

IN THE COURT OF COMMON PLEAS OF
YORK COUNTY, PENNSYLVANIA

STEPHEN BEAVER,) Civil Action - Law
LEAH COOPER, AMY ELLIOTT,) No. 2024-SU-001322
JOHN ELLIOTT, 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: Adam Trone

TAKEN BY: Plaintiffs

DATE: Monday, February 24, 2025

TIME: 3:32 p.m.

PLACE: Ream, Carr, Markey, Woloshin &
Hunter, LLP
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1 A. No.

2 Q. Okay. I'll take a moment to kind of
3 run through the ground rules of how this works.

4 Obviously you have just been placed
5 under oath. So, that is legally the same as
6 though you are testifying in court under the
7 subject of the penalties of perjury. Your duty
8 is to tell the truth to the best of your
9 recollection.

10 If you don't remember something, that
11 is fine as long as it is truthful. We don't
12 want you to guess or make something up. But if
13 there is something you can give an estimate of,
14 that is fine.

15 A. Okay.

16 Q. But otherwise, as long as that is
17 truthful, we don't want you to guess or make
18 anything up.

19 My duty is to ask you questions that
20 you can hear and understand. If at any time you
21 don't understand one of my questions, please ask
22 me to repeat it or rephrase it. I'll try to
23 make sure I ask it in a way you can understand.

24 A. Okay.

25 Q. Otherwise, if you answer a question,

1 we'll presume you have heard and understood the
2 question.

3 Do you understand that?

4 A. Sure, yes.

5 Q. The stenographer is taking down a
6 written transcript of everything we say here, so
7 your answers will need to be verbal.

8 A. Okay.

9 Q. It is difficult for a transcript to
10 accurately convey gestures or shakes, nods of
11 the head, that kind of thing.

12 A. Okay.

13 Q. If at any time you need to take a
14 break, speak to Attorney Bonn, anything like
15 that, just let us know.

16 Otherwise, do you have any questions
17 for me about the process here?

18 A. No.

19 Q. Okay. First, can you just briefly
20 give me your educational background?

21 A. Sure. I have an undergraduate degree,
22 bachelor's of science of education from
23 Millersville University in secondary social
24 studies education. I have a master's of the
25 arts degree in American history from

1 Millersville University as well.

2 Q. What years did you get those degrees?

3 A. My undergraduate would have been 2006,
4 and the graduate 2011.

5 Q. Since graduating, what is your
6 employment history since then?

7 A. I am a teacher at Dallastown Area
8 School District.

9 Q. That has been since 2011?

10 A. Oh, that has been since 2002. So,
11 this is my 19th year.

12 Q. Okay. So, you went back to school --

13 A. I was able to take classes while I was
14 teaching. I was taking night program, night
15 classes.

16 Q. Okay. Very good. What do you teach?

17 A. I have a social studies, so it is
18 American history, some economics, and a
19 financial management class.

20 Q. When were you elected to the school
21 board?

22 A. The fall of '23.

23 Q. Okay. So, this is your first --

24 A. First term, yes.

25 Q. -- term on the board.

1 Prior to that, did you have any
2 experience serving on any sort of municipal or
3 government boards or agencies?

4 A. No.

5 Q. Have you had any training related to
6 the Sunshine Act or right-to-know law?

7 A. Yes.

8 Q. What would that be?

9 A. We were invited to a PSBA-sponsored
10 new board member meeting. I am not going to
11 remember the date. But it was a half day
12 program broken down into four one-hour topics.
13 So, one of the four -- it would have been a one-
14 hour topic on it, a module on it, as well as the
15 board was invited -- it was optional, but it was
16 down in York. Stock and Leader hosted a -- I'll
17 call it half meet and greet, but half kind of
18 reminder of best practices. So, there would
19 have been a brief overview there, maybe 10 to 15
20 minutes on that night.

21 Q. You attended both of those?

22 A. I attended both of those.

23 Q. All right. In approximately January
24 of 2024, a request for proposal for legal
25 services was presented at one of the public

1 meetings.

2 Do you recall that?

3 A. I do, yes.

4 Q. Subsequent to that, a committee was
5 actually formed to create an RFP; is that
6 correct?

7 A. What do you mean subsequent? After?

8 Q. Yeah. There was -- my understanding
9 is initially Kelly Brent presented an RFP
10 initially to act on it at that meeting in
11 January?

12 A. That's correct, yeah.

13 Q. That was not -- that particular RFP
14 was not acted upon; is that right?

15 A. No. Yeah, that would not have been
16 acted upon.

17 Q. So, sometime after that --

18 A. That's correct.

19 Q. -- the board agreed to form a
20 committee?

21 A. Correct.

22 Q. Did you have any involvement giving
23 any input to that committee?

24 A. I did not, no.

25 Q. Did you speak to anyone who was on the

1 committee about what went on during that
2 process?

3 A. No, not during that time.

4 Q. How did you first become aware that
5 Kevin Hall was going to be considered as the
6 solicitor?

7 A. It was a phone call from Mrs. Thomas
8 on Friday. And I am not going to remember the
9 dates. But I remember I missed a phone call
10 from her because I was teaching. I want to say
11 that phone call came in at maybe 2:40-ish. And
12 it might have been a voicemail saying please
13 call back. I called her at 2:50 when my
14 students end. That is where she said that we
15 are going to be having Mr. Hall as our solicitor
16 up for vote.

17 Q. Did you know who she was talking
18 about?

19 A. Yes.

20 Q. Did you -- prior that phone call, did
21 you know that -- well, prior to receiving that
22 phone call, what was your understanding about
23 how a new solicitor was going to be selected?

24 A. My understanding it was going to work
25 through the committee that was established.

1 There would be a rubric evaluation system and
2 that a recommendation would flow from the
3 committee to the entire board.

4 Q. Is that your understanding of how that
5 process worked previously --

6 A. No.

7 Q. -- when --

8 A. I'm sorry.

9 Q. -- previously when Stock and Leader
10 was appointed?

11 A. I really would have no basis to
12 answer. That was the process that was
13 established. But since I really didn't
14 communicate with anybody during it, I am not
15 sure how it was done beforehand.

16 Q. Okay. So, I think you touched on this
17 a little bit in your last answer. But what was
18 your understanding of what the RFP process was
19 and what it was supposed to accomplish?

20 A. My understanding was that we put out
21 an RFP that the committee as a whole was able to
22 put together the RFP with what are we looking
23 for, maybe based on previously used templates.
24 I don't know. That was probably discussion that
25 happened in committee.

1 But my understanding was that they
2 would release an RFP, they would solicit
3 feedback and work through that, developing a
4 rubric along with administration to vet the
5 potential candidates down to however many they
6 want to have for an interview, or something like
7 that.

8 Q. Did Mrs. Thomas tell you why that
9 process wasn't being followed anymore?

10 A. She in the conversation, she said that
11 this was Kelly's doing.

12 Q. Okay. What -- was there anything more
13 specific than that? What did she mean by this
14 is Kelly's doing?

15 A. Admittedly, it was not one of my finer
16 hours. My response to her one was of anger,
17 disbelief, and one of frustration. And just
18 also one of the optics of, like, this isn't how
19 we agree.

20 So, I was very angry in my responding
21 phone call to her, which is where I remember
22 that phrase kind of mentioned.

23 Q. Okay. Did you have -- prior to the
24 April 11 meeting -- that would be where it was
25 officially on the agenda to appoint Kevin Hall

1 -- between the time you got the call from Mrs.
2 Thomas and the April 11 board meeting, did you
3 have any discussions with any of the other board
4 members about the solicitor issue?

5 A. Yeah. My phone logs show that I
6 called immediately upon getting the call from
7 Mrs. Thomas -- that I am not even sure the
8 order. But I immediately called -- I think
9 Brian Guistwhite was my first call, and he
10 wasn't there. But that evening there was three
11 phone calls made, and I was just for
12 clarification, am I interpreting this correctly?
13 Am I understanding, am I hearing it.

14 So, between that night and maybe the
15 morning after, I think there was three or four
16 phone calls made to Chris Kambic, Abby -- I
17 don't think I ever -- I would have to look back
18 at my call log. I know Abby was out of town, so
19 I don't know that she ever responded or I
20 connected with her.

21 But, yeah, in the spade of that
22 evening and the next morning, I would have
23 communicated, again, just so am I understanding
24 this correctly.

25 Q. Based on those conversations, what did

1 you glean or what was your understanding after
2 speaking with them?

3 A. It was kind of if I was interpreting
4 it correctly, that we were -- I guess at that
5 point the process was abandoned and -- but I
6 don't know that anyone really was confident or
7 at least people I spoke with understanding what
8 was happening. But -- so, I -- yeah.

9 Q. Okay. Did you -- you actually knew
10 who Kevin Hall was prior to this time, right?

11 A. Yes.

12 Q. How did you know him?

13 A. I have known him, just interactions in
14 New Cumberland. He was one of our New
15 Cumberland Board of Commissioners, I believe,
16 for awhile. He went to the same church -- or
17 goes to the same church that my family does.

18 Q. Okay.

19 A. And his son -- he has a son in the
20 same Boy Scout troop my son was in.

21 Q. Okay. There are some documents in
22 front of you that we have looked at --

23 A. Okay.

24 Q. -- previously. There is one there
25 that should be marked as Tierney No. 1. It

1 would be, containing among other things, an
2 e-mail that you wrote April 6. They are
3 probably not in order.

4 Could you take a moment to look at
5 that?

6 A. Sure.

7 Q. There is, I think, three pages here.
8 Just let me know -- after you have had a chance
9 to look at it, let me know if you recognize
10 those e-mails.

11 A. Yes. I recognize the first one that I
12 sent on April 5 that is describing the event
13 that happened a few weeks prior to that that I
14 would have had with Kevin Hall at my son's Boy
15 Scout night at Saint Theresa's.

16 Q. Okay.

17 A. I am kind of skimming.

18 Q. Right. What was your purpose for
19 writing that?

20 A. My purpose was to put in writing that
21 at the time it seemed -- at the time it didn't
22 stand out because it was three or four weeks
23 before everything else that happened. But he
24 had approached me at the Boy Scout meeting and
25 asked some questions about Brooke, questions

1 about what I thought was going to happen to the
2 solicitor.

3 I didn't handle it the way that I
4 wanted to at the time. I should have been much
5 more -- I tried to brush it off. I should have
6 been much more forceful with this is an
7 inappropriate line of questioning, we can't talk
8 about this in this setting.

9 Then when things transpired and I
10 reflected back to this night, I wanted to put it
11 in writing just because I felt very
12 uncomfortable with the conversation that
13 happened that Monday night, how I handled it,
14 then also in how things transpired down the
15 road.

16 So, it was merely just to share my --
17 to share what happened, but then just to put it
18 in official writing, my concern is this.

19 Q. Okay. On the second page here, which
20 I think is probably the beginning of the third
21 paragraph, it says, Kevin pressed me more and
22 intimated if we needed help, he could help
23 since, quote, his party listens to him, end
24 quote?

25 A. Yes.

1 Q. Then it says, as a former borough
2 council member of New Cumberland, I think I
3 understood.

4 What did you understand from that?

5 A. Well, I mean, my understanding when he
6 brought up political parties, that he was able
7 to -- again, my understanding was he was giving
8 me a message of my Republican party, or the
9 party that I am in, is -- they listen to -- I
10 have sway, or they listen to what it is I tell
11 them.

12 Q. Okay. Did you have a sense of why he
13 was telling you that, or why he would think that
14 was important?

15 A. No, no. Again, I think I'll leave it
16 at no, because it would have to be a guess, and
17 I don't want to guess.

18 Q. Okay. All right. Later on in that
19 same paragraph you say, I believe this has been
20 orchestrated since Kelly's RFP stunt. I am sure
21 that no RTK will be useful since they are
22 self-enforcing and our board leadership has
23 demonstrated no ethical behavior.

24 What -- when you talk about you
25 believe this has been orchestrated, what did you

1 mean by that?

2 A. I think that as things transpired,
3 that it was my belief that things have been
4 moving behind the scenes, that it wasn't a
5 coincidence that Mr. Hall had asked that line of
6 questioning, and then three weeks later, again,
7 amidst an abbreviated process, we just sort of
8 landed on him without an interview, without
9 deliberation -- I mean -- not deliberation, but
10 without an -- without there being any process.

11 So, this being written almost is a
12 reflection of, like, I guess at least connecting
13 dots from four weeks ago that experience, and
14 how it played out, or how it was delivered to
15 us.

16 Q. Also in front of you there is a
17 document which would be marked as Brent No. 5.

18 A. Okay.

19 Q. Take a moment to look at that. This
20 is an e-mail exchange between Brooke Say and
21 Kevin Hall from April 5, 2024. Take a minute to
22 look at that. Once you have, let me know if you
23 recognize this e-mail chain.

24 A. I do recognize the chain. And I
25 believe my -- I believe Ms. Say had sent this to

1 the entire board as well -- yes, Mrs. Say did
2 send a concern to the entire board, where I
3 believe this was all a part of as well.

4 Q. So, what is your understanding of the
5 purpose of Kevin Hall contacting Attorney Say on
6 the fifth?

7 A. I take it as literal that Heidi or
8 Mrs. Thomas had told him to -- that he was -- by
9 not having Brooke there, she was indicating to
10 him that the position was his. At least that is
11 how I interpret this. Yeah.

12 Q. In Attorney Say's response e-mail, it
13 indicates starting on the second sentence, this
14 confirms our conversation where you informed me
15 that you and your firm would be appointed at the
16 upcoming board meeting on April 11, 2024.

17 You informed me that President Thomas
18 asked you to make this communication about the
19 appointment and that my presence at the meeting
20 was not necessary. In response to my question,
21 you also advised there had not been a board
22 meeting or executive session where appointment
23 of your firm or solicitor was discussed.

24 Do you have any reason to question the
25 accuracy of Attorney Say's statement about what

1 went on in their conversation?

2 A. No.

3 Q. Do you -- I'll say in a previous
4 deposition, Mandy Davis claims that Brooke Say
5 is lying in this e-mail.

6 Have you been given any information to
7 suggest that maybe Brooke Say was purposefully
8 lying in this e-mail in any way?

9 A. No. I haven't seen anything to that
10 effect.

11 Q. Okay. Do you know why Mandy Davis
12 would make a claim like that?

13 A. No.

14 Q. Okay. Are you aware that Ms. Thomas
15 did, in fact, tell Brooke Say not to attend the
16 board meeting that evening?

17 A. That I am not aware of.

18 Q. Okay. Do you have -- if Attorney Hall
19 had not been told that he was going to be
20 appointed on April 11, do you have any
21 explanation of why else he would be making this
22 communication?

23 A. No.

24 Q. Do you know -- have any explanation
25 for why Attorney Hall would ask to start

1 transitioning files to him and his firm if he
2 wasn't sure he was going to be appointed on
3 April 11?

4 A. There has been no conversation about
5 that.

6 Q. All right. Also in front of you
7 somewhere is Brent No. 6.

8 A. Okay.

9 Q. This is an e-mail correspondence dated
10 April 3 and then April 5, initially from Kevin
11 Hall to Heidi Thomas, and then from Dr. -- from
12 Heidi Thomas to Dr. Stoltz to pass along an
13 e-mail. Just take a moment to look at this.

14 A. Sure.

15 Q. Tell me if you have ever seen these
16 e-mails before.

17 A. I -- I don't think that I have seen
18 this specific e-mail. I only can say that at
19 some point we did receive the information about
20 Tucker, information about Kevin Hall.

21 But, no, this would be the first time
22 -- I don't remember ever seeing these e-mails.

23 Q. Okay. On the first page on the April
24 3 e-mail from Kevin Hall to Heidi, it says,
25 please see the attached business agenda items

1 for the upcoming April meeting.

2 Do you have any explanation for why
3 Kevin Hall would be preparing business agenda
4 items for the board on April 3 if he hadn't been
5 appointed yet?

6 A. No.

7 Q. Next in front of you there is another
8 exhibit that was marked today, I think it was
9 Tierney No. 4. It is a text message -- or text
10 messages from you to David Brinton.

11 Take a look at that for a moment. And
12 after you have had a chance, let me know if you
13 recognize that?

14 A. I do, yeah. This is a text message I
15 sent -- the date is there -- to Dave Brinton.

16 Q. This is the morning of April 9?

17 A. The morning of -- so, I am trying to
18 put it in context of -- yeah.

19 MR. BONN: Tuesday, April 9.

20 THE WITNESS: Yes, I recognize the
21 text.

22 BY MR. ELLIOTT:

23 Q. Okay. So, what was your purpose of
24 sending this text and what did you want to
25 accomplish?

1 A. Okay. My purpose was to -- my purpose
2 was to try to have a conversation with David and
3 just talk to him about the procedural concerns
4 that I have and had. At that point I thought
5 that -- and I still think Mr. Brinton is a very
6 diligent man who respects process. And that was
7 -- that was my goal, and admittedly I looked at
8 it when I saw this before, I overstepped because
9 I put in there some personal things. I put in
10 there things that I certainly -- in this looked
11 like I was speaking for the board or speaking
12 for another group.

13 But we never met. There was never any
14 actionable items on this. I never had a
15 conversation with anybody or anybody else that
16 there was some plot or anything. It was mainly,
17 I guess, me trying to be hero and come up with
18 any solution to prevent what I anticipated was
19 going to be the chaos to follow.

20 Q. Okay. So, in terms of your statement
21 from -- regarding I want you to represent the
22 board as president, is that something that you
23 came up with on your own?

24 A. Yes. That was purely me. And at that
25 point I did give it the chaos of what was

1 happening.

2 Q. Is that something you thought that if
3 Mr. Brinton agreed to, that perhaps you could
4 convince a majority of the board to go along?

5 A. I mean, I guess it might have been a
6 hope, but we never had the conversation. It was
7 a Hail Mary, I would say. But I was only, I
8 mean, speaking for myself. Again, we didn't
9 have a conversation about this, which is why I
10 am kind of embarrassed and ashamed.

11 Q. All right. I think you said the
12 purpose of this, you respected Mr. Brinton's
13 willingness to follow process?

14 A. Yes. That would have been why I
15 specifically would have reached out to him,
16 thinking a procedural -- just, again, talking
17 about the optics and the process of it all.

18 I am not going to speak for -- it just
19 -- I was surprised that he was fine with the
20 process. That seemed out of the norm of the
21 little bit that I knew of Mr. Brinton.

22 Q. Did you make any sort of similar
23 contact or overtures to any of the other members
24 of the board who ended up voting for Kevin Hall?

25 A. No. To the best of my recollection,

1 no.

2 Q. Is there a reason why you thought --
3 maybe this is implicit in your last answer. But
4 is there a reason why you thought Mr. Brinton
5 would be more receptive to your concerns than
6 other members of the board?

7 A. Again, the brief time that we would
8 have known each other, he just seemed like a
9 very deliberative person that honored the
10 process. Even if it -- even if we had
11 disagreements, I felt very confident that the
12 process would be transparent with him. And he
13 is just, again, willing to answer lots of
14 questions -- or ask a lot of questions until he
15 is comfortable with the process.

16 Q. Did you actually have a follow-up
17 phone call or discussion with him?

18 A. No. Actually, I -- well --

19 Q. Before April 11.

20 A. No. No, there -- no. I am trying to
21 think how to word this.

22 He had sent me a text a couple weeks
23 ago related to the entire -- this entire thing.
24 But I don't know if that is appropriate to -- I
25 was uncomfortable with the text. But I don't

1 know it would be appropriate.

2 Q. This was something he sent directly to
3 you?

4 A. Directly to me.

5 Q. What did it say in the text?

6 A. That he believes that this is all a
7 witch hunt and he -- I don't -- can I get it
8 out? Or will it be -- I have --

9 Q. If it is on your phone, you can refer
10 to it.

11 A. I was uncomfortable, because, again, I
12 am obviously -- when our passions are up, I
13 don't want to not -- I don't want to not take
14 things seriously.

15 Let's be clear. This suit is lawfare
16 and I will have my pound of flesh when it is
17 over and I -- I responded, let's not talk about
18 this right -- I don't know what hyperbole, but I
19 said, we can't talk about this right now. I --
20 you know, I was just uncomfortable with that
21 pound of flesh when this is over, that comment
22 that -- yeah.

23 Q. Was that --

24 A. That was sent on January 26.

25 Q. Of this year?

1 A. Yes, this year. And he started, he
2 said, so hopefully your side of the aisle won't
3 try to sue me with reaching out. Let's be
4 clear, this is lawfare and I will have my pound
5 of flesh when it is over.

6 He tried to use that as a segue into
7 us reviewing a different policy, but I was kind
8 of made uncomfortable by that intro that I said
9 let's just not communicate right now.

10 Q. So, the rest -- there is more to the
11 text but that doesn't --

12 A. It gets into -- there is more to the
13 text, I just kind of said talk to administration
14 on this one.

15 Q. The rest of the text was not about
16 this lawsuit?

17 A. No, it was not about any of this.

18 Q. Okay. All right. Other than the
19 speaking briefly with Kevin Hall at the Boy
20 Scout meeting a few weeks prior to April 11, did
21 you have any other contact with him or talk to
22 him before the April 11 meeting?

23 A. No.

24 Q. Do you know if any of the other board
25 members you spoke to, meaning either Brian

1 Guistwhite, Christopher Kambic, or Abigail
2 Tierney, did any of them have an opportunity to
3 speak to Kevin Hall prior to the April 11
4 meeting that you are aware of?

5 A. In the conversations I -- no. I don't
6 remember them saying -- and it was kind of part
7 of the conversations that I had with them, like,
8 oh, hey, maybe I am the only one -- maybe I
9 misunderstood an e-mail or I missed something.
10 But in those conversations we had that night or
11 the next morning, I think everyone -- and part
12 of, I guess, the surprise of it was in the RFP
13 that was originally -- originally crafted. And
14 Mrs. Brent would never say who.

15 She just -- we tried to get -- or
16 during that meeting of, like, we need more
17 information about this document. But she did
18 have a list of vendors. I think what caught us
19 by surprise was that Tucker Arensberg wasn't on
20 the list she originally wanted to send the RFP
21 out to. So, I think that part of it was the
22 surprise of Abby or Christopher or Brian being,
23 like, who is this guy.

24 Q. Other than -- I think you indicated
25 that you did receive the attachments that --

1 regarding Tucker Arensberg and the engagement
2 letter and agenda items.

3 Other than that, did you receive any
4 information from any source about Kevin Hall or
5 Tucker Arensberg prior to the April 11 meeting?

6 A. I personally, no. I didn't get any.

7 Q. Do you remember how far in advance you
8 did receive those e-mail attachments?

9 A. Well, the phone call from Heidi
10 happened on a Friday for the Thursday meeting.
11 So, my guess is -- I hate to guess -- sometime
12 probably early that week before the Thursday
13 meeting, we would have had access to that
14 information.

15 Q. Do you believe you had enough
16 information and enough time to make an informed
17 decision about selecting a solicitor?

18 A. I personally, no. While I respect the
19 committee process, not being on that committee,
20 I didn't really have any input. But in terms of
21 deliberation or even hearing administrative -- I
22 would have felt more comfortable if there were
23 some more administrators that were able to
24 provide their expertise in the decision,
25 especially of special education, our director of

1 special ed.

2 MR. ELLIOTT: This will be a new
3 exhibit, if you could mark this as Trone No. 1.

4 (Exhibit Trone 1 marked for
5 identification.)

6 BY MR. ELLIOTT:

7 Q. Take a moment to look at that
8 document. After you have had time to review it,
9 let me know if you recognize that.

10 A. Here are the questions -- yes, I
11 remember this exchange. Meredith is a reporter
12 with the York Dispatch.

13 Q. On that second page, she is reaching
14 out to you with a number of questions. And the
15 first page and onto the second are your
16 responses to those; is that correct?

17 A. Yes.

18 Q. Okay. In particular -- No. 4, let's
19 start with that one, where you say, this is
20 true, there are e-mail copies that I believe
21 demonstrate that has been a clear and purposeful
22 violation of the Sunshine Act, as the content
23 and tone of these messages suggests that Mr.
24 Hall was informed that he has the job without
25 any board vote.

1 Do you remember making that statement?

2 A. Yes.

3 Q. At that time, did you believe that was
4 true?

5 A. Yes, I believe that was true.

6 Q. Okay. And since that time, have you
7 learned anything that would change your mind
8 about that?

9 A. No.

10 Q. Okay. Just in general, all the
11 statements that you have made in this e-mail, do
12 you believe all of them to be true and accurate?

13 A. I believe all of them to be true and
14 accurate, yes.

15 Q. And since the time you wrote that,
16 approximately April 9, have you received any
17 information that makes you question anything
18 that you put in that e-mail at the time?

19 A. No. I mean, if anything, from what I
20 saw, there was confirmation of some of this --
21 some of these things.

22 Q. What specifically do you think you
23 have seen that has been further confirmation of
24 your concerns here?

25 A. Well, I don't know if we are going to

1 get to it, but in the deposition -- the -- in
2 the deposition or in the paperwork that I
3 reviewed with Mr. Bonn a few weeks ago to
4 prepare for this, it had dates of right around
5 the same time that Kevin had talked to me as
6 kind of when first contact was made, either he
7 and Kelly or he and Heidi.

8 So, it looked like the conversation,
9 dialogue between Mr. Hall and people on our
10 board started that March 2, or first week of
11 March. So, having those dates to kind of
12 reinforce, I guess, my interpretations, I would
13 say that I think that kind of corroborates some
14 of this.

15 Q. Okay. Is there anything else you can
16 think of offhand that was additional
17 corroboration?

18 A. No. I think anything would be
19 speculation on my end, and I don't want to do
20 that.

21 MR. BONN: Are you referring to the
22 draft of the Interrogatory Responses that we
23 reviewed?

24 THE WITNESS: Yes, yes. Was I not
25 allowed to --

1 MR. BONN: No, you are --

2 THE WITNESS: I just know in seeing
3 that, it was alarming that the conversations
4 seemed to have started weeks before the April 9
5 or April, that vote. And it was right at the
6 same time that Kevin had. That is, I think,
7 kind of one of the things that it was that same
8 night or maybe the next day or the day before
9 when it looked like board leadership first had
10 contact with him as well.

11 BY MR. ELLIOTT:

12 Q. Did anyone ever explain to -- at any
13 time, either before April 11 or any time since
14 then, did anyone ever explain to you why the RFP
15 process was abandoned?

16 A. Yes.

17 Q. What is your understanding of that?

18 A. In executive session -- I'll be
19 careful, I don't know if executive session, is
20 that all privileged? Or is it just --

21 MR. BONN: I have been objecting to
22 any testimony regarding what happens in
23 executive session.

24 THE WITNESS: Okay.

25 BY MR. ELLIOTT:

1 Q. Let me start by asking you this.

2 A. Okay.

3 Q. Outside of either any executive
4 session or conversation you would have had with
5 Attorney Bonn, did any of the -- did any other
6 board member ever explain to you why the RFP
7 process was abandoned?

8 A. In subsequent meetings and whatnot.
9 And it was explained that Mrs. Brent seemed to
10 not believe that she was going to get the
11 candidate that she wanted.

12 I'll leave it at that. If I am not
13 allowed to talk about executive session things,
14 I won't.

15 Q. Okay. Did you hear that from Mrs.
16 Brent? Or did somebody else tell you that?

17 A. We kind of --

18 Q. Again --

19 A. I think that came out in another
20 executive session. So, Mrs. Brent never
21 directly said, hey, Adam, here is why I did
22 this. I never heard it from her.

23 Q. Do you believe that you ever heard at
24 any time during a public meeting anyone give an
25 explanation or rationale for why the RFP process

1 was not going to be followed through?

2 A. No. No.

3 Q. Do you believe that anyone ever stated
4 during a public meeting what Kevin Hall's
5 qualifications were to act as solicitor?

6 A. No. No.

7 Q. Are you aware if he had any prior
8 experience either as a school board solicitor or
9 any background in education law prior to April
10 11, 2024?

11 A. I would have been aware, because as
12 soon as we would have been given those
13 credentials, I tried to do my own diligence of
14 researching more, and I found the firm had no --
15 they weren't listing educational law as one of
16 their specialties.

17 So, whenever -- whether it was Dr.
18 Stoltz or Mrs. Thomas that sent that e-mail out
19 with, like, here are the -- whatever we last
20 looked at, I tried to do my own research just to
21 learn more about the firm. And I had honestly
22 never heard of Tucker Arensberg, so I wanted to
23 try to prepare myself the best I could.

24 Q. Did you learn anything about whether
25 or not Kevin Hall specifically had any prior

1 experience either as a solicitor or with
2 education law?

3 A. I could not find any evidence of that.

4 Q. In the course of the training you had
5 with regard to the Sunshine Act, do you have an
6 understanding or awareness if there is any legal
7 distinction between discussions versus
8 deliberations that a board might undertake?

9 A. I think that -- yeah, I am -- yeah.
10 To me, deliberations -- my understanding of it
11 would be that deliberations have to be in
12 public. And that while we could discuss certain
13 things in executive session setting, we were not
14 able to deliberate. That needs to be done in
15 front of the public.

16 Q. Okay. What exactly -- what is a
17 deliberation compared to a discussion? What is
18 it that a deliberation would be able to
19 accomplish?

20 A. I think deliberation would be shaping
21 an end goal or trying to come to an agreement,
22 versus a discussion is the goal may be just to
23 learn more about a process or to learn more
24 about an issue.

25 Q. Do you believe that any deliberations

1 ever took place at any public meeting concerning
2 the appointment of Kevin Hall as the solicitor?

3 A. I do not. Time was given to
4 deliberate, but it takes two to tango and nobody
5 else seemed to want to deliberate it in public.
6 So, there was a time where we tried to ask
7 questions and get answers in the public meeting,
8 but nobody wanted to answer the questions.

9 So, I don't feel there was meaningful
10 deliberation.

11 Q. Were you one of the board members who
12 asked questions at the April 11 meeting, to the
13 best of your recollection?

14 A. Yes.

15 Q. Do you believe you got a meaningful
16 answer to any of the questions you asked?

17 A. No, no. I think -- well, no.

18 Q. Do you have an opinion on whether the
19 five board members who voted for Kevin Hall
20 conducted deliberations outside of a public
21 meeting prior to April 11, 2024?

22 A. My opinion would be that, yes. My --
23 again, my opinion is yes.

24 Q. Do you have an opinion of whether
25 those five board members made a decision to hire

1 Kevin Hall and terminate Brooke Say outside of a
2 public meeting prior to April 11?

3 A. My opinion is yes.

4 Q. Okay. Do you believe this constituted
5 a violation of the Sunshine Act?

6 A. My opinion is yes.

7 Q. Do you believe that it was
8 intentional?

9 A. My opinion would be yes to that.

10 Q. Why is it that you believe it would be
11 intentional?

12 A. I think that -- I think with five
13 being the magic number and past experience, even
14 though at this point we were still relatively
15 new as a school board, four of us members have
16 been iced out of just about every discussion.
17 So, there was a lack of trust and transparency
18 there.

19 And then based on -- I mean, based on
20 the e-mails now that I am seeing exchanged, I
21 just -- me, personally, don't know how you get
22 to any other conclusion.

23 Q. Do you think you and the other board
24 members who ultimately voted against the change
25 in solicitor, do you believe that you were

1 intentionally excluded from the ability to
2 effectively interview Kevin Hall prior to the
3 meeting?

4 A. Yes. And I say that as somebody who
5 wasn't even on the committee to do it. Just --
6 as you can see in the e-mail exchange, Kevin
7 came to the meeting prepared to be the
8 solicitor. And I wasn't even sure we would have
9 the ability to e-mail him that week to ask him
10 questions. So, I essentially was never able to
11 ask about experience or why, how did we land on
12 him.

13 Q. Okay. Next, if you could take a look
14 at what's marked as Brent No. 11.

15 A. Okay.

16 Q. It is a one-page exhibit.

17 A. Okay.

18 Q. This is an excerpt from the answer and
19 new matter that the district filed in response
20 to the complaint. I want to draw your attention
21 specifically to Paragraph 54 which says, upon
22 information and belief, Plaintiffs Stephen
23 Beaver, Leah Cooper, Amy Elliott, John Elliott,
24 Jeff Harmon, Tara High, Katherine Jan Jarrett,
25 Jesse Sayre, and Jane Vivier have brought this

1 lawsuit for the illegitimate means of imposing
2 their political agenda on the West Shore School
3 District, regardless of how the majority of the
4 duly-elected board members voted.

5 Do you agree with that statement?

6 A. No.

7 Q. Okay. Has anyone on the board given
8 you any basis or evidence to support the
9 contention that the basis for bringing the
10 lawsuit is illegitimate?

11 A. Mr. Brinton in that text message I
12 sent did, and -- yeah. There were similar
13 comments made during an executive session, but
14 things I can't talk about.

15 Q. Okay. In the text message, that
16 essentially says he believes it is political --

17 A. Yeah.

18 Q. -- and he wants to get his pound of
19 flesh. But other than --

20 A. Other than that, again, with comments
21 made in executive session.

22 Q. Okay. Is there --

23 A. Mr. Elliott, could you -- I want to
24 make sure I am understanding the question. Can
25 you ask it again, please?

1 Q. Yeah. My question is, have you been
2 -- has any board member provided you with any
3 evidence that the lawsuit is being brought
4 essentially knowing that there is no legal or
5 factual basis?

6 A. I know Mrs. Brent gave a public -- she
7 had written a public statement and delivered it
8 in a public meeting about how she sees this as a
9 political attack. So, it wasn't directly given
10 to me. And in seeing the information that was
11 prepared in that -- what was the document that
12 we --

13 MR. BONN: Interrogatories.

14 THE WITNESS: The Interrogatory. I
15 noticed that part of what it seems was it was
16 almost a flip statement, where the board
17 majority, I guess, was saying that they were
18 unable to use -- they were unable to enact their
19 political agenda.

20 Well, I better not comment on that
21 document. I just -- one of the lines stood out
22 to me where they mentioned that, I guess, we
23 were trying to stop their political agenda.

24 BY MR. ELLIOTT:

25 Q. Did any board member specifically

1 identify what the political agenda is that the
2 Plaintiffs are trying to impose?

3 A. I think in Mrs. Brent's public
4 comments that she made, it was more along the
5 lines of just stalling, delaying tactics, or --
6 I mean, she clearly identified the Defendants.
7 And I don't know all of the -- she clearly
8 identified it as being a Democratic witch hunt
9 against the board majority.

10 Q. Are you aware of a legal distinction
11 between if a Plaintiff brings a claim, don't
12 ultimately win, versus at the time they bring
13 the complaint, they don't have any reasonable
14 factual or legal basis to bring it in the first
15 place?

16 A. That sounds -- I am not sure I
17 understand that.

18 Q. You understand that it is -- like, the
19 Plaintiffs could have a good faith belief in
20 their claim.

21 A. Okay.

22 Q. They might not ultimately win or meet
23 their burden of proof.

24 A. I understand that, yes.

25 Q. And that is distinct from they know

1 from the outset that there is really no legal
2 basis, but our purpose is for something not
3 legitimate?

4 A. I understand that difference.

5 Q. All right. Other than identifying
6 that people -- particular -- either particular
7 Plaintiffs or people they think Plaintiffs are
8 associated with have different political views,
9 is there any other evidence you are aware of
10 that any of the board members have shared that
11 would imply that the Plaintiffs don't really
12 believe they have a legitimate --

13 A. No.

14 Q. -- Sunshine Act case?

15 A. No.

16 Q. Based on your statements, would you
17 agree that you believe that there is at least a
18 good faith basis to believe that a Sunshine Act
19 violation could have occurred?

20 A. Yes.

21 Q. Give me a sec to make sure we went
22 through all the exhibits I wanted to talk about.

23 One other thing.

24 A. Sure.

25 Q. Brent No. 10, that is an exhibit that

1 has already been gone over. This is an e-mail
2 between Christopher Kambic and Thaddeus
3 Eisenhower. Basically, there was an e-mail from
4 Thaddeus Eisenhower April 8, and then there is a
5 response e-mail from Christopher Kambic dated
6 April 10, where he copies the original e-mail
7 and then puts his response in italics.

8 A. Oh, okay.

9 Q. We had some confusion about that in an
10 earlier deposition. So, I want to be --

11 A. Okay.

12 Q. After you have a chance to look at
13 this, let me know if you have ever seen this
14 e-mail exchange before.

15 A. I have never seen it. But I would be
16 curious.

17 Q. In it, Mr. Eisenhower makes a number
18 of statements about Kevin Hall supporting him.

19 Do you have any idea how Thaddeus --
20 let me back-up.

21 Do you know who Thaddeus Eisenhower
22 is?

23 A. I do, yes. Yes, I do.

24 Q. Do you know him personally?

25 A. We have met a few times. Small town

1 of New Cumberland.

2 Q. Yeah, okay. Do you have any -- can
3 you explain how he would have known on April 8
4 that Kevin Hall was being put forward as the
5 next solicitor for the school district?

6 A. I have no idea how he would know that.
7 Outside of -- so, that would have been a Monday.
8 Friday would have been -- Friday -- I am trying
9 to work backwards. Friday the 7th or 6th would
10 have been when I found out about Kevin Hall.

11 So, if he sent his e-mail on the
12 eighth, he essentially knew at the same time I
13 did, or a day after, or two days after if he
14 knew that on Monday, and Heidi's call came in to
15 me on April -- maybe it was April 6. So, we
16 somehow both knew at the same time.

17 Q. You don't --

18 A. And I have no idea how he would know.
19 I am just skimming this now for the first time.

20 And does he -- nevermind. I guess I
21 can't ask a question.

22 Q. So, none of the other board members
23 discussed with you whether they spoke to anyone
24 outside of the board members about Kevin Hall
25 prior to the April 11 meeting?

1 A. No. Not to the best of my
2 recollection.

3 Q. Give me just a second to review my
4 notes.

5 A. Sure.

6 Q. I don't have too much more here.

7 Let me -- if you can look at Tierney
8 No. 2, that would be one of the ones that has a
9 yellow sticker.

10 A. Okay.

11 Q. This is an e-mail that Abigail Tierney
12 sent out dated April 9, 2024.

13 A. Okay.

14 Q. Take a moment. And there is an e-mail
15 that has an attachment to it. Let me know if
16 you remember seeing this e-mail before.

17 A. I have seen this, in that I think I
18 was copied on it as well. Yes.

19 Q. What is your understanding of why Ms.
20 Tierney sent that e-mail?

21 A. I think my -- it would just be a
22 guess. But I don't know that I necessarily want
23 to speak for her.

24 But I think it was -- I am assuming it
25 was to draw public attention and try to raise

1 awareness and encourage community members to
2 become involved.

3 Q. You had a chance to read this over.
4 Is there anything in that e-mail you think is
5 inaccurate in any way?

6 A. No. I mean, first blush, everything
7 looks accurate to me.

8 Q. And Ms. Tierney testified earlier
9 today that the exchange from -- or in-between
10 Brooke Say and Kevin Hall had been forwarded to
11 her to the entire board by Attorney Say prior to
12 the April 11 meeting?

13 A. Yes, that was --

14 Q. Were you copied on that communication?

15 A. Yeah. We were copied on -- that was
16 the one I was referring to earlier, April 5 --
17 the Friday, April 5 one where he is addressing
18 Attorney Brooke and her response, which was an
19 hour after that. We were included on -- she had
20 sent that to the entire board with her concerns.

21 Q. Just to be clear, were her concerns
22 expressed -- is that part of an attorney-client
23 communication? Or do you know?

24 A. I don't believe so.

25 Q. Let me be more specific. The

1 communication that Attorney Say sent to the
2 board that included the discussion between -- or
3 the e-mails between Brooke Say and Kevin Hall,
4 was that simply forwarding those e-mails? Or
5 was there attorney-client communications in
6 addition to that?

7 A. I think it was forwarding those
8 e-mails. I don't think there was attorney-
9 client.

10 Q. If you can briefly -- I think this
11 will be the last thing. Brent No. 7, which is
12 right on top. This is the minutes from the
13 April 11 meeting.

14 A. Okay.

15 Q. Page -- on the bottom right corner,
16 there is page numbers between 331 and through
17 342?

18 A. Okay.

19 Q. It lists written comments that were
20 shared with the board in advance of the meeting.

21 Did you get those written comments
22 prior to the meeting?

23 A. Yes. Dr. Argot would have forwarded
24 any e-mail communications to us.

25 Q. And I think there is approximately

1 over 100 of these written communications.

2 A. Mm-hmm.

3 Q. Would you agree that the large
4 majority of these express some concern with the
5 way the solicitor transition is being handled?

6 A. Yes.

7 Q. Would you agree that there is a number
8 of those that also suggests that it is perhaps a
9 Sunshine Act violation?

10 A. Yes. I remember that -- yes. I
11 remember both the public comment that were there
12 and the e-mails that came in.

13 Q. There are also a number of people who
14 spoke in person expressing those same potential
15 concerns?

16 A. Yes.

17 Q. All right. Did you -- do you believe
18 you ever got an explanation from the board why
19 they were pushing forward in light of all those
20 public comments coming out?

21 A. Not in public, no.

22 Q. Was there any public acknowledgment of
23 that or explanation as to why the board believed
24 they were proceeding correctly or in accordance
25 with the law?

1 A. No, I don't believe that was ever
2 enunciated.

3 MR. ELLIOTT: I think that is all I
4 have. If you have any follow-up.

5 MR. BONN: I have a few questions.

6 THE WITNESS: Sure.

7 EXAMINATION

8 BY MR. BONN:

9 Q. Why were you concerned that hiring a
10 new solicitor would cause chaos?

11 A. It wasn't necessarily hiring them
12 would cause chaos. It was the process in which
13 it was happening, or the process which it was
14 going through.

15 Contrary to what I put in my text to
16 Mr. Brinton, in hindsight I think Stock and
17 Leader was doing fine. But I didn't have --
18 again, the -- in context of this is exactly the
19 same time that we were meeting with the ILC,
20 other boards were doing this.

21 So, my concern was process, but also
22 no -- no deliberation onto why it was necessary
23 and why now in terms of context, because I -- in
24 May, I believe we annually redo the solicitor
25 contract anyway. So, it was -- my concern was

1 why is this an endeavor we are doing now, and
2 the process behind it.

3 Q. When you mentioned the ILC, is that
4 the Independence Law Center?

5 A. Independence Law, yes.

6 Q. Were you concerned the board was going
7 to have some sort of relationship with the
8 Independence Law Center?

9 A. Personally, I mean, after knowing that
10 it was Kevin Hall, no. But we had invited the
11 ILC in to share things with us. So, I was
12 concerned that prior to it being announced that
13 it was Mr. Hall, I was even more concerned that
14 it might be the Independence Law Center.

15 Q. Would you agree with me that would be
16 a political concern?

17 A. No. My concern there would be more of
18 I don't believe they represent the values that I
19 hold. So, I don't see that as a political
20 concern.

21 Q. When Dave Brinton referred to getting
22 a pound of flesh, do you believe he meant he
23 intends to file a lawsuit after this lawsuit is
24 over against the Plaintiffs for malicious
25 prosecution?

1 A. Yes.

2 Q. You don't have any reason to believe
3 he intends any sort of violence or anything?

4 A. No, I do not think that he has any
5 violent retributions. But, again, if you are
6 objecting and we aren't allowed to say things
7 about what happened in executive session, I
8 would just leave my answer as yes, I think that
9 he would or is looking for some type of
10 retribution.

11 Q. You said that you reviewed Tucker
12 Arensberg's website prior to the April 11
13 meeting?

14 A. Yes. Very cursory of kind of their
15 services and kind of trying to find more about
16 Mr. Hall's experience, education, whatnot.

17 Q. Is it your testimony that Tucker
18 Arensberg as a firm did not have any
19 representations regarding their experience with
20 education law?

21 A. If I am remembering correctly, I know
22 that Mr. Hall himself had none, or had no
23 experience in that arena. I don't remember if
24 the firm itself. I think that I remember more
25 specifically Mr. Hall didn't.

1 Q. Was there an information sheet on
2 Tucker Arensberg distributed with the meeting
3 packet?

4 A. Yeah, it would have been included in
5 one of those -- and I am not sure --

6 Q. It is not in any of these exhibits.

7 A. I am not sure we would have gotten it
8 as part of an executive session if it was a
9 paperwork or whatnot. We did get, I think, a
10 bio of him and outline of their services.

11 Q. Was it your recollection that any of
12 the attorneys at Tucker Arensberg had education
13 law experience?

14 A. I do not know. Again, I was solely
15 focused on him as the point of contact.

16 Q. Looking at Trone 1.

17 A. Sure.

18 Q. Do you know how the newspaper knew
19 that Kevin Hall was being considered as a
20 candidate for the solicitor position?

21 A. I have no idea.

22 Q. I'll ask that question another way,
23 because I am concerned about how I asked that
24 question.

25 Meredith from the York Dispatch says,

1 I have heard the board will hire a new attorney
2 on Thursday. That was in an e-mail on April 9,
3 2024 at 4:08 p.m.

4 Do you have any idea how she would
5 know that the board will hire a new attorney?

6 A. No.

7 Q. Do you have any proof that the five
8 so-called majority board members, that would be
9 Heidi Thomas, Kelly Brent, David Brinton, Mandy
10 Davis, and Brenda Cox, do you have any evidence
11 that they discussed hiring Kevin Hall as
12 solicitor prior to the April 11 meeting?

13 A. I personally have no direct evidence
14 to that.

15 Q. None of them have told you they talked
16 to each other?

17 A. None of them have told me they talked
18 to each other.

19 Q. Did any of them tell you how they were
20 going to vote prior to April 11?

21 A. No. We never had any conversations
22 about that.

23 Q. So, how are you so sure that they did
24 meet -- how are you so sure they discussed
25 hiring Kevin Hall before the meeting?

1 A. Well, I think one of the things is on
2 another document, which isn't here, they all
3 admitted to having contact with him weeks in
4 advance. So, I guess my concern is how did they
5 know -- they knew that Kevin Hall was under
6 consideration before I did.

7 So, does that mean they -- I could not
8 100 percent say there was deliberation, but
9 there was at least something that -- again, I
10 think those conversations started the first week
11 of March, all of them admitted they talked to
12 him. It sounded like a few of them had the
13 opportunity to ask him questions.

14 So, I personally do not hold any
15 evidence to say that reached -- they never told
16 me, I should say, they have reached any -- that
17 they have reached any conclusion. My concern
18 is, again, in the entire picture with the lack
19 of deliberation, the lack of transparency, the
20 fact that five of them were pursuing and
21 interviewing, questioning, and talking to him,
22 again, they knew weeks before I did that Kevin
23 Hall was a possibility.

24 So, that's a long way of saying in my
25 opinion, the coincidences and whatnot are just

1 too much to believe that there was no
2 deliberation or no -- but I do not have -- out
3 of fairness, no one has ever told me that they
4 deliberated.

5 Q. And you -- we saw from one of the
6 exhibits you text with other board members?

7 A. In this one to Dave. Very, very
8 sparingly. I do try to keep -- I try to keep as
9 much as I can to my two kids and to surviving.
10 So, you know, a happy birthday text, perhaps.
11 But we normally do not make it a common practice
12 to text one another, or to, you know.

13 Q. Do you ever use an app called Signal
14 to text other board members?

15 A. No.

16 MR. BONN: I have no other questions.

17 MR. ELLIOTT: Just, I think, one
18 follow-up.

19 RE-EXAMINATION

20 BY MR. ELLIOTT:

21 Q. You indicated that based on your past
22 experience, you sometimes felt iced out of
23 discussions. Can you give me an example or
24 examples of that?

25 A. Well, there were things that had

1 happened. I felt iced out in our original
2 bringing the ILC in for an informative seminar.
3 I felt iced out of really anything of substance
4 was -- I felt iced out during this process of I
5 recognize I wasn't on the RFP committee, so I
6 wouldn't have access to all of the information
7 that the committee members had. But in terms of
8 the abrupt nature of how it ended, and without,
9 in my opinion, getting satisfactory answers to
10 it, I felt iced out.

11 A couple of our board members had met
12 with the Byrnes Health Center, and I thought
13 there was no discussion of kind of as a board,
14 why we were meeting with the Byrnes Health
15 Center.

16 Those are ones that stick out of the
17 top of my head.

18 Q. Okay. I think you also mentioned you
19 thought there was a lack of transparency. Is
20 that the same examples as you gave for feeling
21 iced out?

22 A. Yeah. I can go back to when the RFP
23 -- the original one that Mrs. Brent gave us, we
24 were given it, like, 30 minutes before a
25 meeting, so we didn't really have time to dig

1 into it.

2 And then Mrs. Brent refused in a
3 public committee to -- maybe she didn't have to
4 -- but refused over and over again to say where
5 -- was it her that put it together, how did we
6 get this document, how was there -- did she
7 collaborate with administration or with experts.

8 So, that part of it was certainly not
9 transparent.

10 Q. Do you have any concerns that lack of
11 transparency might continue in the future?

12 A. Yes.

13 Q. Do you -- have you experienced that at
14 any time either recently or any time after April
15 11, can you think of any other examples where
16 you think there was a lack of transparency?

17 A. I know there have been examples. Off
18 the top of my head -- if you give me 30 seconds.

19 I think to an extent during our budget
20 situation in May, that there was -- this was
21 speculation on my end. Again, I don't feel like
22 we had productive deliberations.

23 I am going to struggle off the top of
24 my head to think of another concrete example of
25 it. I want to make very -- like, I am trying to

1 be very -- separate leadership style versus an
2 actual nontransparent -- there have been
3 leadership things that I just I would not have
4 done that way, but that doesn't necessarily mean
5 that there was an intent to be nontransparent.

6 Q. You weren't at the Byrnes Health
7 Center meeting where the board members and a
8 parent met with representatives, right?

9 A. I was not, no.

10 Q. Did you speak to anyone who was in
11 attendance in that meeting about what happened?

12 A. I did, yes.

13 Q. Who did you talk to?

14 A. I talked to -- I forget his name. I
15 talked to Kevin Wilson, Dr. Wilson. I think he
16 is Dr. Wilson. He was the Byrnes Health Center
17 -- one of their representatives there. And I
18 only spoke to him in passing because I saw him
19 at one of the -- the school I teach with, he was
20 there at a career expo fair, and I talked to him
21 there.

22 And he was very -- he didn't mention
23 specifics, because I think he also was -- it
24 wasn't an appropriate time for us to have a
25 conversation about things. He was very guarded

1 with what he -- but he kind of alluded to just,
2 like, that was a show. And we never -- other
3 than him being there, I don't know who else was
4 there.

5 Q. He didn't really tell you anything
6 specific about what occurred at the meeting?

7 A. He just said the tone was very hostile
8 and that he felt sympathetic towards our
9 administrators just for how that meeting went
10 down. But, again, he didn't share much of,
11 like, specifics or anything like that.

12 MR. ELLIOTT: All right. I think that
13 is all I have.

14 MR. BONN: I have nothing further.

15 (At 4:58 p.m., the deposition
16 concluded.)

17 * * * *

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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

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

17

18 Dated this 10th day of March, 2025.

18

19



20

21 Angela N. Kilby - Reporter
22 Notary Public

21

22

23 Commission Expiration: June 2, 2027

23

24

25

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