

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

<b>LAURA J. LAMBERT</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CAUSE NO. 1:10-cv-0919-JMS-TAB</b>
	)	
<b>HUSSEY-MAYFIELD MEMORIAL</b>	)	
<b>PUBLIC LIBRARY,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF’S PRELIMINARY EXHIBIT LIST**

\_\_\_\_\_ Comes now the Plaintiff, Laura J. Lambert, by counsel, and pursuant to the Case Management Plan approved by the Court, hereby respectfully provides the following preliminary list of exhibits which may be used in the trial of the Cause. Plaintiff reserves the right to correct, clarify, supplement, or otherwise amend the following list of potential exhibits for any appropriate reason.

1. A complete copy of Plaintiff’s personnel file, including but not limited to, performance evaluations, copies of any disciplinary matters/actions, copies of including counseling, copies of awards and the like,
2. A complete copy of Plaintiff’s pay records, compensation records, time records, daily logs, time sheets, time cards, earning statements, payroll records, W-2 form, W-4 form, Federal and State tax returns, pay stubs and any timekeeping records of any type and nature of Plaintiff;
3. A complete copy of Susan Jenkins’ personnel file, including but not limited to, performance evaluations, copies of any disciplinary matters/actions, including counseling, requests for accommodations and pay records,
4. A complete copy of Richard Deuschle’s personnel file, including but not limited to, performance evaluations, copies of any disciplinary matters/actions, including counseling and pay records,

5. A complete copy of all similarly situated individuals' personnel file, including but not limited to, performance evaluations, copies of any disciplinary matters/actions, including counseling,
6. Any and all documentation, correspondence, emails, electronic media, memoranda, notes, digital audio, digital video, audiotapes, videotapes, and correspondence or whatever type and nature by and between Defendant and/or its employees in which Plaintiff was the subject matter,
7. Any and all documentation, emails, electronic media, memoranda, notes, digital audio, digital video, audiotapes, videotapes, and correspondence of whatever type or nature by and between Plaintiff and Defendant and/or its employees,
8. Any and all employee or other policies and/or procedures manuals or handbooks of whatever type or nature, including any amendments or revisions thereto in effect during the time of Plaintiff's employ;
9. Any and all documentation, emails, electronic media, memoranda, notes, digital audio, digital video, audiotapes, videotapes, notes, correspondence and the like taken or created during the investigation which led to the termination of Plaintiff or any request for reasonable accommodation made by Plaintiff,
10. Any documentation of whatever type or nature which details or depicts Plaintiff's job duties/job description,
11. Any and all documentation, emails, electronic media, memoranda, notes, digital audio, digital video, audiotapes, videotapes, correspondence and the like taken or created during the investigation which led to the termination of other persons for the same reasons as Plaintiff or the grant of reasonable accommodations made on account of any person's disability,
12. Any and all documentation, emails, electronic media, memoranda, notes, digital audio, digital video, audiotapes, videotapes, notes, correspondence and the like taken or created during the investigation which led to the decision to retain Susan Jenkins,
13. Any and all prior complaints made to Defendant of ADA discrimination, including but not limited to any and all EEOC filings and copies of investigations;
14. Complete copies of Plaintiff's medical records, including any bill or invoice for any care provided or prescription ordered, by any health care provider for Plaintiff for any care provided to Plaintiff,

15. All pleadings in this action,
16. All documents referenced, discussed, or mentioned during any deposition in this matter,
17. All documents provided during the discovery process,
18. All documents relating to Plaintiff's employment with Defendant,
19. All documents relating to Susan Jenkins' and Richard Deuschle's employment with Defendant,
20. All documents used, reviewed and/or relied upon by Defendant in reaching its decision concerning Plaintiff's request for accommodation,
21. The employment and personnel files and records of any individual who replaced Plaintiff and/or assumed her duties and responsibilities upon her separation,
22. All documents showing or identifying each person hired, rehired, and/or recalled by Defendant after the date of Plaintiff's termination,
23. All documents regarding the policies under which Plaintiff was terminated,
24. All documents regarding Defendant's employment practices, policies, and procedures applicable to Plaintiff and her claims in this matter,
25. All documents regarding Defendant's discrimination practices, policies, and procedures applicable to Plaintiff and her claims in this matter,
26. All documents regarding adverse employment actions taken by Defendant against Plaintiff, Tom McColley, Stanley Kindred, and/or Donald Brown,
27. All documents relating to Plaintiff's lost wages and benefits,
28. All documents relating to Plaintiff's damages incurred as a result of Defendant's actions,
29. All documents identified by Defendant on its exhibit lists,
30. All documents identified by Plaintiff and Defendant in their initial disclosures,
31. All documents sent or given by Defendant to Plaintiff or received by Defendant from Plaintiff during the discovery process,

32. All statements, affidavits, or other documents obtained by Plaintiff or Defendant from non-parties,
33. All documents sent or given by the parties to the EEOC or received by the parties from the EEOC,
34. All organizational charts, personnel charts, or other documents showing the identities, titles, and/or responsibilities of each person employed by Defendant,
35. All exhibits relied on or used at any deposition taken in this action,
36. Any exhibit necessary for purposes of impeachment or rebuttal; and,
38. Any document which may be used to refresh the recollections of any witness;

Plaintiff reserves the right to correct, clarify, supplement, or otherwise amend the following list of potential witnesses for any appropriate reason.

Respectfully submitted,

/s/ Richard W. McMinn  
Richard W. McMinn, Attorney No. 13715-49  
One of the Attorneys for Plaintiff

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was electronically filed this 16<sup>th</sup> day of December, 2010. Parties may access this filing through the Court's electronic filing system. Notice of this filing will be sent to the following counsel of record by operation of the Court's system:

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/s/ Richard W. McMinn  
\_\_\_\_\_  
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