

EXHIBIT 2

1 LOUIS A. LEONE, ESQ. (CSB #0099874)
2 **STUBBS & LEONE**
3 2175 N. California Blvd., Suite 900
4 Walnut Creek, CA 94596
5 Telephone: (925) 974-8600
6 Facsimile: (925) 974-8601

7 Attorneys for Defendant
8 SAN RAMON VALLEY UNIFIED SCHOOL
9 DISTRICT

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 LAURA E. CARRASCO,

13 Plaintiff,

14 vs.

15 SAN RAMON VALLEY UNIFIED SCHOOL,
16 DISTRICT and DOES 1 through 25,
17 inclusive,

18 Defendant.

) **Case No.: C04-2395 CRB**
)
)
)

) **DEFENDANT SAN RAMON VALLEY**
) **UNIFIED SCHOOL DISTRICT'S**
) **RESPONSE TO PLAINTIFF'S REQUEST**
) **FOR PRODUCTION OF DOCUMENTS,**
) **SET TWO**

19 Defendant, the SAN RAMON VALLEY UNIFIED SCHOOL DISTRICT, hereby
20 responds to plaintiff's Request for Production of Documents, Set Two, served on or
21 about March 29, 2005, as follows:

22 **DOCUMENT REQUEST NO. 9:**

23 Any and all DOCUMENTS evidencing agreements between the San Ramon
24 Valley Unified School District and the food service company commonly known as
25 "Sodexo", from 2000 to the present, including but not limited to, those related to Larry
26 Shannon, Sandy Queirolo and Bessie Argallon.

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1 **RESPONSE TO REQUEST NO. 9:**

2 Defendant objects to this request on the grounds that it is overly broad, vague,
3 and ambiguous, and calls for the production of documents not likely to lead to the
4 discovery of admissible evidence. Defendant further objects on the grounds that this
5 request violates third parties' rights to privacy guaranteed by the Cal. Constitution, Art.
6 I., Sec. I., and defendant is further unable to produce said documents due to the
7 existence of binding contracts which assure the confidentiality of third parties will be
8 maintained.

9 **DOCUMENT REQUEST NO. 10:**

10 Any and all DOCUMENTS evidencing any policies relating to supervising, hiring,
11 using, calling or relying upon family members to act or work as substitute custodians in
12 the district

13 **RESPONSE TO REQUEST NO. 10:**

14 Defendant objects to this request on the grounds that it is overly broad, vague,
15 and ambiguous. Without waiving the foregoing objections, and subject thereto,
16 defendant responds that it will produce all documents within its custody, possession or
17 control.

18 **DOCUMENT REQUEST NO. 11**

19 Any and all DOCUMENTS concerning Laura Carrasco maintained by individuals
20 in the District or at the San Ramon Valley High School site, including but not limited to
21 Sylvia Ryan, Dave Lorden, Larry Shannon, John Caldecott and Thomas Jamison.

22 **RESPONSE TO REQUEST NO. 11**

23 Defendant objects to this request on the grounds that it is overly broad, vague,
24 and ambiguous, and repetitive of prior requests. Without waiving the foregoing
25 objections, and subject thereto, defendant responds that to the extent that any
26 responsive documents exist, it has previously produced all documents within its
27 custody, possession or control.

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DOCUMENT REQUEST NO. 12:

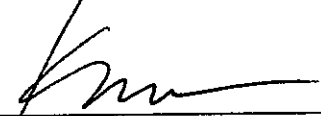
Any and all DOCUMENTS concerning any performance evaluations of Laura Carrasco prepared by Sylvia Ryan in draft or final form.

RESPONSE TO REQUEST NO. 12:

Defendant objects to this request on the grounds that it is overly broad, vague, and ambiguous. Without waiving the foregoing objections, and subject thereto, defendant responds that to the extent that any responsive documents exist, it has previously produced all documents within its custody, possession or control.

DATED: April 28, 2005

STUBBS & LEONE



KATHLEEN DARMAGNAC, ESQ.
Attorneys for Defendant
SAN RAMON VALLEY UNIFIED SCHOOL DISTRICT