

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

Tolga Ulusemre, and Xiaolei Xu, PLAINTIFFS

V.

CASE NO. 2:26-cv-2358-KHV-ADM

Toby Crouse, DEFENDANTS

Angel Mitchell,

Joseph Hatley,

Stephanie Bowman,

Madison Perry,

Blue Valley USD 229,

Spencer Fane, LLP,

SUPPORTING FACTS FOR ALL COUNTS

1. Spencer Fane, LLP, Joseph Hatley, Stephanie Bowman, and Madison Perry are citizens of the State of Missouri, whereas Toby Crouse, Angel Mitchell, and Blue Valley USD 229 (“Blue Valley”) are citizens of the State of Kansas.
2. Toby Crouse is a U.S. District Judge and Angel Mitchell is a U.S. Magistrate Judge, both in the District of Kansas.
3. Blue Valley is a school district in Kansas.
4. Spencer Fane, LLP, is a law firm in Missouri. Its lawyers Joseph Hatley, Stephanie Bowman, and Madison Perry have been representing Blue Valley against us in many cases.
5. In February 2023, Blue Valley’s Teachers Association led a conspiracy aimed at eliminating

our family from the school community. Towards this aim, it fabricated the allegations that our 8-year-old son D.U. had a murder list, his 10-year-old brother A.U. was trying to make bombs, and Tolga Ulusemre had been threatening the school staff.

6. As a result of these allegations, A.U., D.U., and Xiaolei Xu, who was working at the same school that A.U. and D.U. attended, were all unilaterally transferred to other Blue Valley schools in the middle of the semester, amidst publicly humiliating announcements that made the family look guilty of the allegations against them in the eyes of the entire community.
7. Since then, Blue Valley has been trying to cover up the incident by blacklisting our family. Towards this aim, Blue Valley created a hostile environment for our family and forced us out of the district. We had to unenroll D.U. in Spring 2024 and A.U. in Spring 2025 due to the hostile environment Blue Valley created, which is the equivalent of constructive dismissal.
8. After we unenrolled D.U. in February 2024, we filed a due process complaint against Blue Valley with the Kansas State Department of Education (“KSDE”) in May 2024, in the pursuit of truth, justice, and protection for our children.
9. Shortly afterwards, we came to see that KSDE administrative hearings are nothing but kangaroo courts. KSDE has total control over its Hearing Officers and Review Officers, i.e., Administrative Law Judges (“ALJs”), who make rulings not based on pleadings and evidence, but based on the tips and instructions they receive from KSDE, which, since the spring of 2023, had been actively covering up Blue Valley’s wrongdoings against our family (see “Exhibit A”).
10. For example, both KSDE and Angela Gupta dismissed our claims related to the February 2023 incident for not being relevant to due process complaints. Angela Gupta also quashed our subpoena aimed at obtaining our children’s private evaluation data for being irrelevant to due process complaints. Finally, she severely restricted the scope of our discovery request regarding Blue Valley’s internal emails about us, and threatened to shift the cost of Blue

Valley's email search cost to us.

11. While our first KSDE administrative hearing was going on, Blue Valley committed new violations against us. For example, Assistant Superintendent Mark Schmidt, who do not have any general or expert knowledge related to D.U., did not allow us to bring up bullying of D.U. in discussions, and then refused to hold a meeting, which resulted in our second due process complaint in September, 2024.
12. Angela Gupta, the Hearing Officer who was presiding over our first KSDE administrative hearing, unlawfully consolidated our first and second due process complaints. She basically went out of her jurisdiction and appointed the case to herself. Then she proceeded to dismiss the case, i.e., our second due process complaint, when we objected to the unlawful consolidation.
13. Soon after, Angela Gupta engineered the dismissal of our first complaint by bullying and tricking us into filing a motion to dismiss. Angela Gupta then dismissed our first complaint with prejudice. We did not appeal to Angela Gupta's order of dismissal, because both she and KSDE led us to believe that we did not have the right to do so (see "Exhibit B").
14. Since then, Blue Valley has been using Angela Gupta's two rulings to get our subsequent complaints and lawsuits dismissed, by making the bad faith arguments that any claim we make against Blue Valley is "frivolous and vexatious", and subject to "res judicata" and "statute of limitations", as if we have been trying to adjudicate the same issues that were dismissed in our first two due process complaints, and as if those issues were meritless or were heard in the first place.
15. The truth is that Blue Valley is so desperate to cover up the February 2023 incident that it consistently commits new wrongdoings as it attempts to silence us for good. For example, in September 2024, during a meeting regarding D.U., Blue Valley's board attorney Melissa Hillman, who does not have any general expert knowledge related to D.U., interrupted and

directed our team discussion, and badmouthed us in front of the school staff. One does not need to a psychic to understand how Melissa Hillman and other Blue Valley officials predispose the school staff against us. Yet, school attorneys are not even allowed to attend mediation meetings that take place after parents file a due process complaint, unless parents are accompanied by an attorney in the meeting, pursuant to K.S.A. 72-3416(a)(1).

16. Then in October 2024, Blue Valley principal Suzanne Martin refused to consider a safety plan for D.U., and at the same time threatened to report us for truancy. Consequently, we filed a third due process complaint in February, 2025, which was egregiously dismissed by the Hearing Officer Mike Norris on the pretext of res judicata and statute of limitations.
17. Similarly, after we failed to get Blue Valley to do a proper, accurate evaluation of A.U. in two school years, amidst a hostile environment in 2023-2024 and 2024-2025 school years, we unenrolled A.U. in May 2025, and filed a fourth due process complaint in July, 2025.
18. Mike Norris was again appointed to this complaint as the Hearing Officer, and egregiously dismissed the all the issues related to the 2023-2024 school year based on res judicata. His reasoning was that since we already filed a due process complaint for A.U. in May 2024, res judicata required all the claims that we “could have” brought back in May, 2024 to be dismissed.
19. However, A.U.’s 2023-2024 school year was never a part of our first due process complaint in May, 2024, as we were still optimistically working with the school staff to resolve the issues at the time (see “Exhibit C”). Both the two schools and the issues included in the first due process complaint regarding A.U., which concerned the 2022-2023 school year only, were different from the school and the issues included in our fourth due process complaint, which concerned the 2023-2024 and 2024-2025 school years (“see Exhibit C”).
20. This travesty of res judicata meant that we could not even bring up A.U.’s pre-Blue Valley educational records (A.U. started Blue Valley in Fall 2022) and any issue that occurred during

entire 2023-2024 school year in the proceeding, including A.U.'s evaluation in Fall 2023 and its underlying data.

21. Mike Norris also quashed the subpoena aimed at obtaining A.U.'s private evaluation data for being irrelevant.
22. Similarly, after Blue Valley repeatedly refused to share its records and the police report on the February 2023 incident with the school staff, we filed a fifth due process complaint in November, 2025. KSDE and Blue Valley again engineered the appointment of Mike Norris to the case, for the third consecutive time, although he recused himself soon after.
23. Our fifth due process complaint was later dismissed by the successor of Mike Norris, Athena Andaya, based on res judicata, statute of limitations, and lack of jurisdiction, which rubberstamped Blue Valley's and KSDE's broken record that the February 2023 incident is not relevant to due process complaints.
24. Similarly, in April 2026, out of the blue, Blue Valley informed us in writing that A.U. would be exited from services. When we challenged this notice, they threatened to report truancy and to hire a debt collector to obtain school fees from us. We also received a notice from Blue Valley, asking us to handle the remaining meal balance of A.U., who, according to the notice, had been "withdrawn" from Blue Valley.
25. Blue Valley basically wants to ensure that A.U.'s and D.U.'s unenrollments, or "constructive dismissals", are permanent, and that our family will never return to the school community.
26. If we file a due process complaint based on Blue Valley's any future wrongdoings against us, Blue Valley will again obtain a favorable ruling from KSDE-appointed ALJs by playing the "broken record" of "res judicata", "statute of limitations", and "frivolous and vexatious" lawsuits.
27. Also, Blue Valley, as it has always done since our first due process complaint, will prevent us from obtaining the key evidence that proves our allegations about Blue Valley's "constructive

dismissal”, such as: the police report on the murder list and bomb allegations against D.U. and A.U., which will reveal our children’s complete innocence; Blue Valley’s internal emails, which will reveal the schemes aimed at forcing us out; A.U.’s and D.U.’s evaluation data, which will reveal that Blue Valley doctored our children’s evaluations; A.U.’s and D.U.’s private evaluation data, which will reveal that private psychotherapist Tish Taylor doctored our children’s evaluations to obtain the results Blue Valley told her to produce.

28. Similar to the ones in KSDE administrative hearings, a judicial conspiracy is occurring in the Kansas Federal Court, involving Blue Valley, Judge Angel Mitchell, and Judge Toby Crouse.
29. In that regard, the plan/scheme/conspiracy involves doing everything it takes to prevent us from obtaining the key evidence mentioned above that proves our allegations about Blue Valley’s “constructive dismissal”, including: improper and prolonged discovery stay orders, such as the one in Case 24-4095 that has spanned 16 months, after over 200 filings as of this writing; out of place case consolidations with Case 24-4095 aimed only at making the added cases subject to discovery stay; multiple cases pending for several months for no good reason; prompt and premature denial of our motions aimed at completing the deficient administrative record, rulings and deadlines that are indicative of pre-determined outcomes, etc.
30. For example, in a preliminary injunction hearing on June 2, 2025, in Case 24-4095, which was held regarding the unreasonable and unjustified restrictions Blue Valley had been imposing on Tolga Ulusemre, Toby Crouse displayed his lack of familiarity with the basic facts of our Complaint.
31. For example, he did not know who Defendant Joann Woltman was, a key figure in the February 2023 incident. Despite lacking familiarity with such basic facts of the case, he still determined that Tolga Ulusemre was not likely to succeed in his First Amendment claims against Blue Valley.
32. Moreover, Joann Woltman, a Blue Valley parent who is a judge, was improperly, and in a

way that supported our conspiracy allegations about the February 2023 incident, represented by Blue Valley's lawyers. Toby Crouse asked Blue Valley's attorney Joseph Hatley during the hearing why they represented Joann Woltman, who is neither a current or a former Blue Valley employee. Joseph Hatley effectively avoided addressing the question.

33. In the same hearing, Judge Crouse casted doubt on Tolga Ulusemre's credibility by suggesting that his motion was written by someone else. One day after the hearing, on June 3, 2025, Judge Mitchell clearly stated in her order that our pleadings were too sophisticated to be written by pro se parties. Judge Mitchell's order suggested that our pleadings were possibly ghostwritten by a lawyer.
34. If we had been assisted by a lawyer, Judge Mitchell and/or Judge Crouse were going to proceed to dismiss most of our claims without affording us the procedural safeguards that are normally afforded to pro se parties. In that sense, there was a meeting of minds between Judge Mitchell and Judge Crouse, who were picking holes in our Complaint so that they could dismiss it more easily and reduce the likelihood of an overturn of dismissal in the case of an appeal.
35. In the hearing, Toby Crouse gave special treatment to Blue Valley by lowering the high bar of voluntary cessation, i.e., the "absolutely clear" standard, so much that the bar actually dropped to the floor. The 10th Circuit could not possibly affirm Toby Crouse's reasoning, which was just a bench ruling with no proper legal analysis and fact finding, but it still affirmed his denial of preliminary injunction on the grounds of prudential mootness. In other words, the 10th Circuit saved Toby Crouse's face by saying that he was right for the wrong reasons.
36. The one week that preceded the preliminary injunction hearing was eventful: KSDE Defendants changed their neutral position on the preliminary injunction motion to opposition; the Magistrate Judge who had been presiding over the case recused herself and was

immediately replaced by Judge Mitchell, who began to seek a knot in the bulrush of our process status two weeks later.

37. On May 22, 2025, we filed Case No. 25-2278, which was an appeal from our third due process complaint. The case was assigned to District Judge Holly Teeter and Magistrate Judge Teresa James.

38. On May 29, 2025, Case 25-2278 was reassigned from Teresa James to Angel Mitchell, and on May 30, 2025, from Holly Teeter to Toby Crouse.

39. On July 2, 2025, Angel Mitchell issued an order consolidating Case No. 25-2278 with Case No. 24-4095, which was primarily a Section 1983-1st Amendment Retaliation case, and at the same time denying our motion to sever the claims related to KSDE administrative hearings from Case No. 24-4095 and our motion to consolidate all claims related to KSDE administrative hearings in Case No. 25-2278 as moot.

40. If Angel Mitchell had not consolidated Case 25-2278 with Case 24-4095, or if she had granted our aforementioned two motions, in either case, the judicial review of our KSDE administrative hearings would have started back in July, 2025. Instead, our appeal from KSDE administrative hearings were made subject to discovery stay till February 26, 2026, and for no reason at all.

41. Then on July 10, 2025, we filed an expedited motion to sever all the claims related to KSDE administrative hearings, which was denied by Angel Mitchell on July 25, 2025.

42. On July 25, 2025 we filed our Complaint Case No. 25-2407, which was a primarily a section 1985 lawsuit against Spencer Fane and other lawyers who conspire against us with decisionmakers. Case 25-2407 was assigned to Judge Holly L. Teeter and Magistrate Judge Teresa J. James.

43. On July 28, 2025, Case No. 25-2407 was reassigned to Toby Crouse and Angel Mitchell.

44. On October 20, 2025, Angel Mitchell ordered discovery stay in Case No. 25-2407, pending

the motions to dismiss filed by the defendants of the case. As of this writing, these motions are still pending.

45. On November 17, 2025, we filed Case No. 25-2669, which was an appeal from our fourth due process complaint. The case was assigned to Toby Crouse and Teresa James.

46. On November 19, 2025, Case 25-2669 was reassigned from Teresa James to Angel Mitchell.

47. On February 12, 2026, Angel Mitchell consolidated Case 25-2669 with Case 24-4095, thereby making the former case subject to discovery stay.

48. On November 30, 2025, we filed Case No. 25-2708, Case No. 25-2709, Case No. 25-2710.

Judge Eric F. Melgren and Magistrate Judge Angel D. Mitchell were assigned to Case No. 25-2708, Case No. 25-2709 was assigned to Judge Daniel D. Crabtree and Magistrate Judge Angel D. Mitchell, and Case No. 25-2710 was assigned to Judge Holly L. Teeter and Magistrate Judge Angel D. Mitchell.

49. On December 3, 2025, Case No. 25-2710 was assigned from Judge Holly Teeter to Toby Crouse.

50. On December 4, 2025, Case No. 25-2709 was reassigned from Judge Daniel Crabtree to Toby Crouse.

51. On December 5, 2025, Case No. 25-2708 was reassigned from Eric Melgren to Toby Crouse.

52. Angel Mitchell ordered discovery stay in all these three cases, i.e., 25-2708, 25-2709, and 2710, on February, 23, 2026.

53. On December 22, 2026, we filed Case No. 25-2759, which was assigned to Judge John W.

Broomes and Magistrate Judge Angel D. Mitchell. On the same day, the case was reassigned from Judge John Broomes to Toby Crouse.

54. On January 12, 2026, Angel Mitchell issued an order denying as premature our motions for referral to mediation or settlement conference in Case 24-4095 and in Case 25-2407.

55. On April 27, 2026, in Case 25-2759, Angel Mitchell issued a scheduling order, which stated

that “should any party seek to stay discovery and the setting of deadlines (including those set forth above), the deadline for filing a motion to stay is May 7, 2026. The response deadline is May 14, 2026, and the reply deadline is May 18, 2026.”

56. In the light of all the discovery stay and consolidation orders issued in our cases by Angel Mitchell, this scheduling order signaled the defendants to file a motion to stay discovery.
57. On January 13, 2025, in Case 25-2709, Defendants filed a motion to dismiss. The language of this motion incriminated A.U. and D.U., which triggered us, who were further agitated by Defendant’s attorney Melody Rayl’s escalatory response when we reached out to her to retract her statements.
58. This was the last straw for us, who had been made subject to defamatory statements about themselves and their children, over and over and over again, since February, 2023. We still had not recovered from the similar incriminating language the corrupt lawyers Mike Fleming, David Cooper, Robyn Butler and Gregory Bentz used in their motions to dismiss filed in Case 25-2407 during the fall of 2025. This, combined with the incriminating language Blue Valley’s attorneys had recently used in their motion in January, 2026, in Case 24-4095, compelled us to stop the criminal defamation of our family once and for all, by filing a motion for sanctions against the aforementioned attorneys in the related cases.
59. Toby Crouse and Angel Mitchell overlooked our motions for sanctions, even though they were all fully briefed. The aforementioned attorneys misrepresented the motions as abuse of the legal system. However, a minimal discovery, such as the police report on the February 2023 incident, would have revealed who has been abusing whom, and would have stopped that abuse and led to truth and justice, as opposed to the travesty of justice that has been happening since we started litigating in May, 2024.
60. In fact, Michael Fleming, Gregory Bentz, Robyn Butler, as well as Blue Valley and its attorneys, all had a copy of the police report on the February 2023 incident, and hence they all

knew without a doubt that our children were completely innocent of the allegations against them. That means they knowingly engaged in the criminal defamation of our children in their motions.

61. On February 26, 2026, Angel Mitchell lifted stay on the claims related to KSDE administrative hearings, without offering any justification for it in the text-only order. Similar to the way there was no justification for making the claims related to KSDE administrative hearings to discovery stay, there was no justification for lifting the stay.
62. On April 6, 2026, a status conference was held to discuss proceeding on the claims related to KSDE administrative hearings. Attorneys Gregory Bentz and Katherine Sittenauer improperly attended the conference as if they were parties to the KSDE administrative hearings.
63. Gregory Bentz represents Clifford Cohen, a student rights lawyer, and Katherine Sittenauer represents KSDE, while due process complaints are legal disputes between school districts and students/parents that are presided over by KSDE.
64. In that regard, the participation of Katherine Sittenauer in the status conference is particularly egregious, as it unequivocally showed that KSDE, which was supposed to be independent and impartial, was siding with a school district against a student/parents. Thus, Katherine Sittenauer's participation made it conspicuous that KSDE administrative hearings are kangaroo courts.
65. This was exacerbated by Angel Mitchell's conduct during the conference, as she treated KSDE and Clifford Cohen as parties and asked them to provide input on the discussions.
66. On April 7, 2026, Angel Mitchell issued an order that stated: "defendants must produce the underlying administrative records to plaintiffs by May 6, 2026."
67. "Second, plaintiffs may file a motion for leave to serve discovery related to their IDEA claims by May 6, 2026. The following parameters apply to any such motion: Plaintiffs' motion to is limited to 7 pages; Plaintiffs must attach to the motion a copy of the discovery request(s) they

propose to serve; Defendants’ response is due 10 calendar days thereafter and is limited to 7 pages; Plaintiffs’ reply is due 3 business days thereafter and is limited to 2½ pages.”

68. “Third, any other motion related to an IDEA claim/counterclaim (e.g., for summary judgment) is due by June 6, 2026.”
69. The tight deadlines listed in this ruling clearly indicate that there was a “meeting of the minds” on precluding us from doing any discovery. In other words, it was predetermined that there would be a ruling on a motion for summary judgment on the claims related to KSDE administrative hearings before any discovery took place.
70. On April 18, 2026, we filed motion to lift discovery stay in Case 24-4095, based on the 10th Circuit’s ruling, which made it clear that our First Amendment Retaliation claim in Case 24-4095 cannot be dismissed on its face. This motion has been overlooked by Toby Crouse and Angel Mitchell.
71. On April 22, 2026, we filed a motion for leave to serve discovery related to our appeals from KSDE administrative hearings, namely Case 25-2278 and Case 25-2669. This motion has also been overlooked by Toby Crouse and Angel Mitchell.
72. On May 28, 2026, we filed a motion to compel Blue Valley to produce the administrative record underlying Case 25-2278, which the defendant replied to on May 29, 2026 by saying that they had already produced the administrative record. Then Judge Angel Mitchell denied our motion on the next business day, on June 1, 2026, before we replied to Blue Valley’s opposition, before she determined whether the administrative record Blue Valley produced was deficient or not. She just took Blue Valley’s word for it, against our word.
73. On June 3, 2026, we filed motions to recuse in every case of ours that is presided over by Toby Crouse and Angel Mitchell. Almost all the motions were denied on the same day.
74. On June 8, 2026, Blue Valley filed a motion for summary judgment on Case 25-2278 and Case 25-2669, whose underlying administrative records were deficient as they were cherry

picked and supplied by Blue Valley to the court. Especially considering that Blue Valley heavily relies on Angela Gupta's egregious dismissals with prejudice of our first two due process complaints to apply to res judicata to our subsequent complaints, a deficient underlying administrative record that is cherry-picked and supplied by Blue Valley is a clear indication that Blue Valley's motion for summary judgment is predesigned to be rubberstamped and turned into a final judgment in Case 25-2278 and Case 25-2669 by Toby Crouse and Angel Mitchell.

75. Overall, the meeting of the minds among Blue Valley, its lawyers, and judges Toby Crouse and Angel Mitchell involve entering a final judgment against us in Case 25-2778 and Case 25-2669, based on a deficient and biased administrative records supplied by Blue Valley, without conducting any discovery.
76. Then, this final judgment will be used to show that our claims against Blue Valley are frivolous and vexatious, subject to res judicata and statute of limitations, and that we abuse the legal system by suing Blue Valley and its allies/accomplices/proxies. As a result, filing restrictions will be imposed on us, which will preclude us from making claims against Blue Valley in the future.
77. This final judgment will also award Blue Valley the attorney costs it has incurred. Even if we are allowed to appeal and challenge the fee award, Blue Valley, with Toby Crouse's and Angel Mitchell's pre-determined support, be able to enforce the attorney fees award and proceed with its collection efforts immediately.
78. However, since we do not have significant assets to pay Blue Valley's attorney fees, Blue Valley will seize our house and two cars, which are a 2012 Honda Civic and a 2015 Honda Accord. As a result, Blue Valley will have got rid of us for good: we will permanently be forced out of Blue Valley's boundaries and hence we will never be able to make any claims against Blue Valley in the future.

79. The fact that both Blue Valley and Tish Taylor have fought so hard since May, 2024 not to disclose their evaluation data, in and of itself proves our allegations that they manipulated the data.
80. The fact that Blue Valley has fought so hard since May, 2024 to stop us from obtaining the police report on the February 2023 incident, in and of itself proves our allegation that the February 2023 incident was a conspiracy.
81. The fact that Blue Valley has so fought so hard since May, 2024 to disclose its internal emails about us, in and of itself proves our allegation that Blue Valley officials and staff devised schemes to force us out, which amounts to constructive dismissal in employment law.
82. In fact, since the relief Blue Valley is seeking is an award of attorney fees, it is supposed to prove its allegation that we filed due process complaints not in pursuit of truth, justice, and protection of our children, but to harass Blue Valley.
83. For this purpose, Blue Valley itself needs to prove that: February 2023 incident was not a conspiracy and the allegations against our family were substantiated; our children's school evaluations were proper and the underlying data was not manipulated; Tish Taylor's private evaluations of our children were proper and she did not manipulate the underlying data to obtain the results Blue Valley told her to produce; Blue Valley's internal emails clearly show that no school staff or district official schemed to force our family out.
84. Overall, it is not just us who need the police report, evaluation data, and internal emails to prove our allegations. Blue Valley also needs them to prove its allegation that we filed due process complaints for an improper purpose.

**COUNT I: 42 U.S.C. § 1983-CONSPIRACY TO DEPRIVE PLAINTIFFS OF
THEIR RIGHT TO PETITION**

85. We reallege Paragraphs 1 through 84 as if fully set forth herein.

86. There was a meeting of minds by Toby Crouse, Angel Mitchell, Joseph Hatley, Madison Perry, Stephanie Bowman, and Blue Valley USD 229 to deprive us of our right to a fair and swift trial in the following cases: 24-4095; 25-2278; 25-2407, 25-2669; 25-2708; 25-2709; 25-2710; 25-2759.
87. Towards this aim, District Judge Toby Crouse and Magistrate Judge Angel Mitchell went outside their jurisdictions to appoint all the cases we have filed in the District of Kansas to themselves, whether these lawsuits were against Blue Valley or against Blue Valley's allies/accomplices/proxies, such as Department for Children and Families, KSDE officials, Johnson County Mental Health Center, corrupt lawyers including Michael Fleming, Gregory Bentz, Robyn Butler, etc. (see "Exhibit D, E, and F")
88. The aforementioned Defendants acted together to sabotage and stall all our legal proceedings and to unlawfully prevent us from: obtaining the police report on the February 2023 incident; obtaining Blue Valley's internal emails; obtaining our children's school evaluation data; obtaining our children's private evaluation data.
89. As a result of the aforementioned Defendants' conspiracy to impose predetermined and unlawful rulings on us, we have been denied fair legal proceedings, and our cases have been prejudiced. As a result, we could not resolve the issues with our children's education and were forced out of the public school system.
90. As a result, we have suffered extreme emotional distress, incurred legal costs and private school tuition fees, and will continue to suffer such injuries and losses in the future.
91. Although Joseph Hatley, Stephanie Bowman, and Madison Perry are private persons, and Blue Valley may be considered as a private person in a judicial conspiracy case, since all these actors jointly corruptly conspired with judges Toby Crouse and Angel Mitchell, they acted "under color" of law for purposes of § 1983 actions. See *Dennis v. Sparks*, 449 U.S. 24 (1980), *Lugar v. Edmondson Oil Co., Inc.*, 457 U.S. 922 (1982), *Michael Ballard v. Stephanie Wall*, et

al., F.3d 510 (5th Cir. 2005)

92. To put it briefly, the aforementioned Defendants conspired “under color” of state law to deprive us of our right to petition Blue Valley and its aforementioned allies/accomplices/proxies for redress of grievances arising from our children’s education.

COUNT II: NEGLIGENCE (SPENCER FANE, LLP)

93. We reallege Paragraphs 1 through 92 as if fully set forth herein.

94. Spencer Fane has the duty to employ lawyers who comply with the ethical code of conduct for lawyers.

95. Spencer Fane breached this duty by failing to monitor and correct Joseph Hatley’s, Stephanie Bowman’s, as well as Madison Perry’s unethical conduct, which included corruptly conspiring with judges Toby Crouse and Angel Mitchell.

96. As a direct and proximate result of Spencer Fane’s failure to monitor and correct Stephanie Bowman’s and Madison Perry’s unethical conduct, we were denied fair and swift legal proceedings that would have resolved the issues with their children’s education in Blue Valley.

97. As a result, we were forced out of the public school system, had to enroll our children in a private school, have suffered extreme emotional distress, have incurred legal and private school tuition expenses, and will continue to suffer such injuries and losses in the future.

Exhibits:

- Exhibit A: The then KSDE Commissioner Randy Watson talks the board member Michelle Dombrosky into covering up the February 2023 incident for Blue Valley.
- Exhibit B: KSDE Hearing Officer Angela Gupta uses a carrot and stick approach to elicit a motion to dismiss from us, only to dismiss our case with prejudice afterwards.

Then KSDE official Crista Grimwood and everyone else leads us to believe that Gupta's ruling is unappealable.

- Exhibit C: An anatomy of our first three due process complaints.
- Exhibit D: Our sworn statement about the corrupt networks in Kansas, at the heart of which lie Blue Valley and Spencer Fane, LLP.
- Exhibit E: An illustration of the corrupt networks in Kansas, at the heart of which lie Blue Valley and Spencer Fane, LLP.
- Exhibit F: An anatomy of judge assignments and reassignments in our cases.



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Telephone: 912-481-8074
Email: tulusemre@gmail.com



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Email: xiaolei.xu2017@outlook.com

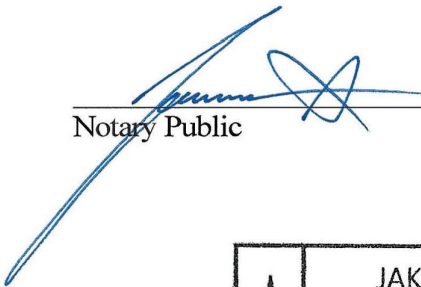
SWORN SIGNATURES

STATE OF Kansas)
) ss:
COUNTY OF Johnson)


Printed Name: Telga Uhusenre

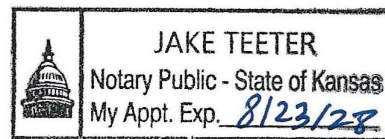

Printed Name: XIAOLEI XU

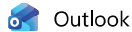
The foregoing were subscribed and sworn to before me this 17th day of
June, 2026.


Notary Public

My commission expires:

8/23/28





Re: Truancy due to violations of student data privacy in Blue Valley School District, Overland Park

From Randy Watson <RWatson@ksde.org>

Date Fri 05/05/2023 05:32

To Michelle Dombrosky <MDombrosky@ksde.org>

EXHIBIT
A

Good morning Michelle,

You have done the right thing by contacting Dr. Merrigan. The issue resides with the Blue Valley school district. If Dr. Ulusemre believes that he son has been discriminated or framed as asserted, she should seek legal counsel against the school district.

The State Board of Education and Department of Education would certainly investigate civil rights disputes and issues around inappropriate behavior on the part of an educator (sexual misconduct for example). We do not have any authority over the issues she raises in her email.

Hope that assists you.

Randy



Dr. Randy Watson

Kansas Commissioner of Education
Office of the Commissioner

(785) 296-3202
rwatson@ksde.org
www.ksde.org

Kansas leads the world in the success of each student.

The Kansas State Department of Education does not discriminate on the basis of race, color, national origin, sex, disability or age in its programs and activities and provides equal access to the Boy Scouts and other designated youth groups. The following person has been designated to handle inquiries regarding the nondiscrimination policies: KSDE General Counsel, Office of General Counsel, KSDE, Landon State Office Building, 900 S.W. Jackson, Suite 102, Topeka, KS 66612, (785) 296-3201.

On May 4, 2023, at 2:57 PM, Michelle Dombrosky <MDombrosky@ksde.org> wrote:

Randy,

I spoke to Dr. Merrigan. Is this something we need to follow up with at the State?

I want to be sure we are doing everything we can to remedy this situation that appears to have further escalated. What further recourse does this parent have?

Michelle

From: Tolga Turk <tturk2023@outlook.com>

Sent: Wednesday, May 3, 2023 8:38 PM

To: Danny Zeck <dzeck@ksde.org>; Melanie Haas <MHaas@ksde.org>; Michelle Dombrosky <MDombrosky@ksde.org>; Deena Horst <dhorst@ksde.org>; Dennis Hersherberger <dherhsberger@ksde.org>; Betty Arnold <BArnold@ksde.org>; Jim Porter <jporter@ksde.org>; Ann Mah <amah@ksde.org>

Subject: Re: Truancy due to violations of student data privacy in Blue Valley School District, Overland Park

Dear Members of the Kansas State Board of Education,

I previously reported you the wrongdoings of some teachers and administrators working at the Blue Valley School District, Overland Park. Briefly, my child was framed for creating an intimidating environment by making death threats at school. The accusations against him are preposterous to anyone who knows him or who knows what is going on at school. Even watching some security camera footage would tell you who is intimidated by whom. Going through my and the school personnel's email communications and other physical evidence, as well as talking to witnesses will reveal the truth to any objective person acting in good faith.

My child has not been able to go to school almost for a month now and has been going through a chronic trauma due to the Blue Valley personnel's several wrongdoings, including violations of student privacy. Could you please let me know who I should contact to reveal the truth and to clear my child's name? Could you please let me know whose duty it is at the Department of Education to investigate the wrongdoings of educators? Please note that the wrongdoings in this case will be public regardless of whether there is an investigation or regardless of the outcome of a potential investigation. I am merely doing my duty to inform you by writing this.

Thank you,
Tolga

From: Tolga Turk

Sent: Monday, April 17, 2023 9:24 PM

To: dzeck@ksde.org <dzeck@ksde.org>; mhaas@ksde.org <mhaas@ksde.org>; mdombrosky@ksde.org <mdombrosky@ksde.org>; dhorst@ksde.org <dhorst@ksde.org>; dherhsberger@ksde.org <dherhsberger@ksde.org>; barnold@ksde.org <barnold@ksde.org>; jporter@ksde.org <jporter@ksde.org>; amah@ksde.org <amah@ksde.org>

Subject: Truancy due to violations of student data privacy in Blue Valley School District, Overland Park

Dear Members of the Kansas State Board of Education,



Tolga Ulusemre <tulusemre@gmail.com>

Re: In re DU and AU: Order Requiring Petitioners To Respond By October 22, 2024

9 messages

Angela Gupta <angela@adrmediate.com>

Fri, Oct 18, 2024 at 10:25 AM

Reply-To: Angela Gupta <angela@adrmediate.com>

To: "Lovett Bowman, Stephanie" <slovettbowman@spencerfane.com>, "dawn@adrmediate.com" <dawn@adrmediate.com>

Cc: "Hillman, Melissa D." <MHillman@bluevalleyk12.org>, "Perry, Madison" <mperry@spencerfane.com>, "Shelby, Jennifer" <jshelby@spencerfane.com>, Tolga Ulusemre <tulusemre@gmail.com>, xu xiaolei <rainxxl@hotmail.com>

Good morning,

Attached is an Order requiring Petitioners to respond by **October 22, 2024**, as to whether they intend to move forward with prosecuting the problems/claims asserted in their initial complaint (Case No. 24DP229-001).

Please note that the failure to timely respond may result in the dismissal of the problems/claims asserted in the initial complaint (Case No. 24DP229-001), with prejudice, without further notice to the parties.

Best regards,

Angela D. Gupta

Due Process Hearing Officer

Associates in Dispute Resolution LLCAssistant: Dawn Dawson | 785.357.1800 | dawn@adrmediate.com

Offices in Kansas City, Missouri and Topeka, Kansas

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----- Original Message -----

From "Lovett Bowman, Stephanie" <slovettbowman@spencerfane.com>To "Angela Gupta" <angela@adrmediate.com>; "dawn@adrmediate.com" <dawn@adrmediate.com>Cc "Hillman, Melissa D." <MHillman@bluevalleyk12.org>; "Perry, Madison" <mperry@spencerfane.com>; "Shelby, Jennifer" <jshelby@spencerfane.com>; "Tolga Ulusemre" <tulusemre@gmail.com>; "xu xiaolei" <rainxxl@hotmail.com>

Date 10/16/2024 11:24:28 AM

Subject In re DU and AU - motion to stay deadlines and for show cause order

Ms. Gupta,

Please find attached the District's Expedited Motion to Stay All Deadlines and for a Show Cause Order. The motion requests a ruling by October 23, 2024.

as

Thank you.

Stephanie Lovett-Bowman Partner
Spencer Fane LLP

1000 Walnut, Suite 1400 | Kansas City, MO 64106
O 816.292.8216 F 816.474.3216
slovettbowman@spencerfane.com | spencerfane.com

 **24.10.18 order re response by Oct. 22.pdf**
128K

Tolga Ulusemre <tulusemre@gmail.com> Mon, Oct 21, 2024 at 11:42 AM
To: Angela Gupta <angela@adrmediate.com>
Cc: "Lovett Bowman, Stephanie" <slovettbowman@spencerfane.com>, "dawn@adrmediate.com" <dawn@adrmediate.com>, "Hillman, Melissa D." <MHillman@bluevalleyk12.org>, "Perry, Madison" <mperry@spencerfane.com>, "Shelby, Jennifer" <jshelby@spencerfane.com>, xu xiaolei <rainxxl@hotmail.com>

Mrs. Gupta,

Please find attached Parents' motion to dismiss.

Regards,
Tolga Ulusemre
[Quoted text hidden]

 **Motion to Dismiss.pdf**
212K

Angela Gupta <angela@adrmediate.com> Tue, Oct 22, 2024 at 9:37 AM
Reply-To: Angela Gupta <angela@adrmediate.com>
To: Tolga Ulusemre <tulusemre@gmail.com>, Crista Grimwood <cgrimwood@ksde.org>
Cc: "Lovett Bowman, Stephanie" <slovettbowman@spencerfane.com>, "dawn@adrmediate.com" <dawn@adrmediate.com>, "Hillman, Melissa D." <MHillman@bluevalleyk12.org>, "Perry, Madison" <mperry@spencerfane.com>, "Shelby, Jennifer" <jshelby@spencerfane.com>, xu xiaolei <rainxxl@hotmail.com>

Good morning,

Attached is an order dismissing the problems/claims asserted in Case No. 24DP229-001.

All deadlines and hearings scheduled in the case are hereby canceled.

Best regards,

Angela D. Gupta

Due Process Hearing Officer

Associates in Dispute Resolution LLC

Assistant: Dawn Dawson | 785.357.1800 | dawn@adrmediate.com

Offices in Kansas City, Missouri and Topeka, Kansas

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----- Original Message -----

From "Tolga Ulusemre" <tulusemre@gmail.com>

To "Angela Gupta" <angela@adrmediate.com>

Cc "Lovett Bowman, Stephanie" <slovettbowman@spencerfane.com>; "dawn@adrmediate.com"

<dawn@adrmediate.com>; "Hillman, Melissa D." <MHillman@bluevalleyk12.org>; "Perry, Madison"

<mperry@spencerfane.com>; "Shelby, Jennifer" <jshelby@spencerfane.com>; "xu xiaolei" <rainxxl@hotmail.com>

Date 10/21/2024 11:42:57 AM

Subject Re: In re DU and AU: Order Requiring Petitioners To Respond By October 22, 2024

[Quoted text hidden]



24.10.22 order of dismissal.pdf

93K

Crista Grimwood <cgrimwood@ksde.org>

Tue, Oct 22, 2024 at 1:55 PM

To: Angela Gupta <angela@adrmediate.com>, Tolga Ulusemre <tulusemre@gmail.com>

Cc: "Lovett Bowman, Stephanie" <slovettbowman@spencerfane.com>, "dawn@adrmediate.com" <dawn@adrmediate.com>,"

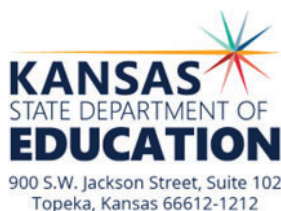
"Hillman, Melissa D." <MHillman@bluevalleyk12.org>, "Perry, Madison" <mperry@spencerfane.com>, "Shelby, Jennifer"

<jshelby@spencerfane.com>, xu xiaolei <rainxxl@hotmail.com>

Hello Ms. Gupta,

This order of dismissal with prejudice has been received and the case file has been updated. If the parties raise any additional issues, another due process will need to be filed. Please let me know if you have any questions.

Best,



Dr. Crista Grimwood, Ed.D

Education Program Consultant:

Dispute Resolution Coordinator

Special Education & Title Services

(785) 296-7262

cgrimwood@ksde.org

www.ksde.org

Kansas leads the world in the success of each student.

EXHIBIT C

	Alleged Violations	Type of IDEA Violation	Timeframe	Proposed Remedy
Complaint #1 (A.U.&D.U.), filed on 05/09/2024	1. Failure to timely evaluate A.U. and D.U.	Procedural: Failure to meet Child Find obligations	Pre-evaluation stage, prior to August, 2023	Compensatory education
	2. Failure to allow for Parents' input into D.U.'s evaluation process	Procedural: Failure to meet procedural evaluation requirements	Evaluation stage, September 2023-February, 2024	- Blue Valley lifts the ban on Tolga Ulusemre - Compensatory education and reimbursements
	3. Deficiencies and errors in the content of D.U.'s evaluation	Substantive: Failure to meet substantive evaluation requirements	Evaluation stage January, 2024-February, 2024	Compensatory education and reimbursements
	4. Failure to stop bullying of A.U. and D.U.	Substantive: Failure to provide a safe environment conducive to learning	August 2022-February 2024 (for D.U.) 2022-2023 school year (for A.U.)	- Public apology by Blue Valley - Blue Valley rescinds all three offenses from D.U.'s disciplinary records - Compensatory education and reimbursements
Complaint #2 (D.U. only), filed on 09/01/2024	1. Declining Parents' repeated requests to hold an IEP meeting for D.U.	Procedural: Failure to meet procedural IEP requirements	Post-evaluation/ IEP stage, August, 2024-September 2024	Blue Valley will allow for an IEP meeting as soon as possible.
	2. Declining Parents' repeated requests to include bullying of D.U. in the IEP meeting's agenda	Procedural: Failure to meet procedural IEP requirements	Post-evaluation/IEP stage, February, 2024-May 2024	- Blue Valley will contract with an independent evaluator to conduct an Independent Educational Evaluation of D.U. - Blue Valley will contract with an independent IEP specialist to help develop D.U.'s IEP.
	3. Domination of the IEP processes by the Assistant Superintendent Mark Schmidt, who is not a member of D.U.'s IEP team	Procedural: Failure to meet procedural IEP requirements	Post-evaluation/IEP stage, May, 2024-September, 2024	
Complaint #3 (D.U. only), filed on 02/28/2025	1. Poisoned well precludes parental participation and results in predetermined IEP outcomes for D.U.	Procedural: Permanent failure to meet procedural IEP requirements	September 2024-Present	Reimbursement for private school tuition
	2. Poisoned well precludes a substantively sufficient IEP for D.U.	Substantive: Permanent failure to meet substantive IEP requirements	October 2024-Present	Reimbursement for private school tuition

**EXHIBIT
D**

KANSAS GENERAL AFFIDAVIT

We, Tolga Ulusemre, and Xiaolei Xu, residing at 13982 W 147th St, Olathe, KS 66062, being of lawful age and sound mind, do hereby make this Affidavit to provide a written statement in lieu of oral testimony.

Statement of Facts

We understand that this Affidavit is made under oath and that any false statements made herein are subject to penalties of perjury. The following facts are true and correct to the best of our knowledge, information, and belief:

1. In February 2023, Blue Valley framed our then 8-year-old for attempting to shoot up the school and our then 10-year-old for trying to make bombs. Then Blue Valley unilaterally and abruptly transferred the two children from Wolf Springs Elementary (“WSE”) to another school amidst publicly humiliating announcements, thereby indicating their guilt to parents and staff members, as well as to the community at large.
2. Simultaneously with that, Blue Valley improperly, unilaterally, and abruptly transferred Xiaolei Xu, who was an instructional support paraprofessional in a general education classroom at WSE, to a self-contained classroom in a middle school, meant for students with severe learning, intellectual, and developmental disabilities, as a special education paraprofessional. Xiaolei Xu quit her job in Blue Valley after that school year.
3. Blue Valley similarly framed Tolga Ulusemre for threatening Blue Valley officials and faculty.

4. The false accusations Blue Valley made against us and our children spread like a wildfire throughout the community, thereby exposing our entire family to bias, bullying, and harassment.
5. Consequently, Blue Valley poisoned the well, turned our family's life upside down, and changed the educational and developmental trajectories of our children. Thus, our family has endured, and is still enduring great pain, suffering, and financial loss.
6. To get our lives and our children's education back on track, we need to clear our names from the false accusations Blue Valley made against us and get reimbursement for our children's private school tuitions. All the lawsuits we have filed in Kansas are towards this aim.
7. The number of lawsuits we have filed and the number of Defendants in these lawsuits is not an indication of our ill-intentions, but of Blue Valley's political clout, which resulted in several allies/accomplices/proxies covering up for Blue Valley's wrongdoings against our family.
8. All the lawsuits we have filed in Kansas stem from three false accusations Blue Valley made against us: our then 8-year-old was going to shoot up the school, our then 10-year-old was trying to make bombs, and Tolga Ulusemre threatened Blue Valley officials and faculty.
9. Thus, all our lawsuits will easily and swiftly fall apart if Blue Valley produces evidence supporting the allegations it has been making against our family.
10. Similarly, all our lawsuits will conclude in our favor if we are allowed to proceed to discovery and prove Blue Valley's lies and wrongdoings. Thus, Blue Valley and its

allies/accomplices/proxies have fought incredibly hard to obtain improper court orders that forestall discovery, such as discovery stay, dismissals, quashing subpoenas, etc., and the same applies to Blue Valley's latest attempt to impose filing restrictions on us, both in the state court and in the federal court.

11. Blue Valley and its allies/accomplices/proxies have managed to forestall discovery in all our existing lawsuits. However, their latest attempt to impose filing restrictions on us, to the best of our understanding, are aimed at preempting the Kansas Open Records Act ("KORA"), the Individuals with Disabilities Education Act ("IDEA"), and the HR retaliation lawsuits that we have the right to file anytime in the future. That is because the KORA, IDEA, and HR retaliation lawsuits we can file in the future can enable us to circumvent the barriers Blue Valley and its allies/accomplices/proxies have erected to prevent us from conducting discovery.
12. For example, one email or a report we obtain through a KORA request or a lawsuit or through an IDEA lawsuit will reveal the truth, and will bring all our lawsuits to an end.
13. Blue Valley reported us to the Department of Children and Families (DCF) for educational neglect, and to the District Attorney's Office for truancy, thereby shifting the blame for D.U.'s school avoidance onto us.
14. The District Attorney's Office sued us for truancy, without ever investigating nor even inquiring about why D.U. did not go to school, although we provided them with ample information and evidence explaining why.
15. The truancy judge Jennifer Ashford threatened to take away D.U. from us if we did not

obtain out-of-pocket mental evaluations of ourselves. Judge Jennifer Ashford also ordered us to sign release of information forms with the Guardian Ad Litem, Dennis Stanchik, prior to the evaluations, so that Dennis Stanchik could contact the evaluator and fish for the results Jennifer Ashford wanted.

16. Johnson County Mental Health Center abruptly ceased following the plan they had for D.U., withdrew their support from D.U., refrained from going to D.U.'s school to avoid witnessing the treatment he received at school, and allowed Blue Valley to force him out of school.
17. DCF turned a blind eye to everything Blue Valley had been doing to our children, and instead investigated us. The DCF investigator Michelle Merritt went to our children's schools, but not to see the treatment they were receiving at school, to interrogate them so that she could dig up dirt on us.
18. Michelle Merritt pushed us to obtain the out-of-pocket mental evaluations Judge Jennifer Ashford wanted, indicating that she was totally informed about the schemes taking place in our truancy proceedings.
19. The push for mental evaluations, truancy charges, as well as the educational neglect investigation against us all stopped, when we unenrolled D.U. from Blue Valley. Therefore, all these schemes were part of the broader scheme that was aimed at forcing D.U. out of Blue Valley.
20. On September 9, 2024, in our first ever court hearing in the Johnson County District Court, Judge Rhonda Mason treated us with great contempt, and had a law enforcement officer present in the courtroom. Rhonda Mason acted as if we were

belligerent, dangerous parents filing frivolous, vexatious lawsuits, where we should have instead accepted the consequences of having a child who attempted to shoot up the school, although it was impossible to reach such a conclusion from the pleadings.

21. Judge Toby Crouse manifested similar assumptions in a hearing held on June 2, 2025, when he referred to the so-called “sordid” relationship Tolga Ulusemre had with Blue Valley, although it was impossible to reach that conclusion from the pleadings. Besides, Judge Toby Crouse did not even know the basic facts stated in the pleadings. E.g., he did not even know who the defendant Joann Woltman was, and did not know that Blue Valley was improperly representing her, a judge parent, in a way that supported our allegations regarding a conspiracy between Joann Woltman and Blue Valley targeting our family.
22. The Review Officer Matthew Spurgin, who was assigned to review our due process complaint, manifested similar assumptions in his ruling on by stating that “D.U. and his family have an extended history of conflict with USD229.”, although it was impossible to reach such a conclusion from the records available to him.
23. The staff of the Attorney General’s Office manifested similar assumptions, on multiple occasions, when they mocked and ridiculed Tolga Ulusemre for reporting the student privacy violation, criminal false communication and the hoax Blue Valley committed after it publicly made false accusations against his son, although it was impossible for the Attorney General’s Office to reach that judgment from the evidence and information Tolga Ulusemre provided.
24. Judge Rhonda Mason and the Johnson County District Court unlawfully sabotaged our

subpoenas to prevent us from exposing Blue Valley's wrongdoings.

25. Overall, we reach the conclusion that all the aforementioned members of the legal community in Kansas were given the same tips, probably by the same person, who is an insider, i.e., a reputable member of the legal community in Kansas, whose words are treated as "inside information", or invaluable intelligence, whose mere words carry way more weight than the information and evidence we provide.
26. In a lawsuit filed by a parent against Blue Valley, Spencer Fane was able to get a federal judge to improperly order an 8-year-old sexual harassment victim to be deposed by them regarding a sexual harassment incident that happened two years ago when she was a kindergartener. This deposition was obviously aimed at impeaching and tormenting the victim and her parents, thereby coercing the parents into giving up.
27. Such rulings signal to the legal community Spencer Fane's undue influence over decisionmakers, thereby deterring lawyers from taking on Blue Valley and Spencer Fane. In line with that, we have witnessed over the years how bringing up the name of Blue Valley alone is enough to discourage lawyers from taking our cases.
28. Since we have been similarly observing in our litigations for years the emphasis Spencer Fane has been putting on obtaining undue influence over judges and ALJs, and since we know that Joseph Hatley from Spencer Fane has been talking to the Attorney General's Office about us and about our cases, we believe that Joseph Hatley in particular, and Spencer Fane in general, have been exercising undue influence over the members of the legal community in Kansas to obtain rulings and decisions in favor of their clients, including Blue Valley.

29. In that sense, Spencer Fane is in the center of a nefarious, elite network that rules Kansas, and hence can be compared to Jeffrey Epstein in that regard. If Spencer Fane is the Jeffrey Epstein of Kansas, then Joseph Hatley is the Ghislaine Maxwell of Kansas.
30. Blue Valley and Spencer Fane are similar to organizations such as Enron and Arthur Andersen, and hence are likely to share a similar fate to them.

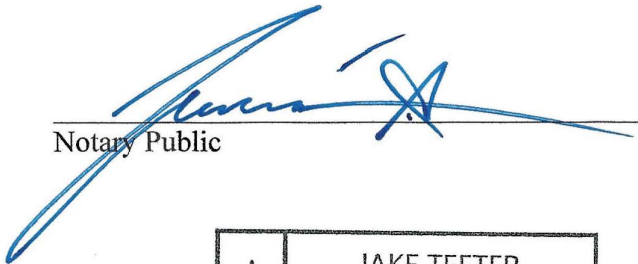
SWORN SIGNATURES

STATE OF Kansas)
) ss:
COUNTY OF Johnson)


Printed Name: Tolga Ulusemre

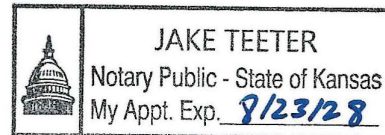
Xiaolei Xu
Printed Name: Xiaolei Xu

The foregoing were subscribed and sworn to before me this 22nd day of
December, 2025.


Notary Public

My commission expires:

8/23/28



**EXHIBIT
E**

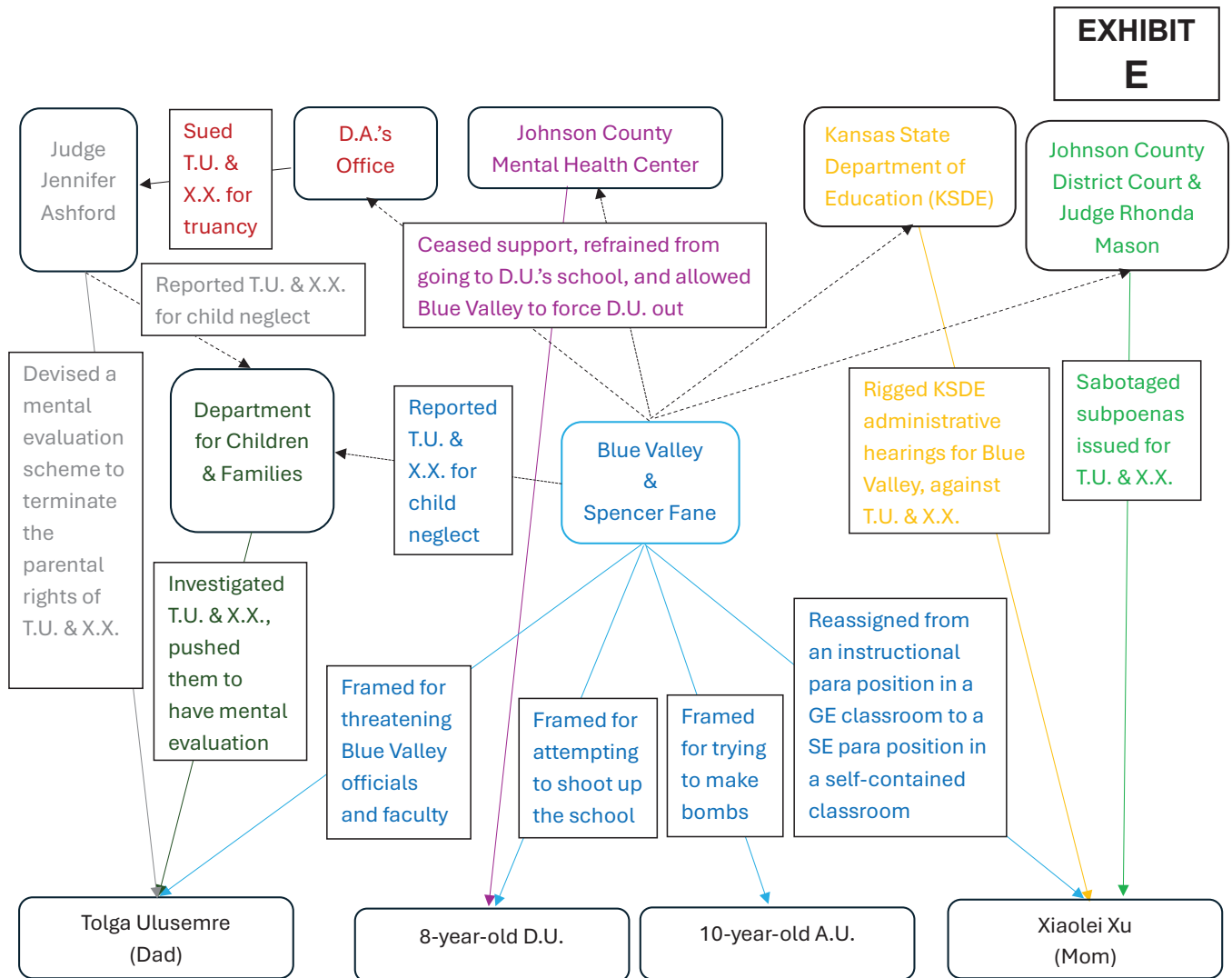


EXHIBIT F

Judge assignments and Reassignments in Plaintiffs' Cases

Case No.	Claim Made	Date of Filing	Date of Judge Reassignment	Judge Reassignments	Status of the Case
24-4095	Section 1983 against Blue Valley	10/03/2024	05/21/2025	From Teresa James to Angel Mitchell	Stay discovery pending fully-briefed motions to dismiss
25-2278	Appeal From KSDE Complaint #3 (DU)	05/22/2025	05/29/2025-05/30/2025	From Holly Teeter and Teresa James to Toby Crouse and Angel Mitchell	Stayed discovery till 02/26/2026
25-2407	Section 1985 against Spencer Fane and other lawyers who conspire with decisionmakers	07/25/2025	07/28/2025	From Holly Teeter and Teresa James to Toby Crouse and Angel Mitchell	Stay discovery pending fully-briefed motions to dismiss
25-2669	Appeal from KSDE Complaint #4 (AU)	11/17/2025	11/19/2025	From Teresa James to Angel Mitchell	Stayed discovery till 02/26/2026
25-2708	Section 1983 against Johnson County Court	11/30/2025	12/05/2025	From Eric Melgren to Toby Crouse	Stay discovery pending fully-briefed motions to dismiss
25-2709	Section 1983 against Johnson County Mental Health Center	11/30/2025	12/04/2025	From Daniel Crabtree to Toby Crouse	Stay discovery pending fully-briefed motions to dismiss
25-2710	Section 1983 against KSDE	11/30/2025	12/03/2025	From Holly Teeter to Toby Crouse	Stay discovery pending fully-briefed motions to dismiss
25-2759	Section 1983 against DCF	12/22/2025	12/22/2025	From John Broomes to Toby Crouse	Scheduling conference to be held on 06/25/2026