

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

BARBARA ANN WILSON,)	
)	
Plaintiff,)	
)	
v.)	2:10-cv-02386-KOB
)	
WELLS FARGO BANK, N.A.)	
)	
Defendant.)	

PLAINTIFF'S EXHIBIT LIST

The Plaintiff anticipates offering the following exhibits into evidence at trial:

Primary Exhibits

1. Audio tape of conversation between Wilson, Jackson and Angela Hall.
2. BPL Internet Access Policy – Blalock Depo. Defs Ex. 2
3. BPL Library Rules – Blalock Depo. Defs. Ex. 3
4. City of Birmingham Sexual Harassment Policy Handbook – Blalock Depo. Ex 2.
5. BPL Staff Manual 2002 – Blalock Depo. Ex. 5
6. BPL Library Rules Sheet – Blalock Depo. Ex. 4
7. Wilson Reports of Harassment – Blalock Depo. Ex. 6
8. Jackson October Report - – Blalock Depo. Ex. 7
9. Clotfelter email to Lee of 8/26/09 w/Wilson memo attachment

10. Clotfelter email to Lyons of 10/30/09 w/Clotfelter memo attachment – Blalock Depo. Ex. 11
11. Clotfelter email to Lyons, Blalock of 11/5/09 w/Safety Committee comments attachment – Blalock Depo. Ex. 12
12. Lyons memo of 10/20/09 – Blalock Depo. Ex. 9
13. Major memo to Blalock of 10/22/09 – Blalock Depo. Ex. 10
14. Wilson email to Clotfelter of 12/2/08 w/attached report – Blalock Depo. Ex. 13
15. Wilson email to Jackson of 10/12/99 w/attached report – Blalock Depo. Ex. 14
16. Wilson email to Clotfelter et al of 10/28/09 – Blalock Depo. Ex. 15
17. Wilson email to Lyons et al of 5/25/10 w/attached report – Blalock Depo. Ex. 16
18. Wilson email to Clotfelter et al of 7/17/10 – Blalock Depo. Ex. 17
19. Wilson email to Clotfelter et al of 11/24/10 – Blalock Depo. Ex. 18
20. Wilson Feb 06 Monthly Report – Blalock Depo. Ex. 19
21. Wilson Aug 08 Monthly Report – Blalock Depo. Ex. 20
22. Wilson Jan 07 Monthly Report – Blalock Depo. Ex. 21
23. Wilson Aug 09 Monthly Report – Blalock Depo. Ex. 22
24. Wilson Sept 09 Monthly Report – Blalock Depo. Ex. 23

25. Wilson Oct 09 Monthly Report - – Blalock Depo. Ex. 24
26. Wilson Dec 09 Monthly Report – Blalock Depo. Ex. 25
27. Wilson Jan, May, June, July, Aug, Sept, Oct 10 Monthly Reports – Blalock Depo. Ex. 26
28. BST Interview Notes of 11/2/10 – Blalock Depo. Ex. 27
29. Compiled Downloaded and Printed Internet Pornography - – Blalock Depo. Ex. 28
30. Defendants' 11/6/09 Response to EEOC Charge – Blalock Depo. Ex. 29.
31. Blalock email to bpl-all of 11/1/10 – Blalock Depo. Ex. 30
32. Blalock letter to Wilson of 11/22/10 – Blalock Depo. Ex. 31
33. Shelton email to all (BPL Security Survey) of 9/1/09 – Blalock Depo. Ex. 32
34. Patron Incident Report of 7/24/07 – part of Blalock Depo. Ex. 33
35. Wilson Incident Report of 7/14/08 – part of Blalock Depo. Ex. 33
36. Hutto memo re 11/29/08 – part of Blalock Depo. Ex. 33
37. Wilson email to Clotfelter of 12/2/08 w/attachment – part of Blalock Depo. Ex. 33
38. BPL Daily Activity Sheet of 12-2-08 – part of Blalock Depo. Ex. 33
39. Wilson Incident Report of 1/12/10 – part of Blalock Depo. Ex. 33
40. Wilson Incident Report of 10/12/09 – part of Blalock Depo. Ex. 33

41. Broussard Special Incident Report of 10/19/09 – part of Blalock Depo. Ex.

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42. BPL Daily Activity Sheet of 10/18/09 – part of Blalock Depo. Ex. 33

43. Wilson email to Jackson 10/12/09 w/attachment– part of Blalock Depo. Ex.

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44. Wilson/Broussard Incident Report of 1/12/10 - – part of Blalock Depo. Ex.

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45. Wilson Incident/Offense Report of 1/12/10 – part of Blalock Depo. Ex. 33

46. Jackson email to Hall of 11/19/10 – part of Blalock Depo. Ex. 33

47. Wilson email to Lee of 11/24/10 – part of Blalock Depo. Ex. 33

48. Lyons email thread to Blalock of 11/24/10 – part of Blalock Depo. Ex. 33

49. Blalock email thread to Lee of 11/30/10 – part of Blalock Depo. Ex. 33

50. Jackson BPL Incident/Offense Report of 12/6/10 w/attachments – part of

Blalock Depo. Ex. 33

51. Kline BPL Incident/Offense Report of 1-16-11 – part of Blalock Depo. Ex.

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52. Jackson BPL Incident/Offense Report of 2/1/11– part of Blalock Depo. Ex.

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53. Security Do's and Dont's – Blalock Depo. Ex. 34

54. Lyons email to ADCOU of 8/27/09 – Blalock Depo. Ex. 35

55. City of Bham Sexual and Gender Harassment Policy revised 9-14-98 –
Blalock Depo. Ex. 36
56. Wilson EEOC Charge of Discrimination of 10/7/09
57. Amended Complaint
58. Defendants' Amended Answer
59. Wilson EAS Medical Records
60. Wilson Medical Records – Grayson & Associates
61. Wilson Medical Records - UAB
62. Wilson Job Description/Class Specification
63. Security Guard Manual – BPL
64. Log in Procedures and Policy for Public Computer Use at BPL
65. Carter letter to Wilson of 10/19/10
66. Winslett letter to Major of 10/26/10
67. Winslett letter to Major of 10/13/10
68. Grayson & Assoc prescriptions to Wilson of 12/2/10
69. Wilson Request for Leave of Absence of 12/2/10
70. Wilson FMLA Certification of 12/2/10
71. Wilson Med Doc for Req for Leave of Absence of 6/2/11
72. Wilson Req for LOA Med Documentation of 6/5/11
73. Blalock letter to Wilson of 6/10/11

74. Wilson Applic for IWP of 2/24/11
75. Taylor Memo of 12/23/10
76. Freeman Note to Major of 10/11/10
77. Employee Incident/Injury Statement of 9/28/10
78. Taylor letter to Blaylock of 4/7/11

Optional Exhibits

79. Blalock Depo. Ex. 8
80. BPL Staff Manual 2000– Blaylock Depo. Ex. 3
81. City of Bham Personnel Handbook – Lollar Depo. Ex. 39
82. City of Bham Supp. Pers. Policies – Lollar Depo. Ex. 40
83. City of Bham New Employee Handbook - Lollar Depo. Ex. 42
84. Wilson Personnel File – Lollar Depo. Ex. 43
85. Birmingham City Code- Article E – Birmingham Library Board
86. Chronological Personnel Action Form for Wilson
87. Wilson Evaluation 2010
88. Any exhibit listed on Defendants’ Exhibit List.
89. Any document needed for rebuttal/impeachment, including deposition transcripts.
90. Demonstrative displays of documents listed herein (powerpoint/overheads, pc animations, enlargements).

Respectfully submitted,

/s/ Adam Morel

Adam Morel

Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on all counsel of record by electronic filing.

This the 23rd day of March, 2012.

s/ Adam P. Morel

OF COUNSEL