

EXHIBIT 10

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LAURA E. CARRASCO,)
)
Plaintiff,)
)
vs.)
)
SAN RAMONE VALLEY UNIFIED)
SCHOOL DISTRICT, and DOES)
1 through 25, inclusive,)
)
Defendants.)

Case No. C04 2395 CRB

Deposition of
LAWRENCE L. SHANNON
March 22, 2005

Reported by:

STEFANIE L. McMURTRIE, RPR, CSR No. 11143

COPY

JAN BROWN & ASSOCIATES
CERTIFIED SHORTHAND REPORTERS
476 Jackson Street, 2nd Floor
San Francisco, California 94111
(415) 981-3498

1 answer as to why he left Sodexho's employment and
2 became employed by district. He's not going to answer
3 these questions. It violates his right to privacy.
4 We'll stipulate on the record it has nothing to do
5 whatsoever with Ms. Carrasco's case or Mary Glenn.

6 BY MS. DE VRIES:

7 Q. Were you ever advised that there might be a conflict
8 for the district to be employing a Sodexho employee?

9 A. A conflict, no.

10 Q. Are you aware of any food service contracts that
11 Sodexho has with the district?

12 A. Yes.

13 Q. Could you please describe what type of contracts
14 you're aware of?

15 A. It's a consulting contract.

16 Q. What is a consulting contract in Sodexho's terms?

17 A. I am not conversant with the Sodexho contract for food
18 service.

19 Q. But do you understand that the consulting contract
20 relates to providing food services?

21 A. Not providing food services but consulting on food
22 services.

23 Q. Do you know if the district consults on food services
24 with any other companies?

25 A. No.

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1 A. You go through an interview process, which is a
2 process of elimination, a couple of interviews.

3 Q. So do you remember having two interviews?

4 A. Yes.

5 Q. And who interviewed you?

6 A. There was a committee, a very large committee, and I
7 was interviewed by the deputy superintendent for HR
8 and the deputy superintendent for business.

9 Q. Did anybody else apply for this job, to your
10 knowledge?

11 A. Yeah, there were several.

12 Q. Approximately how many?

13 A. I have no idea.

14 Q. Do you know if it came down to just a select few for
15 the final decision?

16 A. I don't know. They didn't give me that information.

17 Q. But you have information that there were other
18 applicants?

19 A. I know there were other applicants.

20 Q. How do you know that?

21 A. I saw them waiting outside the interview room.

22 Q. Did you see more than ten?

23 A. I don't remember.

24 Q. But you saw at least one other applicant?

25 A. Oh, there were several of us out there. I don't
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1 Q. So do you know that they don't or you don't know if
2 they do?

3 A. They don't.

4 Q. So Sodexho is the exclusive company?

5 A. Yes.

6 Q. Do you know for how long Sodexho has had an exclusive
7 consulting contract for food services with the San
8 Ramone Valley High School District?

9 A. No, I don't.

10 Q. Was the contract in place when you came on board as
11 interim director in approximately October 2002?

12 A. Yes.

13 Q. During your stint as the interim director and an
14 employee of Sodexho, was it Sodexho that paid your
15 salary?

16 A. Yes.

17 Q. Did the district provide you any benefits?

18 A. None.

19 Q. At some point did you apply for a permanent position
20 at the district?

21 A. Yes.

22 Q. What kind of process did you go through for this
23 application?

24 A. The same process that all applicants go through.

25 Q. And what is that?

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1 remember how many.

2 Q. Okay. Did you ever discuss with anybody who was
3 employed at Sodexho the issue of Laura Carrasco's
4 circulating that petition you looked at earlier?

5 A. Pardon me?

6 MS. DE VRIES: Could you repeat the question,
7 please.

8 (The reporter read the pending question.)

9 THE WITNESS: No.

10 BY MS. DE VRIES:

11 Q. At some point did you become acquainted with Bessy
12 Argallon?

13 A. Yes.

14 Q. When was that?

15 A. After I'd been here for a short time.

16 Q. So sometime after October 2002?

17 A. Yeah, I guess so.

18 Q. On your résumé it says that you were at the Oregon
19 location until June 2002. What did you do from June
20 2002 until October 2002?

21 A. I was not here.

22 Q. Were you affiliated with the San Ramone School
23 District in any way?

24 A. No, I was not.

25 Q. Did you become affiliated with anyone at the San
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14 Deposition of
 15 LAWRENCE L. SHANNON
 16 March 22, 2005

20 Reported by:
 21 STEFANIE L. McMURTRIE, RPR, CSR No. 11143

23 JAN BROWN & ASSOCIATES
 24 CERTIFIED SHORTHAND REPORTERS
 25 476 Jackson Street, 2nd Floor
 San Francisco, California 94111
 (415) 981-3498

1 BE IT REMEMBERED THAT, pursuant to Notice of
 2 Taking Deposition, and on Tuesday, March 22, 2005,
 3 commencing at the hour of 10:15 a.m., in the Law
 4 Offices of The Scott Law Firm, 153 Townsend Street,
 5 Suite 950, San Francisco, California 94107, before me,
 6 Stefanie L. McMurtrie, RPR, CSR No. 11143, State of
 7 California, there personally appeared:
 8

9 LAWRENCE L. SHANNON,

10 called as a witness by the Plaintiff, who being by me
 11 first duly sworn, was thereupon examined and
 12 interrogated as is hereinafter set forth.

13 ---oOo---

14
 15 LIZABETH N. DE VRIES, Attorney at Law, of The
 16 Scott Law Firm, 153 Townsend Street, Suite 950, San
 17 Francisco, California 94107, appeared as counsel
 18 on behalf of the Plaintiff, Laura E. Carrasco.
 19 (415) 442-5100.

20 KATHLEEN DARMAGNAC, Attorney at Law, of Stubbs &
 21 Leone, 2175 N. California Boulevard, Suite 900,
 22 Walnut Creek, California 94956, appeared as
 23 counsel on behalf of the Defendant, San Ramone
 24 Valley Unified School District. (925) 974-8600.

25 LAURA E. CARRASCO, Plaintiff, was also present.

1 I N D E X

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3 Examination by Ms. de Vries	4
4 Reporter's Certificate	178

7 I N D E X O F
8 E X H I B I T S

10 Plaintiff's No.	Page
11 16 Re-Notice of Deposition and	152
12 Request for Documents for Larry	
Shannon dated 2/16/05	
13 17 Two-page Résumé of Lawrence L.	154
14 Shannon	

16 I N D E X O F
17 C E R T I F I E D Q U E S T I O N S

18 Page	Line	
19 158	17	Q. Why did you leave Sodexho?
20 158	24	Q. Did you make a decision to leave
21		Sodexho based on anything to do
22		with the San Ramone Valley School
23		District?
24 168	23	Q. How did it change?

1 MARCH 22, 2005 - TUESDAY 10:15 A.M.
 2 P R O C E E D I N G S

3 ---oOo---

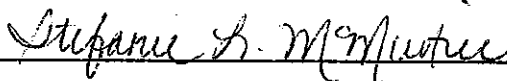
4 EXAMINATION BY MS. DE VRIES:
 5 Q. Good morning, Mr. Shannon.
 6 A. Good morning.
 7 Q. My name is Liza de Vries. I am the attorney
 8 representing Laura Carrasco in her lawsuit against the
 9 San Ramone Valley School District.
 10 A. Uh-huh.
 11 Q. Today we are here for your deposition which is going
 12 to be recorded word-for-word in a transcript that is
 13 being typed right now by madam court reporter.
 14 Therefore, it's very important that we follow some
 15 rules about depositions in terms of being able to
 16 create a transcript that one can read. Okay?
 17 A. Uh-huh.
 18 Q. So the first rule, and you're doing very well, is to
 19 wait for me to ask a question and then for to you
 20 respond to the question in verbal or oral responses.
 21 Okay?
 22 A. Okay.
 23 Q. So nodding of the head or rolling of the eyes, these
 24 kinds of things can't be recorded. So if you could
 25 please respond using words, that would be very

1 STATE OF CALIFORNIA) SS.

2 I do hereby certify that the witness in the
3 foregoing deposition was by me duly sworn to
4 testify to the truth, the whole truth, and nothing but
5 the truth in the within-entitled cause; that said
6 deposition was taken at the time and place therein
7 stated; that the testimony of said witness was
8 reported by me, a Certified Shorthand Reporter and a
9 disinterested person, and was under my supervision
10 thereafter transcribed into typewriting, and when so
11 transcribed was carefully read to or by the said
12 witness, and, being in every desire, was thereafter by
13 the said witness duly subscribed; that if unsigned by
14 the witness, signature has been waived in accordance
15 with stipulation between counsel for the respective
16 parties.

17 And I further certify that I am not of
18 counsel or attorney for either or any of the parties
19 to said deposition nor in any way interested in the
20 outcome of the cause named in said caption.

21 IN WITNESS WHEREOF, I have hereunto set my
22 hand this 11th day of April 2005.

23 
24 _____

25 STEFANIE L. McMURTRIE, RPR, CSR
Certified Shorthand Reporter, No. 11143