

There are some points in Mr. Feeney's response on which I contest and request further action. There are other items on which I rebut, but do not request further action.

Below, I have provided original request, my request for review (submitted as part of my refined RFR), the district's responses, and my CONTEST/REBUTTAL. REBUTTAL means no further action requested. CONTEST means further action requested.

For convenience, I am attaching an index detailing what I'm requesting action on.

Please note, I have added Topic 6 as a point of reference for Topics 1-5, and I have added Topic 7 as a rebuttal requiring no further action.

## Topic 1, staff meetings

### Original Request:

1. Documents and communications related to the following meetings. I expect a list of attendees, meeting agendas & packets, meeting minutes, audio and video recordings, emails, text messages, memos, chats during the meeting, and any questionnaires or surveys.
  - a. Monday June 19th Webinar meeting regarding the Dennis Schools. This should include questions submitted by staff via a question box that was temporarily available as well as the times the question box was available for staff input. This should also include any recordings or notes taken prior to the start of the meeting, and the time each host & attendee joined and exited the webinar.
  - b. Faculty meetings with Dennis Staff for October 24th, 2022; November 2, 2022; February 7, 2023; March 7, 2023; April 17, 2023;

### RFR, I Received

1a: Questions submitted by staff (and possibly all chats) & time each attendee joined & exited

### Request For Review

A. **RFR:** 1a: Audio/Video recordings - Was the zoom (or other digital account) searched for a recording? Were staff/administration asked if they had a recording of the June 19th meeting? I've spoken with staff who suggest recordings may be available for staff meetings.  
- **District Response:** There are no additional documents responsive to the request. The meeting in question was not recorded.  
- **CONTEST:** See Topic 6.

B. **RFR:** 1a: emails - I've been told that staff had to register for the June 19th meeting. I was told this meeting was announced & a registration link sent via email. The response did not include this email, any replies, or any forwards.  
- **District Response:** The registration email, with forwards and replies for the June 19th email are attached hereto. The attached were not originally included as the District's Communications Department did not interpret Mr. Sutman's broad and non-specific request to include routine scheduling correspondence. There are no additional documents responsive to this request.  
- **REBUTTAL:** I requested "Documents and communications related to the following meetings" and I was very specific about what types of records I expected to be returned. Such emails are "communications related to the following meeting." Thank you for providing them now.

C. REMOVED

D. REMOVED

E. **RFR:** 1b: emails - I was told that an email was sent with an agenda for the February 7th meeting. The response did not include this email, or any replies or forwards of this email, or similar emails for the other staff meetings. I have been told by 4 separate staff that agendas are available for staff meetings. Were emails searched for, regarding this & the other meetings? Oct 24 2022, Nov 2, 2022, Feb 7, 2023, March 7, 2023, April 17, 2023.  
- **District Response:** Additional Agendas are attached hereto. There are no additional documents responsive to this request  
- **CONTEST a:** Thank you for attaching the agendas, but the agendas were regarding point G. Point E was regarding emails that announce staff meetings or contain an agenda for staff meetings. I am still seeking those emails.  
- **CONTEST b:** See Topic 6 - I am seeking an explanation of the search for these emails.

F. REMOVED

G. **RFR:** 1b: meeting agendas & packets, meeting minutes - No agendas or minutes were included for any of the staff meetings. I've spoken with 4 staff who say Agendas and minutes are available for staff meetings. I've been told Maria Robertson or Denise Swarouth typically records the minutes. I was told Maria Robertson was taking notes on her district issued computer at the February 7th meeting.  
- **District Response:** There are no additional documents responsive to the request. A hearsay assertion that an individual

employee was typing notes on her computer does not equate to the creation of a public record. Any such "records" fall within Section 7(1)(f) of the Act, 5 ILCS 140/7(1)(f).

- **CONTEST a:** Thank you for the March 7th & February 7th agendas (which you provided as a response to E, above). I do not see agendas for, and would like agendas for: Oct 24 2022, Nov 2 2022, April 17, 2023.

- **CONTEST b:** I still believe notes/minutes should be provided and that Section 7(1)(f) does not apply. Section 7(1)(f) states "a record shall not be exempt when the record is publicly cited and identified by the head of the public body." I agree that hearsay does not amount to "identified by the head of the public body." The Dennis Future Page (see <https://engage.dps61.org/dennisfuture>) states "Below is a timeline of events that led up to the findings by structural engineers and ultimately the closure of the two Dennis Lab School buildings." and then provides notes such as "October 24, 2022: First meeting between Superintendent and Dennis administration to discuss next steps for the future of Dennis Lab School, its grade-level separation, and staffing needs". There are similar types of notes for the other meetings in question. I believe this constitutes records of these meetings being "publicly cited" and "identified by the head ..." whereas the page is an official communication channel for the District. Further, Section 7(1)(f) states "Preliminary drafts, notes, recommendations, memoranda and other records in which opinions are expressed, or policies or actions are formulated..." If these notes which I seek are indeed "records in which opinions are expressed," or in which "policies or actions are formulated", then I believe it is the District's duty to provide these records to PAC in order to review and ensure that opinions are indeed expressed and that 7(1)(f) applies.

- **CONTEST c:** See Topic 6 - How were the meeting minutes / notes searched for? Who was contacted? Etc.

H. **RFR:** 1b: List of attendees - This should be included in meeting minutes. See the point above, G/1b

- **District Response:** There are no additional documents responsive to the request.

- **REBUTTAL:** No rebuttal, as this should be covered by G above.

I. **RFR:** 1b: audio/video recordings - I spoke with staff who suggested recordings may be available for staff meetings. None were received. Were recordings searched for?

- **District Response:** There are no additional documents responsive to the request.

- **CONTEST:** See Topic 6 - What systems were searched, Who was contacted in order to seek these records?

J. REMOVED

K. REMOVED

## Topic 2, communications:

### Original Request:

2. All communications related to the Dennis Structural issues (both buildings) between June 1 2022 and June 23, 2023.

a. This should include but is not limited to: emails, text messages, facebook messages, phone call records, video call records, and any other communications. This should include all communications with BFW Engineering and Klingner & Associates between September, 2022 and June 22, 2023. This should also include communications regarding purchase orders and contracts. This should include communications with media, including FOIA request & responses to FOIA requests. This should include communications with Kent Metzger's "maintenance foreman and mason," whom he referenced in a May 26th email. This should include emails of administration. This should include emails to and from members of the public expressing opinion or asking questions. Search terms for emails should include "Dennis", "French", "Structural", "Structure", "stair", "parapet", "deteriorate", "mosaic", "kaleidoscope", "damage". This request is NOT limited to the search terms I provided.

### RFR, I Received:

- Some Emails with engineering firms
- Some emails with media
- Some emails regarding Purchase orders with BFW

### Request For Review

A. **RFR:** A. any text messages, facebook messages, phone call records, video call records, or other records of communications.

- See sub-points A.1, A.2, A.3

A.1 **RFR:** I've since been told by the District that there was a phone call on February 22nd between Metzger & BFW. Were phone call records searched for?

- **District Response:** There are no additional documents responsive to this request. The District does not possess records of phone calls.

- **CONTEST a:** Public Access Opinion No. 11-006 states "Electronic records relating to the transaction of public business are "public records" subject to disclosure under section 2(c) of FOIA notwithstanding that they are generated on public officials' private equipment and/ or maintained on personal electronic accounts." If Kent Metzger made a call on February 22nd from his personal cell phone to a contractor (BFW), this is a public record and subject to disclosure. I expect a screenshot of his call logs from his phone for that/those February 22nd phone call(s) with BFW. I expect such a screenshot or call record to include details of date, time, and duration of phone call, as well as the phone number of the other party.

- **CONTEST b:** See Topic 6.

A.2 **RFR**: See B#3 - How did Holthaus know Metzger was out of the office from May 8 - May 12th? There should be some record of communication to explain this knowledge, but none was present in the emails.

- **District Response**: There are no additional documents responsive to this request. A.2 requests an explanation, not a record that can be produced.

- **CONTEST a**: The original request did not seek an explanation, but records of communications. The records I did receive show that Holthaus knew Metzger would be out of the office, but there were no communications provided that would explain how Holthaus knew Metzger would be out of the office. My question, seeking an explanation, was part of the request for review and intended to make a point that such records should exist. I'd be happy to receive an explanation, but primarily was and am still expecting records of communications that would have provided Holthaus with the knowledge that Metzger would be out of office. These may be text messages, emails, phone call records, or another form of communication.

- **CONTEST b**: See Topic 6.

A.3 **RFR**: Holthaus writes on May 31 (page 41) "Please send a zoom invite for our meeting this morning." 30 minutes later (page 43), Metzger forwards to dps admins clark, curry, marino & BlDD reps Kurtenbach & Oliver, writing "For today's meeting". There was no record of a zoom call.

- **District Response**: No Zoom call was held. There are no additional documents responsive to this request

- **CONTEST a**: See Topic 6.

- **CONTEST b**: My original request asked for "All communications related to the Dennis Structural issues". The records provided indicated that there would be a zoom call on May 31st. There are no records in my possession indicating that Holthaus's request for a "zoom invite for our meeting this morning" was rejected, or that other plans were established. Mr. Feeney's response that "No Zoom call was held" further supports that other communications should exist regarding a May 31st meeting - perhaps a phone call with Holthaus, or a text message establishing other plans for Holthaus's involvement. Further, an August 2 FOIA I submitted returns a record showing that there was an "Emergency Meeting - Discuss Dennis Kaleidoscope" in the "Supt's Office" on May 31st from 8:30am-10:30am involving "Kent Metzger; Rochelle Clark; Jay Marino; Michael Curry; Denise Swarthout; Jason Fox; Deanne Hillman; Jeffery Dase". Perhaps one of those individuals communicated with Holthaus either discussing alternate attendance options, or denying his request for a zoom link. Further, I previously asked the District "There was a May 31st zoom meeting with Holthaus, and emails suggest BLDD was part of that call too. What was the purpose of that call? Can you provide documentation about and recording of the meeting?" and was given the answer "This is inaccurate. A Zoom meeting did not occur on this date." The District's response there appears to be technically accurate, but not forthcoming. I share this context to show that these records are of public interest. On this CONTEST b, I am seeking communications with Holthaus regarding the May 31st meeting.

B. **RFR**: The email records show multiple gaps in communication where I suspect there was another form of communication.

Some of these gaps include:

- See sub-point B.3

B.1 REMOVED

B.2 REMOVED

B.3 **RFR**: (Same as A#2) A May 15th email from Holthaus to Metzger states "While you were out of the office last week" - The records provided do not show an email or any other communication to Holthaus, informing Holthaus that Metzger was out of the office from May 8th - May 12th. I expect some communication informing Holthaus of Metzger's being out of the office.

- **District Response**: There are no additional documents responsive to this request.

- **CONTEST**: This is thoroughly addressed by A.2 and does not need to be re-stated. Action on A.2 should satisfy this B.3

C. **RFR**: Any communications prior to March 23rd. The District states (on <https://engage.dps61.org/dennisfuture>) they sought inspection on March 22nd, but the records in my possession show no communications prior to March 23rd. The District has since told me Metzger had a phone call with BFW on February 22nd. Knowing this call happened, and that no phone call records were returned to me: (See sub-points C.1, C.2)

- **District Response**: There are no additional documents responsive to this request. The District does not possess records of phone calls.

- **CONTEST a**: See Topic 6. I expect an explanation of search for phone call records prior to March 23rd.

- **CONTEST b**: The February 22nd phone call record is addressed by A.1. Other phone call records should be returned. See A.1 regarding phone call records.

C.1 **RFR**: 1. I expect record of the Feb 22 phone call.

- **District Response**: There are no additional documents responsive to this request. The District does not possess records of phone calls

- **REBUTTAL**: This Feb 22 call is thoroughly addressed by A.1 above, and does not need to be restated here.

C.2 **RFR**: 2. Were phone call records searched for? Particularly records of Metzger calls with BFW and Klingner

- **District Response**: C.2. seeks an explanation, not a record that could be produced and/or seeks the same information as C.1.

- **CONTEST**: C (no number) is asking for records. This C.2 is asking for explanation of the search. However, This C.2 contest should be satisfied by C. CONTEST a.

D. **RFR**: FOIA Responses related to Dennis. Note that FOIA Requests are viewable at <https://www.dps61.org/Page/70>, but

responses are not online.  
- See sub-points D.1 & D.3

D.1 **RFR**: Valerie Wells submitted a request on June 7th related to Dennis & received a response on June 14th. I also received Valerie's email request in a FOIA response I received on June 8th. Neither her email request nor the response to her request were included in my June 23rd response.

- **District Response**: FOIA responses to Valerie Wells are attached hereto. These records were previously provided to Mr. Sutman on June 08, 2023 in response to his June 01, 2023 FOIA request.

- **REBUTTAL**: Thank you for providing these. The June 8th response did include Valerie's request, and after reviewing the document now provided, I believe everything sent to Valerie was provided to me on June 8th, except for the District's FOIA Response Letter. The Response letter is now available to me, and thank you for providing it.

D.2 REMOVED

D.3 **RFR**: On June 13, Andrew Montgomery requested "Documents, bids, contracts, ... related to the replacement plan of Dennis Lab School campus ..." He received an extension until June 28th. I would like the full response that was sent to Montgomery, as well as the original email Montgomery sent to Bradford.

- **District Response**: FOIA responses to Andrew Montgomery are attached hereto. These records were not initially interpreted to be part of Mr. Sutman's request.

- **REBUTTAL**: I understand the under-interpretation, since I had not specified Montgomery's FOIA, and I appreciate the documents now being provided. Thank you.

E. **RFR**: Emails to and from members of the public - I received none of these, and I suspect there are many. I know there are some public comments submitted via email, for the Board of Education meeting, which were not included in my response. Those may be in Board Meeting Minutes, but I believe Bradford should have informed me of this if it is the case.

- **District Response**: Additional records are attached. These records were not initially interpreted to be part of Mr. Sutman's request. ... The July 11, 2023 Board of Education Open Session Packet ...

- **REBUTTAL**: I understand the initial under-interpretation. Thank you for providing these.

F. **RFR**: Search terms - Were searches conducted for the search terms I provided?

- **District Response**: There are no additional documents responsive to this request. F. seeks an explanation, not a record that could be produced.

- **REBUTTAL**: The original request was for emails containing search terms, the RFR asked for an explanation of the search involved. Subsequent requests suggest this search-term based request would be unduly burdensome and I may submit a subsequent request with more specificity. I was going to request an explanation, per Topic 6, but do not believe it will be useful, so I am yielding on this point.

G. REMOVED

H. **RFR**: Communications with Kent Metzger's "maintenance foreman and mason" - In a May 26th email, Metzger wrote to Holthaus: "My maintenance foreman and mason are knowledgeable about some structural issues so they can meet too." No communications with the maintenance foreman and mason were included. Were texts, emails, digital maintenance requests, or other forms of electronic communications searched?

- **District Response**: There are no additional documents responsive to this request. H. seeks an explanation, not a record that could be produced.

- **CONTEST a**: My original request asked for 'Communications with Kent Metzger's "maintenance foreman and mason"'. The appeal asked for an explanation of the search. I would still like the original item to be fulfilled.

- **CONTEST b**: See Topic 6 - I'd like an explanation of the search efforts to provide 'Communications with Kent Metzger's "maintenance foreman and mason"'.  
"

I. **RFR**: Communications with media - WAND covered this Dennis story multiple times, but the FOIA response does not include any communications with WAND.

- **District Response**: There are no additional documents responsive to this request.

- **CONTEST**: See Topic 6 - I'd like an explanation of the search efforts to find communications with WAND.

J. REMOVED

K. REMOVED

L. REMOVED

## Topic 3 - Documents Related to Dennis Structural Issues

### Original Request:

3. All documents related to the Dennis Structural issues. This should include, but is not limited to: purchase orders for any

related work, findings from structural inspections performed by BFW, any documentation from Klingner other than the detailed reports released online, as well as any contracts for work from these or other firms.

#### **RFR, I received:**

- Nothing. The response pointed me to <https://engage.dps61.org/dennisfuture>

#### **Request For Review:**

A. **RFR:** Purchase orders with BFW & with Klingner or any other related work were not present

- **District Response:** There are no additional documents responsive to the request.

- **REBUTTAL:** An Aug 2 FOIA Request (returned Aug 16) returned a P/O for BFW with a date of June 27, 2023. The Aug 2 request shows there are no documents responsive to my request for a P/O with Klingner. Because my Aug 2 request is much more specific and better formatted, I may request review on the Klingner P/O, but am not contesting the response here.

B. **RFR:** (lengthy)

- **District Response:** There are no additional documents responsive to the request. B. is a complaint regarding the District's original response, and does not seek additional records that could be produced.

- **REBUTTAL:** I agree. This was a complaint.

C. **RFR:** Preliminary findings from BFW for Mosaic Campus. - The website above details that on May 30th "Initial structural analysis completed on-site at both Dennis Lab school buildings" and provides a link "Click here to view the initial structural engineering

analysis." which links to ... [pdf link] ... Initial findings for the Kaleidoscope campus (original French) were released, but initial findings for Mosaic Campus (original Dennis) were NOT released and still are not available online. I would like the original findings for Mosaic, if they exist.

- **District Response:** There are no additional documents responsive to the request.

- **CONTEST:** See Topic 6. I would like an explanation of the search efforts for initial findings for the Mosaic Campus.

D. **RFR:** Contracts for work - These were not included. On May 24th, Angela Brown wrote to Holthaus (BFW) "Attached is the signed agreement." The emails do include a March 23rd contract proposal from BFW, and I believe the "signed agreement" is the same proposal, but would like that reviewed. I believe a signed copy of the contract should have been returned on its own. No contracts with Klingner were sent to me. Michael Fries (Klingner) writes in a June 2nd email (page 45) "Thanks for the signed agreement." The (presumably) attached agreement was not included in the emails & was not sent as part of this FOIA item #3

- **District Response:** The District's email search function does not automatically include attachments in email results. A copy of the executed Agreement is attached hereto.

- **REBUTTAL:** Thank you for attaching the signed contract with BFW.

- **CONTEST:** Please send the signed contract with Klingner. If not available, please explain the search, per Topic 6.

E. REMOVED

F. REMOVED

## **Topic 4, Dennis/Repairs:**

#### **Original Request:**

4. For both Dennis buildings: Documents and repair records and work records related to the 2013 10-year HLS Surveys, and 2023 annual HLS Surveys performed by the regional superintendent's office for both buildings. As the 10-year surveys are available online, I do not need those.

**RFR, I Received:** 2023 annual HLS Surveys for both buildings, as well as Kent Metzger's responses indicating what work would be completed.

#### **Request For Review:**

A. **RFR:** Repair records related to problems found in the 2013 survey. The survey itself is available online and details building issues, but any work that came after the survey is not. I suspect the District is supposed to keep records of repairs and report them to ROE #39 or ISBE or both. ROE#39 Superintendent Jill Reedy has told me that DPS communicates through a system called IWAS, with regard to HLS surveys. The 2023 Annual surveys show communications from Metzger about work to be completed. I suspect something similar for the 2013 10-year surveys.

- **District Response:** Additional documents attached hereto. This information was previously provided to Mr. Sutman on July 10, 2023 in response to his June 23, 2023 FOIA request.

- **REBUTTAL:** Thank you for providing digital maintenance requests as spreadsheets for both French/Kaleidoscope (as part of this Topic 4) and Dennis/Mosaic (as part of Topic 5, in batch 2). I did receive these as part of my August 2nd Request/August 16th response. However, in the Aug 2 request, I asked for spreadsheet files. In the Aug 16th response, I received PDF files, not spreadsheets. These being attached here as spreadsheets means I will not need to submit an RFR to get spreadsheet copies regarding the Aug 16th response.

- **CONTEST:** It does not appear that any IWAS records have been provided, unless this is the same system as maintenance

requests (which I believe to be in School Dude). If IWAS records are not provided, please explain per Topic 6.

## Topic 5, Documents related to previous repairs:

### Original Request:

5. Documents related to inspections and repairs detailed in the Klingner inspections. These should include:
- Dennis: "previous concerns of the basement slab and foundation had led to others drilling two small exploratory holes in the basement floor slab below the lowest portion of the north stair,"
  - Dennis: "an [8 inch] steel W-beam was added at some time in the past"
  - Dennis: "added brick support pedestals on the east and west ends,"
  - Dennis: "it is possible that the columns were added at some time in the past as a repair attempt"
  - Dennis: "someone has had to cut the door down to reduce the door height by up to 1" to "allow the doors to be able to swing open."
  - French: Previous tuckpointing of mortar joints in the area inspected by Klingner
  - French: "The inside face of parapet appears to have been coated and painted to attempt to prevent moisture infiltration of the parapet,"
  - French: "A few locations of pocketed roof framing on the south end were observed to have steel straps or shims added in an attempt to prevent the wood framing from pulling out of the pocket"
  - French: "Previous attempts to sister some of the water deteriorated roof joists was observed near the north wall bearing."

**RFR, I Received:** A response pointing me to <https://engage.dps61.org/dennisfuture> where the full Klingner report is found.

### Request For Review:

A. **RFR:** Any documents related to the work I specified.  
- See sub-points A.2 and A.2

A.1 **RFR:** "a.) basement slab" is likely covered by BFW's report - BFW's June 20th report shows they are the ones who drilled those holes.

- **District Response:** There are no additional documents responsive to this request. A.1. contains a conclusion, but it is unclear what records are alleged to have not been provided.

- **REBUTTAL:** This has since been resolved. The document in question is the BFW report provided to the district on June 20th, and this document should have been provided, but no further action is needed now.

A.2 **RFR:** The other repairs, b.-i. were done in the past (per Klingner's report), prior to Klingner's inspection, and I am seeking documents related to those past repairs. I am not seeking Klingner's report, which is online, as Bradford mentioned. At the very least, I suspect the District has work orders instructing employees to complete repair work, and digital maintenance requests related to those items.

- **District Response:** Additional documents are attached hereto. The Work Orders are attached hereto were previously provided to Mr. Sutman on August 16, 2023 in response to his August 02, 2023 FOIA request.

- **REBUTTAL a:** See Topic 4 (A) REBUTTAL.

- **REBUTTAL b:** I believe the Digital Maintenance Requests for Mosaic provided do not include 5b, 5c, or 5d. I have not yet reviewed the Kaleidoscope/French Digital Maintenance Requests. I am unable to contest this point without more time and a more thorough review. My Aug 2 request asked for records from 2017-2023. I may submit a later FOIA request for digital maintenance requests prior to that time frame, which I suspect will catch these items missing from the documents currently available.

## Topic 6 (new topic): Explanation of Records / Searches

Ms. Goldsmith's letter stated: "please explain how the School District searched for records responsive to the parts of Mr. Sutman's FOIA request for which he alleges that the School District failed to provide all responsive records, specifying which recordkeeping systems were searched, how they were searched (i.e. keywords used), any individuals who were contacted as part of the search, and why and how those measures were taken"

Mr. Feeney stated: "The request required numerous administrators and staff to cease other tasks for significant time periods in order to evaluate the request and compile records. The administrative time spent searching for records responsive to Mr. Sutman's request can be measured in days rather than hour."

Mr. Feeney also provided point-by-point responses, which are greatly appreciated.

Neither the statement quote above, nor the point-by-point responses include an explanation of "how the School District

searched for records responsive to" records I allege to be missing. The explanations do not specify "which recordkeeping systems were searched, how they were searched (i.e. keywords used), any individuals who were contacted as part of the search, and why and how those measures were taken"

In some of my above CONTESTs, I write "See Topic 6". This means, for that point, I am seeking these explanations that Ms. Goldsmith asked for.

## **Topic 7 - Unduly Burdensome**

Regarding the claim "Several of the requests contain numerous sub-requests or sub-questions which exponentially increase the overall scope of the request." - I agree my request was for a significant number of records. I concede that the formatting of my request was not ideal, and that a more organized formatting would have made it easier for the District to comply in full.

Regarding the claim that my original request could have been classified as unduly burdensome, and regarding Mr. Feeney's assertions "The request required numerous administrators and staff to cease other tasks for significant time periods in order to evaluate the request and compile records. The administrative time spent searching for records responsive to Mr. Sutman's request can be measured in days rather than hour."

I am very grateful to the District for attempting to comply with my request and for dedicating staff time to the pursuit of records that are of public interest. My work investigating the circumstances surrounding the Dennis School closures and structural inspections can be measured in weeks, not days, and I do so at my own expense, in the interest of the public. The District staff's labor related to the buildings closing (setting up GLA, etc) can also be measured in weeks, which is of much greater taxpayer cost than the days of responding to my FOIAs.

Regarding "However, it must be noted that the underlying June 23rd request could have been subject to a request to narrow to a manageable proportion and/or denial as unduly burdensome under the Act."

I disagree. If the District had claimed my request as unduly burdensome, I would have argued that the public interest in the information outweighs the burden on the school District, and I have numerous points to support my position. However, the District did not claim the request as unduly burdensome, so I will not belabor this point.