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VIRGINIA DEPARTMENT OF EDUCATION

DUE PROCESS HEARING

REDACTED, by and through her
Next Friends, her Parents, REDACTED
and REDACTED,

Petitioner,

vs. VDOE Case No. 22-84

CHESTERFIELD COUNTY SCHOOL BOARD,

Respondent.

DAY 8

TRANSCRIPT OF PROCEEDINGS

BEFORE SARAH S. FREEMAN, ESQ., HEARING OFFICER

March 30, 2022

9:00 a.m. - 10:47 a.m.

Midlothian, Virginia

Job No. 47232

REPORTED BY: LORI A. BOEDING, CCR

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ALSO PRESENT :

April Lennox, CCPS Dyslexia Specialist

REDACTED , Parents

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3	Parents No. 33	2,069	--
4	Parents No. 51, Pages 000626 and 000627	2,031	--
6	Parents No. 125	--	2,074
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1 (9:05 a.m.)

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P R O C E E D I N G S

4

5

(Court reporter previously sworn.)

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7

THE HEARING OFFICER: I'm going to go on the record now. We are going to begin. I think this is the eighth day, if I'm not mistaken, the eighth day of REDACTED v. Chesterfield County Public Schools or School Board.

8

9

10

11

12

And when we left yesterday, which was the seventh day, I believe, the School System had rested and counsel for the Parents had asked for an opportunity -- and this was earlier before school counsel rested, and I think it was right at the time that Mr. Ratner rested with the Parents' case that Ms. Ratner[sic] would like -- or he advised me that Ms. Ratner[sic] would like to make some commentary.

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21

MR. RATNER: Mrs. REDACTED. You said,

22

Ms. Ratner.

23

THE HEARING OFFICER: Excuse me. Mrs. REDACTED.

24

I did it again.

25

And I'm going to give her latitude to say

1 whatever she thinks that I need to hear. So I'm
2 not going to -- I'm not going to listen to too many
3 objections. I do want her to be able to speak
4 freely, but this is your opportunity to tell me
5 what you think I need to know.

6 MR. RATNER: Great. So we would like to call
7 her on rebuttal.

8 THE HEARING OFFICER: And you recall that you
9 were sworn earlier?

10 MRS. REDACTED: Yes.

11 MS. OWENS: Ms. Freeman, to the extent that
12 testimony that's going to be offered opens new
13 doors, then the School Board would --

14 THE HEARING OFFICER: I understand that. I
15 didn't mean that there weren't going to be any
16 rules. What I mean is I'm going to give her great
17 latitude. If she goes into an area that you feel
18 is objectionable, then just tell me.

19 MS. OWENS: Thank you.

20 THE HEARING OFFICER: But I do want her to
21 feel comfortable enough to tell me what she thinks
22 I need to know with latitude.

23 MR. ANDRIANO: But Ms. Freeman, we would just
24 state for the record, Mrs. REDACTED has already
25 testified, I think, for four hours or so and also

1 had an opportunity to provide a soliloquy, if you
2 will, at one point in this hearing, so just point
3 that out.

4 THE HEARING OFFICER: Thank you for pointing
5 that out. And for the record, I believe that her
6 testimony -- or I know her testimony was at the
7 initial stage of the hearing, and we've had a lot
8 of testimony. That's why when I started out, I
9 said that I'm viewing her testimony as rebuttal,
10 first of all. But during the rebuttal, I'm going
11 to ask her -- I'm going to tell you that I'm going
12 to give her latitude. So I want her to be able to
13 testify as freely as she wants within the confines
14 of opening up new areas, objectionable statements,
15 statements that are not appropriate or proper based
16 on the evidence, and on other objections I've
17 already ruled on. So that I would say would be the
18 limitations.

19 Having said that, go ahead.

20 MR. RATNER: Thank you. Just before I get
21 started, I would encourage you, if you have
22 questions that you feel haven't been answered,
23 please ask because we don't want this to end with
24 you having unanswered questions.

25 THE HEARING OFFICER: I understand. Thank

1 you.

2

3

REDACTED ,

4

having been previously sworn,

5

testified further as follows:

6

7

REBUTTAL DIRECT EXAMINATION

8

BY MR. RATNER :

9

Q So Mrs. **REDACTED** , just to sort of set the stage,
10 you've been here every day of this hearing?

11

A Yes.

12

Q And you've listened to every witness who has
13 testified, correct?

14

A Correct.

15

Q And you've following along in the documents
16 as well, correct?

17

A Correct.

18

Q So have you heard in the course of this
19 hearing either statements or seen documentary evidence
20 that you either feel is inaccurate or incomplete that
21 you would like to address now?

22

A Yes.

23

Q So I'm going to be try to be targeted about
24 this but don't feel so boxed in. As the Hearing
25 Officer said, she wants you to have a full opportunity.

1 I'd like to just start with Mr. Lawson. I
2 think that's going back to Tuesday of last week.

3 Do you recall a conversation, or excuse me,
4 an exchange in his testimony where he indicated that he
5 never communicated with you directly about REDACTED and her
6 education?

7 A Yes.

8 MR. ANDRIANO: Objection. Ms. Freeman, this
9 is --

10 MS. RATNER: This is rebuttal.

11 MR. ANDRIANO: I think here's where we're
12 going to have our objection, Ms. Freeman.
13 Mr. Lawson was Mrs. REDACTED's witness. Mr. Lawson
14 wasn't the School Board's witness. So how can one
15 rebut one's case?

16 MS. RATNER: What rule precludes rebuttal of a
17 statement by one's own witness?

18 MR. RATNER: Are you aware of one? Because
19 I'm not.

20 MR. ANDRIANO: Well, there's no particular
21 rule --

22 MS. RATNER: Right, there's no rule.

23 MR. ANDRIANO: -- that addresses rebuttal or
24 surrebuttal other than rebuttal is supposed to be
25 focused in on rebutting the defendant's evidence,

1 not their own evidence.

2 MR. RATNER: Well, first of all, he's their
3 witness in terms of he's a CCPS employee. But,
4 again, to try to expedite this, I don't intend to
5 have her give big statements or give a lot of
6 commentary on this document. We would like to get
7 a document in the record for you to read.

8 THE HEARING OFFICER: Which document is it?

9 MR. RATNER: It's not in the books yet because
10 we didn't anticipate him saying something. So the
11 first question is -- and you haven't ruled on their
12 objection yet.

13 THE HEARING OFFICER: Yes, as I said, I'm
14 going to give them latitude. I've noted your
15 objection. But I think we need to have a
16 limitation on going into all of your witnesses, and
17 if I recall correctly, I don't believe you
18 identified your witnesses as possibly adverse
19 witnesses.

20 MS. RATNER: We did not know --

21 MR. RATNER: I mean, I thought that that was
22 implied if they worked for the defendant.

23 MR. ANDRIANO: But, Ms. Freeman, it was their
24 witness. If they wanted to go into emails and such
25 with Mr. Lawson or try to contradict --

1 THE HEARING OFFICER: That's why I'm going to
2 limit the testimony. So you can tell me a response
3 to that question, and then we're going to move on.

4 Is there a document?

5 MR. RATNER: There is.

6 BY MR. RATNER:

7 Q But the first question is, did you ever
8 communicate directly with Mr. Lawson about REDACTED's
9 education?

10 A Yes.

11 Q Okay. I have a document. It's been
12 previously produced. It was not in our book because we
13 did not anticipate Mr. Lawson -- I'm going to show it
14 to you first.

15 THE HEARING OFFICER: Okay. Thank you.

16 MR. RATNER: Would you like a copy?

17 I'm not going to hand it to Mrs. REDACTED until
18 you give me permission to, Ms. Freeman.

19 THE HEARING OFFICER: Have you-all looked over
20 this document?

21 MR. ANDRIANO: No.

22 THE HEARING OFFICER: All right.

23 MR. RATNER: Again, to perhaps cut off some of
24 the consternation, I'm just going to ask her to
25 identify this as an email exchange between

1 Mr. Lawson and herself. You can certainly read it
2 for yourself, but we think it should be in the
3 record because it goes directly to the credibility
4 of the testimony. It may be an innocent mistake.
5 I'm not saying he lied. I just think it's
6 important to show he did not have complete recall.

7 MR. ANDRIANO: That's our point. You needed
8 to refresh -- if you wanted to -- first of all, if
9 you wanted to introduce this into evidence, it
10 needed to be in your evidence book five days prior
11 to.

12 Second of all, if you wanted to cross-examine
13 Mr. Lawson on his recollection, you needed to do it
14 when he was on the witness stand, not in rebuttal.

15 MR. RATNER: I'm not cross-examining
16 Mr. Lawson on his recollection. I'm asking
17 Mrs. REDACTED if he made a misstatement. That's
18 number one.

19 Number two, the rules -- and, again, there's
20 been a lot of very interesting interpretations of
21 the rules in this case. The rules are very
22 clear --

23 THE HEARING OFFICER: I am cutting off
24 editorial commentary on my rulings.

25 MR. RATNER: I said I was talking about

1 Mr. Andriano's interpretation. I'm not sure why
2 every time I say something you immediately think
3 it's about you.

4 THE HEARING OFFICER: Okay. We need to stop
5 the commentary. As I've said, you need to stop
6 commenting on my rulings, on Mr. Andriano's
7 objections, on Ms. Owens' objections. Just make
8 the objection, and it will be ruled upon.

9 MR. RATNER: Great. So the rule is very clear
10 that you have authority to exclude documents that
11 aren't in your book. It is not an absolute that
12 you must. I think that's an important point.

13 THE HEARING OFFICER: Thank you for clarifying
14 that for me.

15 MR. RATNER: The last point I would make is
16 that I don't know how we could put every document
17 in the book because I didn't know Mr. Lawson would
18 deny having communications.

19 THE HEARING OFFICER: I understand that.
20 What I was going to do is accept the document
21 because it's offered in rebuttal, even though the
22 School System feels that rebuttal in this case is
23 inappropriate because Mr. Lawson was your witness.

24 MR. RATNER: Great. So I would like to offer
25 that into evidence as Parents' 126.

1 THE HEARING OFFICER: I'm going to accept the
2 document in response to the question about whether
3 or not Mr. Lawson made the statement that, I
4 believe, statement to the effect of that there was
5 no communication between Mr. Lawson and Mrs. REDACTED .

6 Is that right?

7 MR. ANDRIANO: I haven't seen this, first of
8 all. Then, obviously, if he's trying to indicate a
9 statement from Mr. Lawson, that's going to be
10 hearsay.

11 MR. RATNER: I've already said very clearly,
12 all I want is it in the record. It's in the
13 record.

14 THE HEARING OFFICER: It's apparently to show
15 me that Mr. Lawson is somehow not credible, even
16 though he was your witness and he testified on your
17 behalf, but I will accept it, and as a rebuttal
18 document.

19
20 (Parents' Exhibit No. 126 admitted.)

21
22 MR. RATNER: So I'd like to move to another
23 subject, if I may.

24 THE HEARING OFFICER: Good. Go ahead.

25 MR. RATNER: Thank you.

1 BY MR. RATNER:

2 Q You've heard some discussions about whether
3 or not REDACTED had a dyslexia diagnosis and what that
4 means, during the course of the hearing, did you not?

5 A Correct.

6 Q Did you ever have any communications with any
7 employee of Chesterfield County Public Schools about a
8 dyslexia diagnosis?

9 MR. ANDRIANO: Objection. Ms. Freeman, we
10 already have a stipulation on the record addressing
11 this.

12 THE HEARING OFFICER: Addressing the
13 diagnosis?

14 MR. ANDRIANO: That there is no diagnosis. We
15 stipulated to that.

16 THE HEARING OFFICER: I remember that.

17 MR. ANDRIANO: So why are we wasting time?

18 THE HEARING OFFICER: I was the one who broke
19 the rule by bringing up dyslexia.

20 MR. RATNER: First of all, the wasting time,
21 there's --

22 THE HEARING OFFICER: I don't understand why
23 you're referring to it as wasting time.

24 MR. RATNER: That's what Mr. Andriano just
25 said. He asked why I'm wasting time. It's going

1 to take less than five minutes. We have all day.

2 THE HEARING OFFICER: You were getting ready
3 to go into dyslexia when we already have a --

4 MR. RATNER: No, I'm not. I just want to show
5 that the School Board's own personnel, the dyslexia
6 specialist, is the one who wrote to Mrs. REDACTED
7 dyslexia is a medical diagnosis, and to the extent
8 the School Board is attempting to imply that it had
9 impact on whether she was eligible for special
10 education services, I would like to make sure it is
11 clear that they had previously advised in writing
12 it is not.

13 THE HEARING OFFICER: What dyslexia is --
14 you're saying -- may I see the document?

15 MR. RATNER: You certainly may.

16 THE HEARING OFFICER: But there has been a
17 stipulation that dyslexia is not an issue.

18 MR. RATNER: Well, that's not the stipulation.

19 THE HEARING OFFICER: Or that there has been
20 no medical -- I don't have the note specifically in
21 front of me, but from my recollection, it was that
22 dyslexia -- that there has been no medical
23 diagnosis of dyslexia.

24 MR. RATNER: That is correct. And this is
25 completely consistent with that. I just think it's

1 important to have it in the record.

2 MS. RATNER: And there's an important dispute
3 as to whether that matters, and there was a long
4 discussion between us and Mr. Andriano who said
5 that it does matter. What this shows is that
6 Ms. Lennox represented to Mrs. REDACTED that the
7 School Division -- had she come in with some
8 neurologist's report that said dyslexia, that would
9 have made no difference at all, because that is not
10 what they considered.

11 MR. ANDRIANO: Second line?

12 MR. RATNER: Second page after the italics.
13 You can look at the whole thing, but this is what
14 I'm interested in.

15 And Ms. Freeman, while you're reading that, I
16 will note it was not in our book, but it was
17 previously produced. That's why there's a Bates
18 number on it. It was produced before the five-day.

19 MS. OWENS: Ms. Freeman, there's been no --
20 there's nothing here that would indicate that this
21 is a rebuttal document.

22 THE HEARING OFFICER: I didn't want to speak
23 out of turn here, but I just don't see how this is
24 any different than what the testimony has been from
25 the School System.

1 MR. RATNER: I mean, that's very possible.

2 THE HEARING OFFICER: Maybe I'm not getting
3 something here.

4 MR. RATNER: Or maybe I'm not getting
5 something, but we think it's an important document.
6 I can have Mrs. REDACTED identify it. I don't think
7 there's any dispute that --

8 THE HEARING OFFICER: It came from the School
9 System.

10 MR. RATNER: And we would like it in the
11 record, please.

12 THE HEARING OFFICER: Do you have any
13 objection?

14 MR. ANDRIANO: It's not rebuttal evidence.

15 THE HEARING OFFICER: They say that this was
16 in their documents before.

17 MR. RATNER: That's correct, in response to a
18 subpoena is what I'm saying. They subpoenaed us,
19 and we produced this. That's why it has a Bates
20 number on it.

21 MS. OWENS: So, again, Ms. Freeman, this is
22 not rebuttal evidence.

23 THE HEARING OFFICER: I don't see the purpose
24 for which it's being offered. We had a stipulation
25 that there has been -- I don't have it in front of

1 me, again, word for word, but I believe it was to
2 the effect that there has been no medical diagnosis
3 of dyslexia, and that was a stipulation.

4 MR. RATNER: That's right. Then yesterday, I
5 believe, there was a fairly long discussion about
6 whether or not dyslexia is a specific learning
7 disability, and that's what had led to the
8 stipulation. So, again, I understand if you don't
9 see the purpose.

10 THE HEARING OFFICER: I don't see the purpose.
11 I'm going to give it back to you.

12 MR. RATNER: That's fine. I would just like
13 to note we offered it as Parents' Exhibit 127.

14 THE HEARING OFFICER: And I will note your
15 exception.

16 MR. RATNER: Thank you.

17 MS. RATNER: Todd, do you want to read out the
18 Bates numbers so the transcript's clear?

19 MR. RATNER: Yes. Thank you.

20 It's a two-page document, Bates number
21 **REDACTED** 000496 and 497 and we offered it as Parents'
22 127 and it was not accepted.

23
24 (Parents' Exhibit No. 127 offered and
25 rejected.)

1

2

THE HEARING OFFICER: Let me just say something on the record. When I asked those questions of the psychologist, Ms. McCarthy, dyslexia, first of all, I completely forgot, again, that we had a stipulation that there was no medical diagnosis of dyslexia. And from what I recall, she explained -- and I had confusion about orthographic -- the orthographic piece --

10

MR. RATNER: Yes.

11

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THE HEARING OFFICER: -- from what her report said, and that's why I was comparing -- I think I said something to the effect of wouldn't it be easy to confuse orthographic reasoning or the orthographic piece of it for dyslexia itself. She was explaining that the orthographic part of dyslexia is included in dyslexia, but it's not -- dyslexia has so many variations and parts of it.

19

MR. RATNER: I understand that very much.

20

21

THE HEARING OFFICER: But I brought that -- my point is, I brought that up.

22

MR. RATNER: That's right.

23

THE HEARING OFFICER: Not counsel.

24

25

MR. RATNER: But it was addressed and I personally thought it might be helpful -- and

1 please do not take this as a criticism in any
2 way --

3 THE HEARING OFFICER: I'm not taking anything
4 as a criticism.

5 MR. RATNER: There's been a lot of documents,
6 there's been a lot of testimony, there was a
7 stipulation, which may not be fresh in your mind,
8 and I thought it might be helpful that you have a
9 document in front of you that says exactly what we
10 said.

11 THE HEARING OFFICER: All right. Again, I
12 think we have all our documents in tow. They are
13 in the exhibit books, and I will probably somehow
14 get all of them out of here and back to my office
15 and look over all the admitted --

16 MR. RATNER: You just gave that one back to
17 us, so I want to give you a chance to ask for it if
18 you change your mind.

19 THE HEARING OFFICER: Let's go on to the next
20 part.

21 BY MR. RATNER:

22 Q Two points from Ms. McCluskey's testimony
23 yesterday, one had to do with the MAPs testing, and I
24 believe it was the very conclusion of Ms. McCluskey --
25 my examination of Ms. McCluskey.

1 And, again, Mr. Andriano is looking at his
2 watch. If he's concerned about the time, I would note
3 I was supposed to have latitude without objections.

4 THE HEARING OFFICER: I don't even know if --
5 my watch is wrong, so I have to look at my phone.

6 So let's go ahead. But if I recall correctly,
7 I believe you did say approximately 20 minutes.

8 MR. RATNER: That was an estimate.

9 THE HEARING OFFICER: Somebody else is going
10 to have to keep track because my watch is not
11 right.

12 MR. RATNER: That was after you said you
13 wanted objections to be limited. I can't control
14 all this other stuff.

15 THE HEARING OFFICER: All right. Let me get
16 out my phone so I know. I think we've been going
17 now for, what, about 10, 12 minutes or so.

18 So go ahead.

19 BY MR. RATNER:

20 Q I asked Ms. McCluskey about the MAPs in the
21 fall the 2020. Do you recall that testimony?

22 A Yes.

23 Q And her testimony was, as I understand, that
24 REDACTED could take the MAPs with all the accommodations
25 that were in her IEP; she just chose not to. Do you

1 recall that testimony?

2 A Yes.

3 MS. OWENS: I object. That's
4 mischaracterizing Ms. McCluskey's testimony "that
5 she chose not to."

6 MR. RATNER: What's your recollection of what
7 she said then?

8 MS. OWENS: That's not what she stated. She
9 stated that -- she stated that it was her -- what I
10 recall is that the Parent indicated that she did
11 not want -- she couldn't recall the specifics, but
12 she believes that the Parent may have indicated
13 that she did not want [REDACTED] to take the MAP.

14 MS. RATNER: Then this rebuts that even more.

15 MR. RATNER: We have a disagreement with
16 Ms. Owens, so you are going to have to decide that.
17 We have a document, same situation, previously
18 produced in response to our subpoena but not in our
19 exhibit book because we did not realize we would
20 have to rebut this.

21 THE HEARING OFFICER: Thank you. Let the
22 record reflect then that counsel has handed me an
23 email from [REDACTED], and the subject -- the date
24 of it was October 1st, 2020, and the subject is
25 math MAPs -- or the MAP, I believe, exam is what

1 you were -- I don't know if it's proper to call it
2 an exam --

3 MR. RATNER: I think assessment is probably --

4 THE HEARING OFFICER: Assessment. Thank you.

5 And Mrs. REDACTED says, I will try it with her again
6 when I get home from work tonight. I would like
7 the math ones to get done, if at all possible.

8 Is that what you said in response to whether
9 or not REDACTED would take the MAP?

10 THE WITNESS: Yes.

11 MR. RATNER: There's some additional
12 information within this document. I would like to
13 make sure you highlight --

14 THE HEARING OFFICER: I'm sorry, I interrupted
15 you.

16 From Christine McCluskey to Mrs. REDACTED and it
17 says, I just spoke with the administration or the
18 admin and because there is a MAPs window --

19 MR. RATNER: I don't mean to interrupt, but it
20 goes from the bottom to the top if you want to go
21 in time order.

22 THE HEARING OFFICER: All right. Let me start
23 again.

24 MR. RATNER: So it starts on September 30.

25 THE HEARING OFFICER: September 30.

1 [As read] I'm so sorry. I just heard you ask REDACTED
2 to do the MAPs. This was from Mrs. REDACTED to,
3 I assume, to Ms. McCluskey. I just heard you ask
4 REDACTED to do the MAPs. As I stated in her IEP, she
5 needs a teacher to assist her with these. I tried
6 the other day, and it was an epic fail. Please let
7 me know how we should proceed. Thank you.

8 Did you say that?

9 MR. RATNER: I just wanted to clarify -- and
10 again, I'm not fussing, but it doesn't say "as I
11 stated in her IEP" as you read it. It says "as
12 stated in her IEP."

13 THE HEARING OFFICER: Okay. Thank you. I
14 didn't have my glasses on.

15 Right. So then after September 30, we have
16 another email from Mrs. REDACTED to --

17 MR. RATNER: It's actually Ms. McCluskey
18 responding to Mrs. REDACTED in the middle of the page.

19 THE HEARING OFFICER: Okay. [As read] I just
20 spoke with the administration because there is a
21 MAPs window. She will miss the fall MAPs
22 testing -- this is from Ms. McCluskey. She will
23 miss the fall MAPs testing if she doesn't take the
24 math this week, but she can take it in the winter.
25 Her IEP states that she will have verbal prompting

1 to keep her focused, which you can do, if you'd
2 like, and read it to her and she does have the
3 extra time if she wants, as well as the ability to
4 use her dry erase board if you want to give math a
5 try again this week. Again, if not, no biggie. We
6 will do her winter MAPs.

7 MR. RATNER: So the point I wanted to make
8 sure was clear that there's an accommodation,
9 according to Ms. McCluskey, that REDACTED will have
10 verbal prompting to keep her focused, and
11 Ms. McCluskey said that Mrs. REDACTED could provide
12 that if she likes.

13 THE HEARING OFFICER: Any objection to this
14 document?

15 MR. ANDRIANO: I don't believe it's a complete
16 document. I mean, I would have to ask
17 Ms. McCluskey.

18 THE HEARING OFFICER: And Ms. McCluskey is not
19 here.

20 MR. ANDRIANO: We will find out before we
21 leave today because I'm sure there was a response
22 to this.

23 MS. RATNER: What makes you sure there was a
24 response to this?

25 MR. ANDRIANO: Because knowing Ms. McCluskey,

1 she responded to Mrs. REDACTED's email at the top.

2 But we are going to check.

3 MR. RATNER: Great. We've got all day.

4 We'd like to offer this as Parents 128,
5 please.

6 THE HEARING OFFICER: And you object because
7 you feel that this is not necessarily the complete
8 document and that it's taken out of context?

9 MR. ANDRIANO: I do. I do believe --

10 THE HEARING OFFICER: It does color her
11 testimony yesterday.

12 MR. ANDRIANO: I don't know that it colors her
13 testimony. She testified, I believe, that the MAPs
14 assessment -- the winter MAPs assessment -- because
15 they were virtual at that point in time, they
16 weren't doing them in school. They were doing them
17 from home. That it was available and --

18 MR. RATNER: With the accommodations, that's
19 correct. We agree with that. That's what
20 Ms. McCluskey said.

21 MS. OWENS: There's nothing in this document
22 that would indicate as far as who would be
23 providing the accommodations during a virtual
24 session because of a global pandemic.

25 MS. RATNER: Correct.

1 MR. RATNER: That's right. That's our point.
2 She's very clearly said, we are not going to
3 provide this accommodation.

4 MS. OWENS: That's not what it says at all.

5 MR. RATNER: You're free to provide verbal
6 prompting to her.

7 MR. ANDRIANO: We don't know the context --

8 MR. RATNER: Ms. Freeman, I am so sorry, but
9 we're offering evidence. If they have other
10 evidence -- it's not objectionable to say that --

11 THE HEARING OFFICER: They are saying that
12 they don't know if there were additional comments
13 by Ms. McCluskey because they don't have any way to
14 know.

15 MS. RATNER: Yes, they do, because they
16 produced every email --

17 MR. RATNER: They produced emails to us. It's
18 not our burden to show them -- you may recall a lot
19 of discussion from Mr. Andriano, for example, about
20 emails they produced to us that they weren't sure
21 if it was a complete document or not. It is not
22 the Parents' burden to satisfy every curiosity they
23 have. If they think there's an additional email,
24 they are welcome to find it. If it's not been
25 produced, we can deal with all that. This is

1 clearly a complete thread. There may have been
2 things that happened after October 1st at 9:24 a.m.
3 That is not a reason -- that is not a proper
4 objection or a reason to exclude.

5 THE HEARING OFFICER: I'll overrule the
6 school's objection to this document and take it.

7 MR. RATNER: Thank you.

8

9 (Parents' Exhibit No. 128 admitted.)

10

11 BY MR. RATNER:

12 Q Mrs. REDACTED, do you recall the statements from
13 Ms. McCluskey about REDACTED lying instead of doing her
14 work?

15 A Correct.

16 Q Okay. And I'd like to go to School Board
17 Exhibit 29 -- excuse me, 28. My apologies. This was a
18 document that Ms. McCluskey testified about yesterday,
19 correct?

20 A Correct.

21 Q And this was the document in which she
22 acknowledged that she, Ms. McCluskey, wrote that she,
23 REDACTED, will lie instead of doing her work, correct?

24 A Correct. That's what it says.

25 Q And do you see the date of the interview at

1 the top right of the page?

2 A Yes. January 21, 2021.

3 Q Did Ms. McCluskey, prior to that IEP meeting
4 or the eligibility meeting when you reviewed these
5 documents, had Ms. McCluskey ever expressed to you a
6 concern about REDACTED lying to avoid work?

7 A Not to my recollection.

8 Q Okay. And, in fact, did you had a
9 communication with her just a few days later in which
10 she seemed to indicate just the opposite?

11 A Yes.

12 Q Okay. I'd like you to turn in the Parents'
13 book, I believe it's Volume 2 and Exhibit 51 and
14 specifically pages 626 and 627. Tell me when you have
15 that.

16 THE HEARING OFFICER: Wait a minute. What
17 page are you?

18 MR. RATNER: 626 and 627. I think it's the
19 last two pages in that tab.

20 MR. ANDRIANO: Which tab number?

21 MR. RATNER: 51.

22 MR. ANDRIANO: Binder 2?

23 MR. RATNER: I think one of the issues is you
24 didn't necessarily put them in the same volumes I
25 did. You just printed them out, but it's tab 51.

1 MS. OWENS: Which Bates number?

2 MR. RATNER: It's not the Bates number. It's
3 the Parents Exhibit Number 626 and 627. It's the
4 very last two pages.

5 Do you have it, Ms. Freeman?

6 THE HEARING OFFICER: That's what I'm looking
7 for. I thought you said page 621.

8 MR. RATNER: 626 and 627, should be the last
9 two pages.

10 THE HEARING OFFICER: All right. And this is
11 the email from REDACTED dated January 27, 2021,
12 11:18 in the morning, and it's to Mr. Mueller.

13 MR. RATNER: Right. Again, you recall you
14 have to read from the bottom up. So she forwarded
15 a communication that she had with Ms. McCluskey to
16 Mr. Mueller.

17 THE HEARING OFFICER: All right.

18 MR. RATNER: So you've got to read from the
19 end to the beginning.

20 THE HEARING OFFICER: Let me go back here.
21 But Mr. Mueller was the prior attorney, wasn't he?

22 MR. RATNER: That's right. We're not
23 interested in the Mr. Mueller part.

24 THE HEARING OFFICER: Oh, okay. But you just
25 directed me to 626.

1 MR. RATNER: And 627.

2 THE HEARING OFFICER: So where do I start
3 again?

4 MR. RATNER: It goes from the back to the
5 front.

6 THE HEARING OFFICER: Let's see. Tuesday,
7 January 26, 2021, 11:31 a.m., REDACTED wrote,
8 I'm working from home today in an effort to support
9 REDACTED.

10 MS. OWENS: Ms. Freeman, this email has come
11 from Mr. Mueller and was forwarded, and there's no
12 way for the School Board to know that this is the
13 full exchange between the Parent and Ms. McCluskey.

14 MR. RATNER: Again, that's not a proper basis
15 for objection or exclusion of evidence. It's
16 not --

17 THE HEARING OFFICER: I believe it is. It's
18 not a complete document.

19 MR. RATNER: Then we can ask Mrs. REDACTED, she's
20 right here, instead of saying we don't know so it
21 should be excluded. Mrs. REDACTED's testimony is
22 evidence.

23 THE HEARING OFFICER: Okay.

24 MS. OWENS: So the dilemma that the School
25 Division is having with this whole process,

1 Ms. Freeman, is that this is not rebuttal. This is
2 really not rebuttal evidence. Certainly, if there
3 were questions about -- in an effort to challenge
4 the testimony provided by any School Board witness,
5 this would have been an appropriate document to
6 show to Ms. McCluskey and say to, Ms. McCluskey, do
7 you recall sending this email to the parent.

8 Now we don't have the benefit of
9 Ms. McCluskey's testimony, and we have an
10 interpretation of a document that -- an exchange
11 between the parent and Ms. McCluskey, and this is
12 not -- this is not a rebuttal document. This is
13 simply an email that could have been shown to
14 Ms. McCluskey during the course of her examination
15 yesterday.

16 MR. RATNER: If I could just be heard briefly.

17 THE HEARING OFFICER: Go ahead.

18 MR. RATNER: Mrs. REDACTED is on the email. It
19 is a communication between Mrs. REDACTED and
20 Ms. McCluskey. They seem to want always say this
21 is the only witness we can ask about this; this is
22 the only witness we can ask about. Mrs. REDACTED is a
23 part of this email. She is a proper witness to
24 authenticate it. She is a proper witness to
25 describe the information. You can interpret it.

1 If they feel they need to call Ms. McCluskey to
2 rebut something now that Mrs. REDACTED says, by all
3 means they are free to do so. But the idea that
4 this email, in which Ms. McCluskey says, "I never
5 doubt that she is not working hard, but it is
6 confusing to try to understand what she is
7 thinking" is not rebuttal, then I guess I don't
8 understand what rebuttal is.

9 MS. OWENS: That's not rebuttal. This is not
10 a rebuttal document.

11 MR. RATNER: I mean, again --

12 MS. RATNER: On what legal basis are you
13 saying that?

14 MR. RATNER: Right. Ms. Owens can say it all
15 she wants. That doesn't make it so.

16 THE HEARING OFFICER: All right. The document
17 is in the evidentiary record; however,
18 Ms. McCluskey is not here so -- I have not read
19 this document, so I have no idea what you're
20 talking about.

21 MR. RATNER: And we would like you to. Right.
22 So that's why I would like to ask Mrs. REDACTED about
23 it. She's part of this email exchange, and she's
24 here to talk about it.

25 THE HEARING OFFICER: This is to Mr. Mueller.

1 Mr. Mueller is not testifying.

2 MS. RATNER: There's no substance to
3 Mr. Mueller. It was forwarded.

4 MR. RATNER: I would be delighted to explain
5 that to you. This is a communication between
6 Mrs. REDACTED and Ms. McCluskey that Mrs. REDACTED
7 thought was significant, so she forwarded it to
8 Mr. Mueller. We are not asking you about
9 Mr. Mueller.

10 THE HEARING OFFICER: All right.

11 MR. RATNER: We are asking you about the
12 communication between -- you can cross out where
13 she forwarded it to Mr. Mueller. We're not
14 interested in that. We could have redacted that,
15 perhaps.

16 THE HEARING OFFICER: Okay. I'll accept it
17 with the caveat that you could have asked
18 Ms. McCluskey about this document if you were going
19 to present it to me and give her a chance to
20 explain it. For now, I'm going to accept the
21 document into the record, but I don't really need
22 any -- I don't need any additional --

23
24 (Parents' Exhibit Tab 51, Pages 000626 and
25 000627 admitted.)

1 MR. RATNER: That's all we were going to ask.
2 I just ask that you read the entire exchange.
3 That's all.

4 THE HEARING OFFICER: Again, this technically
5 is not rebuttal, but because -- as I said, your
6 witness -- you had a chance to present your case,
7 and this witness had one -- at least one lengthy
8 opportunity to testify so --

9 MR. RATNER: So the only person I can ask
10 about an email that contains multiple parties is
11 the person they want me to ask about?

12 THE HEARING OFFICER: No.

13 MS. OWENS: This document is not rebuttal
14 evidence.

15 And furthermore, it's hearsay. To the extent
16 that Mr. Ratner is asking Mrs. REDACTED to interpret
17 or to tell you what Ms. McCluskey has stated.

18 THE HEARING OFFICER: That's not what I'm
19 going to let him do is interpret.

20 MR. RATNER: I'm not asking that. You can
21 read the entire exchange, and you can interpret for
22 yourself.

23 THE HEARING OFFICER: You have it in your
24 exhibit book and you've directed my attention to it
25 and I'm going to read it over, but we don't need to

1 go into it any further.

2 MR. RATNER: I don't intend to. They keep
3 talking about it.

4 THE HEARING OFFICER: Okay. Let's move on.

5 BY MR. RATNER:

6 Q The last thing I would like to address with
7 you, Mrs. REDACTED, are REDACTED's grades. You've heard a lot
8 of testimony over the last seven days about how REDACTED
9 made straight A's at the end of the fourth grade; do
10 you recall that? Excuse me. The end of fifth grade, I
11 apologize.

12 A Yes.

13 Q Okay. And did you have reasons to doubt the
14 validity of the grades that the school was giving? And
15 I'm not asking you to explain why, but were you
16 concerned about that?

17 MS. OWENS: Objection. This witness cannot
18 testify with regard to the so-called validity of
19 grades. One, she has not -- she does not have the
20 expertise. She has not been identified as an
21 expert witness.

22 MR. RATNER: Ms. Freeman, I'm going to jump in
23 here.

24 THE HEARING OFFICER: Don't interrupt
25 Ms. Owens.

1 MR. RATNER: I didn't ask her these questions.
2 That's why we have had so many long objections.

3 MS. OWENS: Mr. Ratner --

4 THE HEARING OFFICER: The basic rule is we
5 have to be polite, and we can't speak over each
6 other. The main reason for that is so that the
7 court reporter can get all of our communication.

8 MR. RATNER: I very much understand that. But
9 what has happened for the last seven days is
10 Ms. Owens objecting --

11 THE HEARING OFFICER: Again, commentary.

12 MR. RATNER: No, not commentary. Ms. Owens
13 has objected to questions I haven't asked, and
14 we've ended up spending 30 minutes or so -- just
15 like now where I wasn't going to ask any more
16 questions.

17 THE HEARING OFFICER: Let her say what her
18 objection is just for the purpose of getting it on
19 the record, and then you can say whatever you like.

20 MS. OWENS: I will just point out that I
21 waited until Mr. Ratner finished his question.

22 My objection remains that this witness is not
23 an expert witness. She lacks any foundational
24 knowledge to determine whether grades are so-called
25 valid, as Mr. Ratner claims. So there's no basis

1 for any testimony offered by this witness with
2 regard to the validity of grades.

3 MR. RATNER: Right.

4 THE HEARING OFFICER: I wrote down -- and then
5 I think I heard the objection -- are grades, and I
6 thought you said the word "valid."

7 MR. RATNER: I did. But I'm not asking her if
8 she's authorized or has the --

9 THE HEARING OFFICER: You said, are the grades
10 valid.

11 MR. RATNER: That's not what I said. If I can
12 please finish. I asked if she had reason to
13 suspect the grades were not valid. And sometimes,
14 as I'm sure Ms. Freeman can understand, there's
15 more than offering it for the truth of the matter
16 asserted. She has a suspicion the grades were not
17 valid, and it explains the behavior she took next
18 that I think is relevant. It doesn't have anything
19 to do with whether or not her opinion about the
20 grades were valid is accurate or not.

21 There's important information that is relevant
22 to this case that does not require her to be an
23 expert about whether the grades are valid to
24 explain what she did to investigate those grades,
25 and it is relevant to this case. You have said you

1 would give us latitude, and I don't understand why
2 she's not being able to explain to you the efforts
3 she made to look into the grades. It doesn't mean
4 she's right that they weren't valid. But it is
5 relevant why she wanted to look into the grades,
6 and that's what I would like to explain.

7 And, again, to Ms. Owens' point, I hope you
8 understand now, none of what she said has anything
9 to do with the question I asked.

10 THE HEARING OFFICER: Originally I asked you
11 if your question was -- and I believe you said that
12 you had not finished the question. But I said, did
13 you just ask her if the grades were valid.

14 MR. RATNER: Right.

15 THE HEARING OFFICER: V-A-L-I-D, so we're not
16 misunderstanding.

17 MR. RATNER: No. Let me be very clear. You
18 asked if I said the word valid with the grades.

19 And I said, Yes, I did.

20 THE HEARING OFFICER: Okay.

21 MR. RATNER: But I'm not asking her if she's
22 an expert on whether the grades were valid. It's
23 whether she had a concern about it and what she did
24 because of that that is relevant, whether or not
25 she's right that they are valid or invalid. Am I

1 making sense?

2 THE HEARING OFFICER: You're making sense.
3 However, we go back to the original premise.
4 Whether or not grades are valid is the subject that
5 an expert witness testifies about.

6 MR. RATNER: But she's not testifying whether
7 grades are valid. She's testifying about --

8 THE HEARING OFFICER: You just asked her if
9 the grades were valid.

10 MR. RATNER: I didn't. I didn't. That's what
11 I'm trying to be clear about. I'm asking her if
12 she had a reason to suspect that they were not
13 valid, and then I will ask what she did in response
14 to that. I'm not asking her to tell you that. You
15 shouldn't listen to the grades; you don't have to
16 listen to anything about that. There is
17 information about her asking for grades from the
18 school that is relevant to this, whether or not
19 they are valid or not. I don't know how I can say
20 it any more clearly. This has nothing to do with
21 her ability to challenge the validity of the
22 grades. It has to do with her personal belief and
23 what she did as a result of that belief.

24 THE HEARING OFFICER: This is what I'm going
25 to say, I told you originally I would give you

1 latitude. However, I'm going to -- and I
2 understand counsel's objection that she's not in a
3 position to tell me whether or not grades are
4 valid. I'm not --

5 MR. RATNER: And I'm not going to ask her to.

6 THE HEARING OFFICER: I understand where
7 you're --

8 MR. RATNER: I just want to --

9 MS. OWENS: Please let the Hearing Officer
10 respond.

11 MR. RATNER: I'm so sorry, what was that?

12 MS. OWENS: I wanted to hear what
13 Ms. Freeman's position is on the objection.

14 THE HEARING OFFICER: However, I'm going to
15 listen to what she tells me about what she
16 suspected, but I'm going to -- when I go back and
17 consider all of the evidence, I'm going to apply
18 the rule that is a very long-standing rule that
19 experts testify about the validity of grades and
20 they did. I will apply that precept to the -- to
21 your statement. However, I'm going to listen to
22 what she says -- or what she suspected.

23 MR. RATNER: To be clear, that's all I've ever
24 been asking.

25 THE HEARING OFFICER: But, again, counsel's

1 objection is extremely compelling.

2 MR. RATNER: Okay. I respectfully disagree,
3 but I appreciate the latitude.

4 MS. OWENS: Please note our objection,
5 Ms. Freeman.

6 THE HEARING OFFICER: Yes, I'm going to note
7 counsel's objection to my ruling.

8 BY MR. RATNER:

9 Q Did there come a time when the School Board,
10 anyone from Chesterfield County Public School,
11 indicated to you that REDACTED's grades had improved
12 markedly once she came back to school in person?

13 A I guess I'm not understanding. During this
14 process?

15 Q Do you recall that at the beginning of fifth
16 grade she had F's and D's?

17 A Yes.

18 Q And at that point did you begin the process
19 of requesting a private placement for REDACTED with
20 Chesterfield County Public Schools?

21 A Yes, in November.

22 Q Okay. And that was the November 2020 IEP
23 Amendment meeting that we've discussed at length,
24 correct?

25 A Correct.

1 Q Okay. And after that meeting at some point,
2 did REDACTED's grades improve, according to the School
3 Board?

4 A Yes.

5 Q Had REDACTED at any time prior to that point in
6 her Chesterfield County Public School career received
7 straight A's?

8 A No.

9 MS. OWENS: Objection.

10 THE HEARING OFFICER: I'm going to note a
11 continuing objection to this testimony.

12 MS. OWENS: Thank you.

13 MR. RATNER: The report cards are in the
14 record.

15 THE HEARING OFFICER: The report cards are in
16 the record. I'm going to let Mom tell what she
17 suspected. However, noting a continuing objection
18 to this testimony from the School System, which I
19 sustained.

20 MS. OWENS: I will note Mr. Ratner --

21 THE HEARING OFFICER: I sustained your
22 objection.

23 MS. OWENS: Okay.

24 MR. RATNER: I thought you said I could ask
25 her questions.

1 THE HEARING OFFICER: Yes, I'm saying, I'm
2 giving you latitude to do that even though I
3 sustained their objection. Because that's what I
4 meant by when I asked you whether -- I discussed
5 with you whether or not she is the proper witness
6 to identify the validity of the grades.

7 MR. RATNER: I'm not trying to do that with
8 her. That's not --

9 THE HEARING OFFICER: That's what I meant by
10 latitude. I'm going to take their objections to
11 this testimony because they are valid objections
12 regarding the grades and whether or not they
13 were -- I don't know exactly what she's going to
14 tell me.

15 MR. RATNER: That's part of the issue.

16 THE HEARING OFFICER: But I'm going to apply
17 the rule about expert testimony when I consider
18 this. And I'll listen to your testimony. I'm
19 still sustaining their objection for the record.

20 MR. RATNER: Thank you.

21 THE HEARING OFFICER: But I want the record to
22 reflect that I did give her the opportunity to tell
23 me what her suspicion was.

24 MS. RATNER: May I just give one --

25 THE HEARING OFFICER: I know that sounds

1 convoluted but --

2 MS. RATNER: May I give one hypothetical to
3 show kind of what we're trying to get at? Because
4 I don't think you need an expert to say Mom
5 received a grade of A and there's a list of ten
6 assignments and nine of them are not even turned in
7 at all. That doesn't seem like you need an expert
8 to say -- it's not a scientific -- it's like a
9 basic math or a fact that any parent would know and
10 be concerned about, and this is what -- I mean,
11 it's torturous to try to get to it, but this is
12 what she was trying to say.

13 She -- suddenly REDACTED is making A's after
14 making F's. Mom is, like, I'm shocked. I haven't
15 seen this work. I don't know what this is based
16 on. She asked the teacher, where -- how did REDACTED
17 make an A on X? How did she make an A plus on the
18 ocean motion or particular assignments? And then
19 no records are provided, or it is stated to her,
20 REDACTED didn't turn that in. So I don't think an
21 expert is needed to say giving somebody an A for
22 something that wasn't done is questionable as to
23 whether that's a valid grade.

24 THE HEARING OFFICER: Ms. Ratner, I understand
25 that that's your premise, that that's your

1 hypothesis, if you will. However, I think we've
2 had quite a bit of testimony from both parties
3 regarding the grades, the validity of grades,
4 whether or not this occurred as you said or you
5 proffered that it occurred and that's what --

6 MS. RATNER: This is what she's trying to
7 testify about.

8 THE HEARING OFFICER: I'm going to go back and
9 look at all of the documents. However, I did
10 sustain an objection to school counsel's motion
11 that expert witnesses describe the validity --
12 after they are certified, after they are qualified
13 in particular topics, they are able to tell us what
14 those variations are. If that's credible or not is
15 what I'm going to have to decide. Okay? So
16 that's -- that's my quagmire is when I go back and
17 look at all of the documentation within those
18 boundaries. So that's what I'm saying.

19 I'm going to give Mrs. REDACTED an opportunity to
20 tell me what she wants to tell me but -- because I
21 think that to have a fair hearing, you need to be
22 able say what you think.

23 THE WITNESS: I understand.

24 THE HEARING OFFICER: But I have to do my job
25 as well and apply the rules when I go back.

1 THE WITNESS: And I understand. I will try to
2 stick to facts. I understand.

3 THE HEARING OFFICER: Go ahead.

4 BY MR. RATNER:

5 Q So I think you understand the question that
6 I'm getting at.

7 Did you try to get information about REDACTED's
8 grades after you heard that they had improved?

9 A Yes. So we know REDACTED was failing in the
10 fall, and when she was receiving much higher marks, A's
11 and B's, I emailed and questioned Ms. Houston because I
12 was surprised and had not seen school work. So I
13 wanted to --

14 Q Let me stop you just right there.

15 MR. RATNER: Ms. Freeman, there are lots of
16 pages in the book that address this. What I would
17 like is Mrs. REDACTED to tell you in her own words
18 what she recalls rather than going to pages and
19 pages of the hearing book because that's when it
20 seems to all get muddled with it's not complete,
21 who is it from. We have been trying to get this
22 evidence to your attention this entire time. I
23 would like her to have an opportunity to tell you
24 interrupted. So I'm not going to direct her to
25 those pages.

1 THE HEARING OFFICER: That's fine. That's why
2 I told you within certain confines --

3 MR. RATNER: Right.

4 THE HEARING OFFICER: -- I'm going to let her
5 tell me something. I don't want to interrupt you,
6 Mr. Ratner, but let me hear from her.

7 MR. RATNER: Right. But I just wanted to
8 say --

9 THE HEARING OFFICER: And there's a continuing
10 objection from the School System about her
11 testifying at all again. So go ahead.

12 MR. RATNER: There are emails in the book if
13 you would like to see them. I would prefer not to
14 address them, if that's okay.

15 THE HEARING OFFICER: All right. That's fine.
16 Go ahead.

17 THE WITNESS: So I asked Ms. Houston because I
18 was curious what made -- what changed and what made
19 up the grades. And her response -- I asked her --

20 MS. OWENS: I'm going to object the hearsay,
21 any hearsay testimony provided.

22 MR. RATNER: Again, she's not offering it for
23 the truth of the matter asserted. She's a party to
24 the conversation. This is every classic hearsay
25 exception.

1 THE HEARING OFFICER: Who is "her"? Oh, I'm
2 sorry.

3 MR. RATNER: Ms. Mottley and Ms. Houston.

4 THE WITNESS: Communicated emails that are in
5 here to me.

6 MR. RATNER: Right. Again, we're not offering
7 it for the truth of the matter asserted.

8 THE HEARING OFFICER: Overruled. Let's just
9 get to it.

10 THE WITNESS: I requested copies of work. She
11 could not produce them and directed me to --

12 THE HEARING OFFICER: Who is "she could not"?

13 THE WITNESS: Sorry. Ms. Houston could not
14 produce them. She directed me to Canvas, which is
15 the module that a lot of the assignments are in and
16 told me I could find them there. I looked in
17 Canvas, and I told her I'm extremely confused and
18 cannot find anything. To which she responded that
19 she had archived all of the work; that's why I
20 couldn't see it. Then she directed me to REDACTED's
21 Google drive. I additionally said, this is
22 confusing because the title of the documents does
23 not line up with her parent view grades. Maybe
24 they are titled something different.

25 I spent hours trying to go through any

1 paperwork, digging into the three platforms online.
2 So I sent her a spreadsheet; these are the
3 assignments, these are the grades. Can you produce
4 what is missing?

5 She printed what she had, and it still did not
6 make sense. Then we had our meeting in February.

7 THE HEARING OFFICER: The IEP meeting?

8 THE WITNESS: Correct.

9 THE HEARING OFFICER: On 2/19?

10 THE WITNESS: That's correct.

11 MR. RATNER: That's exactly right.

12 MR. ANDRIANO: Ms. Freeman, just to add again,
13 this is improper rebuttal. She's trying to rebut
14 Ms. Houston's testimony. Ms. Houston was their
15 witness. She wasn't our witness.

16 MR. RATNER: I think we've already covered
17 that.

18 THE HEARING OFFICER: I will note a continuing
19 objection to all of this testimony. Go ahead.

20 That was the 2/19 IEP meeting?

21 THE WITNESS: Correct. And I continued to ask
22 for documentation, her school work to be produced.
23 I then informed Ms. Mottley that I was looking for
24 this work. She assured me that the school work
25 that had been archived could be retrieved from

1 archive. I continued to request it, and it was not
2 received. My final request was June or July, to
3 which Ms. Mottley responded that I could get the
4 school work through FERPA and FOIA. So I had to
5 pay to receive this school work. What I received
6 via FOIA was a large number of documents from
7 Canvas, many of the assignments were not completed
8 that she received grades on.

9 BY MR. RATNER:

10 Q And just as a -- to close that out, if you
11 could look at School Board 54, the second page, which
12 is page 258 that's already in evidence. I can help you
13 get there if you need assistance.

14 THE HEARING OFFICER: Which exhibit were you
15 talking about?

16 MR. RATNER: School Board 54 and the second
17 page of 54.

18 BY MR. RATNER:

19 Q Is this the letter from Ms. Mottley advised
20 you that you can receive the documents you asked for
21 through FOIA and FERPA?

22 A Yes.

23 Q Okay. And you actually subsequently received
24 documents in response to this, right?

25 A Yes.

1 Q Do you remember approximately how much you
2 had to pay to receive those records related to your
3 child?

4 MS. OWENS: Objection. Relevancy.

5 THE HEARING OFFICER: Again, I've noted a
6 continuing objection. I'll let her go on.

7 What is it that you were -- we're still on 54,
8 right?

9 MR. RATNER: Well, I just wanted to make clear
10 that this was the letter in which Ms. Mottley
11 advised her she could receive the information.

12 THE HEARING OFFICER: This is the FERPA
13 request letter.

14 MR. RATNER: That's right. That's it. It's
15 in the record already. Just trying to connect it
16 up.

17 THE HEARING OFFICER: All right.

18 BY MR. RATNER:

19 Q So Mrs. REDACTED, I believe that concludes
20 everything that I wanted to cover with you. Thank you
21 so much. But there is one more area.

22 You were here yesterday when Ms. McCarthy
23 described her observation of REDACTED?

24 A Correct.

25 Q And did you hear Ms. McCarthy say that based

1 on her observation REDACTED was called on in a general
2 education class 25 times in a 30-minute period?

3 A Yes.

4 Q Have you ever discussed with REDACTED what makes
5 her anxious in the school environment?

6 A Yes.

7 Q Okay. When you heard Ms. McCarthy's
8 testimony, did you have any thoughts about how that
9 would affect REDACTED?

10 A Yes.

11 Q Please share that with Ms. Freeman.

12 A Yes, REDACTED is very anxious about her peers
13 seeing her deficits, and I think that being called on
14 25 times in 30 minutes would create a lot of anxiety.

15 Q Was that a concern you had expressed to
16 Ms. McCluskey and Ms. Houston previously?

17 A Yes.

18 Q Okay. Anything else that I failed to address
19 with you?

20 A I don't think so, no.

21 MR. RATNER: Okay. Ms. Freeman, that
22 completes my questioning. I appreciate the
23 opportunity.

24 And since this will probably be the last time
25 I talk to you, I would just like to say it's really

1 been an honor to represent you and Mr. REDACTED, so
2 thank you.

3 THE HEARING OFFICER: Thank you, Mrs. REDACTED n.
4 It's been a joy. And Mr. REDACTED.

5 Although, do we have any cross-examination?

6 MS. OWENS: Yes, ma'am.

7 THE HEARING OFFICER: Go ahead.

8 MR. ANDRIANO: Can we just take a short break?

9 THE HEARING OFFICER: Sure. Go ahead.

10

11 (Break taken.)

12

13 THE HEARING OFFICER: So we're back on the
14 record now with the testimony which will be the
15 cross-examination of REDACTED, who is the mother
16 of REDACTED.

17

18 REBUTTAL CROSS-EXAMINATION

19 BY MR. ANDRIANO:

20 Q Good morning, Mrs. REDACTED. I just have a few
21 follow-up questions for you in response to the
22 questions that you answered from Mr. Ratner.

23 If I could direct your attention to School
24 Board Exhibit Number 54, particularly the second page
25 of that document, which would be page 258.

1 A Okay.

2 Q Remember this letter you were referencing?

3 A Yes.

4 Q If you could just take a look at the first
5 sentence in the second paragraph, please.

6 A Uh-huh.

7 Q Doesn't it indicate that REDACTED's education
8 record is available for your inspection and review at
9 no charge to you?

10 A I'm sorry, the second paragraph?

11 Q Yes, ma'am, second paragraph, very first
12 sentence.

13 MR. RATNER: We'll stipulate to what the
14 letter says. That's not an issue.

15 MR. ANDRIANO: Okay. Is that okay,
16 Ms. Freeman?

17 THE HEARING OFFICER: Yes.

18 THE WITNESS: Because the third paragraph kind
19 of contradicts that statement.

20 THE HEARING OFFICER: This is School Board
21 Exhibit 54, both parties agree to stipulate that
22 this is in the record and to the statements that
23 were made in the email.

24 MR. RATNER: It's not in the email.

25 THE HEARING OFFICER: Where are you now?

1 MR. ANDRIANO: Second paragraph.

2 MR. RATNER: Page 258.

3 MR. ANDRIANO: First sentence.

4 THE HEARING OFFICER: Oh, 258. I thought you
5 said 57.

6 MR. ANDRIANO: I'm sorry, School Board 54.

7 MR. RATNER: You're in the right place.

8 There's an email that says, Please see attached
9 letter, and then we're talking about the letter,
10 which is 258.

11 THE HEARING OFFICER: I'm sorry. Okay. So
12 258.

13 MR. RATNER: We stipulate to the accuracy of
14 the sentence under the Family Education Rights and
15 Privacy Act: REDACTED's education record is available
16 for inspection and review at no charge to you.

17 I have a follow-up, which could also perhaps
18 be dealt with similarly, which is that at the first
19 sentence of the third paragraph says, Further, to
20 the extent you are requesting, quote, classwork
21 archived in Canvas for the 2020-2021 school year,
22 such records, if any, may not constitute an
23 education record. Then it goes on to say, Those
24 records would have to be requested pursuant to
25 FOIA.

1 Do you agree with that?

2 MR. ANDRIANO: Correct. As long as we're
3 agreeing to the exact wording of the letter, I have
4 no concerns.

5 MR. RATNER: Exactly. No characterizing.
6 Just her to take a look at it.

7 THE HEARING OFFICER: Okay. You both --

8 MR. ANDRIANO: That exhibit is already in
9 evidence.

10 THE HEARING OFFICER: You agree to the content
11 of the letter -- it's on Old Hundred Elementary
12 School stationary as Exhibit Number 258 -- page
13 number 258 out of Exhibit 54, and both parties want
14 me to look with particular deference to the
15 contents of this letter, specifically regarding the
16 FOIA and the FERPA -- all the information that's in
17 here.

18 MR. RATNER: Correct.

19 THE HEARING OFFICER: Right?

20 MR. ANDRIANO: Yes, ma'am.

21 THE HEARING OFFICER: Which both parties
22 stipulate is accurate.

23 MR. RATNER: Yes, ma'am.

24 THE HEARING OFFICER: Okay. Next.

25

1 BY MR. ANDRIANO:

2 Q Mrs. REDACTED, if you could take a look at
3 School Board 37, please.

4 MR. RATNER: I understand Mr. Andriano hasn't
5 asked a question yet, but this seems like it might
6 be beyond the scope because we definitely did not
7 talk about this document.

8 THE HEARING OFFICER: I'm so sorry to
9 interrupt you. What is the Exhibit Number?

10 MR. ANDRIANO: 37.

11 THE HEARING OFFICER: 37. Okay. I'm looking
12 at the IEP. And what is the question about it?

13 MR. ANDRIANO: I'm sorry, what was --

14 THE HEARING OFFICER: What was your question
15 about it?

16 MR. ANDRIANO: I haven't asked it. I was just
17 simply directing her.

18 BY MR. ANDRIANO:

19 Q Mrs. REDACTED, this is the IEP from February 19,
20 2021, correct?

21 A Correct.

22 Q And you were there?

23 A Yes.

24 Q REDACTED family attorney was there?

25 MS. RATNER: Objection. Beyond the scope.

1 MR. ANDRIANO: It's not beyond the scope.

2 Mr. Ratner specifically asked her about the
3 February 19, 2021, IEP.

4 MR. RATNER: Ms. Freeman, if you recall
5 yesterday --

6 THE HEARING OFFICER: Hold on. Let me --

7 MR. RATNER: I did ask about the meeting. I
8 agree with that.

9 MR. ANDRIANO: Then he opened the door, and
10 I'm entitled to walk through it.

11 MR. RATNER: I'm so sorry, if I could finish,
12 please.

13 We had a very clear colloquy on this yesterday
14 where Ms. Owens asked about MAPs testing, and then
15 there was a discussion about because she didn't ask
16 about a specific data point on the MAPs testing
17 that that question was beyond the scope. This has
18 to be applied consistently. Either it's beyond the
19 scope if you talk about it or it's not.

20 THE HEARING OFFICER: Again, commentary will
21 not be permitted and --

22 MS. RATNER: Well, we don't know how we can
23 make objections, and we need our objections to be
24 preserved.

25 THE HEARING OFFICER: Okay. That's fine. I

1 do remember that this morning that you asked
2 Mrs. REDACTED about the IEP.

3 MR. RATNER: That's inaccurate. I asked about
4 the meeting.

5 THE HEARING OFFICER: You asked about the
6 meeting that occurred at the 2/19 IEP meeting?

7 MR. RATNER: Right. That's different than
8 asking about an IEP.

9 THE HEARING OFFICER: Was your question to do
10 with the IEP meeting?

11 MR. ANDRIANO: Yes and no. He asked her about
12 this meeting because grades were discussed. I'm
13 simply going to follow up on the grade discussion
14 that, again, he opened the door to. If he didn't
15 want me to ask about this document, he shouldn't
16 have brought up.

17 THE HEARING OFFICER: I'm noting your
18 exception and moving forward. Ask the question.
19 Overruled.

20 BY MR. ANDRIANO:

21 Q Mrs. REDACTED, does it say REDACTED family attorney
22 was present at that meeting?

23 A It does.

24 Q And doesn't it indicate that a family
25 advocate was present at that meeting?

1 A It does.

2 Q Thank you. If you could please turn to page
3 162 of that document, and I'd like to direct your
4 attention to the very first paragraph, last two
5 sentences of that paragraph.

6 A Give me a minute. Can you give me my
7 glasses?

8 MR. RATNER: Again, Ms. Freeman, we will
9 stipulate to the documents saying what it says. If
10 Mr. Andriano wants to highlight to you sentences he
11 would like you to look at, I don't have any
12 problem.

13 MR. ANDRIANO: And that's fine with us,
14 Ms. Freeman. I just want to make it clear that the
15 increasing grades were discussed at the
16 February 19, 2021, IEP meeting and that Mrs. REDACTED
17 consented to this IEP.

18 THE HEARING OFFICER: Let me get that down.

19 MR. RATNER: I'm so sorry.

20 THE HEARING OFFICER: That's okay.

21 MR. RATNER: I will agree to both of those
22 points independently, yes, the grades were
23 discussed; yes, she subsequently consented to it.
24 I don't believe they are necessarily connected.
25 That will be an inference you will have to draw

1 yourself. Is that fair with you?

2 MR. ANDRIANO: It is except the increase in
3 the grades --

4 MR. RATNER: The increase in the grades.

5 MR. ANDRIANO: -- were discussed at the
6 February 19, 2021.

7 MR. RATNER: She said that already.

8 MS. RATNER: And I'm sorry --

9 THE HEARING OFFICER: This is the subject of
10 Mrs. **REDACTED** what she testified to just now, that
11 that was her concern were that the grades
12 increased.

13 MS. RATNER: She did not -- I have to correct
14 my husband on something. I'm sorry. She did not
15 consent to the accuracy of the IEP. She -- and you
16 can argue that makes no legal difference, which I'm
17 sure you will. But she signed the IEP subject to
18 express conditions and reservations of rights that
19 are memorialized in the exhibit.

20 MR. ANDRIANO: Nothing about grades.

21 MS. RATNER: She -- that is a fact -- whether
22 or not information in the IEP -- so let me ask you
23 this, Patrick, you're saying that a parent who
24 signs an IEP to get services for their child, that
25 necessarily is an admission that every factual

1 statement and every section of the IEP is accurate?

2 MR. ANDRIANO: My point is she was there with
3 her attorney, with her advocate. They were part of
4 the team that developed this document. If she had
5 concerns with the grades at this particular
6 meeting, I don't know why she would have signed
7 consent to it.

8 MS. RATNER: We have a tape recording that
9 shows her and her advocate and her attorney
10 expressing all of these concerns that has been
11 excluded. So the idea -- the idea and several of
12 your witnesses have testified to how long the
13 meeting it was. The idea that everything discussed
14 in the meeting is memorialized in writing in that
15 IEP is false.

16 MR. ANDRIANO: I understand your position.
17 And I am just making -- and I agree with
18 Mr. Ratner's stipulation. If we agree, it says
19 what it says, and it indicates that they were
20 present at the meeting.

21 THE WITNESS: I think the Hearing Officer
22 should just look at the signature page. If you
23 look at it, just so you know what we're talking
24 about.

25 THE HEARING OFFICER: Is there a note there?

1 THE WITNESS: Yes.

2 MR. ANDRIANO: It just say,s, with conditions.
3 It doesn't indicate anything about there was a
4 disagreement with the grades.

5 MR. RATNER: That's fine. Again, there's a
6 recording that hasn't been played, but you can draw
7 whatever conclusions you want.

8 THE HEARING OFFICER: I don't think we ever
9 got to the finality of the ruling on -- at least I
10 don't recall that there was finality on whether or
11 not that recording would be accepted.

12 MS. RATNER: We considered it final because we
13 were asked to provide it to them again, and we
14 object to that, because we have evidence that we
15 provided it timely, that it was downloaded by
16 Mr. Andriano --

17 THE HEARING OFFICER: Oh, I remember that
18 discussion.

19 MS. RATNER: But it was accepted -- the word
20 that it wasn't provided, we didn't see anything we
21 could do to change that, if it's not going to be
22 accepted that we have. I don't know. Maybe we'll
23 get an affidavit from the document company. So we
24 did not -- there was nothing in any of the
25 discussion or the ruling that we heard as an

1 ambiguity that we could continue arguing that
2 point.

3 THE HEARING OFFICER: So what's the last thing
4 you said?

5 MS. RATNER: We interpreted the decision as
6 final.

7 THE HEARING OFFICER: I thought we were in the
8 process -- if I recall correctly, there was a lot
9 of discussion about whether or not the recording
10 would be admitted, and I think at the conclusion,
11 if I remember correctly, but that was last week, I
12 believe at the conclusion of the discussion, School
13 counsel and Parents' counsel agreed to discuss
14 whether or not it would -- you would stipulate that
15 this was a recording of the meeting, and I don't
16 know if that was just never finalized because you
17 didn't agree?

18 MR. RATNER: We were never able to reach an
19 agreement.

20 MS. RATNER: We had no agreement reached.

21 THE HEARING OFFICER: That's where I was left
22 with it.

23 MS. RATNER: And they object to it on multiple
24 grounds, including the statement that they did not
25 receive it.

1 MR. ANDRIANO: Did the Hearing Officer receive
2 it?

3 THE HEARING OFFICER: I don't know.

4 MS. RATNER: The Hearing Officer did receive
5 it, and we can produce, as I offered to do last
6 week, documentation of it being produced, the
7 email.

8 THE HEARING OFFICER: If you sent it to me,
9 then I received it.

10 MS. RATNER: Right. Yes. Thank you very much
11 for saying that. I appreciate that.

12 THE HEARING OFFICER: Okay. I'm inclined to
13 take it and listen to it.

14 MS. RATNER: Thank you. Great.

15 THE HEARING OFFICER: So it's admitted.
16 However, if I interpret the meeting, when I listen
17 to it, to be stilted or maybe I get an idea that
18 information has been manipulated, then I'm going to
19 stop listening to it.

20 MR. ANDRIANO: That is our position, as you
21 know, Ms. Freeman, first of all, it was -- and I
22 believe Mr. Ratner even said this, it was not a
23 complete recording of the meeting.

24 THE HEARING OFFICER: Is that what you said?

25 MS. RATNER: The recording began a few minutes

1 into the meeting. However, there is nothing
2 altered -- for the portion of the meeting it is,
3 which is about ten minutes in until the conclusion
4 of the meeting.

5 THE HEARING OFFICER: It's just missing ten
6 minutes?

7 MS. RATNER: From the beginning.

8 MR. RATNER: I don't even know that it's that
9 long.

10 MS. RATNER: It may be five minutes. It may
11 be two minutes. I don't know. Maybe Mrs. REDACTED
12 knows. But the remainder of the recording has not
13 been altered, has not been stopped and started. It
14 is a genuine recording --

15 MR. ANDRIANO: How does she know?

16 MR. RATNER: Again, I find that a little bit
17 offensive because Mrs. REDACTED is under oath.

18 MR. ANDRIANO: You weren't there. How would
19 you know?

20 MR. RATNER: Mrs. REDACTED is under oath. And my
21 impression was when we had this discussion that if
22 the School Board had a full recording, there
23 wouldn't be any concerns about alterations.

24 MR. ANDRIANO: Right.

25 MR. RATNER: And how would we know?

1 MR. ANDRIANO: Because there was no recording.
2 The School Board didn't record that meeting.

3 MR. RATNER: If you did, we weren't allowed to
4 question the authenticity of it or whether it had
5 been manipulated.

6 THE HEARING OFFICER: Have you listened to it?

7 MR. ANDRIANO: No, we have not.

8 MR. RATNER: He downloaded it on March 4th.
9 If he's never listened to it, that's on him.

10 MR. ANDRIANO: But as we indicated --

11 THE HEARING OFFICER: But it was provided to
12 you is my problem.

13 MR. ANDRIANO: We assume so. I don't know.
14 But, again, it's not a business record. It was a
15 surreptitious recording.

16 THE HEARING OFFICER: You don't know that if
17 you haven't listened to it.

18 MR. ANDRIANO: How could it -- Ms. Freeman,
19 does the parent --

20 THE HEARING OFFICER: How do you know it's
21 surreptitious if you haven't listened to it?

22 MR. ANDRIANO: But we pointed you to the
23 letters that indicated that the School Board did
24 not record the meeting.

25 THE HEARING OFFICER: I remember that.

1 MR. ANDRIANO: And that in the future --

2 THE HEARING OFFICER: They need to request
3 permission.

4 MR. ANDRIANO: The attorney that was
5 representing them needs to notify the School
6 Division in advance. It's not a business record.
7 It's not a business record unless the School
8 Board --

9 THE HEARING OFFICER: Who took the recording?

10 MS. RATNER: The then attorney.

11 THE HEARING OFFICER: Mr. Mueller?

12 MS. RATNER: Correct.

13 MR. RATNER: Correct. Mrs. REDACTED was present.

14 MS. RATNER: And there's a dispute as to
15 whether the -- we know the School District says
16 they weren't informed. Mrs. REDACTED says they were.
17 As we said before, with the VAC, the remedy for not
18 telling in advance that you're recording a
19 meeting -- again, I'm not conceding she didn't
20 tell. She did. But hypothetically if she did not,
21 the remedy for that is to provide a recording. The
22 recording was provided after the fact. Every bit
23 of the recording that exists was provided in its
24 completeness. In fact, it goes on at the end,
25 Mr. Mueller is on a phone call with some other

1 person and forgot to turn off the recording, and we
2 left it in there to make sure there was no -- so he
3 started it -- I think he was a few minutes late to
4 the meeting, started it a few minutes late, but I
5 stayed in my place as an officer of the court,
6 member of the bar, that recording has not altered.
7 It has not been -- or anything removed from it.
8 Every bit of it that exists was provided. And
9 Mr. Andriano downloaded it on March 4, 2022.

10 THE HEARING OFFICER: How do you know he
11 downloaded it?

12 MR. RATNER: We showed you.

13 THE HEARING OFFICER: Oh, you did.

14 MR. RATNER: I sent the link to you. I sent
15 it to him, and it shows that he downloaded it. I
16 showed it to you, and I would be happy to show you
17 again.

18 THE HEARING OFFICER: I'm going to accept it
19 over your objection. I'm going to note your
20 exception to the ruling, but I'm going to accept it
21 and listen to it. And the reason for that is I
22 understand that surreptitious recordings and they
23 can be altered and all that sort of thing, but
24 Ms. Ratner did point out one important point that I
25 completely neglected to consider, which was that it

1 was taken by -- she says, and I believe her, that
2 it was taken by -- the record was taken -- the
3 audio recording was taken by Mr. Mueller, who is an
4 attorney -- is he presently a member of the
5 Virginia State Bar?

6 MR. RATNER: He is.

7 THE HEARING OFFICER: He's not here to testify
8 about the authenticity but rules are relaxed.

9 MR. ANDRIANO: Ms. Freeman --

10 THE HEARING OFFICER: I am just going to
11 listen to it, and I will say, I've listened to
12 recordings by advocates because, as you know, the
13 advocates take recordings of IEP meetings, of all
14 sorts of meetings, and I don't know exactly what
15 they say when they go in to record, but I would
16 imagine that the school system always records for
17 the reason that we're arguing about right now,
18 authenticity. But if your representation to me,
19 Ms. Ratner, is that the recording was taken by a
20 Virginia attorney, then I will take it.

21 MS. RATNER: Thank you. That is my
22 representation.

23 THE HEARING OFFICER: As an officer of the
24 court.

25 MR. ANDRIANO: Ms. Freeman, one last point --

1 THE HEARING OFFICER: Hold on. Just a minute.
2 Another thought just occurred.

3 When I listen to this -- and I believe you-all
4 said that it was about three hours long, but I'll
5 listen to the whole thing -- the whole recording.
6 I don't want to refer to it as a thing. But the
7 whole audio recording, if when I'm listening to it,
8 however, it's evident that I can't hear people;
9 that there's so much confusion that there's no
10 point in listening to it, that people are speaking
11 over each other, which happens quite a bit at --

12 MS. RATNER: That was actually a very
13 civilized and polite meeting, so I don't think --
14 but I understand what you're saying.

15 THE HEARING OFFICER: All right. Thank you.

16 MR. ANDRIANO: Just one last point on it
17 again, I'm not questioning Ms. Ratner's veracity.
18 What I'm saying is she's -- she has a recording
19 from a third party.

20 THE HEARING OFFICER: I know it's unusual. I
21 know. And I'm going to note your exception. But
22 I'm going to listen to the recording unless when I
23 get into it, it appears that I shouldn't be
24 listening to it.

25 MR. ANDRIANO: Understood. Thank you for your

1 consideration.

2 THE HEARING OFFICER: All right. So are we --
3 so we've addressed then the audio recording, which
4 is accepted with limitations.

5 MR. RATNER: So that's Exhibits 33,
6 Parents' 33.

7 THE HEARING OFFICER: Parents' 33. All right.

8

9 (Parents' Exhibit No. 33 admitted.)

10

11 THE HEARING OFFICER: Where are we?

12 MR. ANDRIANO: I have just one or two more
13 questions, and then we can let Mrs. REDACTED go.

14 THE HEARING OFFICER: All right.

15 BY MR. ANDRIANO:

16 Q Mrs. REDACTED, could you turn to School
17 Board 53?

18 MR. RATNER: Mr. Andriano, 53?

19 MR. ANDRIANO: Yes.

20 THE HEARING OFFICER: 53 of?

21 MR. ANDRIANO: School Board 53.

22 BY MR. ANDRIANO:

23 Q This is REDACTED's fifth grade report card,
24 correct, Mrs. REDACTED?

25 A Correct.

1 Q And you and Mr. REDACTED received this document?

2 A Correct.

3 Q If you could please turn to the second page,
4 which is Bates 256.

5 Do you see that page, ma'am?

6 A Yes.

7 Q If you look down in the bottom right-hand
8 corner, do you see the statement Parent-teacher
9 conference requested?

10 A Yes.

11 Q And that box is not checked, is it?

12 A This isn't the one I received. This is the
13 end of the year. So, no, on the end-of-the-year one,
14 it is not. You know, without seeing the first quarter
15 report card, second quarter record card or third
16 quarter report card, I cannot say whether or not I
17 checked it.

18 Q I understand, ma'am. But this document right
19 here, the box is not checked for a parent-teacher --

20 A Is this the one that --

21 MR. RATNER: We will stipulate.

22 MS. RATNER: We will stipulate to it.

23 MR. ANDRIANO: All right. Great. Thank you.

24 THE HEARING OFFICER: Okay.

25 MR. ANDRIANO: Thank you, Mrs. REDACTED.

1 THE HEARING OFFICER: Thank you. Do we have
2 any more questions?

3 MR. RATNER: One second, please.

4 No, we don't have any more. Thank you.

5 THE HEARING OFFICER: All right. We may have
6 some motions. Do you want to take those up now
7 while we're still on the record? As far as -- I've
8 allowed Mrs. REDACTED to make her -- finish her
9 testimony, and you may be dismissed. You can go
10 back to your seat, and thank you very much.

11 So now we're going to do motions. We'll do
12 them on the record or not?

13 MR. ANDRIANO: The School Board doesn't have
14 any motions.

15 THE HEARING OFFICER: Do you have any motions?

16 MR. RATNER: We do. The Parents would like to
17 move into evidence all of the exhibits that were
18 provided in advance, so that is Volumes 1 through
19 4, Exhibits 1 through 125, and then we had a few
20 additional ones today that have already been --

21 THE HEARING OFFICER: Which I've handed over
22 to the court reporter --

23 THE COURT REPORTER: I don't have those
24 exhibits.

25 THE HEARING OFFICER: Actually, I took those

1 back.

2 MR. RATNER: So the one point of clarification
3 is with respect to Exhibit 125. Although --

4 THE HEARING OFFICER: Is that yours?

5 MR. RATNER: It is Parents' 125. It is on our
6 list. It is in the electronic version of the
7 documents. I believe it is in Mr. Andriano's book.
8 I kept it out because I was going to hand it up
9 when we actually discussed it. It is a comparison
10 of the two service logs that we've asked you to
11 note, and so I want to make sure we are offering
12 this as well. I'll show it to Mr. Andriano first.

13 THE HEARING OFFICER: Go ahead.

14 MR. RATNER: This was 125.

15 MR. ANDRIANO: I do remember that.

16 MR. RATNER: So we would like all --

17 THE HEARING OFFICER: Is there any objection?

18 MR. ANDRIANO: Yes, ma'am. Again, the ruling
19 in this case, and this was discussed at the
20 prehearing conference, the very last one, that
21 exhibits were to be introduced individually. The
22 School Board had lots of objections to the Parents'
23 exhibits. This is rebuttal. This is not the
24 Parents' case in chief. So any exhibits that were
25 to be introduced should have been introduced with

1 the witness who was on the witness stand to lay the
2 proper foundation and hear objections.

3 THE HEARING OFFICER: Okay. So this --

4 MR. RATNER: Let me make just one brief
5 comment, and then I will let you rule.

6 THE HEARING OFFICER: Okay. Go ahead.

7 MR. RATNER: So I agree with most of what
8 Mr. Andriano said, but you will recall specifically
9 before we rested, I said, I have additional
10 documents I'd like to get in; we can do it today
11 or -- I just don't want them to make a motion to
12 dismiss. So I disagree with his point about this
13 is rebuttal and the wrong time. We don't need to
14 argue it anymore. We are offering all these. You
15 certainly can reject them, but we are offering them
16 all into evidence. I don't think we need any more
17 discussion on it.

18 THE HEARING OFFICER: Let me read it. So you
19 object to this document being admitted?

20 MR. ANDRIANO: Yes, ma'am. There's been no
21 foundation for that document.

22 MS. OWENS: Or who created it.

23 MR. RATNER: It's really -- that particular
24 one is really just for your benefit as you a
25 compare the logs. You can decide for yourself if

1 it's accurate or not. But to be clear, that's not
2 the only document we're offering. We are offering
3 every single exhibit.

4 THE HEARING OFFICER: Any objection to -- let
5 me go over this one. As counsel has stated,
6 there's been no foundation for this document.

7 MR. RATNER: I'm sorry, what was that?

8 THE HEARING OFFICER: This service log was
9 provided by a Mr. Gonzalez, who is the assistant
10 principal. That's what it says.

11 MR. RATNER: It was handed -- one of the
12 service logs was handed to Mrs. REDACTED by
13 Mr. Gonzalez. That was the testimony. No one is
14 saying he prepared it. But in any event, just to
15 fully identify it for the record, it is a document
16 identified as Parents' Exhibit 125, and the Bates
17 numbers are Parents' 002378 through 2388.

18 THE HEARING OFFICER: I have no idea where
19 this document came from. I don't know what it is
20 supposed to tell me. There's been no foundation.

21 MR. RATNER: Well, there has been.

22 THE HEARING OFFICER: I'm going to reject it.

23
24 (Parents' Exhibit No. 125 offered and
25 rejected.)

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MR. RATNER: That's fine. I don't want it back. I think it's supposed to be part of the administrative record.

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THE HEARING OFFICER: Is there any objection to him introducing -- or the Parents introducing all of these documents? And the basis is that these documents -- all of these documents were not necessarily addressed during the hearing?

10

MR. ANDRIANO: They absolutely were not.

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THE HEARING OFFICER: So what I'm going to do is accept all the documents that were introduced, according to the court reporter. She's the one who keeps the record of all of that. She's going to give me a list of all those documents, and that's what is admitted.

17

18

However, I'll take all your books with me so I can pull the documents out.

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(Parents' Exhibits Volumes 1 through 4, Exhibit Nos. 1 through 124 offered and rejected, except for Parent Exhibits individually admitted.)

25

MS. RATNER: And the ones rejected, our

1 understanding is they are still part of the record.

2 THE HEARING OFFICER: They are.

3 MS. RATNER: They are not admitted, but they
4 are still in the record.

5 THE HEARING OFFICER: Yeah. Anything that's
6 rejected just generally, she keeps, "she" meaning
7 the court reporter, keeps a record of it and she
8 will have a list of the items that were admitted
9 and then items that were rejected.

10 MR. RATNER: If I could just clarify on
11 that --

12 THE HEARING OFFICER: The other things I did
13 accept today, I think there was a couple of emails.

14 MR. RATNER: There were. But I think there
15 was one you rejected and gave back to me.

16 MR. ANDRIANO: That's the November 6, 2019.

17 MR. RATNER: Just for clarity, it's a two-page
18 document REDACTED 496 and 497.

19 THE HEARING OFFICER: Are there any more
20 motions?

21 MR. ANDRIANO: Nothing from the School Board.

22 THE HEARING OFFICER: Any motions from you?

23 MR. RATNER: Just one moment. I don't think
24 so.

25 THE HEARING OFFICER: Just so you know, I'm

1 going to get my technology assistant to pull up the
2 three-hour approximately recording, and I'll listen
3 to it.

4 MR. RATNER: Yes. And if you have any
5 difficulty with that, please let me know.

6 THE HEARING OFFICER: I will.

7 MR. RATNER: Because we have --

8 THE HEARING OFFICER: I shouldn't if she pulls
9 it up.

10 MR. RATNER: What deadline would you like us
11 to provide --

12 THE HEARING OFFICER: Let's go over that.
13 Thank you for bringing that up.

14 So I think I mentioned in the prehearing
15 report how long the closing document is to be; that
16 there's supposed to be double spacing in it and
17 including footnotes; if I recall correctly, it
18 can't be any longer than 20 pages.

19 MR. RATNER: That's consistent with my
20 recollection, but I will defer to the order.

21 THE HEARING OFFICER: What it says in the
22 prehearing report is the way it's supposed to be.

23 MR. RATNER: Yes, ma'am.

24 THE HEARING OFFICER: And did you have any
25 questions about that?

1 MR. ANDRIANO: We do not.

2 THE HEARING OFFICER: And the index for all
3 the cases and the cases will be in there?

4 MR. RATNER: That's right. So the question is
5 when would you like it?

6 THE HEARING OFFICER: Let's see. Let me pull
7 my calendar out.

8 MS. OWENS: Yesterday you indicated a weak
9 before your decision was due.

10 THE HEARING OFFICER: Yeah, it just has to be
11 to me before my decision is due. I'm thinking
12 about a week before.

13 MS. RATNER: It can't be like the day.

14 THE HEARING OFFICER: We've already had the
15 discussion, unless you want me to go over it again,
16 about when the transcripts are going to be
17 provided.

18 MR. RATNER: We've got that, yes.

19 THE HEARING OFFICER: We do. Okay.

20 MS. OWENS: Your decision is due on
21 April 16th.

22 THE HEARING OFFICER: That's what my
23 recollection is, but I'm going to recount the days
24 because sometimes I will do the day after instead
25 of the day of and -- I always go over it again, but

1 I think it's the 16th of April.

2 MS. OWENS: Yes, ma'am. So if it's due a week
3 before, would that mean it's due the 9th of April?
4 That's a Saturday. Both are Saturdays.

5 THE HEARING OFFICER: Oh, no, we don't have
6 anything due on Saturday. So I'll give you to the
7 following Monday, if that's all right.

8 MR. RATNER: Or maybe the previous Friday so
9 you have more time with the briefs?

10 THE HEARING OFFICER: What do you-all prefer?
11 Do you want Monday or Friday?

12 MS. OWENS: Since, you know, since the School
13 Board is the respondent in the case, if the Parents
14 could provide their response -- their closing brief
15 by the 8th and the --

16 MS. RATNER: No, we object to that. That was
17 decided. They are going to be simultaneous.

18 THE HEARING OFFICER: We are going to do it
19 simultaneously. I think that makes it easier, and
20 it actually gives you a lot less work, I think.
21 All sides have done so much work on this case.

22 MS. OWENS: So the 11th then, Ms. Freeman, is
23 what I'm hearing? That's the Monday.

24 THE HEARING OFFICER: That sounds good.
25 Is that okay with you?

1 MR. RATNER: Fine with us.

2 MS. RATNER: By 5 p.m. or by end of the day,
3 11:55?

4 THE HEARING OFFICER: End of the day. That
5 last second sometimes is so important.

6 MR. RATNER: Just to clarify --

7 THE HEARING OFFICER: When closings are due?

8 MR. RATNER: Yes.

9 THE HEARING OFFICER: The 11th. And
10 everyone -- that's acceptable to both sides, right?

11 MR. RATNER: Yes, ma'am. If we have a lot of
12 case law, which I expect we will, it will probably
13 be too big to email directly and we will have to
14 send a link like we did with our exhibits.

15 MR. ANDRIANO: I thought she just wanted an
16 index of cases.

17 THE HEARING OFFICER: I just wanted an index.

18 MR. RATNER: Oh, you --

19 MS. RATNER: I thought you --

20 THE HEARING OFFICER: And the actual cases.

21 MR. ANDRIANO: Oh, you want the actual case?
22 I'm sorry. I thought you just wanted an index of
23 cases.

24 THE HEARING OFFICER: I don't want to spend my
25 whole time looking --

1 MR. ANDRIANO: Right. So you want an index
2 plus the actual cases.

3 THE HEARING OFFICER: If that's no problem.

4 MR. ANDRIANO: No, ma'am.

5 MR. RATNER: It may have just have to be a
6 link to download instead of a direct email. If you
7 have trouble downloading it, just let us know.

8 THE HEARING OFFICER: Is everybody comfortable
9 just giving me a link where I can connect to the
10 case? Is that better for everybody? Is that
11 easier?

12 MR. RATNER: It just depends on how big of a
13 document it turns out when we're done. There's a
14 limit on --

15 THE HEARING OFFICER: Let me give you the
16 ability to do both. How about that?

17 MR. RATNER: Sure. That's great.

18 THE HEARING OFFICER: That doesn't mean that
19 you have to do both. It means you can do one or
20 the other.

21 MR. ANDRIANO: One being the link.

22 MR. RATNER: Either email it directly --

23 THE HEARING OFFICER: If I can press a button
24 and it just comes up for me, it's so much easier
25 than my having to figure out where it is and get

1 ahold of the case. That takes up a lot of time.

2 MR. RATNER: And the issue is simply there's a
3 technological -- if it's bigger than 25 megabytes,
4 not to get into too much detail, the email won't go
5 through. So it just depends how big it is.

6 THE HEARING OFFICER: I will have to consult
7 my technology assistant on a megabyte.

8 MR. RATNER: That's all I'm saying, Patrick.
9 Electronic delivery either as an attachment to an
10 email or a link.

11 MR. ANDRIANO: Got it.

12 THE HEARING OFFICER: That's fine. Either way
13 is fine.

14 MR. ANDRIANO: And Ms. Freeman, just for
15 clarity, that's due on the same date as the closing
16 brief, right?

17 MR. RATNER: It is the closing brief.

18 THE HEARING OFFICER: I would say so, yeah.

19 MR. RATNER: We're considering it all one in
20 the same, and it will be prior to midnight.

21 THE HEARING OFFICER: We could get the closing
22 in on Friday, the written in that Friday that
23 precedes -- what was that? The 8th, I believe.
24 And then get the case links maybe on Monday. If
25 that would make it easier for you, we could do

1 that.

2 MR. RATNER: No difference to us.

3 THE HEARING OFFICER: It doesn't make a
4 difference to you.

5 Would that be easier for you?

6 MS. RATNER: I mean, the cases are going to be
7 cited in the brief, so I was just thinking of that
8 as all at the same time.

9 THE HEARING OFFICER: Well, it might be easier
10 to some to do that.

11 MR. ANDRIANO: I would rather just do it all
12 on the 11th, if that's okay.

13 THE HEARING OFFICER: Okay. All on the 11th
14 is fine. You can make your own time arrangements
15 about submitting.

16 MR. RATNER: Yes, ma'am.

17 THE HEARING OFFICER: And if you submit
18 earlier, that's wonderful.

19 Okay. Now, as far as I know, the written
20 decision will be done on or before the 16th. Then
21 that's the end of the case. And then if there is
22 an appeal, the appeal rights will be noted at the
23 end of the decision about where to appeal, what to
24 do, all that kind of thing.

25 Unless there are any more motions -- thank you

1 to the observers for being respectful and being
2 quiet, and I appreciate it. Thank you so much.
3 All right. Are there any more motions? Anything
4 else to do?

5 MR. ANDRIANO: Nothing from the School Board.

6 THE HEARING OFFICER: Thank you to everyone
7 for being as respectful as possible.

8 MR. ANDRIANO: Thank you, Ms. Freeman, for
9 your service.

10 MS. OWENS: Thank you, Ms. Freeman.

11 THE HEARING OFFICER: Thank you.

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13 (Hearing concluded at 10:47 a.m.)

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1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Lori A. Boeding, CCR, Notary Public in and for
3 the Commonwealth of Virginia at Large, and whose
4 commission expires August 31, 2024, do certify that I
5 was the court reporter at the aforementioned
6 proceedings and that the foregoing is a true, correct,
7 and full transcript to the best of my knowledge and
8 ability of the proceedings herein.

9 I further certify that I am neither related to
10 nor associated with any counsel or party to this
11 proceeding, nor otherwise interested in the event
12 thereof.

13 Given under my hand and notarial seal at
14 Richmond, Virginia, this 8th day of April, 2022.

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Lori A. Boeding, CCR
Notary Registration No. 239861
Commonwealth of Virginia at Large

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