

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, Colorado 80202</p>	<p><input type="checkbox"/> COURT USE ONLY <input type="checkbox"/></p>
<p>PLAINTIFFS: Anthony Lobato, et al.</p> <p>and</p> <p>PLAINTIFFS-INTERVENORS: Armandina Ortega, et al.</p> <p>vs.</p> <p>DEFENDANTS: The State of Colorado, et al.</p>	
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<p align="center">DEFENDANTS' SECOND SET OF INTERROGATORIES TO SCHOOL DISTRICT PLAINTIFFS</p>	

Defendants, by their counsel, propound the following Second Set of Interrogatories to be answered by School District Plaintiffs within 30 days of service.

DEFINITIONS AND INSTRUCTIONS

- A. The term “all” includes the term “any” and vice-versa.
- B. The term “and” includes the term “or” and vice-versa.
- C. The term “identify” when used in reference to a fact, means to state all known facts within your knowledge, care, custody of control or that should be available to you based upon reasonable inquiry.
- D. The terms “you,” “your” or “District” refer to each School District Plaintiff responding to these requests for production, as well as any employee, agent, attorney, or other representative acting for the School District Plaintiff.

INTERROGATORIES

38. For each year from 2005 to the present, identify the number of teachers dismissed or non-renewed. As used in this interrogatory, dismissal or non-renewal does not include teachers who voluntarily resigned their positions or voluntarily retired, but does include teachers who resigned or retired after being informed by the District that they would be dismissed or non-renewed. Plaintiffs need not disclose specific identities of any teacher or teachers in responding to this interrogatory.

39. For each year from 2005 to the present, identify the number of teachers who were dismissed or non-renewed for being “ineffective.” As used in this interrogatory, “ineffective” means dismissal or non-renewal for reasons relating to a teacher’s performance in the classroom or for failing to meet the district’s standards or expectations in the classroom. “Ineffective” does not mean termination for any violations of state law.

40. Identify the cost to a District taxpayer of one mill per \$100,000 of assessed residential property value.

41. Identify the aggregate dollar amount that is generated for the District for every one mill levied.

DATED: April 20, 2011

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s/ Nicholas Heinke

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*Original signature of Nicholas Heinke is on file at the
Office of the Colorado Attorney General*

CERTIFICATE OF SERVICE

This is to certify that I have duly served the within **DEFENDANTS' SECOND SET OF INTERROGATORIES TO SCHOOL DISTRICT PLAINTIFFS** upon all parties herein via electronic mail, Lexis/Nexis File & Serve, and/or U.S. Mail this 20th day of April, 2011:

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