nuts 41:9</p>
			o
			<p>o 1:18 4:1 o'donnell 2:2 4:9,10 4:14 5:3,5 16:6 49:9 49:10,13 53:15 54:7 60:22,24 61:2,5 62:13 67:16,18 68:2 68:15,16 69:6,8 91:9,21 92:2,4 93:3 94:15 102:1 117:25 138:12,15,19 150:10,15,19,24 151:7 152:15,18,22 o'donnell's 17:6 objection 117:25 objectives 143:11</p>

<p>observation 50:4 90:9</p> <p>observations 10:25 70:19 81:19 82:19 87:11</p> <p>observe 10:23 74:14 88:17 99:21 129:20</p> <p>observed 81:13 85:16,20</p> <p>observes 116:4,6</p> <p>obstacles 83:10</p> <p>obviously 23:3 72:10 74:12 81:13 85:16 154:24</p> <p>occupation 143:9,10</p> <p>occupations 141:23 142:2,17,22</p> <p>occur 25:8 26:10,24</p> <p>occurred 25:7 28:12 30:11 44:25</p> <p>occurrence 125:16</p> <p>odd 79:10 85:25</p> <p>offer 139:19 140:17 146:13</p> <p>offered 102:16 103:2 139:24 140:3 142:5 143:13 150:21</p> <p>offers 151:14</p> <p>office 30:16 33:9 44:1 45:24 81:6</p> <p>official 157:4</p> <p>oftentimes 30:18 64:21</p> <p>oh 35:17 91:8 138:17 152:18,24</p> <p>okay 9:12 10:8,15 11:24 12:4 13:1,21 13:25 15:25 17:1,18 18:2,9 19:10,24 20:9 21:7 23:2,19 24:3,6,14,19,25 25:20 26:2,7,10,23 27:2,16,25 28:10,18 28:24 29:1,2,8 30:6</p>	<p>31:9,11,19 32:4,9 32:22 33:3,18,24 34:8 36:5 37:21 38:4,14 39:1 40:6 40:16,19 41:2 42:21 44:16,23 45:13,21 46:21 47:2 48:4,11 48:19 49:16,21,24 50:18 51:4,17 54:3 58:14 60:21 62:24 64:2,5,11 67:15 68:18 69:19,23 70:2 70:25 71:8 75:22 81:10 82:8,18 83:17 83:20 85:13 86:8,15 87:2 88:5,8,11,20 88:23 89:21 90:13 91:8 93:3,9 94:3 95:21 96:6 97:1 98:2,7 99:22 100:15 100:24 102:12 103:9 104:1 105:23 106:19 107:12 108:2,14 110:13 112:17,20,24 113:2 113:13,18 114:4,9 114:12,21,24 115:4 115:16 116:18,22 117:6,15 119:3,6,14 119:17 120:16 121:9,17 122:6,8,10 122:17 123:20 124:2,24 125:10,13 125:18,22 126:1,5 126:15 127:15 128:1,8,13,20 129:7 129:13 130:9,25 131:6,19 132:4,17 132:20,25 133:3,10 133:16,18,22,25 134:4,18,22,25 135:3,12,16,19,23 136:1,5,9,18 137:2 137:6,13,18 138:1 139:8,11,19 140:2,5</p>	<p>140:17 141:4,7,10 141:21 142:11,16 142:22 143:4,17,21 144:4,9,20 145:1,10 145:21 146:11 147:10,17 148:1,15 149:1 150:15 151:13 152:2 153:3 153:7,10,17,20,24 154:9,17,18,21 155:6,8,9,16,19,24 156:4,7</p> <p>old 9:6,7,24 13:19 14:14 56:3 57:6 60:19 62:9 65:11 131:9</p> <p>older 13:7 14:1 20:1 20:2 50:21 56:11 60:15 61:21 63:20 64:18 67:5</p> <p>olds 9:1,11,16 54:11 61:12,12 62:1 63:19 141:8</p> <p>once 4:6 23:8 26:2 28:11 46:3 66:19 68:14 150:1</p> <p>ones 14:1 134:10</p> <p>open 52:18 79:17 81:11 109:8 117:3 117:15</p> <p>opened 138:23</p> <p>opening 21:5 110:9</p> <p>openly 79:25</p> <p>operate 101:1 113:7</p> <p>operates 98:3 100:9 100:17 115:16</p> <p>operating 149:14</p> <p>opportunities 9:19 9:20,22 13:14 14:10 77:24 78:21 143:17 146:23 152:21 153:4</p> <p>opportunity 9:25 11:22 22:1 23:25 76:24 77:5 88:17</p>	<p>90:16 117:17 149:10</p> <p>opposed 12:24 67:11</p> <p>option 53:13,14 80:18 103:2</p> <p>optional 79:1 105:12</p> <p>order 4:5 68:13 71:20 74:21 75:7,12 82:6 85:6 89:7 107:14 108:15 116:19 121:3 122:19 123:8,10 124:2 137:10</p> <p>orientation 60:17 77:21 83:13 133:6</p> <p>original 6:25</p> <p>orms 157:3,9</p> <p>ortiz 82:20</p> <p>outline 74:9</p> <p>outlining 75:1 77:22</p> <p>outset 74:20</p> <p>outside 10:7,14 13:22 20:4 29:25 78:21 93:10</p> <p>overall 123:14</p> <p>overcome 59:10</p> <p>overrule 118:2</p> <p>oversight 11:7,24</p> <p>overview 75:3</p> <p>owned 42:5</p>
p			
<p>p 1:18 4:1</p> <p>p.m. 1:5 113:4,17 156:9</p> <p>pa 1:5,12,16,18,21 1:22,24 2:4,24</p> <p>pace 65:7 75:6</p> <p>pacing 71:19 74:2,6 74:7</p> <p>page 3:9 18:4,6 22:25 29:4 31:10,15 38:5,9,10,11 134:13</p>			

<p>141:21 143:24,25 144:22 145:2,10 147:5,6,6,6,14 148:4,6,15 149:5 150:5 151:10 154:9 154:18 155:4,7,9,12 155:14,16,23 pages 74:25 134:14 139:8,10,11 144:10 pairs 126:21 paper 84:24 papers 26:3,19 30:10 32:19 39:9 45:17 paperwork 15:5 30:19 32:1 34:5 81:8 par 10:24 paragraph 25:5 141:25 142:11 143:9 145:22 146:12 pardon 15:21 parent 13:9 33:5,12 33:15 parentheses 136:23 137:3 parents 13:7 60:18 80:4 133:6,11 part 8:3 28:11 42:4 63:22,23,24 64:5 77:15 83:24 132:23 partake 10:2 34:6,8 37:5 79:5 participants 150:8 154:10 participate 9:16,24 11:9 14:14 34:12,19 35:4 76:22 102:11 103:24 104:13 105:15,24 106:3 108:4 109:5 140:20 142:18 154:14,16 participated 80:13 88:14 105:20</p>	<p>participating 43:12 82:22 85:5 102:16 105:17 participation 83:25 particular 22:14 23:9 110:6,13 111:17 123:18 128:25 129:10 130:2 143:5 144:20 particularly 77:16 parties 4:6 45:9,10 68:14 partners 149:19 partnership 142:12 142:24 parts 73:12 pass 108:11 path 12:17 63:7 pathway 83:7,9 86:17 pathways 58:4 59:25 pause 48:23 49:5 130:19 132:13 134:11 152:12,17 pde 57:23 peer 56:5 peers 12:14 56:18 56:20 57:9,10 84:19 85:17 91:4 pen 121:18 penn 59:22 pennsylvania 1:1,17 1:20 9:15 13:16 14:18 16:1,25 55:24 69:14 116:13,19,22 140:15 people 7:13 30:18 42:6,23 52:15,19,21 52:24 55:2 57:10 60:11 65:22 70:12 129:14,21 pepper 1:11 percent 9:5,6 19:5 19:10 136:19,22</p>	<p>performing 66:2 146:6 period 89:3,4 111:12,18 112:4,13 114:12,15 119:24 120:15 periods 100:12 117:20 118:22 119:3,9,12,14 person 42:13 86:25 129:25 130:1,4 person's 12:14 personal 146:21 personalized 146:1 146:15 personally 13:12 106:6 ph 59:21 76:4 130:20 philadelphia 1:12 1:16,18,22,24 2:24 96:3 phoenix 8:11,14,20 8:24 9:21 10:1,9 11:8 12:21 13:5 15:23 17:7 18:12,22 18:25 19:2,11,15,19 19:21 43:18 51:19 53:8 55:21 56:3,15 58:12 60:6 62:19,23 63:19,21,25 64:5 65:6 66:8 67:11 69:25 70:6,13 71:4 72:15 73:13 76:2 77:18 79:9 81:5,16 83:11,23 84:9 85:14 86:1,17 87:8 88:7 89:22 90:25 91:18 92:24 94:7 96:10,13 97:2,11 98:21 99:7 100:3,9,17 101:4 102:1 104:10 108:20 109:8 110:7 111:13 113:14 115:16,23 116:1,4,6</p>	<p>116:9,25 117:10,21 118:8,24 119:12 120:5,7,24 121:2 122:1,19,24 123:1 123:10 124:5,20,25 125:11,24 128:11 128:14,16 130:17 131:19,24 132:14 134:18 135:21 139:16,19,24 140:17 141:19 142:16 143:5,22 144:17 148:1 151:6 153:21,25 154:14 154:15 156:7 photocopied 125:14 126:3 physical 76:22 piece 11:12,14 14:8 66:13 76:17 93:17 pims 55:24 pittsburgh 1:20,21 place 44:13,14 55:25 66:21 111:9 placed 15:6 18:22 36:9 47:22 51:10 63:19 placement 11:25 13:3 15:18 19:11 20:17 26:6,7,10,20 26:24 32:14 43:23 44:24 47:3 51:18 58:16 139:24 140:2 placements 28:15 places 12:8 placing 28:4 48:1 63:20 plaintiff's 64:25 151:5 155:22 plaintiffs 1:10 39:17 50:15 66:15 109:3 125:23,23 129:9 134:9 135:20 plan 34:11,24 35:5 50:24 52:5 55:9</p>
--	--	---	--

<p>63:4 80:23 83:12 planned 85:22 plans 70:24 71:11 71:13,15,23 play 16:23,24 44:9 62:7 85:7 99:6 playing 155:3,13 please 4:17,21,22 5:9 22:6 68:20,25 118:5 149:5 155:3 155:23 plot 42:6 plus 104:5,5 108:21 point 35:21 39:25 47:13 55:5 66:6 98:2 120:2 policies 32:16 85:11 policy 28:3,9,12,13 28:16 32:18 46:6,10 51:18 52:2 63:24 64:1 79:17 81:11 population 35:12 portuguese 133:23 position 5:24 6:1,10 10:19 26:2 66:12,20 69:23,24 120:7 positions 70:3 possible 12:17 16:5 84:4 108:25 possibly 62:19 post 52:21 60:3 85:1 149:20 152:7 potentially 108:21 powerpoint 77:22 practice 10:24 11:5 28:17,18,20,25 52:2 64:1,2,3 76:24 90:7 practices 11:15 28:22 59:5 72:20 practicing 83:1 preceding 136:6 precise 151:4 predecessors 66:12 predict 67:9</p>	<p>preeminent 135:4 preferences 49:18 pregnant 58:7 preliminary 1:7 premise 65:16 prep 89:9 preparation 59:21 138:6 prepare 11:2 prepared 149:20 preps 6:14 present 4:6,6 68:14 68:14 75:20 presented 64:17 presently 5:16 prestigious 140:13 preventing 58:17 prevention 6:2,4 10:17 11:13,14 12:2 20:24 59:23 previous 103:7 previously 4:6 12:8 68:14 pride 53:4 principal 5:13 6:13 69:21,25 70:6,10 71:4 90:10 96:12,14 96:16,21,22,23,23 97:14,17 111:25 116:16,19 140:23 principals 10:23 70:9 print 95:13,15 printed 23:1 prior 24:16 69:23 94:2 131:25 pro 135:13 136:7 probably 19:9 21:3 25:15 28:17 35:18 46:11 64:10 66:24 67:1 98:14 113:24 155:7 problem 39:14,21 39:24 131:4 152:24</p>	<p>proceed 5:2 16:12 49:11 61:1 69:5 proceedings 157:5 process 14:11 25:12 25:19 26:14 34:22 35:23,23 43:24 44:11,24 46:9 47:3 47:9 132:23 processed 81:9 produce 59:8 91:21 92:11 94:10 produced 91:24 92:17 production 92:7 productive 52:15 59:12 60:2,10 professional 11:3,9 74:3 proficiency 136:10 136:13 137:14,19 137:22,25 138:3 program 7:25 8:12 8:15 56:16 65:1,2 66:9 73:7 76:1,6,8 76:10,11 77:7,15,22 78:2,10,22 79:3,5 79:11,21 80:13 82:13 84:23 88:4,10 90:17 91:5 94:19 95:8 96:19,20 97:6 99:7,18 100:9,11 102:3,4,5,7,11,13,17 103:1,5,8,12,25 104:14,16,22 105:20 106:4,9 125:5 126:14 131:16 132:2 134:3 134:15,19 136:9 138:20 140:8,9,14 140:18,21 141:2,11 141:13,23 142:2,3,8 142:13,17,22,25 143:1,3,5,19 147:2 149:9,25 150:6 151:6</p>	<p>programming 7:23 105:1 109:6 programs 17:7 59:5 99:19 105:12 107:23 143:13,14 150:22 151:15 156:4 progress 70:21 82:7 82:9 progressing 82:25 85:3 progression 82:16 project 75:1 promoted 12:9 56:9 84:10 137:10 pronounce 23:13 properly 50:9 proposed 61:9 proud 53:10 77:16 140:6,7 provide 10:12 37:25 74:23 76:15 80:8 82:4 100:23 116:25 117:17 126:17 150:7 provided 25:6,24 28:8 37:25 38:6 71:13,17,25 73:20 73:25 74:19 79:9 88:24 89:15 119:23 128:7 129:17 146:21 provides 117:11 147:22 149:10 providing 64:6 71:19 72:2 78:13 127:4 provisionally 50:19 public 13:17 16:1 20:11,13 54:11 55:22 56:22 57:7 131:14 147:18 purpose 15:25 52:6 76:9,23</p>
--	---	---	--

<p>pursue 149:20 push 62:7 89:12 128:6,14,15 129:2 130:3,10,15 pushing 128:9 130:6 130:8 put 42:4 53:12 58:9 61:17 84:25 85:9 95:3 putting 95:6</p>	<p>quickly 23:5 58:4 136:19</p>	<p>real 55:8,9 66:4 realize 100:25 130:1</p>	<p>red 10:4,11 redesigned 8:1 redirect 3:2 49:9,12 61:4</p>
<p>q</p>	<p>r</p>	<p>really 7:7 11:17,19 12:16 13:10 14:22 21:1 24:18 34:2,9 46:3,9 57:15 60:8 60:14 61:23 62:11 63:3 65:24 66:4 85:18 151:23</p>	<p>refer 68:1 reference 28:8 referred 29:6 65:12 155:12 referring 136:5 refers 29:5</p>
<p>qasin 29:6,9 31:8 32:17 33:25 36:5,14 40:6 47:18 49:15,25 50:4,14 85:13,15 87:13 qasin's 30:11 49:18 quadrant 18:6,6 qualified 65:23 89:6 89:7 107:24 qualifies 99:20 qualify 102:10 103:24 104:1,13 quality 58:10 quarter 124:9 quasi 6:13 question 18:9 33:8 41:17 46:11,14,15 48:3 49:1 53:18 56:21 58:25 60:8 64:14 78:16 95:1 99:22 100:25 118:3 132:9 134:7 154:22 questioning 59:17 73:2 102:1 110:17 150:17,25 questions 16:7 17:6 18:3 23:14,24 47:2 47:15 48:24 54:10 60:23,23 61:20 64:12 67:17,17 75:21 82:21 91:10 94:16</p>	<p>r 4:1 radiology 149:14 radius 10:7,14 rage 42:1 raise 4:18 68:20 raised 37:7,8,10 raising 24:2 ramifications 32:5 ran 91:2 range 55:13 111:8 154:10 rank 83:18 84:8 ranking 84:15 rarely 108:8 rate 82:1 rates 7:25 58:3 90:20 91:20,22 92:16 93:18 rating 136:24 137:4 rau 48:14 51:25 rau's 51:15 reach 56:22 66:19 84:22 reached 20:10 87:23 90:1 reaching 90:6 reaction 80:3 read 18:18 23:16 27:7,22 28:1,7 38:21 39:3 51:23 73:19 134:20 136:3 136:18,24 137:11 141:25 142:9 143:15 145:22 146:9,11,25 147:12 148:23 149:23 151:20 153:5 155:4 reading 73:19 reads 149:9 ready 23:24 72:22 80:16,22</p>	<p>reason 21:11 31:24 33:17 34:3,9 38:22 58:9 63:24 87:5 reasonably 59:4,6 recall 19:6 50:12 89:13 95:6,11 127:5 receive 15:1 49:17 102:24 103:6 117:21 118:9,11 120:8 received 27:18 86:18 receiving 76:15 78:24 recess 67:24 68:5 recessed 4:7 68:7 recognize 22:9 31:7 66:18 recognized 34:13 59:3 recognizing 64:23 recollection 39:11 83:8 reconvened 68:7 record 4:23 38:7 41:5 69:1 136:20 recording 156:9 157:5 records 25:6,24 39:4 39:18 recover 8:15 58:4 134:23 recovery 8:24 56:4 56:16 66:9 100:22 recross 3:2 53:17,21 62:15,16</p>	<p>refer 68:1 reference 28:8 referred 29:6 65:12 155:12 referring 136:5 refers 29:5 reflect 71:23 93:8 reformed 6:17 refugee 18:20 19:25 20:2,3 35:7 42:18 44:7 45:4 47:9,22 64:17 65:11 66:16 66:17 76:1 90:24 91:1,5 92:16,20 102:10 105:2,8 107:23,23 135:16 135:20 refugees 44:25 55:11 58:24 91:20 93:19 94:6,7 104:12 104:19 refused 51:5,6,7 regarding 63:6 regardless 20:18 152:7 regards 27:2 region 1:23 2:23 regular 57:12 125:15 regularly 85:20 125:13 regulations 13:16 relate 136:10,12 137:14 related 86:18 relating 70:17 relation 43:20 relationship 41:20 79:15,24 80:9 130:24</p>

relationships 146:19 relatively 66:18 released 79:14 reluctant 82:21 rely 84:11 remain 4:17 remember 17:18,21 22:2 24:4 29:12,22 30:8 37:22 42:20 43:10,14,20 44:21 47:5 84:2 remembered 81:21 reorganized 6:23 repeat 26:16 47:24 57:15 130:13 reply 27:20 report 83:21 91:21 94:10,11,24 reporter 157:13 reporting 1:23 2:23 25:12 represent 139:14 represented 7:10,14 7:18 39:8 request 19:12 91:16 92:7 requested 92:7 requests 19:18 require 135:6 required 72:10 108:6,11,19 117:1 124:13 requirement 45:6 115:11 requirements 137:9 requires 19:13 108:15 research 58:2 59:20 61:15,16 64:3 researches 74:3 reserves 20:16 resolution 55:4 respect 9:19 11:24 51:18 57:17	respectfully 51:24 respond 27:5 61:19 86:15 92:3 responded 23:17 response 17:6 23:20 27:17 41:2 responsibilities 11:12 70:14 responsible 48:5 rest 9:8 result 19:12 24:17 53:24 66:13 95:2 146:20 resulting 45:15 results 59:9 95:10 return 87:21 review 12:5 15:5 52:3 63:3 66:1 95:2 95:10 reviewing 28:22 revised 132:21,22 139:5 reward 76:20 reynold's 29:15 riddick 44:6 45:11 46:13 48:5 riddick's 48:12 right 4:18 17:3,8,10 18:6,22 19:2,8,15 20:1,11,13,16,20 21:15 22:15,19,21 23:3,6,10,15 24:4 24:12 25:2 26:3,13 26:21 27:11,14,15 27:20 29:9,15,18,23 30:6,7,25 31:2,20 32:10,14,25 33:23 33:25 34:3,14,23 35:8,12,18,19,24 36:3,6,12,14,17,24 37:3,6 38:14,23 39:5,9,14,24 40:5 40:14,24,25 41:12 42:14 43:15,18 44:18,22 46:23 48:6	54:18 57:22 58:16 59:14 60:21 68:20 70:7 73:4 74:23 85:24 94:7 95:13,22 96:4,10,13,24 97:3 97:15,18 98:3,9,12 98:21,24 99:7 100:7 100:8,18 101:1,5,8 101:16,25 102:3,9 104:6,10,17,23 105:12,15,21,25 107:1,5,20 108:5,16 108:23 109:4,8,14 111:22,25 112:1,2,4 112:25 113:15 114:10 115:1,8 116:14,16,20 120:9 120:12,17,21 121:6 121:16,23,24 122:1 122:6,8 123:23 124:8,8,18,25 126:18 127:1 130:12 131:10,14 132:7,15,18 133:1 134:23 135:1,14 136:7 137:4,7 138:11 139:6 140:15 141:15,17 144:7 147:15 148:11 151:11,22 151:25 154:24 rigor 66:8 rigorous 66:7 rise 4:2 68:6,9 rivera 71:2 road 74:10,12 robert 59:21 role 20:23 70:6,11 70:15 90:1 99:6 romanticizing 8:5 room 71:15 149:14 root 87:11 rose 10:5,11 rotation 100:14	rotations 110:21 127:23 rothschild 1:10 16:9 16:11,15 17:22 48:20,24 49:6,8 53:17,18,22 54:3 62:15,17 64:11 67:19,20,23,25 roughly 5:14 row 153:13,13 rubric 83:24,24 84:3 rule 16:22 17:1 run 104:22 runs 14:7 runway 65:12
s			
s 3:8 4:1 69:3 safely 32:1 saline 80:2 sat 125:22 saturday 53:4 saw 79:13 saying 10:10 21:7 21:10 26:17 27:4,4 28:11 41:3 44:23 45:25 103:14 107:12 110:15 111:17 126:5,7,11 126:12 137:24 140:24 144:15 says 9:15 20:21 24:20 25:4,23 27:13 28:7 29:6 31:16 37:24 38:6 41:10 58:2 59:25 61:16 132:19,25 134:15 134:18 135:15 136:24 137:3 138:9 139:5 141:22 142:1 142:24 143:9,25 145:23 147:7,10 151:13 153:3,12,15 153:21,21 154:2,6 154:19,21,23,24			

<p>155:2,17 156:1 scaffolding 73:1 schedule 85:22 89:13 110:22 111:15,20,22 112:2 112:9,10 113:8 117:4 118:16 120:3 schedules 129:5 scholarship 6:20 scholastic 9:23 school 1:5 5:19,21 5:23,25 6:6,7,8,18 6:23,25 7:3,7,20 8:10,19,21,23 9:16 12:1,11 13:12,13,17 13:18,19 14:6 16:1 18:25 19:25 20:5,10 21:1,12,20 24:11,12 25:13,21 26:21,25 28:5,14 32:12 33:11 33:14,16,16,21,22 34:18 36:12,23,24 37:3 38:7 40:7 42:6 43:22 44:13,25 45:14,16 46:8 47:23 48:2,16 51:12 52:5 52:11,18,24 53:2 54:16,17 55:13,17 55:21 56:13,25 57:5 57:13 58:22 59:2 61:8 63:18 64:7 65:6,13,17 66:24 69:20,22 70:1,22 71:12,17 73:21 74:10 77:12 78:4,5 78:7,15,18,22,24 79:23,25 80:14 83:23 84:5,21,23,25 85:6,10,15,17,19 86:7,9,11,12,21 87:6,7,8,15,22 88:3 89:23 90:1,8,20 92:17 96:3,6 97:14 97:22 98:23 100:7 101:5,10 102:4,13</p>	<p>102:17,20,23 103:5 103:7,11,12,20 105:11,11 106:7,8 106:25 107:13,17 109:7 110:22 111:1 111:5 112:12,20 113:8 115:17 116:2 116:3 117:14 125:7 125:8,20 126:9,10 132:17 133:8 137:15 139:2 140:6 141:3,13 144:1 145:25 147:18,19 149:6 150:2 153:7 153:14,17,21 154:3 155:3,14 156:2 schoolers 57:1 schooling 132:1 schools 14:4 19:1 58:2 60:14 72:18 90:8 92:25 117:17 125:9 140:15,16 142:5 science 69:15 146:7 sciences 148:22 149:3,6 150:4 scope 13:23 scores 90:16 92:9 sd 153:15 seated 4:5,21 68:11 68:24 second 22:5 25:10 27:18 31:4,5 39:16 65:9 89:18 135:12 136:22 143:8 152:14 155:6 secondary 7:5 52:22 60:3 149:20 152:7 section 155:10,16 see 9:2 11:20 15:10 18:8,13 23:8 24:9 27:14 29:4,6 31:12 33:7 38:5,8,9,16 39:4,10 40:3 77:5 82:8,15,24 92:20</p>	<p>134:16 137:19 141:22,23 143:24 144:1 147:7 153:13 153:14,19,20 154:4 154:7,11,19 155:12 156:1,2 seeing 24:4,15 72:6 75:5 seeking 78:21 seen 91:20 92:16 153:11 select 147:11 self 52:11 semester 20:11 71:7 75:9 82:12 85:3 100:13 101:8 102:20 103:5 122:2 137:7 semesters 101:10 102:21 103:11 108:21 send 41:5 63:25 95:9 129:1 sending 43:15 sends 27:13,20 senior 107:9 sense 35:19 53:3 65:10 100:11 105:4 sent 27:3 37:13,13 39:7 40:25 41:4,25 42:13 77:19 87:25 106:7,10 sentence 143:8 separate 80:11 92:20 94:7 95:14 104:17 138:1,4 separately 127:10 september 30:16,17 sequence 22:24 24:9 sequentially 25:1 series 24:7 41:22 serious 64:16 serves 143:10 service 7:16 147:18</p>	<p>services 42:19 134:1 servicing 73:6 session 1:3 set 37:8 67:4 83:12 110:5,6,13 111:12 111:17 120:16 sets 73:22 setting 67:12 76:25 seven 5:14 101:16 101:22 107:3,6 118:21 119:5,6,7 151:14 shares 114:17 sharing 61:13 sharon 2:2 sheila 157:3,9 sheltered 105:5,8 sherri 157:12 short 37:1 111:6 140:10 shorten 76:20 150:17 show 22:2 51:3,8 61:20 shy 61:21 siblings 36:8 55:1 56:7 106:16 sic 114:20 115:15 sick 88:16 side 61:16 similar 56:17 70:10 139:17 150:6 similarly 57:10 66:17 simply 35:1 46:17 150:20 simultaneously 128:3 single 75:1 94:9 127:17 sir 4:16,20,21,21 5:1 16:13 35:20 41:1 49:4 53:20 54:5,9 55:15 60:22 64:14 67:16,21</p>
---	---	---	---

<p>sister 76:5 82:14,16 105:18 106:5</p> <p>sisters 88:9 106:21</p> <p>sit 15:2 38:24</p> <p>sites 149:17</p> <p>sitting 129:24</p> <p>situated 66:17</p> <p>situation 27:8 37:12 41:14,15 42:1 58:9</p> <p>six 5:14 64:10 66:16 70:9 71:3 72:23 97:8 119:3,11 125:23 144:24,24</p> <p>sixth 7:1 134:13</p> <p>skills 60:2 76:25 78:13 83:2 89:9 99:19 136:2</p> <p>skits 7:18</p> <p>slc 147:7,11 148:19 149:1,7 150:6 151:11,14</p> <p>slcs 146:3 147:15,20 148:1,8,13</p> <p>small 6:9,11,13,14 6:18,24 8:16 58:21 66:18 126:20 145:11,17 146:2,3,5 146:13 147:22 150:20</p> <p>smaller 67:2,11 146:17</p> <p>smith 1:7</p> <p>smoother 98:5</p> <p>snow 116:6,7</p> <p>soccer 76:20</p> <p>social 66:5 135:13 135:13,17,19,23 136:7,7</p> <p>socialization 76:17</p> <p>socially 8:2</p> <p>somebody 108:25</p> <p>somebody's 57:6</p> <p>son's 53:6</p> <p>sonta 91:7,8</p>	<p>soon 16:18</p> <p>sorry 9:11 37:25 40:11 46:19 67:16 103:3 109:18 113:21 130:13 134:7 138:12,18 147:5 152:23</p> <p>sort 14:20 29:24 42:7 55:6 124:12</p> <p>sorts 58:8</p> <p>sought 21:12</p> <p>sound 19:8 30:7 59:3 64:3 157:5</p> <p>sounds 147:2 149:25</p> <p>spanish 133:15</p> <p>speak 25:17 33:1 40:20 45:18 46:13 57:11 58:25 129:6 134:9 135:18</p> <p>speaker 34:14</p> <p>speaking 55:12 76:25 127:6</p> <p>special 72:5</p> <p>specific 73:23 99:16</p> <p>specifically 50:12 72:21 78:3 92:9 94:1 95:16 97:1 127:6 129:6,17,23 137:21 138:5,9</p> <p>speed 44:10</p> <p>spelling 4:22 68:25</p> <p>spend 57:18 127:9 127:20 149:17</p> <p>spending 128:2,3</p> <p>spent 104:23 130:21</p> <p>split 70:11</p> <p>spoke 81:4</p> <p>sponsor 154:3</p> <p>sport 9:23 105:17</p> <p>sporting 154:11</p> <p>sports 9:16 16:23,24 154:13</p> <p>spring 80:2 82:12 96:21</p>	<p>square 1:12</p> <p>staff 45:11 87:13 98:16 106:18 146:4</p> <p>stand 4:15 68:4 88:5</p> <p>standard 11:7</p> <p>standards 11:1 57:23 71:16 74:11 74:16</p> <p>standing 4:17 126:18</p> <p>standpoint 33:9 65:16</p> <p>start 7:22 14:5 18:25 22:23 26:20 26:25 28:4 43:17,19 44:9 46:8 48:2 57:12 60:7 65:1,12 82:6 93:17 110:1,10 110:18 112:4,13,14 113:2 115:21,23 126:13 141:1</p> <p>started 6:5 20:5 27:10 32:2 47:22 48:16 58:10 66:25 87:15 96:22 106:9</p> <p>starting 61:7 86:1 110:6,8,9,14 111:15</p> <p>starts 5:22 12:11 20:11 22:25 24:24 111:18 113:21,22</p> <p>state 4:22 7:24 13:16 31:17 68:25 69:14 70:20 108:15 108:17 124:12 151:14</p> <p>stated 25:8 111:19 112:19</p> <p>states 1:1,8</p> <p>statistics 92:19</p> <p>status 102:10 137:3</p> <p>stay 11:4 44:9 60:14</p> <p>stayed 88:16</p> <p>step 25:7,10 26:8,11 26:14,20 28:3,13 67:22</p>	<p>stipulate 150:11</p> <p>stipulated 150:20</p> <p>stipulation 150:14 151:5</p> <p>stop 138:20 154:19 154:24,24</p> <p>strategies 59:23 64:4 72:15,17,23 73:3</p> <p>street 1:15,21,24 2:24</p> <p>streets 1:11</p> <p>strengths 146:23</p> <p>strike 11:25</p> <p>string 22:9</p> <p>strong 130:23</p> <p>strongly 55:8 82:12</p> <p>student 13:8 21:18 21:25 22:14 23:9 24:10 25:5,13,21,23 26:3,18,19,25 28:7 29:5,8,11 31:7,12 32:18 34:3 37:7 39:4 44:2 55:25 56:1,12 62:12 72:5 83:11 88:25 91:5 95:20 102:6,15 104:8,9 125:19 129:24 132:14,25 136:15,16 137:13 144:20 145:6 146:16,18 149:2 152:6</p> <p>student's 19:12,14 27:21 30:9 39:24 142:7</p> <p>students 6:14 8:14 8:18,19,23,23 10:6 11:1,16,18,20,22,25 12:5,6 13:6 14:1,11 15:3,10 16:4 18:20 18:21,21,24 19:14 19:21,25 20:2,9,25 21:8 28:4 33:11,16 35:7,15 44:7 45:3,3</p>
--	---	---	--

<p>45:4,7,15 46:7,7 47:10,22 48:1,16 51:18 52:4 53:5,11 56:6 57:24 58:4,21 59:10 60:1,15,19 61:8,9,17,19,21,25 62:5,18 63:20,25 64:7 67:10,14 70:5 70:5 71:9 72:1,7,20 72:22,24 73:7,14 74:17,19 75:3,6,13 75:18,22 76:7 77:13 77:17 78:3,17 79:2 82:2 84:7,10 85:2,4 90:3,5,16 91:1 92:20 94:12,20 98:6 101:5,16 102:1 104:12 105:2,14 108:7,15 109:10,25 110:4 114:5,19,19 114:21 115:20 116:2,9,11,14 117:21,22 118:8 119:1 120:7,8,11,17 123:8 124:24 125:6 125:10,13 126:8,15 126:20 127:3,8,9 128:17,23,25 129:18 130:7 133:1 133:3,7,11 134:20 135:6,17 138:1 139:17,20,24 141:13 142:18 143:11,19,22 146:4 146:7,14,20,21 147:7,11,23 148:12 148:21 149:10,12 149:19 150:1,6,7 151:23 152:4 154:14 155:13 studies 148:22 study 149:11 studying 80:21 style 78:9 109:24</p>	<p>subject 60:7 61:3 submitted 26:3,18 34:4 38:15 71:15 submitting 70:24 subset 58:21,22 substance 24:1 succeeded 94:21 success 53:12 65:20 90:18 successful 55:10 56:18 60:1 61:17 62:12 66:16,20 94:20 successfully 26:3 suggesting 22:21 33:10 57:13 sui 76:4 88:8 suite 1:15,24 2:4,24 summer 44:15 76:1 76:6,8,9,11 77:7,11 77:13,16 78:10,15 79:3,11,21 80:11 82:13,16 88:4,10,14 91:4 97:6 102:3,4,7 103:1,23 104:13,22 105:11,20 106:3,12 107:22 108:5 109:6 131:16 132:2 134:3 summers 76:2 79:22 supervise 10:23 46:12 supervision 71:10 supervisor 41:21 42:3 71:1 supervisors 42:14 support 15:12 52:16 54:22,24 55:3 58:7 78:23 84:13 86:13 87:10 88:2 89:13 92:23 93:1 128:6 129:23 130:6 146:16 supported 80:1 supporting 86:24 90:20 93:22</p>	<p>supportive 66:5 70:10 supports 15:22 82:5 89:14 supposed 155:13 sure 10:24,25 11:4 14:13 16:19 24:14 26:17 30:2,21 33:7 33:7 46:3 63:1,4 66:25 68:2 69:2,13 70:21 71:18 72:21 73:6 80:6 81:8 82:16 86:5 90:6 92:5 94:20 112:7,8 118:6 121:24 123:6 126:24 139:1 144:14 145:12 149:4 surprised 79:1,4 105:24 106:1 survey 77:19,25 surveys 15:1 suspended 53:7 suspends 33:13 sustain 52:16 136:2 swahili 133:16 swamped 44:7 switch 19:14 switches 100:12 sworn 4:19 68:22 syllabus 74:20,25 system 6:13 52:25 55:24 84:5 85:6</p> <hr/> <p style="text-align: center;">t</p> <hr/> <p>t 3:8 t&b 151:14 tab 22:6 138:23 153:1 table 151:5 tack 1:17 tailor 78:2 take 22:22 38:1 46:4 49:14 55:21 63:8 107:4,9 111:9</p>	<p>120:21 121:15 122:10,11 125:10 128:18 139:13 144:5 145:7 146:8 148:12 taken 39:3 takes 114:4 talk 9:18 10:15 13:7 13:8 14:9 23:21 24:1 40:25 47:6 59:16 60:11 62:23 73:2 79:25 83:13 109:7 128:8 talked 30:9 36:1 75:4 76:23 78:20 80:11,18 89:10 126:25 talking 14:5 44:18 46:3 55:12 63:15,16 63:17 76:12 92:5,9 130:21 talks 142:11 148:9 targeted 72:21 146:16 taught 89:5,11 95:21,24 96:2,9 99:13 117:23,24 118:14,14 120:12 120:13 128:11 taxpayer 42:7 52:13 teach 65:6,24 teacher 33:5,12,15 70:18 75:17,19 82:15 85:19 89:2,6 89:14 95:17 99:11 125:17 126:14,17 126:19 127:9,20,25 128:2,5,18,20 129:2 129:11,16,23 teacher's 65:21 teachers 61:20 65:21,23 70:23 71:9 71:11,18 73:4 74:8 74:14,23 75:2 81:23 82:19,21 84:24,24</p>
---	---	--	--

85:9 106:10 129:5 129:20,21 teaches 120:25 teaching 17:7 70:18 72:19 89:12,18 95:20 127:3 128:6,9 130:3,6,10,14 146:22 team 70:12 teams 154:3,23 technical 39:23 142:13 143:2,14 149:16 151:10,15 techniques 64:4 technology 142:21 146:7 148:18,23 149:14 tell 7:2 13:2 41:15 41:16 telling 12:24 38:14 120:4 133:8 template 112:10 temporary 55:4 ten 60:12 67:23 68:2 68:5 111:10 119:19 tenth 57:19 term 21:2,3 terms 11:7 14:3 19:20 28:3,4 47:21 48:15 50:7 71:8,24 72:12 73:8 74:22 83:7,8 84:16 86:16 terrific 149:25 testified 17:5 24:5 81:15 91:18 93:18 101:25 102:8 104:23 130:20 145:16 testify 125:24 129:10 testifying 91:24 testimony 17:10 51:15 64:24 65:15 81:19 83:17 92:15 93:10 128:9,13	145:13 testing 70:19,20 111:2 textbooks 73:16 thank 4:5,14,20 5:1 5:3 16:7,8 18:20 19:10 29:2 48:25 49:8 51:14 53:15,16 54:5 60:21 62:13,14 64:11,13 67:15,21 68:11,16,23 69:4,6 91:9,11 93:12 98:19 138:19 thanks 24:24 thanksgiving 33:4 33:21 theatre 17:2 theirs 16:21 theme 7:10 theory 56:20 58:15 58:20 59:2,3,7 89:17 thing 14:20 42:7 43:25 46:22 113:12 things 9:13 10:2 14:2 39:21 44:9 45:22 62:2,5 64:6 65:4 72:24 73:3 81:7 84:4,13 86:21 100:22 101:21 110:12,20 111:21 127:13 137:20,25 think 8:3 9:13 10:10 17:5,19 19:4 21:2,5 24:5 25:15,16 41:17 42:22 44:5,6 45:22 47:5 50:12 52:13 59:19 64:9 65:14 66:13 67:6 74:24 75:16 81:2 84:20 85:15 91:2 106:14 109:22 110:18 111:14 112:6,15,18 121:19 123:3 125:1 125:2,16 126:7,22	126:25 127:11,12 127:13 129:14,21 131:20 132:22 133:5,9,17 135:11 139:13 140:5 152:6 thinking 62:1 81:20 third 22:25 89:4 136:1 137:2 thirty 5:22 thought 9:14 34:1 36:10 37:19 41:25 79:10 three 7:21 8:6 9:3 27:21 33:23 57:4 75:25 77:14 80:11 95:19 102:8 107:18 107:24 109:17,18 109:18 113:25 114:6,10 115:6 117:7,16 127:16 128:1 131:13 134:12,19 136:9 thursday 76:18,20 till 56:22 time 6:22,25 7:4 9:7 11:16 21:9 28:24 32:17 33:13,13 34:1 34:22 35:3 39:1,5 41:9 44:7 45:23 46:1 49:22 50:10 59:7 61:18 71:22 75:17,18 80:3,14,17 81:7,13 82:9 83:14 85:16 86:1 87:17,23 89:2,25 90:9 91:2,2 92:15 95:20 97:12 98:17 102:15 104:24 106:8 110:1 110:4,5,7,8,10,11,14 110:18 111:8,12,17 111:21 112:4,19,20 113:2,13 114:4,8,17 114:20 115:7 117:12,18 118:13 118:20,22,25 119:1	120:16,20 121:21 122:11,19,22,25 123:7,14,15,17 124:4 125:3 126:17 127:9,20 128:2,3 129:15 130:21 131:23 132:6,8 139:14 149:17 timeclock 12:11 times 11:4 14:9 44:6 47:6 56:6 72:1 73:4 80:11 101:13 110:20,23 112:3,21 117:14 121:13,20 122:12,17,17 timing 43:19 title 10:16 today 128:9 145:15 told 38:17 49:19 80:12,20 81:4 86:11 119:10 tolls 33:12 tomorrow 98:16 101:19,20 tool 59:13 top 22:23 24:8,19,22 102:2 134:15 145:1 153:3,13 154:21 155:8,9 topic 37:17,19 total 97:8 122:10,12 123:21 154:10 town 77:1 109:13,19 110:1,9,14,24 111:8 112:24 113:2,15,21 113:22 track 15:18 58:13 trade 35:20 trades 151:16 traditional 84:21 training 142:7 149:16 transcriber 157:13 transcript 18:1 157:4
---	---	---	--

<p>transcriptionist 157:9</p> <p>transfer 62:19 79:13</p> <p>transferring 50:16</p> <p>transit 10:5,12</p> <p>transition 98:5 113:24 114:1 118:21,23,25 119:18,22</p> <p>transitioning 70:8</p> <p>transitions 119:18 119:21</p> <p>translate 80:5 133:13,16,18,20,22 134:3 141:3</p> <p>translated 134:2,8</p> <p>transmit 94:13,14</p> <p>transmitted 94:16</p> <p>transportation 10:4 10:12 80:8</p> <p>trauma 67:13</p> <p>traumatic 35:16 64:21</p> <p>trial 98:9</p> <p>tried 45:2</p> <p>trip 77:2</p> <p>trouble 53:8 88:21</p> <p>true 11:6 19:24 20:2 20:18 21:8 39:14 109:1</p> <p>trusting 122:15</p> <p>try 12:16,20,23 13:10 14:22 15:15 15:17 24:6 32:21 34:15 52:4 53:10 54:19,20 56:20 62:11 87:24</p> <p>trying 8:14 11:15 44:9,10 46:5 56:4 60:9 80:17</p> <p>tuesday 91:5</p> <p>turn 13:9 29:4 31:2 40:11,16,21 87:3 132:12 138:11 141:21 143:24</p>	<p>147:5,14 148:4,15 149:5 150:5 151:10 152:13 154:9 155:6 155:23</p> <p>tutoring 78:21</p> <p>twelfth 7:1 57:19 141:16</p> <p>twice 17:5</p> <p>two 1:12 6:6,9 10:7 10:14,22 11:4 16:20 17:19 33:22 39:7,25 46:10 66:12 67:14 76:2 79:21 85:1 88:8,21 95:14,24 100:7 101:10,13 102:20 103:11 106:10 108:21,23 109:6 117:17 119:14,18,22 129:1 131:16 134:12</p> <p>tying 74:16</p> <p>type 74:24 80:8</p> <p>typed 42:1</p> <p>types 14:2 72:10 126:23 148:12</p> <p>typical 127:15</p> <p>typo 25:16</p> <p style="text-align: center;">u</p> <p>uh 121:2</p> <p>ultimate 135:5</p> <p>ultimately 23:20</p> <p>umbrella 12:1</p> <p>underneath 70:7</p> <p>understand 13:11 20:9 26:17 28:10 35:24 42:9 47:20,25 64:15 74:14 94:3 95:1 101:4,15 118:3</p> <p>understanding 40:12,19,20 42:16 60:5 63:14,15 65:3 83:3 86:4 92:6 119:2 123:16 124:23</p>	<p>understood 23:12 106:24</p> <p>unfamiliarity 35:22</p> <p>unhappiness 79:12</p> <p>unhappy 88:13</p> <p>unidentified 49:3</p> <p>uniformly 55:20</p> <p>unique 41:20 58:21 78:1 142:8</p> <p>united 1:1,8</p> <p>university 5:11,12 5:14,15 59:22,25 69:14,16,18</p> <p>unofficial 41:19</p> <p>unpack 100:15</p> <p>update 53:6</p> <p>upper 56:1</p> <p>upset 42:10</p> <p>use 23:12 73:16 84:8 90:22 127:13</p> <p style="text-align: center;">v</p> <p>van 88:8</p> <p>varies 110:2,25</p> <p>various 147:15</p> <p>vary 45:19 113:7</p> <p>verifiable 121:20</p> <p>veritext 1:23 2:23</p> <p>version 22:19</p> <p>versus 8:19 46:25 85:11</p> <p>video 72:3</p> <p>viewed 74:12</p> <p>visit 77:1 106:7</p> <p>visitor 6:6 85:23 86:11</p> <p>visual 72:3 77:22 146:6</p> <p>visually 72:6</p> <p>vocational 142:3</p> <p>vouch 32:23 45:14</p> <p>vs 1:4</p>	<p style="text-align: center;">w</p> <p>wait 32:18 38:2</p> <p>walczak 1:19 91:13 91:15 92:14 93:12 93:14 118:6,7 138:14,17,20,22 150:13,23 151:2,9 152:25</p> <p>walk 21:4 53:3 54:18</p> <p>walkers 112:22</p> <p>walking 53:4</p> <p>walnut 1:15</p> <p>wand 64:15</p> <p>want 10:15 13:4,6 14:9 22:22,23 23:21 24:1 25:10 26:12,13 26:17 31:6 36:11 41:15 42:3 52:14,15 52:15,19,21 54:10 54:16 55:21 56:6,12 74:16 78:14 83:4 87:7 105:15 109:7 121:18 133:10 152:4</p> <p>wanted 36:22,23 49:19 63:14 66:22 80:13,21 81:8 86:14 87:7 88:2 97:5 132:1</p> <p>wanting 79:13 83:1 88:13</p> <p>wants 10:2 52:22 59:12</p> <p>warm 65:18</p> <p>warner 2:3</p> <p>way 24:6 26:10,11 27:5,6 29:4 30:2 31:25 32:23 44:10 53:12 56:16 58:13 65:1 70:15 78:5 79:4 84:9 89:23 92:19 93:5 121:16 122:14 143:20</p>
---	--	---	---

<p>155:7 ways 66:5,5 127:14 128:6 we've 11:16,19 13:6 44:15 76:12 77:16 77:17 90:16 91:1,19 92:16 112:2 wednesday 5:22 60:16 week 7:13 44:8 71:12,14,15 76:13 76:19 78:20 80:10 80:24 83:17 89:10 97:5 98:11 131:6 weekly 70:24 71:11 85:1 weeks 17:19 32:24 39:18 78:6 85:1 welcoming 66:4 wellness 115:9 went 5:11 6:8,10 7:21 53:6 67:7 86:2 86:4 94:8 107:18,22 123:20 widener 5:15 widener's 5:13 willing 150:11 winter 96:20 witness 3:2 4:13,19 4:24 16:10 54:14,18 55:15,19,23 56:23 57:2,22 58:18,23 59:14,18,20 65:14 66:23 67:8,24 68:1 68:15,22 69:2 91:14 91:24 92:22 93:11 118:4 witold 1:19 wonder 67:9 wondering 67:8 word 8:5 23:13 121:15 words 57:10 work 10:22 11:21 31:22 41:24 49:20</p>	<p>54:22 72:5 73:1 80:17 86:10 105:16 125:20 126:9,10,13 129:3 147:19 149:15 workbook 73:18 worked 43:25 82:4 97:24 99:11 103:8 106:22 132:4 138:15 worker 22:10 29:22 30:3 81:3 workers 36:16 37:16 40:8 working 10:25 35:14 65:22 82:12 86:10 90:11,18 94:24 106:12,15,23 106:24 107:10 126:15,20 works 70:15 workshops 11:17 world 111:14,16 worried 16:20 worthy 55:6 would've 71:5 89:14 97:19 wouldn't 66:23 124:11 125:15 write 94:22,25 writing 72:25 95:3,7 written 138:8 wrong 25:20 51:4 wrote 41:13</p>	<p>year 5:22 7:15 9:1 9:11,15 11:4 45:1 54:10 57:17,18,24 60:19 61:11,12 62:1 62:9 63:18 65:1,11 65:13 73:21 74:10 75:2,9 78:4,23,24 79:23 83:15 90:2,15 95:21 96:16 97:2 100:13 101:5,11,16 101:23,24 102:24 102:25 103:4,7,12 103:17,18 104:8,9 105:20 107:3,6,9 108:21 112:3,5 116:14 117:5 119:10 121:3,7,11 132:18,21,22 140:19,19 141:1,8 153:8 year's 120:3 yearbook 17:2 years 6:6,7,10 7:22 8:6 9:3,6,7,24 13:18 14:14,17 56:3 57:4 57:5,6,6 60:12,13 64:10 94:9 95:18,19 95:19,24 97:9,15 107:4,8,14,19 108:23 109:6 112:1 131:9,13,16 140:21 141:2,4 yep 22:8,13 york 56:2 young 34:13 52:17 55:2 58:6,6 younger 56:7 61:18 62:4 63:9 64:18 67:5 106:16,21</p>
	x	
	x 3:1,8	
	y	
	y 69:3 yeah 6:22 33:23 38:11,13 40:15 47:25 109:10,16 140:13 154:13 155:2	
		z
		zero 12:10 14:12 55:25 56:2 zoo 77:2 88:15