

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 09-cv-02243-RPM-MEH

JUDY JARAMILLO,

Plaintiff,

v.

ADAMS COUNTY SCHOOL DISTRICT 14,

Defendant.

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**ORDER**

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**Michael E. Hegarty, United States Magistrate Judge.**

After consideration of Plaintiff's Modified Proposal [filed January 31, 2011; docket #98], the Court enters the following order.

Regarding the certification of Plaintiff's computer expert, Plaintiff shall produce her expert's C.V. and a listing of any licenses related to computer database searches to Defendant on or before **February 4, 2011**. In consideration of Plaintiff's expert's previous approval by a District Judge in this District, the Court will not require proof of CHFI certification.

Regarding the electronic search terms, the Court instructed Plaintiff to narrow her search terms and query methodology to fit the discovery requests at issue, that is, Interrogatory No. 6 and Request for Production Nos. 1 (as to Interr. 6), 3, 4 as to Plaintiff only, 5, 6, and 7. Plaintiff did not do so, thus the Court will determine what terms are appropriate. The Court will permit the following search terms:

Interr. No. 6 and RFP Nos. 1 and 3: Susan Chandler (or Sue Chandler) **AND** one or more of the following terms: Lynn Heintzman, Janelle Sueltz, Phil Bedford, John Albright, Anna Garcia, Lydia Guzman, Joseph Miller, Sophia Masewicz, Wanda Clark, Christine Muldoon, Sandy

Freidenberger, Kristen Wood, Evelyn Ortega, Samara Williams, Barbara Heumann, Monica Avina; **PLUS** one or more of the following terms: Judy, Jaramillo, Judy Jaramillo, principal of Hanson, Hanson PreK-8, Hanson Elementary, Hanson.

RFP No. 4 (as to Plaintiff only): Susan Chandler (or Sue Chandler) **AND** one or more of the following terms: Judy, Jaramillo, Judy Jaramillo, principal of Hanson; **PLUS** one or more of the following terms: performance, warning, discipline, administrative leave, termination.

RFP No. 5: Susan Chandler (or Sue Chandler), Lynn Heintzman, Janelle Sueltz, Phil Bedford, John Albright, Lydia Guzman, Joseph Miller, and/or Monica Avina; **AND** one or more of the following terms: Judy, Jaramillo, Judy Jaramillo, principal of Hanson; **PLUS** one or more of the following terms: Hanson PreK-8, Hanson Elementary, Hanson.

RFP No. 6: Susan Chandler (or Sue Chandler) **AND** one or more of the following terms: Hanson, Hanson PreK-8, Hanson Elementary; **PLUS** one or more of the following terms: school calendar year, continuous year, calendar committee, district calendar, 2009-2010 school calendar, school calendar.

RFP No. 7: Susan Chandler (or Sue Chandler) **AND** one or more of the following terms: Hanson, Hanson PreK-8, Hanson Elementary; **PLUS** one or more of the following terms: ELL, ELL Design Team Application, ELL Design Team, ELA, English Language Acquisition, ESOL, ESL, CADI, English Language Development, ELD, push-in model, native language, second language, spanish speakers, spanish, bilingual education model, acquiring english, bilingual english instruction.

These searches may include “wild card spelling” searches for names and terms. The search must be completed and produced to Defendant for privilege review on or before **February 9, 2011**. Defendant must produce all non-privileged documents and a corresponding privilege log listing all

withholdings and redactions on or before **February 21, 2011**.

SO ORDERED.

Dated this 2nd day of February, 2011, at Denver, Colorado.

BY THE COURT:

A handwritten signature in black ink that reads "Michael E. Hegarty". The signature is written in a cursive style with a large initial 'M' and 'H'.

Michael E. Hegarty  
United States Magistrate Judge