DECLARATION OF JOHN HOUSTON SCOTT IN SUPPORT OF AND MOTION TO COMPEL DISCOVERY

28

- 2. I believe all of the attached documents are true and correct copies as described below that relate to Defendants' termination of Laura E. Carrasco in 2002.
- 3. For the Court's convenience, attached hereto as **Exhibit 1** is a true and correct copy in of the Plaintiff's Request for the production of Documents, Set Two. ("Discovery Request").
- 4. Attached hereto as **Exhibit 2** is a true and correct copy of the Defendant San Ramon Valley Unified School District's Response to Plaintiff's Request for the Production of Documents. ("Discovery Response").
- 5. Attached hereto as **Exhibit 3** is a true and correct copy of plaintiff's first written attempt to meet and confer with the defendant dated May 10, 2005.
- 6. Attached hereto as **Exhibit 4** is a true and correct copy of Excerpts from the deposition of Mr. David Lake, taken on June 10, 2005. ("Lake Depo").
- 7. Attached hereto as **Exhibit 5** is a true and correct copy of plaintiff's second written attempt to meet and confer with the defendant dated June 14, 2005.
- 8. Attached hereto as **Exhibit 6** is a true and correct copy of defendant's written response to plaintiff's attempts to meet and confer dated June 16, 2005.
- 9. Attached hereto as **Exhibit 7** is a true and correct copy of plaintiff's written request to counsel for Sodexho, pursuant to counsel for the defendant's request, dated June 23, 2005.
- 10. Attached hereto as **Exhibit 8** is a true and correct copy of the petition submitted to the School Board by Laura Carrasco on October 8, 2005. ("Petition").
- 11. Attached hereto as **Exhibit 9** is a true and correct copy of the Notice of Prediscplinary Hearing provided to Laura Carrasco ("Notice").
- 12. Attached hereto as **Exhibit 10** is a true and correct copy of Excerpts from the deposition of Mr. Larry Shannon, taken on March 22, 2005 ("Shannon Depo").
- 13. Attached hereto as **Exhibit 11** is a true and correct copy of Larry Shannon's Resume, provided to the Plaintiff on March 22, 2005. ("Shannon Resume").

28

24

25

26