

BIEDIGER, ET AL. V. QUINNIAC UNIVERSITY
CIVIL ACTION NO. 3:09-CV-621 (SRU)

DEFENDANT'S TRIAL EXHIBITS:

The following is a preliminary list of exhibits that the Defendant intends to offer at trial. Defendant expressly reserves the right to supplement or modify this list.

Exhibit #	Date	Description	Bates-Number	Objection
AA	7/22/09	Letter to C. Martin confirming women's cross country roster number for '09-'10	D 0942	
AB	9/4/09	Women's cross country roster '09-'10	D 9148 - 49	
AC	2009-10	Women's cross country schedule '09-'10	D 6383	
AD	Various dates	Women's cross country results '09-'10	D 0403-55; 6419-6422; 14432-34	
AE	Undated	Martin spreadsheet showing participation in women's cross country meets for '09-'10	D 13631	
AF	Undated	Chart of indoor track events vs. outdoor track events for '09-'10	Un-stamped	
A	11/16/09	Change in status form to add students to cross country team in '09-'10	D 8911	
AGH	12/5/09-3/13/09	Women's indoor track schedule for '09-'10	D 8798	
AI	Various dates	Women's indoor track results '09-'10	D 0823-57; 8799-57; 14241-80; 14429-31	
AJ	Undated	Martin spreadsheet showing participation in women's indoor track meets for '09-'10	D 13632	
AK	3/7/10	Press releases re women who qualified for ECAC championship in indoor track	D 11354-55	
AL	7/22/09	Letter to C. Martin confirming women's indoor track roster number for '09-'10	D 0943	
AM	12/2/09	Squad list for women's indoor track team for '09-'10	D 9082 - 9084	
AN	1/21/10	Change in status forms for women's indoor track team in '09-'10	D 8910	

Exhibit #	Date	Description	Bates-Number	Objection
AO		Women's outdoor track schedule for '09-'10	D 13635	
AP	Various dates	Women's outdoor track results '09-'10	D 12246-77; 13192-13204; 13598-13637; 14281-14364; 14366-14428	
AQ	5/16/10	Press release re women who qualified for ECAC championship in outdoor track	D 14436- 39	
AR	Undated	Martin spreadsheet showing participation in women's outdoor track meets for '09-'10	D 13633 - 34	
AS	3/29/10	E-mail correspondence from Robin to Flynn et al. re C. Donnelly	D 13311 - 12	
AT	7/22/09	Letter to C. Martin confirming women's outdoor track roster number for '09-'10	D 0944	
AU	3/15/10	Squad list for women's outdoor track team for '09-'10	D 13257 - 13259	
AV	7/31/09	E-mail re budgets for men's cross country, women's cross country, women's indoor track and women's outdoor track for '09-'10 and attachments	D 1691 - 1698	
AW	5/13/10	Men's cross country budget and expenses for '09-'10	D 13930- 40	
AX	5/13/10	Women's cross country budget and expenses for '09-'10	D 14169 - 80	
AY	5/13/10	Women's indoor track budget and expenses for '09-'10	D 14159 - 68	
AZ	5/13/10	Women's outdoor track budget and expenses for '09-'10	D 14210 - 17	
BA	7/22/09	Letter to C. Martin confirming men's cross country roster number for '09-'10	D 0941	
BB	9/3/09	Squad list for men's cross country team for '09-'10	D 9165 - 66	
BC	Undated	Martin spreadsheet showing participation in men's cross country meets for '09-'10	D 14365	
BD	2009-10	Men's cross country schedule '09-'10	D 4089	

Exhibit #	Date	Description	Bates-Number	Objection
BE	Various dates	Men's cross country results '09-'10	D 0456-87; 501-03; 4097-4108; 4121	
BF	5/10/10	E-mail correspondence between C. Martin and M. Thompson re roster size for '10-'11	D 13625 - 13628	
	6/2/09	Roster number chart for '09-'10 – National Averages vs. Current Plan	D9169 - 70	
	7/7/09	Roster number chart for '09-'10 – National Averages vs. Current Plan	D 9171	
	7/24/09	2009-2010 Roster Comparisons – Final vs. Preliminary Plan vs. NCAA Avg. Squad Size	D 9173	
	11/3/09	2009-10 Roster Comparisons – Plan vs. Actual	D 9174	
	12/10/09	2009-10 Roster Comparisons – Plan vs. Actual	D 9175	
	1/20/10	2009-10 Roster Comparisons – Plan vs. Actual	D 9177	
		Summary of roster sizes on first date of competition and last date of competition for '09-'10	Unstamped	
	Undated	IPED – Enrollment Numbers for 2009-2010	D13186	
	7/22/09	Letters to coaches re roster sizes for '09-'10 (signed letters for each coach and unsigned for Sparks and Fairchild)	D 0937 -953	
	Undated	Preliminary roster number chart for '10-'11	D 15797	
	Undated	Final roster number chart for '10-'11	D 15857	
	7/21/09	Email correspondence from Thompson to McDonald re: Roster Memo to Coaches and attached roster plan – National Averages vs. Current Plan	D 11324 - 25	
	9/1/09	Email correspondence from Thompson to McDonald re: Final vs. Preliminary Roster Plan and attached Final vs. Preliminary Roster Plan	D 11322 - 23	
	9/21/09	Email correspondence from Thompson to Flynn re: Roster #'s thus far	D 11246 - 47	

Exhibit #	Date	Description	Bates-Number	Objection
	10/19/09	Email correspondence from Thompson to Flynn re: Roster Changes	D 11259	
	11/12/09	Email correspondence from Thompson to McDonald et al. re: Approvals to changes in rosters	D 11264	
	5/3/10	Email correspondence from Thompson to Head Coaches re: Coaches Input On Roster Numbers for 2010-11	D 13325	
	7/28/09	Email correspondence from Thompson to Powers re: Input on roster number	D 11201 -03	
	7/24/09	Email correspondence from Thompson to Sacca re: WBB Roster Numbers	D 11186	
	7/28/09	Email correspondence from Thompson to Flynn Sacca re: WBB Roster Numbers	D 11204	
	9/1/09	Email correspondence from Thompson to Sacca re: WBB Roster Numbers	D 11223	
	7/28/09	Email correspondence from Thompson to Seeley et al. re: Roster Number	D 11191 -92	
	7/24/09	Email correspondence from Thompson to Caro et al. re: Input on roster numbers	D 11185	
	6/16/09	Email correspondence from Thompson to Clarke re: Meeting	D 11180	
	7/24/09	Email correspondence from Thompson to Clarke re: Input on roster numbers	D 11187 - 88	
	7/31/09	Email correspondence from Thompson to Fairchild re: Input on roster numbers	D 11207 - 10	
	8/11/09	Email correspondence from Thompson to Fairchild re: Input on roster numbers	D 11216 - 17	
	8/26/09	Email correspondence from Thompson to Fairchild re: Meeting	D 11220	
	8/6/09	Email correspondence from Thompson to Sparks et al. re: Roster Number	D 11212 - 13	

Exhibit #	Date	Description	Bates-Number	Objection
	9/1/09	Email correspondence from Thompson to Moore re: Checking In re roster number	D 11226	
	9/1/09	Email correspondence from Thompson to McDonald et al re: MBB Roster Number	D 11221 - 22	
	7/28/09	Email correspondence from Thompson to Pecknold et al. re: Input on roster numbers	D 11198 - 11200	
	8/1/09	Email correspondence from Thompson to Pecknold et al re: Roster Management	D 11214 - 15	
	9/1/09	Email correspondence from Thompson to Pecknold et al re: MIH Roster Number	D 11225	
	9/14/09	Email correspondence from Thompson to Pecknold et al re: Roster letter	D 11244	
	7/28/09	Email correspondence from Thompson to Fekete et al. re: Men's Lacrosse Roster Number	D 11205	
	3/3/10	Email correspondence from Thompson to Main et al. re: Roster Adjustment (addition) – Field Hockey	D 11174	
	1/19/10	Email correspondence from Thompson to Fekete et al. re: Roster Adjustments for M-LAX	D 11279-80	
	1/19/10	Email correspondence from Thompson to Fekete et al. re: Roster Add/Delete	D 11281- 82	
	1/25/10	Email correspondence from Thompson to Fekete re: Roster Mgmt	D11310-11	
	1/27/10	Email correspondence from Thompson to Fekete et al. re: Roster Mgmt	D 11308-09	
	2/9/10	Email correspondence from Thompson to Fekete et al. re: Roster Change	D 11316	
	2/12/10	Email correspondence from Thompson to Fekete et al. re: Storm Stockstill	D 15153-54	
	4/26/10	Email correspondence from Thompson to Fekete re: Roster Adjustment	D 13281	

Exhibit #	Date	Description	Bates-Number	Objection
	11/3/09	Email correspondence from Thompson to Flynn re: Update change in status log	D 11267	
	9/11/09	Email correspondence from Thompson to McDonald re: Inquires related to roster numbers	D 11228 - 29	
	10/28/09	Email correspondence from Sparks to Thompson et al. re: Roster Changes	D 11841	
	11/19/09	Email correspondence from McDonald to Thompson et al. re: Future of QU volleyball Program	D 11862	
	1/27/10	Email correspondence from Thompson to Sparks et al. re: Roster Numbers	D 11302 - 07	
	3/29/10	Email correspondence from Sparks to Flynn re: Change of Status Form	D 13310	
	3/26/10	Email correspondence from Thompson to Clark et al. re: Wsoccer Player Addition	D 13296	
	9/14/09	Email correspondence from Thompson to McDonald et al. re: Important wlax roster questions	D 11232 - 36	
	9/14/09	Email correspondence from Thompson to McDonald et al. re: Important wlax roster questions	D 11239 - 43	
	1/21/10	Email correspondence from Thompson to Caro et al. re: WLA Change in status	D 11291 - 92	
	1/25/10	Email correspondence from Thompson to Caro et al. re: wlax roster change	D 11297	
	3/19/10	Email correspondence from Caro to Flynn et al. re: wlax Status Change	D 13299	
	9/18/09	Email Correspondence from Thompson to Flynn et al. re: Softball Roster	D 11245	
	10/19/09	Email Correspondence from Thompson to Flynn et al. re: Please Add Kortney Kesses to Roster	D 11256-58	
	4/7/10	Email Correspondence from Seeley to Thompson et al.	D 13285 - 86	
	5/3/10	Email correspondence from Seeley to Thompson re: Coaches Input On Roster Numbers for 2010-11	D 013316	

Exhibit #	Date	Description	Bates-Number	Objection
	2/16/10	Email correspondence from Robin to Flynn re: Men's Cross Country	D 15195-97	
	1/27/10	Email Correspondence from Thompson to McDonald et al. re: Addition of a Transfer Student	D 11298-11301	
	3/1/10	Email Correspondence from Thompson to Da Costa re: Tryout players	D 11173	
	3/30/10	Email Correspondence from Thompson to Da Costa et al. re: Change of Status	D 13306 - 09	
	10/2/09	Email Correspondence from Thompson to Pecknold et al. re: 30 roster	D 11250	
	11/16/09	Email Correspondence from Pecknold to McDonald et al. re: Roster Management Question	D 11274	
	11/19/09	Email Correspondence from Thompson to Flynn et al. re: Roster Management Question	D 11276-77	
	12/18/09	Email Correspondence from McDonald to Thompson re: Tevin Baskin Appeal	D 15159	
	1/19/10	Email Correspondence from Thompson to Moore re: Men's hoop roster management	D 11278	
	1/19/10	Email Correspondence from McDonald to Thompson re: Eric Coggins	D 13298	
	3/31/10	Email correspondence from Thompson to Sacca re: WBB Roster 10-11	D 013293	
	4/7/10	Email correspondence from Thompson to Powers et al. re: Roster QU Competitive Cheer	D013289	
	4/26/10	Email correspondence from Thompson to Powers et al. re: Roster Meeting	D 013284	
	4/26/10	Email correspondence from Thompson to Powers re: Roster Meeting	D 013305	
	5/4/10	Email correspondence from Thompson to Clarke re: Coaches Input on Roster Numbers for 2010-22	D013323 -24	

Exhibit #	Date	Description	Bates-Number	Objection
	4/26/10	Email correspondence from Thompson to Caro re: Roster numbers	D 013303 - 04	
	5/3/10	Email correspondence from Thompson to Caro re: Coaches Input On Roster Numbers for 2010-11	D 013329 – 31	
	4/7/10	Email correspondence from Thompson to Robin re: Roster	D 013287 - 88	
	5/10/10	Email correspondence from Thompson to Robin re: Roster	D 15047 - 49	
	5/5/10	Email correspondence from Thompson to Sparks re: Coaches Input On Roster Numbers for 2010-11	D 15044 - 46	
	5/7/10	Email correspondence from Moore to Thompson et al. re: Coaches Input On Roster Numbers for 2010-11	D 15039	
	4/1/10	Email correspondence from Thompson to McDonald re: 30	D 013291 -92	
	4/7/10	Email correspondence from Thompson to Pecknold et al. re: 30	D 013290	
	Various dates	Squad lists for beginning of '09-'10	D 9130-68; 12231-35	
	Various dates	Squad lists for end of '09-'10	D 15073 - 15125	
	2/15/10 5/26/10	Change in status lists for '09-'10	D 9070-74; D 15071-72	
	Various dates	Change in status forms for '09-'10	D 8858 – 44; D 8966; D 15127- 15148	
		NCAA Manual for '09-'10		
	2008-09	NCAA Participation Report for '09-'10	D 15581-15791	
	2008	NCAA Gender Equity Manual	Pl. Ex. 25 From PI Hearing	
	5/20/10	List of scholarships for '09-'10	D 15062 - 15070	
	Undated	Season of competition used list for '09-'10	D 15050-61	
	Undated	Summary of roster sizes on first date of competition and last date of competition for '09-'10, including summary of athletes who competed and athletes who were on scholarship or competed	Unstamped	

Exhibit #	Date	Description	Bates-Number	Objection
	Various dates	Email correspondence to or from T. Flynn regarding additions and deletions from teams in 2009-2010	D 15238 D 15213 D 15214 -17 D 15178 D 15218 D 15179 -80 D 15181 D 15160 D 15161 D 15182 D 15219 D 15183 D 15172 -73 D 15220 D 15222-23 D 15184 D 15185 -86 D 15187-88 D 15239 D 15189 -90 D 15193-94 D 15224-26 D15198-208 D15227 D 15209 D 15228- 29 D 15210 D 15149-50 D 15234-35	

Exhibit #	Date	Description	Bates-Number	Objection
	Various dates	End of year statistics for all sports	WS - D 559, 561, 562, 859, 11343, 12387, 13273, 13212, 13423-24 MS – D564, 11370, 11359, 13208, 13420, 13421, 13422	
		NFHS participation survey		
		Summary of events and participants in women's indoor and outdoor track and field meets and cross country meets for 2009-2010		
		Email correspondence to or from J. McDonald regarding additions and deletions from teams in 2009-2010	D 15162-63 D 15164-65 D 15166-68 D 15169-71 D15155-56 D 15230-33 D 15236-37 D 15424-27	
	2009-10	Schedule for Competitive Cheer '09-'10	Plaintiffs' Dep. Exhibit P502	
	2009	Results from Competitive Cheer competitions '09-'10	D 6219 – 6233; D 12305 - 12359	
	5/13/10	Expenditure ledger information for Competitive Cheer for '09-'10	D 14218-240	
	Undated	NCSTA rules / judging criteria	D 868 - 892	
		Video of Competitive Cheer competition at Kennesaw Meet / edited version of video	D 15856	

Exhibit #	Date	Description	Bates-Number	Objection
	Various dates	Articles re Competitive Cheer team	D 125 -26; 127 -28; D 6233A; 6233B, 6233C, 6233E, 6233F - 6233G; 13213 – 14, 13216 – 17, 11385 – 86	
		NCSTA by-laws, revised rules	D 15827-51	
		Information form M. Powers sent prospective athletes	D 13260	
	2009-10	Athletics Department Staff Handbook	D 1335 - 1411	

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