

the court to adjudicate the validity of the refusal, and identify each document and oral communication for which privilege is claimed.

o. No answer is to be left blank. If the answer to an interrogatory or subparagraph of an interrogatory is "none" or "unknown," such term shall be written in the answer.

p. These Interrogatories are of a continuing character. Pursuant to Federal Rule of Civil Procedure 26, if additional information within the scope of any interrogatory becomes available to you after you serve answers hereto upon Defendant Board, you shall furnish such additional information to defendant by way of supplemental answers.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each person answering or supplying information for use in answering each interrogatory and identify each document used in the preparation of each answer.

ANSWER:

INTERROGATORY NO. 2:

Identify each individual who has knowledge of the allegations contained in Plaintiff's Complaint. For each individual, state their name, address and telephone number. Also, identify the specific facts of which each individual has knowledge.

ANSWER:

INTERROGATORY NO. 3:

Identify all similarly-situated younger employees Plaintiff claims were treated differently than her by Defendant Board. Identify the manner in which Defendant Board treated her that resulted in discrimination against Plaintiff.

ANSWER:

INTERROGATORY NO. 4:

Identify all similarly-situated non-African-American employees Plaintiff claims were treated differently than her by Defendant Board. Identify the manner in which Defendant Board treated her that resulted in discrimination against Plaintiff.

ANSWER:

INTERROGATORY NO. 5:

Identify all reasons you believe you were the "Department Chair" at Chicago Military Academy since 2001, and identify the date you were given that title, the person who gave you that title, your job duties each year you were Department Chair, the department of which you were chair and identify whether, at any point between 2001 and June 2008, you did not serve as Department Chair.

ANSWER:

INTERROGATORY NO. 6:

State the name, address and telephone number of any and all expert witnesses Plaintiff either expects to call at trial or will call at trial and specify the basis and nature of each expert witness' testimony. With respect to expert witnesses, state the following:

- a) The subject matter on which the expert is expected to testify;
- b) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion; and
- c) State whether Plaintiff has any written reports from each expert. If yes, please produce a report from any and all expert witnesses which may

have been retained by you in compliance and pursuant to Fed. R. Civ. Proc. 26 (b) (2) (B) and 34.

ANSWER:

INTERROGATORY NO. 7:

Identify each and every individual or entity employed by or affiliated with Defendant Board with whom Plaintiff communicated regarding the alleged discrimination against Plaintiff on the basis of race or age. For each communication, please identify the date of the communication, the person or entity to whom the communication was made, the substance of the communication and the medium of the communication.

ANSWER:

INTERROGATORY NO. 8:

Identify all communications, including emails, Plaintiff had with Isadore Glover, Jr. regarding any of the subjects at issue in Plaintiff's Complaint. For each communication, identify the date, location, medium and substance of the communication and all witnesses to the communication.

ANSWER:

INTERROGATORY NO. 9:

Identify all reasons plaintiff believes she was entitled to a "60-day assignment," as that term is used in Paragraph 9 of the Complaint, and all documents or other sources upon which she bases that belief, including the section of the Chicago Teachers Union Collective Bargaining Agreement to which she refers in Paragraph 9.

ANSWER:

INTERROGATORY NO. 10:

Identify all communications Plaintiff had with anyone employed by Defendant Board regarding a "60-day assignment" for plaintiff, as that term is used in Paragraph 9 of the Complaint. For each communication, identify the date, location, medium and substance of the communication and all witnesses to the communication.

ANSWER:

INTERROGATORY NO. 11:

Has plaintiff ever received a wristband, ticket or other invitation to enter early into a Chicago Public Schools job fair? If so, identify the manner in which she was invited, the date of the job fair, the location of the job fair, whether she attended and if she did not, why not.

ANSWER:

INTERROGATORY NO. 12:

Has plaintiff ever known of any person age 40 or older who received a wristband, ticket or other invitation to enter early into a Chicago Public Schools job fair? If so, identify all such people, the manner in which they were invited, the date of the job fairs, and the location of the job fairs.

ANSWER:

INTERROGATORY NO. 13:

Has plaintiff ever been invited to a Chicago Public Schools job fair, whether the invitation included early entrance or not? If so, identify all job fairs to which she was invited, the manner in which she was invited, the date of the job fairs, the location of the job fairs, whether she attended and if not, why not.

ANSWER:

INTERROGATORY NO. 14:

Did plaintiff interview with anyone for the position at Fenger High School referenced in Paragraph 12 of the Complaint? If not, identify why not. If so, identify the person or people with whom she interviewed, and the date and location of the interview.

ANSWER:

INTERROGATORY NO. 15:

Have you applied for any jobs or work, whether full-time, part-time, contract or substitute in nature, since June 2008? If so, please state:

- a) The individual, company, school or organization from whom you sought employment;
- b) The date(s) and manner in which you applied (e-mail, internet, fax, mail, hand delivery, CPS Candidate Application System, etc.);
- c) The document(s) you submitted to the potential employer in applying for the job;
- d) The job title for which you applied;
- e) The date of any interview(s);
- f) The name(s) of any person(s) to whom you spoke or otherwise communicated, whether orally or in writing, regarding the job; and
- g) Whether the position(s) were offered to you.

ANSWER:

INTERROGATORY NO. 16:

Identify and describe any and all injuries and damages that Plaintiff contends were suffered as a result of the incidents alleged in Plaintiff's Complaint. For any element of injury or damage for which Plaintiff claims compensation in money or money's worth, identify:

- a) Each element of injury or damages;
- b) The dollar amount of each such alleged injury;
- c) The duration of the alleged damage(s);
- d) The method of calculation of each element; and,

- e) Any efforts you made to mitigate such injury or damage.

ANSWER:

INTERROGATORY NO. 17:

Are you claiming any lost income as a result of the alleged incidents involved in this litigation? If so, please specify:

- a) The total gross and net income lost;
- b) The claimed source of any alleged lost income, including name and address of each such source;
- c) The manner, that is, by daily rate, weekly, monthly, etc. by which you compute the amount of any claimed loss.

ANSWER:

INTERROGATORY NO. 18:

If your answer to Interrogatory Number 17 is "yes," please state whether you have documents, including tax returns, that substantiate your claimed loss of earnings, and include:

- a) A full description of each such document; and
- b) The name and address of the person or persons now in possession of each such document or any copy of the same.

ANSWER:

INTERROGATORY NO. 19:

Please list any other expenses, damages or detriments incurred by you, which resulted from the alleged incident(s) involved in this litigation (that you have not previously listed.)

ANSWER:

INTERROGATORY NO. 20:

Have you sought any medical care or treatment, or other professional care, or have you been admitted to any hospital, medical or psychiatric institution, or clinic for the injuries allegedly sustained by you as a result of the alleged act of Defendant Board in this case? If yes, please state:

- a) The names, addresses and telephone numbers of any and all persons who rendered medical care or treatment or other professional care, hospitals, or medical institutions who or which rendered services to you.
- b) The date or dates of examination, care, or treatment by each such person who rendered medical care or treatment or other professional care, the date or dates of admission and discharge as to each hospital or medical institution.
- c) The nature of the care or treatment rendered by each such person who rendered medical care or treatment or other reason or reasons for each treatment or hospitalization.
- d) The amount of monies paid by Plaintiff and/or any agent on her behalf relative to any such treatment, counseling, whether in-patient or outpatient.

ANSWER:

INTERROGATORY NO. 21:

Within the last ten (10) years, have you ever been admitted to any hospital or other medical institution, or been under the care of any health care practitioner for any type of health related reason, including complaints of an emotional and/or psychological nature? If so, please state:

- a) The name, and address, of each such hospital or health care facility and each such health care practitioner;
- b) The date of treatment, confinement or admission, if any, in each such hospital or health care facility or office, and the dates of treatment by any such health care practitioner; and,
- c) The reason for your treatment or confinement at or in such hospital or health care facility or office and the conditions for which you were treated by such health care practitioner.

ANSWER:

INTERROGATORY NO. 22:

If Plaintiff has ever been involved in any civil legal action, including but not limited to any state administrative action or grievance proceeding, either as a defendant or plaintiff, please state:

- a) The title of said action or proceeding;
- b) The date and place where each such action was filed, including the name of the court and/or forum of the proceeding was heard, the names of the parties involved;
- c) The court file number of all such actions;
- d) The names of the attorneys representing each party and their addresses and phone numbers;
- e) A description of the nature of each such action;
- f) The disposition of each such action, including, if applicable, whether there was an appeal and the result of the appeal, including the name and citation of each case reported; and
- g) The amount of any settlement or judgment obtained in each case.

ANSWER:

INTERROGATORY NO. 23:

Identify all grievances and/or complaints which you filed pursuant to any provisions set forth in any collective bargaining agreement and/or any provisions of Defendant Board's Rules and/or any Board procedures and state the dates on which such grievances and/or complaints were filed and the outcome of such grievances and/or complaints.

ANSWER:

INTERROGATORY NO. 24:

Have you ever been convicted of any offense other than a traffic violation? If so, please state the offense(s) for which you were convicted, the court(s) in which you appeared, and the corresponding dates of the conviction(s).

ANSWER:

INTERROGATORY NO. 25:

State whether plaintiff or plaintiff's attorneys or agents or anyone acting on plaintiff's behalf has taken any statements, signed or unsigned, oral or written, or has in their possession any such statements, or know of the existence of any such statements, from or by any person who has, or claims to have, knowledge of the facts concerning the matters alleged in plaintiff's Complaint; if so, state:

- a) The name and present or last known address and phone number of each such person;
- b) The date the statement was given;
- c) Whether the statement was oral or written; and
- d) Whether plaintiff has a copy of each statement. Pursuant to Rule 34 please produce a copy of each such statement with plaintiff's answers to these interrogatories.

ANSWER:

INTERROGATORY NO. 26:

State the name, address and telephone number of any and all expert witnesses plaintiff either expects to call at trial or will call at trial and specify the basis and nature of each expert witness' testimony. With respect to expert witnesses, state the following:

- a) The subject matter on which the expert is expected to testify;
- b) The substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion; and
- c) State whether plaintiff has any written reports from each expert. If yes, please produce a report from any and all expert witnesses which may have been retained by you in compliance and pursuant to Fed. R. Civ. Proc. 26 (b) (2) (B) and 34.

ANSWER:

INTERROGATORY NO. 27:

Identify all sources of income you have had since June 2008, including income from employment outside Chicago Public Schools.