

BEFORE THE GOVERNING BOARD OF THE
GLENDALE UNIFIED SCHOOL DISTRICT
STATE OF CALIFORNIA

In the Matter of the Employment Status of:

Teachers of the Glendale Unified School
District,

Respondents.

OAH No. 2010030985

PROPOSED DECISION

Ralph B. Dash, Administrative Law Judge with the Office of Administrative Hearings, heard this matter on April 22 and 23, 2010, at Glendale, California.

Howard A. Friedman, Attorney at Law, represented Glendale Unified School District (District).

Emma Leheny, Attorney at Law, represented the 89 Respondents named in Exhibit A attached hereto and made a part hereof.

Thomas Allen represented Respondent Cristina Allen.

There was no appearance by or on behalf of three of the 93 Respondents named on Exhibit B, attached hereto and made a part hereof, and the matter proceeded by way of default hearing as to them.

Oral and documentary evidence having been received and the matter submitted, the Administrative Law Judge makes the following Finding of Facts.

1. Michael Escalante, Ed. D., Superintendent of the District, acting in his official capacity, caused all pleadings, notices and other papers to be filed and served upon Respondents named in Exhibit B pursuant to the provisions of Education Code Sections 44949 and 44955. All pre-hearing jurisdictional requirements have been met with respect to the District and the Respondents named in Exhibit B.

2. On March 2, 2010, the District's Governing Board adopted a Resolution to reduce and discontinue the services of 112 full-time equivalent (FTE) certificated positions in Elementary K through 6th grade, excluding positions in the Foreign Language Academies of Glendale (FLAG), for the 2010/2011 school year

3. These services are “particular kinds of services” that may be reduced or discontinued within the meaning of Education Code section 44955. The Board’s decision to reduce or discontinue these particular kinds of services was not arbitrary or capricious, but constituted a proper exercise of discretion.

4. The reduction or discontinuation of these particular kinds of services related to the welfare of the District and its pupils. The reduction or discontinuation of particular kinds of services was necessary to decrease the number of certificated employees of the District as determined by the Board.

5. The Board properly considered all known attrition, resignations, retirements, deaths and requests for transfer in determining the actual number of necessary layoff notices to be delivered to its employees as of March 15, 2010. (*San Jose Teachers Association v. Allen* (1983) 144 Cal.App.3d 627 at 636 (1983)).¹

6. The District created a seniority list (Exhibit 3) naming all probationary and permanent teachers in order of each one’s first date of paid service. Respondents are certificated District employees. The Board specifically excluded from layoff the teachers in the FLAG program; however, all 17 teachers in the FLAG program were given “precautionary” layoff notices. The FLAG program is a researched-based, highly-regarded, dual-immersion program which requires that students in grades kindergarten through second grade receive instruction in the “target” language for 90 percent of the school day. As students move to upper level grades in the FLAG program, the amount of instruction in the target language is reduced by 10 percent each year until it reaches 50 percent where it remains. The goal of the program is to teach students to be completely proficient in English and the target language. The exception to this FLAG model is the FLAG Armenian heritage class, taught in English only, but which include after-school instruction in the Armenian language and culture. Currently, the FLAG program offers classes in Spanish, Italian, German and Korean, with plans to add Japanese.

7. The design of the FLAG program necessitates that all teachers in the program be native speakers or near-native speakers. Simply having a working knowledge of a language or BCLAD certification does not qualify a teacher to teach in the program. The teacher must be able to read, write and speak the target language fluently enough to be able to translate the English language curriculum, answer student questions, and generally teach as though the entirety of the class was being conducted in the target language. If a teacher is a non-native level speaker and has mistakes in his or her pronunciation or dialect, a student may adopt the mistakes and repeat them mistakes himself. Further, as Andrea Reuter, a FLAG teacher and a witness called by the attorney for Respondents even noted, teachers in the FLAG program must be able to think on their feet and know answers immediately. They cannot take the time to look up a particular word or phrase that they may not know.

¹ All layoffs were for particular kinds of service, and not “average daily attendance” which might have required positively assured attrition to be considered through May 15, 2010.

Individuals who merely have a working knowledge of a language do not have this ability. Moreover, FLAG teachers are faced with the additional challenge of developing lesson plans and coursework in two languages, working beyond traditional hours, and arranging additional parent-teacher meetings beyond what is typically arranged by teachers in traditional classrooms.

8. As a result of the challenges and difficulties associated with teaching in the FLAG program, the District has developed a distinct and very competitive selection process for teachers wishing to teach in the program. (See Exhibit 11, *Interview Process for FLAG Programs and Accompanying Interview Paperwork*.) The first step in the interview process includes a paper screening where the District looks for, among a number of qualities, experience teaching in a dual-immersion program and evidence that the individual is a native or near-native speaker, reader and writer in the target language. During the second step, the District conducts a telephone interview in English and the target language in an effort to verify the proficiency of the individual's language skills. (*Ibid.*) The third step of the interview process includes an oral and written interview before a panel that includes a principal, a native speaker of the target language and, in some instances, parents of children already in the program. (*Ibid.*) The fourth and final step requires prospective teachers to prepare a demonstration lesson in the target language to students currently in the program or to the panel if the program in the target language has not formally been established. (*Ibid.*) Only one Respondent (Jessica Zavala) testified that she qualified to teach in Spanish in the FLAG program. However, she admitted that she does not speak the language perfectly, and her fluency comes from speaking with her parents. She did not indicate that she could properly translate the English curriculum into Spanish.

9. School districts have broad discretion in defining positions within the district and establishing requirements for employment. (*Martin v. Kentfield School Dist.* (1983) 35 Cal.3d 294, 299-300.) Similarly, school districts have the discretion to determine particular kinds of services that will be eliminated, “even though a service continues to be performed or provided in a different manner by the district.” (*Gallup v. Board of Trustees* (1996) 41 Cal.App.4th 1571, 1582-1585; *Hildebrandt v. St. Helena Unified School Dist.* (2009) 172 Cal.App.4th 334, 343.)

10. What amounts to a particular kind of service for lay-off purposes varies according to the circumstances, and must in each case be determined in the light of the particular facts. A particular kind of service may be a certain subject, it may be the teaching of the subject for a particular purpose, or it may be a particular manner of teaching the subject. (*Walsh v. Board of Trustees of Redlands High School Dist.*, (1934) 2 Cal. App. 2d 180, *Fuller v. Berkeley School Dist. of Alameda County*, (1934) 2 Cal.2d 152; *Gallup v. Board of Trustees*, (1996) 41 Cal. App. 4th 1571.) *CTA vs. Goleta Union School District* (1982) 132 Cal.App.3d 32, holds that elementary teaching is a distinct particular kind of service. In *Gallup*, the court specifically noted that the issue is not *who* will perform the services, but *how* the services will be performed. (*Gallup, supra* at 1588.) It follows that teaching the elementary curriculum in a dual-language immersion program such as FLAG is

a distinct service taught in a particular manner, and thus the District acted within its discretion in exempting from layoff the 17 FLAG program teachers.

11. Similarly, the evidence established the unique nature of the AdvancePath Lead Teacher position and the Teacher Specialists whose junior incumbents were retained over teachers with more seniority. AdvancePath is run jointly by the District and AdvancePath Academics, Inc., a private company that works in conjunction with school districts across the country to offer programs to at-risk students. The program is designed to assist students who have dropped out of school to complete their education. In addition to the skills of a traditional teacher, the lead AdvancePath teacher for a school district must have managerial skills, experience running an office, extensive experience working with at-risk students and a willingness to work evenings and weekends. (See Exhibit 10, Announcement of Certificated Position – Lead Teacher AdvancePath Academy, and Overview of AdvancePath Training Phases.) The lead AdvancePath teacher is also required to undergo a ten-day-long intensive training funded by AdvancePath, and is required to attend ongoing training throughout the school year. (*Ibid.*) The lead AdvancePath teacher must have the ability to develop strong relationships with at-risk students and must be able to communicate effectively with the parents of such students. In an effort to ensure that the lead teacher possesses the necessary qualities, the District conducts a separate hiring process to fill the position, which includes an interview process conducted jointly by AdvancePath and the District. The teacher currently employed in the position has extensive experience working with at-risk youth, has already undergone the necessary training, and possesses all the capabilities and qualities the AdvancePath company believes are necessary for the position.

12. Individuals employed as Teacher Specialists must also possess qualities above and beyond what is expected of a traditional classroom teacher. The District has approximately 25-30 different individuals working as Teacher Specialists in a number of areas including the FLAG program, special education and English language learner programs. The District does not move traditional classroom teachers in and out of these types of positions, but rather conducts a separate interview process to fill each such position. (See Exhibit 12, *Sample Announcements for Certificated Position – Teacher Specialists.*) Requirements vary depending on the specific placement, but in addition to a minimum of three to five years of classroom experience, teacher specialists must have strong interpersonal skills, the ability to directly support administrators, technical knowledge including advanced computer and data system skills and preferably a master's degree. (*Id.*) Similar to the FLAG and AdvancePath programs, individuals seeking such positions must participate in separate and rigorous interview process before they may be given such a position. Accordingly, all three types of positions, FLAG, AdvancePath and Teacher Specialist, constitute particular kinds of service separate from services provided by traditional multi-subject credentialed Respondents

13. Even if the FLAG, AdvancePath and Teacher Specialists positions were considered to be the same kinds of services rendered by other elementary school teachers, “skipping” allows deviation from strict seniority when the “district demonstrates a specific need for personnel to teach a specific course or course of study . . . and that the certificated

employee has special training and experience necessary to teach that course or course of study or to provide those services, which others with more seniority do not possess.” (Ed. Code § 44955, subd. (d)(1).) In other words, for purposes of a school district's reduction in force, skipping refers to a junior teacher being retained for specified reasons. (*Bledsoe v. Biggs Unified School* (2008) 170 Cal.App.4th 127, 131, fn. 3, citing *Alexander v. Delano Joint Union High Sch. Dist.* (1983) 139 Cal.App.3d 567.)

14. In order to justify skipping a junior employee in a reduction in force, a District must demonstrate a specific need for personnel with special training and experience to teach a specific course of study or to provide certain services. (Ed. Code § 44955, subd. (d).) The District demonstrated at hearing that this special need exists and further established that, based on these needs, it has determined that no senior employee possesses the qualifications which would entitle him or her to be assigned to the position of FLAG teacher, AdvancePath Lead Teacher or Teacher Specialist).

15. Appellate court decisions in the layoff context have held that where competency is not demonstrated by a senior employee, a junior employee having the ability to serve the needs of a program may be retained by the school district even though it may result in the senior employee's termination. (*Brough v. El Segundo Unified Sch. Dist.* (1981) 118 Cal.App.3d 702, citing *Moreland Teachers Ass'n v. Kurze* (1980) 109 Cal.App.3d 648, 655.) Courts have reasoned that the law requires “that someone make informed determinations whether a laid-off employee . . . is both 'certificated and competent,’” and that “these determinations necessarily involve ‘discretionary decisions’ by a school district's responsible officials because they ‘have a special competence’ to make them.” (*King v. Berkeley Unified Sch. Dist.*, (1979) 89 Cal.App.3d 1016, 1023; *Duax v. Kern Community College Dist.*, (1987) 196 Cal.App.3d 555, 565). In making this determination, a school district must consider not only legal qualifications (i.e., whether a teacher is appropriately credentialed) but also actual competence, or “the correlation between the applicant's specific training and experience and the duties of the available position.” (*King, supra*, 89 Cal.App.3d at 1019.)

16. In *Bledsoe v. Biggs Unified School, supra*, 170 Cal.App.4th at 131, a senior English and social science teacher challenged the retention of two junior teachers teaching in a community day school, stating that the junior teachers were improperly skipped because the senior teacher was certificated and competent to render the services they were providing. The teacher argued that only formal, written program requirements are relevant in determining the District's needs and the teacher's competence to fill these needs. (*Id.* at 138.) The court rejected the teacher's argument, finding instead that subdivision (d)(1) of section 44955 “expressly allows a district to demonstrate its specific ‘needs’ and there is nothing in the statute that requires such needs to be evidenced by formal, written policies, course or job descriptions, or program requirements.” (*Ibid.*) The court went on to specifically find that while the teacher may have the base qualifications necessary to be certificated and competent because she held the appropriate credential to teach in the community day school, “subdivision (d)(1) recognizes a district may have specific needs for personnel to teach a specific course of study that go beyond base qualifications.” (*Ibid.*)

17. In *Bledsoe*, the superintendent testified that the community day school served a distinct and difficult student population, requiring teachers to possess a specialized background, training, and experience. (170 Cal.App.4th at 138.) The court found that this evidence sufficiently established a specific need by the district for such teachers. (*Ibid.*) Here, the District provided evidence that 21 individuals (17 FLAG, one AdvancePath and three Teacher Specialists) should be skipped and their lay-off notices rescinded. The District has established both that the three programs are each a distinct kind of service and that the 21 incumbents may properly be skipped in determining the order of layoff.

18. Evidence was presented that the seniority date of some of the Respondents, as reflected in Exhibit 3, should be revised. The claim of each Respondent was thoroughly examined. Except for the three teachers discussed below, it is found that Respondents presented insufficient evidence from which it may be concluded the District erred in its preparation of the seniority list.²

19. Education Code § 44848 states that if an employee resigns and is thereafter reemployed, the “date of employment shall be deemed to be the date on which [she] first accepted reemployment . . . or rendered paid service . . . after [her] reemployment.” (See also *San Jose Teachers Ass’n v. Allen*, 144 Cal. App. 3d 627 (1983). Kathy Wong, a permanent employee, took a leave of absence from the District effective at the end of the 2001-2002 school year. When Wong returned to the classroom in the fall of 2005, the District erroneously denied her permanent status and had her sign a temporary contract for the 2005-06 school year.

20. Under Education Code § 44931, teachers who are permanent upon their resignation have the right of re-hire for 39 months and will be restored to all the rights and benefits of a permanent employee upon return. Wong returned to the classroom within this 39-month time limit. The District violated this section by instead categorizing Wong as “temporary” without justification for doing so. Wong's seniority date should be corrected to remedy this District error.

21. The District cannot prevail by arguing that Wong returned to less than a full-time position in 2005. The fact that her position was only a 50 percent share is irrelevant to her classification. There is “nothing in the statute[] indicat[ing] the legislature intended that permanent status should be denied” in the situation of a job-share teacher working half-weeks rather than half-days, where the teacher would have earned permanent status upon re-

² In this regard, it should be noted the District’s contention that Respondents are barred under the doctrine of laches from asserting a different seniority date has no merit. It is the District’s duty and responsibility to maintain adequate and accurate records for purposes of determining seniority. Under Evidence Code section 664, the District is presumed to have regularly performed its official duties. If it has failed to maintain records to support the seniority dates given (as it seems to be doing by stating that Respondents unduly delayed making seniority claims and the District no longer has the appropriate documentation or “institutional memory” to refute it), then it has not regularly performed its duty. However, Respondents did not offer sufficient evidence to overcome the presumption, so the District was not “put to the test” of showing how any alleged delay affected their ability to rebut evidence.

structuring the work schedule. (*Vittal v. Long Beach Unified School District* (1970) 8 Cal. App. 3d 112, 119-120.) Therefore, although Wong returned to a less than full-time position, she should rightly have been categorized as permanent upon her return to the classroom. The seniority list should be amended to reflect her correct seniority date of October 3, 2005.

22. Elementary teacher Unis Ko-Choi was given a seniority date of September 7, 2004. However, at hearing she produced documentation, in the form of an “Administrative Summary Evaluation” dated April 26, 2002, in which her status was listed as “P-1,” first year probationary teacher. She began teaching for the District at the start of the 2001-2002 school year (the specific date was not established by the evidence), and her seniority date must be corrected to reflect that starting date.

23. Elementary teacher Renee Rivera was given a seniority date of September 13, 2005. This date was assigned because the District did not receive Rivera’s credential until the late afternoon of September 12, 2005. However, the evidence was clear that Rivera’s credential was valid when she began teaching at the start of that school year, September 1, 2005, and her seniority date must be revised accordingly.

24. Testimony and offers of proof by and on behalf of many teachers established that each had attended a mandatory two-day training program prior to their respective start dates, and each wanted their seniority date adjusted to account for those two days. However, the evidence was that the teachers were not paid, nor did they receive a stipend of any kind, for that training. Under Education Code section 44845, seniority starts to accrue from the first date of paid service in a probationary capacity.

25. Testimony and offers of proof were made on behalf of several teachers that they had signed “serial temporary contracts to fill vacant positions” or had provided service for at least 75 percent of the preceding school year, and their seniority dates should be revised to reflect their first date of paid service to the first date of employment in a temporary capacity or substitute capacity. There is no need to delve into the law on this subject. The testimony and offers of proof were, in each case, unsubstantiated and insufficient to establish that the seniority dates should be changed.

Conclusions of Law

1. Jurisdiction for these proceedings exists pursuant to Education Code Sections 44949 and 44955.

2. The services set forth in Finding 2 are particular kinds of service which may be reduced or discontinued in accordance with applicable statutes and case law. A district may reduce services, within the meaning of Education Code Section 44955, subdivision (b), “either by determining that a certain type of service to students shall not, thereafter, be performed at all by anyone, or it may ‘reduce services’ by determining that proffered services shall be reduced in extent because fewer employees are made available to deal with the pupils involved.” (*Rutherford v. Board of Trustees* (1976) 64 Cal.App.3d 167, 178-179.)

3. Cause exists because of the reduction in particular kinds of services to reduce the District's teaching positions by 112 FTEs and to give notice to the affected teachers pursuant to Education Code section 44955. (*Campbell v. Abbot* (1978) 76 Cal.App.3d 796; *Degener v. Governing Board* (1977) 67 Cal.App.3d 689).

4. The District's decision to reduce or discontinue the services is neither arbitrary nor capricious, but rather a proper exercise of the District's discretion.

5. No junior certificated employee is scheduled to be retained to perform services which a more senior employee is certificated and competent to render.

6. Junior teachers may be given retention priority over senior teachers if the junior teachers possess superior skills or capabilities which their more senior counterparts lack. (*Poppers v. Tamalpais Union High School District* (1986) 184 Cal.App.3d 399; *Santa Clara Federation of Teachers v. Governing Board* (1981) 116 Cal.App.3d 831.) As set forth in Findings 6 through 12, all 21 incumbents in the FLAG, AdvancePath and Teacher Specialist positions have such superior skills or capabilities. Although precautionary layoff notices were given to them, the District need not send them final layoff notices.

ORDER

1. As a result of the reductions of services, the District may give notice to all teachers listed on Exhibit B that their services will not be required for the 2010/2011 school year; provided, however, the District need not send such notice to incumbents in the FLAG, AdvancePath and Teacher Specialist programs.

2. The District shall amend its seniority list: as to Kathy Wong, by providing her with a seniority date of October 3, 2005; as to Unis Ko-Choi, by providing her with a seniority date as of the first day of the 2001-2002 school year; and, as to Renee Rivera, by providing her with a seniority date of September 1, 2005.

Dated: _____

RALPH B. DASH
Administrative Law Judge
Office of Administrative Hearings

EXHIBIT A (page 1 of 3)

AMSES ROBERT
ANDERSON PATRICIA ELISABETH
ARNTSON JENNIFER DENELLE
AROYAN CHRISTINE A
BEDOE PATRICIA A
BELL CHRISTINA M
BENDER KYLE W
BRIGHT APRIL
CARBAJAL LAURA
CHAI CAROLINE C
CHO EUN-JUNG CHRISTINE
CHOBANYAN HASMIK
CHOI JUNE
CHOI UNIS SU YOUNG
CHUI DEREK H
DAINES ERIC N
DALTON MATTHEW DENNIS
DE BRUIJN RENS PAUL
DE LA GARZA BRAD MICHAEL
DE LUNA VIOLET ANN MARIE
DEMBEKJIAN NICOLE
DIMUNDO DANIEL BRYAN
DOMBROSKI STEFANI
EGUIZARIAN AIDA
ELEFThERIADOU MARY
FLETCHER EVE M
GARAY KELLY DENICE
GARCIA VIVIAN
GARRUBBA JENNIFER P.
GARZA NANCY
GASPARIANNOONEH
GHARABIGHI AYLIN
GOLSTANYAN RIMA
HAKOPIAN NARINEH
HAMEL CHERYL L
HANSEN BRINGAS KARLA JEAN
HERNANDEZ PEARL CARMEN
HUDSON SARA W
HUGHES KIMBERLY DAWN
HWANG KYLIE SEOLHWA
ISKANDARYAN ARMINE
ITO SHANNON JO ANN TOMIKO

EXHIBIT A (page 2 of 3)

KAPRIELIAN	LISABETH
KESHISHIAN	MELISSA BEE
LAST NAME	FIRST NAME
KIM	DARAE JAYNA
KIM	CINDY SHIN YOUNG
KUGEL	PATRICIA A
KURCHIAN	HERMINE G
LAING	DOUGLAS A
LANDEROS	CYNTHIA P
LOHUARU	SUSAN DENICE
LUNAMARIANA	PATRICIA
MACK	SHANNON W
MARKARIAN	ADRINEH
MARSTON	MEGAN C
MATEVOSIAN	ARPINE
MC FARLANE	LAURIE RENEE
MCREYNOLDS	REBECCA LYNN
MORELL	CHRISTINE LYNN
OFARRILL	DIANEH
PARDO	KRISTIN DAWN
PATTON	TARA LORYNN
PRADO	IRACEMA
QUINONEZ	YVONNE OPAL
REUTER	ANDREA
RIVERA	RENEE DIANE
ROBERTSON	LYNDE ANN
RODRIGUEZ	SONYA ELIZABETH
SCHILLING	LESLIE ANNE
SHIN	AH REUM
SPARKS	ASHLEY
STOKES	DIANE MATHIS
TAHKJEE	HYE
TAPIA	ZULEMA R
TISCARENO	ARACELI
VEHUNI	ALINA
VERCRUSE	JETTREY JEROME
WEST	JENNIFER ELAINE
WIDHOLM	CAROLYN GRACE
WILLEMS	GARY R
WILLIAMS	TERESA EB
WINANS	JENNIFER LYNN

WISINSKI ROBYN WESSLER

EXHIBIT A (page 3 of 3)

WONG KATHY K.
WOOLDRIDGE BOBBI SUE
WORSTER WHITNEY C
YOUNG PEGGY
YOUSEFI ADRINEH
ZAVALA JESSICA

EXHIBIT B (page 1 of 3)

1. Melissa Rubin Adams
2. Cristina Lianne Allen
3. Robert Amses
4. Patricia Elisabeth Anderson
5. Jennifer Denelle Arntson
6. Christine A. Aroyan
7. Patricia A. Bedoe
8. Christina M. Bell
9. Kyle W. Bender
10. April Bright
11. Laura Carbajal
12. Caroline C. Chai
13. Eun-Jung Christine Cho
14. Hasmik Chobanyan
15. June Choi
16. Unis Su Young Choi
17. Derek H. Chui
18. Eric N. Daines
19. Matthew Dennis Dalton
20. Quyen Le Dau
21. Rens Paul De Bruijn
22. Brad Michael De La Garza
23. Violet Ann Marie De Luna
24. Nicole Dembekjian
25. Daniel Bryan DiMundo
26. Stefani Dombroski
27. Aida Eguizarian
28. Mary Eleftheriadou
29. Lena M. Fischer
30. Eve M. Fletcher
31. Kelly Denice Garay
32. Vivian Garcia
33. Jennifer P. Garrubba
34. Nancy Garza
35. Nooneh Gasparian
36. Aylin Gharabighi
37. Rima Golstanyan
38. Narineh Hakopian
39. Cheryl L. Hamel
40. Karla Jean Hansen Bringas
41. Pearl Carmen Hernandez
42. Sara W. Hudson

EXHIBIT B (page 2 of 3)

43. Kimberly Dawn Hughes
44. Kylie Seolhwa Hwang
45. Armine Iskandaryan
46. Shannon Jo Ann Ito
47. Lisabeth Kaprielian
48. Melissa Bee Keshishian
49. Darae Jayna Kim
50. Cindy Shin Young Kim
51. Patricia A. Kugel
52. Hermine G. Kurchian
53. Douglas A. Laing
54. Cynthia P. Landeros
55. Susan Denice Lohuaru
56. Mariana Patricia Luna
57. Shannon W. Mack
58. Adrieneh Markarian
59. Megan C. Marston
60. Arpine Matevosian
61. Laurie Renee McFarlane
62. Rebecca Lynn McReynolds
63. Christine Lynn Morell
64. Dianeh OFarrill
65. Kristine Dawn Pardo
66. Tara Lorynn Patton
67. Iracema Prado
68. Yvonne Opal Quinonez
69. Andrea Reuter
70. Renee Diane Rivera
71. Lynde Ann Robertson
72. Sonya Elizabeth Rodriguez
73. Leslie Anne Schilling
74. Ah Reum Shin
75. Ashley Sparks
76. Diane Mathis Stokes
77. Jee Hye Tahk
78. Zulema R. Tapia
79. Araceli Tiscareno
80. Alina Vehuni
81. Jettrey Jerome Vercruse
82. Jennifer Elaine West
83. Carolyn Grace Widholm
84. Gary R. Willems

EXHIBIT B (page 3 of 3)

- 85. Teresa EB Williams
- 86. Jennifer Lynn Winans
- 87. Robyn Wessler Wisinski
- 88. Kathy K. Wong
- 89. Bobbi Sue Wooldridge
- 90. Whitney C. Worster
- 91. Peggy Young
- 92. Adrineh Yousefi
- 93. Jessica Zavala