

BEFORE THE KANSAS STATE DEPARTMENT OF EDUCATION
DUE PROCESS HEARING OFFICER

In the Matter of the Due Process Hearing Regarding
TOLGA ULUSEMRE and XIAOLEI XU, on behalf of AU ,

PARENTS,

v. No. 26DP229-001
Special Education Due Process

BLUE VALLEY U.S.D. 229,

RESPONDENT.

SPECIAL EDUCATION DUE PROCESS HEARING

AUGUST 26, 2025

VOLUME I

TINA M. WILLIAMS, RPR, CSR

MISSOURI CCR # 623

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Q Were you ever briefed by any district
official or Tonya Merrigan about AU or about us?

19

A No.

20

Q Or briefed? Did you hear anything about
AU or us from the district officials?

21

22

A No.

23

Q No one at the district told you anything
about AU or us?

24

25

A No.

1 Q They never mentioned our names, AU's name?

2 A They just said that you were coming to our
3 school and that when in fifth grade, that I was
4 going to receive her as my para.

5 Q And you never communicated with them about
6 us about AU?

7 MS. LOVETT-BOWMAN: I'm going to object.
8 Vagueness. I'm not sure who he's referring to.
9 I'll also go ahead and say the witness is not to
10 answer regarding any attorney-client communications.
11 I trust that you're not asking about any
12 attorney-client communication.

13 MR. ULUSEMRE: So does that include Mrs.
14 Hillman?

15 MS. LOVETT-BOWMAN: Yes.

16 Q Okay. Anybody. So Bob Schmidt, Tonya
17 Merrigan, did you ever communicate with these
18 individuals about us and AU, Bob Schmidt and Tonya
19 Merrigan?

20 A About what in particular?

21 Q About AU, about us.

22 MS. LOVETT-BOWMAN: Objection. Vague.

23 HEARING OFFICER NORRIS: You can answer.
24 Go ahead.

25 A I'm not sure if -- No, I didn't have

Q Or about us. You didn't have conversations with them about us?

Q By communications, you mean e-mails and
e conversations, in-person meetings?

[illegible]

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19 Q I want to clarify one thing. So you said
20 there were no communications between you and the
21 district officials, including Mark Schmidt, Tonya
22 Merrigan, about us and about AU.

23 A Correct.

24 MS. LOVETT-BOWMAN: I'm going to object
25 that this has been asked and answered.

1 MR. ULUSEMRE: Yes, but then you brought
2 up the privileged.

3 HEARING OFFICER NORRIS: Go ahead and ask
4 your question.

5 Q Yes. Does that mean that's privileged
6 information, you refuse to answer, or the answer is
7 no?

8 A I answered you.

9 Q No. So you -- okay. Is there a
10 difference between the two? If I ask for privileged
11 information, do you --

12 MS. LOVETT-BOWMAN: I think that's really
13 a question between counsel and Mr. Norris. She's
14 not allowed to divulge privileged communications.
15 Is that what you're asking her to tell you, whether
16 she's going to do that?

17 MR. ULUSEMRE: Do I remain silent or?

18 MS. LOVETT-BOWMAN: She is allowed to
19 invoke the privilege, and she doesn't -- she's not
20 going to testify as to privileged communications
21 with legal counsel.

22 Q So I just wanted to clarify whether Mrs.
23 Lewis said no to the question regarding whether that
24 was a communication between her and Miss Hillman or
25 was the answer privileged information? That's

1 privileged information was the answer or the answer
2 was no?

3 MS. LOVETT-BOWMAN: I don't understand
4 that question.

5 HEARING OFFICER NORRIS: Wait a minute.
6 If you're being asked to divulge communication that
7 you had with Miss Hillman, the district has asserted
8 the privilege, and you shouldn't answer that
9 question. If you're asking whether she had
10 communications with other Blue Valley people, not
11 lawyers, have at it. You may ask that question.

12 Q I see. So I can't ask her about her
13 communications with Spencer Fane lawyers, but I can
14 ask her communications between Miss Hillman and
15 herself?

16 MS. LOVETT-BOWMAN: No. Melissa Hillman
17 is general counsel. Her legal advice is just as --
18 is the same as mine. The privilege is the same.

19 MR. ULUSEMRE: So does Miss Hillman count
20 as Mrs. Lewis' attorney?

21 HEARING OFFICER NORRIS: She's general
22 counsel to the school district and she's an employee
23 of the school district. So if they had
24 communications, they're confidential. She isn't
25 required to divulge that. If she had similar

Q Okay. So can I ask a question again. Or your answer is no? Was there communication between you and Miss Hillman about me, about my wife, about our children.

[illegible]

A series of horizontal black bars of varying lengths, representing redacted text. The bars are stacked vertically, with some having small black squares to their left, possibly indicating bullet points or list items. The redaction covers the majority of the text content in this section.