



Sep 20 2010
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DISTRICT COURT, DENVER COUNTY, COLORADO

Denver City and County Building
1437 Bannock St.
Denver, Colorado 80202

Plaintiffs: ANTHONY LOBATO, et al.

and

Plaintiff-Intervenors: ARMANDINA ORTEGA, et al.

v.

Defendants: THE STATE OF COLORADO, et al.

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ALEXANDER HALPERN LLC
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Jennifer Weiser Bezosa, #40662
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District No. 28*

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Case No. 2005CV4794

Div. 9

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Attorneys for Plaintiffs Creede Consol. School District No. 1, Del Norte Consol. School District No. C-7, Moffat School District No. 2, and Mountain Valley School District No. RE 1

PLAINTIFFS' COMBINED INITIAL DISCLOSURES BY CERTAIN PLAINTIFFS AND FIRST SUPPLEMENTAL DISCLOSURES

Pursuant to Colorado Rules of Civil Procedure 26(a)(1) and 26(e), Plaintiffs Anthony Lobato, et al. ("Plaintiffs") hereby submit the following initial disclosures by Aurora, Joint School District No. 28, Moffat County School District Re: No. 1, Montezuma-Cortez School District RE-1, and Pueblo, School District No. 60 (collectively the "New Plaintiffs") and the following supplemental disclosures by all Plaintiffs.

The New Plaintiffs were each added as a plaintiff in this action on August 5, 2010. The New Plaintiffs hereby adopt each and every disclosure listed in the Plaintiffs' Initial Disclosures dated July 1, 2010 as if set forth fully herein. The additional disclosures set for the below, whether initial or supplemental to a particular plaintiff, are made by and on behalf of all Plaintiffs. The disclosures are made based upon information currently known and reasonably available to Plaintiffs at this time. Plaintiffs' disclosures represent a good faith effort to identify individuals they now reasonably believe may have discoverable information. However,

Plaintiffs reserve the right to supplement these disclosures as discovery and investigation proceed in this action.

A. Individuals Likely to Have Discoverable Information

The following individuals are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings. By making this disclosure, Plaintiffs do not waive any objection to the relevance of testimony of any of the following persons or any other appropriate objections, including, among others, the attorney-client privilege or work product doctrine:

II. School District Officials: The following individuals are officials and/or representatives of the Plaintiff School Districts. Each individual is likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, including, without limitation, information relevant to their respective school district and school financial operations and budgets, educational programs, strategic planning, accreditation, teacher evaluation and performance, and student assessment and performance. Each individual is also likely to have relevant information concerning programs and resources necessary to provide the educational services mandated by the constitution, statute, and regulation; the impact of under-funding on the quality of education that the district is able to provide those programs and otherwise to meet mandated standards of educational quality for all students; the gap between the resources necessary to meet educational mandates and the funding actually provided by the public school finance system; and the effect on educational quality of the lack of funding.

Aurora, Joint School District No. 28

John L. Berry, Superintendent
Tony Van Gytenbeek, Deputy Superintendent.
William Stuart, Chief Academic Officer
Lisa Escarcega, Chief Accountability & Research Officer
Casey Wardynski, Chief Financial Officer
15071 E. 1st Ave.
Aurora, CO 80011
303-344-8060

Moffat County School District Re: No. 1

Joe Petrone, Superintendent
Dr. Christine Villard, Assistant Superintendent
775 Yampa Avenue
Craig, CO 81625
970-924-3268

Montezuma-Cortez School District RE-1

Stacy Houser, Superintendent
Lori Haukeness, Chief Academic Officer
Melissa Brunner, Chief Financial Officer
400 N. Elm. Street
Cortez, CO 81321
970-565-7522

Pueblo, School District No. 60

Dr. Margarita Lopez, Superintendent
Rebecca Kluck, Chief Financial Officer for Business & Fiscal Affairs
Robert Vise, Executive Director of Assessment
Marcie Bartely, Director of Magnet Schools
315 W. 11th Street
Pueblo, CO 81003
719-549-7100

Centennial R-1

Beverly Maestas, Superintendent (new Superintendent)
Nicole Newman, K-12 Principal
Howard Tucker, Financial Consultant
P.O. Box 350
San Luis, CO 81152
Phone: 719-672-3240

Del Norte C-7

Mike Salvato, Superintendent

P.O. Box 159

Del Norte, CO 81132

Phone: 719-657-4303 ext. 4001 (corrected phone number)

Sangre de Cristo RE-22J

Brady Stagner, Superintendent (new Superintendent)

P.O. Box 145

Mosca, CO 81146

Phone: 719-378-2321

Dated: September 20, 2010

DAVIS GRAHAM & STUBBS LLP

/s/ Terry R. Miller

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The original, executed document is on file at the offices of Davis Graham & Stubbs LLP.

CERTIFICATE OF SERVICE

The undersigned certifies that on the 20th day of September, 2010, a true and correct copy of the foregoing **PLAINTIFFS' COMBINED INITIAL DISCLOSURES BY CERTAIN PLAINTIFFS AND FIRST SUPPLEMENTAL DISCLOSURES** was served via LexisNexis® File & Serve, addressed to the following:

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Denver, CO 80211

/s/ Bernadette Marquez _____
Bernadette Marquez

The original, executed document is on file at the offices of Davis Graham & Stubbs LLP.