

VIRGINIA:

IN THE CIRCUIT COURT OF LOUDOUN COUNTY

CLINT THOMAS, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Case No. 22003556-00
	)	
THE LOUDOUN COUNTY	)	
PUBLIC SCHOOLS, et al.,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO  
DEFENDANT BRENDA SHERIDAN**

Plaintiffs request, pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia, that Defendant Brenda Sheridan answer the following Interrogatories within twenty-one (21) days of service to the office of the Binnall Law Group, PLLC, 717 King Street, Suite 200, Alexandria, Virginia 22314.

**DEFINITIONS**

1. The term "Defendant(s)" means any defendant unless specifically named.
2. The term "document(s)" means all written, printed, record or graphic matter, photographic matter, sound reproductions, or other retrievable data (whether recorded, taped, or coded electrostatically, electromagnetically, or otherwise) including the original and any non-identical copy and every draft of all correspondence, memoranda, notes of meetings, facsimiles, electronic mail ("e-mail"), voicemail, text messages, reports, transcripts or notes of telephone conversations, diaries, notebooks, minutes, notes, tests, reports, analyses, studies, maps, charts,

diagrams, spread sheets, balance sheets, income statements, statements of cash flow, and any other writings or documentary material of any nature whatsoever, together with all attachments thereto and enclosures therein.

3. The term “communicate(d)” shall mean the interchange of thoughts, opinions, or information whether orally, electronically, or in writing, including, without limitation, text messages, messages sent via messaging applications (e.g., WhatsApp, Signal, etc.), e-mails, and social media posts of any kind.

4. The term “Complaint” shall mean Plaintiffs’ Complaint filed on June 29, 2022, against Defendants.

### **INTERROGATORIES**

1. State the name, address, telephone number, job title, and e-mail address for each person likely to have discoverable information, along with the subjects of that information, that Defendant Brenda Sheridan may use to support her claims and/or defenses.

2. Identify all documents used to train staff on the implementation of Loudoun County Public Schools (“LCPS”) Policy 8040 and Regulation 8040.

3. State the name, address, telephone number, job title, and e-mail address for each person that participated in the drafting and editing of LCPS Policy 8040, Regulation 8040, and staff trainings on the implementation of and compliance with Policy and Regulation 8040.

4. State the name, address, telephone number, company name, and e-mail address for each person/organization and consulting company since January 2, 2019,

to present that has been paid by LCPS to provide consulting services with respect to any of the following: Policy 8040 and/or Regulation 8040; LCPS's Culturally Responsive Framework; LCPS's Action Plan to End Systemic Racism; LCPS's Comprehensive Equity Plan; Social and Emotional Learning; and the Diverse Classroom Libraries.

5. Identify all evidence-based research relied upon in support of Policy and Regulation 8040.

6. Identify all model policies or best practices relied upon in support of Policy and Regulation 8040.

7. Describe the process by which LCPS developed the position that it is acceptable to withhold information about a student from that student's parents, as described on page 6 of Exhibit C to the Complaint.

8. Identify all stakeholders on whose input LCPS relied in formulating Policy and Regulation 8040.

9. Describe all protections for parental notification contained in Policy and Regulation 8040.

10. Identify all outside contractors and/or consulting companies that LCPS has paid to help it implement Policy and Regulation 8040, to include any physical changes to school infrastructure (new bathrooms, construction edits, etc.) and any teacher training or other implementation materials. Include the company name, address, and the name, email address, and phone number of any individual with whom you have

corresponded at each firm, and the amount of money LCPS has paid each firm since January 1, 2021.

11. Identify every organization, including the name, telephone number, and e-mail address for each person with whom you have communicated in that organization, since January 2, 2019, to the present, that LCPS has paid to provide consulting services and/or teacher trainings regarding Diverse Classroom Libraries.

12. Identify each email address you have used while working on behalf of LCPS.

13. Identify any state legislators or administrative officials with whom you communicated with regarding Policy and Regulation 8040.

14. Identify any attorney you consulted regarding the legality of Policy and Regulation 8040.

15. Identify any persons or entities who lobbied LCPS in support of Policy and Regulation 8040.

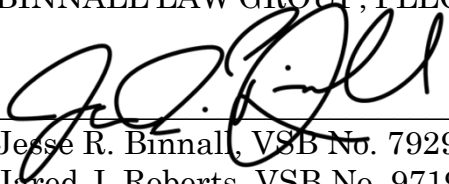
16. Identify all alleged sexual assaults occurring in any LCPS bathroom during the 2021-2022 school year, as well as your response.

17. State the full name and present address of each person whom you expect to call as an expert witness at trial for this case, and for each person identified, identify the subject matter on which each person is expected to testify, state the substance of the facts and opinions to which each person is expected to testify, and provide a summary of the grounds for each opinion expected to be given by these persons.

Dated: July 20, 2022

Plaintiffs  
BY COUNSEL

BINNALL LAW GROUP, PLLC



Jesse R. Binnall, VSB No. 79292

Jared J. Roberts, VSB No. 97192

BINNALL LAW GROUP, PLLC

717 King Street, Suite 200

Alexandria, Virginia.22314

Phone: (703) 888-1943

Fax: (703) 888-1930

Email: [jesse@binnall.com](mailto:jesse@binnall.com)

[jared@binnall.com](mailto:jared@binnall.com)

Gene P. Hamilton, VSB No. 80434

Andrew J. Block, VSB No. 91537

AMERICA FIRST LEGAL FOUNDATION

300 Independence Ave, SE

Washington, D.C. 20003

Telephone: (202) 836-7958

Email: [gene.hamilton@aflegal.org](mailto:gene.hamilton@aflegal.org)

[andrew.block@aflegal.org](mailto:andrew.block@aflegal.org)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via process server with the Complaint on the person named below:

**BRENDA SHERIDAN**  
21000 Education Court  
Ashburn, Virginia 20148



Jesse R. Binnell

*Counsel for Plaintiffs*

VIRGINIA:

IN THE CIRCUIT COURT OF LOUDOUN COUNTY

CLINT THOMAS, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Case No. 22003556-00
	)	
THE LOUDOUN COUNTY	)	
PUBLIC SCHOOLS, et al.,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT BRENDA SHERIDAN**

Plaintiffs request, pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, that Defendant Brenda Sheridan serve written responses to the following document requests and produce the requested documents within twenty-one (21) days of service to the office of the Binnall Law Group, PLLC, 717 King Street, Suite 200, Alexandria, Virginia 22314.

**DEFINITIONS**

1. The term "Plaintiff(s)" means any plaintiff unless specifically named.
2. The term "document(s)" means all written, printed, record or graphic matter, photographic matter, sound reproductions, or other retrievable data (whether recorded, taped, or coded electrostatically, electromagnetically, or otherwise) including the original and any non-identical copy and every draft of all correspondence, memoranda, notes of meetings, facsimiles, electronic mail ("e-mail"), voicemail, text messages, reports, transcripts or notes of telephone conversations,

diaries, notebooks, minutes, notes, tests, reports, analyses, studies, maps, charts, diagrams, spread sheets, balance sheets, income statements, statements of cash flow, and any other writings or documentary material of any nature whatsoever, together with all attachments thereto and enclosures therein.

3. The term “communication(s)” shall mean the interchange of thoughts, opinions, or information whether orally, electronically, or in writing, including, without limitation, text messages, messages sent via messaging applications (e.g., WhatsApp, Signal, etc.), e-mails, and social media posts of any kind.

4. The term “Complaint” shall mean Plaintiffs’ Complaint filed on June 29, 2022, against Defendants.

5. The term “psychiatric or psychological examination or test” shall have the meaning given at 34 C.F.R. § 98.4(c)(1).

6. The term “psychiatric or psychological treatment” shall have the meaning given at 34 C.F.R. § 98.4(c)(2).

### **REQUESTS FOR PRODUCTION**

1. All documents identified in any answer to your Interrogatories.

2. All communications with or between you and with or from any person regarding any Plaintiff or their children, from January 1, 2020, until the present, relating to the subject matter of the Complaint.

3. All documents mentioning, pertaining to, or regarding any Plaintiff or their children from January 1, 2020, until the present.



4. For the period January 1, 2021, to the present, all documents of, regarding, or concerning: (a) all psychiatric or psychological examinations or tests given to LCPS students; (b) all psychiatric or psychological treatment given to LCPS students; and (c) prior parental notice and consent for each such examination, test, or treatment.

5. All communications regarding and all documents of or pertaining to any and all notifications to Plaintiffs of the examinations, tests, and/or treatment identified in Interrogatory 5, above.

6. All documents pertaining to teacher training materials provided to LCPS by any outside consulting company from January 1, 2020, until the present on related to any of the following: Policy 8040 and/or Regulation 8040; LCPS's Culturally Responsive Framework; LCPS's Action Plan to End Systemic Racism; LCPS's Comprehensive Equity Plan; Social and Emotional Learning; and the Diverse Classroom Libraries.

7. All communications between you and any contractor or consultant whom LCPS has paid to provide consulting services related to any of the following: Policy 8040 and/or Regulation 8040; LCPS's Culturally Responsive Framework; LCPS's Action Plan to End Systemic Racism; LCPS's Comprehensive Equity Plan; Social and Emotional Learning; and the Diverse Classroom Libraries.

8. All evidence or research on which LCPS relied to set the criteria or standards for the Diverse Classroom Libraries referenced in your interrogatories.

9. All documents that you may use to support your claims or defenses.

10. All communications you had with any person regarding LCPS's policies or practices relating to parental notification and student privacy between January 2021 and the present.

11. All documents maintained in LCPS libraries, classrooms, teachers' files, and other resources accessed by LCPS within the last five (5) years pertaining to subjects regarding sexual orientation, gender identity, or race.

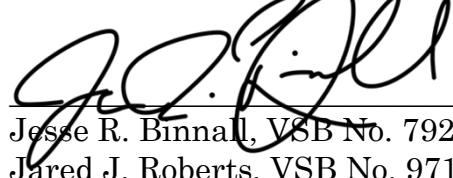
12. All communications with outside parties, including but not limited to attorneys and state legislators or administrative officials, regarding Policy and Regulation 8040.

13. All documents and communications pertaining to any alleged sexual assault occurring in any LCPS bathroom during the 2021-2022 school year.

Dated: July 20, 2022

Plaintiffs  
BY COUNSEL

BINNALL LAW GROUP, PLLC



---

Jesse R. Binnall, VSB No. 79292

Jared J. Roberts, VSB No. 97192

BINNALL LAW GROUP, PLLC

717 King Street, Suite 200

Alexandria, Virginia. 22314

Phone: (703) 888-1943

Fax: (703) 888-1930

Email: jesse@binnall.com

jared@binnall.com

Gene P. Hamilton, VSB No. 80434

Andrew J. Block, VSB No. 91537

AMERICA FIRST LEGAL FOUNDATION

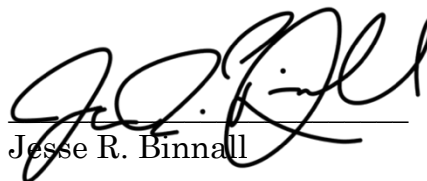
300 Independence Ave, SE  
Washington, D.C. 20003  
Telephone: (202) 836-7958  
Email: gene.hamilton@aflegal.org  
andrew.block@aflegal.org

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via process server with the Complaint on the person named below:

**BRENDA SHERIDAN**  
21000 Education Court  
Ashburn, Virginia 20148



Jesse R. Binnall

*Counsel for Plaintiffs*