

# YOUNG WILLIAMS

YOUNG WILLIAMS LAW FIRM, PC

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December 9, 2014

Dr. Bruce Borchers  
Superintendent of Oak Ridge City Schools  
304 New York Avenue  
Oak Ridge, TN 37830

Re: Tennessee Open Records Act Request Regarding Alexander Heitman

Dear Dr. Borchers:

On behalf of Trina Baughn, resident of Oak Ridge, Tennessee, herein please see the following request pursuant to T.C. A. § 10-7-301 et. seq.

Please provide a detailed estimate of the costs for fulfillment of this request. I am aware that your office has produced copies of Mr. Heitman's e-mails which have been available for review. Please do not include these materials into your calculations.

Un-redacted, complete copies of Mr. Hietman's official cell phone call history from July 20, 2010 through July 31, 2011.

Un-redacted, complete copies of Dr. Bailey's, Mr. Ken Green's and Ms. Karen Gagliano official cell phone call history from March 1, 2011 through July 31, 2011.

Copies of Dr. Bailey's and Mr. Ken Green's IRS FORM W-2 for each year they were employed with Oak Ridge Schools.

Any and all written statements or accounts, including but not limited to, memorandums, notes, e-mail correspondence, letters of Mr. Ken Green, Ms. Kathy Sheffield, Ms. Diane Ploof and Ms. Candy Jett provided to Dr. Bailey from their meetings with them on July 25, 2011 or the preceding week.

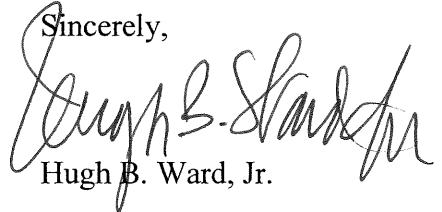
The names of all individuals who have access to Ms. Gagliano's and Dr. Bailey's signature stamp for the last 5 years and a copy of the access log for these stamps for that same

period.

Copies of all disciplinary actions taken or grievances regarding the following persons during their tenure with Oak Ridge Schools: Mr. Alexander Heitman, Ms. Pat Smith, Ms. Kathy Sheffield, Ms. Dana Bennett, Ms. Candy Lett, Ms. Diane Ploof, and Ms. Linda Price.

Please specify any statutory or legal limitation as a basis for omitting the herein requested materials.

Sincerely,

A handwritten signature in cursive script, appearing to read "Hugh B. Ward, Jr.", written in dark ink.

Hugh B. Ward, Jr.

HBW/em

cc: Trina Baughn  
Annette & Dan Heitman