

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 DR. ASIA JONES**

Plaintiffs request, pursuant to Rule 4:8 of the Rules of the Supreme Court of Virginia, that Defendant Dr. Asia Jones 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 “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.

2. 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.

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

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

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

INTERROGATORIES

1. Describe your educational background and your career history, including any other schools or districts at which you have worked, and the position(s) you held while there. Please also include any specialized degrees, credentials, or certificates you have obtained.

2. Describe your work history within Loudoun County Public Schools (“LCPS”).

3. Describe your role in the development and implementation of LCPS Policy and Regulation 8040, beginning with the transition from Policy 1040 to 8040.

4. Identify all documents and communications used to train staff on the implementation of LCPS Policy 8040 and Regulation 8040 between August 1, 2021, and December 31, 2021.

5. Identify all consulting companies used to train teachers, at any school in the district, for the 2021-2022 school year. Include the name of the company, the nature of the services provided by that company, and include the name, email address, and telephone number of any person with whom you corresponded at the company.

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

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

8. 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.

9. Describe all instances you were aware of, as of August 31, 2021, in which a student lost family housing because of their gender identity.

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

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

12. Describe how a teacher or faculty member, consistent with Policy and Regulation 8040, could prevent a male student from verbally asserting a new

“consistently asserted gender identity” for the purpose of gaining access to a female bathroom or locker room.

13. Describe how a teacher or faculty member can, consistent with Policy and Regulation 8040, determine a student is falsely claiming a new “consistently asserted gender identity.”

14. 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.

15. Identify the name, address, and telephone number of each person likely to have discoverable information.

16. Describe the circumstances in which it would be appropriate to administer a psychiatric or psychological examination or test and/or provide psychiatric or psychological treatment to a student, without prior parental notification and written consent.

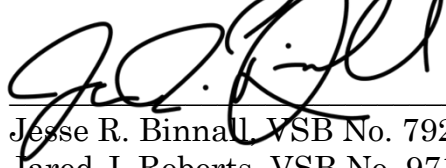
17. Identify the factors LCPS considers when deciding admissions for students to advanced level courses, including whether these considerations take into account race, sex, national origin, and/or religion.

18.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

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

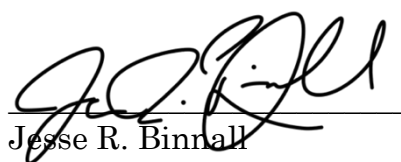
andrew.block@aflegal.org

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:

DR. ASIA R. JONES
21000 Education Court
Ashburn, Virginia 20148



Jesse R. Binnall

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 DR. ASIA JONES

Plaintiffs request, pursuant to Rule 4:9 of the Rules of the Supreme Court of Virginia, that Defendant Dr. Asia Jones 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.

REQUESTS FOR PRODUCTION

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

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

3. All communications you had with any person regarding the school district’s policies or practices relating to parental notification and student privacy between January 2020 and the present.

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

5. All documents concerning any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.


6. All documents concerning any denial of LCPS student-led Bible study.

7. All documents relating to admissions qualifications for advanced-level courses in LCPS.

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:

DR. ASIA R. JONES
21000 Education Court
Ashburn, Virginia 20148



Jesse R. Binnall

Counsel for Plaintiffs