

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

TERESA RHOADES and MICHAEL)
RHOADES as parents and next friends of)
CHELSEA RHOADES, a minor,)

Plaintiffs,)

v.)

Cause No. 3:05-CV-00586

PENN-HARRIS-MADISON SCHOOL)
CORPORATION, DAVID R. TYDGATE,)
DAVID RISNER, STEVEN HOPE, VICKIE)
MARSHALL, MARNI CRONK, and)
MADISON CENTER, INC.,)

Defendants.)

**PLAINTIFFS' RESPONSES TO DEFENDANTS PENN HARRIS MADISON
SCHOOL CORPORATION, DAVID R. TYDGAT, DAVE RISNER, STEVEN HOPE,
VICKIE MARSHALL AND MARNI CRONK'S REQUEST FOR
ADMISSIONS AND ALTERNATIVE INTERROGATORIES**

Come now the Plaintiffs, Teresa Rhoades and Michael Rhoades, as parents and next friends of Chelsea Rhoades, a minor, by Counsel, and submit their responses to Defendants' Request for Admissions and Alternative Interrogatories, basing their answers on personal knowledge and all information available to them through attorneys and/or agents. Said responses are attached hereto.

REQUEST FOR ADMISSION NO. 1:

While a student at Penn High School, Chelsea Rhoads has attended class assembly/assemblies featuring information regarding the Yellow Ribbon Campaign for Suicide Prevention.

RESPONSE: Admitted that Chelsea attended a mandatory general assembly of students to hear a presentation on suicide. Unable to respond as to

whether the session that she attended was a “Yellow Ribbon Campaign for Suicide Prevention”. Respondent would note that the family name is “Rhoades”, not “Rhoads”, as erroneously spelled throughout the Defendants’ discovery request.

ALTERNATIVE INTERROGATORY NO. 1:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 2:

The Yellow Ribbon Suicide Prevention Program promotes awareness of teen depression and suicide in an effort to prevent teen suicide.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 2:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 3:

CONNECT INC. was created by the St. Joseph County business community to provide coordination and collaboration between education, business and human services providers for the benefit of residents of St. Joseph County.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 3:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 4:

The Human Services Council of CONNECT, INC. identified a need for the detection and prevention of adolescent suicide following the suicide of Nick Sherbun, a student at Penn High School.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 4:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 5:

The Human Services Council created a Task Force to research programs and services for the detection and prevention of teen suicide.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 5:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 6:

The Human Services Council Task Force was community based and led by Madison Center.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 6:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 7:

According to the Indiana State Suicide Prevention Coalition, suicide is the second leading cause of injury-death in Indiana, and the third cause of death in 15 to 19 year olds in the United States.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 7:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 8:

The problem of teen suicide has a devastating effect on families and communities - lost children, lost loved ones. These losses are preventable.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission. Admit that the loss of any child by early death is devastating to the family involved.

ALTERNATIVE INTERROGATORY NO. 8:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 9:

Risk factors that are associated with adolescent suicide have been identified and include prior attempts, depression, anxiety, anger/aggression, substance abuse, low self esteem, poor problem solving, social isolation, feeling disenfranchised with school, and family distress.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 9:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 10:

The Task Force of the Human Services Council examined a variety of programs and services for the prevention of adolescent suicide.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 10:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 11:

In connection with the implementation of a community based identification and education program, the Task Force identified the Columbia University "TeenScreen" program as one option for the screening portion of its program for the prevention of adolescent suicide.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 11:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 12:

The Task Force of the Human Services Council also developed a school-based curriculum which PHM accepted and integrated into Penn High School's health education curriculum taught in the tenth grade.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 12:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 13:

Chelsea Rhoads participated in Penn High School's health education class in the tenth grade, which included the curriculum on suicide awareness and prevention.

RESPONSE: Admit. Chelsea participated in health class in her tenth grade.

ALTERNATIVE INTERROGATORY NO. 13:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 14:

PHM provided no funding for the utilization of or administration of TeenScreen at Penn High School.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 14:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 15:

The administration of TeenScreen was directed by the Madison Center, Inc.

RESPONSE: Admit to the extent that respondent admits that the Madison Center, Inc. was involved in the questioned activity. Denied as to the role of said entity, which is an issue in this case.

ALTERNATIVE INTERROGATORY NO. 15:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 16:

Chelsea Rhoads was present at a student convocation on October 15, 2004 for the Yellow Ribbon Suicide Awareness and Prevention Week.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission. Chelsea is unclear as to the date and name of a student assembly attended on this subject.

ALTERNATIVE INTERROGATORY NO. 16:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 17:

The Columbia University TeenScreen program was selected for use at Penn High School by the Task Force of the Human Services Council.

RESPONSE: Admit to the extent that respondent admits that a Teen Screen program was administered at Penn High School; but as to the entity selecting same the respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 17:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 18:

Penn Harris Madison did not produce, create or prepare the Columbia University TeenScreen instrument.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 18:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 19:

The Columbia University TeenScreen instrument is a tool, not an evaluation.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 19:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 20:

Kingsman Notes is the newsletter of Penn High School.

RESPONSE: Admit that *Kingsman Notes* is a newsletter of Penn High School.

ALTERNATIVE INTERROGATORY NO. 20:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 21:

Kingsman Notes is mailed periodically to the homes of all Penn High School students.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission. The respondent has no knowledge as to the mailing practices to Penn High School students, or others.

ALTERNATIVE INTERROGATORY NO. 21:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 22:

Plaintiffs have received copies of *Kingsman Notes* at their home during the period of time of Chelsea Rhoads' attendance at Penn High School.

RESPONSE: Admit that Plaintiffs have, on occasion, received copies of *Kingsman Notes* at their home during the period of time of Chelsea Rhoads' attendance at Penn High School.

ALTERNATIVE INTERROGATORY NO. 22:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 23:

The "Assent Form - Copy for Participant of Columbia University TeenScreen Program" and the TeenScreen survey itself were provided by representatives/agents/ employees of Madison Center, Inc. to Chelsea Rhoads on December 7, 2004.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 23:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 24:

Chelsea Rhoads signed a copy of the "Assent Form - Copy for Participant of Columbia University TeenScreen Program," attached as Exhibit A to Teresa Rhoads' Affidavit submitted as part of Plaintiff's Brief in Opposition to School Defendants' Motion for Summary Judgment, prior to participating in the TeenScreen survey on December 7, 2004.

RESPONSE: Admit, but any signature affixed was by a minor and without parental consent. Actual copy signed never given to her parents, either before or after signing.

ALTERNATIVE INTERROGATORY NO. 24:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 25:

During the administration of the TeenScreen survey, including the distribution and signing of the Assent Form, no administrator, agent, teacher, or employee of Penn Harris Madison or Penn High School was present.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 25:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 26:

The person from Madison Center who spoke with Chelsea Rhoads, after the administration of the TeenScreen survey, regarding Chelsea's results was the same person who was present during the distribution of the Assent Form and the administration of the TeenScreen survey.

RESPONSE: Admit, though the identity of said person is unknown to respondent at this time.

ALTERNATIVE INTERROGATORY NO. 26:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 27:

The person who spoke with Chelsea Rhoads after administration of the TeenScreen survey regarding Chelsea's results was a representative of Madison Center.

RESPONSE: Admit, though the identity of said person is unknown to respondent at this time.

ALTERNATIVE INTERROGATORY NO. 27:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 28:

During the discussion between the representative of Madison Center and Chelsea Rhoads, following the administration of the TeenScreen survey to Chelsea, the only two people present were the representative of Madison Center and Chelsea.

RESPONSE: Admit, though the identity of said persons is unknown to respondent at this time.

ALTERNATIVE INTERROGATORY NO. 28:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 29:

Prior to Mrs. Rhoads' inquiry to the Madison Center and Penn High School regarding the administration of the TeenScreen survey, information regarding Chelsea's results had not been provided to anyone at Penn High School.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 29:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 30:

Prior to Mrs. Rhoads' inquiry to the Madison Center and Penn High School regarding the administration of the TeenScreen survey, information regarding Chelsea's results had not been placed on any permanent record of Chelsea Rhoads.

RESPONSE: Deny that prior to Mrs. Rhoades' inquiry to the Madison Center and Penn High School regarding the administration of the TeenScreen survey, information regarding Chelsea's results had not been placed on any permanent record of Chelsea Rhoades.

ALTERNATIVE INTERROGATORY NO. 30:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial;
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE:

- a) Plaintiffs at address previously provided to Defendants.

Steven Bright
Madison Center for Children
701 N. Niles Ave.
South Bend, IN 46617

- b) Steven Bright provided to Plaintiffs a copy of the questions asked Chelsea Rhoades and the score sheet for Chelsea's examination.
- c) Fax Transmission Cover Sheet from Steve Bright dated December 9, 2004 and accompanying score sheet.
- d) Plaintiff Teresa Rhoades at address previously provided.

REQUEST FOR ADMISSION NO. 31:

Prior to Mrs. Rhoads' inquiry to the Madison Center and Penn High School regarding the administration of the TeenScreen survey, information regarding Chelsea's results had not been provided to anyone at Penn High School.

RESPONSE: The respondent has no information on which a response can be based. The respondent has no literature or other written information regarding the subject of this Request for Admission. The respondent has made reasonable inquiry and has no literature or other documents upon which a response can be based as to this subject. The information readily obtainable to the respondent is insufficient to enable the respondent to either admit or deny this Request for Admission.

ALTERNATIVE INTERROGATORY NO. 31:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and

- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 32

Prior to Mrs. Rhoads' inquiry to the Madison Center and Penn High School regarding the administration of the TeenScreen survey, information regarding Chelsea's results was confidential.

RESPONSE: Deny that prior to Mrs. Rhoads' inquiry to the Madison Center and Penn High School regarding the administration of the TeenScreen survey, information regarding Chelsea's results was confidential. The person who spoke with Chelsea, for example, had knowledge of Chelsea's results.

ALTERNATIVE INTERROGATORY NO. 32

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

REQUEST FOR ADMISSION NO. 33:

Chelsea Rhoads is able to read at grade level.

RESPONSE: Admit that Chelsea Rhoades is able to read at grade level.

ALTERNATIVE INTERROGATORY NO. 33:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: N/A

REQUEST FOR ADMISSION NO. 34:

Chelsea Rhoads has no disabilities which limit, impact on or impair in any way her cognitive abilities.

RESPONSE: Admit that Chelsea Rhoades has no disabilities which limit, impact on or impair in any way her cognitive abilities.

ALTERNATIVE INTERROGATORY NO. 34:

In the event that plaintiffs' response to Request for Admission No. 1 is anything other than an unqualified admission, explain in detail the factual basis for any complete or partial denial, and include in your answer:

- a) The name and address of any witness possessing information which supports the denial;
- b) The information obtained from each such witness which supports the denial;
- c) The description of any documents which support the denial; and
- d) The name and address of the current custodian of any document supporting the denial.

RESPONSE: See above.

DATED this 1st day of June, 2006.

Respectfully submitted,

JOHN R. PRICE & ASSOCIATES

s/John R. Price
John R. Price,
Counsel for Plaintiffs

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PARTICIPATING ATTORNEY FOR
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CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2006, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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