

1 MR. AYRES: Right. Ms. Fields has  
2 mentioned that there was water -- that a faucet  
3 was turned off.

4 Is there any possible way that water  
5 could be in the system rather than one faucet?  
6 It seems to me Ms. Fields was trying to say that  
7 it was localized in one particular area or maybe  
8 two areas. Is that possible?

9 MS. WILLIAMS: Again, if the water is  
10 running from the same pipe -- not unless you have  
11 different pipes that were installed with  
12 lead-free solder or the pipes themselves weren't  
13 lead-based, then you will have -- you know, maybe  
14 this faucet not, but if all the pipes are on the  
15 same system, water's coming from the same pipes,  
16 it doesn't matter where you take the sample, sir,  
17 you're going to get the proper results.

18 MR. AYRES: No further questions.

19 MR. WIGGINS: Okay. You may continue,  
20 Ms. Williams.

21 MS. WILLIAMS: I had answered your

1 question. I don't remember what you said in  
2 regard to -- since they said that James Mosher --

3 MR. WIGGINS: Is that in the complaint,  
4 Ms. Haskins, James Mosher and Highlandtown?

5 MS. HASKINS: You mean about lead in  
6 their water?

7 MR. WIGGINS: Yes.

8 MS. HASKINS: No.

9 MR. WIGGINS: I mean about Ms. Williams  
10 conveying inaccurate information to the public,  
11 in general, at those two schools.

12 MS. HASKINS: I don't know. Would you  
13 like to look at the statement of charges?  
14 Because it doesn't say anything about that in the  
15 last one, referring to the other schools, number  
16 6.

17 MR. WIGGINS: Okay. Let me see what you  
18 got about James Mosher.

19 MS. WILLIAMS: Okay. Again, I sent -- I  
20 truly didn't have any desire to sample any other  
21 school, but I was just riding past the school, a

1 friend of mine lives in the area, and I happened  
2 to just notice -- and I hope I'm not talking too  
3 much.

4 MR. WIGGINS: I'm listening. Go  
5 ahead.

6 MS. WILLIAMS: Okay. I noticed that the  
7 school looked old and I'm looking on the outside  
8 -- I guess as a trained expert on lead, I  
9 immediately look at the building, look at the age  
10 of the building, and look at certain other  
11 features, and I noticed that there was quite a  
12 bit of chipping, peeling, flaking paint on the  
13 windows at James Mosher Elementary School, and  
14 I --

15 MR. WIGGINS: From the outside?

16 MS. WILLIAMS: From the outside, sir.  
17 That's a hazard in itself, especially if the  
18 windows are open and you have little ones in  
19 there, they are easily exposed to the lead dust,  
20 which is certainly created or enhanced if you put  
21 up and down the windows. It's going to create a

1 lot more lead dust.

2 Consequently, I sent a letter of  
3 complaint to MOSH in regard to what I had  
4 inspected as an expert on lead.

5 MR. WIGGINS: Now, did you go in and ask  
6 the --

7 MS. WILLIAMS: They wouldn't let me.

8 MR. AYRES: -- administrators,  
9 Ms. Williams, before you sent off this letter to  
10 MOSH? Did you tell them your concerns?

11 MS. WILLIAMS: Did I tell the principal  
12 at --

13 MR. WIGGINS: The administrators at  
14 James Mosher.

15 MS. WILLIAMS: No, sir, I did not.

16 MR. WIGGINS: Tell me why not.

17 MS. WILLIAMS: Well, when I went to see  
18 the young lady who's a friend of mine, it was on  
19 the weekend, sir, and I thought -- I know it  
20 was -- after the fact, even though I saw the  
21 situation on the weekend, I was feeling as though

1 wiping," and they found, again, lead dust above  
2 HUD's standards in some of the dust wipe  
3 samples.

4       Consequently, in their closing  
5 conference, they recommend "Inform the summer  
6 clean-up crew of the sampling results so they can  
7 adequately protect themselves while they perform  
8 their duties; perform more extensive sampling to  
9 determine the extent of the lead-bearing dust;  
10 abate the exterior and interior lead-bearing  
11 paint throughout the facility." Again, this is  
12 MOSH.

13       MR. WIGGINS: We'll mark for  
14 identification as Respondent's Exhibit 29 a  
15 report from the Department of Labor and  
16 Licensing, Maryland Department -- I'm sorry -- of  
17 Occupational Safety and Health, where an  
18 inspection report had been done of James Mosher  
19 Elementary School. The issuance date was August  
20 24th, 1998.

21       (Whereupon, Respondent's Exhibit No. 29

1 marked.)

2       MR. WIGGINS: And then we will mark for  
3 identification -- aren't these all the same  
4 reports, you have just broke them down in  
5 different sections?

6       MS. WILLIAMS: Yes, sir, because I  
7 wanted to -- I was pressed for time, so I didn't  
8 go into detail in some of the issues on them.

9       MR. WIGGINS: We will mark for  
10 identification Respondent's Exhibit 31, which  
11 appears to be another section of that report.  
12       (Whereupon, Respondent's Exhibit No. 31  
13 marked.)

14       MS. WILLIAMS: They were issued at  
15 different times to me. I had to request the  
16 information for some of it, so, of course, I  
17 didn't get it all at the same time.

18       MR. WIGGINS: And then we will mark as  
19 Respondent's Exhibit 32 what appears to be the  
20 third segment of the report, which Ms. Williams  
21 has testified that she has gotten from MOSH at

1 marked.)

2       MR. WIGGINS: Is it your intent to have  
3 that report entered into evidence, Ms. Williams?

4       MS. WILLIAMS: Yes, sir.

5       MR. WIGGINS: Any objections,  
6 Ms. Haskins?

7       MS. HASKINS: No.

8       MS. WILLIAMS: Here's some more reports,  
9 again, by Maryland Occupational Safety and Health  
10 in regard to James Mosher and other citations  
11 that were issued.

12       MR. WIGGINS: Okay. We will mark for  
13 identification as Respondent's Exhibit 30 -- by  
14 the way, Respondent's Exhibit 29 was taken into  
15 evidence.

16       Respondent's Exhibit 30 is a -- appears  
17 to be part of a report showing -- from the  
18 Department of Labor, Safety and Health  
19 Administration, covering James Mosher Elementary  
20 School.

21       (Whereupon, Respondent's Exhibit No. 30

1 separate times.

2       (Whereupon, Respondent's Exhibit No. 32  
3 marked.)

4       MR. WIGGINS: Yes?

5       MS. HASKINS: In reference to Number 30,  
6 I'm making an objection because this doesn't  
7 refer to asbestos or lead. This says something  
8 about hazards about storage within 17 inches from  
9 electrical panel and injury or illness potential  
10 for minor bruises in a cafeteria stockroom.

11       MR. WIGGINS: Okay. Number 30 will not  
12 be allowed in. Put it in the file. Next?

13       MS. HOLMES: I think you have to give  
14 her a little bit more time, because she hadn't  
15 registered her objection and you had gone on to  
16 32.

17       MR. WIGGINS: No. I marked them for  
18 identification.

19       MS. HOLMES: Oh, okay.

20       MR. WIGGINS: I'm giving her a chance to  
21 go over them.

1 in the evidence, and I would certainly think  
2 that, after reviewing the evidence, you could see  
3 that -- certainly refute the charges that I was  
4 just making up or just stirring up -- disrupting  
5 without anything -- any valid, concrete evidence  
6 to prove what I was saying.

7 MR. AYRES: In the documents that you've  
8 had admitted into evidence concerning Southeast  
9 Middle, do you feel as though any of those  
10 documents refute the charges lodged against you?

11 MS. WILLIAMS: Absolutely. I feel  
12 like -- I feel as though Ms. Fields' document of  
13 the 26th, I believe, of February 1996 proves,  
14 without even giving my results, that there was  
15 certainly a lead hazard as early as 1993, and,  
16 again, speaking now as an expert on lead, as I  
17 mentioned earlier, that if it was a problem in  
18 1993 and nothing has changed to correct that  
19 problem, then there certainly is lead in the  
20 water today, even today.

21 So I certainly feel like I've refuted

1 I do.

2 MR. AYRES: No further questions.

3 MR. WIGGINS: Okay. Any further direct,  
4 Ms. Williams, or have you finished your direct?

5 MR. AYRES: She doesn't understand, sir.

6 MS. WILLIAMS: I'm sorry. You said do I  
7 have any further direct?

8 MR. WIGGINS: Have you finished  
9 testifying right now?

10 MS. WILLIAMS: Yes, sir.

11 MR. WIGGINS: Now, Ms. Haskins, tell me  
12 what you want to do. Do you want an opportunity  
13 to review the documents before you  
14 cross-examine?

15 MS. HASKINS: Yes, please.

16 MR. WIGGINS: Okay. I'm going to give  
17 Ms. Haskins an opportunity to review the  
18 documents before she cross-examines you  
19 tomorrow.

20 You have your copy of the documents,  
21 correct?

1 the charge in terms of saying that I erroneously  
2 stated not only that, but with my documentation  
3 of the lead sample from MARTEL.

4 MR. AYRES: What was your position at  
5 Southeast Middle?

6 MS. WILLIAMS: I am a mathematics  
7 teacher.

8 MR. AYRES: You were a teacher?

9 MS. WILLIAMS: Yes, I am.

10 MR. AYRES: Do the words loco parentis  
11 mean anything to you?

12 MS. WILLIAMS: Yes, I'm familiar with  
13 that, in terms of -- I guess it means acting as a  
14 parent, parentis, and I see myself -- as a  
15 teacher for almost 20 years, the kids are more  
16 than just students to me. I have them more than  
17 their parents may see them, so I certainly feel  
18 as though they are my kids, they are my kids.

19 MR. AYRES: Do you feel as though you  
20 were acting in their best interest? ?

21 MS. WILLIAMS: Oh, no doubt. Yes, sir,

1 MS. WILLIAMS: Yes, sir.

2 MR. WIGGINS: Ms. Haskins, what I'm  
3 going to ask you to do, you will take with you  
4 the Respondent's documents and you will make a  
5 copy for yourself and return these to me tomorrow  
6 when we meet. Okay?

7 MS. HASKINS: Okay.

8 MR. WIGGINS: That's it for the day.

9 (Hearing adjourned -- 3:56 p.m.)  
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1 STATE OF MARYLAND SS:  
 2 I, ANN M. ROGERS, a Notary Public of the  
 3 State of Maryland, do hereby certify that the  
 4 within named witnesses personally appeared before  
 5 me at the time and place herein set out, and  
 6 after having been duly sworn by me, was  
 7 interrogated by counsel.  
 8 I further certify that the examination was  
 9 recorded stenographically by me and this  
 10 transcript is a true record of the proceedings.  
 11 I further certify that the stipulations contained  
 12 herein were entered into by counsel in my  
 13 presence.  
 14 I further certify that I am not of counsel  
 15 to any of the parties, nor an employee of  
 16 counsel, nor related to any of the parties, nor i  
 17 any way interested in the outcome of this action.  
 18 As witness my hand and notarial seal this  
 19 24th day of September, 1999.  
 20 My commission expires  
 21 June 1, 2003 Notary Public

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