

BEFORE THE MARYLAND OFFICE OF ADMINISTRATIVE HEARINGS

HARRISON W., ET AL

*

Appellants

*

v.

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OAH CASE NO.: MSDE-BE-16-16-02815

BOARD OF EDUCATION OF

*

CARROLL COUNTY

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AFFIDAVIT

I, Donald Walsh, am counsel to the Appellants in the above proceeding and solemnly affirm under the penalties of perjury that the contents of this affidavit are true and correct to the best of my knowledge, information, and belief:

1. As part of my representation in this case and pursuant to COMAR 28.02.01.13, I forwarded Requests for Documents to Carroll County Public Schools.

2. Responsive documents to that request were made available for my review and inspection at the offices of CCPS. Rather than providing electronically discoverable information, CCPS printed out and provided copies of hundreds of documents and emails.

3. The Exhibits attached to Appellants' Responses to the Motions filed by CCPS (as well as those attached to the Notice of Appeal), are true, accurate and genuine copies of documents provided as part of that production, are taken from CCPS' own website or, where identified, are copied exactly from Carroll County's website.

4. In certain cases, only the relevant or pertinent pages of lengthy exhibits have been copied. Full copies of the documents or reports referenced can be produced if and when necessary.

5. Although not subject to the strict rules of evidence in this administrative hearing, the documents are all authentic or self-authenticating and all are either admissible as non-hearsay or exceptions to the rules of hearsay.

3/18/16
Date



Donald J. Walsh