

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF LYNCHBURG

JENNA DODGE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. CL07-1917
)	
RANDOLPH COLLEGE,)	
)	
Defendant.)	

**DEFENDANT'S SECOND REQUEST TO
PLAINTIFFS FOR PRODUCTION OF DOCUMENTS**

Defendant Randolph College (the "College") requests that Plaintiffs respond to the following request for production of documents within the time and in the manner prescribed by the Rules of the Supreme Court of Virginia. The Definitions and Instructions in Defendant's First Set of Interrogatories and Requests for Production of Documents are incorporated herein (including without limitation the requirement that the documents be identified in a way to trace them to each producing Plaintiff):

1. As to each of Plaintiffs Dodge, Hassmer, Maxwell, McKean-Peraza, McCune, Mullins, Whittle, Williams and Sandos (the "Student Plaintiffs"), produce all emails, notes and other documents (including without limitation those with your family and friends), that relate in any way to the issue of why you chose to attend Randolph-Macon Woman's College.
2. As to each of the Student Plaintiffs, produce your admission application (including any essays) to the College, as well as those to any other institution of higher education.

3. As to each of the Student Plaintiffs, produce documents sufficient to show which art classes you took or have taken at the College.

4. As to each of the Student Plaintiffs, produce all emails, notes, student papers and other documents (including without limitation those with your family and friends), that mention or relate in any way to any of the Four Paintings at issue in this case, whether or not the Four Paintings are referred to specifically by name.

5. As to Plaintiff Hayley J. Maxwell, produce all emails, notes and other documents (including without limitation those with your family and friends), that mention in any way your decision to leave the College, your decision to attend Agnes Scott College, and/or your "intent to return to a restored Randolph-Macon Woman's College following the conclusion of the pending appeals" as stated in paragraph 4 of the Amended Complaint.

6. As to Plaintiff Jessica Whittle, produce all emails, notes and other documents (including without limitation those with your family and friends), that mention in any way your decision to leave the College.

7. As to Plaintiff Margaret Williams, produce all documents that support or relate in any way to your testimony at the November 8, 2007 hearing, including without limitation the papers mentioned on page 27 of the transcript, all documents that relate in any way to the allegations in paragraph 55 of the Amended Complaint, and all your communications with prospective employers as discussed on page 29 of the transcript.

8. As to Plaintiff Alice Dammeyer Priebe, produce all documents evidencing the "substantial donations toward scholarships at R-MWC" you have made, as alleged in paragraph 8 of the Amended Complaint.

9. As to Plaintiffs Frances Pendleton Elliott and Eleanor Pendleton Monahan, produce all documents that support the allegation made in paragraphs 9 and 10 of the Amended Complaint that you “are the only living relatives of Louise Jordan Smith”.

10. As to Plaintiff Roberta Scrivener, produce all documents evidencing occasions on which you have taken students to the Maier Museum as alleged in paragraph 16 of the Amended Complaint.

11. As to Plaintiffs Frances Pendleton Elliott, Eleanor Pendleton Monahan, Paul Whitehead, Jr., Sandra Whitehead, Roy Clinton Johns, Anne Adams Robertson Massie and Laura Katzman, produce all documents evidencing the money and/or artwork you have donated to the Maier Museum as alleged in paragraphs 9, 10, 14, 15, 17, 18 and 20, respectively, of the Amended Complaint.

12. As to Plaintiff Paul Whitehead, Jr., produce all documents that support or relate in any way to your testimony at the November 8, 2007 hearing.

13. As to all Plaintiffs, produce all documents regarding the Calvert Writing Award mentioned in paragraph 56 of the Amended Complaint.

14. As to Plaintiffs Ellen S. Agnew and Laura Katzman, produce all documents that relate in any way to your separation from the College, your decision to resign from your position at the College, the irreparable harm you have suffered or anticipate suffering as alleged in paragraph 138 of the Amended Complaint, your current reputation, your future employment opportunities, your efforts to find employment other than at the College (either before or after your resignation, including without limitation all applications made to, and correspondence including emails with, any other

prospective employers during or after your employment at the College), and your current employment, if any.

15. As to Plaintiff Ellen S. Agnew, produce all documents referenced in, or that support or relate in any way to, your testimony at the November 8, 2007 hearing.

RANDOLPH COLLEGE

By Counsel



Richard Cullen (VSB# 16765)
Gilbert E. Schill, Jr. (VSE# 12095)
Dennis I. Belcher (VSB# 15626)
Brian E. Pumphrey (VSB# 47312)
McGuireWoods LLP
901 East Cary Street
Richmond, Virginia 23219
804.775.1000 (telephone)
804.775.1061 (facsimile)

Bernard C. Baldwin III (VSB# 07497)
John M. Perry, Jr. (VSB# 43608)
Edmunds & Williams, P.C.
828 Main Street, 19th Floor
Lynchburg, Virginia 24504
434.846.9000 (telephone)
434.846.0337 (facsimile)

Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on December 31, 2007, a true and accurate copy of the foregoing Defendant's Second Request to Plaintiffs for Production of Documents was delivered by hand to the office of:

Anthony F. Troy, Esq.
William H. Hurd, Esq.
Melissa J. Roberts, Esq.
Troutman Sanders LLP
1001 Haxall Point
Richmond, Virginia 23218-1122

Counsel for Plaintiffs

and by mail to the office of:

Theodore J. Craddock, Esq.
Caskie & Frost
2306 Atherholt Road
Lynchburg, Virginia 24505

Counsel for Plaintiffs


