

1 I, JAMES ENGLERT, do hereby certify that  
2 I have read the above and foregoing deposition and  
3 that the same is a true and accurate transcription of  
4 my testimony, except for attached amendments, if any.

5 Amendments attached ( ) Yes (X) No


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\_\_\_\_\_  
JAMES ENGLERT

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13 The signature above of JAMES ENGLERT was  
14 subscribed and sworn to before me in the county of  
15 Arapahoe, state of Colorado,  
16 this 3 day of August, 2015.

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\_\_\_\_\_  
Notary public  
My Commission expires:

**SHALEE BYERRUM**  
**NOTARY PUBLIC**  
**STATE OF COLORADO**  
**Notary ID 20024016018**  
**My Commission Expires 04/16/2019**

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Michael Davis, et al., 7/1/15 (am)



Received By:  
Hunter + Geist  
AUG 11 2015

Office of the County Attorney

5334 South Prince Street  
Littleton, Colorado 80120-1136  
Phone: 303-795-4639  
Fax: 303-738-7836  
[www.co.arapahoe.co.us](http://www.co.arapahoe.co.us)  
[attorney@co.arapahoe.co.us](mailto:attorney@co.arapahoe.co.us)

Hunter + Geist, Inc.  
Natasha Ohaion  
1900 Grant St., Ste. #1025  
Denver, CO 80203

RONALD A. CARL  
County Attorney

In Re the Arbitration of: Michael and Desiree Davis and Littleton Public Schools  
Signature page for James Englert transcript

Dear Ms. Ohaion:

Please find enclosed the original signature page for the deposition transcript of James Englert dated August 3, 2015.

If you have any questions, please contact our office.

Sincerely,

Erin Powers  
Assistant County Attorney

Encl. Original signature page

DEC 31 2015

1 I, GUY M. GRACE, JR., do hereby certify  
2 that I have read the above and foregoing deposition  
3 and that the same is a true and accurate transcription  
4 of my testimony, except for attached amendments, if  
5 any.

6 Amendments attached ( ) Yes ( ) No

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*G.M. Grace, Jr.*  
GUY M. GRACE, JR.

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The signature above of GUY GRACE was  
subscribed and sworn to before me in the county of  
Arapahoe, state of Colorado,  
this 21st day of December, 2015.

*Jordan M. Summers*

Notary Public  
My Commission expires: Aug 28, 2017









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DEC 31 2016

Bobbe Koch <bkoch@huntergeist.com>

---

## Fwd: Davis v. LPS - Amendment Sheet for Guy Grace deposition

---

**Bobbe Koch** <scheduling@huntergeist.com>  
Draft To: Kathy Azcuenaga <kathy@huntergeist.com>

Mon, Jan 4, 2016 at 1:26 PM

From: **Brenda Westra** <bwestra@semplelaw.com>  
Date: Thu, Dec 31, 2015 at 2:55 PM  
Subject: Davis v. LPS - Amendment Sheet for Guy Grace deposition  
To: Kathy Azcuenaga <kathy@huntergeist.com>

Hi Kathy! Attached please find the fully executed Amendment Sheet of Guy Grace in the above matter.  
Thanks and Happy New Year!

Brenda Westra, Paralegal

Semple, Farrington & Everall, P.C.

1120 Lincoln Street, Suite 1308

Denver, CO 80203

303.595.0941

303.861.9608 (fax)

bwestra@semplelaw.com



# Hunter + Geist, Inc.

Your Partner in Making the Record

December 21, 2015

Michael J. Roche, Esq.  
Lathrop & Gage, LLP  
950 17<sup>th</sup> Street  
Suite 2400  
Denver, Colorado 80202

In Re the Arbitration of: Michael Davis, et al. and Littleton Public School District  
Deposition(s) of: Nathan Thompson (10.12.15), Kevin Kolasa (10.14.15) and  
Darrell Meredith (06.30.15)

Dear Mr. Roche:

We have received by e-mail the attached file(s) containing the signature page(s) and/or amendment page(s) for the above-named deposition(s), which we are forwarding to you to place with the original transcript(s).

Sincerely,

Karen Hardy  
Hunter + Geist, Inc.  
Court Reporting, Legal Videography, and Videoconferencing  
[filing@huntergeist.com](mailto:filing@huntergeist.com) | [www.huntergeist.com](http://www.huntergeist.com)

**"Your Partner in Making the Record"**

1900 Grant Street, Suite 1025, Denver, Colorado 80203  
[303-832-5966](tel:303-832-5966) | [800-525-8490](tel:800-525-8490)

c: Steve Everall, Esq.

**303.832.5966**  
**800.525.8490**

1900 Grant Street  
Suite 1025  
Denver, CO 80203

■ [www.huntergeist.com](http://www.huntergeist.com)  
■ [scheduling@huntergeist.com](mailto:scheduling@huntergeist.com)

Received By:  
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1 I, KEVIN KOLASA, do hereby certify that I  
2 have read the above and foregoing deposition and that  
3 the same is a true and accurate transcription of my  
4 testimony, except for attached amendments, if any.

5 Amendments attached (X) Yes ( ) No

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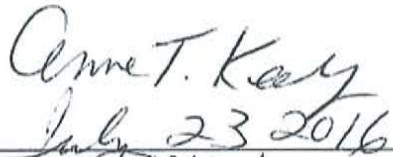
  
\_\_\_\_\_  
KEVIN KOLASA

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13 The signature above of KEVIN KOLASA was  
14 subscribed and sworn to before me in the county of  
15 Arapahoe, state of Colorado,  
16 this 4 day of December, 2015.

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ANNE T KEELY  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20124046880  
MY COMMISSION EXPIRES JULY 23, 2016

  
\_\_\_\_\_  
Notary public  
My Commission expires:

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25 Michael Davis, 10/14/15 (am)



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Received By:  
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DEC 17 2015

## AMENDMENTS TO DEPOSITION

The deponent, Kevin Kolasa, wishes to make the following changes in the deposition:

Page	Line	Should Read	Reason
7	22	Replace "2013" with "2014"	Error
8	6	Change "uh-uh" to yes"	Clarification
13	1	I received an email dated April 5, 2012 suggesting that Darrell Meredith, Steve Sisler, or I attend the Danger Assessment training. Since Steve and Darrell had already gone, I went.	Reviewed email dated 5/5/2012
17	10	Nate used the Danger Assessment as a Preezi presentation (See Exhibit 46)	More complete answer
42	42	Strike entire sentence. Change to the following: In dark handwriting, "All of the teachers are out to fucking get me." In light handwriting, "they [the students] are idiots, they deserve it."	Clarification
44	24	Add, I remember speaking to Amanda Crosby about Karl in his junior year.	Addition
51	22	Change " I don't know" to "yes".	Subsequent recall
58	11	Strike "I believe so, yes." Change to "No, it was during a second telephone conversation I had with Mrs. Pierson probably 9/5 or 9/6"	Error; Subsequent recall
58	16-22	Strike entire answer. Replace with "I spoke with Natalie about the threat assessment at some point, between my two telephone conversations with Mrs. Pierson."	Error; Subsequent recall
59	14	Strike "correct". Change to "this conversation with Natalie occurred between my two conversations with Mrs. Pierson."	Error; Subsequent recall
78	19	Strike entire answer. Change to "No, out of six semesters half of them Karl had a GPA below 3.0."	Checked his records
82	6	Add the following, "The staff handbook provides that teachers are expected to telephone parents of students receiving an "F" grade. Counselors are to telephone parents of students receiving two (2) or more failure grades." (Refer to exhibit 3)	More complete answer





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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
85	25	Add, "Karl was taking two AP courses which suggested to me that he may be struggling more with the workload than him becoming apathetic about school"	More complete answer
120	13	Add the following: "But we knew that Karl had not engaged in any fights or otherwise displayed physical aggression at AHS to solve his problems which was important to our threat assessment."	More complete answer
143	16-17	Strike, "that he was able to take that criticism of Karl." Change to "Karl was able to accept my criticism of him."	Clarification
158	25	Add, "I also believe Karen Gerlich knew." (SP)	Subsequent Recall
176	12	Add, "we also discussed the details of the threat itself so Karl and Tracy could have a conversation regarding the incident."	Subsequent Recall

Subscribed and sworn to before me

this 4 day of December, 20 15

Signature of Deponent

Notary Public

My Commission Expires: July 23, 2016

ANNE T KEELY  
 NOTARY PUBLIC  
 STATE OF COLORADO  
 NOTARY ID 20124046880  
 MY COMMISSION EXPIRES JULY 23, 2016



Received By:  
Hunter + Geist  
DEC 17 2015

Bobbe Koch <bkoch@huntergeist.com>

---

## Arbitration of Davis and Littleton Public School District; JAG No. 2015-0665A

1 message

---

Sally Thurston <sthurston@semplelaw.com>

Thu, Dec 17, 2015 at 3:00 PM

To: "scheduling@huntergeist.com" <scheduling@huntergeist.com>

Cc: Steve Everall <severall@semplelaw.com>

Attached please find correspondence from Stephen G. Everall, Esq. of this firm, as well as the deposition signature pages and correction sheets for Nathan Thompson and Kevin Kolasa. A signature page only is attached for Darrell Meredith.

If you have any questions, please contact us.

Sally Thurston

Legal Assistant to Martin Semple,

Stephen Everall and M. Brent Case

Semple, Farrington & Everall, P.C.

1120 Lincoln Street, Suite 1308

Denver, CO 80203

303.595.0941

sthurston@semplelaw.com

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**4 attachments**



**T Hunter and Geist 201512217 enc sig pages and change sheets.docx.pdf**

38K



**Nathan Thompson Sig Page and Corrections 201251211.pdf**

168K



**Kevin Kolasa signature page and corrections 20151204.pdf**

193K



**Darrell Meredith signature page 20151120.pdf**

56K

Received By:  
Hunter + Geist  
DEC 17 2015





1 I, VICTORIA D. LOMBARDI, do hereby  
 2 certify that I have read the above and foregoing  
 3 deposition and that the same is a true and accurate  
 4 transcription of my testimony, except for attached  
 5 amendments, if any.

6 Amendments attached (X) Yes ( ) No

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*Victoria D. Lombardi*  
 \_\_\_\_\_  
 VICTORIA D. LOMBARDI

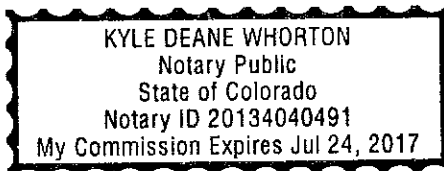
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The signature above of  
 14 VICTORIA D. LOMBARDI was subscribed and sworn to  
 15 before me in the county of Anapahoe, state of  
 16 Colorado, this 23<sup>rd</sup> day of  
 17 July, 2015.

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*Kyle Deane Whorton*  
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 Notary public  
 My Commission expires:

22  
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25 Michael Davis, et al. 7/2/15 (am)



1 I, RODNEY E. MAULER, do hereby certify  
 2 that I have read the above and foregoing deposition  
 3 and that the same is a true and accurate transcription  
 4 of my testimony, except for attached amendments, if  
 5 any.

6 Amendments attached ( ) Yes ( ) No

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*Rodney E. Mauler*  
 RODNEY E. MAULER

13 The signature above of RODNEY E. MAULER  
 14 was subscribed and sworn to before me in the county of  
 15 Arapahoe, state of Colorado,  
 16 this 19<sup>th</sup> day of August, 2015.

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*Janelle R. Weems*  
 Notary public  
 My Commission expires:

JANELLE R WEEMS  
 NOTARY PUBLIC  
 STATE OF COLORADO  
 NOTARY ID 20114039483  
 COMMISSION EXPIRES JUN. 29, 2019

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25 Michael Davis, et al. 7/15/15 (am)



# Hunter + Geist, Inc.

Your Partner in Making the Record

December 21, 2015

Michael J. Roche, Esq.  
Lathrop & Gage, LLP  
950 17<sup>th</sup> Street  
Suite 2400  
Denver, Colorado 80202

In Re the Arbitration of: Michael Davis, et al. and Littleton Public School District  
Deposition(s) of: Nathan Thompson (10.12.15), Kevin Kolasa (10.14.15) and  
Darrell Meredith (06.30.15)

Dear Mr. Roche:

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Sincerely,

Karen Hardy  
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Court Reporting, Legal Videography, and Videoconferencing  
[filing@huntergeist.com](mailto:filing@huntergeist.com) | [www.huntergeist.com](http://www.huntergeist.com)

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1900 Grant Street, Suite 1025, Denver, Colorado 80203  
[303-832-5966](tel:303-832-5966) | [800-525-8490](tel:800-525-8490)

c: Steve Overall, Esq.

**303.832.5966**  
**800.525.8490**

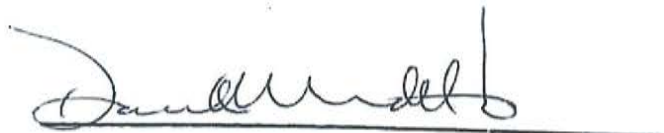
1900 Grant Street  
Suite 1025  
Denver, CO 80203

■ [www.huntergeist.com](http://www.huntergeist.com)  
■ [scheduling@huntergeist.com](mailto:scheduling@huntergeist.com)



I, DARRELL MEREDITH, do hereby certify that I have read the above and foregoing deposition and that the same is a true and accurate transcription of my testimony, except for attached amendments, if any.

Amendments attached  Yes ( ) No



DARRELL MEREDITH

The signature above of DARRELL MEREDITH was subscribed and sworn to before me in the county of Arapahoe, state of Colorado, this 20 day of November, 2015.



Notary public

My Commission expires:

CANDACE K PUTNAM  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 19904017092  
MY COMMISSION EXPIRES APRIL 21, 2016

Michael Davis, et al. 6/30/15 (am)



Received By:  
Hunter + Geist  
DEC 17 2015

Bobbe Koch <bkoch@huntergeist.com>

---

## Arbitration of Davis and Littleton Public School District; JAG No. 2015-0665A

1 message

---

Sally Thurston <sthurston@semplelaw.com>

Thu, Dec 17, 2015 at 3:00 PM

To: "scheduling@huntergeist.com" <scheduling@huntergeist.com>

Cc: Steve Everall <severall@semplelaw.com>

Attached please find correspondence from Stephen G. Everall, Esq. of this firm, as well as the deposition signature pages and correction sheets for Nathan Thompson and Kevin Kolasa. A signature page only is attached for Darrell Meredith.

If you have any questions, please contact us.

Sally Thurston

Legal Assistant to Martin Semple,

Stephen Everall and M. Brent Case

Semple, Farrington & Everall, P.C.

1120 Lincoln Street, Suite 1308

Denver, CO 80203





303.595.0941

sthurston@semplelaw.com

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**4 attachments**

-  **T Hunter and Geist 201512217 enc sig pages and change sheets.docx.pdf**  
38K
-  **Nathan Thompson Sig Page and Corrections 201251211.pdf**  
168K
-  **Kevin Kolasa signature page and corrections 20151204.pdf**  
193K
-  **Darrell Meredith signature page 20151120.pdf**  
56K

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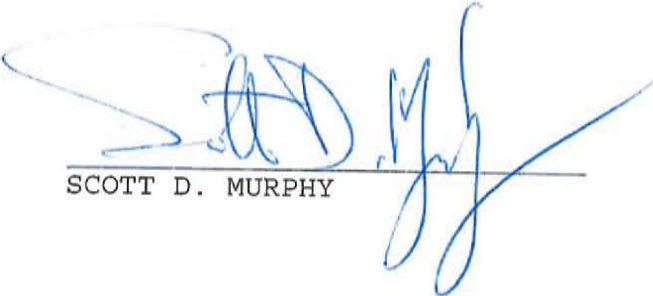




1 I, SCOTT D. MURPHY, do hereby certify  
 2 that I have read the above and foregoing deposition  
 3 and that the same is a true and accurate transcription  
 4 of my testimony, except for attached amendments, if  
 5 any.

6 Amendments attached (X) Yes ( ) No

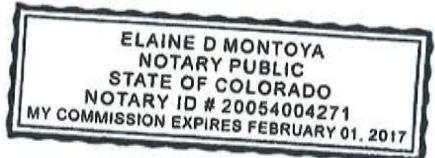
7  
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 SCOTT D. MURPHY

13 The signature above of SCOTT D. MURPHY  
 14 was subscribed and sworn to before me in the county of  
 15 Denver, state of Colorado,  
 16 this 29th day of December, 2015.

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Elaine D. Montoya  
 Notary public  
 My Commission expires: 2-1-17



25 Michael Davis, et al. 11/11/15 (am)



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Received By:  
Hunter + Geist  
DEC 29 2015

## AMENDMENTS TO DEPOSITION

The deponent, Scott Murphy, wishes to make the following changes in the deposition:

Page	Line	Should Read	Reason
13	17	Replace "I don't remember her official title" with "Director of Alternative Education"	Reviewed records
14	14	Add the following: "LPS did not have a formal district policy about threat assessments."	Clarification
18	21 & 22	Replace "the" with "all" and strike "or at least one of them"	Correction
21	14	Replace "I don't recall a discussion around that" with "All principals and assistant principals, and mental health staff would be required to take training."	Recollection refreshed
25	7	Replace "what did get" with "whether it got"	Clarification
25	14	Replace "I" with "she"	Clarification
27	11	Replace "they" with "the Sheriff's investigators"	Clarification
29	10	Delete the word "media" and replace "sat" with "met"	Clarification
30	23	Replace "I don't recall" with "No, but I did not read the 4,000 papers and I did not know what the Sheriff had learned in his investigation."	Recollection refreshed
31	9	Add "I thought they knew."	More complete answer
32	6	Add "yes" at beginning of sentence	Clarification
32	10	Replace "now this is just a non-fish" with "I am just a non official"	Correction
33	10	Replace "I don't recall specifically" with "yes"	Correction
36	11	Add the following: "The District also established a District Review Team for all threat assessments."	Further recollection



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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
40	2	Delete lines 2-5 and replace with "Yes. It's in Exhibit I"	Misunderstood question
42	5	Add the following: "but the fourth concrete step does not address interagency information sharing."	Clarification
43	9	Add "but LPS has paid half the cost for SROs at its schools for many years."	Clarification
55	2-7 & 11-13	Replace lines 2-7 and 11-13 with "after the shooting, the Sheriff and District Security decided that a Campus Supervisor would be stationed near the north doors which would be unlocked the entire school day. Allen Wrenching was no longer an issue."	Clarification
58	24 - 25	Replace lines 24-25 with "Probably sometime before 2006 which was my last year as Assistant Superintendent of Business Services."	Clarification
69	10-11	Delete lines 10 - 11 and replace with "School districts are required to randomly test school bus drivers for drugs and alcohol."	Clarification
86	19	Add the following: "There was also concern for the principal's safety."	Clarification
91	10	Add the following: "But I thought that they knew."	Clarification
92	12	Add the following: "except that the AHS security team was asked to watch Karl Pierson closely after that."	Clarification
105	7 & 9	Delete lines 7 & 9 and replace with "No, Bryan Jessie was an Assistant Principal."	Wrong answer Checked Ex. 2 & 3
108	1	Add the following: "in his decision about the gun-viewing."	Clarification
108	25	Replace "was" with "had been"	Wrong tense
116	9	Replace "two" with "too"	Wrong word
116	13	Replace "mess" with "very emotional"	Wrong word





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DEC 29 2015

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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
128	1 - 3	Delete lines 1 -3 and replace with: "No, they saw the incident and there were no documents pertaining to it."	Further reflection
130	9 - 10	Replace "as well as a violation" with "if FERPA is violated routinely"	Clarification
138	8	Add the following: "but the date of December 14 is obviously wrong, because that was a Saturday. The Sheriff had closed AHS as a crime scene and LPS personnel weren't allowed access to AHS until Sunday, December 15th. The conversations were probably on December 17th which is the date of the search warrant."	Clarification
142	10	Add the following: "My understanding is that Melissa Cooper, Nate Thompson and others found the Threat Assessment in a folder in Esther Song's office at Arapahoe High School on Sunday December 15. They took it back to the ESC it remained until it was given to the Sheriff's investigation on or about December 17."	Clarification
142	22 - 25	Delete lines 22 - 25 and replace with "Melissa Cooper and others went over to AHS, found the Threat Assessment in Esther Song's office and brought it back to the ESC on December 15."	Clarification
148	20	Add the following at the end: "been given to the Sheriff"	Clarification
149	17	Delete the words "or the behavior incident" and add the word "log"	Incorrect Answer
150	18 - 20	Delete lines 18 -20 and replace with "The Swomley incident is not reported in the contact log"	Wrong answer Reviewed Exhibit 24
153	7	Add the following: "My understanding is that the investigator already had the document."	Clarification
153	24	Add the following: "I thought it was"	Clarification
154	5	Replace "off with "on"	Wrong word
165	8	Add the following: "No one at LPS has told me that any of Pierson's teachers ever wrote up a referral on him."	Clarification



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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
171	21 - 24	Delete lines 21 - 24 and replace with: "LPS could not order nor commit to interviews of its staff and students. The proposal seemed premature to me."	Clarification
172	1	Add the following: "although I also was very skeptical that the Piersons would voluntarily participate in this study without a waiver of liability."	More complete answer
172	12	Add the following: "LPS would not have had the authority to order its employees or students to participate."	More complete answer

Subscribed and sworn to before me

this 29<sup>th</sup> day of December, 20 15

Elaine D Montoya  
Notary Public

My Commission Expires: 2-1-17

  
\_\_\_\_\_  
Signature of Deponent

ELAINE D MONTOYA  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID # 20054004271  
MY COMMISSION EXPIRES FEBRUARY 01, 2017



Received By:  
Hunter + Geist

DEC 29 2015

Karen Hardy &lt;karen@huntergeist.com&gt;

---

**Deposition signature page and amendment sheet for Scott Murphy**

---

Karen Hardy &lt;karen@huntergeist.com&gt;

Wed, Dec 30, 2015 at 8:08 AM

Draft To: Filing Department &lt;filing@huntergeist.com&gt;

----- Forwarded message -----

From: Elaine Montoya &lt;EMontoya@semplelaw.com&gt;

Date: Tue, Dec 29, 2015 at 4:54 PM

Subject: Deposition signature page and amendment sheet for Scott Murphy

To: "karen@huntergeist.com" &lt;karen@huntergeist.com&gt;

Cc: Steve Everall &lt;severall@semplelaw.com&gt;

Hi Karen,

Please see the attached executed signature page and amendment sheet for deponent Scott Murphy re the Arbitration of Michael and Desiree Davis and Littleton Public Schools.

Thank you,

Elaine Montoya

Office Manager/Paralegal

Semple, Farrington &amp; Everall, P.C.

1120 Lincoln Street, Suite 1308

Denver, Colorado 80203

Phone: (303) 595-0941

Fax: (303) 861-9608

[emontoya@semplelaw.com](mailto:emontoya@semplelaw.com)

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**2 attachments** **Signature Page - Murphy, Scott - (Executed) 20151229.pdf**  
43K **Amendments to Deposition - Murphy, Scott (Executed) 20152912.pdf**  
235K



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OCT 20 2015

## AMENDMENTS TO DEPOSITION

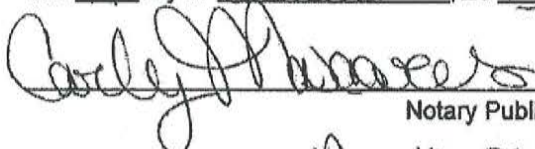
The deponent, Tracy Murphy, wishes to make the following changes in the deposition:

Page	Line	Should Read	Reason
54	11 - 12	My answer was "Excited, exuberant, you know, over the top, happy." That was his reaction to having <u>made</u> it to Nationals. It wasn't until the September 3 meeting with him and his mother that I had any meaningful conversation about how he did. I think this is an important distinction.	Either I misunderstood the question or the reporter did. The question was "What was Karl's reaction to his results at nationals?" I didn't hear from him that summer about how he thought he did at the competition.
108	11 - 12	In my answer to the question "Was Mark Loptien also taken aback, if you recall, or if you discussed with him, by Ms. Pramenko's response or lack of response?" it reads "...easily gets surprised by things, but he - it's unusual of Mark to be skeptical of administration sometimes." I believe I said "It's not unusual of Mark to be skeptical...".	This changes the perspective I am attempting to present about Mark.
194	8	Reads "don't cross paths with a lot of kids." I meant to say "you just cross paths with a lot of kids."	In other words, the opposite meaning of what was recorded. The point was that it was likely that he and I would cross paths numerous times but we didn't.
209-210		When describing my conversation with Natalie the previous year about my concerns with all staff having a master key and how this could play into a Columbine-like situation, the profile of the kind of student I was especially troubled by. In the conversation she and I had in the hallway outside the library about the master keys, I told her that the student that most concerned me at a school like Arapahoe was the high achieving male student (it's always a male) who gets a "B" and feels like his life is destroyed because he believes that will keep him out of Harvard and decides to make us pay for it.	I think it is important that this is, if possible, amended to my testimony since it eerily describes Karl Pierson (or, at least, how he saw himself). Natalie dismissed my concerns with stating that "we don't have kids like that" or something to that effect.
		Karla Brachtenbach's first name is consistently misspelled as Carla.	
113		Jill Debow's last name is misspelled as DeVose.	
223		The statement that the proceedings concluded on the 15th day of July should read that the proceedings concluded on the 20th day of July.	I testified on July 20.

Subscribed and sworn to before me

this 19 day of October, 2015

  
Signature of Deponent

  
Notary Public

My Commission Expires: Aug 10, 2016

CARLY B MASCARENAS  
Notary Public  
State of Colorado  
Notary ID 20124047037  
My Commission Expires Aug 10, 2016





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OCT 20 2015

Bobbe Koch <bkoch@huntergeist.com>

---

## Fwd: Tracy Murphy correction sheet

---

Bobbe Koch <scheduling@huntergeist.com>  
Draft To: Kathy Azcuenaga <kathy@huntergeist.com>

Tue, Oct 20, 2015 at 11:17 AM

From: **Kaiser, Charles [CO]** <chkaiser@coloradoea.org>  
Date: Tue, Oct 20, 2015 at 9:04 AM  
Subject: Tracy Murphy correction sheet  
To: Kathy Azcuenaga <kathy@huntergeist.com>  
Cc: "Roche, Michael (LG)" <MRoche@lathropgage.com>

Ms. Azcuenaga, Please find enclosed the correction sheet of Tracy Murphy  
Charles F. Kaiser  
Colorado Education Association  
1500 Grant Street  
Denver, CO 80203  
Phone: (303) 837-1500  
Fax: (303) 861-2039

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-----Original Message-----

From: co-scanner@coloradoea.org [mailto:co-scanner@coloradoea.org] On Behalf Of co-scanner@  
Sent: Tuesday, October 20, 2015 7:01 AM  
To: Kaiser, Charles [CO] <chkaiser@coloradoea.org>  
Subject: Scanned image from MX-6201N

Reply to: co-scanner@coloradoea.org <co-scanner@coloradoea.org> Device Name: Not Set Device Model:  
MX-6201N  
Location: Not Set

File Format: PDF MMR(G4)  
Resolution: 200dpi x 200dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader4.0 or later version, or Adobe(R)Reader(TM) of Adobe Systems Incorporated to view the document.

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October 26, 2015

Michael J. Roche, Esq.  
Lathrop & Gage, LLP  
950 17<sup>th</sup> Street  
Suite 2400  
Denver, Colorado 80202

In Re the Arbitration of: Michael and Desiree Davis and Littleton Public School District  
Deposition of: Tracy Murphy (07.20.15)

Dear Mr. Roche:

We have received by e-mail the attached file containing the signed amendment page for the above-named deposition, which we are forwarding to you to place with the original transcript.

Sincerely,

Bobbe Koch and Karen Hardy  
HUNTER + GEIST, INC.  
Court Reporting, Legal Videography, and Videoconferencing

c: Steve Overall, Esq.  
Charles Kaiser, Esq.

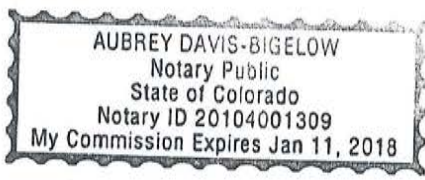
1 I, NATALIE PRAMENKO, do hereby certify  
2 that I have read the above and foregoing deposition  
3 and that the same is a true and accurate transcription  
4 of my testimony, except for attached amendments, if  
5 any.

6 Amendments attached  Yes ( ) No

7  
8 Natalie Pramenko  
9 NATALIE PRAMENKO  
10

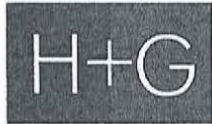
11  
12 The signature above of NATALIE PRAMENKO  
13 was subscribed and sworn to before me in the county of  
14 Douglas, state of Colorado,  
15 this 24<sup>th</sup> day of December, 2015.

16  
17 Aubrey Davis-Bigelow  
18 Notary Public  
19 My Commission expires: 1/11/18  
20



21  
22  
23  
24  
25 Michael and Desiree Davis 11/6/15 (ekl)





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## AMENDMENTS TO DEPOSITION

The deponent, Natalie Pramenko, wishes to make the following changes in the deposition:

Page	Line	Should Read	Reason
18	22	I don't believe I had learned that he had not signed the attendance list for the danger/threat assessment training until recently, way after. To be clear, Kevin never told me one way or the other.	Clarification
34-35	23-25 & 1-2	It's only administrators and counselors. Administrators and counselors have always been able to access the behavior log in Infinite Campus.	Clarification on who can and could access behavior information in Infinite Campus.
36	8-9	A. The counselors.	Clarification on who can and could access behavior information in Infinite Campus.
36	12-13	Yes. Teachers do not currently have access to the discipline tab in Infinite Campus	Clarification on who can and could access behavior information in Infinite Campus.
36	18-19	The School Resource Officers do not have access to discipline records in Infinite Campus. They only have access to the Summary page.	Clarification on who can and could access behavior information in Infinite Campus.
44	3	Add: Since the deposition, I have added all counselors and administrators to the list of AHS personnel who receive the initial tips from Safe2Tell.	Additional information regarding a change in practice following the deposition.
48	2	Strike "yes". Add: My impression was that we had made efforts to let students know about Safe2Tell. I don't know how successful we were.	Clarification
78	12	Replace the word "representation" with "representative".	Wrong word.
112	16-17	I'm not sure the 2011 one should have been because he was not disciplined, and it was entered into the Infinite Campus Counseling Contact Log, but the one...	Clarification
137	1-2	somewhere. I didn't know the extent of the incident- to call it violent, I didn't know that until after December 13th.	Correction of pronoun and clarification of time line
137	25	replace "fact" with "13th"	Clarification of time line
141	4	A. replace "uh-hum" with "yes"	Clarification



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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
141	12	Replace "it" with "the shooting"	Clarification of pronoun
141	21	A. No. Well, after the shooting she did.	Clarification clarification of time line
152	5-7	It's built around the pillars of Community, Connections, Life Skills, and Practices. Strike: "I'm not going to remember the four pillars off the top of my head." – but community, building community. . .	Looked up the foundational pillars of our Advisement Class following the deposition. This provides clarification.
177	4	Strike: "every period"	Correction to my statement. We have hall duty every day, but not every period.
209-210	25-1	looked down on, they can't control their classroom or that they shouldn't be writing that many referrals.	Clarification to make the point that I want teachers writing more referrals.
211	25	Replace "they" with "the legislators"	

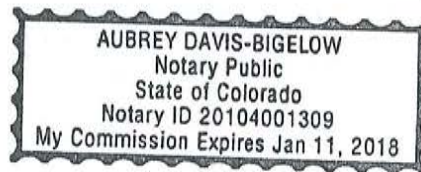
Subscribed and sworn to before me

this 24<sup>th</sup> day of December, 2015

Notary Public

My Commission Expires: 1-11-18

Signature of Deponent





Received By:  
Hunter + Geist  
DEC 24 2015

Karen Hardy <karen@huntergeist.com>

---

**Fwd: Davis v. LPS**

---

Karen Hardy <karen@huntergeist.com>  
Draft To: Filing Department <filing@huntergeist.com>

Mon, Dec 28, 2015 at 9:55 AM

----- Forwarded message -----

From: **Brenda Westra** <bwestra@semplelaw.com>  
Date: Thu, Dec 24, 2015 at 12:26 PM  
Subject: Davis v. LPS  
To: Kathy Azcuenaga <kathy@huntergeist.com>  
Cc: Steve Everall <severall@semplelaw.com>

Hi Kathy. Attached please find the Amendment to Deposition sheets for the deposition of Natalie Pramenko in the above matter. Thanks and Happy Holidays!

Brenda Westra, Paralegal

Semple, Farrington & Everall, P.C.

1120 Lincoln Street, Suite 1308

Denver, CO 80203

303.595.0941

303.861.9608 (fax)

bwestra@semplelaw.com

---

 **Natalie Pramenko Amendments to Deposition.pdf**  
2494K



1 I, JAMES ENGLERT, do hereby certify that  
2 I have read the above and foregoing deposition and  
3 that the same is a true and accurate transcription of  
4 my testimony, except for attached amendments, if any.

5 Amendments attached ( ) Yes (X) No


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\_\_\_\_\_  
JAMES ENGLERT

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13 The signature above of JAMES ENGLERT was  
14 subscribed and sworn to before me in the county of  
15 Arapahoe, state of Colorado,  
16 this 3 day of August, 2015.

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\_\_\_\_\_  
Notary public  
My Commission expires:

**SHALEE BYERRUM**  
**NOTARY PUBLIC**  
**STATE OF COLORADO**  
**Notary ID 20024016018**  
**My Commission Expires 04/16/2019**

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25 Michael Davis, et al., 7/1/15 (am)



Received By:  
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AUG 11 2015

Office of the County Attorney

5334 South Prince Street  
Littleton, Colorado 80120-1136  
Phone: 303-795-4639  
Fax: 303-738-7836  
[www.co.arapahoe.co.us](http://www.co.arapahoe.co.us)  
[attorney@co.arapahoe.co.us](mailto:attorney@co.arapahoe.co.us)

Hunter + Geist, Inc.  
Natasha Ohaion  
1900 Grant St., Ste. #1025  
Denver, CO 80203

RONALD A. CARL  
County Attorney

In Re the Arbitration of: Michael and Desiree Davis and Littleton Public Schools  
Signature page for James Englert transcript

Dear Ms. Ohaion:

Please find enclosed the original signature page for the deposition transcript of James Englert dated August 3, 2015.

If you have any questions, please contact our office.

Sincerely,

Erin Powers  
Assistant County Attorney

Encl. Original signature page



Received By:  
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NOV 16 2015

I, ESTHER SONG, do hereby certify that I have read the above and foregoing deposition and that the same is a true and accurate transcription of my testimony, except for attached amendments, if any.

Amendments attached (X) Yes ( ) No

*Esther Song*  
ESTHER SONG

The signature above of ESTHER SONG was subscribed and sworn to before me in the county of Denver, state of Colorado, this 11<sup>th</sup> day of November, 2015.

KATHLEEN J. LETNER  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20034041659  
MY COMMISSION EXPIRES DECEMBER 10, 2015

*Kathleen J. Letner*  
Notary public  
My Commission expires: 12/10/15

Received By:  
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NOV 16 2015

AMENDMENT TO DEPOSITION

The witness, Esther Song, states she wishes to make the following changes in the transcript of ~~his~~ her deposition testimony as originally transcribed:

PAGE	LINE	SHOULD READ	REASON
<u>8</u>	<u>16</u>	<u>Mr. Wolpohn</u>	<u>Typo</u>
<u>18</u>	<u>23</u>	<u>or it could have been five children; it varied</u>	<u>accuracy</u>
<u>36</u>	<u>17</u>	<u>Lewallen</u>	<u>Typo</u>
<u>57</u>	<u>9</u>	<u>but it was usually within 24 hours</u>	<u>clarification</u>
<u>58</u>	<u>11</u>	<u>there was a "You Matter Club" of which I was a sponsor</u>	<u>recalled after deposition</u>
<u>115</u>	<u>3</u>	<u>Past history but there were no reports of physical aggression for ten years.</u>	<u>Clarification</u>

Esther Song

(signature of witness)

SUBSCRIBED AND SWORN TO ME THIS 11<sup>th</sup> DAY OF November, 2015  
My commission expires 12/10/15.

KATHLEEN J. LETNER  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20034041659  
MY COMMISSION EXPIRES DECEMBER 10, 2015

Notary Public, State of Colorado  
Street Address 7900 E. Union Ave, Suite 600  
City and State Denver, CO 80237

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ATTORNEYS AT LAW

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PETER WATSON  
1923 - 2004

ANDREW J. FISHER  
1985-2009

HOWARD W. BREMER  
Retired

Hunter + Geist  
1900 Grant Street, Suite 1025  
Denver, CO 80203

**Re: Esther Song Deposition of October 9, 2015**

Dear Sir or Madam:

Enclosed please find the original amendment sheet and signature page executed by Ms. Song.

Please do not hesitate to contact our office with any questions or concerns. Thank you.

Sincerely,



Rebecka Drieth, Paralegal

enclosures

**NATHAN DUMM & MAYER P.C.**  
ATTORNEYS AT LAW

7900 EAST UNION AVENUE  
SUITE 600  
DENVER, COLORADO 80237-2776

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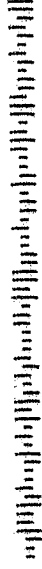


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Denver, CO 80203

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■ [scheduling@huntergeist.com](mailto:scheduling@huntergeist.com)

November 25, 2015

Michael J. Roche, Esq.  
Lathrop & Gage, LLP  
950 17<sup>th</sup> Street  
Suite 2400  
Denver, Colorado 80202

In Re the Arbitration of: Michael Davis, et al. v. Littleton Public School District  
Deposition of: Esther Song (10.09.15)

Dear Mr. Roche:

We have received by mail the attached file containing the original signature page and amendment page for the above-named deposition, which we are forwarding to you to place with the original transcript.

Sincerely,

Karen Hardy  
Hunter + Geist, Inc.  
Court Reporting, Legal Videography, and Videoconferencing  
[filing@huntergeist.com](mailto:filing@huntergeist.com) | [www.huntergeist.com](http://www.huntergeist.com)

**"Your Partner in Making the Record"**

1900 Grant Street, Suite 1025, Denver, Colorado 80203  
[303-832-5966](tel:3038325966) | [800-525-8490](tel:8005258490)

c: Steve Overall, Esq.  
J. Andrew Nathan, Esq.





# Hunter + Geist, Inc.

Your Partner in Making the Record

December 21, 2015

Michael J. Roche, Esq.  
Lathrop & Gage, LLP  
950 17<sup>th</sup> Street  
Suite 2400  
Denver, Colorado 80202

In Re the Arbitration of: Michael Davis, et al. and Littleton Public School District  
Deposition(s) of: Nathan Thompson (10.12.15), Kevin Kolasa (10.14.15) and  
Darrell Meredith (06.30.15)

Dear Mr. Roche:

We have received by e-mail the attached file(s) containing the signature page(s) and/or amendment page(s) for the above-named deposition(s), which we are forwarding to you to place with the original transcript(s).

Sincerely,

Karen Hardy  
Hunter + Geist, Inc.  
Court Reporting, Legal Videography, and Videoconferencing  
[filing@huntergeist.com](mailto:filing@huntergeist.com) | [www.huntergeist.com](http://www.huntergeist.com)

**"Your Partner in Making the Record"**

1900 Grant Street, Suite 1025, Denver, Colorado 80203  
[303-832-5966](tel:3038325966) | [800-525-8490](tel:8005258490)

c: Steve Overall, Esq.

**303.832.5966**  
**800.525.8490**

1900 Grant Street  
Suite 1025  
Denver, CO 80203

■ [www.huntergeist.com](http://www.huntergeist.com)  
■ [scheduling@huntergeist.com](mailto:scheduling@huntergeist.com)

NATHAN THOMPSON

Received By:  
Hunter + Geist  
DEC 17 2015

277

1 I, NATHAN THOMPSON, do hereby certify  
2 that I have read the above and foregoing deposition  
3 and that the same is a true and accurate transcription  
4 of my testimony, except for attached amendments, if  
5 any.

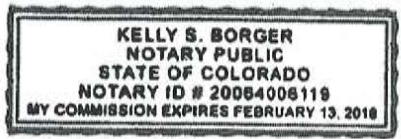
6 Amendments attached (✓) Yes ( ) No

7  
8 Nathan H. Thompson  
9 NATHAN THOMPSON  
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The signature above of NATHAN THOMPSON  
was subscribed and sworn to before me in the county of  
Arapahoe, state of Colorado,  
this 11<sup>th</sup> day of December, 2015.

Kelly S. Berger  
Notary public  
My Commission expires:



Michael Davis, et al. 10/12/15 (am)



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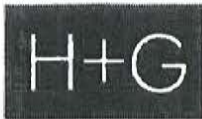
## AMENDMENTS TO DEPOSITION

The deponent, Nathan Thompson, wishes to make the following changes in the deposition:

Page	Line	Should Read	Reason
16	25	Strike "Correct." Replace with "They were attending a special treatment program located inside a public school building. Some were in LPS and some were in other districts".	Clarification of answer.
32	4-5	Strike at "a higher level" and replace with "greater".	Clarification of answer.
43	18	Add sentence "After checking, there were 40 reports in 2013-14 and 74 in 2014-15."	Checked actual numbers.
47	3	Strike "Uh-huh" replace with "Yes."	Clarification
71	8	Add "the school" prior to "psychologist"	Clarification
113	10	Strike "Occasionally" and replace with "Occasional".	Clarification
120	10	Add " I know she was aware of the incident because it was described on the Threat Assessment form."	Clarification of answer.
123	13	Strike the "," and add "they graduate" after "after,".	Clarification of answer
150	3	Strike "Pierson" replace with "peers".	Correction
154	11	Strike "here's" and replace with "hears".	Correction
157	5-6	Strike " there was legal issues that a kid would be charged." Replace with "it was clear that a kid could be legally charged."	Clarification of answer
160	19	Strike the "." and add ", Karen Gerlich and Michelle Crookham."	Remembered afterward
162	17	Strike "they're" and replace with "they were"	Correction
162	19	Strike "testimony" and replace with "time"	Correction



DEC 17 2015



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AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
171	13	Strike period and add "who said she was going to have him evaluated."	Recalled additional information
200	4	Add "other" between "every" and "year"	Correction
200	19	Strike "director" and replace with "district"	Correction
201	5	Strike lines 1-5 and replace with "All of the AHS administrators and mental health team participated in a training in February, 2014. A new administrator attended during the 2014-15 year."	Checked records
222	19-20	Strike "I can't recall exactly what's" and replace with "There is nothing".	Reviewed the MOU after the deposition
222	23	Add sentence: "LPS does have a form that law enforcement can use to request information or records."	Clarification of answer
232	7	Add "and areas of improvement" after "well" before the period.	More complete answer
233	1	Strike the period and add "and Patti Turner, Director of Learning Services."	Recalled additional information
271	9	Strike "from wherever".	Clarification / Correction

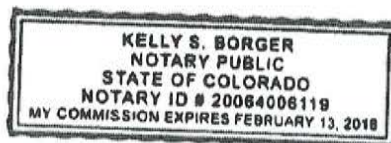
Subscribed and sworn to before me

this 11<sup>th</sup> day of December, 2015

Kelly S. Berger  
Notary Public

My Commission Expires: 2/13/2018

Nathan H. Thompson  
Signature of Deponent







Received By:  
Hunter + Geist  
DEC 17 2015

Bobbe Koch <bkoch@huntergeist.com>

---

## Arbitration of Davis and Littleton Public School District; JAG No. 2015-0665A

1 message

---

Sally Thurston <sthurston@semplelaw.com>

Thu, Dec 17, 2015 at 3:00 PM

To: "scheduling@huntergeist.com" <scheduling@huntergeist.com>

Cc: Steve Everall <severall@semplelaw.com>

Attached please find correspondence from Stephen G. Everall, Esq. of this firm, as well as the deposition signature pages and correction sheets for Nathan Thompson and Kevin Kolasa. A signature page only is attached for Darrell Meredith.

If you have any questions, please contact us.

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**4 attachments**



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**Nathan Thompson Sig Page and Corrections 201251211.pdf**

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**Kevin Kolasa signature page and corrections 20151204.pdf**

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