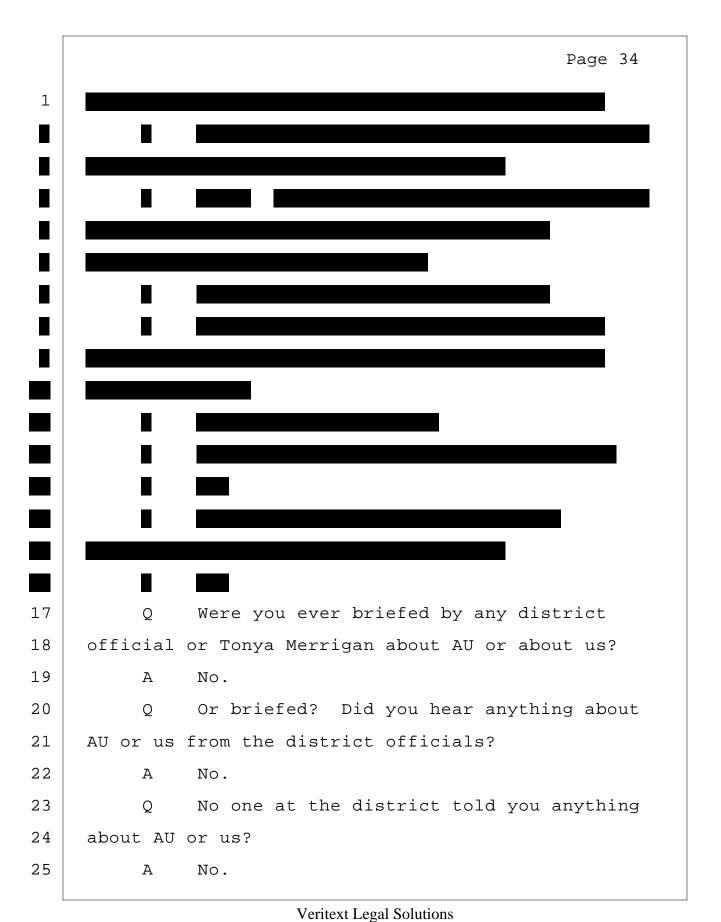
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1	BEFORE THE KANSAS STATE DEPARTMENT OF EDUCATION			
2	DUE PROCESS HEARING OFFICER			
3				
4	In the Matter of the Due Process Hearing Regarding			
5				
6	TOLGA ULUSEMRE and XIAOLEI XU, on behalf of AU ,			
7				
8	PARENTS,			
9				
10	v. No. 26DP229-001			
11	Special Education Due Process			
12				
13	BLUE VALLEY U.S.D. 229,			
14				
15	RESPONDENT.			
16				
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18	SPECIAL EDUCATION DUE PROCESS HEARING			
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21	AUGUST 26, 2025			
22	VOLUME I			
23				
24	TINA M. WILLIAMS, RPR, CSR			
25	MISSOURI CCR # 623			

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- Q They never mentioned our names, AU's name?
- A They just said that you were coming to our school and that when in fifth grade, that I was going to receive her as my para.
- Q And you never communicated with them about 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?

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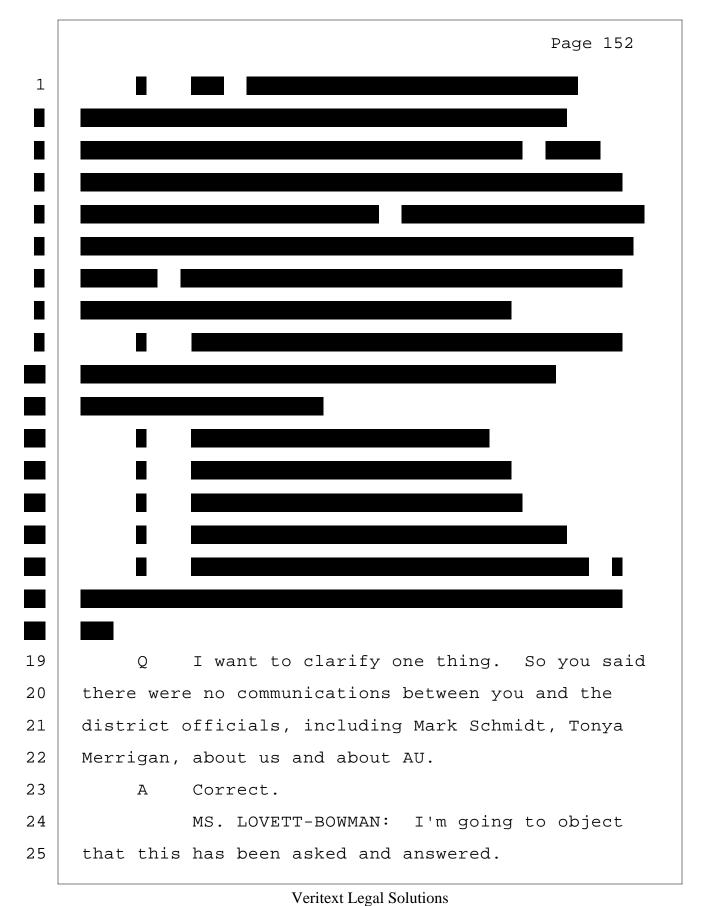
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- MS. LOVETT-BOWMAN: Yes.
- 16 Q Okay. Anybody. So Bob Schmidt, Tonya
- 17 Merrigan, did you ever communicate with these
- 18 individuals about us and AU, Bob Schmidt and Tonya
- 19 | Merrigan?
- 20 A About what in particular?
- 21 Q About AU, about us.
- MS. LOVETT-BOWMAN: Objection. Vague.
- HEARING OFFICER NORRIS: You can answer.
- 24 Go ahead.
- 25 A I'm not sure if -- No, I didn't have

Page 36 conversations about your son. 1 2 Or about us. You didn't have conversations with them about us? 3 4 Not that I recall. By communications, you mean e-mails and 5 phone conversations, in-person meetings? 6 Α Yes. 8



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

HEARING OFFICER NORRIS: Go ahead and ask your question.

- Q Yes. Does that mean that's privileged information, you refuse to answer, or the answer is no?
 - A I answered you.

2.0

- Q No. So you -- okay. Is there a difference between the two? If I ask for privileged information, do you --
- MS. LOVETT-BOWMAN: I think that's really a question between counsel and Mr. Norris. She's not allowed to divulge privileged communications. Is that what you're asking her to tell you, whether she's going to do that?
- MR. ULUSEMRE: Do I remain silent or?

 MS. LOVETT-BOWMAN: She is allowed to

 invoke the privilege, and she doesn't -- she's not
 going to testify as to privileged communications
 with legal counsel.
- Q So I just wanted to clarify whether Mrs.

 Lewis said no to the question regarding whether that was a communication between her and Miss Hillman or was the answer privileged information? That's

privileged information was the answer or the answer was no?

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

2.0

HEARING OFFICER NORRIS: Wait a minute.

If you're being asked to divulge communication that you had with Miss Hillman, the district has asserted the privilege, and you shouldn't answer that question. If you're asking whether she had communications with other Blue Valley people, not lawyers, have at it. You may ask that question.

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

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

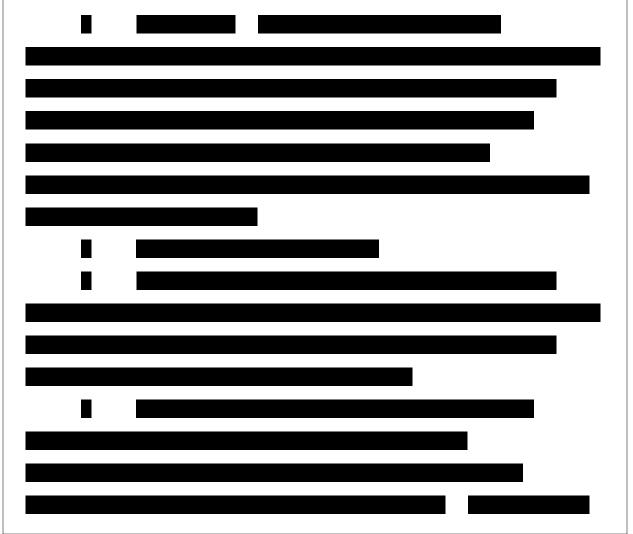
MR. ULUSEMRE: So does Miss Hillman count as Mrs. Lewis' attorney?

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

communications with Spencer Fane lawyers, she's not required to divulge that. If you want to ask her about communications she had with non-lawyers, have at it. Does that make sense?

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.

A That's lawyer privileged information.



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