

IN THE COURT OF COMMON PLEAS OF
YORK COUNTY, PENNSYLVANIA

Stephen Beaver, Leah Cooper,) Civil Action - Law
Amy Elliott, John Elliott,) No. 2024-SU-001322
Jeff Harmon, Tara High,)
Katherine Jan Jarrett,)
Jesse Sayre, and Jane Vivier,)
Plaintiffs)
VS)
Board of School Directors)
of the West Shore School)
District, Heidi Thomas,)
Kelly Brent, David Brinton,)
Brenda Cox, and Mandy Davis,)
Defendants)

--oOo--

DEPONENT: Mandy Davis
TAKEN BY: Plaintiffs
DATE: Tuesday, January 28, 2025
TIME: 2:12 p.m.
PLACE: Ream, Carr, Markey, Woloshin &
Hunter, LLP
119 East Market Street
York, Pennsylvania
REPORTER: Angela Kilby
Court Reporter, Notary Public

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14 ALSO PRESENT:

15 Jeff Harmon
16 Tara High
17 Brenda Cox
18 Kelly Brent
19 Brian Guistwhite

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8 (No exhibits were marked.)

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1 STIPULATION

2 It is hereby stipulated and agreed by
3 and between counsel for the respective parties
4 that the deposition is being taken for
5 discovery; that reading, signing, sealing,
6 certification, and filing are waived; that all
7 objections, except as to the form of the
8 question, are reserved to the time of trial.

9 * * * *

10 MANDY DAVIS,

11 called upon by Plaintiffs to give testimony, being
12 duly sworn or affirmed by me, testified as follows:

13 * * * *

14 EXAMINATION

15 BY MR. ELLIOTT:

16 Q. Good afternoon, Ms. Davis. I am John
17 Elliott, I am the attorney representing
18 plaintiffs in this matter.

19 You are represented here today by
20 Attorney Josh Bonn, correct?

21 A. Mm-hmm. Yes.

22 Q. Have you ever -- for the record, can
23 you please give your name and address?

24 A. Mandy Davis. 448 Old State Road,
25 Lewisberry.

1 Q. Have you ever given a deposition
2 before?

3 A. No.

4 Q. I'll briefly go over the ground rules
5 for the deposition before we get started.

6 Obviously you are under oath, subject
7 to the penalties of perjury, just as though we
8 were in court. Your duty is to tell the truth
9 to the best of your recollection.

10 I need to ask you questions that you
11 can hear and understand. If at any time you
12 don't understand the question, please ask me to
13 repeat it or rephrase it. Otherwise, if you
14 answer, we'll presume that you have heard and
15 understood the question.

16 Do you understand that?

17 A. Yes.

18 Q. And a written transcript is being
19 taken down by the stenographer today. So, your
20 responses need to be verbal as opposed to shakes
21 of the head, nods, gestures. Okay? Do you
22 understand that?

23 A. Which is what I like to do a lot.

24 Q. We'll try to remind you if you fall
25 into that.

1 If at any time you need to take a
2 break or speak to your counsel, that is fine.
3 Let us know and we can pause.

4 A. Okay.

5 Q. Do you have any questions about the
6 process?

7 A. No.

8 Q. What is your educational background?

9 A. Bachelors degree.

10 Q. When did you get that?

11 A. Oh, golly. You are going to make me
12 think.

13 Well, I think I graduated in 2003.

14 Q. Okay. Where did you graduate from?

15 A. Baptist Bible College.

16 Q. Where is that located?

17 A. Clarks Summit.

18 Q. Is that here in Pennsylvania?

19 A. Yes.

20 Q. What is your employment history?

21 A. Oh, okay. From when?

22 Q. Starting after college.

23 A. After college?

24 Q. Yeah.

25 A. I worked with a place called

1 Lordsmont. Right after -- well, during college
2 and right after college, which was basically a
3 juvie home for troubled girls from out of
4 Philly, sometimes -- mostly out of Philly.

5 That became, like, extremely high
6 stress, and then they had a position open to
7 where I could work with kids in the middle
8 school that would be on the verge of needing to
9 be sent to a juvie-type situation. So, I worked
10 in -- I believe it was a Scranton School
11 District for maybe a couple years before I
12 married my husband.

13 Then we moved to Denver, Colorado. I
14 got a job as a bank teller there, and I loved it
15 because it wasn't as high stress. Then I had
16 babies and I stayed at home with them and I
17 would do odd things here and there to just help
18 get extra money. One door would close, another
19 would open. And currently I run my own business
20 cleaning houses.

21 Q. How long have you been engaged in your
22 own business?

23 A. I don't know, maybe three years.

24 I am going to put this on the line
25 right now. I am terrible with dates. I am

1 lucky I remember my kids' birthdays. So, like,
2 I feel like my daughter asked me this morning or
3 last night when we bought our house. It was
4 actually when did we flip a house. And I was,
5 like, I have no idea. I can't remember. I have
6 to think really hard.

7 So, if you are asking me for years, I
8 don't know why, it all starts to blur after --

9 Q. Okay. All right. Well, I'll test
10 your recollection a little bit with the next
11 question.

12 When were you elected to the school
13 board?

14 A. Oh, well, about a year ago. So, 20 --
15 okay, 2023.

16 Q. Okay. So, you came on approximately
17 December of last year?

18 A. Our reorganization meeting was the
19 first Tuesday of December of that year of the
20 election.

21 Q. So, you came on the same time as Ms.
22 Brent?

23 A. Yes.

24 Q. Prior to the election, did you have
25 any prior experience serving on any sort of

1 municipal or government boards or agencies?

2 A. Yes.

3 Q. What experience did you have?

4 A. I served as the recording secretary
5 for Mount Wolf Borough for maybe six -- I don't
6 know. Maybe eight years. Six to eight years.

7 Q. Okay.

8 A. It was a good little stint.

9 Q. What did you do as the recording
10 secretary?

11 A. I answered -- so, it is a really small
12 town. So, it is not like you have to be in the
13 office, which was perfect for me. So, I would
14 go down once or twice a week, check voicemails.
15 If there were right-to-knows, I would get them
16 to the correct people so they were fulfilled in
17 time. Opened mail, give it to the right person,
18 take the minutes, file things that would need
19 filed. Ran a Facebook page.

20 I think that is about it.

21 Q. In that capacity, did you have any
22 responsibilities with regard to the -- for the
23 budget for the municipality?

24 A. Nope.

25 Q. That job with Mount Wolf, was that the

1 only experience with municipal or government
2 bodies?

3 A. I think so. I can't think of anything
4 else.

5 Q. Have you had any training relating to
6 the Sunshine Act or the right-to-know laws since
7 you have come on the board?

8 A. Yes.

9 Q. What training have you had?

10 A. The PSBA-1. Probably -- it was pretty
11 quick after being elected. That was, like, a
12 five-hour required one. In fact, I think we are
13 supposed to keep freshening up every year.

14 And we had one, like, separately with
15 Stock and Leader with Brooke. But don't ask me
16 when that was.

17 Q. Okay.

18 A. Because I don't -- everything, like --
19 timelines blur to me.

20 Q. The one with Stock and Leader, was
21 that a meeting in person somewhere?

22 A. No, we all got together for that.
23 Like, we went and met where we have our
24 executive meetings. We all had a meeting in
25 regard to that. I don't know if it was a

1 meeting. It was, like, a training.

2 (Brian Guistwhite entered the room.)

3 BY MR. ELLIOTT:

4 Q. Right. But you did it in person at
5 the school district offices?

6 A. Yes, mm-hmm.

7 Q. In approximately -- were you present
8 for Ms. Brent's entire deposition?

9 A. Yes.

10 Q. Okay. We talked there about in
11 approximately January there was an RFP ad hoc
12 committee formed to look into potentially doing
13 a request for proposal for legal services,
14 correct?

15 A. Mm-hmm, yes.

16 Q. Did you have any involvement or input
17 with that committee in any way?

18 A. No.

19 Q. Did anyone talk to you about what went
20 on in those meetings?

21 A. No.

22 Q. And did you affirmatively try to give
23 any input or information to anybody who was on
24 that committee?

25 A. No.

1 Q. What was your first contact with Kevin
2 Hall?

3 A. I believe it was a phone call.

4 Q. Okay. Do you remember approximately
5 when that was?

6 A. Hmm-mm, I don't.

7 Q. Okay. How -- did he call you?

8 A. I think he called me. I can't
9 remember. I could have called him and left a
10 voicemail. But I don't remember if it was the
11 other way around.

12 Q. All right. Do you -- prior to this
13 call occurring, did you know who he was?

14 A. Nope.

15 Q. All right. Did you -- what is your
16 recollection of how the call happened? Like,
17 did -- for instance, did Ms. Brent tell you she
18 had already spoken to this person?

19 A. She told me about him.

20 Q. Okay. What did she tell you about?

21 A. Just that he had reached out to her
22 and she thought that it was interesting and that
23 he had questions about our district. And then
24 that is where it went.

25 Q. Okay. So, during your first call with

1 him, what did you discuss with Attorney Hall?

2 A. Well, there had been a lot of things
3 going on in our district that I had never dealt
4 with before. The most I had ever dealt with the
5 Mount Wolf Borough was feral cat people. And
6 that was -- we thought that was, like, crazy.

7 So, things that were going on after
8 every meeting I would process, because it takes
9 me awhile to process things. And I would be,
10 like, is this even normal? Am I seeing things
11 the right way?

12 So, I thought it was nice to talk to
13 another attorney and just pick his brain and
14 say, like, is this normal way of acting? Am I
15 crazy?

16 That's pretty much for me at that
17 point I needed to process. I thought that was a
18 great opportunity to just process with someone.

19 Q. Okay. When you talk about things
20 going on, what are you referring to?

21 A. Like, there was a lot of accusations
22 being thrown out at us, coming to meetings and
23 not expecting -- like, wondering how people knew
24 about certain things that were going on that
25 shouldn't have been known. And then, like,

1 constituents coming in, and, like, bringing
2 those things up.

3 Oh, my gosh. Just a lot.

4 Q. Can you give me example of something
5 people knowing about something going on that
6 they shouldn't have known about?

7 A. I cannot give you a specific example,
8 except that there was a time when something was
9 in board notes, and our board notes are
10 confidential. It says right on top,
11 confidential document. And we were getting
12 e-mails in reference to something that was in
13 that board notes. And I was, like, someone on
14 the board is leaking this out, or letting
15 constituents know about this.

16 And, so, I brought it up in executive
17 session and said why is this happening when it
18 says up top that it is confidential. This
19 shouldn't even be coming to us. And they --
20 there was some excuse made.

21 Q. Do you remember what the topic was
22 that was leaked?

23 A. Part of me wonders if it was the
24 Byrnes, because that was like a hot topic. But
25 I can't -- that is -- I am speculating on that

1 one.

2 Q. When you say the Byrnes, what was
3 that?

4 A. That Byrnes Health thing. The -- oh,
5 golly. The Byrnes Health Group -- is that what
6 they are called? I can't even remember. That
7 we contracted to teach the Grow and Know hygiene
8 for the fifth graders. So, that was, like, a
9 big huge blow up in the district.

10 Q. How many -- did you ever meet in
11 person with Attorney Hall prior to April 11 of
12 last year?

13 A. Uh-huh.

14 Q. How many times did you meet with him?

15 A. I went with Kelly the first time, and
16 then the second time I went with Brenda, because
17 she asked me to and I said I would.

18 Q. Was that at Attorney Hall's office?
19 Where did you meet?

20 A. Attorney Hall's office.

21 Q. So, the first time that you met with
22 Kelly at Attorney Hall's office, do you remember
23 approximately when that was?

24 A. No.

25 Q. Do you think it would have been

1 sometime in March of last year?

2 A. Probably.

3 Q. Okay. What did you discuss with
4 Attorney Hall at that meeting?

5 A. I don't remember. I probably
6 processed again.

7 Q. So, your recollection is you were
8 talking to him about what you were experiencing
9 on the board?

10 A. 100 percent.

11 Q. Did you ask any questions to him
12 about, for instance, his qualifications to be
13 solicitor?

14 A. No.

15 Q. Or anything like that?

16 A. No.

17 Q. Other than talking about processing
18 your own experiences, was there anything else
19 that you recall speaking to Attorney Hall about
20 at that first meeting?

21 A. No.

22 Q. Okay. What about the time you met
23 with -- that is Brenda Cox, I am presuming?

24 A. Yes.

25 Q. Do you recall when that meeting took

1 place?

2 A. No.

3 Q. Okay. What did you -- what happened
4 at that meeting? What was discussed?

5 A. Same stuff. Same kind of -- just
6 processing.

7 Q. Okay. And did you learn anything more
8 about Attorney Hall's experience or
9 qualifications relating to education law or
10 school board representation?

11 A. No.

12 Q. So, so far we have talked about the
13 initial call, two meetings.

14 Did you have any other meetings or
15 calls with Attorney Hall prior to April 11?

16 A. Not that I recall.

17 Q. Okay. Did you speak to -- outside of
18 the presence of Attorney Hall, did you speak to
19 any of the other board members about Attorney
20 Hall prior to April 11?

21 A. Well, I went home and talked with
22 Kelly, because she called me. And -- talking
23 about him to any other board members, I would
24 say no.

25 Q. Okay. When you say you talked to

1 Kelly, are you talking about the --

2 A. The initial.

3 Q. -- your initial contact where she
4 basically told you who he was?

5 A. Yes.

6 Q. All right. And that was -- was that
7 before you had spoken to Attorney Hall for the
8 first time?

9 A. That would have been before, correct.

10 Q. All right. So, those were the only
11 direct communications you had with Attorney Hall
12 prior to the April 11 meeting?

13 A. I believe. I mean, I would have had
14 to call to set up an appointment with Brenda.
15 But that would have been the only other --

16 Q. So --

17 A. So, that would have been a separate
18 phone call.

19 Q. All right. What -- so, prior to the
20 April 11 meeting, what was your understanding of
21 Attorney Hall's experience relating to school
22 board representation or education law?

23 A. Well, I really didn't have a lot of
24 information on that.

25 Q. Okay.

1 A. I thought that he -- I mean, I heard
2 that he had experience, because his firm did.
3 So --

4 Q. Who told you that his firm had
5 experience?

6 A. I think Kelly told me that.

7 Q. Other than that, did you have any
8 other means of assuring yourself that he was
9 qualified to be the solicitor?

10 A. No, I didn't do -- no.

11 Q. Okay.

12 A. Just all what I told you.

13 Q. Did you talk to any other attorneys
14 about potentially being a new solicitor?

15 A. No.

16 Q. Did you think the board should explore
17 other possibilities other than Attorney Hall
18 before making a decision?

19 A. I was near here nor there on that
20 decision. Like, I was -- I was going with what
21 our president and vice president would choose to
22 do.

23 Q. So, were you relying on the president
24 and the vice president to look into those
25 matters and you were just going to trust their

1 judgment?

2 A. At that time, yeah. In regards to all
3 that.

4 Q. So, did you come to -- other than you
5 said relying on what either Ms. Thomas or Ms.
6 Brent said, did you independently come to any
7 conclusions about whether Attorney Hall was
8 qualified to be the solicitor?

9 A. I came to a conclusion during the
10 April 11 meeting.

11 Q. Okay. What led you to come to a
12 conclusion?

13 A. Well, there was a lot of things that I
14 had to weigh and think about. That was a very
15 long meeting. It was a very stressful meeting.
16 And I really wasn't sure what the right thing to
17 do was at that moment. And I had to pray about
18 it before I gave my answer.

19 And when I deducted things, I decided
20 that would be the best thing to do.

21 Q. Okay.

22 A. It was literally when they called my
23 name. And I froze because I was, like, I don't
24 know what to do. But then I made my decision.

25 Q. Okay. What led you to believe that

1 was the right decision?

2 A. I had to weigh in all the things that
3 had happened in the past. And I did think that
4 we were misrepresented in certain areas with
5 Brooke Say. And that came to mind. And I
6 didn't always feel like we were being
7 represented fairly, especially after what
8 happened with the Byrnes statement. And that
9 kind of really opened my eyes to that.

10 Q. Okay. When you said you felt
11 misrepresented -- when you are talking about the
12 Byrnes statement, is that the statement that Dr.
13 Stoltz made publicly you referred to?

14 A. 100 percent.

15 (Brian Guistwhite left the room.)

16 BY MR. ELLIOTT:

17 Q. That was essentially that -- well, I
18 don't want to put words in your mouth. What was
19 your recollection of what Dr. Stoltz said that
20 was objectionable?

21 A. The phrase lack of decorum was said in
22 that statement to the press. And in executive
23 session I had said I do not like that phrase, it
24 is throwing our board members under the bus and
25 I would like it to be worded differently.

1 To that, he refused to do that. And I
2 was not happy to be refused when I am a board
3 member and I am looking out for us and he did
4 not even try to reword it differently.

5 Then our attorney was sitting there --
6 because when I made that statement, other board
7 members chimed in and said I agree, I do not
8 like that statement as well. And she should
9 have spoken up and said maybe this should be
10 worded differently.

11 She is an attorney. She knows how to
12 word things. She is trained to do that. And
13 she could have helped reword that so it didn't
14 come across the way it did. Because I knew when
15 that went out, it was going to hit the public,
16 and we were going to get all the fire for it.
17 And we did. And I was not happy about that at
18 all.

19 Q. Were you present at the meeting with
20 the Byrnes Group?

21 A. I was not.

22 Q. Other than that incident where you
23 said Attorney Say should have spoken up and she
24 didn't, were there any other instances in your
25 view where Attorney Say say did not represent

1 the board properly in some way?

2 A. There were things that they may come
3 up to me after I called out something in the
4 contract that I didn't like, I felt like it was
5 an overreach for Byrnes to ask of medical
6 records of the children. And I had said I
7 didn't like that in the meeting and I was taken
8 to the side afterwards and told that I should
9 not do that in a meeting, that I should call her
10 or call someone prior to that.

11 And I was, like, well doesn't that --
12 isn't that the purpose of bringing things into
13 the Sunshine Law so the public can know that
14 this is what's going on and we are doing what
15 they asked us to do in representing them as --
16 due diligence. In doing my due diligence.

17 So, those were things that I was not
18 fond of as well.

19 Q. When you say -- was the person who
20 pulled you aside Attorney Say or was that
21 somebody else?

22 A. Two people.

23 Q. Who was it?

24 A. First Matt Gay, and then she came to
25 me separately.

1 Q. Okay. Who was it they thought you
2 should not have said in the meeting?

3 A. Well, they did not know that phrase
4 was in the contract, so I don't think they liked
5 that I called it out and it caught them off
6 guard. But that means I read through it and
7 caught something that stood out to me that I
8 didn't like.

9 And in the meeting they were, like,
10 that is not in there, and I was, like, yes, it
11 is. And I found it.

12 Q. Are there any other specific instances
13 you can recall where you thought either Ms. Say
14 or Stock and Leader generally was not --

15 A. At this point, no.

16 Q. Okay. So, in your meeting or
17 discussions with Attorney Hall prior to April
18 11, did you ever discuss with him any specific
19 policy goals for the school board or things that
20 you wanted to achieve on behalf of the board?

21 A. No.

22 Q. Do you know if he is associated with
23 any political organizations?

24 A. No.

25 Q. Since that time, have you found out --

1 are you aware if he has -- become aware of him
2 being a member of any?

3 A. I actually just asked someone a few
4 days ago if he was affiliated with anything, and
5 I thought the answer was the Cumberland --
6 something with Cumberland County Republican
7 something. So -- but I don't know. I just
8 found out the other day he is apparently
9 president of the Cumberland Library.

10 Q. Okay. But some sort of Republican
11 organization for Cumberland County?

12 A. Something, yes. I don't know what he
13 does.

14 Q. All right. Did you ever talk to Heidi
15 Thomas about your impressions of Attorney Hall
16 in any way?

17 A. I said he had nice hair. Because he
18 does.

19 Q. Okay.

20 A. He has, like, really nice hair. But,
21 no. I don't recall talking about any
22 impressions that I would have had of him.

23 Q. Did you --

24 A. It is hard to get to know someone in a
25 brief meeting of sorts.

1 Q. Do you think you had enough time to do
2 your due diligence, to find out whether Hall --
3 Attorney Hall would be appropriate for the
4 solicitor?

5 A. I believed that he could be competent
6 of it. When I think about it throughout the
7 meeting and what the solicitor is hired for, and
8 our policy states the solicitor is hired for the
9 pleasure of the board, in that meeting I would
10 have concluded that Brooke was not conducting
11 herself in the pleasure of the full board. And
12 I was hopeful by the end of that meeting that
13 the change in hands in that particular position
14 would look differently, that he would be
15 objective and no nonsense and serve for the
16 entire pleasure of the board.

17 So, that was one of my conclusions
18 when I made my decision when it I came time to
19 vote.

20 Q. Okay. So, what -- at the time you
21 voted, what were your priorities and what did
22 you think was the most important aspect that
23 Attorney Hall might be able to fulfill?

24 A. I wanted to be able to trust my
25 solicitor.

1 Q. Okay. And what gave you the
2 confidence you could trust him?

3 A. I don't know that I had 100 percent
4 confidence at that time. Like I said, I had to
5 really weigh my options at that moment on what
6 was the right decision.

7 So, at that point, for me, he was
8 better than Brooke.

9 Q. You were aware that prior to this,
10 that the RFP committee had been meeting with the
11 intent of putting out a request for proposal to
12 get multiple possible applications for
13 solicitor, correct?

14 A. Mm-hmm.

15 Q. When did you find out that was not how
16 the solicitor was going to be selected?

17 A. When did I find out? When he was
18 being put on the agenda.

19 Q. Okay. So --

20 A. Because I did ask. Like, I wanted to
21 make sure that everything was done well and not
22 wrong.

23 Q. When did you find out that he was
24 being placed on the agenda?

25 A. Oh, goodness. Probably when they were

1 going to build the agenda. Whenever that is.

2 Whether that is a week or the week of.

3 Q. Okay. I think the testimony earlier
4 was that it is usually two or three days prior
5 to the meeting when the agenda meeting occurs.

6 Is that your understanding?

7 A. That would be my -- yeah. Yep.

8 Q. All right. Were you surprised that
9 they were no longer pursuing an RFP at that
10 point?

11 A. At that point, nothing surprises me
12 anymore because there was so much stuff. Like,
13 this has been a whirlwind of a -- no one could
14 have ever prepared me for this position.

15 Q. Did you think it was a good idea to
16 abandon the RFP process?

17 A. There were some things that gave me
18 pause when it was explained by Mr. Guistwhite in
19 executive session that made me wonder if it was
20 a good idea the way it was going.

21 So, I don't know that I would have --
22 I saw it both ways. I could see how it could go
23 this way, I could see how it could go that way.
24 Either way, it is a crap show. So --

25 Q. Did you receive copies of the written

1 comments from residents that were submitted to
2 the board prior to the April 11 meeting?

3 A. We get e-mails.

4 Q. Right. Did you -- I think we talked
5 about in the previous deposition, there were
6 approximately 115 written e-mails that were at
7 least identified within the minutes that had
8 been provided to the board.

9 Did you receive those e-mails?

10 A. They come to my e-mail.

11 Q. All right. Did you get a chance to
12 read all of them prior?

13 A. No. There was no way.

14 Q. Did you read any of them?

15 A. Yes.

16 Q. Is it fair to say that most of those
17 comments expressed concern about the way the
18 solicitor was being selected?

19 A. Yes. They all said a lot of the same
20 thing.

21 Q. And is it fair to say most of those
22 comments suggested that the board ought to go
23 through an RFP process to be transparent in the
24 way things were going?

25 A. That is what they all stated.

1 Q. Okay. Did that give you any pause to
2 say maybe the board should be going about this
3 differently?

4 A. No, because -- well, no.

5 Q. Why not?

6 A. Well, I sit in meeting after meeting
7 and I have become very familiar with the same
8 people who e-mail. And, like, it is the same
9 group on either side. And I consider also the
10 constituents who voted us in and wanted change.
11 And 100 e-mails out of 7,500 or so, maybe more
12 constituents in the district, is, like, maybe --
13 it is a very low percentage. So, I have to
14 think about overall. So, I put that into
15 consideration as well.

16 Q. Do you believe --

17 A. And I am going to add this as well.
18 The solicitor works for the pleasure of the
19 board. The solicitor is not here for the
20 constituents. So, that, like -- that was
21 another thing.

22 Like, I am looking at all the options
23 and I am weighing it and thinking that through.
24 So, I do consider that, then I think about how
25 we were elected.

1 Q. Do you think the board was being
2 transparent in the way Attorney Hall was
3 selected as the solicitor?

4 A. They were transparent in adding it to
5 the agenda.

6 Q. Do you -- are you -- did you hear from
7 any of the four board members who voted against
8 Attorney Hall?

9 A. Did they talk to me? Is that what you
10 are asking?

11 (Kelly Brent and Brenda Cox left the
12 room.)

13 BY MR. ELLIOTT:

14 Q. Yeah. Did you hear from any of them
15 that they didn't know this was coming and they
16 never had an opportunity to speak to Attorney
17 Hall?

18 A. At that meeting they said that.

19 Q. Did it concern you that four of the
20 nine board members didn't know this was
21 happening until two or three days before the
22 meeting?

23 A. No, because it was put on the agenda.
24 They had time to look him up and they had all
25 these facts on him.

1 Q. What facts did they have?

2 A. The facts -- they said that he never
3 was the solicitor for school boards, that
4 everything is based out of Pittsburgh. I forget
5 what else they said. They knew all kinds of
6 stuff. So, they were looking him up.

7 They knew -- they, like, knew -- they
8 could have picked up the phone and called him,
9 reached out.

10 Q. So, if this had been the other way
11 around and you had been on the minority and not
12 told about a change for something as significant
13 as the solicitor, you would have thought that
14 process was fine for you not to hear about it
15 until two or three days before the meeting?

16 A. There were a lot of things like that
17 going on already. Like, we would go to meetings
18 and all of a sudden we are getting waylaid into
19 things that I wasn't expecting. So, I mean,
20 there were surprises all around.

21 Q. But is that okay? Aren't you supposed
22 to have time to reflect and --

23 A. One would think. But I guess things
24 roll.

25 Q. And you are okay with that?

1 A. It is not my favorite way of doing
2 things.

3 Q. Have you suggested things should be
4 done differently?

5 A. Yeah, I make suggestions.

6 Q. Do you think the board should engage
7 in an RFP process to select a solicitor?

8 A. Currently?

9 Q. Yeah, currently. Yes.

10 A. I think it would be good practice to
11 do it. Definitely not hold onto things for such
12 long periods of time.

13 Q. Is there any -- back at the meeting on
14 April 11, 2024, is there any reason that
15 decision couldn't be delayed so that either
16 board member -- other board members could have
17 an opportunity to interview him, or perhaps have
18 other candidates considered?

19 A. I think that process was trying to be
20 done.

21 Q. What is your understanding of -- are
22 you talking about the RFP committee?

23 A. Correct.

24 Q. All right. What is your understanding
25 of why that was abandoned?

1 A. I think from my understanding, Kevin
2 reached out to Kelly in a time where things were
3 spiralling even more than ever, and it seemed
4 like it is now or never. That is what I am
5 thinking. That is my speculation.

6 But I can't speak for what went down
7 in that RFP committee. I have my instinctual
8 thoughts of what I saw, but I wasn't ever in
9 there. Just things that would happen like I
10 already told you. So, that would be --

11 Q. So, is it your understanding that it
12 was Ms. Brent's decision to stop moving forward
13 with the RFP process?

14 A. Correct.

15 Q. Is it your understanding that she was
16 essentially the person advocating for Attorney
17 Hall to be chosen as the solicitor?

18 A. Advocating. That is an interesting
19 word.

20 Q. Or suggesting --

21 A. That would -- that would allude to she
22 was pushing for it and saying this is the guy.
23 Like, that is not how that went down at all.

24 Q. How did it go down?

25 A. Well, we told you how it went down.

1 She -- like, he called her, then she called me,
2 and I said, well, I'll go talk to him, because I
3 would love to talk to an attorney that -- and
4 then he was on the agenda. And it was going to
5 come out into the Sunshine where we could
6 deliberate about it or listen to everybody's
7 thoughts and ideas.

8 Q. Do you believe that deliberation
9 actually took place during that public meeting?

10 A. As much deliberation that could happen
11 in that kind of environment, yes.

12 Q. What do you mean by that?

13 A. It was very hostile environment, where
14 we sit through at least four hours of
15 constituents coming in and yelling at us and
16 telling us what awful, terrible people we are,
17 and then the four board members following suit.

18 It was a very, very hostile meeting,
19 it -- I never want to relive something like that
20 in my life again.

21 Q. Do you believe that the reasons for
22 terminating Brooke Say and hiring Kevin Hall
23 were stated during the April 11 meeting before
24 the vote took place?

25 A. Having not gone back and watched it

1 and trying to recollect in my mind what happened
2 so long ago, I do believe it was stated. I
3 believe Mrs. Brent stated it.

4 Q. What is your recollection of the
5 reasons that she gave?

6 A. See, that is a tough one. I am not
7 going to be able to just -- I am not going to
8 make up something.

9 Q. Did you share during that -- I am
10 trying to remember, because I haven't watched it
11 in a long time, either.

12 Did you share any of your own personal
13 beliefs or observations as to whether appointing
14 Solicitor Hall -- Attorney Hall as solicitor
15 would be a good idea?

16 A. Oh, no. I said nothing in that
17 meeting, because the wolves were out. And I was
18 not -- it was going to be pointless to say
19 anything at that point.

20 Q. Before the vote occurred, did you let
21 Heidi Thomas know how you intended to vote?

22 A. No.

23 Q. Had you indicated at any time that you
24 were confident with Ms. Thomas' and Ms. Brent's
25 judgment and that you would go along with what

1 they wanted to do?

2 A. So, you are asking -- can you repeat
3 that? Because that was a very long, kind of
4 two-point question.

5 Q. Did you ever tell either Heidi Thomas
6 or Kelly Brent that you trusted their judgment
7 and you would be willing to go along with what
8 they thought was best?

9 A. No.

10 Q. You agree there was never an executive
11 session prior to April, other than maybe the
12 executive session that occurred immediately
13 prior to the meeting, you never had a prior
14 executive session where the appointment of
15 Attorney Hall as solicitor was discussed?

16 A. No.

17 Q. All right. Prior to April 11, his
18 name had never been brought up at any other
19 public meeting as someone who is being
20 considered?

21 A. Hmm-mm.

22 Q. And you kind of made a hmm-mm. Was
23 that a no?

24 A. Oh, I'm sorry. No.

25 Q. For purposes of the steno, verbal

1 answers. All right.

2 A. You can't write mm-hmm?

3 THE COURT REPORTER: I can, but --

4 MR. BONN: She can, but sometimes --

5 THE DEPONENT: I'm just kidding.

6 MR. BONN: -- we don't know what you
7 meant.

8 BY MR. ELLIOTT:

9 Q. I would like to show you -- we'll use
10 the marked exhibits. I think it is No. 4.
11 We'll show you what we marked as Exhibit 4.

12 A. An e-mail?

13 Q. It is an e-mail exchange between Kevin
14 Hall and Brooke Say. If you could take a moment
15 to review that, let me know if you have ever
16 seen that before.

17 A. Yes.

18 Q. Okay. When is the first time you
19 remember seeing this?

20 A. My first time seeing this was when
21 Brooke attached it to an e-mail she sent the
22 board members.

23 Q. Okay.

24 A. I feel like it was stated as
25 confidential.

1 Q. Okay. Was that before the April 11
2 meeting took place?

3 A. Yes. This says April 5.

4 Q. But -- I'm sorry, the e-mail you got
5 from Brooke Say that attached this.

6 A. Oh.

7 Q. Did you get that --

8 A. Yes.

9 Q. Did you receive this before April 11?

10 A. It was before the meeting, yes.

11 Q. That is what I meant. Thank you.

12 In this, it states in the portion
13 that's from Brooke Say to Kevin Hall, it says
14 this confirms our conversation where you
15 informed me that you and your firm would be
16 appointed at the upcoming board meeting on April
17 11, 2024. You informed me that the President
18 Thomas asked you to take -- make this
19 communication about the appointment and that my
20 presence at the meeting was not necessary.

21 In response to my question, you also
22 advised that there had not been a board meeting
23 or executive session where appointment of your
24 firm as solicitor was discussed.

25 Did I read that correctly?

1 A. Now that you are reading that out loud
2 -- is she saying this is all the things that he
3 said on the phone?

4 Q. I'll represent to you that, yes,
5 between when they talked on the phone and the
6 e-mail that precedes it, that, yes, that is what
7 she is saying.

8 A. Interesting. Okay.

9 Q. Is this coming as news to you at the
10 moment?

11 A. Well, when you read it out loud, like,
12 I had read it very quickly the first time, and I
13 don't recall reading it -- but you know when
14 people read things out loud, you hear it
15 differently?

16 Q. Okay.

17 A. It just hit me that she is saying what
18 he had said over a phone conversation, not in
19 writing. So, she could have put words in his
20 mouth as far as I am concerned, then put it in
21 writing, that could have been brought to a
22 right-to-know request.

23 So, I don't know what exact words he
24 said on the phone to her. I just know he
25 replied to this e-mail right down here. So, I

1 can't --

2 Q. Just to be clear --

3 A. Am I misunderstanding something?

4 MR. BONN: He sent this e-mail and she
5 wrote this in response.

6 BY MR. ELLIOTT:

7 Q. The e-mail from Kevin Hall is dated
8 April 5, 4:16 p.m., and the e-mail from Brooke
9 Say is at 5:59 p.m. in response to what Mr. Hall
10 wrote.

11 A. Okay.

12 Q. Is that your understanding of this
13 e-mail chain?

14 A. Now I see it. But there is also a
15 phone conversation, am I correct?

16 Q. There is an also reference to a phone
17 conversation taking place, correct.

18 A. Okay.

19 Q. In the -- let's look at specifically
20 what was written in Mr. Hall's e-mail. It says,
21 thank you for our conversation earlier. As I
22 indicated, Heidi Thomas, president of the board
23 of school directors of West Shore School
24 District, asked me to reach out to you as a
25 courtesy to inform you that a change in

1 solicitor will be on the agenda for April 11,
2 2024 meeting.

3 With the goal of making the transition
4 as smooth as possible, we would appreciate it if
5 you should provide us with a list of the most
6 pressing issues facing the school district and
7 begin preparing transition paperwork for any
8 active matters that you or your firm are
9 currently working on.

10 We do not foresee a need for you to
11 attend the meeting on Thursday. However, if
12 there are any agenda items you feel we should
13 discuss prior to that meeting, please do not
14 hesitate to contact me on my cell below to
15 discuss. Thank you for your professionalism and
16 courtesy in making this a smooth transition and
17 feel free to call me any time.

18 Okay. Were you aware that Attorney
19 Hall had been authorized to contact Attorney Say
20 prior to the April 11 meeting?

21 A. I was not aware.

22 Q. Okay. Can you explain how Attorney
23 Hall could ask to start transitioning files on
24 April 5, prior to his having been appointed as
25 the solicitor?

1 A. No.

2 Q. Do you know why Ms. Thomas would have
3 authorized Attorney Hall to make this
4 communication if she didn't have confidence in
5 how the vote was going to turn out on the 11th?

6 A. No.

7 Q. Do you see how somebody reading this
8 could infer that perhaps there was a decision
9 already made prior to --

10 A. Absolutely.

11 Q. So, you understand why --

12 A. I would not have done that.

13 Q. So, if you weren't part of this
14 process, if you saw this --

15 A. I don't understand that.

16 Q. Right. You understand why somebody
17 would view this with suspicion?

18 A. But that is -- I never understood that
19 when I got -- when I saw this e-mail forwarded
20 to us. I am also not in the legal community.

21 Q. Right. I am strictly asking from your
22 perspective as a board member and a layperson.

23 A. As just a normal human being, no. I
24 was confused by that.

25 Q. Next I would like to show -- have you

1 look at what we marked as Exhibit 6.

2 Take a moment to look at this, but
3 I'll indicate that we marked this as Exhibit 6.
4 And this is a series of e-mails between or by
5 Kevin Hall and Heidi Thomas dated April 3 and
6 April 5, 2024.

7 After you have a chance to look at it,
8 can you let me know if you have ever seen these
9 e-mails before?

10 A. Did these come with attachments?

11 Q. Well, that is one of the things I was
12 going to ask you, if you remembered the e-mail.

13 A. I vaguely remember it.

14 Q. Okay. The April 3 e-mail looks like
15 it is from Kevin Hall to Heidi Thomas. It says,
16 good afternoon, Heidi. Please see the attached
17 business agenda items for the upcoming April
18 meeting.

19 Did I read that correctly?

20 A. That is the first page?

21 Q. On the first page.

22 A. Yeah, you are reading that correctly.

23 Q. On the second page dated April 5, it
24 says -- appears to say, good morning, Heidi.
25 Please see the attached, then it lists four

1 attachments, which were apparently supposed to
2 be included with the e-mail.

3 Then above that, good afternoon Todd.
4 Please distribute this entire e-mail as we
5 discussed last night to each of the board
6 members, sincerely Heidi Thomas. It looks like
7 it is including the e-mail from Kevin Hall.

8 A. Okay.

9 Q. Do you recall receiving this at some
10 point prior to the April 11 meeting?

11 A. Yes.

12 Q. Did you get -- there is four things
13 listed there, which is information about Tucker
14 Arensberg, Kevin Hall information sheet,
15 engagement letter, and business agenda items for
16 April 11, 2024 meeting.

17 A. Yes.

18 Q. Did you receive those four things?

19 A. That is why I asked about the
20 attachments, because it is one through four.
21 And now that we are discussing this, I
22 recollect.

23 Q. So, you do remember receiving those?

24 A. Yes, sir.

25 Q. Can you explain why Attorney Hall was

1 working on the agenda items for the April 11
2 meeting before he was formally confirmed as the
3 solicitor?

4 A. No.

5 Q. Would that be normal practice for
6 someone other than Attorney Say to be handling a
7 legal matter?

8 MR. BONN: Objection to form.

9 THE DEPONENT: What does that mean?

10 MR. BONN: You can go ahead and
11 answer, if you know.

12 THE DEPONENT: Okay. I don't know why.
13 Can you repeat? Because now I am confused.

14 BY MR. ELLIOTT:

15 Q. I'll rephrase the question. I'll take
16 baby steps, make it simpler.

17 Who would normally be responsible for
18 preparing agenda items for a meeting?

19 A. The president.

20 Q. Okay. All right. And if an agenda
21 item needed some sort of legal assistance, would
22 there be any other than Brooke Say prior to
23 April 11, 2024 who would work on that?

24 A. I don't know about this be legal
25 assistance. Was it?

1 Q. I don't know. Seems it came from --

2 A. It is really just giving information
3 about Tucker Arensberg and stuff, and then how
4 the business agenda -- like, what the agenda
5 would look like.

6 So, it was -- I mean, without me
7 seeing the entire e-mail again and looking at
8 the attachments, when I am looking at this the
9 way I perceive it, it was just giving all the
10 information to all nine board members, along
11 with what the agenda would look like with him --
12 I guess with him on it.

13 Q. All right. My question was, do you
14 know why Attorney Hall would have actually
15 prepared the agenda item as opposed to getting
16 the other information?

17 A. I can't answer that.

18 Q. And, again, do you see why an outside
19 person might view that with suspicion or wonder
20 how that could happen if it wasn't already known
21 that Attorney Hall was going to be appointed?

22 A. When you say outside person, what do
23 you mean?

24 Q. Somebody who is not a board member.
25 For instance, a member, a resident.

1 A. Oh, yeah. There is a lot of things
2 that happen that residents don't understand.
3 Heck, there was a lot of things I didn't
4 understand until I became a board member.

5 Q. Right. But specifically do you see
6 why somebody could look at that and think that
7 the decision must have already been made that
8 Attorney Hall would be appointed?

9 A. From this e-mail?

10 Q. Yes.

11 A. I don't know. I think if you read
12 through it and you don't quite understand
13 everything, possibly. I think the only thing
14 that is being the hang-up right now is the
15 business agenda item. And I -- like, I can't
16 even remember what I thought about it. I didn't
17 know if No. 4 seemed sketchy to me when I saw
18 the e-mail or if I was, like, okay, here is all
19 the information.

20 Like, I am still learning how all this
21 agenda stuff goes down and the time span of it
22 all. At this point in the game, like, we are
23 barely four months in. So, for me, I am just
24 going with the flow at that point, and it is not
25 even a really nice flow. It is a raging river.

1 Q. Did you speak to any of the other
2 board members about Kevin Hall prior to April
3 11?

4 A. Did you ask me that already?

5 Q. Yeah. I mean, other than the meetings
6 that you specifically attended.

7 A. No.

8 Q. Do you know who Thaddeus Eisenhower
9 is?

10 A. I have heard of him, and he has spoken
11 at a couple board meetings.

12 Q. Okay.

13 A. But I do not know him.

14 Q. Did you speak to him at any time prior
15 to April 11?

16 A. I have never spoke to him in my life.

17 Q. Do you have any idea how he might have
18 known prior to April 11 that Attorney Hall was
19 being considered for the solicitor position?

20 A. I have no idea.

21 Q. All right. Let's look at whatever the
22 last exhibit was. I believe it was No. 11.

23 I am showing you what is -- it is an
24 excerpt from the answer and new matter that was
25 filed by the district in response to this

1 complaint.

2 And Paragraph No. 54 says -- this is
3 an assertion being made on behalf of the school
4 district. Upon information and belief,
5 Plaintiff Stephen Beaver, Leah Cooper, Amy
6 Elliott, John Elliott, Jeff Harmon, Tara High,
7 Katherine Jan Jarrett, Jesse Sayre, and Jane
8 Vivier, have brought this lawsuit for the
9 illegitimate means of imposing their political
10 agenda on the West Shore School District,
11 regardless of how the majority of the duly-
12 elected board members voted.

13 Do you agree with that statement?

14 A. Yes.

15 Q. Okay. What is the political agenda
16 that the plaintiffs are trying to impose on the
17 board?

18 A. I believe that they are doing whatever
19 they can to ruin Kelly's chances of being
20 reelected. And the reasons I feel that way --
21 there are reasons I feel that way.

22 Q. What are those reasons?

23 A. The reasons I feel that way are
24 comments that had been made during board
25 meetings by Mr. Trone. He would say we will --

1 and this is me paraphrasing or giving an idea of
2 what was said -- but he would say, well, there
3 is going to be another election and you are not
4 going to be voted in, or things like that.

5 And during all of this time, Mr. Trone
6 and even Mr. Kambic were known to be fuelling
7 fires on their Facebook pages that were
8 politically -- like, it was almost like we were
9 still in a campaign and he was smearing
10 constantly. So, it is hard to walk away and not
11 think this is politically charged.

12 Q. You are talking about either
13 statements or Facebook posts by Mr. Trone and
14 Mr. Kamnbic, right?

15 A. Uh-huh.

16 Q. They were not plaintiff?

17 A. They would share each other's posts.

18 Q. All right.

19 A. It doesn't matter. Like, they are
20 feeding the flames, and these people follow
21 their pages and comment underneath. These are
22 the same people that come into the board
23 meetings and scream and yell at us.

24 Q. Okay.

25 A. So, I can deduct and reason and come

1 to that conclusion.

2 Q. Other than that conclusion, do you
3 have any evidence to support that the particular
4 plaintiffs in this case have brought the
5 complaint specifically for that purpose?

6 A. I do not have evidence myself.

7 Q. Okay. This indicates that the lawsuit
8 was brought for illegitimate means.

9 Do you have any evidence that any of
10 these specific plaintiffs are bringing this for
11 an illegitimate means as opposed to attempting
12 to enforce the Sunshine Act?

13 A. Can you rephrase that?

14 Q. Do you have any evidence that any of
15 the plaintiffs brought the case for illegitimate
16 means?

17 A. I do not have evidence that I could
18 hand you right at this second.

19 Q. Other than you describing that in your
20 words Mr. Trone and Mr. Kamnbic have made this a
21 politically charged issue, is there anything
22 else you are aware of that connects any of the
23 plaintiffs to some illegitimate or improper
24 reason for bringing a lawsuit?

25 A. So, you are asking me for evidence

1 again. I don't have evidence on me.

2 Q. Do you have any --

3 A. I have to re-up my --

4 MR. ELLIOTT: Okay. We can take a
5 break if you need to.

6 (Discussion off the record.)

7 BY MR. ELLIOTT:

8 Q. So, my question is, other than what
9 you stated about the general politically-charged
10 atmosphere, do you have any reason to believe
11 that any of the plaintiffs have brought the
12 lawsuit for an improper purpose?

13 A. Can you just say that one more time?

14 Q. Yeah. Do you have -- let me ask it
15 this way.

16 A. I am listening.

17 Q. What is the basis for your belief that
18 the plaintiffs are doing this not because they
19 are interested in enforcing the Sunshine Act,
20 but because they specifically are doing this for
21 either a political or some illegitimate purpose?

22 A. Because every time they come into a
23 meeting and talk to us, it is based on political
24 ideas. It is never -- like, it is always
25 politically-charged ideas. It is never about

1 something that is legitimately going on in the
2 school. It is always an attack on us.

3 So, I will stand by that, and I am
4 going to hold to it.

5 Q. Okay. Who specifically among the
6 plaintiffs have ever said something you thought
7 was an attack?

8 A. Every single one of them, minus I
9 don't know that I have ever seen Mr. Beaver, but
10 his wife comes in all the time and she will be
11 making statements all the time.

12 So, it is just there is this
13 atmosphere and presence that we are these awful,
14 horrible people that are going to take away all
15 the things. And then this happens and they are
16 going to take that moment to bring a lawsuit. I
17 think it is something called lawfare.

18 Q. So, can you specifically remember any
19 time Stephen Beaver made a statement that was an
20 attack and not talking about some legitimate
21 issue before the board?

22 A. I told you that I have never seen
23 Stephen Beaver. But his wife, Joey Beaver,
24 comes to the meetings very frequently.

25 Q. What has she said that was an attack?

1 A. Well, we were accused of -- oh, she
2 actually quoted a scripture in Luke that says
3 what happens in the darkness will be brought
4 into the light, and it is actually Jesus
5 speaking. And this was very early on. And I
6 said, wow, she is quoting scripture to us and
7 saying that we are doing dirty deeds in the
8 dark, and we are not. And it is funny she was
9 turning scripture against us.

10 So, I could -- like, that is an
11 example that I won't ever forget, because I know
12 my Bible. And will I come up with every other
13 thing I need to memorize from what the
14 constituents say to us, no. But I will not
15 forget faces, and I start to remember who comes
16 in and how they are going to come at us all the
17 time. And I start to figure out who is who.

18 And Miss Cooper, she is extremely
19 rude. She is insulting.

20 Q. What did she say that was rude or
21 insulting?

22 A. She has been very insulting about me.
23 She thinks that she can come in and say that I
24 no longer am new here, and if I stop doing that,
25 she has done her job and I have listened well to

1 her.

2 I am not a fool. I have been
3 belittled. My children have been belittled by
4 these people from the podium, and they don't
5 even know who my children are. They don't know
6 how my son has stood up to bullies at wrestling
7 tournaments when boys are moaning at girls and
8 he handles it. Because people just don't --
9 like, my kids stick up for kids who are being
10 bullied. But I get sat down -- I am told when I
11 am sitting down at a desk and serving my
12 community that I have terrible children who
13 don't like homosexuals or different people.

14 And I won't stand for that. And then
15 I get sued because they don't like how something
16 went down? I am going to say that is
17 politically charged.

18 Q. Are you lumping every person who has
19 made a negative comment in with the plaintiffs
20 as though they are connected?

21 A. No, I am not. But I remember people.

22 Q. Okay.

23 A. I am not going to sit there and
24 pretend that I don't know who everybody is. I
25 am going to go home and I am going to figure out

1 and realize who is who and what is going on.

2 And that is -- to me, that is not keeping your
3 head in the sand.

4 Q. All right. What about Amy Elliott?
5 What improper or illegitimate communications
6 have you ever gotten from her?

7 A. I don't know her. I am assuming she
8 is your wife.

9 Q. That is true. Have you ever received
10 any -- remember receiving any kind of comment
11 from her in any capacity?

12 A. No, because I don't think she
13 frequents the meetings very often.

14 Q. Okay. What about me? Have I ever
15 said anything in a meeting that you would
16 consider an attack?

17 A. I think that you have said things in a
18 meeting that was not correct information.

19 Q. What do you believe I said that was
20 not correct?

21 A. When something went down with Adam
22 Trone, it was, like, this drama on Facebook --
23 Facebook is full of drama -- and it came to the
24 school district and we were told the formation
25 of this new West Shore -- I forget what it is.

1 It is this new form committee thing -- there is
2 signs all over the place.

3 And we got an e-mail telling us we
4 needed to stand behind Adam Trone after he -- he
5 said something. It was outlandish. He did
6 something, actually. And two other people,
7 political people, came after him. I think he
8 poked the bear enough and they retaliated, and
9 then it blew up then we were told we needed to
10 stand up for him and something. And I was,
11 like, I am not standing up for someone who dug
12 his own hole.

13 And I recall you coming in saying that
14 we needed to do as such. And I was, like, no, I
15 am not going to stand up for someone or
16 apologize to him for something I never did.

17 So, those are -- like, that is the
18 kind of garbage that has been going on. If
19 anything, he owes us an apology for all crap he
20 has been posting all over Facebook and all the
21 drama. There, I said it.

22 Q. So, are you saying that any expression
23 of somebody who disagrees with the direction of
24 the board is an attack and it is illegitimate?

25 A. No. There is a way you can go about

1 it. There is a way that can be done that isn't.
2 But when you are fuelling it and it is a week
3 after week event and it goes -- the meetings are
4 going as late as possible, you start to wonder
5 what's going on. It doesn't take a genius.

6 Q. Who among the plaintiffs are
7 participating in some kind of illegitimate
8 attack?

9 A. Why does this have to continue on?
10 Like, this entire questioning?

11 MR. BONN: You have to answer.

12 BY MR. ELLIOTT:

13 Q. Because you haven't answered my
14 question yet.

15 A. Okay.

16 MR. BONN: You have to answer the
17 questions.

18 BY MR. ELLIOTT:

19 Q. I am trying -- you are claiming that
20 the plaintiffs, specific named plaintiffs, have
21 brought an illegitimate complaint. That is a
22 serious accusation. And I want to know your
23 basis for why you are saying the plaintiffs --

24 A. All right. Is there proof we violated
25 the Sunshine Law? Because we have been proven

1 guilty before being proven innocent, which is
2 totally backwards.

3 So, we can be -- like, we have been
4 accused of something that didn't happen, so to
5 me that is illegitimate. And to me that is
6 politically motivated. We live in a very
7 politically-motivated, charged society right
8 now, where this is happening all over the place.

9 Q. Okay. But my question is, what is
10 your basis for saying the plaintiffs brought an
11 illegitimate complaint?

12 A. I feel like I answered it.

13 Q. I think you answered that you felt the
14 board did everything right. I want to know what
15 your basis -- there is a difference -- do you
16 understand the difference between an accusation
17 being wrong and an accusation being essentially
18 intentionally false to start with?

19 A. Mm-hmm.

20 Q. All right. It is one thing to say
21 that allegations are incorrect and that you
22 didn't do what's being alleged. It is another
23 thing to say that the people bringing those
24 claims know it is false and the purpose behind
25 the complaint is illegitimate.

1 Do you recognize that distinction?

2 A. Mm-hmm.

3 Q. What is your basis for saying that the
4 plaintiffs -- they are not simply mistaken, but
5 they are knowingly bringing an illegitimate
6 complaint?

7 A. Well, I am making an assumption. That
8 would be my assumed deduction and reasoning.
9 So, if you want me to say that I have no proof
10 on that, then I can say I have no proof on that.

11 Q. Okay. We talked about -- nevermind.

12 MR. ELLIOTT: Is there any follow-up
13 that you want to do? Why don't you go ahead
14 with that.

15 EXAMINATION

16 BY MR. BONN:

17 Q. So, describe to ordinarily whenever
18 you are going to have a board meeting, is there,
19 like, an agenda and a board packet distributed
20 before the meeting?

21 A. It is on our agenda manager site.

22 Q. How much time do you get to look at
23 that before the board meeting?

24 A. I believe it is put up Thursday. But
25 I never remember about it until Monday.

1 Q. And when you say it is put up
2 Thursdays, are your meetings on Thursday?

3 A. It would be a week before. Like, a
4 week in advance.

5 Q. So, you ordinarily get one week
6 notice?

7 A. Yeah, mm-hmm.

8 Q. And how often is it that there are
9 actions on the agenda that you are expected to
10 take -- make a vote on that you don't have any
11 background on, you haven't overseen that?

12 A. All the time. I spend a ton of time
13 reading through stuff.

14 Q. So, it is very ordinary for you to
15 have one week to vote on things you have had --

16 A. Absolutely.

17 Q. -- let me finish my question.

18 A. Oh, I'm sorry.

19 Q. When you have had one week's notice
20 for?

21 A. Yeah.

22 Q. Whenever you vote at these meetings,
23 does the board -- well, let me ask this.

24 Do you give your opinion on every
25 single item that you are going to vote on

1 publicly before you vote?

2 A. No, not every single one.

3 Q. Does the board deliberate before it
4 votes on items ordinarily?

5 A. Not every single time. Are you
6 talking about in the board meeting?

7 Q. Yes, in the board meeting.

8 A. Yes.

9 Q. So, there is times during board
10 meetings where there is a vote by the board, but
11 there is absolutely no discussion about what you
12 are going to vote on before you actually vote?

13 A. Yes.

14 Q. That is -- is that common?

15 A. It happens more often than not. I
16 think we bring a lot more discussion than ever.

17 Q. Have you ever talked to -- prior to
18 April 11, did you talk to Dave Brinton about
19 Kevin Hall?

20 A. No.

21 Q. You didn't know how -- did you know
22 how any other board member was going to vote on
23 April 11 on the change in the solicitor?

24 A. No.

25 Q. When you looked at the e-mail between

1 Kevin Hall and Brooke Say, I believe this was
2 identified as Brent 5 -- or, actually, you were
3 looking at Brent 4.

4 Did you know there was a difference
5 between what Kevin Hall said to Brooke Say and
6 what she responded to him?

7 A. Not until today.

8 Q. But did you notice that today there
9 was a difference between what he said and what
10 she said?

11 A. Mm-hmm.

12 Q. What was that difference?

13 A. Oh, gosh. Now I have to read through
14 the whole thing again.

15 Okay. It is right now in the first
16 phrase where he says it is a courtesy to inform
17 you that a change in solicitor will be on the
18 agenda for April 11 meeting. She up here says
19 this confirms our conversation where you
20 informed me that you and your firm would be
21 appointed at the upcoming board meeting. But he
22 never said he would be appointed.

23 Q. You have worked with both Kevin Hall
24 and Brooke Say, correct?

25 A. Yes.

1 Q. Based on your interactions with them,
2 if there was that dispute between Brooke was
3 saying one thing and Kevin was saying another
4 thing, who would you trust telling the truth?

5 A. Kevin.

6 MR. BONN: Nothing further.

7 RE-EXAMINATION

8 BY MR. ELLIOTT:

9 Q. Sticking with No. 4 there. Do you
10 think --

11 A. Is that this? Or do I need to look at
12 this?

13 Q. Yeah. Do you think Brooke Say is
14 lying about what she talked about with Kevin
15 Hall?

16 A. Yes.

17 Q. Why do you think she is lying?

18 A. That is a great question.

19 Q. What is the answer?

20 A. Why would she? I don't know why she
21 would do this. Maybe to stir up angst, to get
22 emotions riled. I could conject why.

23 Q. What specifically do you think she is
24 lying about in that e-mail?

25 A. Well, she miss -- this is so typical

1 when you take someone's words and you twist
2 them. You can change one thing, like I just
3 saw, and it is a major change that makes it come
4 across that it happened in a different manner
5 than it actually did.

6 He didn't inform her that he was
7 appointed, because he wasn't appointed. He just
8 informed her that it was going to be on the
9 agenda, which I understand to be a courtesy
10 amongst the legal realm, which is a whole
11 different animal that I don't understand.

12 So, that is my thought on that.

13 Q. Okay. You do acknowledge Kevin Hall
14 acknowledges that there was a prior conversation
15 between the two of them, correct?

16 A. There was a phone conversation.

17 Q. Right.

18 A. That is why I discussed that with you
19 further. Because I was, like, wait, because I
20 noticed something was off. I was, like, I don't
21 know what was said on the phone and if she was
22 making something up about that.

23 Q. Is it possible Attorney Say is
24 including information that was discussed in the
25 phone call in addition to what Attorney Hall

1 wrote down after the fact?

2 A. So, are you asking me if that could
3 have been said in a phone call between the two
4 of them that wasn't on record?

5 Q. Yes.

6 A. How could I know that?

7 Q. All right. But I am saying, you are
8 not just saying you don't know what happened.
9 You just said you think Attorney Say is lying in
10 her e-mail.

11 A. Those words are different. So, she is
12 either painting a picture and attaching his
13 e-mail there that the words are specifically
14 there on what he said in that e-mail, but the
15 words -- she changed the word, the wording, in
16 her top e-mail. That was the first thing you
17 read before going down.

18 Q. How do know that Attorney Hall didn't
19 change or put a twist on what he said during the
20 conversation in his e-mail?

21 A. Maybe he did.

22 Q. All right. That is why I am asking.
23 How are you so sure that Brooke Say is lying
24 about what transpired between the two of them?

25 A. Well, I can't be for sure. But I know

1 that when I received that e-mail, it definitely
2 didn't sit well with me the way it was sent to
3 us. There was an entire e-mail, and there was
4 more to it. I think the confidential part must
5 not be included in that e-mail.

6 MR. ELLIOTT: All right.

7 MR. BONN: Just off the record for a
8 second.

9 (Discussion off the record.)

10 BY MR. ELLIOTT:

11 Q. So, when you are saying you were
12 uncomfortable with the way this was presented,
13 without getting into the details, but you are
14 referring to a separate e-mail from Attorney Say
15 that would be attorney-client privileged
16 communication?

17 A. Mm-hmm, yes.

18 Q. All right. My questions are specific
19 about this e-mail. Just to be clear, are you in
20 possession of any information that makes you
21 believe that -- or would support your belief
22 that Attorney Say was intentionally lying about
23 anything in this e-mail?

24 A. Am I in possession of something?

25 Q. Do you know of anything?

1 A. Yeah. We had another e-mail attached
2 to this letter that was confidential that had a
3 slew of things in there that I found to be
4 unprofessional.

5 Q. Is there anything that is not
6 privileged that you can give me as an example?

7 A. No, I can't. Short of going to my
8 e-mail and looking back through it. I am sure I
9 printed it out as well. It is at my house.

10 Q. But something that you think is
11 unprofessional in another e-mail, is that --
12 because you think she was being unprofessional
13 in another context, is that why you think she is
14 lying in this one?

15 A. That is why I feel like -- that is why
16 I think what she is saying in there is not
17 complete truth. Because I have other things
18 that I have read that will bring me to that
19 conclusion.

20 Q. Okay. What other things have you
21 read?

22 A. I can't tell you what they are because
23 they are not here and I can't read it verbatim
24 for you.

25 Q. Well, can you give me an example

1 generally what you are talking about?

2 A. Basically if you go through with this,
3 this is what will happen. That kind of stuff.

4 Q. Are you talking about legal advice you
5 were being given by Attorney Say?

6 A. Maybe it was legal advice. Probably.
7 Because it was attorney-client privilege. And I
8 found it to be threatening.

9 Q. Without going into the content of
10 anything you were given in an attorney-client
11 communication, is there something in that that
12 leads you to believe this is inconsistent with
13 something else she said?

14 A. I think she wrote that e-mail in
15 anger.

16 Q. This e-mail or the other one?

17 A. All of it. It all came in one e-mail.

18 Q. Did you ever talk to Heidi Thomas to
19 confirm that she authorized Kevin Hall to
20 communicate to Attorney Say?

21 A. I don't recall. I don't know if I did
22 or not. Even the time stamp, was that April 4
23 the e-mail came to us?

24 Q. Even just simply looking at what
25 Attorney Hall wrote, you are not questioning the

1 accuracy of anything that is in the April 5
2 e-mail that Kevin Hall wrote, are you?

3 A. I am not questioning that accuracy.

4 Q. Okay.

5 A. I am not questioning that.

6 Q. Okay. He doesn't -- it goes beyond
7 saying this is an agenda item. He says about
8 the goal of making the transition as smooth as
9 possible, we would appreciate it if you could
10 provide us with a list of the most pressing
11 issues --

12 A. Right.

13 Q. -- facing the school district and
14 begin preparing transition paperwork for any
15 active matters that your firm's currently
16 working on.

17 A. Yes.

18 Q. We did not see any need for you to
19 attend the meeting on Thursday, correct? I read
20 that correctly?

21 A. You read that correctly.

22 Q. Why, if this wasn't a foregone
23 conclusion, why wouldn't Attorney Say need to be
24 at the meeting?

25 A. Well, I could make assumptions on

1 that. I could do it because I am conjecturing.

2 Q. What would you conjecture?

3 A. I would conjecture that if all this
4 went down, it would save her -- I don't know if
5 embarrassment is the right word. But it is,
6 like, awkward. So, maybe there is a reasoning
7 in that and why that is a professional courtesy.

8 But I am not a lawyer and I don't work
9 -- like, I have never worked in the lawyer
10 world. But after the fact, I have learned and
11 come to the conclusion this tends to be the way
12 things go in the legal community.

13 Q. But if she didn't show up and the vote
14 went against replacing the solicitor, you would
15 have had this entire meeting without a solicitor
16 there, correct?

17 A. That would have been correct.

18 Q. Earlier when you said it is not
19 uncommon for you to vote on something with a
20 week or less notice that you have never seen or
21 discussed before; is that correct?

22 A. Mm-hmm, yes.

23 Q. All right. These aren't items that
24 have been previously discussed in some committee
25 meeting and then are coming up at a later --

1 A. No, no. Hmm-mm.

2 Q. You are saying --

3 A. There can be new contracts that we
4 need to read through, all kinds of things like
5 that. The MOUs. There is a lot of things that
6 -- there are sometimes there is, like, oh, my
7 goodness, a ton of contracts that might need to
8 be combed through in one agenda. And they are
9 not little contracts. We are talking -- some
10 can be as much as 17 pages. So --

11 Q. Have you ever felt that you didn't
12 have adequate time to prepare for a vote on an
13 item because of that short notice?

14 A. Well, it has always been a week. But
15 I do my best to take days out of the week when I
16 know I have those two weeks of board meetings to
17 sit down and really comb through those
18 contracts.

19 Q. Have you ever suggested that the board
20 should get more time to review these kinds of
21 items?

22 A. Passively, I have. But not formally.
23 Does that make sense?

24 Q. No. What do you mean by passively?

25 A. Maybe passively, like, couldn't we

1 have more time? Couldn't we have, like, 10 days
2 rather than a week. But it wasn't, like, I
3 don't know -- I kind of said that in passing.
4 Not, like, hey, can we sit down and really think
5 about this.

6 MR. ELLIOTT: Okay. Did that bring up
7 any follow-up for you?

8 MR. BONN: No.

9 MR. ELLIOTT: All right. I think we
10 are done with that. We get on with Mr.
11 Guistwhite.

12 (At 3:53 p.m., the deposition
13 concluded.)

14 * * * *

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1 County of Lancaster:

2 SS

3 Commonwealth of Pennsylvania:

4

5

6 I, Angela N. Kilby, Reporter, Notary
7 Public, duly commissioned and qualified in and
8 for the County of Lancaster, Commonwealth of
9 Pennsylvania, hereby certify that the
10 deponent/witness came before me, who was duly
11 sworn/affirmed by me to testify to the truth of
12 his/her knowledge concerning the matters in
13 controversy in this cause.

10

11 I also certify that the questions and
12 answers were recorded by me in stenotype, to the
13 best of my ability, and subsequently reduced to
14 computer printout under my supervision, and that
15 this copy is a true and correct record of the
16 same.

14 I further certify that I am not a
15 relative or employee of counsel or the parties
16 hereto. This certification does not apply to
17 any reproduction of the same by any means unless
18 under my direct control and/or supervision.

17

18 Dated this 11th day of February, 2025.

18

19

20



21

Angela N. Kilby - Reporter
Notary Public

22

Commission Expiration: June 2, 2027

23

24

25

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