

G. The term "defendant" means defendant, Board of Education of the City of Chicago, and its representatives, agents, assigns, attorneys, employees, divisions, departments, agencies, and all other persons acting or purporting to act on behalf of it.

H. Unless specifically set forth in an individual request, this document request covers the period from 2000 to the present.

I. These document requests shall be deemed continuing in nature from the time of this cause, and if further information comes to your knowledge or to that of your attorney, or agent, in this regard, you are hereby requested without further notice to make any such documents available for inspection and copying.

DOCUMENTS TO BE PRODUCED

1. Any and all documents, statements and/or communications that were identified or relied upon in responding to Defendant Board's First Set of Interrogatories to Plaintiff.

2. All documents, written materials, photographs, recorded statements and/or notes of oral statements, reports and/or opinions of plaintiff, Defendant Board or any other person that refer, relate or pertain to the matters alleged in plaintiff's complaint.

3. All correspondence between plaintiff and Defendant Board.

4. All documents relating to any matter raised in plaintiff's complaint.

5. All documents relating to plaintiff's contention that defendant's alleged actions caused her to suffer damages, including but not limited to all medical or psychiatric records and bills which relate in any way to any damages plaintiff's claim

she suffered and/or any other documents which reflect any economic and/or emotional injury as a result of the conduct alleged in the complaint.

6. If plaintiff is seeking from defendant any damages for any physical injuries and/or any psychological injuries, please tender all doctor, hospital, psychiatric or other medical records, reports, files, bills, x-rays, photographs, and other documents or materials referring or relating to any medical, psychiatric or drug/alcohol related treatment she has sustained for any reason during the last five years.

7. Any and all documents relating to any claim of discrimination plaintiff has made, including claims made relating to previous employment with Defendant Board or any other employer.

8. Any and all documents referred to in Interrogatory No. 15.

9. All communications, including but not limited to e-mails to and/or from any of your personal e-mail accounts, such as aeabarnes@hotmail.com, and/or Chicago Public Schools e-mail account(s), regarding your duties, your job performance (whether positive or negative), your job applications, your requests for transfers and any inquiries you made regarding job openings or positions.

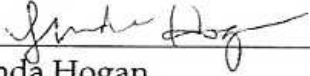
10. Any and all documents identified in plaintiff's Rule 26(a)(1) initial disclosures.

11. Any and all documents supporting plaintiff's claim for monetary damages, including but not limited to, plaintiff's federal and state income tax returns and W-2's for the years 2007 to the present.

12. Any and all documents supporting plaintiff's response to Interrogatory No. 27, including but not limited to, federal and state income tax returns.


Respectfully submitted,

Patrick J. Rocks
General Counsel

By: 
Linda Hogan
Assistant General Counsel
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CERTIFICATE OF SERVICE

I, Linda Hogan, state that I caused a copy of the above **Defendant Board's First Set of Document Requests to Plaintiff** to Deidre Baumann, Baumann & Shuldiner, 20 South Clark Street, Suite 500, Chicago, Illinois 60603 be served by facsimile and U.S. mail to before the hour of 5:00 p.m. on April 9, 2010.


Linda Hogan