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1 the conversation that you said you had with
 2 Ms. Williams on, I believe you said, February
 3 25th 1999, do you recall asking her about
 4 anything in the letter being valid or any -- in
 5 other words, do you recall asking her whether or
 6 not she had any proof that there was lead in the
 7 water?
 8 A. No. I can tell you I just remember
 9 asking if you, Ms. Williams, had written the
 10 letter.
 11 Q. So you, more or less, focused on whether
 12 or not I had written the letter rather than the
 13 content of the letter; is that true to say that?
 14 A. That's correct.
 15 Q. Okay. So you don't know whether or not
 16 Ms. Williams could substantiate at that moment or
 17 at any other moment whether or not the content of
 18 that letter was true, you just went on, more or
 19 less, did I write it?
 20 A. At that point I asked you the question
 21 if you had written it. That's all I asked.

1 Q. I apologize.
 2 A. I did read the report -- I did read from
 3 '92-'93 the report from -- Mr. Elam, who works
 4 for us here in the system on environmental
 5 services, had advised me about the report and
 6 that there was a certificate for all schools that
 7 had been reviewed. When initially it began in
 8 '92-'93, all parents were notified. I did
 9 homework on that part.
 10 When I then met with Ms. Fields and the
 11 other person, as I mentioned, the principal, to
 12 find out what happened, then that information, as
 13 well as the study from Fairmount-Harford, was all
 14 given to --
 15 MR. WIGGINS: Ms. Abernethy, her
 16 question to you was did you read a report that
 17 indicated there was lead in the water prior to
 18 her asking you.
 19 A. Oh, no. I had no report prior to her
 20 talking to me in conversation.
 21 MR. WIGGINS: No. Prior to your

1 Q. Okay. Also, I would like to know, in
 2 regard to the point you made in regard to some
 3 report or to -- in regard to the lead in the
 4 water, did you receive any documentation from
 5 Ms. Fields or any other employee or agent of
 6 Baltimore City to inform you that there was --
 7 that Southeast had lead in the water prior to
 8 Ms. Williams' accusations or allegations?
 9 A. In the review of the Health
 10 Department -- the initial report from '92-'93, I
 11 did review that subsequent to a conversation with
 12 you, and realized that there were faucets turned
 13 off subsequent to that point, if that's that
 14 you're asking me, and --
 15 Q. No. I'm asking you did you review any
 16 reports that said that there was lead in the
 17 water prior to my allegations that there was lead
 18 in the water at Southeast.
 19 Have you reviewed any reports --
 20 MR. WIGGINS: Let her answer, ma'am. You
 21 asked your question. It's very clear.

1 conversation with her, have you read a report
 2 that had something about lead in the water?
 3 A. Absolutely nothing, until this letter
 4 came forward to me, and then I began getting some
 5 information on the school.
 6 MR. WIGGINS: And then after the
 7 conversation you read a report?
 8 A. That advised that certain fountains be
 9 turned off in Southeast Middle School because of
 10 deteriorated faucets.
 11 MR. WIGGINS: Because of the faucets?
 12 A. That's correct. And then we added
 13 water, because of -- that's what we took after
 14 '92-'93.
 15 MR. WIGGINS: I need for you to answer
 16 my questions and Ms. Williams' questions
 17 directly.
 18 THE WITNESS: I was confused about the
 19 timing when she said this to me, was it before I
 20 talked to her or after I talked to her.
 21 A. Nothing was before I talked to you.

1 After I talked to you, I then read the report.
 2 MR. WIGGINS: But the report dealt with
 3 the faucets and not with lead being in the water;
 4 is that correct, ma'am?
 5 A. I think there's a relationship there,
 6 that if the faucets were deteriorating and they
 7 weren't being run early in the morning, that
 8 there could be lead in the initial water coming
 9 from them; therefore, they were turned off in the
 10 '92-'93 report. So there was a relationship
 11 there between the faucet and the lead if you
 12 didn't turn that faucet off.
 13 MR. WIGGINS: Ms. Williams?
 14 Q. Okay. So, again, I'm trying to
 15 understand your answer.
 16 In other words, are you saying that,
 17 yes, you did read a report either before or after
 18 you had talked to me in regard to lead being in
 19 the water prior to my making the allegations?
 20 A. I read it after.
 21 Q. Okay. Thank you. Are you trained in

1 any aspect of lead in regard to what's acceptable
 2 or not acceptable?
 3 MS. HASKINS: I object.
 4 MR. WIGGINS: Why? It's a yes or no
 5 answer. If she's not trained, she'll just say
 6 no. You can answer that question, ma'am.
 7 A. I was ready with a simple no.
 8 MR. WIGGINS: Okay. Now,
 9 Ms. Williams.
 10 Q. All right. Did you -- again,
 11 backtracking a bit again to our conversation.
 12 Do you recall Ms. Williams saying
 13 anything other than the statement you made in
 14 regard to -- in fact, maybe I need to hear the
 15 statement again that you said that she repeated
 16 three times.
 17 A. It's in the very last paragraph of the
 18 February 25th, memo; if you can identify me as
 19 the person who has sent it, I'll take the charge.
 20 Q. Okay. Do you recall talking to her
 21 about anything other than asking her that same

1 question repeatedly?
 2 A. Unless -- your point to me was I won't
 3 answer that question unless you tell me what the
 4 school system is doing. That's all that was
 5 said.
 6 Q. Okay. And so that's, basically, all you
 7 talked to Ms. Williams about, was whether or not
 8 she had written the letter?
 9 A. Yes.
 10 Q. Did you recall Ms. Williams saying that
 11 since you have asked the same question repeatedly
 12 and we weren't getting anywhere with the results
 13 the conversation -- she would like to end the
 14 conversation at this time? Do you recall her
 15 mentioning anything in that regard? Maybe not
 16 exactly those words, but --
 17 A. I do remember that Ms. Williams said
 18 unless you can tell me what the school system is
 19 doing about the situation, I will not answer your
 20 question.
 21 Q. About what -- did she go into detail

1 about what situation?
 2 A. No. Unless the school system can tell
 3 me what -- unless you can tell me what the school
 4 system is doing about this situation, I am not
 5 going to answer your question, and then you hung
 6 up.
 7 MS. WILLIAMS: Okay. Thank you very
 8 much. No further questions.
 9 MR. WIGGINS: Any redirect,
 10 Ms. Haskins?
 11 MS. HASKINS: No.
 12 MR. WIGGINS: Let me ask you a question.
 13 I need to be clear on something.
 14 THE WITNESS: Sure.
 15 MR. WIGGINS: You called Ms. Williams on
 16 what date?
 17 THE WITNESS: On the 25th in the early
 18 afternoon, though I can't remember the time. She
 19 was taken out of a class. Ms. Fields would know
 20 the more exact time.
 21 MR. WIGGINS: The 25th, that's the date.

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1 You referred to a letter that you had received?
 2 THE WITNESS: Yes. Ms. Fields had faxed
 3 this letter to me that said to parents, lead in
 4 middle school, signed peace and blessings, and
 5 then this card was inside the same envelope sent
 6 to the parents, and this is a Xerox of the card.
 7 MR. WIGGINS: At the bottom?
 8 THE WITNESS: Yes. That's the letter I
 9 received, fax from Southeast Middle. It even
 10 says it on the top. That part tells you when it
 11 was faxed in, that's how I read it, and I talked
 12 to her immediately after that.
 13 MR. WIGGINS: Okay. Questions on my
 14 questions, Ms. Haskins?
 15 MS. HASKINS: No, sir.
 16 MR. WIGGINS: Questions on my questions,
 17 Ms. Williams?
 18 MS. WILLIAMS: No, sir.
 19 MR. WIGGINS: You may step down.
 20 THE WITNESS: Thanks a lot.
 21 MS. HASKINS: I would like to know if

1 Dr. Abernethy can now be excused from the
 2 hearing.
 3 MR. WIGGINS: You don't intend on
 4 calling her back later on for any reason?
 5 MS. HASKINS: No, sir.
 6 MS. WILLIAMS: I don't know. I may have
 7 to. It depends on other statements from
 8 witnesses. I'm not sure.
 9 MR. WIGGINS: If Ms. Williams needs
 10 later on, we may have to hold Dr. Abernethy.
 11 THE WITNESS: Excuse me?
 12 MR. WIGGINS: You have to wait, ma'am.
 13 MS. HASKINS: Sorry. Thank you.
 14 MR. WIGGINS: I'm guessing --
 15 Dr. Abernethy, hold on a second. I'm guessing,
 16 by the way things are going, we are going to be
 17 here a while. If you're looking at calling her
 18 for rebuttal, it's going to be later on in the
 19 day.
 20 THE WITNESS: I'm only three miles away.
 21 MR. WIGGINS: So I'm not going to hold

1 A. My name is Jane Ellen Fields, I am
 2 currently on assignment procurement as a staff
 3 specialist.
 4 Q. Could you please state your former
 5 position?
 6 A. I was most recently the former principal
 7 of Southeast Middle School.
 8 Q. How long were you the principal of
 9 Southeast Middle School?
 10 A. Two years, four months.
 11 Q. What is your educational background?
 12 A. I hold a BS degree in elementary
 13 education, a Master's degree in education, a case
 14 certificate of advanced study in education and
 15 administration supervision, and a JD degree.
 16 Q. How long have you served in the
 17 Baltimore City Public School System?
 18 A. It will be 30 years on October the 24th
 19 of 1999.
 20 Q. What were your duties as principal of
 21 Southeast Middle School?

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1 MR. WIGGINS: Excuse me. Ms. Haskins,

2 let me help you here. You have a lot of

3 witnesses and we're going to have a long day. If

4 you just get to their relevancy to Ms. Williams,

5 it's going to help us a lot.

6 I mean, I don't need to know her whole

7 educational background and I don't need to know

8 her duties. I know what a principal does. What

9 we need to know is what happened between her and

10 Ms. Williams, please, and that way we can move on

11 a little faster.

12 Q. Are you familiar with Diana Williams?

13 A. Yes, I am.

14 Q. How do you know her?

15 A. Ms. Williams was assigned to my building

16 in the '97 school year. I'm sorry. It would be

17 designated the '97-'98 school year.

18 Q. During that school year, was an issue

19 raised to you regarding Ms. Williams' activity as

20 a lead abatement specialist?

21 A. Indirectly, yes. There were occasions

1 where flyers and notices were put on cars with

2 Ms. Williams' name on them regarding other

3 schools, and other principals called me to find

4 out if she was in the building at times when

5 notices and letters were placed on their

6 teachers' cars.

7 Q. After you received that information,

8 what steps did you take?

9 A. In one case it involved Ms. Williams'

10 attendance -- let's do this chronologically. In

11 '97, before she actually reported to my

12 building, even though she was assigned, she

13 placed notices on my staff members' cars, or

14 someone did, with her name on them. That was

15 reported to my AEO.

16 The second incident is when a principal

17 called me and said that notices had been placed

18 on cars of her staff members, and the AEO did

19 call and ask Ms. Williams in the building

20 that day at school and what was her attendance.

21 There was not any need to take further

1 action because the AEO in both cases, I believe, or

2 wrote Ms. Williams, talked to Ms. Williams, or

3 did something.

4 Q. Okay. Subsequent to that, did you have

5 any other issues raised regarding Ms. Williams'

6 activities?

7 A. Ms. Williams' attendance has been a

8 problem, and I had had conferences and sent memos

9 regarding that, but prior to February 25th, all

10 activities involving professional

11 responsibilities, no other.

12 Q. On February the 25th, what action did

13 you take regarding Ms. Williams' activities?

14 A. Well, Ms. Williams had a lot of

15 activities. The incident prompted lots of

16 things. I asked Ms. Williams to come to my

17 office, I asked her -- I explained what had

18 happened as far as the letter was concerned, the

19 amount of activity and the disruption to the

20 educational program were concerned, I asked for a

21 response from her, and she said she'd get back to

1 me.

2 Q. That was on February the 25th?

3 A. Let me check dates and then I'll be

4 sure, because I keep careful notes. No. The

5 25th would have been the day of the letter

6 writing, which would be -- I never had a chance

7 to even get to Ms. Williams that day. That would

8 have been almost impossible. So I did not

9 contact her that day.

10 Q. When did you contact Ms. Williams

11 regarding that?

12 A. We actually talked, I believe -- once

13 things had settled down, I talked to her on a

14 Friday, asked for her response -- or I had told

15 her I was recommending an emergency suspension

16 without pay to be effective Monday morning, and

17 she told me that she would get back to me, that

18 she needed to think this over.

19 Q. Okay. What was she going to get back to

20 you about?

21 A. The response to the suspension, I

1 assume.
 2 Q. Okay.
 3 MS. HASKINS: I'd like to have
 4 Ms. Fields identify a memo that she wrote to
 5 Dr. Abernethy on March the 11th, 1999, please.
 6 MR. WIGGINS: We'll mark for
 7 identification as CEO Exhibit Number 2 a
 8 memorandum from Jane E. Fields to Dr. Abernethy
 9 dated March 11th, 1999.
 10 (Whereupon, CEO Exhibit No. 2 marked.)
 11 Q. Ms. Fields?
 12 A. This is a memo I sent to Dr. Abernethy
 13 summarizing the conference I had had with Diana
 14 Williams to inform her of the emergency
 15 suspension.
 16 I stated in the -- I listed the things
 17 that I stated in the conference, that she had
 18 created a disruptive atmosphere to the
 19 instructional program, and I delineated some
 20 things that had occurred, including all my
 21 contacts with many Baltimore City Public School

1 proclaimed in the foyer about the damn water
 2 several times. I asked her not to use profanity. She told
 3 she told me she wasn't using profanity. She told
 4 every student she could that she had been
 5 suspended.
 6 I cannot remember when she used the
 7 words I'm being fired, I'm not sure if it was
 8 that day or on Monday when she reported to the
 9 building, but she certainly wanted everybody to
 10 know what the terrible person I was and about the
 11 damn water. She caused such a disruption that I
 12 seriously considered removing her.
 13 MS. HASKINS: I'd like to move this
 14 document into evidence, please.
 15 MR. WIGGINS: Any objections,
 16 Ms. Williams?
 17 MS. WILLIAMS: No.
 18 MR. WIGGINS: Then we will allow it to
 19 be in evidence as CEO Exhibit 2.
 20 MS. HASKINS: A document dated Thursday,
 21 March 11th written by Jane Fields.

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1 offices.
 2 Based on those events, I had
 3 recommended an emergency suspension without pay
 4 effective Monday the 1st, I asked her not to
 5 report to the building -- actually, I told her
 6 not to report to the building on Monday, March
 7 1st, and that she would receive a letter from Dr.
 8 Booker via certified mail confirming it, and I
 9 offered her an opportunity to respond.
 10 I also wrote what Ms. Williams did.
 11 She asked me repeatedly to stop so she could take
 12 notes, she asked me how long it was for, I told
 13 her that would be Dr. Booker's decision, she
 14 tried to get the assistant principal that I had
 15 as an observer to participate after I had already
 16 stated at the beginning of the conference he was
 17 there for both of us and that he was not going to
 18 say anything.
 19 I tried to schedule this so that it
 20 would be toward the end of the day. After the
 21 conference, Ms. Williams went out and loudly

1 MR. WIGGINS: We'll mark as CEO Exhibit
 2 Number 3 for identification a memorandum from
 3 Jane E. Fields to Dr. Abernethy dated March the
 4 11th, 1999.
 5 (Whereupon, CEO Exhibit No. 3 marked.)
 6 Q. Ms. Fields, could you please identify
 7 this document for us?
 8 A. Yes. It's listing of the major media
 9 coverages that we contended with due to the
 10 letter that was sent, everything from phone calls
 11 to people showing up on the property, to have to
 12 give guided tours, to interruptions at dismissal
 13 time, to blocking of the driveway at one point,
 14 the fact that the Sunpaper put our school in the
 15 news.
 16 By the way, the Sunpaper never did
 17 contact me or talk to me, so it was kind of
 18 interesting.
 19 Each one was reported to Public
 20 Relations, Ms. Pyatt usually directly, and to the
 21 Southeast Area Office. It doesn't look like a

1 lot, but the time consumed was enormous.

2 Now, if -- do you want me to go through

3 each one very quickly or not?

4 Q. That won't be necessary.

5 MS. HASKINS: I'd like to move this

6 exhibit into evidence, please.

7 MR. WIGGINS: Any objections,

8 Ms. Williams?

9 MS. WILLIAMS: No.

10 MR. WIGGINS: It will be admitted as CEO

11 Exhibit Number 3.

12 MS. HASKINS: I'd like to hand

13 Ms. Fields another memo that she wrote on March

14 the 11th.

15 MR. WIGGINS: We'll mark for

16 identification as CEO Exhibit Number 4 a

17 memorandum from Jane E. Fields, again, to

18 Dr. Abernethy dated March 11th, 1999 in reference

19 to incidents of February 25th, 1999.

20 (Whereupon, CEO Exhibit No. 4 marked.)

21 A. This is a -- I'm sorry.

1 MS. HASKINS: Excuse me.

2 MR. WIGGINS: Yes?

3 MS. HASKINS: It references March 1st,

4 1999.

5 MR. WIGGINS: I'm sorry. What I have

6 here is incidents of February 25th, 1999.

7 MS. HASKINS: Oh, okay. I'm sorry.

8 THE WITNESS: That's the one you gave me

9 too.

10 MS. HASKINS: All right. My mistake.

11 Q. Could you please identify the document?

12 A. Yes. This is a very quick listing of

13 facts regarding the initial incidence that

14 occurred. On February 25th at about 10:45 I had

15 a call from one of my parents. It was most

16 unusual because this is an extremely cooperative

17 mother. She was very upset and she would only

18 speak to me, an assistant principal or secretary

19 would not do. I thought it was possibly a family

20 emergency because this parent is very well known

21 to me, a very cooperative parent, so I figured it

1 was something wrong at home.
2 So I answered the phone, and she
3 started telling me about this letter that she had
4 just gotten in the mail, and she was very upset.
5 She said it didn't look like our usual letter.
6 She didn't believe we sent it, but she wanted to
7 know who did. She said there was a card in there
8 with Diana Williams' name on it and who was Diana
9 Williams and did I want the letter.
10 She was as upset about the fact that
11 something came about the school not from the
12 school, she was upset that -- of some language
13 used in it, especially the word fatal. She had
14 had the children at the school and she trusted
15 me, she asked me what was going on, so I said I
16 couldn't answer but so much until I could see the
17 letter.
18 I asked her if it would be possible for
19 someone to come and get the letter, and she said
20 of course, she'd be glad to. I said I'd make
21 arrangements for someone to pick the letter up

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1 later, not realizing this was some kind of mass
2 mailing, because before I could get off the phone
3 I had another parent call me, Mrs. Smith, also
4 another parent that I had had a lot of dealings
5 with her child, who had been at our school for
6 three and a half years.
7 The mother was an extremely cooperative
8 mother, but she insisted on talking to me, which
9 is unusual, and she offered to either run the
10 letter over to the school or have somebody come
11 get it. I sent somebody to get it.
12 From then on, it was straight downhill
13 as the phone lines constantly -- my guess is at
14 least 50 percent of the calls would only talk to
15 me. I finally gave up at 20 minutes of 5 and
16 refused to answer the phone so that I could
17 finish the necessary work in the building so we
18 could open the next day.
19 People were extremely upset. The phone
20 lines were tied up totally. In fact, the Area
21 Office got so it was faxing us things that were

1 emergencies or things that needed to be done

2 immediately because they could not get through.

3 MS. HASKINS: I'd like to move this

4 document into evidence, please.

5 MR. WIGGINS: Any objections,

6 Ms. Williams?

7 MS. WILLIAMS: No, sir.

8 MR. WIGGINS: It will be admitted as CEO

9 Exhibit Number 4.

10 MS. HASKINS: Another document dated

11 Thursday, March 11th.

12 MR. WIGGINS: Okay. We'll mark for

13 identification as CEO Exhibit Number 5 a

14 memorandum from Jane E. Fields, again, to

15 Dr. Abernethy dated March 11th, 1999 in reference

16 to Diane Williams' actions of March the 1st,

17 1999.

18 (Whereupon, CEO Exhibit No. 5 marked.)

19 A. Okay. Basically, this listed what

20 happened on Monday, March the 1st.

21 MR. WIGGINS: Excuse me, sir. You're

1 either going to have to turn it off or step out.

2 MR. AYLES: I had it -- I'm sorry. Thank

3 you.

4 MR. WIGGINS: You may continue,

5 Ms. Fields.

6 A. To backtrack a bit, on Friday I had made

7 it very clear to Ms. Williams that she was not to

8 report to Southeast Middle School on Monday

9 morning and that she should receive a letter.

10 However, at 8 a.m. Ms. Williams did enter our

11 building and said that she had not received a

12 letter from Dr. Booker.

13 There is a piece of me that knows that

14 most principals would have said that she had to

15 leave the building because she was not to report,

16 but I also know personally that notice needs to

17 be given and she needs to get it besides word of

18 month, so I asked her to come into my inner

19 office and have a seat. She refused, and she sat

20 in the outer office.

21 I had a building to run, I move

1 I basically detailed to Dr. Abernethy

2 what had occurred, only because I was concerned

3 that Ms. Williams could not be watched every

4 minute, that she had left the office, and I'm not

5 sure of all the things she may have said to

6 parents and/or students during that time.

7 MR. WIGGINS: Do you want to enter that

8 into evidence, Ms. Haskins?

9 MS. HASKINS: I'd like to move this

10 document into evidence, please.

11 MR. WIGGINS: Any objections,

12 Ms. Williams?

13 MS. WILLIAMS: No, sir.

14 MR. WIGGINS: It will be entered as CEO

15 Exhibit Number 5.

16 MS. HASKINS: A document dated February

17 26th, 1999 written by Jane Fields.

18 (Whereupon, CEO Exhibit No. 6 marked.)

19 Q. Ms. Fields, can you please identify this

20 document?

21 A. Yes. Realizing, after even beginning an

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1 investigation, that there was a number of people
 2 who had received the letter with
 3 Ms. Williams' card in it talking about lead in
 4 the water and rereading her letter very
 5 carefully, having received a copy, there was a
 6 good chance that every student in the building
 7 may have received it.
 8 At that point I felt that parents
 9 needed communication, that maybe we could cut
 10 down some on the phone calls, and, also, because
 11 it was causing a complete disruption, this letter
 12 was composed and sent out with children, not by
 13 mail as Ms. Williams' letter was, but with
 14 children home at the end of the day to give to
 15 their parents.
 16 MS. HASKINS: I'd like to have this
 17 exhibit entered into evidence, please.
 18 MR. WIGGINS: Any objections,
 19 Ms. Williams?
 20 MS. WILLIAMS: No, sir.
 21 MR. WIGGINS: Okay. We enter as CEO

1 Exhibit Number 6 a letter from Jane E. Fields to
 2 parents of Southeast Middle School students dated
 3 February 26th, 1999.
 4 MS. HASKINS: A document dated February
 5 25th, 1999.
 6 MR. WIGGINS: Thank you.
 7 Q. Ms. Fields, could you please --
 8 MR. WIGGINS: We'll mark for
 9 identification as CEO Exhibit Number 7 a
 10 memorandum from Jane E. Fields, Principal, to
 11 Dr. Abernethy dated February 25th, 1999.
 12 (Whereupon, CEO Exhibit No. 7 marked.)
 13 Q. Ms. Fields, could you please identify
 14 this document?
 15 A. This is a letter detailing the water
 16 situation to the best of my knowledge. In 1993,
 17 there was a result that there were a -- it says
 18 here available in three areas of the -- let me
 19 see.
 20 Okay. It is not the faucet, it's the
 21 mouthpiece on the fountain, that is causing the

1 problem. The lead in the water comes from the
 2 mouthpiece. This had been an ongoing problem
 3 since June 28th, 1993. It is not building wide,
 4 it affects particular fountains as they
 5 deteriorate.
 6 The letter details to Dr. Abernethy the
 7 fact that we've had bottled water in the
 8 building, that we've turned off fountains, that
 9 water systems are flushed, where the locations of
 10 the bottled water are, the fact that we've moved
 11 them around several times, that we've had an
 12 increase in the bottled water because of the
 13 continuing factor that fountains will break,
 14 spigots begin to go.
 15 They were increased in February from
 16 three to, I think -- from four to six or seven.
 17 I gave the locations where the bottled water can
 18 be found so that people would realize that they
 19 are on all levels in all areas.
 20 MS. HASKINS: I'd like to have this
 21 document moved into evidence, please.

1 MR. WIGGINS: Any objections?
 2 MS. WILLIAMS: No, sir.
 3 MR. WIGGINS: It will be admitted as CEO
 4 Exhibit Number 7.
 5 MS. HASKINS: This is a fax dated
 6 2-25-99.
 7 MR. WIGGINS: We'll mark for
 8 identification as CEO Exhibit Number 8 what
 9 appears to be a cover sheet of a fax from Jane
 10 Fields to Dr. Abernethy dated February 25th, 1999
 11 and the attachments thereto.
 12 (Whereupon, CEO Exhibit No. 8 marked.)
 13 Q. Ms. Fields, could you please identify
 14 this document?
 15 A. Yes. It's the Health Department report
 16 and it's from February the 11th.
 17 Q. Could you please tell us why this report
 18 was generated?
 19 A. Jack Elam gave me a call, said that
 20 Diana Williams had called the Health Department
 21 asked for an inspection of the building, he let

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1 me know that the Health Department was on its
 2 way. That was probably at 8:30 in the morning,
 3 and I think they were there probably by 9, 9:30.
 4 The Health Department said they had
 5 gotten a call, Mr. Elam arrived soon after the
 6 Health Department, and they did an inspection.
 7 Q. Do you know what the results were of the
 8 inspection?
 9 A. I'm going to have to run through it,
 10 because at the time I know the biggest problem
 11 was low water pressure, the fact that they made
 12 us turn on fountains we had turned off, including
 13 the one from 1993, because they have to turn them
 14 all on to test them all. So it took us a while
 15 to get all the fountains turned on.
 16 The results were -- and I'll have to
 17 actually run through these. I'm looking for a
 18 problem. Most of the problems do not involve
 19 lead in the water. I'm looking for anything that
 20 had anything to do with lead in the water.
 21 MR. WIGGINS: Is there a particular area

1 you want to direct her to, Ms. Haskins, in the
 2 report?
 3 MS. HASKINS: No. We're just trying to
 4 find out if the inspection revealed there was
 5 lead in the water.
 6 A. There is -- the biggest problem was mild
 7 deterioration. For example, in house center
 8 number 40 number 7 was turned off, had to be
 9 turned on. I'm trying to remember the ones we
 10 turned --
 11 MR. WIGGINS: Excuse me. Mr. Elam, is
 12 he going to testify today?
 13 MS. HASKINS: Yes.
 14 MR. WIGGINS: Why don't we have him give
 15 us -- is he -- I'm sorry. Who is the -- is there
 16 a custodian who is going to testify today as
 17 well?
 18 MS. HASKINS: No, sir.
 19 MR. WIGGINS: You mean other than
 20 Ms. Fields, there's no one from the school who
 21 will be more expert in the --

1 MR. WIGGINS: Okay. It will be admitted
 2 in as CEO Exhibit Number 8.
 3 MS. HASKINS: A document dated February
 4 the 16th.
 5 MR. WIGGINS: We'll mark for
 6 identification as CEO Exhibit Number 9 a
 7 memorandum from Jane E. Fields to Repair Shop,
 8 attention Mr. Crosby, dated February 16th, 1999.
 9 (Whereupon, CEO Exhibit No. 9 marked.)
 10 Q. Ms. Fields, can you please identify this
 11 document?
 12 A. Yes. It's my document that I sent to
 13 the repair shop to get the blitz team in to do
 14 all the little things that were shown in the
 15 Health Department report when they came out on
 16 the 11th.
 17 Q. And what is a blitz team?
 18 A. A blitz team is a repair team, and I was
 19 told that if I called for it using the Health
 20 Department number I would get the person faster
 21 Q. Okay. Did the blitz team repair

1 MS. HASKINS: From the school?
 2 MR. WIGGINS: Yes, as far as the issue
 3 of the maintenance of the building and --
 4 THE WITNESS: I probably know the most,
 5 not to interject.
 6 MR. WIGGINS: Let me speed this along
 7 then. Basically, to your knowledge, there was
 8 nothing in here about lead in the water; is that
 9 correct?
 10 A. Correct, except for the one that had
 11 already been turned off that had to be turned
 12 back on.
 13 MR. WIGGINS: In order for them to
 14 effect their inspection?
 15 A. Correct.
 16 MR. WIGGINS: Okay.
 17 MS. HASKINS: I'd like to move this
 18 document into evidence, please.
 19 MR. WIGGINS: Any objections,
 20 Ms. Williams?
 21 MS. WILLIAMS: No.

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1 you have any further verbal or written

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1 anything having to do with lead in water?
 2 A. Yes and no. The science sinks, which
 3 are not considered drinking water, had been
 4 labeled, but they had to be -- they did some
 5 repair work so that they can be used. Some were
 6 already turned off, some were turned off, but I
 7 wanted them disconnected so they couldn't be
 8 used. That's not drinking water, but we know not
 9 everybody follows directions.
 10 I'm looking to see what else. Almost
 11 all of it's sinks in science areas. Lead in
 12 water is a no-no. No, nothing.
 13 MS. HASKINS: Thank you. I'd like to
 14 move this document into evidence, please.
 15 MR. WIGGINS: Any objections,
 16 Ms. Williams?
 17 MS. WILLIAMS: Yes, sir. I'm looking
 18 and I'd like to refer back to Exhibit 8, as well
 19 as 9, if it's not --
 20 MR. WIGGINS: Tell me what your
 21 objection is and then --

1 objections? I mean, you opened that testimony up
 2 in direct. She did testify that she had to meet
 3 with her previously with regards to her
 4 attendance. She has a right to cross-examine her
 5 on that.
 6 Ms. Fields, can you answer the
 7 question?
 8 A. Yes. On several occasions I sent
 9 Ms. Williams memos and/or asked to meet with
 10 her. I can -- then starting Monday, September
 11 28th, 1998 I sent her a memo confirming our
 12 conference, the fact that it stated in there she
 13 had been late 15 times to school, and I referred
 14 her to the handbook, staff handbook, which gives
 15 the attendance reliability policy.
 16 There were several other issues, but
 17 moving onto attendance. I had spoken to her
 18 about her attendance. It got to the point of
 19 almost impossible.
 20 On February the 10th I had asked her to
 21 meet with me --

1 MS. WILLIAMS: Okay. The objection to
 2 Exhibit 9 is that, again, we're focusing on the
 3 lead in the water, and I don't see anything in
 4 regard to -- in either of these memos that's
 5 relevant to lead in the water.
 6 We're not interested at this time in
 7 replacement of defective faucets unless it's
 8 stipulated in here that there's lead in the
 9 water.
 10 MR. WIGGINS: Well, I understand your
 11 objection, but I'm going to allow it in as CEO
 12 Exhibit Number 9 --
 13 MS. WILLIAMS: Okay.
 14 MR. WIGGINS: -- because, basically,
 15 what Ms. Fields has spoken to is that she called
 16 in this team in direct response to the Health
 17 Department's report and they didn't find any
 18 problems that they needed to repair in order to
 19 abate any lead. Next question, Ms. Haskins?
 20 Q. Okay. Ms. Fields, in conducting your
 21 investigation of Ms. Williams' activities, did

1 MR. WIGGINS: February 10th when, ma'am?

2 A. 1999. I'm sorry. -- to please see me

3 as soon as possible, but no later than the close

4 of business on the 12th. She didn't keep the

5 appointment. Eventually, she did.

6 She was given the attendance

7 reliability that said that she had five absences

8 as of January 26th. She refused to sign the

9 notice and said that she wanted to check in the

10 handbook to make sure the attendance reliability

11 was in there, and the payroll clerk.

12 She was also given a notice that said

13 she had nine and a half absences for five

14 occasions. She refused to sign, even though it

15 was hand-delivered by my secretary with a listing

16 of the days absent and the occasions.

17 On Wednesday, the 24th I sent her a

18 memo that stated on Friday, the 25th at 2:00 you

19 and I met and had a conference. We had discussed

20 the fact that she had latenesses.

21 On February 10th I had sent her a

1 notice asking her to see me as soon as possible.

2 She had refused, so I had rescheduled her for the

3 third time on February 26th and told her it was

4 essential that she meet with me. That notice was

5 hand-delivered, but she refused to sign.

6 MR. WIGGINS: Well, no. I'm sorry.

7 February 25th, 1999?

8 A. Right, in the morning.

9 MR. WIGGINS: Oh, in the morning, prior

10 to the afternoon?

11 A. Right. I had already scheduled a

12 conference for her.

13 MR. WIGGINS: With regard to her

14 attendance?

15 A. Uh-huh.

16 MR. WIGGINS: Okay.

17 A. And she hadn't --

18 MR. WIGGINS: Next question.

19 A. We haven't finished. We have one more

20 notice.

21 MR. WIGGINS: I'm finished. Next

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1 question, Ms. Williams.

2 A. We then met on --

3 MR. WIGGINS: Ms. Fields --

4 THE WITNESS: She asked about

5 attendance, sir.

6 MR. WIGGINS: Next question,

7 Ms. Williams.

8 Q. Ms. Fields, I was listening to you as

9 attentively as possible, but all I really wanted

10 was for the 1998-1999 school year how many days

11 has Ms. Williams been absent and how many --

12 A. Prior to this incident, nine and a half.

13 Q. Nine and a half days absent. Thank you.

14 And latenesses, please?

15 A. I know it is 70 some since November.

16 Q. Do you have any documentation which you

17 would like to submit, please?

18 A. If you'd give me a moment. That's what

19 I was going to do. I'm sorry. I correct

20 myself. Since November 1st there were 70

21 latenesses, and prior to that there were 15, for

1 a total of 85 latenesses.

2 Q. Ms. Fields, did Ms. Williams have a

3 first period class during the 1998-99 school

4 year?

5 A. No, she did not.

6 Q. Okay. Also, did Ms. Williams talk with

7 you in the beginning of the school year in regard

8 to the new time arrival and departure for staff

9 and students?

10 Did she meet with you with

11 Ms. Kasmerksky, the Union rep, to talk with you

12 earlier in the school year in regard to problems

13 that she saw in regard to the new time schedule

14 and also due to the fact that the staff hadn't

15 been informed of a new time schedule until the

16 day that they arrived back to school, did she

17 mention any of those issues to you at any point

18 in time?

19 A. She inaccurately mentioned much of that

20 information.

21 Q. When you say inaccurately, could you

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1 explain that a little bit more, please?
2 A. Yes. Because staff was informed on
3 August the 15th when their notice letters were
4 sent out that the new hours of school time would
5 be 7:30 to 2:45.

6 Q. Okay. Did she, in fact, at this meeting
7 with you and Ms. --
8 MR. WIGGINS: Ms. Williams, I'm not
9 going any further with this.
10 MS. WILLIAMS: Okay.
11 MR. WIGGINS: Move on to another area of
12 questioning, please. I mean, basically, you
13 asked her to give you the documentation, and she
14 gave you documentation. Now, why you were late
15 doesn't matter.

16 MS. WILLIAMS: I appreciate that.
17 MR. WIGGINS: Let's move on.
18 Q. Yes. In regard to the lead issue, had
19 you a conversation with Ms. Williams -- did she,
20 in fact, call you one afternoon after school to
21 talk with you about lead at Southeast Middle or a

1 report that she had received, do you recall
2 her --
3 A. I remember a conversation that involved
4 that.

5 Q. Did she mention the fact -- did she
6 mention to you that she had results to show that
7 it was a level of lead in the water at Southeast
8 Middle that was higher than EPA standards, did
9 she mention that to you?
10 A. No, she did not.
11 Q. Okay. Do you recall telling her that if
12 she, in fact, would mention the fact that you had
13 this conversation that you would deny it, do you
14 recall telling her that?

15 A. No.
16 Q. Okay. In regard to the meeting that you
17 scheduled for Ms. Williams -- I guess it's
18 a -- on the 25th I believe, the 25th, not the
19 morning, but the afternoon meeting in regard to
20 her being suspended, do you recall sending her
21 any prior notice in writing that there was going

1 Q. You don't recall?
2 A. -- she did not.
3 Q. She did not say that. Do you recall her
4 asking Mr. Tafel to -- because you, in fact,
5 mentioned that she was taking notes.
6 Do you recall her asking Mr. Tafel,
7 after she had read over what you said, to verify
8 or to either attest or deny that these were your
9 sayings?
10 In other words, I was reading what you
11 were saying at the meeting -- Ms. Williams was
12 reading what you were saying and asked Mr. Tafel
13 to confirm those statements that you had made.
14 Do you recall me asking him that?
15 A. Yes.
16 Q. And do you recall him, more or less,
17 hunching his shoulders and all like -- in other
18 words, he didn't want to participate, he didn't
19 respond. Do you recall him doing that?
20 A. That is correct.
21 Q. Okay. So at that time, a few seconds

1 to be such a meeting? In other words, how do you
2 recall communicating to her this fact that there
3 was going to be a meeting?
4 A. I think I asked you to step to my
5 office.
6 Q. So you don't recall sending any
7 documentation or memorandum or letters scheduling
8 this meeting?
9 A. No.
10 Q. Was this a spontaneous meeting or you
11 just decided not to give her any type of prior
12 notice that there was going to be a meeting?
13 A. Due to previous patterns, I felt it best
14 for my school, my staff, to simply go to
15 Ms. Williams and ask her to come to my office.
16 Q. Okay. And at the meeting do you recall
17 Ms. Williams requesting that since she didn't
18 have proper representation that the meeting be
19 adjourned at this time until she had proper Union
20 representation there?
21 A. No. --

1 after that, do you recall, again, Ms. Williams

2 saying that she'd like to have this meeting

3 adjourned because Mr. Taffel wouldn't confirm or

4 deny, nor did she have the proper

5 representation? You're saying you don't recall

6 her asking you to adjourn the meeting?

7 A. As litigious as I am, if the magic words

8 representation had been used, then, yes, I would

9 have stopped, but the suspension request would

10 have still stood.

11 Q. Well, I didn't ask about that point at

12 this time. I'm trying to get to --

13 MR. WIGGINS: She answered your

14 question, Ms. Williams. Next question, please.

15 Q. Okay. In regard -- in looking at some

16 of -- in fact, I'd like to refer to your memo

17 dated February 27, Exhibit 6.

18 MR. WIGGINS: That's CEO Exhibit -- what

19 number is that?

20 MS. WILLIAMS: 6.

21 A. I need more specifics since mine are not

1 A. It was a combination letter with myself

2 and my AEO.

3 Q. Dr. Abernethy, the AEO, correct?

4 A. Correct.

5 Q. Are you, in fact, an expert on lead?

6 A. No, I am not.

7 Q. Okay. But you and Dr. Abernethy said,

8 in the first paragraph, please be advised that a

9 letter sent to you included inaccurate

10 information about the drinking water at Southeast

11 Middle School.

12 Now, you said that you're not an expert

13 on lead, so how can you presume that the

14 information was inaccurate, referencing, again --

15 A. Because I read the letter and I have a

16 Health Department report that was less than one

17 week old.

18 Q. Okay. In the Health Department report,

19 I didn't see where they actually tested the water

20 for lead. I saw where they turned the fountains

21 off, replaced, because of deterioration, but in

1 that report that you are referring to, did they

2 actually test the water for lead?

3 A. Ma'am, if it was positive, it would have

4 been written. If it is negative --

5 Q. I'm not asking --

6 MS. WILLIAMS: That's not her question,

7 Ms. Fields. Her question is did they test for

8 lead.

9 A. Yes.

10 Q. Could you show me the documentation --

11 or show us, rather, the documentation where they

12 tested for lead?

13 A. I would suggest that --

14 MR. WIGGINS: And that would be CEO

15 Exhibit Number 8.

16 A. Well, all I can say is the stated reason

17 to be there was to test for lead, the stated

18 reason they told me I had to turn fountains on

19 was to test for lead, and when they left and I

20 asked them, they said I would receive a copy of

21 this report and that they had not found any

1 numbered. Thank you very much.

2 Q. In regard to the memo dated February

3 26th --

4 MR. WIGGINS: No. That's a different

5 one. You said Exhibit 6.

6 MS. WILLIAMS: Oh, mine says February

7 26th.

8 MR. WIGGINS: My CEO Exhibit 6 is

9 February 26th, 1999, but it's a letter to the

10 parents.

11 MS. WILLIAMS: To the parents. I'm

12 sorry. From Ms. Fields, right?

13 MR. WIGGINS: It's a letter.

14 MS. WILLIAMS: Yes, sir.

15 MR. WIGGINS: Oh, okay. Go ahead. I'm

16 sorry.

17 MS. WILLIAMS: That's okay.

18 Q. In reading your first paragraph --

19 again, this was your letter, is that true, to the

20 parents? Did you write this letter to the

21 parents?

1 except in the one that was already turned off.

2 Q. So do you see anywhere in this

3 documentation that there is -- where they tested

4 for lead? That was my question. Because I

5 didn't see it. Maybe I overlooked it.

6 MR. WIGGINS: Ask your question and let

7 her answer it.

8 Q. I apologize. Yes. Can you note here on

9 this document where they actually tested for

10 lead, either in Exhibit 8 or in Exhibit 9?

11 A. You will have to give me a moment to

12 peruse it.

13 Q. Sure.

14 A. I don't mean to be argumentative, but it

15 doesn't say they tested for copper either, but

16 there is a place, number 3, where they said they

17 saw bare traces. So I'm not sure we would put on

18 a report that we tested for something that we did

19 not find.

20 MR. WIGGINS: No, Ms. Fields. You

21 didn't run the test. Her question to you is very

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1 straightforward. Is there anything on the --

2 A. I did not see on here any item, but I am

3 still perusing. Thank you. No, I do not see

4 anything in here that said that.

5 Q. Again, referring to Exhibit 6, your

6 letter, as well as you said you collaborated with

7 Dr. Abernethy in composing it, do you know what

8 the EPA's actual level is for safe lead in water?

9 A. No.

10 Q. Okay. In your third sentence it states

11 Southeast Middle was identified as one of the

12 schools that had more than 20 parts per billion

13 in certain areas when water was not flushed

14 before drinking.

15 Do you know that 20 parts per billion

16 is certainly over EPA standards for lead in

17 water? In other words, EPA --

18 MR. WIGGINS: Ask your question. The

19 question was stopped there. Ms. Fields?

20 A. Yes.

21 Q. Okay. Thank you. Therefore, in fact,

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1 in 1992-93, you would say that there was lead in

2 the water at Southeast Middle?

3 A. No, I would not. I would say there was

4 lead in certain areas. In fact, it involved one

5 water fountain.

6 Q. How would you know that?

7 A. Because it was the one at the time that

8 was tested that is in the report in the entire

9 file involving lead in the water, including the

10 report that is posted in the office.

11 Q. Do you have that with you?

12 A. No, I do not. It hangs in the office.

13 Q. Well, I -- okay. In other words, you

14 don't have anything to document the fact that

15 there were more than -- there was lead in water,

16 other than -- in one particular area, other than

17 what you're telling me by word of mouth?

18 A. Which year are you referring to,

19 Ms. Williams?

20 Q. I'm referring to the 1997-98 school

21 year, or we could go -- I'm sorry. Let's go back

Page 8

1 to 1992-93.

2 You don't have any documentation with

3 you that specifies exactly where the lead -- or

4 in what fountain or in what houses was the lead

5 in the water, you don't have any documentation

6 with you today?

7 A. No, I do not.

8 Q. So, therefore, how could you possibly

9 say that Ms. Williams -- in your first sentence

10 in that, please be advised that a letter sent to

11 you included inaccurate information if, in fact,

12 there was lead in the water in 1992-93, as stated

13 in your own letter?

14 A. Because there were inaccuracies in the

15 letter that was sent out.

16 Q. Did you, in fact, ask Ms. Williams,

17 prior to or even during the conference or the

18 preconference that you had prior to telling her

19 that she was on indefinite suspension, did you

20 ask her whether or not she had any documentation

21 to prove the content of her letter, or you didn't

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1 mention that -- oh, I'm sorry. Did you ask her?

2 A. No.

3 Q. You didn't find it necessary to ask her

4 about such information where you stated it was

5 inaccurate? Did you ask her -- you didn't find

6 it necessary to ask her was there any proof of

7 her allegations and you were going to suspend

8 her?

9 A. There were more inaccuracies than the

10 fact of the lead in the water.

11 Q. Well, I'm referring to the lead in the

12 water.

13 Did you ask her about her

14 documentation?

15 A. I did not ask her about that.

16 Q. Do you find the health and well-being of

17 our students crucial in running the school of

18 Southeast? In other words, do you find the

19 necessity to find out whether or not lead was in

20 the water an important factor or concern that

21 would impact the whole school? Did you find it

1 important to know whether or not there was lead

2 in the water?

3 MR. WIGGINS: Let her -- you asked

4 her --

5 MS. WILLIAMS: I'm sorry. I'm

6 repeating. I apologize.

7 MR. WIGGINS: -- the same question three

8 different ways. Just ask the question.

9 A. I was going to say, which question of

10 the three do you want me to answer?

11 MR. WIGGINS: Basically, her question is

12 --

13 A. I think health and safety is

14 important.

15 MR. WIGGINS: Okay. If lead in the

16 water was an issue, would it have been something

17 important for you to find out?

18 A. Are you asking that?

19 MR. WIGGINS: Yes.

20 A. Yes.

21 MR. WIGGINS: Next question, ma'am.

1 MS. WILLIAMS: Thank you.

2 Q. In the preconference -- again, referring

3 to the preconference of the 25th of February that

4 you had -- that you claim that you had with Ms.

5 Williams, did you have any

6 written -- did you give Ms. Williams any written

7 correspondence or documentation as to what her

8 charges were or what the accusations were at that

9 time, did you give her anything in writing?

10 A. I assume that you are speaking of the

11 conference that occurred in the afternoon.

12 Q. Absolutely, yes, ma'am.

13 A. No, I did not.

14 Q. You didn't -- okay. Why?

15 MR. WIGGINS: Because she didn't have

16 it. She's already testified to that earlier.

17 She said that it came over the next day with a

18 gentleman from the School Board. That's been

19 covered.

20 MS. WILLIAMS: Okay.

21 MR. WIGGINS: Move on, ma'am.

1 MS. WILLIAMS: At this time that will be

2 it in terms of questioning.

3 MR. WIGGINS: Any redirect,

4 Ms. Haskins?

5 EXAMINATION BY MS. HASKINS:

6 Q. Ms. Fields, what was Ms. Williams'

7 position at Southeast Middle School?

8 A. She was a mathematics teacher.

9 Q. Are part of her responsibilities as a

10 mathematics teacher to determine if there's lead

11 in the drinking water?

12 A. Not at all.

13 Q. I bring your attention to Baltimore City

14 Public School document number 9, the third page.

15 A. Are you talking exhibits?

16 Q. I'm sorry. The same one that

17 Ms. Williams just asked you about. Tuesday,

18 February --

19 MR. WIGGINS: CEO Exhibit 6.

20 MS. HASKINS: No. Number 9.

21 Q. February 16th.

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1 A. And we're going to what page,
2 Ms. Haskins?
3 Q. The third page. There's two-sided
4 pages.
5 A. Oh, okay.
6 Q. The first sentence, which says follow-up
7 inspection per lead report.
8 A. Right.
9 Q. What's this a follow-up inspection of?
10 A. The inspection on February the 11th.
11 MS. HASKINS: Thank you. I don't have
12 any more questions.
13 MR. AYLES: Excuse me.
14 MR. WIGGINS: No, no. You don't talk.
15 She might ask questions, but when I'm ready to
16 allow her to ask questions. Okay.
17 What sentence was that again, ma'am?
18 MS. HASKINS: The first sentence on the
19 third page of the report is official notice of
20 violations of health laws and regulations
21 observed during this inspection.

1 THE WITNESS: It looks like that.
2 MR. WIGGINS: I have that.
3 THE WITNESS: It's over here, just one
4 page, at the top.
5 MR. WIGGINS: It says what now?
6 MS. HASKINS: Follow-up inspection per
7 lead report.
8 MR. WIGGINS: Okay. Next question.
9 MS. HASKINS: I don't have any more
10 questions.
11 MR. WIGGINS: Okay. Now, recess,
12 Ms. Williams?
13 MS. WILLIAMS: Yes, I have a question.
14 I've kind of forgotten my train of thought, so at
15 this time I don't have any further questions.
16 MR. WIGGINS: Let me ask you a question,
17 Ms. Fields.
18 Assuming, for argument's sake, that
19 Ms. Williams is totally correct and there's lead
20 in the water that's a danger to the children,
21 would you have recommended her suspension and

1 areas.
2 MS. WILLIAMS: Okay.
3 MR. WIGGINS: You may step down,
4 ma'am.
5 MS. HASKINS: I would like to be
6 excused, please, to use the ladies room.
7 MR. WIGGINS: Let's have a short recess.
8 (Recess taken -- 11:05 a.m.)
9 (Ms. Glover left the hearing.)
10 (After recess -- 11:18 a.m.)
11 MR. WIGGINS: Back on the record.
12 ELAINE WHITE,
13 being first duly sworn to tell the truth, the
14 whole truth, and nothing but the truth, testified
15 as follows:
16 MR. WIGGINS: Ms. Haskins?
17 EXAMINATION BY MS. HASKINS:
18 Q. Okay. Could you please state your name
19 and position?
20 A. I'm Elaine White, principal of
21 Fairmount-Harford High School.

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1 Q. Do you know Diana Williams?

2 A. Yes, I do.

3 Q. Could you please tell us how you know

4 Ms. Williams?

5 A. Ms. Williams was a teacher in the

6 Fairmount-Hartford High School when I assumed the

7 principalship in 1991.

8 Q. How long was Ms. Williams at your

9 school?

10 A. At least six years.

11 Q. When did Ms. Williams leave your school?

12 A. Three years ago.

13 Q. When Ms. Williams left your school, where

14 did she go?

15 A. To Southeast Middle School, I believe.

16 Q. Okay. Mrs. White, could you please tell

17 us if any issue has been raised with you

18 regarding Ms. Williams' activities as a lead

19 paint specialist -- sorry -- lead abatement

20 specialist?

21 A. Could you repeat your question?

1 Southeast Middle and one other school, I can't

2 remember the name of it, I believe it was Mosher,

3 having problems with lead-based paint, and it may

4 have referenced water.

5 Q. Okay. As far as your personal contact

6 with Ms. Williams, have any issues been raised to

7 you regarding her activities as a lead abatement

8 specialist?

9 A. During the time that Ms. Williams was a

10 teacher at Fairmount-Hartford, as I said, I did

11 see communication where she said that she was a

12 lead abatement specialist. I don't know

13 whether -- I don't have any knowledge of whether

14 or not that's true.

15 Q. Okay. Ms. White, when Ms. Williams was

16 assigned to your school, did she herself raise

17 any issues with you regarding lead?

18 A. Yes. She expressed concern about the

19 dust that was in the building during a renovation

20 project, and she -- just general concern over the

21 dust in the building.

1 Q. Could you please tell us if any issue

2 has been raised to you regarding Ms. Williams as

3 a lead abatement specialist?

4 A. I don't know anything about her

5 qualifications, if that's what you're asking me.

6 Q. No. I'm asking about her activities

7 regarding the lead in the drinking water.

8 A. At Southeast Middle School?

9 Q. In contact with you.

10 A. No.

11 Q. Okay. Are you aware of any

12 communications from Ms. Williams regarding lead

13 in the drinking water?

14 A. At Fairmount-Hartford High School or at

15 any other school?

16 Q. Anywhere, at your school or anywhere

17 else.

18 A. I saw the article in the newspaper that

19 referenced lead in the drinking water at

20 Southeast Middle School. I've seen flyers that

21 referenced Fairmount-Hartford High School and

1 She did say that -- she did tell me

2 several times that the reports that were given

3 were inaccurate, and she did speak with me

4 several times saying that she could give me

5 accurate information concerning the reports that

6 were presented by Kennedy Krieger and Bayview.

7 Q. Okay. Ms. White, what was the purpose

8 of the renovation project of which Ms. Williams

9 complained of dust?

10 A. The purpose of the renovation project at

11 Fairmount-Hartford High School?

12 Q. Yes.

13 A. It was a phased, multi-systematic

14 renovation project that lasted approximately

15 three years.

16 MR. WIGGINS: For what?

17 A. To -- well, it was multi-systematic, as

18 I said. It was -- there was a new heating system

19 put in, there was a new plumbing system,

20 electrical system, the building was completely

21 painted, new flooring was put down, new window