

<p>DISTRICT COURT, LARIMER COUNTY, COLORADO Larimer County Justice Center 201 Laporte Avenue, Suite 100 Fort Collins, CO 80521-2761 (970) 498-6100</p>	<p>DATE FILED: May 26, 2020 3:35 PM FILING ID: 7DA2BDCAE6892 CASE NUMBER: 2020CV116</p> <p style="text-align: center;">COURT USE ONLY</p>
<p>Plaintiff: STACY LYNNE</p> <p>v.</p> <p>Defendants: CITY OF FORT COLLINS: City Manager City Attorney Carrie Daggett, Rachel Askeland (Acting Records Custodian), Karen Burke (Records Custodian)</p>	<p>Case Number: 2020 CV 116</p> <p>Courtroom: 3C</p>
<p>DEFENDANTS' WITNESS LIST</p>	

COMES NOW, the Defendants, the City of Fort Collins, Carrie Daggett, Rachel Askeland and Karen Burke, by and through counsel, and respectfully submit the following Witness List for the hearing set for June 8, 2020 at 9:00 a.m.:

1. **Karen Burke**, Director of Human Resources for the City of Fort Collins.

Ms. Burke will testify on behalf of the City of Fort Collins as custodian of the records at issue. She will testify as to the contents of employee personnel files, and that she considers the Quarterly Performance Assessments (QPA) to be part of the personnel file. She will further explain why this City uses QPAs in their ongoing employee assessments. She will discuss all policies regarding QPAs, directions for the use of QPAs to managers and employees, and explain how employees prepare the QPAs. She will also testify as to all documents produced in the

City's response to Plaintiff's original records request and the reasons for objecting to production of the QPAs.

2. **Noah Beals**, Senior Planner, City of Fort Collins Development Review Department

Mr. Beals will testify as to his understanding of the purpose of the QPAs and to his expectation that they are confidential.

3. Defendants reserve the right to elicit testimony from any of the witness identified and called by Plaintiff.

Respectfully submitted this 26th day of May, 2020.

WICK & TRAUTWEIN, LLC

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CERTIFICATE OF ELECTRONIC FILING

The undersigned hereby certifies that a true and correct copy of the foregoing **DEFENDANTS' WITNESS LIST** was filed via the Colorado Courts E-Filing System and served this 26th day of May, 2020, on the following:

Stacy Lynne
305 West Magnolia Street #282
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Served via email to stacy_lynne@comcast.net & U.S. Mail.

s/ Jody L. Minch

[The original certificate of electronic filing signed by Jody L. Minch is on file at Wick & Trautwein, LLC)