

# Exh. 4:

## *Defendant Johnson's Written Discovery Responses*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY  
LONDON DIVISION  
CIVIL ACTION NO. 6:26-CV-00055-GFVT

ELIZABETH JONES.

PLAINTIFF

v.

JENKINS INDEPENDENT SCHOOL DISTRICT, et al.

DEFENDANTS

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**OBJECTIONS, ANSWERS, AND RESPONSES TO PLAINTIFF'S FIRST SET OF  
INTERROGATORIES, REQUESTS FOR ADMISSIONS, AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS OF DEFENDANT DAMIAN JOHNSON, IN HIS  
OFFICIAL CAPACITY AS SUPERINTENDENT OF THE JENKINS INDEPENDENT  
SCHOOL DISTRICT**

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The Defendant, Damian Johnson (“Johnson” or “Answering Defendant”), in his official capacity as Superintendent of the Jenkins Independent School District, by counsel, states as follows for his objections, answers, and responses to Plaintiff’s first set of interrogatories, requests for admissions, and requests for production of documents.

**GENERAL OBJECTIONS**

These responses are made solely for the purpose of this action. Each answer is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and any and all other objections on grounds that would require the exclusion of any statement contained herein if any request was asked of, or any statement contained herein were made by, a witness present and testifying in court. All objections and grounds for same are reserved and may be interposed at the time of trial.

The Answering Defendant objects to the Plaintiff’s interrogatories, requests for admissions, and requests for production of documents to the extent they seek documents which

are private or have no relevance to the issues in this case. The Answering Defendant also objects to the Plaintiff's interrogatories, requests for admissions, and requests for production of documents to the extent they are in violation of the Rules of Civil Procedure, which require that discovery be relevant to the subject matter involved in the pending action.

The Answering Defendant objects to any individual interrogatory, request for admissions, and request for production of documents and will withhold documentation in accordance with such objections, on the grounds and to the extent that the interrogatory or request seeks information, documents, or materials that may be protected by the attorney-client privilege, the attorney work-product doctrine, the consulting expert exemption protecting communications between agents of a party conducting an investigation in conjunction with litigation, the exemption protecting materials prepared in anticipation of litigation, the joint defense privilege, the witness statement privilege, or any other applicable privilege, immunity or exemption from discovery permitted under the Rules of Civil Procedure.

To the extent any given interrogatory, request for admissions, request for production of documents, or any portion thereof seeks to require the Answering Defendant to search for and/or obtain documents or information outside of his custody, possession, or control, the Answering Defendant objects to the Plaintiff's interrogatories requests for admissions, and requests for production of documents on the grounds that they are unduly burdensome, oppressive, overly broad, and outside the scope of discovery permitted under the Rules of Civil Procedure.

To the extent that any individual interrogatory, request for admissions, or request for production of documents seeks information concerning issues unrelated to those in this case, the Answering Defendant objects on the basis that the request is overly broad, unduly burdensome,

not reasonably calculated to lead to the discovery of admissible evidence and seeks irrelevant information.

The Answering Defendant objects to each interrogatory, request for admissions, or request for production of documents to the extent the information and/or documents are publicly available, already within the Plaintiff's possession, or are equally accessible to the Plaintiff.

To the extent that any individual interrogatory, request for admissions, or request for production of documents is confusing, vague, or misleading, the Answering Defendant has interpreted the interrogatory or request literally and not broadly and has answered or responded accordingly.

The answers herein are based upon the knowledge or information and belief acquired by the Answering Defendant to the present date and upon the current state of his preparation in connection with this action. Accordingly, the Answering Defendant reserves the right to supplement these answers.

By submitting these objections and answers, the Answering Defendant does not waive any objections as to relevancy, materiality and/or admissibility nor does it waive any right to produce in the future information or documents once an appropriate confidentiality agreement and protective order is in place. These answers and responses are made after a reasonable search and investigation have been conducted; however, as the investigation and discovery are continuing, the Answering Defendant may discover additional information or documents. As such, the Answering Defendant reserves the right to supplement his objections or responses and to rely on or use any information so discovered in future discovery or at trial.

The fact that the Answering Defendant answers part or all of any discovery propounded is not intended to, and shall not be, construed as a waiver by the Answering Defendant of all or

any part of his objection to any interrogatory or claim. The Answering Defendant incorporates all of the foregoing general objections into each and every one of his responses to the Plaintiff's interrogatories, requests for admissions, and requests for production of documents. Responses offered over objection are made in an open spirit of cooperation.

The Answering Defendant has not completed the investigation of the facts related to this case, has not completed discovery of this action, and has not completed preparation for trial. The following answers are given without prejudice to the production of subsequently discovered facts or evidence, or the presentation of facts or theories resulting from subsequently discovered evidence, reevaluation of existing evidence or evaluation of existing evidence in light of newly discovered evidence.

### **ANSWERS TO INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify every person who assisted you in the preparation of your responses to these Written Discovery Requests and provide each person's name, address, and telephone number.

**ANSWER:** **Damian Johnson with the assistance of counsel. Superintendent Johnson may only be contacted through the undersigned counsel.**

**INTERROGATORY NO. 2:** Identify all of the "social media posts" by Ms. Jones that formed the basis for imposing JISD's No Trespass order and the Modified No Trespass Order. If any such social media posts formed the basis for imposing one but not the other, identify which social media posts apply to each. Identify any documents that support your response to this Interrogatory.

**ANSWER:** **The relevant social media posts include:**

**Facebook post on or about November 26, 2025:** Ms. Jones shared photographs from a middle school basketball game and criticized the physical appearance of minor student depicted in the photographs. The comments to the Facebook post referenced said student's medical condition and ability to participate in athletics, which Ms. Jones further criticized.

**Facebook post on or about December 13, 2025:** Ms. Jones made another Facebook post sharing photographs from a middle school basketball game and included commentary criticizing an identifiable minor student's display of effort and passion during the game.

**Facebook post on January 25, 2026:** Ms. Jones posted AI-edited photographs of identifiable minor students, which depicted certain students as having deformities or additional limbs.

**Screenshots of the social media posts and comments are included as Jenkins BOE 1-8.**

**INTERROGATORY NO. 3:** For each "social media post" identified in Interrogatory No. 2, above, identify every JISD policy violated by each such post and explain in detail how each post violates each of those policies. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection.** This interrogatory seeks information protected by the attorney-client privilege, including the legal theories of Board counsel and the undersigned. Subject to and without waiving the foregoing objections:

**Policy 10.21 – Civility:** The social media posts referenced in Interrogatory No. 2 resulted in the disruption of school operations and the educational process (as explained in Interrogatory No. 17), which violates an express standard in Policy 10.21. The posts further violated Policy 10.21 as being written statements intended to harm individuals. Though Ms.

Jones' social media posts did not threaten physical harm, the posts were seen as harassing, misrepresenting, or belittling children associated with the school district.

**Policy 10.5 – Visitors/Recording Technology:** The social media posts referenced in Interrogatory No. 2 included photographs taken at JISD events. Ms. Jones's use of the photographs taken at said events materially disrupted events, prevented others from reasonably observing the event and participating in the event, and otherwise violated the legal rights of minor children.

**These policies are included herewith as Jenkins BOE 10-15.**

**INTERROGATORY NO. 4:** Identify every person who assisted you in the preparation of your February 5, 2026 Modified No Trespass Order and provide each person's name, address, and telephone number.

**ANSWER: Objection.** This Interrogatory seeks information protected by the attorney-client privilege and/or work product doctrine.

**INTERROGATORY NO. 5:** Identify every person who assisted in the preparation of the December 15, 2025 No Trespass Order and provide each person's name, address, and telephone number.

**ANSWER: Objection.** This Interrogatory seeks information protected by the attorney-client privilege and/or work product doctrine.

**INTERROGATORY NO. 6:** Describe in detail all of the reasons why, on February 5, 2026, you modified the No Trespass Order with your letter to Ms. Jones setting forth the Modified No Trespass Order.

**ANSWER: Objection.** This Interrogatory seeks information protected by the attorney-client privilege and/or work product doctrine. Subject to and without waiving the

foregoing objection, JISD has repeatedly emphasized that its main priority protecting and providing for the best interests of students. That, in conjunction with Ms. Jones’s compliance thus far, JISD found it appropriate to modify the ban to encourage Ms. Jones’s involvement in her children’s education while still preserving student welfare and the educational process.

**INTERROGATORY NO. 7:** Identify every extra-curricular event that occurred on school owned (or school leased) property from December 15, 2025 to February 5, 2026. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections:**

<b>Date</b>	<b>Event</b>	<b>Category</b>	<b>Location</b>
12/18/25	Middle School Volleyball Game	extra-curricular	Jenkins Middle High School Gym
12/19/25	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
12/20/25	Cavalier Christmas Bash Middle School Boys Basketball Tournament	extra-curricular	Jenkins Middle High School Gym
12/22/25	Cavalier Christmas Classic High School Boys and Girls Basketball Tournament	extra-curricular	Jenkins Middle High School Gym
12/23/25	Cavalier Christmas Classic High School Boys and Girls Basketball Tournament	extra-curricular	Jenkins Middle High School Gym
1/2/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/2/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/3/26	Cavaliers New Years Bash Middle School Boys Basketball Tournament	extra-curricular	Jenkins Middle High School Gym
1/5/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/5/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/7/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/7/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/12/26	Middle School Boys Basketball Game	extra-	Jenkins Middle High School Gym

		curricular	
1/13/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/13/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/17/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/17/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/21/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/21/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/24/26	Dance Cavs Recital	extra-curricular	Jenkins Middle High School Gym
1/30/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/30/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
1/31/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/2/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/2/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/3/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/5/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/5/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym

**The relevant supporting documentation is included herewith as Jenkins BOE 16-35.**

**INTERROGATORY NO. 8:** Identify every activity sponsored for or by the JISD that occurred from December 15, 2025 to February 5, 2026. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections:**

Date	Event	Category	Location
12/16/25	Board of Education	Board Meeting	Jenkins Middle High

	Meeting		School Library
12/17/25	Bible Club Play	student activity	Jenkins Middle High School Gym
1/8/26	Portrait of a Learner Workshop	community engagement activity	Jenkins Middle High School Library
1/13/26	Board of Education Meeting	Board Meeting	Jenkins Middle High School Library
1/29/26	Board of Education Meeting	Board Meeting	Jenkins Middle High School Library

**The relevant supporting documentation is included herewith as Jenkins BOE 16-35.**

**INTERROGATORY NO. 9:** Identify every extra-curricular event that occurred on school owned (or school leased) property that occurred from February 5, 2026 to April 9, 2026. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections:**

Date	Event	Category	Location
2/5/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/5/26	High School Boys Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/10/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/11/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/11/26	Esports Match	extra-curricular	Jenkins Middle High School
2/13/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/18/26	Middle School Girls Volleyball Game	extra-curricular	Jenkins Middle High School Gym
2/18/26	Esports Match	extra-curricular	Jenkins Middle High School
2/19/26	Middle School Girls Volleyball Game	extra-curricular	Jenkins Middle High School Gym
2/19/26	Esports Match	extra-curricular	Jenkins Middle High School
2/20/26	High School Girls Basketball Game	extra-curricular	Jenkins Middle High School Gym
2/25/26	Esports Match	extra-	Jenkins Middle High School

		curricular	
3/4/26	Middle School Girls Volleyball Game	extra-curricular	Jenkins Middle High School Gym
3/4/26	Esports Match	extra-curricular	Jenkins Middle High School
3/5/26	Esports Match	extra-curricular	Jenkins Middle High School
3/7/26	Middle School Volleyball B,C,D Tournament	extra-curricular	Jenkins Middle High School Gym
3/10/26	Middle School Girls Volleyball Game	extra-curricular	Jenkins Middle High School Gym
3/11/26	Esports Match	extra-curricular	Jenkins Middle High School
3/13/26	Middle School Girls Volleyball Game	extra-curricular	Jenkins Middle High School Gym
3/14/26	Middle School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
3/18/26	Middle School Volleyball County Tournament	extra-curricular	Jenkins Middle High School Gym
3/19/26	High School Softball Game	extra-curricular	Jenkins Middle High School Softball Field
3/19/26	Cheerleading Showcase	extra-curricular	Jenkins Middle High School Gym
3/20/26	Middle School Volleyball County Tournament	extra-curricular	Jenkins Middle High School Gym
3/21/26	Middle School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
3/21/26	High School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
3/23/26	High School Softball Game	extra-curricular	Jenkins Middle High School Softball Field
3/26/26	High School Softball Game	extra-curricular	Jenkins Middle High School Softball Field
3/27/26	Middle School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
3/27/26	High School Boys Volleyball Game	extra-curricular	Jenkins Middle High School Gym
3/28/26	Middle School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
3/31/26	High School Softball Game	extra-curricular	Jenkins Middle High School Softball Field
3/31/26	Middle School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
4/4/26	Middle School Baseball Tournament	extra-curricular	Jenkins Middle High School Baseball Field
4/6/26	High School Baseball Game	extra-	Jenkins Middle High School

		curricular	Baseball Field
4/6/26	High School Softball Game	extra-curricular	Jenkins Middle High School Softball Field
4/8/26	High School Baseball Game	extra-curricular	Jenkins Middle High School Baseball Field
4/8/26	High School Softball Game	extra-curricular	Jenkins Middle High School Softball Field
4/9/26	High School Boys Volleyball Game	extra-curricular	Jenkins Middle High School Gym

**The relevant supporting documentation is included herewith as Jenkins BOE 16-35.**

**INTERROGATORY NO. 10:** Identify every activity sponsored for or by the JISD that occurred from February 5, 2026 to April 9, 2026. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections:**

<b>Date</b>	<b>Event</b>	<b>Category</b>	<b>Location</b>
2/9/26	Middle School Baseball Parent Meeting	parent engagement activity	Jenkins Middle High School Library
2/12/26	Elementary Dance	student activity	Burdine Elementary Multipurpose Room
2/12/26	Cavalier Dadvocay Meeting	parent engagement activity	Jenkins Middle High School
2/14/26	Middle School Dance	student activity	Jenkins Middle High School Cafeteria
2/24/26	Preschool & Kindergarten Registration	school-sponsored activity	Burdine Elementary School
2/24/26	Board of Education Meeting	board meeting	Jenkins Middle High School Library
2/26/26	Math Family Night	parent engagement activity	Burdine Elementary School
2/27/26	Archery 8th Grade Recognition	student activity	Jenkins Middle High School Gym

3/3/26	Elementary Cheer Parent Meeting	parent engagement activity	Jenkins Middle High School Cafeteria
3/5/26	Preschool & Kindergarten Registration	school-sponsored activity	Burdine Elementary School
3/12/26	Cavalier Dadvocay Meeting	parent engagement activity	Jenkins Middle High School
3/14/26	Pee Wee Basketball Games	school-sponsored activity	Jenkins Middle High School Gym
3/20/26	Blood Drive	school-sponsored activity	Jenkins Middle High School
3/21/26	Pee Wee Basketball Games	school-sponsored activity	Jenkins Middle High School Gym
3/24/26	Family Science Night	parent engagement activity	Burdine Elementary School
3/28/26	Pee Wee Basketball Games	school-sponsored activity	Jenkins Middle High School Gym
4/7/26	Career Fair	school-sponsored activity	Jenkins Middle High School Gym

**The relevant supporting documentation is included herewith as Jenkins BOE 16-35.**

**INTERROGATORY NO. 11:** Describe in detail whether JISD or your office afforded Ms. Jones advance notice before imposing the No Trespass Order or Modified No Trespass Order and, if not, why the failure to do so either did (or did not) violate the Jenkins Athletic Events Spectator Policy’s “Consequences for Misconduct” provisions.

**ANSWER:** No advance notice was provided. The Jenkins Athletic Events Spectator Policy allows for the immediate removal of spectators for severe misconduct. However, this policy is intended to address in-person spectator conduct. The No Trespass Order here was issued due to concerns with Ms. Jones’s social media activity and resulting disruption of school operations and the educational process, including repeated complaints received from parents regarding social media posts perceived as harassing,

**misrepresenting, or belittling children associated with the school district. Ms. Jones's conduct extended beyond the ordinary spectator misconduct contemplated by the progressive warning provisions contained in the Jenkins Athletic Events Spectator Policy and therefore was not directly applicable to the circumstances giving rise to the No Trespass Order.**

**INTERROGATORY NO. 12:** Describe in detail why the imposition of the No Trespass Order and Modified No Trespass Order deviated from the Jenkins Athletic Events Spectator Policy's graduated sanction provisions within the "Additional Notes" section.

**ANSWER: See Answer to Interrogatory No. 11.**

**INTERROGATORY NO. 13:** Identify each and every act that you contend Ms. Jones performed while on school owned (or school leased) property that formed the basis for the No Trespass Order or Modified No Trespass Order.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections, see Answer to Interrogatory No. 11.**

**INTERROGATORY NO. 14:** Identify whether (or not) JISD or your office has made an exception such that visitors to JISD events that are open to the public (e.g., sporting events, academic competitions, or performances to which the general public is admitted) may use personally owned recording devices to create photos, videos, or audios without prior permission from school officials. Identify any documents that support your response to this Interrogatory.

**ANSWER: As explained in Policy 10.5, JISD provides an exception to the Prohibition on Recording for individuals photographing and/or recording events in the**

**“public arena” so long as the individual does not materially disrupt the event, prevent others from observing the event, or otherwise violate legal rights.**

**INTERROGATORY NO. 15:** If JISD or your office has not made an exception responsive to Interrogatory No. 15, above, identify each and every individual against whom official action has been taken for photographing, videoing, or otherwise recording JISD events open to the general public. Identify any documents that support your response to this Interrogatory.

**ANSWER:** See Answer to Interrogatory No. 14. The exception only applies if the individual does not materially disrupt the event, prevent others from observing the event, or otherwise violate legal rights. If the individual’s actions materially disrupt the event, prevent others from observing the event, or otherwise violate legal rights, no such exception applies. In other words, the only instances in which JISD has not made an exception responsive to Interrogatory No. 15 is when the individual’s actions do not meet the requirements of the exception.

To the best of Johnson’s knowledge, Ms. Jones is the only individual to which the above exception did not apply during his tenure as Superintendent of JISD. Ms. Jones is the only individual whose actions have materially disrupted events, prevented others from observing events, or otherwise violated legal rights. To the best of Johnson’s knowledge, no other spectator has made posts harassing, misrepresenting, or belittling children associated with the school district. Johnson, however, cannot speak to any actions taken prior to his tenure as Superintendent.

**INTERROGATORY NO. 16:** Identify whether (or not) JISD or your office has instituted any adverse action, whether legal, administrative, or otherwise, against any person

since January 1, 2023 for violating JISD Policy 10.21 regarding Civility. For each such instance, describe in detail each and every fact that supported the adverse action. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections, since January 1, 2023, JISD has imposed suspensions, bans, or restrictions relating to disruptive conduct, confrontational behavior, safety concerns, or misconduct occurring on school property or during school-sponsored activities. These include:**

1. [REDACTED] March 18, 2024: [REDACTED] was banned from JISD properties and activities following reports to the district alleging that [REDACTED] was involved with distribution of illicit substances/paraphernalia on school property occurring on or about November 18, 2023.
2. [REDACTED] March 18, 2024: [REDACTED] was banned from JISD properties and activities following a verbal and physical confrontation involving other adults occurring during a high school baseball practice on school grounds.
3. [REDACTED] November 13, 2025: [REDACTED] was suspended from JISD properties and activities for two scheduled games following inappropriate and disruptive conduct occurring during a middle school boys basketball game, including entering the locker room area visibly upset and using profanity in the presence of students and staff. The suspension also required completion of an NFHS Sportsmanship Course prior to return.
4. [REDACTED] March 17, 2026: [REDACTED] was suspended from JISD properties and activities for two weeks following a verbal confrontation with another parent occurring during a pee wee basketball event at Jenkins Middle High School.
5. [REDACTED], March 17, 2026: [REDACTED] was suspended from JISD properties and activities for two weeks following a verbal confrontation with another parent occurring during a pee wee basketball event at Jenkins Middle High School. [REDACTED] was additionally removed from coaching responsibilities associated with the Jenkins Independent pee wee basketball program.

**All ban and suspension letters issued since January 1, 2023, are attached hereto as Jenkins BOE 36-40.**

**INTERROGATORY NO. 17:** Describe in detail each and every instance of disruption to the educational process referenced in No Trespass Order purportedly caused by Plaintiff's social media posts. For each such incident, also identify by name, address, and telephone number the individual(s) involved, and also provide the date(s), time(s), and location(s) of each such incident. Identify any documents that support your response to this Interrogatory.

**ANSWER: Objection. This Interrogatory is overly broad, vague, and unduly burdensome. Subject to and without waiving the foregoing objections, the disruption of school operations and the educational process referenced in the No Trespass Order were based upon multiple complaints, administrative communications, and operational concerns arising from Ms. Jones's social media activity involving minor student athletes participating in school-sponsored athletic events. Ms. Jones's posts resulted in repeated parent complaints to JISD, which required JISD to divert administrative and educational time and resources from ordinary school operations to address and respond to parents' complaints. This involved the review of complaints and social media posts, communicating with parents, the involvement of numerous building and district administrators, evaluation of district responsibilities regarding student safety, event operations, and ongoing interactions involving parents and spectators connected to school-sponsored athletic activities, and consulting with legal counsel regarding potential responses and student welfare concerns.**

**Specifically, JISD received numerous complaints and communications from multiple parents following each of Ms. Jones's posts referenced in Interrogatory No. 2 that**

expressed concerns that students were being publicly ridiculed, harassed, embarrassed, or targeted online, and concerns regarding repeated online commentary involving minor students, the effect upon the students involved, and the continued publication of content concerning children participating in school-sponsored athletic events, before the No Trespass Order and after. These individuals include:

- K [REDACTED] W [REDACTED] - [REDACTED]@ [REDACTED]
- A [REDACTED] C [REDACTED] - [REDACTED]@ [REDACTED]
- C [REDACTED] J [REDACTED] E [REDACTED] - [REDACTED]@ [REDACTED]
- T [REDACTED] T [REDACTED] - [REDACTED]@ [REDACTED]; (606) [REDACTED]
- A [REDACTED] P [REDACTED]
- E [REDACTED] C [REDACTED]
- R [REDACTED] P [REDACTED]

These communications were primarily received through email, Facebook Messenger, website submissions, social media comments, or other electronic communications. JISD does not currently possess residential addresses of any of the above-referenced individuals. To the extent that JISD has other contact information for each individual, such contact information is listed above and included in the communications included herewith as Jenkins BOE 41-60.

### REQUESTS FOR ADMISSION

**REQUEST NO. 1:** Admit that prior to imposing the No Trespass Order, neither JISD nor your office provided Ms. Jones with advance notice or an opportunity to respond.

**RESPONSE:** Admit.

**REQUEST NO. 2:** Admit that neither the No Trespass Order nor the Modified No Trespass Order provide a mechanism for Ms. Jones to appeal the adverse action.

**RESPONSE:** Deny.

**REQUEST NO. 3:** Admit that neither the No Trespass Order nor the Modified No Trespass Order is limited temporally to a finite amount of time.

**RESPONSE: Deny.**

**REQUEST NO. 4:** Admit that the Jenkins Athletic Events Spector Policy provided to Plaintiff's counsel by your attorneys on April 2, 2025 is an official policy of the JISD that was in effect during all relevant times in this action.

**RESPONSE: Deny.**

**REQUEST NO. 5:** Admit that the Visitors to School Policy (No. 10.5) provided to Plaintiff's counsel by your attorneys on April 2, 2025 is an official policy of the JISD that was in effect during all relevant times in this action.

**RESPONSE: Admit.**

**REQUEST NO. 6:** Admit that the Civility Policy (No. 10.21) provided to Plaintiff's counsel by your attorneys on April 2, 2025 is an official policy of the JISD that was in effect during all relevant times in this action.

**RESPONSE: Admit.**

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST 1:** Produce all documents identified in your responses to the Interrogatories above.

**RESPONSE: See documents identified as Jenkins BOE 1-121.**

**REQUEST 2:** Produce all documents reflecting your communications to others regarding the investigation of Ms. Jones, as well as the imposition of the No Trespass Order and Modified No Trespass Order.

**RESPONSE:** To the extent this request seeks information and documentation protected by the attorney-client privilege and work product doctrine, Johnson objects. Subject to and without waiving the foregoing objections, see Jenkins BOE 41-60 and 61-67.

**REQUEST 3:** Produce all documents reflecting communications you received from members of the JISD School Board regarding the investigation of Ms. Jones, as well as the imposition of the No Trespass Order and Modified No Trespass Order.

**RESPONSE:** Johnson has no documents responsive to this request.

**REQUEST 4:** Produce all documents reflecting communications you received from third-parties regarding the investigation of Ms. Jones, as well as the imposition of the No Trespass Order and Modified No Trespass Order.

**RESPONSE:** To the extent this request seeks information and documentation protected by the attorney-client privilege and work product doctrine, Johnson objects. Subject to and without waiving the foregoing objections, see Jenkins BOE 41-60, 68-89, 90, 91-104.

**REQUEST 5:** Produce JISD'S file relating to the investigation of Ms. Jones.

**RESPONSE:** Objection. This request is vague and ambiguous and could be subject to multiple interpretations. Additionally, this request is overly broad and unduly burdensome as it is not limited in time and scope. Johnson further objects to the extent this request seeks information and documentation protected by the attorney-client privilege and work product doctrine. Subject to and without waiving the foregoing objections, see Jenkins BOE 1-8, 41-60, 68-89, 91-104, and 105-17.

**REQUEST 6:** Produce all documents submitted to the JISD by third parties relating to the investigation of Ms. Jones, including any documents that initiated the investigation of her relating to her social media posts.

**RESPONSE:** To the extent this request seeks information and documentation protected by the attorney-client privilege and work product doctrine, Johnson objects. Subject to and without waiving the foregoing objections, see Jenkins BOE 1-8, 41-60, 68-89, 91-104, and 105-107.

**REQUEST 7:** Produce the official minutes, including any accompanying documents, from each and every JISD School Board meeting at which the No Trespass Order and Modified No Trespass Order was discussed, considered, or approved.

**RESPONSE:** Johnson has no documents responsive to this request.

**REQUEST 8:** Produce the official minutes, including any accompanying documents, from each and every JISD School Board meeting at which Plaintiff or Plaintiff's social media posts was discussed.

**RESPONSE:** See Jenkins BOE 108-121.

AS TO OBJECTIONS:

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2026, a true and correct copy of the foregoing was served via electronic mail to the following:

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