

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

LAURA J. LAMBERT,

Plaintiff,

v.

**HUSSEY-MAYFIELD MEMORIAL
PUBLIC LIBRARY,**

Defendant.

Cause No. 1:10-cv-0919-JMS-TAB

DEFENDANT'S PRELIMINARY EXHIBIT LIST

Defendant Hussey-Mayfield Memorial Public Library ("the Library") provides the following preliminary list of exhibits it may introduce at a trial of this matter:

1. Documents from Plaintiff's personnel file.
2. Library Employee Handbook.
3. Library Organization Chart dated November 17, 2008.
4. Library Employee list dated November 17, 2008.
5. Job description for the Circulation Services Library Assistant II position.
6. Various e-mails among Plaintiff, Martha Catt, Shawn Parker, Mary Rueff, and Phyllis Robinson pertaining in various ways to Plaintiff's leave time between October 1, 2008, and November 18, 2008.
7. Doctors' notes Plaintiff provided dated October 27, 2008; October 31, 2008; and November 7, 2008.
8. Correspondence from Martha Catt to Plaintiff dated October 16, 2008, October 27, 2008, and November 19, 2008.
9. Correspondence dated December 17, 2008, notifying the Library of the denial of Plaintiff's claims for short-term disability benefits.

10. Documentation pertaining to Plaintiff's accrued vacation and PTO benefits.
11. Documentation pertaining to Susan Jenkins' employment with the Library and steps taken pertinent to her health problems.
12. Documentation pertaining to Rick Dueschle's PERF contributions and vacation pay.
13. All documents listed on Plaintiff's Preliminary and Final Witness Lists.
14. All documents identified through discovery.
15. All documents necessary for rebuttal or impeachment.

The Library reserves the right to supplement this list as discovery continues.

Respectfully submitted,

/ s / Jane Ann Himsel

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*Attorneys for Defendant Hussey-Mayfield
Memorial Public Library*

CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of January 2011, served a copy of the foregoing *Defendant's Preliminary Exhibit List* electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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/s/ Jane Ann Himsel

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