

**To:** Wesley Allen  
**Cc:** Schaefer, Dawn M; Stack, Ellie P.  
**Subject:** RE: FCPS [REDACTED] Expert re: Lindamood-Bell  
**Date:** Thursday, September 10, 2020 1:01:22 AM

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Hi Wes,

I am available during the dates mentioned below. I am available at the following times next week:

Monday: 10:30-1 00

Tuesday: 9:30-11:30, then at 2:30

Wednesday:

Jugnu Agrawal, Ph.D.  
Educational Specialist, Adapted Curriculum  
Office of Special Education Instruction K-12  
Fairfax County Public Schools  
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**From:** Wesley Allen [mailto:wallen@bklawva.com]  
**Sent:** Wednesday, September 9, 2020 12:59 PM  
**To:** Agrawal, Jugnu P. <JPAgrawal@fcps.edu>  
**Cc:** Schaefer, Dawn M <DMSchaefer@fcps.edu>; Stack, Ellie P. <EPStack@fcps.edu>; Wesley Allen <wallen@bklawva.com>  
**Subject:** FCPS [REDACTED] Expert re: Lindamood-Bell

Good afternoon, Jugnu:

It's been awhile, but it looks like we will require your knowledge and familiarity with Lindamood-Bell once more as an anticipated witness in a case that has been scheduled for a Due Process Hearing Sept. 29-Oct. 1. As a threshold matter, could you confirm your availability on those days and place a hold on your calendar on those?

I've copied/pasted the DPH Complaint below (it was submitted in the form of an email) and attached our responsive pleading to provide you a background. The crux of Parent's case is over the appropriateness of the Just Words reading methodology that was suggested as a potential method of curricular program for the Student.

In short, this case involves [REDACTED]

Parent's Complaint specifically alleges that Just Words is inappropriate for students with dyslexia. She cites an article from Wilson's *Decoder* newsletter (copied/pasted below), which she appears to have taken out of context, and she cites a recent DPH ruling (attached) wherein the hearing officer found that Just Words was an inappropriate reading methodology for the student there (who was far more impacted by his dyslexia). We disagree with the hearing officer's comments about Just Words in that case. You should know that that case was an FCPS case where Dottie did her level best to convince the hearing officer that Just Words was intensive enough for students with dyslexia, but, nonetheless, she could not. To that end, and, as an initial inquiry, are you aware of any Wilson literature that supports that position?

All this is to say that we need witnesses to testify about the Student's need for additional reading instruction and the appropriateness of the methodologies that have been (and continue to be) offered to him. While some of the folks who've been involved in the IEP process can respond to part of that, it is necessary that we have a witness who can directly address the article about Just Words (below), and explain that Just Words is indeed one appropriate curricular program for a student, such as this Student, who has a mild-to-moderate level of dyslexia. Is this something you might be able to address?

Moreover, we need a witness to testify that Lindamood-Bell is not necessary or perhaps even appropriate for this Student's reading needs. We understand you have been tapped to serve in that capacity.

It would likely be helpful to schedule a time to additionally initially discuss this case in the near future to ensure we can get you all the relevant file material in plenty of time before the Hearing. To that end, do you have any availability early next week?

We look forward to having you on board for this case. Please let me know if you have any initial questions.

Best,  
Wes

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