

**Plaintiff's Memorandum of Law in Support of Motion for  
Summary Judgment - Exhibit List**

*I.P. v. Tullahoma City Schools, et al.*  
Eastern District of Tennessee

<b>Exhibit</b>	<b>Description</b>
A	I.P. Instagram Post: Quick Holding Vegetables
B	I.P. Instagram Post: Quick as a Japanese Cartoon Cat in a French Maid Dress
C	I.P. Instagram Post: Quick Hugged by a Cartoon Bird
D	I.P. Deposition Transcript Excerpts
E	B.P. Deposition Transcript Excerpts
F	Quick Deposition Transcript Excerpts
G	Crutchfield Deposition Transcript Excerpts
H	Flowers Deposition Transcript Excerpts
I	Declaration of A.L.
J	R.Y. Deposition Transcript Excerpts
K	Scott Deposition Transcript Excerpts
L	Quick Aug. 16, 2022 Email to B.P.

M	Tullahoma High School Student Handbook 2022–2023
N	Tullahoma City Schools Policy 6.316: Suspension
O	B.P. August 12, 2022 <i>Mahanoy</i> Letter
P	Declaration of Dr. Catherine Stephens
Q	Stephens' July 19, 2023 Text Message to Greg English
R	School District Responses to Plaintiff's Interrogatories Excerpt

# EXHIBIT A



MY BROTHA 🔥

On god

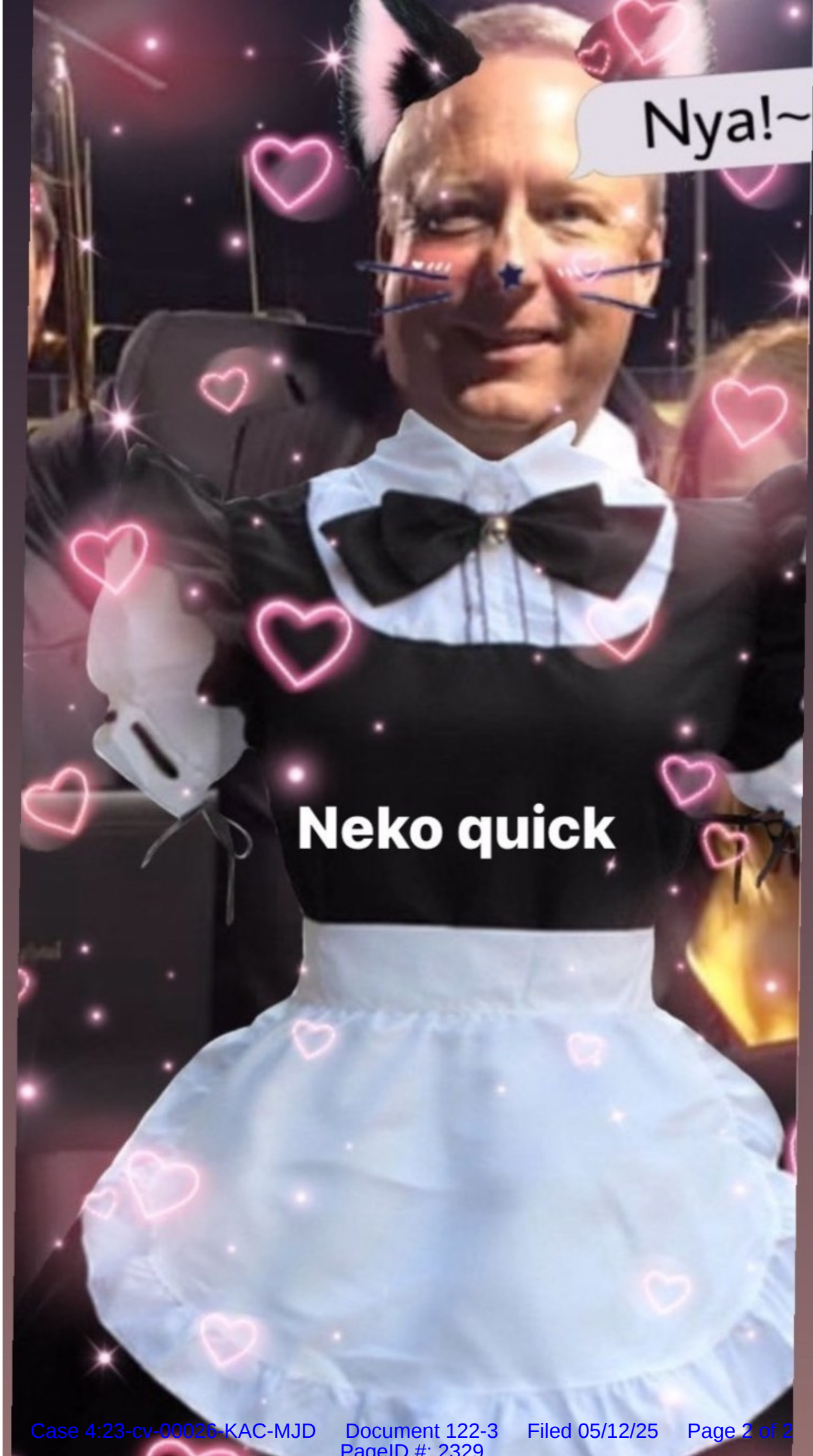
like a sister but  
not a sister<33



Add yours



# EXHIBIT B



Nya!~

**Neko quick**

# EXHIBIT C



**NOOO JASON DONT LEA VE ME**

# EXHIBIT D

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
 2 EASTERN DISTRICT OF TENNESSEE  
 3  
 4 AT WINCHESTER DIVISION

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5 I.P. a minor, by and through B.P.,  
 6 Plaintiff,  
 7 vs. No. 4:23-cv-00026  
 8 TULLAHOMA CITY SCHOOLS, a  
 9 political subdivision of the  
 10 State of Tennessee; JASON QUICK,  
 11 in his individual capacity; and  
 12 DERRICK CRUTCHFIELD, in his  
 13 individual capacity,  
 14  
 15 Defendants.

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16 Deposition of:  
 17 I.P.  
 18  
 19 Taken on behalf of the Defendants  
 20 January 15, 2025  
 21 Commencing at 9:00 a.m. (CST)  
 22  
 23

---

24 REPORTED BY: Tonya D. Stolze, LCR  
 25

Page 3

1 I N D E X  
 2  
 3  
 4  
 5 Examination 7  
 6 by Mr. Sellers  
 7 Examination 225  
 8 by Mr. Fitzpatrick  
 9  
 10  
 11  
 12 E X H I B I T S  
 13  
 14 Exhibit No. 1 Page 56  
 15 KKK Meme  
 16 Exhibit No. 2, for identification 59  
 17 Hitler Meme  
 18 Exhibit No. 3 62  
 19 Neko quick meme - I.P. 0000668  
 20  
 21 Exhibit No. 4 68  
 22 Quick holding vegetables meme -  
 23 I.P. 0000667  
 24  
 25 Exhibit No. 5 71  
 26 Meme - I.P. 0000669  
 27 Exhibit No. 6 73  
 28 Meme - I.P. 0000671  
 29  
 30 Exhibit No. 7 133  
 31 Messages - I.P. 0000793  
 32

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1 A P P E A R A N C E S  
 2  
 3  
 4 For the Plaintiff:  
 5  
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 9 And Expression  
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 11 Suite 340  
 12 Washington, D.C. 20003  
 13 (215)717-3473  
 14 conor.fitzpatrick@thefire.org  
 15  
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 18 Foundation For Individual Rights  
 19 And Expression  
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 21 Suite 900  
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 24 jeff.zeman@thefire.org  
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For the Defendants:  
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 (731)300-0737  
 andrew@schofcounsel.com

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1 E X H I B I T S  
 2  
 3  
 4 Exhibit No. 8 Page 147  
 5 Messages - I.P. 0000645-0000666  
 6  
 7 Exhibit No. 9 169  
 8 Messages - I.P. 0000716-0000720  
 9 Exhibit No. 10 175  
 10 Messages - I.P. 0000794-0000795  
 11  
 12 Exhibit No. 11 180  
 13 Messages - I.P. 00007240-00007235  
 14 Exhibit No. 12 182  
 15 Messages - I.P. 0000803-0000804  
 16  
 17 Exhibit No. 13 185  
 18 Messages - I.P. 0000751-0000752  
 19 Exhibit No. 14 186  
 20 Messages - I.P. 0000768-0000770  
 21  
 22 Exhibit No. 15 188  
 23 Messages - I.P. 0000797-0000800  
 24 Exhibit No. 16 190  
 25 Messages - I.P. 0000801-0000802  
 26  
 27 Exhibit No. 17 191  
 28 Messages - I.P. 0000820-0000822  
 29 Exhibit No. 18 193  
 30 Messages - I.P. 0000683-0000688  
 31  
 32 Exhibit No. 19 194  
 33 Messages - I.P. 0000796  
 34 Exhibit No. 20 195  
 35 Messages - I.P. 0000750  
 36  
 37 Exhibit No. 21 196  
 38 Messages - I.P. 0000674-0000675  
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1		
2	E X H I B I T S	
3		Page
4	Exhibit No. 22	198
	Messages - I.P. 0000706-0000707	
5		
	Exhibit No. 23	199
6	Messages - I.P. 0000738	
7	Exhibit No. 24	202
	Screenshot of message -	
8	I.P. 0000814	
9	Exhibit No. 25	203
	Photo - I.P. 0000806	
10		
	Exhibit No. 26	204
11	Screenshots of student handbook -	
	I.P. 0000807	
12		
	Exhibit No. 27	205
13	Screenshot - I.P. 0000808	
14	Exhibit No. 28	208
	Screenshot - Attack on Titan -	
15	I.P. 0000810	
16	Exhibit No. 29	208
	Attachment from message exchange -	
17	I.P. 0000811	
18		
19		
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21		
22		
23		
24		
25		

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\* \* \*

MR. SELLERS: Just as a matter of housekeeping, it's been agreed to amongst counsel that due to the fact that we're dealing with a number of minors or former at least minors at the time some of this occurred that we'll be discussing today, that although we may use their names during the deposition, that the court reporter has agreed when the transcript is being done, that she will just put in the initials for the individuals. Is that agreed to?

MR. FITPATRICK: That's correct.

\* \* \*

I.P.,

was called as a witness, and after having been duly sworn, testified as follows:

EXAMINATION

QUESTIONS BY MR. SELLERS:

Q. I.P., can you state your full name?

**A. I.P.**

Q. Okay. Have you ever given a deposition before?

**A. No.**

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S T I P U L A T I O N S

The deposition of I.P., was taken by Notice, at Tullahoma City School District, 510 South Jackson Street, Tullahoma, Tennessee, on January 15, 2025, for all purposes under the Federal Rules of Civil Procedure.

All formalities as to caption, notice, statement of appearance, et cetera, are waived. All objections, except as to the form of the question, are reserved to the hearing, and that said deposition may be read and used in evidence in said cause of action in any trial thereon or any proceeding herein.

It is agreed that TONYA D. STOLZE, LCR, Notary Public and Court Reporter for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness was not discussed.

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Q. Okay. Let me give you some basic ground rules, and you may have already heard this. Obviously, I'm here to ask you some questions today about the lawsuit that has been filed, the events of August 10th of 2022. Do you understand that?

**A. Yes.**

Q. And there may be some questions I ask you today that just call for a yes or no answer. If so, can you make sure you give me a good verbal response? I know we all -- I mean, we're sitting here looking at each other across the table. And I know we all get in the habit of just nodding or shaking our heads.

And, obviously, I'm directly across from you, and I know what you mean by that. But obviously the court reporter is here taking down everything that's said today, and it's very difficult for her to take down a nod or a shake of the head, so if you could give me a good verbal response.

And I know down here in the south we also have a habit of saying uh-huh and huh-uh for yes and no. If you could please refrain from doing that and give me a yes or no because that's very difficult for them to take down and even more difficult for us as attorneys, if we go back to read the transcript,

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1 and his mental health condition, I'll just designate  
 2 everything related to his mental health treatment  
 3 and the medications he's on as confidential under  
 4 the protective order --  
 5 MR. SELLERS: Okay.  
 6 MR. FITPATRICK: -- consistent with how  
 7 we've treated his medical records.  
 8 MR. SELLERS: Okay.  
 9 BY MR. SELLERS:  
 10 Q. Let me repeat my question. What did you do  
 11 today in preparation of your deposition?  
 12 **A. Today --**  
 13 Q. Yes, sir.  
 14 **A. -- or --**  
 15 Q. Well, just before the deposition today. Did  
 16 you do anything to prepare for your deposition?  
 17 **A. I met with my counsel yesterday --**  
 18 Q. Okay.  
 19 **A. -- and ran over some things.**  
 20 Q. Okay. Did you review any documents?  
 21 MR. FITPATRICK: I'm going to object to  
 22 that question on privileged grounds with the  
 23 exception of any documents he reviewed that  
 24 refreshed his recollection.  
 25 //

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1 BY MR. SELLERS:  
 2 Q. Okay. Did you review any documents that  
 3 refreshed your recollection?  
 4 **A. Yes.**  
 5 Q. Okay. What documents did you use to refresh  
 6 your recollection?  
 7 **A. Transcripts of messages between me and**  
 8 **friends and pictures of group texts.**  
 9 Q. Okay. Anything -- any other documents you  
 10 reviewed for refreshing your recollection?  
 11 **A. I don't think so.**  
 12 Q. Okay. Where do you currently live?  
 13 **A. [REDACTED] Tullahoma, Tennessee.**  
 14 Q. Who lives there with you?  
 15 **A. My mother and my brother.**  
 16 Q. And what's your brother's name?  
 17 **A. E.P.**  
 18 Q. Is he older or younger?  
 19 **A. Older.**  
 20 Q. Okay. Did E.P. live at that address during  
 21 the time frame regarding the incident we're about  
 22 here today?  
 23 **A. It's hard to say. He's -- he's been on and**  
 24 **off because of his own mental health issues.**  
 25 Q. Okay. So it's possible he was living there

Page 15

1 at the time, but you don't know for certain at this  
 2 point?  
 3 **A. Yes.**  
 4 Q. Okay. What's your date of birth?  
 5 **A. [REDACTED]**  
 6 Q. Don't make me do math. How old are you  
 7 today?  
 8 **A. 19.**  
 9 Q. 19. Okay. And where were you born?  
 10 **A. Winchester, Tennessee.**  
 11 Q. Okay. Where were you raised from?  
 12 **A. My majority of life Tullahoma.**  
 13 Q. Okay. Do you recall when you moved to  
 14 Tullahoma how old you were?  
 15 **A. I think two.**  
 16 Q. Okay. So growing up you went to Tullahoma  
 17 Schools?  
 18 **A. Uh-huh.**  
 19 Q. Okay.  
 20 **A. Yes.**  
 21 Q. That's fine. And have you lived in Tullahoma  
 22 continuously since that time?  
 23 **A. Yes, with the exception of school.**  
 24 Q. Okay. Are you currently working anywhere?  
 25 **A. No.**

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1 Q. Are you attending school anywhere?  
 2 **A. I'm attending MTSU.**  
 3 Q. Okay. Are you a freshman there?  
 4 **A. Yes.**  
 5 Q. Okay. Did you begin attending there in  
 6 August of 2024?  
 7 **A. I don't remember if it was August, but I**  
 8 **started this semester -- this past semester.**  
 9 Q. So you've completed one semester of college?  
 10 **A. Yes.**  
 11 Q. Okay. It's my understanding you graduated  
 12 from Tullahoma High School in 2024; is that right?  
 13 **A. Yes.**  
 14 Q. Okay. Do you have a major at MTSU?  
 15 **A. Trombone Performance.**  
 16 Q. Kind of what career or job field are you  
 17 wanting to go into once you graduate from college?  
 18 **A. Preferably a job in orchestra and some**  
 19 **freelance trombone work on the side.**  
 20 Q. What kind of grades did you make your first  
 21 semester?  
 22 **A. As and Bs and maybe a C, but I can't check**  
 23 **because of an outstanding ticket.**  
 24 Q. Like a parking ticket?  
 25 **A. Yeah.**

Page 17

1 Q. Yeah. Parking on school campus is not -- is  
 2 not easy, is it?  
 3 **A. Yeah, especially one as small as MTSU.**  
 4 Q. Are you involved with any kind of  
 5 organizations at MTSU, such as fraternity, in the  
 6 band, student government, anything like that?  
 7 **A. Only -- only credited ensembles.**  
 8 Q. Okay. Explain that to me.  
 9 **A. Like bands. I was in orchestra and a jazz**  
 10 **band this past semester and also trombone studio.**  
 11 Q. I think I saw a YouTube video put out by the  
 12 school of music where you were like in Jazz Ensemble  
 13 II. Was there a difference between Jazz Ensemble II  
 14 and Jazz Ensemble I?  
 15 **A. Jazz Ensemble I is the higher level ensemble.**  
 16 Q. Okay. Is that generally upperclassmen?  
 17 **A. Yes, and graduate students. But hopefully I**  
 18 **can get in -- make it in this semester.**  
 19 Q. Okay. Is that something you like tryout for?  
 20 **A. Yes.**  
 21 Q. Okay. Prior to attending MTSU had you taken  
 22 any type of college courses anywhere else?  
 23 **A. I attended Governor's School for trombone and**  
 24 **got three credit hours for that.**  
 25 Q. And that was during your high school career?

Page 19

1 for Governor's School?  
 2 **A. I don't remember, but I'm pretty sure that**  
 3 **Mr. Scott was one of them.**  
 4 Q. Okay.  
 5 **A. And Ms. Burton as well.**  
 6 Q. And they're kind of the co-band directors; is  
 7 that right?  
 8 **A. At the time, yes.**  
 9 Q. Okay. I assume that you were in band during  
 10 high school; is that right?  
 11 **A. Yes.**  
 12 Q. All four years?  
 13 **A. Yes.**  
 14 Q. Okay. Does Tullahoma have a marching band?  
 15 **A. Yes.**  
 16 Q. Were you in the marching band?  
 17 **A. Yes.**  
 18 Q. I know some schools also have -- because that  
 19 -- I think primarily in the marching band a fall  
 20 activity?  
 21 **A. Yes.**  
 22 Q. Okay. During the rest of the year, did they  
 23 also have like ensemble groups?  
 24 **A. Yes.**  
 25 Q. What ensemble groups did they have at

Page 18

1 **A. Yes.**  
 2 Q. Okay. Is that generally your junior year  
 3 that you go to Governor's School?  
 4 **A. Yes, it was.**  
 5 Q. Let me -- let me rephrase -- let me rephrase  
 6 that. My recollection is that's something that  
 7 occurs during the summer; is that right?  
 8 **A. Yes.**  
 9 Q. Okay. Is that something you attend before  
 10 your junior year or something you attend before your  
 11 senior year?  
 12 **A. I attended it before my senior year, but it's**  
 13 **open to people going into their junior or senior**  
 14 **year.**  
 15 Q. Okay. And is that something you have to be  
 16 nominated to?  
 17 **A. There's a -- there's a lengthy application**  
 18 **process with recommendations and --**  
 19 Q. Okay.  
 20 **A. -- and an essay, showing them your skills.**  
 21 Q. Okay. So in order to do that, you had to get  
 22 recommendations, I assume, from teachers at the high  
 23 school?  
 24 **A. Yes.**  
 25 Q. Okay. What teachers gave you recommendations

Page 20

1 Tullahoma High School that you participated in?  
 2 **A. Concert bands, some phonic bands, jazz --**  
 3 **jazz bands, multiple small ensembles. Like I was in**  
 4 **brass quintets, a trombone duet -- two trombone**  
 5 **duets, a trombone quartet, and the large brass**  
 6 **ensemble.**  
 7 Q. Okay. And would these ensembles kind of give  
 8 concerts at the school and in the community?  
 9 **A. The large brass ensemble and the two bands**  
 10 **and the jazz ensemble did and also the brass quintet**  
 11 **and one of my duets did.**  
 12 Q. Okay. In my understanding that you were --  
 13 well, strike that. At some point in time did you  
 14 become first chair trombone?  
 15 **A. Yes, a few years.**  
 16 Q. Okay. When did you become first chair  
 17 trombone?  
 18 **A. I was first chair concert bands my freshman**  
 19 **year. I placed second overall, but I couldn't make**  
 20 **it into some phonic because of me being a freshman**  
 21 **at the time. I'm pretty sure I was first chair my**  
 22 **sophomore year and my senior year.**  
 23 Q. Okay.  
 24 **A. And I was also -- I was also second tuba in**  
 25 **concert band my senior year.**

Page 21

1 Q. Okay.

2 **A. And first chair jazz every year except my**

3 **freshman year.**

4 Q. Okay. Were you first chair your junior year?

5 **A. No. I placed -- I placed fourth because of**

6 **silly mistakes, and I didn't get a chance to**

7 **challenge by -- by the end of the year. I went to**

8 **second chair, I think.**

9 Q. When you say -- are you talking about silly

10 mistakes in your performance?

11 **A. Yes.**

12 Q. Okay.

13 **A. I went too high in my scales.**

14 Q. Okay. And it's my understanding to become

15 first chair there's a competition involved in

16 getting to that level?

17 **A. Yes.**

18 Q. Did you work anywhere while you were in high

19 school?

20 **A. No.**

21 Q. Okay. Other than your band activities, any

22 other organization you were involved in while you

23 were in high school?

24 **A. I was in Boy Scouts up until early in my**

25 **junior year.**

Page 22

1 Q. Until early in your junior year? Is that

2 what you said?

3 **A. If I remember correctly, yes.**

4 Q. Okay.

5 **A. It may also have been late sophomore year.**

6 Q. Okay. What rank did you achieve in Boy

7 Scouts?

8 **A. Like First Class, Second Class, Eagle Scout,**

9 **that sort of rank, or like my rank in the troop?**

10 Q. What I was talking about, did you make it to

11 Eagle Scout?

12 **A. No.**

13 Q. Okay.

14 **A. I made it to First Class.**

15 Q. Okay. Why did you drop out of Boy Scouts?

16 **A. It was too time consuming, and I needed more**

17 **time to focus on trombone.**

18 Q. Okay. Any other activities you were involved

19 in during high school?

20 **A. No.**

21 Q. Okay. Other than Governor's School was there

22 any other type of honors you received during high

23 school?

24 **A. I made Midstate Concert Bands all four years.**

25 **I made Midstate Jazz Bands two years. And I went --**

Page 23

1 **I was able to go to All State's Concert Bands,**

2 **Orchestra, and Jazz Bands. And I chose to do All**

3 **State Jazz, and I was third chair.**

4 Q. Okay. What year was that?

5 **A. All State?**

6 Q. Yes.

7 **A. My senior year.**

8 Q. Okay. Let me -- let me go back to one of my

9 questions because you -- you answered about

10 Governor's School. Did you take any other kind of

11 courses or classes from any college or university?

12 I know sometimes some high schools have dual credit

13 where you can go to like the local community college

14 and take a class and get dual credits for it.

15 **A. Not any credited classes or any organized**

16 **classes.**

17 Q. Okay. Did you take some kind of classes you

18 didn't get credit for?

19 **A. I attended multiple master classes for**

20 **trombone, and I took part in a Trombone Studio**

21 **Class.**

22 Q. Okay. Where did you do that at?

23 **A. A few master classes were at MTSU. There was**

24 **one by Pat Coil, which was a Jazz Arranging**

25 **Masterclass, a Trombone Master Class by Peter**

Page 24

1 **Steiner, and then I attended one at Vanderbilt that**

2 **was done by Jo Alessi, who's at the top of the**

3 **trombone world, and the Studio Class that I attended**

4 **was at MTSU.**

5 Q. Okay. But that wasn't something you received

6 any kind of credit for. That was just, I guess, for

7 your enrichment in getting better on the trombone?

8 **A. Yes.**

9 Q. Okay. I'm going -- I'm going to test your

10 memory here. Okay. What classes did you take your

11 senior year at Tullahoma High School?

12 **A. Marching Bands, Concert Bands. Marching**

13 **Bands was an honors class for me.**

14 Q. Okay.

15 **A. Symphonic Band Honors, Pre-Cal, English IV,**

16 **Personal Finance. I don't remember the rest.**

17 Q. Okay. What kind of grades did you make your

18 senior year?

19 **A. Generally all As, maybe a high B, and I**

20 **barely passed Personal Finance.**

21 Q. Was there any specific reason you were having

22 trouble in Personal Finance?

23 **A. The teacher was very not fitting to my needs,**

24 **and there was a long process of trying to get help**

25 **for me to be able to pass the class. And she was**

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1 weren't -- or that you were irresponsible. I mean,  
 2 obviously, that viewpoint changed at some point in  
 3 time, did it not?  
 4 **A. Mostly, yes.**  
 5 Q. Okay. Because at some point you got -- you  
 6 got back in the leadership program, right?  
 7 **A. Yes.**  
 8 Q. Okay. So when do you kind of feel like that  
 9 viewpoint of you changed?  
 10 **A. It's hard for me to say because I felt lesser**  
 11 **up until the very end of my junior year, but I was**  
 12 **starting -- I was starting to be asked for**  
 13 **assistance, and I started doing some of the chores**  
 14 **for other people in leadership who were busy when**  
 15 **they had to do them. I started doing that almost**  
 16 **immediately after. So I don't know -- I don't know**  
 17 **if people's views changed sooner or later.**  
 18 Q. Okay. Other than this incident involving the  
 19 band, any other disciplinary issues your sophomore  
 20 year?  
 21 **A. Not to my recollection.**  
 22 Q. Did you have any disciplinary issues during  
 23 your freshman year?  
 24 **A. Not to my recollection.**  
 25 Q. And band is considered an extracurricular

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1 activity; is that right?  
 2 **A. What do you mean by "extracurricular"?**  
 3 Q. Well, I mean, somebody that plays on a sports  
 4 team, that's an extracurricular activity; right?  
 5 **A. Yes.**  
 6 Q. Okay. And band kind of falls within that  
 7 same realm; is that right? You choose to be in the  
 8 band, right?  
 9 **A. Yes, but it also counts for a credit.**  
 10 Q. Right. I understand that -- that you can get  
 11 some credit for being in band; is that right?  
 12 **A. Yes.**  
 13 Q. But not everybody takes band?  
 14 **A. Yes.**  
 15 Q. Well --  
 16 **A. I mean, yeah.**  
 17 Q. -- a poorly worded question on my part. Not  
 18 everybody takes band, do they?  
 19 **A. They don't.**  
 20 Q. It's not required of anybody to take band; is  
 21 that right?  
 22 **A. It's not.**  
 23 Q. And I would assume that band involves a lot  
 24 of out-of-school time as well; is that right?  
 25 **A. Yes.**

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1 Q. Okay. It's my understanding that the band  
 2 directors kind of had a code of conduct that band --  
 3 that members of the band had to sign; is that right?  
 4 **A. Yes.**  
 5 Q. Was that something that they always had, as  
 6 far as you were concerned?  
 7 **A. Yes.**  
 8 Q. Something you signed starting your freshman  
 9 year?  
 10 **A. Starting all the way back in middle school.**  
 11 Q. Oh, okay. And you understood that there were  
 12 certain things you had to follow in order to remain  
 13 a member of the band; is that right?  
 14 **A. Yes.**  
 15 Q. Prior to August 10th of 2022, had you had any  
 16 interaction with Mr. Quick?  
 17 **A. Yes.**  
 18 Q. Okay. What interaction had you had with  
 19 Mr. Quick prior to August 10th of 2022?  
 20 **A. That I remember I -- there was a -- there was**  
 21 **an assembly as an attempt to help calm down the**  
 22 **students who were planning a protest to the dress**  
 23 **code my sophomore year.**  
 24 **This was the first week of school. And he**  
 25 **held an assembly where students could ask questions.**

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1 **And I asked a question that was pretty pointed, well**  
 2 **thought out, and would -- if answered, it would --**  
 3 **it would explain where the school district was**  
 4 **coming from with certain parts of the dress code.**  
 5 Q. Okay. And this was during your sophomore  
 6 year?  
 7 **A. Yes, the first week.**  
 8 Q. Okay. What was -- what was the issue with  
 9 the dress code?  
 10 **A. There were -- there were a few things. There**  
 11 **were parts of it that a large part of the student**  
 12 **body saw as racist, like specifically calling out**  
 13 **that students couldn't wear durags. They couldn't**  
 14 **have bandanas on any part of their body. There**  
 15 **could be no articles of clothing that could suggest**  
 16 **gangs or gang activity, if I remember correctly.**  
 17 **There was the -- there was the regular sexist**  
 18 **point of view that people argued. The biggest issue**  
 19 **that I remember was skirt length -- skirt length**  
 20 **being quantified and teachers being encouraged to**  
 21 **check with like credit cards, I think, to check**  
 22 **students to see if it's within dress code.**  
 23 **And the problem with that -- with the student**  
 24 **body was that they didn't want teachers to be**  
 25 **checking them, and then another problem that was**

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1 smaller was cracking down on ripped jeans. And me  
 2 being -- I'll just say it -- poor, I can't afford  
 3 new jeans. And every single pair that I have except  
 4 for one has rips that would have violated the dress  
 5 code.  
 6 Q. Okay.  
 7 A. And I've never bought any ripped jeans. They  
 8 just end up becoming ripped.  
 9 Q. So what was your question to Mr. Quick?  
 10 A. Essentially, it was just, Why do you think  
 11 that the school district can enact these policies  
 12 that are -- that are discriminatory against parts of  
 13 the student body?  
 14 Q. Okay. Did he respond to your question?  
 15 A. No.  
 16 Q. Did he say why he wasn't going to respond to  
 17 the question?  
 18 A. No.  
 19 Q. He just ignored it and moved on?  
 20 A. Yes.  
 21 Q. Okay. Any other interactions with Mr. Quick  
 22 prior to August 10th of '22?  
 23 A. Yes.  
 24 Q. Okay. What other interactions had you had  
 25 with Mr. Quick?

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1 A. In my Honors Algebra II class, my teacher was  
 2 taking a sick day. So there was a substitute, which  
 3 at the time I didn't know this. She was the Head of  
 4 the Math Department.  
 5 Again, I thought that she was just a  
 6 substitute. And she -- she had rules that I thought  
 7 were overkill and didn't fall in line with the  
 8 student handbook or one of the things that outlines  
 9 rules for the school and also some rights in  
 10 Tennessee.  
 11 So I wrote an e-mail to my teacher. My  
 12 teacher got concerned because of what I was saying  
 13 because she knew that it was the Head of the Math  
 14 Department and from there it eventually made its way  
 15 to Quick.  
 16 And when I got into the office, I had no  
 17 chance to explain what my point of view was or that  
 18 I didn't realize that she was the Head of the Math  
 19 Department because this was my first year actually  
 20 attending school in person. I wasn't able to go to  
 21 the orientation, which would introduce me to all  
 22 these people. And instead of that I was just  
 23 berated the whole time.  
 24 Q. Okay. Berated by Mr. Quick?  
 25 A. Yes.

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1 Q. Any other administrator involved in this  
 2 meeting?  
 3 A. I don't remember.  
 4 Q. I mean, what was Quick saying to you?  
 5 A. Essentially that I was stupid for not knowing  
 6 that she was the Head of the Math Department, and  
 7 that what I said was incredibly disrespectful and he  
 8 wouldn't stand for it.  
 9 Q. Well, if you had known she was the Head of  
 10 the Math Department, would you have still sent the  
 11 e-mail?  
 12 A. Absolutely not because she's a full-time  
 13 teacher, and she has -- she has rules and  
 14 expectations in her own class, and she is the Head  
 15 of the Math Department. Obviously, she knows how to  
 16 do her job.  
 17 Later on I did -- I did apologize to her  
 18 immediately after I was able to, and we got along  
 19 great after that.  
 20 Q. Okay. Now, you said you didn't attend school  
 21 in person your freshman year; is that right?  
 22 A. Yes.  
 23 Q. Why not?  
 24 A. My mother is -- was -- maybe still is  
 25 extremely high risk for COVID, and the school

Page 44

1 district blatantly refused to take precautions that  
 2 would protect people like her.  
 3 Q. Okay. If I'm thinking correctly, you would  
 4 have been in eighth grade when COVID first hit; is  
 5 that right?  
 6 A. Yes.  
 7 Q. I believe it occurred spring of your eighth  
 8 grade year?  
 9 A. Yes.  
 10 Q. Okay. And I'm assuming at that point  
 11 Tullahoma, like a lot of schools across the state,  
 12 went kind of distance learning?  
 13 A. Yeah.  
 14 Q. Okay.  
 15 A. Without the learning.  
 16 Q. Okay. Was that something that was offered  
 17 the following year as well, like could a student opt  
 18 to do distance learning because of COVID?  
 19 A. Yes. That is the option that I took.  
 20 Q. Okay. So that was an option being offered  
 21 district wide?  
 22 A. Yes, but it was executed very poorly.  
 23 Q. Okay. And you had opted to stay home that  
 24 year?  
 25 A. Actually, my mom and I decided originally

Page 45

**1 that it would be best if I tried to stay in school**  
**2 so I could get a decent education.**  
 3 Q. Okay.  
**4 A. But after going for one or two days, I saw**  
**5 just how bad it was and how poorly it was being**  
**6 handled. And she tried to talk to some**  
**7 administration, I think Quick as well, about**  
**8 implementing something that would make her a little**  
**9 more comfortable with having me attend school in**  
**10 person.**  
 11 Q. Okay. Well, why were you saying they were  
 12 handling it poorly when you tried to attend in  
 13 person?  
**14 A. There was no enforcing distancing. There was**  
**15 hardly any encouragement for wearing masks. There**  
**16 was no real accommodation for students who had**  
**17 parents or they themselves were high risk for COVID,**  
**18 like if the students who were in high risk**  
**19 households were separated from the other students**  
**20 and all wore masks, that would be fine, but that**  
**21 didn't happen.**  
 22 Q. Okay. Well, you said after some discussion  
 23 there were things that were done that made your mom  
 24 more comfortable. What things were done?  
**25 A. Nothing. She talked about things that could**

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**1 be done.**  
 2 Q. Oh, okay.  
**3 A. But she was ignored.**  
 4 Q. Okay. And so at that point you opted to then  
 5 stay at home for that year?  
**6 A. Yes.**  
 7 Q. Okay.  
**8 A. Except for band because band was the only one**  
**9 that was able to do anything right.**  
 10 Q. Okay. So I assume then for your academic  
 11 classes you did from home?  
**12 A. Yes.**  
 13 Q. And then your freshman year, did you have  
 14 band as a course like a class?  
**15 A. Yes.**  
 16 Q. Okay. So I assume then you would go to  
 17 school for your band class?  
**18 A. Yes.**  
 19 Q. And then would the marching band practice  
 20 after school?  
**21 A. Yes.**  
 22 Q. And I assume you would stay for band practice  
 23 after school?  
**24 A. Yes.**  
 25 Q. Okay.

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1 MR. FITPATRICK: Is this a good spot --  
 2 we've been going for about an hour -- to take five?  
 3 MR. SELLERS: Sure. Yeah.  
 4 (A short break.)  
 5 BY MR. SELLERS:  
 6 Q. Prior to when we took a break, we discussed  
 7 two interactions with Mr. Quick, one at a school  
 8 assembly regarding the dress code, and one regarding  
 9 an e-mail you sent about the -- the math teacher.  
 10 Any other interactions you had with Mr. Quick prior  
 11 to August 10th of '22?  
**12 A. Not that I remember.**  
 13 Q. Okay. Prior to that date did you harbor any  
 14 ill will towards Mr. Quick?  
 15 MR. FITPATRICK: Object to form.  
**16 THE WITNESS: What do you mean by "ill**  
**17 will"?**  
 18 BY MR. SELLERS:  
 19 Q. Well, I mean -- I mean, did you not like  
 20 Mr. Quick?  
**21 A. I did not.**  
 22 Q. Okay. Why did you not like Mr. Quick?  
**23 A. I felt that there were -- there were**  
**24 practical differences in us with how he operates as**  
**25 an administrator, which I thought were not helpful**

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**1 for the school environment.**  
**2 There were also personal things, like certain**  
**3 interactions with students, like many other students**  
**4 I believed to an extent some of the rumors that were**  
**5 going around about him. And I felt as though his --**  
**6 his personal image and ego got in the way of his job**  
**7 as the principal.**  
 8 Q. Okay. When you say there were practical  
 9 differences in how he operated as an administrator,  
 10 what do you mean by that?  
**11 A. There were -- there were decisions that were**  
**12 made for -- it may not just be the high school, but**  
**13 there were decisions made by the high school that**  
**14 took some of our resources that could have been**  
**15 spent on other things, like better access to**  
**16 electronics for students because at the time that I**  
**17 was there, a good portion of the Chromebooks that we**  
**18 had were outdated.**  
**19 And the WiFi in the school is not great in**  
**20 the slightest, and it's very susceptible to failing.**  
**21 But instead there were just other choices that**  
**22 benefited a small group of people, rather than the**  
**23 student body as a whole.**  
 24 Q. When you say "benefited a small group of  
 25 people", who are you talking about?

1 **A. The best example I can think of off the top**  
 2 **of my head is he bought the -- the choir some**  
 3 **introductory music theory books that introduced very**  
 4 **basic levels of theory.**  
 5 Q. So you disagreed with how he or someone chose  
 6 to allocate resources throughout the school  
 7 sometimes?  
 8 **A. Yes.**  
 9 Q. Okay. Anything else when you say practical  
 10 differences and practical decisions he made as an  
 11 administrator?  
 12 **A. I feel like image was a big part of his ideal**  
 13 **as an administrator. He was very -- he was very**  
 14 **focused on school spirit for sports to the point**  
 15 **where it -- it did take time out of classes that I**  
 16 **would benefit from and I think others would have**  
 17 **benefited from, even if they wouldn't like to admit**  
 18 **it.**  
 19 Q. When you say took time out of class for  
 20 sports, are you talking about like for pep rallies?  
 21 **A. Yes. Normally, pep rallies -- normally pep**  
 22 **rallies would go for like 30 minutes maybe. But at**  
 23 **certain points during my time at Tullahoma, some pep**  
 24 **rallies went for an hour and sometimes an hour and a**  
 25 **half.**

1 Q. Okay. Were the band -- was the band involved  
 2 in pep rallies?  
 3 **A. Yes.**  
 4 Q. Okay. When you say you didn't like his  
 5 interactions with students, what did you mean by  
 6 that?  
 7 **A. There was one time when during the morning**  
 8 **announcements he sniffed a girl's hair over the**  
 9 **intercom and said that she had really nice smelling**  
 10 **hair and then continued to do the rest of the**  
 11 **announcements.**  
 12 **There was another alleged incident where --**  
 13 **while out in the hall with a admittedly problematic**  
 14 **student, he -- he allegedly said, I'm not your N**  
 15 **word. And he said the actual N word.**  
 16 Q. Okay. What else?  
 17 **A. He was very physical with like patting on --**  
 18 **patting people on the backs.**  
 19 Q. Okay.  
 20 **A. Even when they were obviously uncomfortable.**  
 21 Q. Did he ever do that to you?  
 22 **A. Yes.**  
 23 Q. Okay. Did you ask him not to do that?  
 24 **A. I don't remember.**  
 25 Q. Okay. Did he do it to you more than once?

1 **A. Yes.**  
 2 Q. In what context would he do this?  
 3 **A. I suppose as congratulations because I**  
 4 **consistently -- I consistently achieved many good**  
 5 **things on my instrument, like chair placements,**  
 6 **solos, Midstate, All State. I had -- I was in the**  
 7 **Nashville Youth Jazz and I -- I played a few**  
 8 **concerts with them.**  
 9 Q. Okay. So this was an acknowledgment for the  
 10 good job you had been doing in playing your  
 11 instrument?  
 12 **A. I would assume so.**  
 13 Q. Okay. Going back to the incident in the  
 14 hallway regarding him using the N word, was that  
 15 something you had actual knowledge or was that a  
 16 rumor?  
 17 **A. It's -- it's a rumor, but I heard the same**  
 18 **story from multiple people with very minimal change**  
 19 **and one of my friends was a friend of the student**  
 20 **that he said that to.**  
 21 Q. So the student that he allegedly used the N  
 22 word was a friend of a friend of yours?  
 23 **A. Yes.**  
 24 Q. Okay. When did that incident occur?  
 25 **A. My junior year. I'm not sure when.**

1 Q. Okay. Did it happen before the incident  
 2 we're about here -- here today about?  
 3 **A. I don't remember.**  
 4 Q. On August 10th of 2022 what social media  
 5 accounts did you have?  
 6 **A. At that time it was just the one, which**  
 7 **was -- at the time called atom\_heart\_fag. Later it**  
 8 **was changed to pimping P.**  
 9 Q. Okay. And was that an Instagram account?  
 10 **A. Yes.**  
 11 Q. You didn't have any other social media  
 12 accounts at that time?  
 13 **A. None that I had access to or that were active**  
 14 **other than YouTube, which I used explicitly for**  
 15 **watching things and occasionally uploading a video**  
 16 **that was required for an audition or something like**  
 17 **that.**  
 18 Q. Okay. Didn't have Snapchat? Didn't have  
 19 TikTok?  
 20 **A. Not that were active or that I could get**  
 21 **into.**  
 22 Q. Okay. Had you had those accounts in the  
 23 past?  
 24 **A. Yes.**  
 25 Q. Okay. Why -- why do you say that they

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1 weren't active at that time?

2 **A. I never used them.**

3 Q. Okay. What was your username on your TikTok

4 account prior to this?

5 **A. I don't remember.**

6 Q. Did you have a Snapchat account prior to

7 this?

8 **A. Technically, but I couldn't log into it since**

9 **a year before.**

10 Q. Okay. Why not?

11 **A. I forgot the log-in information.**

12 Q. Okay. When did you change your Instagram

13 account name from atom\_heart\_fag to pimping P?

14 **A. I don't remember.**

15 Q. Where did the name atom\_heart\_fag come from?

16 **A. One of my friends from middle school, me and**

17 **her bonded over a shared liking of Pink Floyd. And**

18 **at the time my favorite album was Atom Heart Mother,**

19 **and the fag comes from me being bisexual so...**

20 Q. Because the word fag is usually meant as a

21 derogatory term for somebody that's homosexual; is

22 that right?

23 **A. Typically but people -- people in the LGBTQ**

24 **plus community have started to use it amongst**

25 **themselves.**

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1 Q. Okay. How long had you had that account at

2 that time?

3 **A. I don't remember.**

4 Q. Did you have it during your sophomore year of

5 high school?

6 **A. Yes.**

7 Q. Okay. Had you had it during your freshman

8 year of high school?

9 **A. Yes.**

10 Q. So you had it at least a year and a half, two

11 years at that point?

12 **A. Yes.**

13 Q. Okay. Had you had Instagram accounts under

14 any other names at that point?

15 **A. No, not at that point.**

16 Q. Okay. Well, had you had other Instagram

17 accounts under different names prior to August 10th?

18 **A. Not that I can remember.**

19 Q. Okay. I've passed you, I guess, a picture.

20 Can you describe what that picture shows?

21 MR. FITPATRICK: And briefly I'll place

22 a running objection as to this line of questioning

23 based on the Supreme Court's decision in Bremerton

24 related to material that did not form the basis of a

25 suspension. That issue has already been briefed.

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1 Andrew, I don't want to interrupt all of

2 your questions. I'll just place a running objection

3 --

4 MR. SELLERS: Okay.

5 MR. FITPATRICK: -- and we can go on --

6 on our way.

7 BY MR. SELLERS:

8 Q. All right.

9 **A. It is a black and white picture of the KKK**

10 **with a burning cross and Quick edited onto it with**

11 **the text "pablo".**

12 Q. Okay. On August 10th, 2022, was this meme on

13 your Instagram account?

14 **A. No.**

15 Q. Prior to August 10th of 2022, had you seen

16 this meme?

17 **A. I think so.**

18 Q. How had you seen that meme?

19 **A. My friend made it.**

20 Q. Okay. Who was your friend?

21 **A. N.M.**

22 Q. How did you see it or where did you see it?

23 **A. We shared a lunch table.**

24 Q. Okay. So did he like hold up his phone and

25 show it to you?

Page 56

1 **A. I don't entirely remember, but that seems**

2 **like -- that seems like it.**

3 Q. Okay. At any point in time has this meme

4 been on your Instagram page?

5 **A. No.**

6 Q. If somebody testifies that when they pulled

7 up your Instagram account that they saw this meme on

8 your account, how would you explain it being on

9 there?

10 MR. FITPATRICK: Object to form.

11 **THE WITNESS: Well, it was not on there**

12 **and there is -- my Instagram has been backed up, and**

13 **it shows that it's not been on there, not in DMs,**

14 **not in posts, not stories, nothing.**

15 BY MR. SELLERS:

16 Q. Okay. When you say it's been backed up, what

17 do you mean?

18 **A. All of the data from my Instagram account has**

19 **been downloaded and given to my counsel.**

20 Q. Okay. So it's your position this meme was

21 never on your Instagram account?

22 **A. Yes.**

23 MR. SELLERS: Let's mark that as Exhibit

24 Number 1 subject to the objection.

25 (WHEREUPON, a document was marked as

Page 57

1 Exhibit Number 1.)

2 BY MR. SELLERS:

3 Q. Had you and N.M. had any conversations about

4 that meme?

5 **A. Not to my recollection.**

6 Q. Okay.

7 **A. Wait. No. I remember -- I remember a**

8 **passing remark that it would be a good album cover.**

9 Q. Okay. When was that made? Like when you

10 first saw it or --

11 **A. When was the remark made?**

12 Q. Yeah.

13 **A. Yes, when I first saw it.**

14 Q. Okay. And had you seen this meme before you

15 were called into the office?

16 **A. Maybe. I don't remember.**

17 Q. Okay. Did you ever have any conversation

18 with N.M. about why he created that meme?

19 **A. Not really.**

20 Q. Okay. I'm going to hand you another

21 document. Can you tell me what that shows?

22 MR. FITPATRICK: Real quick. The same

23 running objection to this exhibit.

24 **THE WITNESS: It's a picture of Hitler**

25 **with Quick edited on.**

Page 58

1 BY MR. SELLERS:

2 Q. Okay. At any point in time was this meme on

3 your Instagram feed?

4 **A. No.**

5 Q. Did you ever see this meme?

6 **A. I don't remember.**

7 Q. Okay. Well, I assume you've seen it since

8 the lawsuit has been filed --

9 **A. Well, yes --**

10 Q. -- right?

11 **A. -- since the lawsuit and since it was shown**

12 **to me in Mr. Quick's office.**

13 Q. Okay.

14 **A. But prior to that, no, or not that I**

15 **remember.**

16 Q. Okay. So the first time you recall seeing it

17 was when you were in Mr. Quick's office?

18 **A. Yes.**

19 Q. Do you know who created this meme?

20 **A. I do not.**

21 Q. After being called into Mr. Quick's office,

22 did you ever see it on anybody's Instagram account?

23 **A. No.**

24 MR. SELLERS: Okay. Let's mark that as

25 Exhibit 2 for ID.

Page 59

1 (WHEREUPON, a document was marked for

2 identification as Exhibit Number 2.)

3 BY MR. SELLERS:

4 Q. Did anyone else have access to your Instagram

5 account in August of 2022?

6 **A. What do you mean by "access"?**

7 Q. Like did somebody have your username and

8 password where they could go onto your Instagram

9 account and post anything?

10 **A. Not to my knowledge.**

11 Q. Okay. Never gave any of your friends your

12 password or anything?

13 **A. No.**

14 Q. Okay. So you were the only person that had

15 access to that account in August of 2022?

16 **A. To my -- to my knowledge, yes.**

17 Q. I've handed you another document. Can you

18 tell me what that shows?

19 **A. It shows a picture of Mr. Quick with cat ears**

20 **edited on, with whiskers, a star on his nose, a**

21 **heart filter with sparkles, a maid outfit, the**

22 **"Nya", which is the sound a cat makes, and the words**

23 **"Neko quick".**

24 Q. Okay. On August 10th of '22, was that meme

25 on your Instagram feed?

Page 60

1 **A. Yes.**

2 Q. Did you post it to your Instagram page?

3 **A. Yes.**

4 Q. When did you post it on your Instagram page?

5 **A. I don't remember the date right now.**

6 Q. Approximately how long had it been on your

7 Instagram page before August 10th of '22?

8 **A. Well, I posted it when I was in Italy. So it**

9 **was in the middle of summer break.**

10 Q. Did you create this meme?

11 MR. FITPATRICK: Object to form.

12 **THE WITNESS: I didn't create it, but I**

13 **did add the words "Neko quick".**

14 BY MR. SELLERS:

15 Q. Okay. Where did you get the meme from?

16 **A. One of my friends.**

17 Q. Okay. Was that something they had posted on

18 their Instagram?

19 **A. I don't think so.**

20 Q. Okay. Well, how did you see it originally?

21 **A. I don't remember. I think it was sent to me.**

22 Q. From who?

23 **A. I don't remember.**

24 Q. You don't remember who -- you said one of

25 your friends. You don't remember what friend sent

Page 61

1 it to you?

2 **A. I get sent a lot of things by different**

3 **people.**

4 Q. Okay. I mean, how did you receive it?

5 E-mail? Text?

6 **A. I don't remember.**

7 Q. Do you know when you received it?

8 **A. No.**

9 Q. Okay. What does "Neko quick" mean?

10 **A. Well, Neko is to my knowledge -- to my**

11 **knowledge at the time it meant a person with cat**

12 **like features, like the cat ears, a tail, whiskers,**

13 **and Quick is his last name.**

14 Q. Okay. Why did you post this?

15 **A. Because it's funny to see my principal at the**

16 **time who presents himself as masculine and hardly**

17 **feminine at all, if at all. It's funny to see him**

18 **in contrast with typically feminine things edited**

19 **on.**

20 Q. And you say that the "Nya" was already on

21 there when you received it?

22 **A. Yes.**

23 Q. Other than adding the "Neko quick", did you

24 alter or change the image that you received in any

25 way?

Page 62

1 **A. No.**

2 Q. And you're saying somebody sent this to you,

3 not that you went out and saw it and actively pulled

4 it off somewhere?

5 **A. Well, I don't entirely remember; but I think**

6 **that's probably what happened.**

7 Q. Okay. Probably somebody sent it to you?

8 **A. Yes.**

9 MR. SELLERS: Let's make that Exhibit

10 Number 3.

11 (WHEREUPON, a document was marked as

12 Exhibit Number 3.)

13 BY MR. SELLERS:

14 Q. What was your purpose in posting that?

15 **A. It's silly. It's satirizing his -- the way**

16 **that he presents himself as masculine.**

17 Q. Okay. Why did you add the "Neko quick" to

18 it?

19 **A. I guess it would be so that I didn't feel**

20 **like I was just stealing it, so I was adding**

21 **something, and also it just felt funny to add.**

22 Q. Okay. Where does that come from, "Neko"?

23 MR. FITPATRICK: Object to form.

24 BY MR. SELLERS:

25 Q. Where -- where do you know it from?

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1 **A. Well, I knew it from memes about anime in**

2 **Japan in general.**

3 Q. Okay. I'll hand you another document. Can

4 you tell me what that shows?

5 **A. It's a picture of Quick holding a box of**

6 **vegetables with googly eyes that was screenshotted**

7 **from a friend of mine and someone who graduated a**

8 **couple of years before me.**

9 **It was screenshot from their Instagram story,**

10 **and they added the text "My Brotha" with two fire**

11 **emojis, an "Add yours" sticker of "like a sister but**

12 **not a sister" and the words "On god".**

13 Q. Who was this friend?

14 **A. N.A.**

15 Q. Can you spell that last name for me?

16 **A. I don't remember how it's spelled. I think**

17 **it's (spells last name.)**

18 Q. Okay. So she had screenshotted that picture

19 or did you screenshot it?

20 MR. FITPATRICK: Objection to form.

21 **THE WITNESS: I screenshotted it from**

22 **her Instagram story.**

23 BY MR. SELLERS:

24 Q. Okay.

25 **A. I don't know how she got it.**

Page 64

1 Q. Okay. And did you have this posted on your

2 Instagram on August 10th, 2022?

3 **A. Yes.**

4 Q. Okay. So if somebody went to your Instagram

5 account, they would see this posted; is that right?

6 **A. Yes.**

7 Q. Okay. And you're saying to your knowledge

8 when you screenshotted it, it already had the "My

9 Brotha" on it?

10 **A. It did already have that on it.**

11 Q. Okay. And did it also have the "On god"

12 already on it?

13 **A. No, I added that.**

14 Q. Okay. What does that mean?

15 **A. "On god"?**

16 Q. Yeah.

17 **A. It's slang for sort of asserting the truth of**

18 **something, like I put that on God saying that it's**

19 **not a lie or that it's the truth or something like**

20 **that.**

21 Q. Okay. What were you referencing by putting

22 that on this picture? I mean, why did you put it on

23 there?

24 **A. Irony because the "like a sister but not a**

25 **sister" -- and anyone who knows me knows that I'm**

**1 not particularly fond of him, so I don't have that**  
**2 familial bond with him.**  
 3 Q. Okay. Was the "like a sister but not a  
 4 sister" already on this picture when you posted it  
 5 to your Instagram?  
**6 A. No. Oh, did you mean before I posted it?**  
 7 Q. Well, let me ask it this way. Did you add  
 8 the "like a sister but not a sister"?  
**9 A. Yes.**  
 10 Q. Okay. And what does that mean?  
**11 A. It means like you have a very close bond with**  
**12 someone, like a friend, so that they're like a**  
**13 sibling. In this case it would be a sister, but**  
**14 you're not bound by blood so it's not a sister.**  
 15 Q. Why didn't you say "like a brother but not a  
 16 brother"?  
**17 A. Because I didn't make the -- I didn't make**  
**18 the sticker.**  
 19 Q. Okay. Where did the sticker come from?  
**20 A. It's a function on Scram called Add Yours**  
**21 where someone can create a prompt and other people**  
**22 can use that prompt to add -- to add theirs -- to**  
**23 add their -- in this case a lot of people would have**  
**24 posted pictures of their best friends or -- I don't**  
**25 know -- a friend.**

1 Q. Okay. But on hers it may have done that?  
**2 A. Yes.**  
 3 Q. Okay. Did you see it on hers?  
**4 A. I don't remember but I probably did.**  
 5 Q. Well, how did you screenshot it off her  
 6 Instagram?  
**7 A. By pressing the two buttons on my phone that**  
**8 takes screenshots.**  
 9 Q. Well, okay, so you saw it on her Instagram  
 10 feed?  
**11 A. I suppose so.**  
 12 Q. Well, that's what I'm trying to --  
**13 A. I thought you were talking about Gangsta's**  
**14 Paradise, not the post itself.**  
 15 Q. No. I'm talking about the post. I mean, you  
 16 obviously saw it on her Instagram feed and  
 17 screenshotted it; right?  
**18 A. Yes.**  
 19 Q. That's how you came in possession of it?  
**20 A. Yes.**  
 21 Q. And then you edited it with -- by adding "On  
 22 god" and "like a sister but not a sister"; is that  
 23 right?  
**24 A. Yes.**  
 25 Q. Okay. What does the less than and three mean

1 Q. Okay. So like they could -- they could post  
 2 a picture of their best friend, and then they could  
 3 go and take this sticker and put it on that picture?  
**4 A. Yes.**  
 5 Q. Okay.  
**6 A. And for me it was just irony.**  
 7 Q. In what way?  
**8 A. Because we do not have a bond.**  
 9 Q. Okay. Well, is there a reason you chose a  
 10 sticker that uses "sister"?  
**11 A. No. Other than I just didn't -- the way that**  
**12 these work is they sort of spread from other people**  
**13 adding theirs, and they see the sticker and then**  
**14 they -- the people who view that story can then add**  
**15 theirs.**  
 16 Q. Okay.  
**17 A. That's how the sticker spreads. And that's**  
**18 how I came across it.**  
 19 Q. Do you know why at the top of this it says,  
 20 "Coolio - Gangsta's Paradise"?  
**21 A. That was music that was posted along with it**  
**22 by N.A.**  
 23 Q. So when you would pull this up, there would  
 24 be music playing with it?  
**25 A. Not on my profile.**

1 on that sticker?  
**2 A. That just resembles a heart to show that like**  
**3 -- to emphasize even more that there's that bond.**  
 4 Q. Okay. Do you know what was originally under  
 5 that sticker?  
**6 A. The top of the box with the vegetables in it.**  
 7 Q. Did it say something like April's Fools Day  
 8 or Happy April's Fools Day?  
**9 A. I think so.**  
 10 Q. Okay. Has anything else changed about this  
 11 picture than what it was posted on N.A.'s account?  
**12 A. No.**  
 13 MR. SELLERS: Let's make Number 4.  
 14 (WHEREUPON, a document was marked as  
 15 Exhibit Number 4.)  
 16 BY MR. SELLERS:  
 17 Q. Let me show you another. Can you tell me  
 18 what that picture shows?  
**19 A. It shows Quick's head edited onto a poorly**  
**20 drawn character from the game Among Us, and he is**  
**21 being -- his leg is being held by Mordecai, the bird**  
**22 from Regular Show, who is crying and saying, "Nooo**  
**23 Jason Don't Leave Me".**  
 24 Q. Okay. On August 10th of 2022 was that meme  
 25 on your Instagram feed?

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1 **A. Yes.**  
 2 Q. Okay. How did it get on your Instagram page?  
 3 **A. I posted it.**  
 4 Q. Okay. Do you know how long it had been on  
 5 your Instagram page in relation to August 10th?  
 6 **A. It was posted on the second.**  
 7 Q. Okay. August 2nd?  
 8 **A. Yes.**  
 9 Q. Why do you remember it was posted on August  
 10 2nd?  
 11 **A. It's the easiest date that I could remember.**  
 12 **I looked yesterday, but I forgot the other two.**  
 13 Q. Okay.  
 14 **A. And this one was the -- this is the easiest**  
 15 **to remember because it was in the same month.**  
 16 Q. Okay. Did you create that?  
 17 **A. Only partially.**  
 18 Q. Okay. What part of that did you create?  
 19 **A. I added Mordecai crying and the caption.**  
 20 Q. Okay. Where did you see the drawing with his  
 21 face on it?  
 22 **A. I don't remember, but it was -- it was one of**  
 23 **my friends.**  
 24 Q. Okay. Was that -- was it something they had  
 25 posted on their Instagram?

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1 **A. I don't remember.**  
 2 Q. Well, I mean, where did you get it from?  
 3 **A. I don't remember whether it was a story or**  
 4 **whether it was a DM, but it was one of my friends.**  
 5 Q. Okay. Who was your friend?  
 6 **A. I think this came from E.P.**  
 7 Q. Was she a student at Tullahoma High School?  
 8 **A. Yes.**  
 9 Q. In the same grade as you or --  
 10 **A. No. I think she's a year younger.**  
 11 Q. Okay. Did you remove anything off of that --  
 12 that was on her post?  
 13 **A. No. That's exactly how I saw it.**  
 14 Q. It was just -- just the drawing with the face  
 15 on it?  
 16 **A. Yes.**  
 17 Q. Okay. What is the meaning behind that post?  
 18 **A. Well, the way I thought of it when I made it**  
 19 **and posted it was Mordecai and -- Mordecai and Quick**  
 20 **have a very close bond. And Quick is leaving, and**  
 21 **Mordecai is pleading with him to not stay -- stay**  
 22 **and he's very distraught because they have a very**  
 23 **close bond.**  
 24 Q. Why is that funny?  
 25 **A. The absurdity of Mordecai from a childhood**

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1 **show of mine and Quick, who is an -- an Among Us**  
 2 **character. It's just absurd.**  
 3 Q. Okay. What is Among Us?  
 4 **A. It's -- it's a game that was popular at the**  
 5 **time. It's a social deduction game where there's a**  
 6 **majority of people who -- whose goal, I guess, is to**  
 7 **figure out who isn't a member of that group, single**  
 8 **them out, and one by one -- well, get rid of them so**  
 9 **that they are only those ones left. And then the**  
 10 **other team called the imposters has to -- has to**  
 11 **kill all the crewmates before they all get removed.**  
 12 Q. Okay. I mean, do you know why somebody had  
 13 drawn this character and posted his head on it?  
 14 **A. I don't know why.**  
 15 Q. Okay. Why is there a space in the word  
 16 "leave"?  
 17 **A. It's just something funny that -- it's just**  
 18 **something I thought was funny because some --**  
 19 **sometimes I see like written texts that has spaces**  
 20 **in between words where there's not normally a space,**  
 21 **and I just think that's funny.**  
 22 MR. SELLERS: Let's make that Number 5.  
 23 (WHEREUPON, a document was marked as  
 24 Exhibit Number 5.)  
 25 //

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1 BY MR. SELLERS:  
 2 Q. Let me show you another document. Now, this  
 3 was something produced to us in your document  
 4 production, Number 671. And this appears to be --  
 5 and you can correct me if I'm wrong -- the same meme  
 6 we were just talking about; is that right?  
 7 **A. Yes.**  
 8 Q. Okay. But on this it has your Instagram name  
 9 and a caption that says, "I made this"?  
 10 **A. Yes.**  
 11 Q. Where did this come from?  
 12 **A. This is a story post.**  
 13 Q. Okay.  
 14 **A. Just the original post was a regular post**  
 15 **that would just show up normally on a feed. And**  
 16 **this uses the story function and me just putting it**  
 17 **out there for potentially more of my followers to**  
 18 **see --**  
 19 Q. Okay.  
 20 **A. -- because a lot of times some of the**  
 21 **followers of mine don't see posts.**  
 22 Q. Okay. Did you put it on your story at the  
 23 same time you would have posted it on your page?  
 24 **A. Yes.**  
 25 MR. SELLERS: Okay. Let's make that

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1 Q. Whose office did you go to?

2 **A. Mr. Quick's.**

3 Q. Okay. Who was in the office when you

4 arrived?

5 **A. If I remember correctly, it was Quick and**

6 **Crutchfield.**

7 Q. Okay. Did Mr. Scott stay?

8 **A. Yes, at least for the first little while.**

9 Q. Okay. Tell me what happens. You and

10 Mr. Scott arrive at Mr. Quick's office.

11 Mr. Crutchfield is there. What happened?

12 **A. Some parts are somewhat fuzzy, but I'm sat**

13 **down and Quick asks Mr. Scott to read a highlighted**

14 **portion of the band's code of conduct, which**

15 **supposedly I had broken.**

16 Q. Okay.

17 **A. It was a -- it was social media conduct**

18 **section of the code of conduct.**

19 Q. For the band?

20 **A. Yes.**

21 Q. Okay.

22 **A. And then -- and then he had me read, I**

23 **think -- he had me read a segment of the student**

24 **handbook, which supposedly had a rule that I broke,**

25 **and then I was -- I was shown the three memes that I**

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1 **had posted on my story and I --**

2 Q. And I'm not meaning to interrupt you, but

3 just for clarification. You were saying the three

4 memes that you had posted, we're talking about the

5 "Neko quick", the him holding the box of vegetables,

6 and the Among Us?

7 **A. Yes.**

8 Q. Sorry. Go ahead.

9 **A. Excuse me. I don't remember what all he**

10 **said, but I do remember he said, What do you think**

11 **my kids would think of this? And I was confused**

12 **because a lot of parents and teachers would join --**

13 **join someone in laughing at these because they're**

14 **silly. And then he showed me the two others that I**

15 **had not posted on my story or any time, and I only**

16 **got more confused.**

17 **He insisted that I had made both of them and**

18 **posted both of them, and I tried to -- I tried to**

19 **interject and say that I didn't, but he would not**

20 **listen.**

21 **He -- he kept insisting that I made them and**

22 **that what I did was wrong. And then before I had**

23 **any chance to further say that I was not the one**

24 **that distributed them or made them, he sent me into**

25 **Crutchfield's office.**

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1 Q. During the meeting in Mr. Quick's office,

2 other than Mr. Scott reading you a portion of the

3 band code of conduct, did Mr. Scott say anything

4 else?

5 **A. Not that I remember.**

6 Q. Okay. During the meeting in Mr. Quick's

7 office, did Mr. Crutchfield say anything?

8 **A. Not that I remember.**

9 Q. So during the meeting in Mr. Quick's

10 office -- the only person other than Mr. Scott

11 reading the code of conduct, the only person

12 speaking was Mr. Quick?

13 **A. As I remember, yes.**

14 Q. Okay. And nobody else was present other than

15 the individuals we talked about?

16 **A. Yes.**

17 Q. Was there any conversation amongst Mr. Quick

18 and Mr. Scott?

19 **A. What do you mean by "conversation"?**

20 Q. I mean, was there just -- was anything said

21 between the two of them during that conversation

22 other than him telling Scott to read the code of

23 conduct for the band?

24 **A. Not that I remember.**

25 Q. Okay. Was there any conversation between

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1 Quick and Crutchfield about the issue?

2 **A. I don't remember.**

3 Q. Okay. So then Mr. Quick sends you and

4 Mr. Crutchfield to Mr. Crutchfield's office?

5 **A. Yes.**

6 Q. Okay. Did anybody else go with you and

7 Mr. Crutchfield to Mr. Crutchfield's office?

8 **A. I don't think so.**

9 Q. Okay. So once you go into Mr. Crutchfield's

10 office, what is the conversation there?

11 **A. Before I -- we had had a chance to situate**

12 **myself, I was told that I had a five-day suspension**

13 **out of school with very little explanation, if any,**

14 **as to why I had that punishment at all.**

15 Q. Well, did you tell Mr. Crutchfield that you

16 had not posted the KKK meme?

17 **A. I intended to when I was walking into his**

18 **office because I thought that he would be more**

19 **reasonable than Quick. But before I had any chance**

20 **to, the suspension notice, it sent me into a panic.**

21 Q. Okay. Well, how much time do you think

22 passed between you getting in Mr. Crutchfield's

23 office and you began having an anxiety attack?

24 **A. Maybe a minute or two.**

25 Q. Okay. When you say you had a panic attack or

1 panic set in -- well, strike that. Prior to that  
 2 occurring did you say anything to Mr. Crutchfield?  
 3 **A. Prior to going into his office?**  
 4 Q. Yes.  
 5 **A. Not that I remember. I was waiting until we**  
 6 **were in his office.**  
 7 Q. Okay. And once you went into his office, did  
 8 you say anything to Mr. Crutchfield?  
 9 **A. No. I didn't get the chance to before he**  
 10 **began talking.**  
 11 Q. Okay. And what he told you was you were  
 12 getting a five-day out-of-school suspension?  
 13 **A. Yes.**  
 14 Q. Did he -- did he say anything else?  
 15 **A. Not that I remember other than maybe a mild**  
 16 **description of why.**  
 17 Q. Okay. What did he tell you?  
 18 **A. Again, I don't entirely remember because I**  
 19 **was in a state of panic. But if he was to say**  
 20 **anything, it would have been, You're getting**  
 21 **suspended because of these five memes.**  
 22 Q. Okay. When you say you were in a state of  
 23 panic, describe that for me.  
 24 **A. Well, it started with no -- I wasn't able to**  
 25 **catch any specific thought to be able to say**

1 **A. A typical breakdown. I started -- I started**  
 2 **not being able to think clearly, maybe I started to**  
 3 **hyperventilate, then I would start moving either**  
 4 **very quickly and rigidly or sluggishly.**  
 5 Q. That's what had happened in the past?  
 6 **A. Yes, typically.**  
 7 Q. Okay. Okay. How often would you have these  
 8 attacks?  
 9 **A. Well, it depends. If circumstances were**  
 10 **good -- from my freshman year to before that point,**  
 11 **maybe once every couple of months but --**  
 12 Q. Okay.  
 13 **A. -- often circumstances weren't like that, so**  
 14 **it ended up being three or four times a month.**  
 15 Q. Say that one more time. I don't think I  
 16 understood you.  
 17 **A. If the circumstances in my life were going**  
 18 **well, then I would have an episode like that maybe**  
 19 **once every couple of months. But oftentimes things**  
 20 **in my life weren't going very well, and if that was**  
 21 **the case, then it could be three or four times a**  
 22 **month.**  
 23 Q. When did you last have an episode before  
 24 August 10th of '22?  
 25 **A. I don't remember.**

1 anything, and then I started taking in way more air  
 2 than I was breathing out.  
 3 **Shortly after that my body started to stiffen**  
 4 **up, and then shortly after that my muscles and**  
 5 **joints began to contract with my hand forming a very**  
 6 **distorted claw. I was slipping down the chair and**  
 7 **wasn't able to correct myself.**  
 8 I was -- I was drooling some. There was snot  
 9 running out of my nose. There was uncontrollable  
 10 crying. I'm pretty sure that people thought that I  
 11 had like passed out or was unconscious, but I was  
 12 conscious for every second of it.  
 13 **And I felt everything including the pain in**  
 14 **my wrists and my back and how I was slipping out of**  
 15 **the chair but couldn't do anything to pick myself**  
 16 **back up. And all I could do was wait. And it was**  
 17 **even worsened when the thought came that the**  
 18 **suspension would probably get me kicked out of band,**  
 19 **which was the only path I had set for.**  
 20 Q. Had you had episodes like this before this  
 21 date?  
 22 **A. Never to the extent that I couldn't function.**  
 23 Q. Okay. Well, what had happened in the past?  
 24 If you had an episode, kind of describe for me what  
 25 you had had in the past?

1 Q. Okay. Well, I would assume that August 10th  
 2 was near the beginning of the school year?  
 3 **A. Yes.**  
 4 Q. Okay. Do you know whether you had had an  
 5 episode during that school year?  
 6 **A. No. It was at the very beginning of -- of**  
 7 **it. So I hadn't had too much time to be overwhelmed**  
 8 **by school, and the only thing that was really there**  
 9 **to overwhelm me was band, which never has.**  
 10 Q. Okay. Well, you said that when circumstances  
 11 weren't going well, sometimes you would have three  
 12 or four of these a month. When you say -- what do  
 13 you mean? What would kind of trigger? What types  
 14 of things would trigger these episodes?  
 15 **A. My home life with my brother or my mom's**  
 16 **health or maybe my dad, maybe I'm just having a**  
 17 **depressive episode, one of my friends is going**  
 18 **through something.**  
 19 **At the time I was invested in current events**  
 20 **and politics. So if I saw something that was**  
 21 **upsetting then, I could -- I could aid it. Really**  
 22 **just negativity in general.**  
 23 Q. Okay. Once you started having this episode,  
 24 what was Crutchfield's reaction?  
 25 **A. He didn't know what to do.**

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1 **A. She was going to take me to Vanderbilt.**  
 2 Q. Okay. Well, you say "Vanderbilt" and that  
 3 encompasses several different hospitals, so that's  
 4 why --  
 5 **A. The one in Nashville.**  
 6 Q. I'm sorry. I mean, there's Vanderbilt  
 7 University Medical Center. There's Vanderbilt  
 8 Children's Hospital. Where do you -- where was she  
 9 planning to take you?  
 10 **A. I don't know. All I know is Vanderbilt.**  
 11 Q. So she was going to take you to the ER at  
 12 Vanderbilt?  
 13 **A. Yeah.**  
 14 Q. Had you been seen at Vanderbilt in the past?  
 15 **A. Yes.**  
 16 Q. Okay. Why had you been seen at Vanderbilt in  
 17 the past?  
 18 **A. I had a -- I had a fracture on my tibia, I**  
 19 **think. And the hospital around here wasn't able to**  
 20 **tell if it was -- if it was as bad as it looked**  
 21 **because they weren't able to get a good enough look,**  
 22 **so they recommended that we go to Vanderbilt.**  
 23 Q. Okay. Did they refer you to the hospital in  
 24 Nashville?  
 25 **A. If I remember correctly, yes.**

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1 Q. Okay. It's like you kind of referred  
 2 earlier. There's various Vanderbilt clinics I know  
 3 around.  
 4 **A. Even the one in Tullahoma.**  
 5 Q. Okay. So you had been to the Vanderbilt  
 6 hospital in Nashville regarding your tibia?  
 7 **A. Yes, if I remember correctly.**  
 8 Q. Okay. Other than that incident, had you been  
 9 treated at Vanderbilt for anything previously?  
 10 **A. Not that I remember.**  
 11 Q. Okay. Do you know why your mother was going  
 12 to take you to Vanderbilt in Nashville?  
 13 **A. It's to do with the quality of care that they**  
 14 **offer there.**  
 15 Q. Okay. Because Nashville is approximately an  
 16 hour away from here; is that about right?  
 17 **A. Yeah.**  
 18 Q. Okay. Okay. So you're at home. You're  
 19 sitting in the car. Your mother's inside the house.  
 20 What happens then?  
 21 **A. She comes back out to check on me, seeing if**  
 22 **the dogs helped, seeing if I can respond at all, and**  
 23 **at that point I started being able to talk a little.**  
 24 Q. Okay.  
 25 **A. She asked if I think that we should wait for**

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1 **a little while to see if my condition got better.**  
 2 **And when I say "wait", I mean like 30 minutes to an**  
 3 **hour and if it wasn't --**  
 4 Q. Okay.  
 5 **A. -- still getting better by then, then we were**  
 6 **going to go to a hospital.**  
 7 Q. Okay.  
 8 **A. Probably the one in Vanderbilt. And then she**  
 9 **asked if I could move, and I wasn't able to just**  
 10 **yet.**  
 11 Q. Okay.  
 12 **A. So we -- we continued to talk. I don't**  
 13 **remember about what for a little while longer, and**  
 14 **then she went back inside to continue packing and**  
 15 **told me to call her if anything happens.**  
 16 Q. Okay. So at this point you're still sitting  
 17 in the car in the driveway?  
 18 **A. Yes.**  
 19 Q. Okay. How long do you think you sat in the  
 20 car in the driveway -- well, strike that. I'm  
 21 assuming at some point you moved from the car?  
 22 **A. Yes. I called my mom to help me in.**  
 23 Q. How long do you think you were sitting in the  
 24 car before you went into the house?  
 25 **A. It's hard to tell.**

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1 Q. Okay.  
 2 **A. It felt -- it felt like a very long time, but**  
 3 **I don't think that it was in reality.**  
 4 Q. Okay. So did you end up going to see any  
 5 medical provider that day?  
 6 **A. No. I was -- I was able to recover enough**  
 7 **that I was able to do everything that I normally**  
 8 **could do on a basic level.**  
 9 Q. About what time do you believe it was that  
 10 day when you were able to get back to basic level?  
 11 **A. I think around 8:00, 8:30 at night.**  
 12 Q. Okay. On August 10th were you on any  
 13 medication for your anxiety?  
 14 **A. As far as I remember, I think the only one**  
 15 **that I was on that day was Clonidine.**  
 16 Q. Okay.  
 17 **A. Which is primarily a sleep drug.**  
 18 Q. Okay. Well, prior to that day had you been  
 19 on any medication for anxiety?  
 20 **A. I don't know if I was prescribed it yet, but**  
 21 **maybe Propanolol.**  
 22 Q. Okay.  
 23 **A. For just as needed things.**  
 24 Q. Once you were prescribed the Propanolol, did  
 25 you keep that with you?

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1 hour since our last break, so let's do five.  
 2 MR. SELLERS: Okay.  
 3 (Short break.)  
 4 BY MR. SELLERS:  
 5 Q. What current social media accounts do you  
 6 have?  
 7 **A. The ones that I'm active on are Pimping P.**  
 8 Q. Okay.  
 9 **A. P. Practicing. I currently have a TikTok**  
 10 **that I can't remember the name of.**  
 11 Q. Not for much longer.  
 12 **A. Yeah.**  
 13 MR. FITPATRICK: Not if the Supreme  
 14 Court listens to FIRE's Amicus brief.  
 15 **THE WITNESS: And the -- the YouTube**  
 16 **account that I -- and the YouTube account that I**  
 17 **just use to watch and occasionally post videos.**  
 18 BY MR. SELLERS:  
 19 Q. Okay. What's the TikTok account name?  
 20 **A. I don't remember. I'm hardly on it.**  
 21 Q. Okay. What's the YouTube account?  
 22 **A. It's I.P. followed by a bunch of numbers.**  
 23 Q. Okay. The meme where he's holding the box of  
 24 vegetables, when did you post that on your Instagram  
 25 account?

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1 **A. I don't remember the exact date. I think it**  
 2 **was either May or March. One of the months with the**  
 3 **"Nya", but it was -- it was after school had let out**  
 4 **for the year.**  
 5 Q. Okay. So, well, you're still in school in  
 6 March; right?  
 7 **A. I don't remember. My whole philosophy for**  
 8 **school was, Don't keep track of the time.**  
 9 Q. Okay. So you're saying it was after school  
 10 let out the previous year?  
 11 **A. Yes.**  
 12 Q. Were there any transgender students at  
 13 Tullahoma that you know of your junior year?  
 14 **A. I know that there were. I can't name them**  
 15 **all off the top of my head.**  
 16 Q. Okay. Were there students at Tullahoma High  
 17 School that would wear clothing typically associated  
 18 with the opposite sex from what they were?  
 19 **A. Yes.**  
 20 Q. Okay. Did you think posting a meme of  
 21 Mr. Quick in a maid outfit could be construed as  
 22 demeaning to those students?  
 23 MR. FITPATRICK: Object to form.  
 24 **THE WITNESS: I think that the only way**  
 25 **it could be considered demeaning is if it wasn't**

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1 **satirizing his over masculinity.**  
 2 BY MR. SELLERS:  
 3 Q. Just so I'm clear, at the time of the  
 4 incident on August 10th of 2020 [sic], were you  
 5 seeing any other medical professional other than  
 6 Tullahoma Pediatrics for your anxiety and  
 7 depression?  
 8 **A. I can't remember.**  
 9 Q. Other than all the ones we've gone through  
 10 today, were there any other messages or text  
 11 exchanges that you recall with anyone regarding the  
 12 incident on August 10th?  
 13 **A. Not that I can remember.**  
 14 Q. Okay. Did you ever receive any negative  
 15 attention from anyone because of the memes?  
 16 MR. FITPATRICK: Object to form.  
 17 **THE WITNESS: It depends what you would**  
 18 **consider negative.**  
 19 BY MR. SELLERS:  
 20 Q. What would you consider negative?  
 21 **A. People taking too much of my time, asking**  
 22 **things that have already been widely known as either**  
 23 **not happening or happened.**  
 24 Q. Meaning what?  
 25 **A. People continuously asking about whether it**

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1 **was me that the lawsuit was about, that sort of**  
 2 **thing.**  
 3 Q. I mean, did -- did it bother you that people  
 4 were asking you if it was you that was the subject  
 5 of the lawsuit?  
 6 **A. After a while, yes.**  
 7 Q. Okay. Well, it was you and your attorneys  
 8 that sent the press clippings out, wasn't it?  
 9 MR. FITPATRICK: Object to form.  
 10 **THE WITNESS: That's true, but that**  
 11 **doesn't mean that it still wouldn't take my valuable**  
 12 **time away from my studies or my craft.**  
 13 BY MR. SELLERS:  
 14 Q. Okay. But you were happy that it was getting  
 15 the attention, weren't you?  
 16 **A. In the beginning and to an extent now. But**  
 17 **if I could, I would rather have it get attention and**  
 18 **me not.**  
 19 Q. Okay. Did you suffer any damage to your  
 20 reputation because of the incident on August 10th?  
 21 MR. FITPATRICK: Object to form.  
 22 **THE WITNESS: I would consider that a**  
 23 **matter of opinion.**  
 24 BY MR. SELLERS:  
 25 Q. Well, you claim you suffered damage to your

# EXHIBIT E



Page 5

1		
2	E X H I B I T S	
3		Page
4	Exhibit No. 60	192
5	Text Messages	
6	Exhibit No. 61	196
7	Text Messages	
8	Exhibit No. 62	200
9	Text Messages	
10	Exhibit No. 63	201
11	Text Message	
12	Exhibit No. 64	201
13	Text Message	
14	Exhibit No. 65	203
15	Text Message	
16	Exhibit No. 66	206
17	Text Message	
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19	Text Messages	
20	Exhibit No. 68	208
21	Text Messages	
22	Exhibit No. 69	211
23	E-mail - 9/12/22	
24	Exhibit No. 70	213
25	Text Messages - IP 0000765-0000767	

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S T I P U L A T I O N S

The deposition of B.P., was taken by Notice, at Tullahoma City School District, 510 South Jackson Street, Tullahoma, Tennessee, on March 25, 2025, for all purposes under the Federal Rules of Civil Procedure.

All formalities as to caption, notice, statement of appearance, et cetera, are waived. All objections, except as to the form of the question, are reserved to the hearing, and that said deposition may be read and used in evidence in said cause of action in any trial thereon or any proceeding herein.

It is agreed that TONYA D. STOLZE, LCR, Notary Public and Court Reporter for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness was not discussed.

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\* \* \*

B.P.,  
was called as a witness, and after having been duly sworn, testified as follows:

EXAMINATION

QUESTIONS BY MR. SELLERS:

Q. B.P., my name is Andrew Sellers. And I'm one of the attorneys representing the Tullahoma City Schools in the lawsuit that you have brought on behalf of your son, I.P.

And you understand I'm here to ask you some questions today regarding the background and the facts surrounding your claim. Do you understand that?

A. Yes.

Q. All right. Can you state your full name for the record?

A. Yes. B.P.

Q. Okay. And have you ever given a deposition before?

A. No.

Q. Okay. Let me give you some basic instructions. Obviously, I'm here to ask you some questions. And if you can give me a good verbal

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response to my questions because there may be some questions that just call for a yes or a no answer.

And I know we -- I'm sitting here looking at you across the table, and you may nod or shake your head for yes or no. And I know what you mean by that because I can see you. But obviously the court reporter is here today, and she's taking down everything that we say today. And it's very difficult for her to get down a nod or a shake of the head.

So if you could please give me a good yes or no, and it may be during the deposition that either your -- your counsel or myself may prompt, Is that a yes or is that a no? Please don't be offended. We're trying to make sure we get a good record. Okay?

Also, know that, especially us southerners all -- always have a habit of saying "uh-huh" and "huh-uh" for yes and no. If you could please refrain from doing that as well because even though court reporters do a good job of getting that down, oftentimes when you're reading back the transcript, it's difficult to know whether you meant the affirmative or the negative. So once again if you can give me a good verbal yes

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1 Q. Okay. I mean, was he generally a  
 2 straight A student, an A and B student, or a B and  
 3 C student?  
 4 **A. His second semester transcript was**  
 5 **3.814 --**  
 6 Q. Okay.  
 7 **A. -- when he was applying to colleges.**  
 8 Q. Okay.  
 9 **A. I do remember that specifically.**  
 10 Q. Okay. So generally you're applying  
 11 for college during your -- after your junior year.  
 12 So that would have been after his junior year his  
 13 cumulative GPA --  
 14 **A. It would have been after his first**  
 15 **semester of his senior year.**  
 16 Q. Okay. So his cumulative GPA at that  
 17 time was 3.8 plus?  
 18 **A. Yes.**  
 19 Q. Okay. Did he take any honors classes?  
 20 **A. Yes.**  
 21 Q. Okay. What honors classes did he  
 22 take?  
 23 **A. He started with all honors his**  
 24 **freshman year and had to drop at least one of**  
 25 **those because he couldn't see the classwork and**

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1 **his materials. He's always taken Honors Band. I**  
 2 **think he took Honors English probably his**  
 3 **sophomore and junior year. He never took anymore**  
 4 **Honors Math. I think that's it.**  
 5 Q. Okay. Did he take any AP courses  
 6 during high school?  
 7 **A. No.**  
 8 Q. Okay. It's my understanding he  
 9 obviously was in the band all four years?  
 10 **A. Yes.**  
 11 Q. Okay. Was he involved in any other  
 12 extracurricular activities while in school?  
 13 **A. He -- scouting.**  
 14 Q. Scouting.  
 15 **A. Boy Scouts.**  
 16 Q. Okay. And if I recall correctly, did  
 17 he receive an Eagle Scout?  
 18 **A. No. He --**  
 19 Q. He didn't get to that level?  
 20 **A. No. He had to focus on music to get**  
 21 **the --**  
 22 Q. Okay.  
 23 **A. -- college money.**  
 24 Q. How far did he go in Boy Scouting?  
 25 **A. Let me see if I remember. First**

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1 **Class maybe.**  
 2 Q. Okay. Did he -- was he in scouting  
 3 the entire time he was in high school?  
 4 **A. No. His senior year was all music.**  
 5 Q. Okay.  
 6 **A. Oh, extracurricular -- he also**  
 7 **performed with the Nashville Youth Jazz.**  
 8 Q. How long did he do that?  
 9 **A. One year.**  
 10 Q. Was he a member of any clubs or  
 11 anything at the school?  
 12 **A. No.**  
 13 Q. Okay. And he's currently attending  
 14 M.T.S.U.?  
 15 **A. Yes.**  
 16 Q. Did he -- let me backtrack for just a  
 17 second. Did he receive any kind of awards while he  
 18 was in high school?  
 19 **A. Yes.**  
 20 Q. Okay. What awards did he receive?  
 21 **A. Well, I don't know if this is an**  
 22 **award. He regularly attended the Midstate and**  
 23 **then -- then later the Midstate Jazz, All State,**  
 24 **and Gov. school. I mean, he got presented with**  
 25 **things for that.**

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1 Q. Okay. What year did he attend  
 2 Governor's School?  
 3 **A. That would have been the summer of**  
 4 **'23.**  
 5 Q. Between his junior and senior year?  
 6 **A. Yes.**  
 7 Q. Okay. And it's my understanding he  
 8 also made All State in band his senior year?  
 9 **A. He did, yeah, his senior year.**  
 10 Q. Okay.  
 11 **A. And -- and All State Jazz.**  
 12 Q. Okay.  
 13 **A. And he did Midstate Jazz before**  
 14 **that.**  
 15 Q. What's his area of study at M.T.S.U?  
 16 **A. Trombone Performance.**  
 17 Q. Does he receive any kind of services  
 18 or assistance with his coursework at M.T.S.U.?  
 19 **A. He is on file with his 504, but he**  
 20 **has not used the services yet.**  
 21 Q. Is he on any kind of scholarship at  
 22 M.T.S.U.?  
 23 **A. Yes.**  
 24 Q. What kind of scholarship is he on at  
 25 M.T.S.U.?

1 **A. Well, he has the lottery money. He**  
 2 **has an academic scholarship and two different**  
 3 **music scholarships.**  
 4 Q. What kind of grades did he make his  
 5 first semester at M.T.S.U.?  
 6 **A. I don't actually know.**  
 7 Q. Okay. To your knowledge what social  
 8 media sites did I.P. have in 2022?  
 9 **A. Instagram. Possibly Snapchat. And**  
 10 **I don't know. Is Reddit a social media thing?**  
 11 Q. Okay. Any others?  
 12 **A. I don't know for sure.**  
 13 Q. Do you know what his username or  
 14 account name was on Instagram in 2022?  
 15 **A. No.**  
 16 Q. Okay. Do you know what his account  
 17 name or username was on Snapchat in 2022?  
 18 **A. No.**  
 19 Q. Do you know what his account or  
 20 username was on Reddit in 2022?  
 21 **A. No.**  
 22 Q. Okay. Did you follow him on Instagram  
 23 at that point?  
 24 **A. No.**  
 25 Q. Okay. Did you ever check his

1 Instagram account to see what he was posting or  
 2 what other people were -- that he was following  
 3 posting?  
 4 **A. He showed me things on his account.**  
 5 Q. Okay. Did you ever check it on your  
 6 own accord?  
 7 **A. No.**  
 8 Q. Okay. Did I.P. have any disciplinary  
 9 problems his senior year?  
 10 **A. No.**  
 11 Q. Other than the incident we're here  
 12 about today, did he have any disciplinary issues  
 13 his junior year?  
 14 **A. No.**  
 15 Q. Did he have any disciplinary issues  
 16 his sophomore year?  
 17 **A. Yes.**  
 18 Q. Okay. Tell me what disciplinary  
 19 issues he had his sophomore year.  
 20 **A. A photo of a former band student was**  
 21 **anonymously dropped during a pep rally. His**  
 22 **trombone section leader suggested he post it on**  
 23 **the trombone group chat, and they all discussed**  
 24 **it. And he and another student -- well, the**  
 25 **student that was involved had not been removed**

1 **from the trombone chat and texted back, and then**  
 2 **the trombones discussed it. And I.P. and another**  
 3 **student responded negative comments --**  
 4 Q. Okay.  
 5 **A. -- that they responded with. And**  
 6 **the next day the trombone leader turned those**  
 7 **over to the band teachers, and I.P. received an**  
 8 **in-school suspension.**  
 9 Q. When you say they had responded  
 10 negatively, were they making fun of this other  
 11 person?  
 12 **A. Yes.**  
 13 Q. Okay. How many days of in-school  
 14 suspension did he receive?  
 15 **A. I think it was three.**  
 16 Q. Who was the group leader?  
 17 **A. Of his section?**  
 18 Q. Yes.  
 19 **A. He was a minor at the time.**  
 20 Q. Okay. That's fine. But who was it?  
 21 **A. Do I have to -- I feel**  
 22 **uncomfortable --**  
 23 Q. Well, she's going to put initials in  
 24 the transcript so it's --  
 25 **A. Can I give the -- the initials then?**

1 Q. Well, I would like to know who the  
 2 name of the group leader -- section leader?  
 3 **A. L. His last started with a P. P --**  
 4 **P.**  
 5 Q. Okay.  
 6 **A. One of those, I think.**  
 7 Q. So if I'm understanding what you're  
 8 saying, that somehow a photo of a former band  
 9 member got dropped during a pep rally --  
 10 **A. Yes.**  
 11 Q. -- that the section leader then  
 12 suggested I.P. to post that photo to a group text?  
 13 **A. For the trombone players.**  
 14 Q. Okay. And that this former band  
 15 member was still part of that group text?  
 16 **A. Yes.**  
 17 Q. And he responded to the photo meme?  
 18 **A. Yes.**  
 19 Q. What was the nature of this photo?  
 20 **A. It was the former band student**  
 21 **walking down the hall, but he looked kind of**  
 22 **goofy.**  
 23 Q. Okay. And so he made a comment, and  
 24 in response I.P. and another student responded to  
 25 it?

1 at her, "We know it's him."  
 2 Oh, they asked her if L was I.P. and  
 3 she said, "Yes." And then they were asking for  
 4 the, you know, username, which she doesn't know  
 5 because they're all weird and sometimes they  
 6 change them. She just picks up her phone and  
 7 it's there.  
 8 And she said that, that they were  
 9 yelling at her "We know it's him. We know he did  
 10 it. Stop protecting him. Stop lying." And  
 11 eventually when she couldn't come up with the  
 12 username or whatever, they made her pull up the  
 13 Instagram account. And she refused to several  
 14 times asking why and what is it you think he's  
 15 done or whatever. But she eventually pulled up  
 16 the account herself on her phone because she  
 17 didn't -- she couldn't give them the username.  
 18 And they looked through it, and they  
 19 took pictures of the three memes that were posted  
 20 there and towards the end -- they had been out  
 21 there so long Mr. Scott came to see about it and  
 22 physically stepped in front of her. And she said  
 23 that's when she felt safe again.  
 24 And as soon as she was released to  
 25 go back inside, she said she was crying and she

1 went to I.P. and said, "I don't know what's  
 2 happening. I don't know what they're looking  
 3 for, but this is what I did. And they think you  
 4 did something, you know." And she was kind of  
 5 incoherent. So I.P. was like, "Okay", you know.  
 6 Q. Okay. R.Y. tell you anything else?  
 7 A. I think -- I mean, obviously, they  
 8 were going to react when they were telling them  
 9 what happened to I.P. once he went to the office.  
 10 I can't think of anything else pertinent.  
 11 Q. Just for clarification, you said that  
 12 Mr. Quick and Dr. Flowers showed her pictures. Are  
 13 you talking -- what pictures -- to your  
 14 understanding what pictures did they show her when  
 15 they pulled her out of band?  
 16 A. The Hitler and the KKK --  
 17 Q. Okay.  
 18 A. -- because they didn't know about  
 19 the other ones until R.Y. pulled it up.  
 20 Q. Did Mr. Crutchfield e-mail you the  
 21 memes the following day?  
 22 A. I think he -- I think he e-mailed  
 23 them as soon as he went back inside the school on  
 24 the --  
 25 Q. Okay.

1 A. I just forgot about that we had  
 2 access to them until the next day. And finally  
 3 I.P. said, "Hey, wasn't he going to e-mail you  
 4 these" because I kept going, "I just don't  
 5 understand."  
 6 Q. So he did e-mail you those?  
 7 A. Yes, he did.  
 8 Q. Okay. Okay. Had -- when you had --  
 9 by the time you had talked to R.Y., had you set up  
 10 any kind of meeting with Mr. Crutchfield?  
 11 A. No.  
 12 Q. Okay. Did you communicate with anyone  
 13 else about this situation on Wednesday night?  
 14 A. No.  
 15 Q. Did you have any communication with  
 16 anyone else that we -- we talked about the Whites.  
 17 A. Yes.  
 18 Q. Did you tell the Whites about the --  
 19 like the details of the situation or just that he  
 20 was having a mental health crisis?  
 21 A. No. I told Lori the details.  
 22 Q. Okay. On Wednesday night?  
 23 A. On Wednesday afternoon.  
 24 Q. Afternoon. Okay.  
 25 A. Right after we got home.

1 Q. Did you have communications with  
 2 anyone else on Thursday other than R.Y. and her  
 3 mother about the situation?  
 4 A. I might have talked to my mother.  
 5 Q. Okay. And what's your mother's name?  
 6 A. Martha Roland. I talked to her  
 7 somewhere in that first period.  
 8 Q. Okay.  
 9 A. I think. I'm pretty sure.  
 10 Q. Anyone else that you would have  
 11 communicated with on that Thursday?  
 12 A. I think it was Thursday when I  
 13 contacted my brother for legal advice.  
 14 Q. Okay. Brother's name?  
 15 A. David Roland.  
 16 Q. He's an attorney?  
 17 A. Yes.  
 18 MR. SELLERS: We've been going about  
 19 a hour. Let's go off record.  
 20 (Short break.)  
 21 BY MR. SELLERS:  
 22 Q. I believe before we broke for lunch we  
 23 had kind of discussed the Thursday following the  
 24 incident at the school on August 10th. At some  
 25 point in time did you have a meeting with

1 Mr. Crutchfield and Mr. Quick?  
 2 **A. Yes.**  
 3 Q. Okay. Did that meeting occur on that  
 4 Friday, which would have been August 12th?  
 5 **A. Yes.**  
 6 Q. Okay. What was -- who called that  
 7 meeting?  
 8 **A. I did...**  
 9 Q. Okay. Had you had any further  
 10 conversation with Mr. Crutchfield between the time  
 11 you left the school until this meeting?  
 12 **A. No.**  
 13 Q. Had you had any conversation with  
 14 Mr. Quick before this meeting?  
 15 **A. No.**  
 16 Q. Okay. So what was discussed in that  
 17 meeting?  
 18 **A. I asked them their version of what**  
 19 **happened that day.**  
 20 Q. Okay. Who was doing the talking?  
 21 Mr. Quick or Mr. Crutchfield?  
 22 **A. I saw Mr. Crutchfield alone first.**  
 23 Q. Okay.  
 24 **A. I told him I had heard I.P.'s story,**  
 25 **but I needed to hear their's. And he said he**

1 and he said "And frankly I found them disturbing,  
 2 too".  
 3 Q. Okay.  
 4 **A. And it was the Hitler and Ku Klux**  
 5 **Klan ones.**  
 6 Q. Okay.  
 7 **A. And he also said that they were**  
 8 **anonymous, and that the student had no idea where**  
 9 **they came from.**  
 10 Q. Okay.  
 11 **A. I asked in that case, "How were they**  
 12 **connected to I.P.?" And he said she -- that**  
 13 **after further talking or questioning, she said**  
 14 **she thought she might have heard someone in the**  
 15 **cafeteria mention L and Instagram and then he**  
 16 **stopped.**  
 17 Q. Okay.  
 18 **A. So I wanted to make sure I**  
 19 **understood. And I said, "Somebody brought you**  
 20 **the pictures. They were anonymously dropped.**  
 21 **She said she didn't have any idea where they came**  
 22 **from, but she thought she might have heard**  
 23 **somebody behind her in the cafeteria mention L**  
 24 **and Instagram."**  
 25 **And I looked at him, and he started**

1 didn't know anything about it, that he had gotten  
 2 the call to come to the office, that I.P. and  
 3 Mr. Scott were on their way.  
 4 **And I said "So you don't know what**  
 5 **happened before then?" And he said "No". And**  
 6 **then we just had to sit there awkwardly until**  
 7 **they could find Mr. Quick.**  
 8 Q. Okay.  
 9 **A. And that was the duration of my**  
 10 **conversation with Mr. Crutchfield.**  
 11 Q. Okay. So at some point did Mr. Quick  
 12 come into the office?  
 13 **A. Yes.**  
 14 Q. Okay.  
 15 **A. And then we moved to his office.**  
 16 Q. Okay.  
 17 **A. And Mr. Crutchfield came with us.**  
 18 Q. Okay. So what was the conversation in  
 19 Mr. Quick's office?  
 20 **A. I asked him just to tell me his**  
 21 **version of what happened that day.**  
 22 Q. Okay. What did he tell you?  
 23 **A. He said that a student had come to**  
 24 **the office and said that she had -- there had**  
 25 **been images airdropped that she found disturbing,**

1 to nod, and then all of a sudden his eyes got big  
 2 and he said "But that's not what he's in trouble  
 3 for."  
 4 Q. Did he say what he was in trouble for?  
 5 **A. I'm sorry. I need to add something**  
 6 **about the conversation with Mr. Crutchfield.**  
 7 Q. Okay.  
 8 **A. When he said he got the call to the**  
 9 **office, he said, "And then I brought him here and**  
 10 **gave him out-of-school suspension for three**  
 11 **days." And I said, "Wait a minute. I was of the**  
 12 **understanding that it was five days." And he**  
 13 **said "No. I came back to the computer and I**  
 14 **changed it to three days." Yeah. I forgot about**  
 15 **that --**  
 16 Q. Okay.  
 17 **A. -- so anyway at this point having**  
 18 **heard Mr. Quick's -- what Mr. Quick said about**  
 19 **that, he -- he also said -- came back and**  
 20 **suspended him for three days.**  
 21 **And I said, Well, I need to stop --**  
 22 **when he said, you know, that's not what he's --**  
 23 **those two memes weren't what he was in trouble**  
 24 **for, I said, then "We need to stop and clarify**  
 25 **something." And so it was my understanding that**

1 he was suspended for these five images for five  
 2 days.  
 3 And he said that "Under further  
 4 consideration, Mr. Crutchfield had decided three  
 5 days were more appropriate", and that he was  
 6 being suspended because of the three images they  
 7 did find on his phone.  
 8 Q. Okay.  
 9 MR. ZEMAN: Object to form.  
 10 MR. SELLERS: To which question?  
 11 I'm sorry. All I said was "Okay".  
 12 MR. ZEMAN: Yeah. I thought that  
 13 was the question.  
 14 MR. SELLERS: No, no, no. A bad  
 15 habit of mine. A bad habit of mine to just say  
 16 "Okay".  
 17 **THE WITNESS: Bring me back to where**  
 18 **we were because --**  
 19 BY MR. SELLERS:  
 20 Q. Yeah, I will. Yeah.  
 21 **A. I got thrown when I remembered that**  
 22 **about Mr. Crutchfield, but it was important.**  
 23 Q. Okay. So Mr. Quick then says that Mr.  
 24 Crutchfield had changed it to three days and that  
 25 he was only being suspended for the three images

1 BY MR. SELLERS:  
 2 Q. And did he -- what was Mr. Quick's  
 3 response to that?  
 4 **A. Raised his eyebrows and said, "What**  
 5 **condition?"**  
 6 Q. Did you respond to that? Did you tell  
 7 him what condition?  
 8 **A. I asked him, "Did nobody tell you**  
 9 **what happened in Mr. Crutchfield's office?"**  
 10 Q. Did he respond?  
 11 **A. Yes. I'm trying to make sure I have**  
 12 **it right. I said, "Did nobody inform you of what**  
 13 **happened with I.P. in Mr. Crutchfield's office?"**  
 14 **And he said, "Of course, I knew about it. I was**  
 15 **here, wasn't I?" And I said, "Then why didn't**  
 16 **you help?"**  
 17 Q. Did he answer you?  
 18 **A. Eventually he said, "Well, I thought**  
 19 **that's what you were doing, and besides he wasn't**  
 20 **doing any of that stuff until you showed up." He**  
 21 **said, "Until you walked through the door, he was**  
 22 **perfectly fine. He was crying, but he was**  
 23 **talking with -- having a conversation with**  
 24 **Mr. Crutchfield", and then he looked at**  
 25 **Mr. Crutchfield and said, "Isn't that right?"**

1 that they found on his phone; is that right?  
 2 **A. Yes.**  
 3 Q. Okay. Any further conversation about  
 4 what transpired?  
 5 **A. When I asked to go back and clarify**  
 6 **things because I wasn't -- you know, my**  
 7 **understanding of the events, he said that, and**  
 8 **then -- no, he didn't actually. Yeah, he did,**  
 9 **but -- but he also prefaced it by saying, "I'm**  
 10 **willing to discuss this with you."**  
 11 Q. "He" being Quick?  
 12 **A. Yes.**  
 13 Q. Okay.  
 14 **A. Mr. Crutchfield was just in a chair.**  
 15 **He said, "I'm willing to discuss this with you,**  
 16 **but we've only got a few minutes because the bell**  
 17 **is supposed to ring." And I said, "I'm aware of**  
 18 **the importance of staff in the hallways when the**  
 19 **bell rings, but I'm not sure what you would be**  
 20 **needed for out there that's more important than**  
 21 **the events that led to me finding my son in the**  
 22 **condition I found him in."**  
 23 Q. Okay.  
 24 MR. ZEMAN: Object to form.  
 25 //

1 Q. Did Mr. Crutchfield respond?  
 2 **A. Eventually he looked very surprised**  
 3 **and finally nodded his head just a little bit.**  
 4 Q. Any further conversation between you  
 5 and Mr. Quick?  
 6 **A. I believe he mentioned looking for**  
 7 **the nurse --**  
 8 Q. Okay.  
 9 **A. -- at one point, but she left the**  
 10 **school. But when he stood by and would not**  
 11 **discuss that I.P. was under any difficult**  
 12 **situation until I walked through the door, I just**  
 13 **looked at him and said, "If we can't speak**  
 14 **honestly about the bear facts of what happened, I**  
 15 **don't see how we move forward in this**  
 16 **conversation." And he just shrugged at me and at**  
 17 **that point I handed him the letter that I had**  
 18 **prepared just in case.**  
 19 Q. Just in case of what?  
 20 **A. In case they didn't have a story**  
 21 **that explained what happened or they didn't --**  
 22 **you know, we couldn't -- there was nothing -- in**  
 23 **case there was nothing that either justified**  
 24 **their punishment or circumstances that mitigated**  
 25 **it and we talked about the punishment.**

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1 But when we came in, he said -- oh,  
 2 he also had said that the girl that they heard  
 3 saying L and Instagram, he said that they went  
 4 and talked to her and that she confirmed  
 5 everything, which I knew was not the case from my  
 6 conversation the night before; but I just let it  
 7 go. But between that and him saying they were  
 8 going to keep -- keep punishing him, even though  
 9 it wasn't what they went and looked at him for.  
 10 And they knew that he didn't have it.  
 11 There were just no mitigating  
 12 factors and not a bit of concern for getting to  
 13 the bottom of it. But when he wouldn't budge on  
 14 the state that I.P. was in and said he just made  
 15 it all -- he wouldn't move on that, I didn't see  
 16 any -- any grounds so -- so my just in case  
 17 letter, that's when I decided I was going to give  
 18 it to them because they weren't really addressing  
 19 that there was a problem with what they had done  
 20 and that there was an effect on my child.  
 21 MR. SELLERS: If you'll give me just  
 22 a minute here. Is it 36?  
 23 MR. ZEMAN: I'm assuming the  
 24 letter --  
 25 //

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1 BY MR. SELLERS:  
 2 Q. I'm showing you a document that's been  
 3 previously marked as Exhibit Number 36. Is this  
 4 the letter that you're referring to?  
 5 A. **It appears to be, yes.**  
 6 Q. Did you prepare that letter?  
 7 A. **Yes.**  
 8 Q. Okay. And take a minute to read  
 9 through it to make sure it's your letter.  
 10 A. **(Reviewing document.)**  
 11 **Yes. This is it.**  
 12 Q. Okay. When did you prepare that  
 13 letter?  
 14 A. **On the 12th before I went to school.**  
 15 Q. Okay. At what time did the meeting  
 16 with Mr. Quick and Mr. Crutchfield take place?  
 17 A. **I had aimed for last period. I**  
 18 **think it was after 2:00, and it was sometime**  
 19 **after 2:30 when they found Mr. Quick.**  
 20 Q. And so you had prepared that letter  
 21 that morning?  
 22 A. **Yes. I didn't want to go to the**  
 23 **meeting unprepared.**  
 24 Q. Okay. In that letter at that point  
 25 you were already discussing litigation, right?

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1 A. **The possibility of it.**  
 2 Q. Okay.  
 3 A. **That's why I didn't give it to them**  
 4 **to start with.**  
 5 Q. Okay. Did you -- was there just one  
 6 copy of this letter or did you hand a copy to both  
 7 of them?  
 8 A. **I had a copy for each, but I wasn't**  
 9 **sure if I was going to use it for either both or**  
 10 **individually --**  
 11 Q. Okay.  
 12 A. **-- until I was there.**  
 13 Q. Did you hand them each a copy of it?  
 14 A. **Yes.**  
 15 Q. Okay. At any point in time during the  
 16 discussion with Mr. Quick and Mr. Crutchfield, did  
 17 you ever request for them to rescind the  
 18 suspension?  
 19 A. **No. We never got there.**  
 20 Q. Okay. At any point in time did you  
 21 ever appeal the suspension beyond the school level?  
 22 A. **It was not long enough for the**  
 23 **appeals process.**  
 24 Q. Okay. Did you ever contact anybody at  
 25 Central Office, specifically Director Stephens,

Page 128

1 about the suspension and your belief that it was  
 2 erroneous?  
 3 A. **No. It wasn't long enough for the**  
 4 **appeals process...**  
 5 Q. Well, my question -- and I understand  
 6 what you're talking about, but at any point in time  
 7 did you contact Dr. Stephens about this situation  
 8 and the suspension?  
 9 A. **No.**  
 10 Q. Okay. Have you spoken with anyone  
 11 else at the school or within the school system  
 12 about the suspension other than Mr. Quick and  
 13 Mr. Crutchfield?  
 14 A. **I sent a text as soon as I was out.**  
 15 **I wanted to come talk to the band directors**  
 16 **because they didn't have any information on it,**  
 17 **and I had told them to wait until I got all the**  
 18 **information.**  
 19 **But Lisa was not at the school, and**  
 20 **Justin had an after-school appointment so I sent**  
 21 **them a text telling them what had happened**  
 22 **including what Mr. Quick had said. And that**  
 23 **was -- yeah. I sent that, so those two -- and**  
 24 **Tori that I had contacted was teaching at the**  
 25 **school at that time.**

# EXHIBIT F

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
 2 EASTERN DISTRICT OF TENNESSEE  
 3 AT WINCHESTER DIVISION

---

4 I.P. a minor, by and through B.P.,  
 5 Plaintiff,  
 6 vs. No. 4:23-cv-00026  
 7 TULLAHOMA CITY SCHOOLS, a  
 8 political subdivision of the  
 9 State of Tennessee; JASON QUICK,  
 10 in his individual capacity; and  
 11 DERRICK CRUTCHFIELD, in his  
 12 individual capacity,  
 13 Defendants.

---

14  
 15  
 16 Video Deposition of:  
 17 JASON QUICK

18 Taken on behalf of the Defendant  
 19 January 16, 2025  
 20 Commencing at 8:59 a.m. (CST)

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21  
 22  
 23  
 24  
 25 REPORTED BY: Tonya D. Stolze, LCR

Page 3

1 A P P E A R A N C E S

2  
 3  
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13  
 14  
 15  
 16  
 17 Also Present:  
 18  
 19 MR. MIKE CASEY - Videographer  
 20 I.P.

21  
 22  
 23  
 24  
 25

Page 2

1 A P P E A R A N C E S

2  
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1 I N D E X

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Page 5

1

2           S T I P U L A T I O N S

3

4

5           The video deposition of JASON QUICK, was

6 taken by Notice, at 501 South Jackson Street,

7 Tullahoma, Tennessee, on January 16, 2025, for all

8 purposes under the Federal Rules of Civil Procedure.

9           All formalities as to caption, notice,

10 statement of appearance, et cetera, are waived. All

11 objections, except as to the form of the question,

12 are reserved to the hearing, and that said

13 deposition may be read and used in evidence in said

14 cause of action in any trial thereon or any

15 proceeding herein.

16           It is agreed that TONYA D. STOLZE, LCR,

17 Notary Public and Court Reporter for the State of

18 Tennessee, may swear the witness, and that the

19 reading and signing of the completed deposition by

20 the witness was not discussed.

21

22

23

24

25

Page 6

1                           \* \* \*

2           THE VIDEOGRAPHER: We are now on the

3 record. My name is Mike Casey. I'm the

4 videographer retained by Lexitas.

5           This is a video deposition for the Court

6 -- U.S. States -- United States District Court,

7 Eastern District of Tennessee, Winchester Division.

8           Today's date is 1/16/25. The time is

9 8:59 a.m. The deposition is being held at Tullahoma

10 School Central Office.

11           The case number is 4:23-cv-26 in the

12 matter of L.P [sic], a minor, by and through, B.P.,

13 Plaintiff, versus Tullahoma City Schools, a

14 political subdivision of the State of Tennessee,

15 Jason Quick, in his individual capacity, and Derek

16 Crutchfield, in his individual capacity, Defendants.

17           The deponent is Jason Quick, and all

18 counsel will be notified [sic] on the record.

19 Please silence your cell phones. And the court

20 reporter is Tonya Stolze. She will now swear the

21 witness, and the deposition will begin.

22

23                           \* \* \*

24                           JASON QUICK,

25 was called as a witness, and after having been duly

Page 7

1 sworn, testified as follows:

2

3                           EXAMINATION

4 QUESTIONS BY MR. FITZPATRICK:

5 Q.    Good morning, Mr. Quick.

6 A.    Good morning.

7 Q.    Before we get started Mr. Sellers and I

8 discussed briefly putting something on the record,

9 and we did this before yesterday's deposition as

10 well.

11        Because this case involves either minors or

12 people who were minors when the events took place,

13 when those things are filed on the public docket,

14 the minors, or if they were minors at the time, are

15 referred to by their initials. But in a deposition

16 it can be hard to remember to refer to people by

17 their initials, and sometimes we don't remember all

18 of their initials.

19        So today if there's a student you need to

20 discuss who either is a minor or was a minor, feel

21 free to use their complete name. And the agreement

22 between counsel is that our court reporter will

23 transcribe it as the -- as the initials, but this

24 will enable us to have a more natural conversation.

25 Does that make sense?

Page 8

1 A.    Sure.

2        MR. FITZPATRICK: And, Andrew, does that

3 accurately reflect our agreement?

4        MR. SELLERS: It does.

5        MR. SPINING: Might I just point out for

6 the record that Mr. Quick individually has been

7 dismissed from the case.

8        MR. FITZPATRICK: He has.

9        MR. SPINING: Yes. And so the style as

10 read is probably correct, but I just wanted to make

11 that clarification.

12        MR. FITZPATRICK: Yes. Yes. That's

13 correct. The Court had -- did enter an order

14 allowing the claims against Tullahoma City Schools

15 to go forward and dismissing the claims against

16 Mr. Quick and Mr. Crutchfield as individuals on

17 qualified immunity. So here Mr. Quick is testifying

18 today in his capacity as a former employee of

19 Tullahoma Public Schools.

20        MR. SPINING: Agreed. Thank you.

21        THE VIDEOGRAPHER: Conor, one second.

22 Will the attorneys please identify yourselves?

23        MR. FITZPATRICK: I am Conor

24 Fitzpatrick, counsel for Plaintiff, I.P.

25        MR. ZEMAN: I'm Jeff Zeman. I'm also

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1 classrooms, that's the school -- then the school has  
 2 jurisdiction to correct the problem. And that is  
 3 what I took away from that meeting that Dr. Stephens  
 4 had in July.  
 5 Q. During your time as principal at Tullahoma  
 6 High School, were you ever involved in -- in  
 7 investigating student misconduct?  
 8 A. Yes.  
 9 Q. Would you ever initiate an investigation into  
 10 student misconduct?  
 11 A. Yes.  
 12 Q. Describe the circumstances when you would  
 13 typically do that.  
 14 A. Typically that would occur should my  
 15 assistant principal not be available, be out of the  
 16 building, or being involved in something else that  
 17 would not allow him to initiate the investigation I  
 18 would.  
 19 Q. Could you describe for me a typical  
 20 investigation?  
 21 A. Understand -- understand the -- understand  
 22 the behavior, what -- what -- define the behavior.  
 23 What's the behavior? Then find out who all was  
 24 involved in determining who the true actors, if  
 25 that's the right word, who the true actors were, and

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1 determining what caused it, who was involved.  
 2 Q. For investigations are those formal or  
 3 informal?  
 4 A. Informal.  
 5 Q. Is there any paperwork that goes along with  
 6 an investigation?  
 7 A. Typically, no.  
 8 Q. Could there be?  
 9 A. Any -- any information gathered would be  
 10 input into the software system that we store the  
 11 data in. If there was anything else, no, there's  
 12 no -- no.  
 13 Q. When you're involved in an investigation as  
 14 the principal, I -- I would imagine it's not rare to  
 15 receive conflicting version of events; is that fair?  
 16 A. True.  
 17 Q. How do you go about decide -- figuring out  
 18 what happened?  
 19 A. You speak with both parties or however many  
 20 parties you have. You ask the questions to try to  
 21 determine participation and/or guilt, and then you  
 22 go from there.  
 23 Q. What -- who would typically speak to the  
 24 student to get their version of events?  
 25 A. Any one of the administrators.

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1 Q. Have you done it before?  
 2 A. Yes.  
 3 Q. When would you be involved at someone who's  
 4 questioning a student?  
 5 A. At someone -- again, if -- if Mr. Crutchfield  
 6 is not involved or not initially involved or any of  
 7 the administrators, I would do that. I would be --  
 8 I would handle that.  
 9 Q. So is it fair to say you -- you were usually  
 10 there kind of as an auxiliary backup, usually kind  
 11 of the frontline of -- for investigations would be  
 12 an assistant principal. But if they weren't  
 13 available, you would be involved or --  
 14 A. It -- I was -- I'm back to your thought of  
 15 initiating investigation. That's what I would be  
 16 involved in. If there's a second -- if Mr.  
 17 Crutchfield is doing it, very rarely do I -- would I  
 18 be involved. He doesn't need me, unless he calls  
 19 upon me to come in and help him.  
 20 There would be occasions where I may have a  
 21 strong relationship with a student, that they might  
 22 be more amenable to talking to me and being -- than  
 23 they would Mr. Crutchfield. That could occur on  
 24 occasions. That -- that could occur.  
 25 Q. What powers did you have to discipline

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1 students for misconduct?  
 2 A. Everything from in-school suspension all the  
 3 way to recommending for alternative learning  
 4 placement.  
 5 Q. Are there any circumstances in which you  
 6 can't be involved in a disciplinary decision?  
 7 A. No, not to my knowledge.  
 8 Q. Now, I gather there are different levels of  
 9 punishment students can receive, everything from a  
 10 verbal reprimand up to expulsion; correct?  
 11 A. Uh-huh.  
 12 Q. Is there a certain level of punishment where  
 13 you have to get involved?  
 14 A. The only level that requires me to get  
 15 involved would be if a student is being referred for  
 16 alternative placement into an alternative  
 17 environment. That would come from me typically.  
 18 Q. So Assistant Principals have authority to  
 19 issue an out-of-school suspension, for example?  
 20 A. Yes.  
 21 Q. And that authority is something that does not  
 22 need your sign-off. They have that authority; is  
 23 that correct?  
 24 A. They do based on the offense, based on maybe  
 25 the history of the student, whether it's a second or

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1 third offense, those kind of things, then he would  
 2 have that leeway.  
 3 Q. And leeway --  
 4 A. It would be -- it would be in his discretion  
 5 as to what he think is -- thinks is appropriate.  
 6 Q. And your understanding of Tullahoma City  
 7 School's policy is that the Assistant Principals  
 8 have that authority standing on their own without  
 9 you having to provide your additional approval; is  
 10 that correct?  
 11 A. I do not have to provide my additional  
 12 approval. There -- there could be times when  
 13 Mr. Crutchfield would ask me my thoughts on what I  
 14 think, but typically I would allow him -- in most  
 15 cases I would allow him to do that, not all, but  
 16 most.  
 17 MR. FITZPATRICK: I'd like to hand you a  
 18 document, a document that I -- I think next up will  
 19 be Number 30.  
 20 (WHEREUPON, a document was marked as  
 21 Exhibit Number 30.)  
 22 BY MR. FITZPATRICK:  
 23 Q. Mr. Quick, do you recognize this document?  
 24 A. I believe it comes from the school board's  
 25 policy.

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1 Q. And the school board's policy, these are  
 2 things that you would have been bound by as  
 3 Tullahoma High School principal; correct?  
 4 A. I think -- I would have been bound by these,  
 5 but I don't think this is solely all inclusive.  
 6 Q. There are other policies besides the  
 7 suspension policy, correct?  
 8 A. There's also a policy within the school --  
 9 the high school's handbook, which may address things  
 10 that may not be on here.  
 11 Q. That's correct. And we'll get to that, but  
 12 right now I'm just talking about this -- this  
 13 document.  
 14 A. Uh-huh.  
 15 Q. Does this appear to be the -- to you to be a  
 16 correct version of the Tullahoma City Board of  
 17 Education --  
 18 A. Yes.  
 19 Q. -- Suspension Policy?  
 20 A. Yes.  
 21 Q. Okay. When -- and we can put this document  
 22 down just for right now. When a student is  
 23 suspended for misconduct, who is responsible for  
 24 informing the parent?  
 25 A. Typically, it would be the -- the

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1 administrator who did the -- who had -- who did the  
 2 suspension.  
 3 Q. Turning your attention back to Exhibit 30, I  
 4 think. You -- I'd like to direct your attention to  
 5 the second page --  
 6 A. Uh-huh.  
 7 Q. -- at Line 9. And it reads: When a student  
 8 is suspended, the principal shall notify the  
 9 parent(s), guardian(s), and the Director of  
 10 Schools/Designee of the following: A student's  
 11 suspension, cause for the suspension, and any  
 12 conditions for readmission, which may include a  
 13 meeting of the parent(s), guardian(s), student, and  
 14 the principal. Did I read that right?  
 15 A. Uh-huh. Correct.  
 16 Q. What -- when you were principal at Tullahoma  
 17 High School, did you follow this policy?  
 18 A. Yes.  
 19 Q. Can you recall any instances in which you  
 20 didn't?  
 21 A. I think the -- I think what we're looking  
 22 at -- and I see it in Line 5, "designee", the office  
 23 or the principal or designee. There were many, many  
 24 times when -- if a student is suspended, somebody  
 25 from the principal's office, myself,

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1 Mr. Crutchfield, it could have been Dr. Flowers. It  
 2 could have been Ms. Kinsey. It could have been  
 3 Dr. English when he served as my Assistant  
 4 Principal. They would make that call. They would  
 5 call the -- the parent.  
 6 So the principal -- the head principal is not  
 7 always the one that's going to call the parent. It  
 8 could fall to whoever was investigating it and --  
 9 and serve -- and laid out that suspension.  
 10 Q. If I look down -- if you look down a little  
 11 bit further down to Line 30 --  
 12 A. Uh-huh.  
 13 Q. -- on the same page, I'm not going to read  
 14 the whole paragraph. I just want to make sure my  
 15 understanding of Tullahoma City Schools is correct.  
 16 Am I -- am I correct that suspensions are only  
 17 appealable to the school district itself if they're  
 18 longer than ten days?  
 19 A. According to this document, yes.  
 20 Q. Actually, before we depart from this  
 21 document, one more question about sort of informing  
 22 the parents/guardians of a student's suspension,  
 23 cause of the suspension, and conditions for  
 24 readmission. Is that notification process  
 25 important?

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1 A. If a student has been suspended? Absolutely.

2 Q. Why is it important?

3 A. Well, if the suspension occurs during the

4 day, during the school day, we want to make sure

5 that if the student is suspended, they are suspended

6 as of that moment, that that student would have

7 appropriate transportation home. Typically that

8 would require -- if it's during the day, typically

9 that would require a parent to come.

10 We've had suspensions after school where we

11 don't require that, especially if a student is

12 driving, has -- has the ability to drive, where we

13 would not require that parent to come. But we

14 definitely make sure that the parents are aware that

15 they're suspended.

16 Q. I see here on Line 20 that there's a separate

17 type of suspension called in-school suspension. Is

18 it fair to say that an in-school suspension is a

19 lesser sanction than an out-of-school suspension?

20 A. Yes.

21 Q. At Tullahoma High School in the 2022 through

22 '23 school year, what was your understanding of

23 which offenses were subject to in-school suspension

24 and which offenses were subject to out-of-school

25 suspension? Who -- who makes the decision as to the

Page 54

1 level of discipline?

2 A. Typically it would be the administrator

3 that's handling that. The -- the disciplinary

4 approach is, you know, what works for one student

5 doesn't work for the other. And so you have to find

6 out what -- what will make sure that -- that the

7 proper punishment is given to affect change in the

8 behavior.

9 Q. You said an administrator that is handling

10 that. What do you mean by that?

11 A. You're going to have to refresh my memory on

12 what was said.

13 Q. You said that -- that the administrator who's

14 making the decision between in-school and

15 out-of-school suspension --

16 A. Uh-huh.

17 Q. -- that the decision on whether it's in

18 school or out of school would typically be made by

19 the administrator who's handling -- who's handling

20 that. By "that" did you mean a particular instance

21 of student discipline? I just want to --

22 A. No. Who is -- who is working with the

23 student or students and their behavior.

24 Q. Does that mean the administrator who's

25 handling the investigation or the administrator who

Page 55

1 has the closest relationship with the student?

2 A. Investigation.

3 Q. How is it decided which administrator would

4 lead the investigation?

5 A. Whichever -- typically it would be

6 Mr. Crutchfield who is over discipline and should he

7 not be able to be available, then it would be

8 whoever had to -- whoever took -- took that upon

9 themselves, whichever administrator on top of --

10 outside of Mr. Crutchfield.

11 Q. As principal of Tullahoma High School, who

12 did you ultimately report to?

13 A. Dr. Stephens.

14 Q. And does Dr. Stephens report to the Board of

15 Education?

16 A. Correct.

17 Q. The school district policies, is it fair to

18 say that these are binding on school principals in

19 the -- in Tullahoma City Schools?

20 A. Binding with the caveat that the high school

21 also has additional opportunities for policy on top

22 of that. Example -- I'll leave that.

23 Q. Is -- is it fair to say that if a Tullahoma

24 City Board of Education policy says that a principal

25 either must or must not do something, that that's

Page 56

1 something that's binding on principals within the

2 school district?

3 A. Typically, yes.

4 Q. So in other words these policies aren't

5 discretionary. That's probably a better way of

6 asking it.

7 A. I don't know if I can make that

8 determination. For example, I don't believe that

9 this is an all inclusive list of things that could

10 be or could not be considered for suspension.

11 I don't think that there's -- there's a way

12 for -- as soon as -- as soon as we think we've seen

13 it all, we haven't seen it all, and then there may

14 be -- and that's why you will see policy changes or

15 policy additions because something that wasn't

16 addressed in a policy would be, Hey, we -- we never

17 thought of that. We need to redo the policy or we

18 need to add to the policy or whatever.

19 So I think that's why you see policy changes

20 in any form or fashion because they didn't address

21 something that was unforeseen.

22 Q. Was it -- was it part of your job to follow

23 Tullahoma City Board of Education policies?

24 A. Typically, yes.

25 Q. When would it not be part of your job?

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1 A. Re-tweet is more of what I do.  
 2 Q. How about liking posts?  
 3 A. Yeah, I do.  
 4 Q. Okay. How often would you say you -- you  
 5 open Twitter? Daily?  
 6 A. Yes.  
 7 Q. And as a millennial I will assure you there  
 8 is no shame in how you answer this question. Would  
 9 you say you open Twitter more or less than five  
 10 times a day?  
 11 A. Less. I basically use it for two things.  
 12 One is news feed. And number two is to keep up with  
 13 the different teams, departments within Tullahoma  
 14 High School to support what they're doing.  
 15 Q. And is that what you've used it for since you  
 16 got the account?  
 17 A. Yes.  
 18 Q. Would you say your level of usage of Twitter  
 19 has stayed about the same?  
 20 A. Yeah. Yes, sir.  
 21 Q. What's your understanding of how Instagram  
 22 works?  
 23 A. I have no true understanding of how Instagram  
 24 works.  
 25 Q. Do you know what Instagram stories are?

Page 62

1 A. No.  
 2 Q. Do you recall ever having a better  
 3 understanding of how Instagram works?  
 4 A. No.  
 5 Q. Have you visited an -- an Instagram page  
 6 before?  
 7 A. No. And I'll tell you why. If I were to  
 8 click on something, it's going to say I need to open  
 9 up an account or something like that. And I'm  
 10 not -- I don't -- I'm not doing that, so I just --  
 11 no.  
 12 Q. Before August 10th of 2022, had you visited  
 13 I.P.'s Instagram page?  
 14 A. No.  
 15 Q. Before August 10th of 2022, had you seen any  
 16 of I.P.'s Instagram posts?  
 17 A. No.  
 18 Q. Before August 10th of 2022, had you visited  
 19 any student's Instagram page?  
 20 A. No.  
 21 Q. Before August 10th of 2022, had you seen any  
 22 students Instagram page?  
 23 A. I would say yes.  
 24 Q. Tell me about that.  
 25 A. It -- it would have been a screenshot more

Page 63

1 than likely.  
 2 Q. Do you recall when that was?  
 3 A. I do not.  
 4 Q. Do you recall what the occasion was for you  
 5 seeing it?  
 6 A. If I recall, there was an issue with some --  
 7 for lack of a better team, mean girl stuff, with the  
 8 band, that a mother brought to my attention as her  
 9 daughter was being bullied.  
 10 Q. So is it your recollection that the daughter  
 11 was being bullied on social media?  
 12 A. My recollection is the mother presented me  
 13 with snapshots showing that her daughter was being  
 14 bullied by others in the band, and she brought that  
 15 to my attention and was very concerned.  
 16 Q. Was this during your time at Tullahoma?  
 17 A. Yes.  
 18 Q. Other than that screenshot do you recall any  
 19 other instances in which you've seen a student's  
 20 Instagram page?  
 21 A. Before August 10th?  
 22 Q. Correct.  
 23 A. I don't recall.  
 24 MR. FITZPATRICK: All right. If we  
 25 could hand him Exhibit Number 4, please.

Page 64

1 (WHEREUPON, the reporter passed a  
 2 document to the witness.)  
 3 BY MR. FITZPATRICK:  
 4 Q. Have you seen this before?  
 5 A. Yes.  
 6 Q. When was the first time you saw it?  
 7 A. I think that's when Dr. Flowers showed it to  
 8 me.  
 9 Q. Tell me about that.  
 10 A. I believe -- I believe that's the one where  
 11 she was able to look at a page and showed me that.  
 12 Q. So tell me about that -- that conversation.  
 13 Who -- who began that conversation?  
 14 A. Which conversation?  
 15 Q. So I believe you just told me that this came  
 16 to your attention, you think, because Dr. Flowers  
 17 showed it to you?  
 18 A. This particular one, I believe, may have come  
 19 from Dr. Flowers.  
 20 Q. Okay. When do you recall Dr. Flowers showing  
 21 it to you?  
 22 A. On -- on August 10th.  
 23 Q. Do you recall what time of the day?  
 24 A. After lunch.  
 25 Q. What did she tell you about it?

Page 65

1 A. I don't think she told me anything. I think  
 2 she showed it to me.  
 3 Q. Where were you at the time?  
 4 A. In the hallway of -- next to the gym.  
 5 Q. So to make sure I understand, you're in the  
 6 hallway next to the gym and Dr. Flowers comes up and  
 7 shows you this image; is that correct?  
 8 A. It's -- I don't have that recollection. No,  
 9 sir.  
 10 Q. What do you recollect?  
 11 A. When I saw this?  
 12 Q. Uh-huh. I'm sorry. Yes.  
 13 A. I cannot tell you exactly when I saw this.  
 14 The first moment I cannot tell you.  
 15 Q. Had you seen it before I.P. was suspended?  
 16 A. Yes.  
 17 Q. What was your reaction to when you saw it?  
 18 A. To this specific one?  
 19 Q. Yeah.  
 20 A. Because if I'm not mistaken, there were three  
 21 that -- that were there. I didn't like it. This  
 22 one didn't bother me -- this one was not as  
 23 bothersome to me as the other two --  
 24 Q. I'm sorry. I didn't mean to interrupt you.  
 25 A. -- as the other two.

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1 Did this image to your knowledge cause any students  
 2 to violate school rules?  
 3 A. Say that again, sir.  
 4 Q. Did this image to your knowledge cause any  
 5 students to violate school rules?  
 6 A. I don't recall.  
 7 Q. Did this image cause you to think that it  
 8 might disrupt school in the future?  
 9 A. This particular image, no, not -- not to my  
 10 knowledge.  
 11 Q. Did any students complain to you about this  
 12 post?  
 13 A. This post or this image?  
 14 Q. Exhibit 4. Did any students complain to you  
 15 about the post here in Exhibit 4?  
 16 A. No, sir.  
 17 Q. Did any teachers complain to you about the  
 18 post here in Exhibit 4?  
 19 A. No, sir.  
 20 Q. Did any parents complain about the post here  
 21 in Exhibit 4 to your knowledge?  
 22 A. Not to my knowledge.  
 23 MR. FITZPATRICK: Mr. Quick, if I could  
 24 direct your attention to Exhibit Number 3 now,  
 25 please.

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1 Q. You said you didn't like it. Why didn't you  
 2 like it?  
 3 A. I don't -- I don't like somebody using the --  
 4 the term "On God". That bothers me tremendously. I  
 5 think that's disrespectful and blasphemous.  
 6 I don't like the terminology, "Brotha". I  
 7 don't think that that is appropriate in any form or  
 8 setting. And I would say any male does not want to  
 9 be referred to as a sister because that has  
 10 demographic racial overtone that I think society  
 11 looks at.  
 12 Q. Is there a racial overtone?  
 13 A. "Brotha"?  
 14 Q. Is there anything else about the image you  
 15 don't like?  
 16 A. No. No, sir.  
 17 Q. When Dr. Flowers showed you this image, was  
 18 anyone else there?  
 19 A. I cannot recall because I cannot recall  
 20 exactly my -- the first time I saw this image.  
 21 Q. Do you recall this image disrupting any  
 22 classes?  
 23 A. This particular image? I do -- I do not  
 24 recall.  
 25 Q. Do you recall if this image -- strike that.

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1 (WHEREUPON, the reporter passed a  
 2 document to the witness.)  
 3 BY MR. FITZPATRICK:  
 4 Q. Mr. Quick, have you seen this -- this post  
 5 before?  
 6 A. Yes, sir.  
 7 Q. When was the first time you saw it?  
 8 A. I cannot recall.  
 9 Q. Do you recall if you -- strike that. Did you  
 10 see this image for the first time on August 10th,  
 11 2022?  
 12 A. Yes.  
 13 Q. Did you first see this image at the same time  
 14 as you saw Exhibit -- the image in Exhibit 4?  
 15 A. Yes.  
 16 Q. And so the first time you saw this image  
 17 would have been when Dr. Flowers brought it to your  
 18 attention; is that fair?  
 19 A. That would be fair.  
 20 Q. What was your reaction to seeing the post  
 21 here in Exhibit 3?  
 22 A. Disappointing.  
 23 Q. Tell me about that.  
 24 A. Disappointing that our school has focused on  
 25 social media citizenry and bullying more than

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**1 objectionable.**

2 Q. Is that connection between the cat ears and

3 whiskers and this incident with the litter box, is

4 that something you discussed with I.P. on August

5 10th?

6 **A. No, sir.**

7 Q. Is it something you discussed with I.P.'s

8 mother on August 10th or after?

9 **A. Not to my recollection.**

10 Q. Did you discuss it with anybody on August

11 10th?

12 **A. I think it was overall considered. I believe**

13 **I generalized it as embarrassing.**

14 Q. Okay. So I want to make sure I get an answer

15 to my question. This connection that you're talking

16 about today of you making a connection between the

17 -- the cat ears, and the cat whiskers, and this sort

18 of litter box conspiracy theory from elsewhere.

19 Before today have you discussed your belief that

20 there's a connection between those two things with

21 anybody else?

22 **A. Other than counsel?**

23 Q. Yeah, other than counsel.

24 **A. Could you ask that question again? I just**

25 **want to make sure I'm getting it correct.**

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1 Q. Sure. So before today, and excluding any

2 discussions with counsel, had you told anyone of

3 your belief that there was some sort of connection

4 between the cat whiskers and cat ears on this

5 picture and the litter box conspiracy theory?

6 **A. The only person I would have spoken to**

7 **regarding my thoughts on that would have been**

8 **counsel.**

9 Q. Okay. Let's go to the hearts. Why did you

10 find the hearts objectionable?

11 **A. Well, can we go to another area that would go**

12 **back to the hearts? Let me -- it's a sequential**

13 **thought process.**

14 **I have an apron or this -- this figure has an**

15 **apron on, and then you have the caption, "Neko",**

16 **then you have the hearts. That has romantic, sexual**

17 **overtones to it that combined with furies all makes**

18 **that picture, so I don't think you can just separate**

19 **all of it.**

20 Q. When did you learn what -- what's your

21 understanding of what Neko means?

22 **A. Oh, see, I didn't even know it was -- oh,**

23 **it's Neko?**

24 Q. Neko. Neko. Whichever it is, what is your

25 understanding of what that word means? Actually,

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1 let me rephrase that question. What was your

2 understanding of what that word means on August

3 10th, 2022?

4 **A. I had no -- I had no understanding what that**

5 **word meant at that moment. Not at that moment.**

6 **However --**

7 Q. Hold on. Hold on.

8 **A. Will you let me finish?**

9 Q. Go ahead.

10 **A. However, I may say something that you're**

11 **going to like.**

12 Q. Go for it.

13 **A. If you take the whole context of this**

14 **picture, there was very little assumption that that**

15 **was going to be a positive -- Neko meant something**

16 **positive in any way, shape, form, or fashion.**

17 Q. Do you know what Neko means in Japanese?

18 **A. Yes, sir, I do.**

19 Q. Do you know it means cat?

20 **A. That's one version.**

21 Q. All right. Let's go to the hearts. Why did

22 you find the hearts objectionable?

23 **A. Love. This -- this gives off the presence**

24 **that someone -- that this person is looking for love**

25 **and is not the person that's portrayed in the**

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**1 picture. You asked for my interpretation. That's**

**2 my interpretation. It may not be yours, but that**

**3 one's mine.**

4 Q. Is there anything else about the image you

5 found objectionable?

6 **A. The things I find objectionable are the furry**

7 **cat features, the -- the servant apron, and the**

8 **hearts, and basically just being in a dress.**

9 Q. Why did you object to being shown in a dress?

10 **A. Because that's not who I am. I don't wear**

11 **dresses nor -- I'll just leave it at that. I don't**

12 **wear dresses.**

13 MR. FITZPATRICK: We've been going about

14 an hour.

15 THE VIDEOGRAPHER: Yes.

16 MR. FITZPATRICK: Is this a good place

17 to stop and change tapes?

18 THE VIDEOGRAPHER: It certainly is.

19 MR. FITZPATRICK: Okay.

20 THE VIDEOGRAPHER: We are off the record

21 at 11:02 a.m.

22 (Off the record.)

23 THE VIDEOGRAPHER: We're back on the

24 record at 11:11 a.m.

25 //

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1 BY MR. FITZPATRICK:  
 2 Q. Mr. Quick, do you understand you're still  
 3 under oath?  
 4 A. Yes, sir.  
 5 Q. Going back to the post at Exhibit 3 that  
 6 we've been talking about, did the post make you feel  
 7 embarrassed?  
 8 A. I was embarrassed.  
 9 Q. Why were you embarrassed?  
 10 A. Because no one should be subjected to being  
 11 placed in that kind of a picture, post, whatever.  
 12 So I was embarrassed by that.  
 13 Q. So the post here on Exhibit 3, are you aware  
 14 of this post disrupting any classes at Tullahoma  
 15 High School?  
 16 A. No.  
 17 Q. Are you aware of exhibit -- the post in  
 18 Exhibit 3 causing any students to violate school  
 19 rules?  
 20 A. No.  
 21 Q. Did the post here cause you to think that the  
 22 school might be disrupted in the future?  
 23 A. I'm sorry. Say that question again.  
 24 Q. Did the post that we've been talking about  
 25 here on Exhibit 3, did it cause you to think that

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1 school might be disrupted in the future?  
 2 A. It could, yes.  
 3 Q. And why did you think that?  
 4 A. It's simple. Once -- if it gets out into  
 5 circulation, then it causes disruption in the  
 6 classroom and in the hallways, wherever learning is  
 7 to occur.  
 8 Q. Why do you think it would cause disruption?  
 9 A. Because, again, it's a depiction of someone  
 10 in a very unflattering, sexually contextualized  
 11 picture that would cause a distraction to learning.  
 12 Q. Had any teachers reported to you that the  
 13 post here in Exhibit 3 was disrupting their lessons?  
 14 A. No. No, sir.  
 15 Q. And as we sit here today, have any teachers  
 16 informed you that the image here in Exhibit 3  
 17 disrupted their lessons?  
 18 A. No, sir.  
 19 Q. Did any students complain to you about the  
 20 image here in Exhibit 3?  
 21 A. No, sir.  
 22 Q. Did any teachers complain to you about the  
 23 post here in Exhibit 3?  
 24 A. No, sir.  
 25 Q. Did any parents complain about the post in

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1 Exhibit 3?  
 2 A. No, sir. Before we move on I'd like to just  
 3 make one more comment about that.  
 4 Q. I don't have a question pending. So if it  
 5 fits in response to one of my other questions,  
 6 that's fine.  
 7 A. Sure.  
 8 Q. On August 10th of 2022 did you voice concerns  
 9 to anyone that you believed the post here in  
 10 Exhibit 3 sexualized you?  
 11 A. Ask that again. I'm sorry.  
 12 Q. On August 10th, 2022, did you communicate to  
 13 anyone that you thought the post here on Exhibit 3  
 14 sexualized you?  
 15 A. I cannot say that for certain.  
 16 Q. But sitting here today you don't recall  
 17 making such communication, do you?  
 18 A. I know Mr. Crutchfield and I had a  
 19 conversation as we looked at this, and I do remember  
 20 explaining my thoughts on what this could be.  
 21 Q. But sitting here today you don't recall  
 22 communicating to Mr. Crutchfield that you thought  
 23 this image sexualized you, do you?  
 24 A. I cannot say for certain one way or the  
 25 other. However, I do see -- again, on Exhibit 3 I

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1 would think that most -- my impression of most men,  
 2 if they were portrayed with cat ears and furries  
 3 that had the dress and then they had the skirt and  
 4 the whole thing and hearts and all that, but in the  
 5 upper right-hand corner, you see "Nya", I think  
 6 that's a pretty embarrassing picture to put the  
 7 cherry on top.  
 8 Q. What was your understanding of what --  
 9 A. Nya stands for?  
 10 Q. Did you have on -- on August -- August 10th,  
 11 2022, did you have an understanding of what it  
 12 meant?  
 13 A. N-Y-A?  
 14 Q. Yeah.  
 15 A. I know what it represented when you say it.  
 16 Q. What was that?  
 17 A. Nya. I'm also aware that Neko is also  
 18 Japanese. It talks about forms of submission --  
 19 submission, and then if you add the term "Nya" on  
 20 top of that, I don't think two plus two equals four  
 21 is a hard tawl on this one. Did I -- did I put all  
 22 that together on -- in August of 2022? The "Nya"  
 23 part was very concerning to me.  
 24 Q. Okay. So can I ask the question you posed to  
 25 yourself but didn't answer?

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1 MR. SPINING: Objection to the form.  
 2 You may answer.  
 3 THE WITNESS: Yes.  
 4 BY MR. FITZPATRICK:  
 5 Q. How did you first learn that Neko had  
 6 alternate meanings?  
 7 MR. SPINING: I'm going to have to  
 8 assert the privilege to the question. My -- you  
 9 know, my -- if you don't mind?  
 10 MR. FITZPATRICK: Of course.  
 11 MR. SPINING: My suggestion -- it's your  
 12 deposition. If maybe you give a time -- time frame,  
 13 if before engagement of counsel, did he do any of  
 14 his own investigation. That would -- if we could  
 15 make a clear demarcation between the time that  
 16 counsel was engaged and interacted in privileged  
 17 communications, then --  
 18 MR. FITZPATRICK: Sure.  
 19 MR. SPINING: -- I don't know --  
 20 MR. FITZPATRICK: So I will ask that  
 21 question.  
 22 BY MR. FITZPATRICK:  
 23 Q. Before the engagement of counsel, did you  
 24 have any knowledge of the alternate meanings of  
 25 Neko?

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1 A. I don't recall.  
 2 MR. FITZPATRICK: And so to go back to  
 3 my former question -- and I understand your  
 4 objection, and I want to sort of layout here how I'm  
 5 thinking about it.  
 6 You know, privilege obviously protects  
 7 things that are -- that go back and forth in  
 8 furtherance of -- provision of -- of legal advice.  
 9 But what's not protected is if information comes in  
 10 from -- if you learn -- if you learn something from  
 11 counsel, I'm entitled to, you know, know how  
 12 somebody acquired information. They can't say,  
 13 Well, I know these things. How did you know? Well,  
 14 it's -- it's a secret. I mean, is that fair?  
 15 MR. SPINING: I don't think so.  
 16 MR. FITZPATRICK: Okay. Then maybe the  
 17 best way to handle it is I'll ask my question, and  
 18 then if you want to make a priveleged objection and  
 19 stand on it, we can just sort of make our record and  
 20 move on from there. Is that fair?  
 21 MR. SPINING: That's fair.  
 22 BY MR. FITZPATRICK:  
 23 Q. Okay. But I'm still going to make one more  
 24 run in asking this in a way that won't draw an  
 25 objection.

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1 Without telling me who, is the fact that Neko  
 2 had multiple meanings something that you learned on  
 3 your own from an investigation you undertook of your  
 4 own volition or did you learn that from someone  
 5 else?  
 6 A. I don't recall.  
 7 Q. Okay. All right. Now, let's go to Exhibit  
 8 5, please.  
 9 A. Uh-huh.  
 10 Q. Mr. Quick, have you seen this exhibit before?  
 11 A. Yes.  
 12 Q. When was the first time you saw it?  
 13 A. It would have been in the same time frame as  
 14 I saw Exhibit 3 and 4.  
 15 Q. And so is this one of the images that  
 16 Dr. Stephens would have shown you?  
 17 MR. SELLERS: Object to form.  
 18 BY MR. FITZPATRICK:  
 19 Q. Let me -- I'll -- I'll reask the question.  
 20 Did you see this image for the first time at the  
 21 same time you saw the other two images we've  
 22 discussed today?  
 23 A. Correct.  
 24 Q. What was your reaction to this image?  
 25 A. Confusion.

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1 Q. Tell me more about that.  
 2 A. I don't understand all what it means.  
 3 Q. Did you like it?  
 4 A. No, I didn't like it. I'm sure I didn't.  
 5 Q. Why didn't you like it?  
 6 A. It doesn't seem like a -- a portrayal of  
 7 something that I would encourage or that I would  
 8 find acceptable. It -- it makes no sense to me.  
 9 Q. What about it did you find unacceptable?  
 10 A. I don't understand what "Don't Leave" --  
 11 whatever that is -- "Leave Me" or whatever. I don't  
 12 understand what that means. I don't understand what  
 13 the thing is coming out of his wing, up the string,  
 14 and up to the top.  
 15 I don't understand what the image is that was  
 16 drawn. If you were to look at it from the beginning  
 17 initially, you would see that there -- there could  
 18 be some -- could be some negative connotation there,  
 19 sexual overtone, but I just found it very confusing.  
 20 Q. You viewed this image as having sexual  
 21 overtones?  
 22 A. At that moment I wasn't sure but -- I wasn't  
 23 sure at that moment, but I did have suspicions based  
 24 on what else I had seen.  
 25 Q. On August 10th, 2022, did you communicate to

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1 MR. SPINING: He's going to ask -- ask  
 2 the questions. You try to answer the best you can.  
 3 THE WITNESS: I'm trying to make my  
 4 point.  
 5 BY MR. FITZPATRICK:  
 6 Q. Going back to Exhibit 5. Are you aware of  
 7 this post disrupting any classes at Tullahoma High  
 8 School?  
 9 A. No.  
 10 Q. Are you aware of the post here in Exhibit 5  
 11 causing any students to violate school rules?  
 12 A. No. No. No.  
 13 Q. Did the post here in Exhibit 5 cause you to  
 14 think that the school might be disrupted in the  
 15 future?  
 16 A. There was a possibility, yes.  
 17 Q. Why did this image cause you to think that  
 18 school might be disrupted in the future?  
 19 A. Because of the way it's set up. I don't  
 20 expect it to be flattering. And, again, disruptive  
 21 means taking your eye off what you're supposed to be  
 22 doing as a student or a teacher and putting it on  
 23 something like this.  
 24 Q. So in your view disruption could mean  
 25 something as little as a student seeing it on their

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1 Instagram page?  
 2 A. That's not what I would consider to be a  
 3 school distraction. That would be a student  
 4 distraction. If multiple, multiple students, then  
 5 that would become a growing distraction.  
 6 Q. And do you equate distraction with  
 7 disruption?  
 8 A. Yes.  
 9 Q. So -- and I want to make -- and I want to  
 10 make sure I understand you, so please do correct me  
 11 if -- if I'm wrong. Do I understand you to say that  
 12 if -- if there's something that is attracting a  
 13 large amount of attention from students, in your  
 14 view that -- that could be disruptive?  
 15 A. Yes.  
 16 Q. Now, I was driving by, I -- I think, the  
 17 football field that Tullahoma High School plays at  
 18 this morning. And I saw a sign that said 4A State  
 19 Champs. Was that the Tullahoma High School football  
 20 field?  
 21 A. Yes, sir.  
 22 Q. And I think I remember the sign saying for 4A  
 23 Champs 2021, right?  
 24 A. Yes, sir.  
 25 Q. I would imagine that when a high school team

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1 makes state and wins state, it's a topic of  
 2 considerable discussion amongst the student body; is  
 3 that fair?  
 4 A. Yes.  
 5 Q. If a student posts something on Instagram,  
 6 let's say it's a video of a winning play from a  
 7 football game?  
 8 A. Uh-huh.  
 9 Q. Would you consider that disruptive?  
 10 A. It depends on what happened with that  
 11 display.  
 12 Q. Tell me about that.  
 13 A. Well, I mean, are you talking about 1  
 14 student, 5 students, 20 students?  
 15 Q. So if -- if -- let's say a student posts a  
 16 video of that winning play on Instagram --  
 17 A. Uh-huh.  
 18 Q. -- and assume the student body is still  
 19 really excited about the win --  
 20 A. Uh-huh.  
 21 Q. -- and lots of people want to rewatch the big  
 22 moment or something like that --  
 23 A. Uh-huh.  
 24 Q. -- does that -- does that mean in your view  
 25 that the original post of that video footage is

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1 something that could cause disruption in the school?  
 2 MR. SPINING: Object to the form of the  
 3 question. You may answer.  
 4 THE WITNESS: I'm sure it could.  
 5 BY MR. FITZPATRICK:  
 6 Q. So with respect to the distraction and  
 7 disruption that you've voiced or worried that  
 8 Exhibits 3 and 5 could cause, is that sort of in the  
 9 same thing that could cause distracted students?  
 10 A. I'm sorry. You'll need to give me that one  
 11 again -- the question again.  
 12 Q. Sure. I want to make sure I understand your  
 13 -- your response to my question about Exhibits 3 and  
 14 5 --  
 15 A. Uh-huh.  
 16 Q. -- when you said that you thought this could  
 17 lead to -- there was a potential for it to disrupt  
 18 school?  
 19 A. Uh-huh.  
 20 Q. Am I correct in understanding that your  
 21 belief is that the images were of such a nature that  
 22 it could attract attention, and that the attention  
 23 attracted would distract people from their lessons?  
 24 A. Yes.  
 25 Q. For a post like that, does it make any

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1 you know, do self-development type of work, as  
 2 opposed to being in a classroom, and it was  
 3 disruptive during that time.  
 4 Q. During PAWS -- during the PAWS period in --  
 5 in the gym, were students forbidden from --  
 6 forbidden from speaking to one another?  
 7 A. I -- I cannot tell you. I'm -- being in the  
 8 gym, being a large area, there were several classes  
 9 that would sign up to participate in the gym,  
 10 somewhere -- a physical nature, physical activity  
 11 kind -- kind of work. Others were support groups  
 12 and some other things that would occur, so it  
 13 wasn't -- it could have been a number of any classes  
 14 that were in there.  
 15 Q. So is it fair to say that if there were a  
 16 number of classes going on, that it likely wasn't a  
 17 quiet -- a quiet environment? There were different  
 18 things going on in different corners?  
 19 A. I can't tell you what the environment on that  
 20 day would have been.  
 21 Q. What's the basis of your belief that it  
 22 disrupted the environment?  
 23 A. It was my understanding and told to me that  
 24 many students received it, opened it up, and were  
 25 very -- I don't know what the word would be --

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1 activated, let's just say, whatever -- you know,  
 2 Hey, look at this. And then whatever they did, they  
 3 could send it. They could show it.  
 4 They could do whatever they wanted to with  
 5 it, and that would have -- that's a disruption or a  
 6 distraction in the school day -- in the school  
 7 setting -- a school setting.  
 8 Q. I'm sorry. You said you were told. Who told  
 9 it to you?  
 10 A. The student that brought that to me.  
 11 Q. What specifically do you remember that she  
 12 told you?  
 13 A. It was airdropped during that time. There  
 14 was many people in the gym, and that that was a  
 15 source of disruption, distraction, discussion,  
 16 however you want to call it at that time.  
 17 Q. Did she use any of those words?  
 18 A. No. No, sir.  
 19 Q. What words did she use?  
 20 A. I cannot recall.  
 21 Q. In the PAWS program for the different --  
 22 would sessions be the right word?  
 23 A. Uh-huh. Well, we call them class but  
 24 sessions or whatever.  
 25 Q. For the different classes going on in PAWS,

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1 do those have instructors?  
 2 A. Yes.  
 3 Q. Does each one have an instructor?  
 4 A. Yes.  
 5 Q. Did you receive reports from any of the  
 6 instructors in the gym that these images were  
 7 causing a disruption -- pardon me -- that this image  
 8 in Exhibit 1 was causing a disruption?  
 9 A. No, sir.  
 10 Q. In the course of investigating this image,  
 11 did you ask any of the instructors for the PAWS  
 12 programs in the gym at the time, whether the image  
 13 had caused disruption?  
 14 A. No, sir.  
 15 Q. To your knowledge did anyone at Tullahoma  
 16 High School in the course of investigating this  
 17 image ask the instructors in the PAWS classes in the  
 18 gym whether they were causing disruption?  
 19 A. I have no knowledge one way or the other.  
 20 Q. Other than the PAWS classes in the gym that  
 21 we just talked about, are you aware of the image in  
 22 Exhibit 1 causing disruption in any other classes?  
 23 A. Classes? No, not classes. In the school  
 24 setting of a lunchroom, yes.  
 25 Q. Tell me what happened in the lunchroom.

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1 A. It's my understanding the young lady that  
 2 brought this to me was in the cafeteria where this  
 3 picture was being shown to many throughout, and it  
 4 was overheard or told -- I don't know how she -- but  
 5 that -- kind of the genesis of how that picture got  
 6 into circulation.  
 7 Q. So what -- what was the disruption?  
 8 A. Again, students are supposed to be seated.  
 9 It's supposed to be lunch. Lunch is part of the  
 10 school setting.  
 11 It's all about the culture, and there were  
 12 many in -- in the lunchroom that were distracted --  
 13 disturbance, whatever, very concerned -- let's put  
 14 it that way -- about that picture being circulated.  
 15 Q. You said students were concerned about the  
 16 picture?  
 17 A. That's my understanding.  
 18 Q. Are you aware of any students other -- strike  
 19 that question. Other than A.L. --  
 20 A. Uh-huh.  
 21 Q. -- did any student express to you a concern  
 22 about the image?  
 23 A. No, sir.  
 24 Q. In -- in August of 2022 at Tullahoma High  
 25 School during the lunch period, were students

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1 allowed to have their phones out?  
 2 A. Yes.  
 3 Q. Other than the lunchroom and the PAWS classes  
 4 that we've talked about --  
 5 A. Uh-huh.  
 6 Q. -- are you aware of the image here in Exhibit  
 7 1 causing any other disruption or disturbance at  
 8 Tullahoma High School?  
 9 A. No, sir.  
 10 Q. Are you aware of any instances of the image  
 11 here in Exhibit 1 causing students to violate school  
 12 rules?  
 13 A. Say that again. I'm sorry.  
 14 Q. Are you aware of any instances of the image  
 15 here in Exhibit 1 causing Tullahoma High School  
 16 students to violate school rules?  
 17 A. I believe the person who had that listed on  
 18 their account violated school rules.  
 19 Q. So my question is a little bit different. My  
 20 question is: Are you aware of any instances of this  
 21 image causing -- this image being Exhibit 1 --  
 22 causing another student to break a school rule?  
 23 A. Outside of --  
 24 Q. Outside of the image itself, are you aware of  
 25 any --

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1 A. Outside of the person that that had it posted  
 2 on their --  
 3 Q. Right.  
 4 A. -- Instagram?  
 5 Q. Right. So --  
 6 A. No.  
 7 Q. Okay. So just to make sure I have a --  
 8 A. Yeah.  
 9 Q. -- a clean record. Setting aside whether the  
 10 image itself violated school rules, are you aware of  
 11 any instances of the image here in Exhibit 1 causing  
 12 students to violate school rules?  
 13 A. The person that created it and the person  
 14 that has housed it on their -- I'm trying to make  
 15 sure I'm not --  
 16 Q. Okay.  
 17 A. Yeah.  
 18 Q. So -- and I might just not be asking the  
 19 question clean enough. So other than the student  
 20 who posted it or the student who circulated it,  
 21 airdropped it, whatever the verb might be --  
 22 A. Uh-huh.  
 23 Q. -- are you aware of any instances of the  
 24 image here in Exhibit 1 causing other students to  
 25 violate school rules?

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1 A. I believe so. Without naming names it was my  
 2 understanding that other students then started  
 3 sending it out. I can't tell you who or any of  
 4 that. That was my understanding from the PAWS class  
 5 like after it was air dropped. But I can't give you  
 6 like a specific name or those kind of things, but  
 7 that was my general understanding.  
 8 Q. How did you gain that understanding?  
 9 A. The young lady that brought that to me in the  
 10 beginning.  
 11 Q. In the course of investigating student  
 12 misconduct, the investigation that we were talking  
 13 about earlier?  
 14 A. Uh-huh.  
 15 Q. Can part of those investigations be speaking  
 16 with, you know, witnesses and students?  
 17 A. Yes.  
 18 Q. Did you ever take a statement from A.L.?  
 19 A. I don't recall.  
 20 Q. If you had taken a statement, where would it  
 21 have gone?  
 22 A. Either I or Mr. Crutchfield would have had  
 23 that in our possession.  
 24 Q. Would it have been saved somewhere?  
 25 A. It typically would be -- it could have been

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1 scanned. It could have been.  
 2 Q. Fair to say that sitting here today, you  
 3 don't recall taking a statement from --  
 4 A. No, sir. Correct.  
 5 Q. And is it also fair to say that sitting here  
 6 today you don't recall any statement being taken  
 7 from A.L.; is that correct?  
 8 A. Written statement?  
 9 Q. Correct.  
 10 A. No written statement. I don't recall that.  
 11 Q. And is the total of interaction that you had  
 12 with A.L. the discussion when she came into your  
 13 office?  
 14 A. Yes.  
 15 Q. Did you have any follow-up discussions with  
 16 her?  
 17 A. No, sir.  
 18 Q. Are you aware of anyone else having follow-up  
 19 discussions with her?  
 20 A. I'm -- I'm not aware of that.  
 21 Q. With the exception of what we talked about a  
 22 couple minutes ago -- I think you said you  
 23 believe that students started to share this image  
 24 amongst themselves. Do I have that right?  
 25 A. That was my understanding.

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1 the social media policy. I'd like to turn our  
 2 attention to that. And I believe this will be  
 3 marked as Exhibit 31.  
 4 MR. SELLERS: I think it's actually 31.  
 5 MR. FITZPATRICK: Oh, I thought I said  
 6 31.  
 7 MR. SELLERS: Oh. Well, I didn't hear  
 8 you.  
 9 MR. FITZPATRICK: Yes, 31.  
 10 (WHEREUPON, a document was marked as  
 11 Exhibit Number 31.)  
 12 BY MR. FITZPATRICK:  
 13 Q. All right. Mr. Quick, you just mentioned a  
 14 -- I believe you had mentioned -- passing the  
 15 Tullahoma High School Student Handbook.  
 16 A. Uh-huh.  
 17 Q. Is -- Exhibit 31, is that the student  
 18 handbook you were discussing?  
 19 A. Yes, sir.  
 20 Q. And if you look on the very front page, was  
 21 this the student handbook in place for the 2022  
 22 through 2023 school year?  
 23 A. Yes, sir.  
 24 Q. So this would have been in effect on August  
 25 10th, 2022; correct?

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1 A. Yes.  
 2 Q. So I'd like to direct your attention to Page  
 3 9, please. And I would like to direct your  
 4 attention to the third bullet point under  
 5 Videos/Photos. Are you with me so far?  
 6 A. Yes, sir.  
 7 Q. The language that begins with "Any student",  
 8 could you read that out loud, please?  
 9 A. Yes. "Any student who records and/or  
 10 disseminates in any manner an unauthorized or  
 11 misrepresented photograph, video, or recording for  
 12 the purpose of embarrassing, demeaning, or  
 13 discrediting the reputation of any student or staff  
 14 or that results in the embarrassment, demeaning, or  
 15 discrediting of any student or staff or results in  
 16 any action or any activity disruptive to the  
 17 educational process, shall be subject to  
 18 disciplinary action up to and including suspension  
 19 or expulsion at the discretion of the principal."  
 20 Q. And a few minutes ago you mentioned the  
 21 social media policy. Is this what you were  
 22 referring to?  
 23 A. Yes, sir.  
 24 Q. When did this policy go into effect?  
 25 A. As far as like its origin?

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1 Q. Okay.  
 2 A. It was in effect before I came to Tullahoma  
 3 High School.  
 4 Q. So it's fair to say that all of the years  
 5 that you were principal at Tullahoma High School,  
 6 this rule was in effect?  
 7 A. This particular rule, yes, as far as I  
 8 understand.  
 9 Q. And what was your last day as principal at  
 10 Tullahoma High School?  
 11 A. June 30, 2023.  
 12 Q. And you're aware this policy is no longer in  
 13 effect, correct? Are you aware of that?  
 14 A. I had heard that it might. I wasn't aware  
 15 one way or the other.  
 16 Q. Prior to August 10th, 2022, had any students  
 17 to your knowledge been disciplined for violating the  
 18 social media policy?  
 19 A. I would believe so, yes.  
 20 Q. Do you recall any as you sit here today?  
 21 A. I can't specifically recall, but I would  
 22 believe that they were.  
 23 Q. But sitting here today you don't have any  
 24 specific recollection --  
 25 A. No, sir.

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1 Q. -- of any prior punishments?  
 2 A. No, sir. That -- I'm no longer a school  
 3 employee. I don't have access to the database, but  
 4 that's my recollection as I have it right now.  
 5 Q. Do you recall being involved in -- other than  
 6 I.P. -- in punishing any students for violating the  
 7 social media policy?  
 8 A. I can't give you a specific. But I feel very  
 9 comfortable that, yes, I would have been involved.  
 10 Q. Do you remember what the violations were?  
 11 A. Bullying -- bullying would be at the top of  
 12 the list.  
 13 Q. What do you remember about the instances of  
 14 bullying? What was -- what was the social media  
 15 that was at issue there?  
 16 A. A lot of that would have been some kind of --  
 17 I go back to an issue I had with the band program.  
 18 It was some kind of group text application.  
 19 I don't know what that was, but I know that there --  
 20 there was just one handed out from that. I can't  
 21 tell you what that was. I couldn't -- I couldn't  
 22 tell you their names.  
 23 Q. Are you aware of any other instances?  
 24 A. Ask the question again.  
 25 Q. Sure. I'm just wondering if you can

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1 created all of them but the two." Did I read that  
 2 right?  
 3 A. Yes.  
 4 Q. So when you -- you showed him the pictures.  
 5 Did you show I.P. all five pictures that we've  
 6 discussed today?  
 7 A. Yes.  
 8 Q. And if I'm reading this right, it sounds like  
 9 he denied creating two of them; correct?  
 10 A. Yes.  
 11 Q. Which two did he deny creating?  
 12 A. The one with the KKK and the one with Hitler.  
 13 Q. Now, he acknowledged posting the other three;  
 14 correct?  
 15 A. He -- he acknowledged that he created the  
 16 other three.  
 17 Q. And you ask him why he created them; isn't  
 18 that right?  
 19 A. Yes.  
 20 Q. And what do you remember about what he told  
 21 you?  
 22 A. He thought it was funny.  
 23 Q. And I know you wrote that in your statement.  
 24 Do you remember anything more particular about what  
 25 I.P. told you?

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1 A. He thought it was funny.  
 2 Q. Is that a quote or just sort of your general  
 3 remembrance of it?  
 4 A. General remembrance.  
 5 Q. Sitting here today do you have any other  
 6 recollection of what I.P. told you about why he  
 7 created the memes other than what's here in your  
 8 statement?  
 9 A. As to why he created them, no.  
 10 Q. And in the next sentence in your statement  
 11 you wrote, "I explained these types of pictures are  
 12 embarrassing to me and encourages others to make  
 13 similar posts." Did I read that right?  
 14 A. Yes.  
 15 Q. Do you recall what you told I.P.?  
 16 A. Yes.  
 17 Q. Do you recall any of the specifics of what  
 18 you told --  
 19 A. That they were embarrassing to me as being  
 20 the subject of those pictures. Had those pictures  
 21 been of whoever, they would have been embarrassing  
 22 to them.  
 23 Q. But that second part of what you just said,  
 24 did you tell that to I.P.?  
 25 A. I don't recall.

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1 Q. Do you recall any other specifics from that  
 2 meeting of what you told I.P. as to why you found  
 3 any of the posts unacceptable?  
 4 A. That, again, as the statement says, we don't  
 5 want to encourage others trying to make similar  
 6 posts of anybody that would be of that nature  
 7 because that just -- one wants to be better than the  
 8 other, and then the next thing you know that's what  
 9 you have versus what you should have.  
 10 Q. The concerns you had earlier that you voiced  
 11 earlier related to sexual -- sexualization when it  
 12 comes to the Neko quick image that's Exhibit 3, did  
 13 you raise those concerns with I.P. in that meeting?  
 14 A. No, sir.  
 15 Q. Did you ask him for -- strike that. For the  
 16 meeting with I.P. in the front office --  
 17 A. Uh-huh.  
 18 Q. -- did you ask I.P. for an explanation about  
 19 the meaning behind the Neko quick meme?  
 20 A. No, sir.  
 21 Q. Did you ask I.P. for an explanation about  
 22 Exhibit Number 4, the meme showing you holding a box  
 23 of vegetables?  
 24 A. No, sir.  
 25 Q. Did you ask I.P. for an explanation of the

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1 meaning behind the third image with the Blue Jay?  
 2 A. No, sir.  
 3 Q. When I.P. was in the office and you were  
 4 speaking with him, did Mr. Crutchfield and Mr. Scott  
 5 stay the whole time?  
 6 A. Yes, sir.  
 7 Q. At some point during that meeting, did one of  
 8 the three of you ask I.P. to read a -- a policy?  
 9 A. I don't recall.  
 10 Q. Prior to I.P. arriving in the office, had you  
 11 had any discussions with Mr. Scott or  
 12 Mr. Crutchfield about the social media posts?  
 13 A. Say that again, if you will.  
 14 Q. Sure. Prior to I.P. arriving at the front  
 15 office to meet with you?  
 16 A. Uh-huh.  
 17 Q. Had you had any other discussion -- pardon  
 18 me. Had you had any discussions with Mr.  
 19 Crutchfield or Mr. Scott about these images?  
 20 A. I believe I had a conversation with  
 21 Mr. Crutchfield.  
 22 Q. And when was that conversation?  
 23 A. Between Mr. Scott returning to band practice  
 24 and before I.P. and Mr. Scott showed up at my  
 25 office.

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1 at 3:11 p.m.  
 2 (Off the record.)  
 3 THE VIDEOGRAPHER: We're back on the  
 4 record at 3:25 p.m.  
 5 BY MR. FITZPATRICK:  
 6 Q. Mr. Quick, do you understand you're still  
 7 under oath?  
 8 A. Yes, sir.  
 9 Q. Mr. Quick, I appreciate you taking the time  
 10 today to speak with me; and I just have a few more  
 11 questions. And if you'll forgive me, I have  
 12 clean-up questions so they're going to jump around a  
 13 --  
 14 A. Sure.  
 15 Q. -- little bit. I'm not trying to trip you  
 16 up.  
 17 A. Understood.  
 18 Q. When A.L. came to your office, did she bring  
 19 up any of the other three memes?  
 20 A. No, sir.  
 21 Q. Had any student brought up those three memes  
 22 to you?  
 23 A. No, sir.  
 24 Q. Had any teacher brought up those three memes  
 25 to you?

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1 A. No, sir.  
 2 Q. I'll represent to you that I.P. posted the  
 3 Neko quick meme during his summer vacation prior to  
 4 the 2022 through 2023 school year. Now, August  
 5 10th, 2022, that was the second week of school;  
 6 correct?  
 7 A. Yes, sir.  
 8 Q. So in that first week of school, are you  
 9 aware of any students having their studies disrupted  
 10 because of the -- because of the meme?  
 11 A. No, sir.  
 12 Q. Are you aware of any teachers having their  
 13 instruction disrupted because of the Neko quick  
 14 meme?  
 15 A. No, sir.  
 16 Q. Earlier I asked you whether you had asserted  
 17 to I.P. or, I believe, anyone else on August 10th  
 18 that you believed -- that you believed the Neko  
 19 quick meme sexualized you. Do you recall that  
 20 question?  
 21 A. Ask it again, please.  
 22 Q. Sure. Earlier I asked if you recalled ever  
 23 asserting to I.P. on August 10th, 2022, that you  
 24 believed the Neko quick meme sexualized you. Do you  
 25 recall that question?

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1 A. I don't recall the question but...  
 2 Q. So then to make it clean, I'll ask it --  
 3 A. I'm sorry.  
 4 Q. -- again.  
 5 A. Yeah.  
 6 Q. On August 10th, 2022, do you have any  
 7 recollection of asserting to I.P. that the Neko  
 8 quick meme sexualized you?  
 9 A. I did not assert that to him.  
 10 Q. In the subsequent meeting or correspondence  
 11 that you had with B.P., did you assert to her that  
 12 you believed that I.P.'s post sexualized you?  
 13 A. I don't believe that I did, no.  
 14 Q. When conducting the investigation into the  
 15 Hitler and the Klan memes --  
 16 A. Uh-huh.  
 17 Q. -- did anyone -- strike that. When  
 18 investigating the Hitler and the Klan memes, did you  
 19 suggest collecting a statement from R.Y.?  
 20 A. No, I don't recall.  
 21 Q. Do you recall anyone suggesting taking a  
 22 statement from R.Y.?  
 23 A. I don't recall.  
 24 Q. Are you aware of any document or other record  
 25 that would substantiate that an airdrop of an image

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1 took place on August 10th, 2022?  
 2 A. No, sir.  
 3 Q. For any of the five images that we've talked  
 4 about today, are you aware of any student's academic  
 5 performance being harmed because of them?  
 6 A. No.  
 7 Q. For any of the five images that we've talked  
 8 about today, are you aware of any student's mental  
 9 health being affected?  
 10 A. No.  
 11 Q. With respect to any of the five images that  
 12 we've talked about today, are you aware of any  
 13 teacher's lessons being affected?  
 14 A. No.  
 15 MR. FITZPATRICK: I have no further  
 16 questions. I appreciate your time today, Mr. Quick.  
 17 THE WITNESS: Thank you.  
 18 MR. SPINING: None from me.  
 19 MR. SELLERS: No questions.  
 20 THE VIDEOGRAPHER: We are off the record  
 21 at 3:32 p.m., and the deposition is concluded.  
 22 \* \* \*  
 23 THE REPORTER: Just to confirm orders,  
 24 would you like to order his transcript?  
 25 MR. FITZPATRICK: Oh, yes, please.

# EXHIBIT G

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I.P. a minor, by and through B.P.,  
Plaintiff,  
vs. No. 4:23-cv-00026  
TULLAHOMA CITY SCHOOLS, a  
political subdivision of the  
State of Tennessee; JASON QUICK,  
in his individual capacity; and  
DERRICK CRUTCHFIELD, in his  
individual capacity,  
Defendants.

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Deposition of:  
DERRICK CRUTCHFIELD

Taken on behalf of the Plaintiff  
January 17, 2025  
Commencing at 8:52 a.m. (CST)

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REPORTED BY: Tonya D. Stolze, LCR

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For the Defendant, Derrick Crutchfield

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(423)602-9521  
alix@michelandward.com

The deposition of DERRICK CRUTCHFIELD, was  
taken by Notice, at 510 South Jackson Street,  
Tullahoma, Tennessee, on January 17, 2025, for all  
purposes under the Federal Rules of Civil Procedure.

All formalities as to caption, notice,  
statement of appearance, et cetera, are waived. All  
objections, except as to the form of the question,  
are reserved to the hearing, and that said  
deposition may be read and used in evidence in said  
cause of action in any trial thereon or any  
proceeding herein.

It is agreed that TONYA D. STOLZE, LCR,  
Notary Public and Court Reporter for the State of  
Tennessee, may swear the witness, and that the  
reading and signing of the completed deposition by  
the witness was discussed.

\* \* \*

DERRICK CRUTCHFIELD,  
was called as a witness, and after having been duly  
sworn, testified as follows:

## EXAMINATION

QUESTIONS BY Mr. FITZPATRICK:

Q. Good morning, Mr. Crutchfield.

A. Good morning.

Q. Do you understand that you're here today to  
provide testimony in connection with an ongoing  
lawsuit?

A. Yes.

Q. Excellent. And before we get started I'll  
make the same statement for the record that we made  
before the last two depositions, which is that  
counsel have agreed that in order to facilitate a  
worthwhile and conversational deposition, that even  
though this case involves either minors or people  
who were minors when the events took place, we're  
going to use their full names during this  
deposition. And we've agreed that when the court  
reporter transcribes it, it will be transcribed as  
the initials.

MR. FITZPATRICK: Andrew and Alix, is

important that you say out loud yes or no. Make  
sense?

A. Yes.

Q. And the next rule is that it's important that  
you and I don't speak at the same time. It's very  
hard for our court reporter to pick that up.

So I'll let you finish your answers before I  
ask another question, and all I ask is that you make  
sure that I'm done asking my question before you  
start your answer. Fair?

A. Yes.

Q. And if you don't understand one of my  
questions, that's fine. Just let me know and I'm  
happy to rephrase. But if you answer one of my  
questions, I'll assume you understood it. Fair?

A. Yes.

Q. If you need to take a break at any point,  
that's fine. Just let me know. All I ask is that  
if I have a question pending to you, that you answer  
the pending question and then we can take a break.  
Fair?

A. Yes.

Q. From time to time today, one or both of the  
attorneys here today may object to one of my  
questions. That's fine. It's a totally normal part

that acceptable to you? And did I accurately state  
our agreement?

MR. SELLERS: That's correct.

MR. MICHEL: Yes. Thank you.

BY MR. FITZPATRICK:

Q. Mr. Crutchfield, do you understand that your  
testimony today is being given under oath just as if  
you were giving testimony in a courtroom in front of  
a judge and a jury?

A. Yes.

Q. Have you ever given a deposition before?

A. No.

Q. Have you ever testified at a trial before?

A. No.

Q. Have you ever testified under oath before?

A. No.

Q. All right. So I'll go over some ground rules  
just to make sure that you and I are on the same  
page and that you know how this process generally  
works?

A. Okay.

Q. So our court reporter here to my right is  
taking a verbatim transcript of everything we say.  
So it's important that you verbalize your answers.  
That means no shakes of the head or uh-huhs. It's

of the process. But unless it's a privileged  
objection and they instruct you not to answer the  
question, it's important that you allow them to  
finish their objection, but then you still answer  
the question. Does that make sense?

A. Yes.

Q. Mr. Crutchfield, have you consumed any  
alcohol within the last 24 hours?

A. No.

Q. Have you taken anything that could impair  
your memory?

A. No.

Q. Do you have any conditions that affect your  
memory?

A. No.

Q. Could you please state your full name for the  
record?

A. Derrick Leland Crutchfield.

Q. Did you communicate with anyone except your  
counsel about this deposition beforehand?

A. No.

Q. Did you review any documents in preparation  
for this deposition?

A. Yes.

Q. Which documents did you review?

once a school year or -- it's football season. I'll set over-under at one and a half. Would you take the over or the under on how many times that usually happens per school year?

A. Once or twice a year.

Q. So it's fair to say it's quite rare?

A. Yes.

Q. What are the circumstances in which that usually happens?

A. Usually when the person doing the investigation gave me information and they're calling parents, I'll go ahead and take the student and do the punishment or the person that brought it to me is involved in the situation.

Q. So the second instance -- I'm sorry. Any others that you can recall?

A. I cannot recall.

Q. So the second example you gave me, the person that brought -- the person that did the investigation and brought it to you is involved?

A. Uh-huh.

Q. How many times has that happened?

A. Once.

Q. And when was that?

A. With Mr. Quick.

Q. Was it with Mr. Quick and I.P.?

A. Yes.

MR. FITZPATRICK: I'm about to move onto a new subject, so this is probably a good point to take five since we've been going about an hour. Does that work for y'all?

MR. SELLERS: It's fine with me.

MR. MICHEL: Sure.

(Short break.)

BY MR. FITZPATRICK:

Q. We're back on the record, Mr. Crutchfield. Do you understand that we're all -- that you're still under oath?

A. Yes.

Q. Mr. Crutchfield, do you have an Instagram account?

A. Yes.

Q. When did you get it?

A. A couple months ago.

Q. Did you have it during the 2022 through '2023 school year?

A. No.

Q. Well, if you got it a couple of months ago, I gather you didn't have it during the 2022 through 2023 school year, right?

A. The reason I'm thinking about that is this: Sometimes I have accounts and I never use them, and then I go back in and get another one so that's why I was thinking about it.

Q. Do you recall having an Instagram account in August of 2022?

A. No.

Q. What's your current Instagram handle?

A. Dcrutchfield.

Q. All one word?

A. Yes.

Q. Do you have any other social media accounts?

A. No.

Q. Did you have any other social media accounts in August of 2022?

A. No.

Q. What is your understanding of how Instagram works? And by that I mean have you posted stories before?

A. No.

Q. Have you clicked on stories before?

A. Yes.

Q. Do you use Instagram's messaging feature?

A. No.

Q. Before August 2022 had you visited I.P.'s

Instagram page?

A. No.

Q. Before August 2022 had you seen any of I.P.'s Instagram posts?

A. No.

Q. Before August 10th of 2022 had you seen any of I.P.'s Instagram posts?

A. No.

Q. Before August of 2022 had you visited any student's Instagram page?

A. No.

Q. All right. So to your left you'll see a stack of exhibits.

A. Okay.

Q. I'd like to direct your attention to Exhibit 4, please.

A. Okay.

Q. Have you seen this before?

A. Yes.

Q. When was the first time you saw it?

A. August the 10th.

Q. Of 2022?

A. Yes.

Q. What was the occasion for you seeing it?

A. I was called into Mr. Quick's office and

shown – this was one of the pictures I was shown.

Q. You say you were called into Quick's office. Was it Mr. Quick that called you in?

A. Yes.

Q. And how did he call you in? Did he call you on the – the phone? Did he holler for you?

A. I cannot remember if it was by radio or by my office phone.

Q. And did you go to his office?

A. Yes.

Q. Was anyone else there?

A. No.

Q. So --

A. I --

Q. Go ahead.

A. I don't recall.

Q. Was this before or after I.P. got there?

A. Before.

Q. So Mr. Quick shows you this image, correct?

A. Yes.

Q. What was your reaction to seeing it?

A. Nothing really jumped out at me.

Q. Let's back up just a little bit. When Mr. Quick called you into his office, what did he say?

MR. FITZPATRICK: Okay. I understand your objection.

MR. SELLERS: Okay.

BY MR. FITZPATRICK:

Q. Just temporally in terms of the interaction between you and Mr. Quick. So I understand it correctly, Mr. Quick called you to his office, relayed to you some information about some pictures that had been brought to his attention by a student and then showed you pictures. Is that an accurate summation of where we are so far in terms of what's happened between you and Mr. Quick?

A. Yes.

Q. Do you recall how many pictures he showed you?

A. Five.

Q. Okay. We'll get to the others. Let's stay with Exhibit 4 right now. Are you aware of the image in Exhibit 4 disrupting any classes at Tullahoma High School?

A. No.

Q. Are you aware of the image in Exhibit 4 causing any students to violate school rules?

A. No.

Q. Are you aware of the image in Exhibit 4

A. He said there was some pictures posted on me by a student, and that another student had brought it to his attention; and she was upset about it.

That's why she brought it to his attention.

Q. Do you remember him saying anything else?

A. No.

Q. So Mr. Quick brings you in and says, There are pictures posted about me. The student brought them to my attention, and then he showed you the pictures; correct?

A. Yes.

Q. Do you recall how many pictures he showed you?

MR. SELLERS: Hold on. Hold on. Object to form. Go -- now -- that was an object to form to the question you just -- the previous question. He answered, and you started a new question before I even had a chance to jump in.

MR. FITZPATRICK: Was the objection compound?

MR. SELLERS: Well -- well, yes, but you didn't -- in the question you didn't state everything he had just told you. You left off about the part that the student was upset.

causing any disruption to teacher's lessons?

A. No.

Q. Does the image in Exhibit 4 give you any reason to think that Tullahoma High School might be disrupted in the future?

A. No.

Q. Did you receive any complaints from students about this post?

A. No.

Q. Did you receive any complaints from teachers about this post?

A. No.

Q. Did you receive any complaints from parents about this post?

A. No.

Q. Are you aware of anyone receiving complaints from parents about this post?

A. No.

Q. Are you aware of anyone receiving complaints from teachers about this post?

A. No.

Q. Are you aware of anyone receiving complaints from students about this post?

A. No.

Q. As far as you're aware do the posts here in

Exhibit 4 have any impact on the operation of Tullahoma High School?

A. Not alone.

Q. Okay. I would like you to turn to Exhibit 3, please.

A. (Complies.)

Q. Have you seen this image before?

A. Yes.

Q. When was the first time you saw it?

A. August 10th.

Q. And is this image one of the ones you saw in Mr. Quick's office?

A. Yes.

Q. Is this one of the images he showed you?

A. Yes.

Q. When he showed you the images, how did he show them to you?

A. They were all five together.

Q. Had he printed them out?

A. I don't recall.

Q. Do you recall if he brought them up on his computer screen?

A. Yes.

Q. He did bring them up on his computer screen?

A. Yes.

Q. Did he bring them up as separate images?

A. No.

Q. How did he bring them up?

A. They're all five in a line.

Q. So let's go back to the image here in Exhibit 3. What was your reaction to seeing it?

A. I was concerned about this one.

Q. Why were you concerned about it?

A. At that time we had a male student in the building who wore skirts to school every day, and my concern was would that student see this as offensive to him?

Q. Did you have any other concerns?

A. Would Mr. Quick be the one taking the responsibility for offending that student?

Q. I'm sorry. Could you repeat your answer?

A. Would Mr. Quick be the one taking the responsibility for offending the student or would he look at it as Mr. Quick is making fun of him for wearing skirts to school every day?

Q. So are you saying your concern was that the student who wore skirts to school might see the image and think that Mr. Quick posted it?

A. Mr. Quick was making fun of him.

Q. Had Mr. Quick and the student who wore skirts

to school had previous interactions about the issue of him wearing skirts -- "him" being the student?

MR. SELLERS: Object to form. Go ahead and answer.

THE WITNESS: Not that I know of.

BY MR. FITZPATRICK:

Q. Are there any other concerns you had with respect to this image?

A. No.

Q. This concern about the male student who wore a skirt possibly being offended, did you voice that concern to anyone?

A. I do not recall.

Q. So sitting here today you don't recall raising that concern to Mr. Quick?

A. No, I do not recall.

Q. Do you recall voicing it to I.P.?

A. I do not recall.

Q. Do you recall putting this concern in your statement?

A. I did not.

Q. Why not?

A. I don't know.

Q. Did Mr. Quick say anything to you in that meeting about the image here in Exhibit 3?

A. I don't recall.

Q. Do you recall him saying anything to you about the exhibit we just -- the image we just discussed in Exhibit 4? Do you recall him saying anything to you about that one?

A. I do not recall.

Q. In the office meeting that we're talking about right now, was there any further discussion of the image here in Exhibit 3?

A. Not just this image. They were discussed as a group of five.

Q. But you don't recall any discussions specifically about this image?

A. No.

Q. Are you aware of any instances of the image in Exhibit 3 disrupting any classes?

A. No.

Q. Are you aware of any instances of the image in Exhibit 3 causing students to violate school rules?

A. No.

Q. Are you aware of any teacher's lesson plans that were disrupted by the image in Exhibit 3?

A. No.

Q. Did the image in exhibit -- in Exhibit 3

cause you to think that school might be disrupted in the future?

A. Yes.

Q. And why is that?

A. As the principal of the school, Mr. Quick had to have a type of persona, character to be respected by students, faculty, community, parents, and this could cause issue.

Q. Do you think an image like this could endanger people seeing Mr. Quick as sort of a symbol of respect?

A. Yes.

Q. Are you aware of any students complaining about the image in Exhibit 3?

A. No.

Q. Are you aware of any teachers complaining about the image in Exhibit 3?

A. No.

Q. Are you aware of any parents complaining about the image in Exhibit 3?

A. No.

Q. During the meeting that we've been talking about that you had with Mr. Quick, did he voice any suggestion to you that he believed the image in Exhibit 3 sexualized him?

from teachers about the image in Exhibit 3?

A. No.

Q. And are you aware of anyone receiving complaints from any students about the image in Exhibit 3?

A. Not just -- not just this one. Like I said, it was a group of five.

Q. And is it your understanding that a student complained about the image in Exhibit 3?

A. The complaint came about all five pictures.

Q. Okay. We'll talk about that. But you understood that -- that student to be concerned about Exhibit 3 along with others?

A. Yes.

Q. The student that voiced complaints, are you aware of any information suggesting that student missed any classes?

A. I'm not aware.

Q. Are you aware of any information suggesting that student suffered an impact to her grades because of the images?

A. No.

Q. You're not aware?

A. I'm not aware.

Q. All right. If you could go to Exhibit 5

A. No.

Q. Do you recall him mentioning anything about the litter box conspiracy theory?

MR. SELLERS: Object to form.

THE WITNESS: I don't understand that question. I don't.

BY MR. FITZPATRICK:

Q. Sometimes I wish I didn't either. During the meeting that you had with Mr. Quick when you were talking about Exhibit 3, do you recall him using the words "litter box" at all?

A. I do not recall.

Q. Sitting here today you have no recollection of him using those words in that meeting, correct?

A. No. Correct.

Q. My apologies. I think I asked this one. Did you receive any complaints from parents about this post --

A. No.

Q. -- in Exhibit 3?

A. No.

Q. Are you aware of anyone receiving complaints from parents about the image in Exhibit 3?

A. No.

Q. Are you aware of anyone receiving complaints

please.

A. (Complies.)

Q. Oh, I'm sorry. One more question. Strike that. We'll go to Exhibit 5. Mr. Crutchfield, have you seen this image before?

A. Yes.

Q. Did you see it at the same time as the last two images we've been talking about?

A. Yes.

Q. So in Mr. Quick's office after he called you there?

A. Yes.

Q. And was that the first time you saw it?

A. Yes.

Q. What was your reaction to seeing the image in Exhibit 5?

A. No real reaction to this one.

Q. If you can, tell me about your lack of reaction.

A. I really don't know what any of it is besides his head.

Q. Did you find the image in Exhibit 5 to be inappropriate?

A. No.

Q. The image that we just talked about in

Exhibit 3, did you find that image to be inappropriate?

A. Yes.

Q. And why is that?

A. Based on it could affect the other student, the other student that wore the skirts to school every day.

Q. So to make sure I understand, you believe the image was inappropriate because it could have offended another student?

A. Yes.

Q. Did you have any information suggesting the other student ever saw the image?

A. No.

Q. Did you ever ask the other student if he saw the image?

A. No.

Q. Did you ever mention that student to Mr. Quick in that meeting?

A. No.

Q. Did you ever mention that student to I.P.?

A. No.

Q. Are you aware of any information suggesting the image in Exhibit 5 disrupted Tullahoma High School?

A. No.

Q. Are you aware of any information suggesting the image in Exhibit 5 disrupted any classes?

A. No.

Q. Are you aware of any information suggesting the image in Exhibit 5 caused any students to violate school rules?

A. No.

Q. Did anything about the image in Exhibit 5 cause you to think that school might be disrupted in the future?

A. Again, it was represented to me as all five so I couldn't tell you what...

Q. But specifically about image five here, does anything about image five -- did anything about image five cause you to think that school might be disrupted in the future?

A. No.

Q. Did you receive any complaints from students about the image in Exhibit 5?

A. No.

Q. Are you aware of anyone receiving complaints from students about the image in Exhibit 5?

A. No.

Q. Are you aware of any teachers complaining

about the image in Exhibit 5?

A. No.

Q. Are you aware of teachers complaining to anyone about the image in Exhibit 5?

A. No.

Q. Did any parents complain to you about the image in Exhibit 5?

A. No.

Q. Are you aware of parents complaining to anyone about the image in Exhibit 5?

A. No.

MR. FITZPATRICK: So we're going to move on to discussing two other images. And, Alix, I put this on the record yesterday and so Andrew knows this.

But, Alix, as you know from our papers, we've objected under the Supreme Court's decision in Bremerton about the relevance of the, for lack of a better word, the KKK and the HIPAA memes to this action. So I'm going to ask some questions about those just to ensure kind of the completeness of our record, but we're preserving our position regarding the lack of a relevance of those images to this action.

MR. SELLERS: I'm like Carl I'm going to

object to your objection but go ahead.

MR. FITZPATRICK: Fair enough. And I won't object to your objection to my objection, though I'm wondering if I should to preserve it.

MR. SELLERS: Well, you know, as we've discussed it's not evidence so -- at this juncture.

MR. FITZPATRICK: I understand. I just want to make sure that there's no argument that I'm neither waiving or forfeiting an argument --

MR. SELLERS: Understood.

MR. FITZPATRICK: -- of the relevance of these images to this lawsuit, if I ask some questions about them.

BY MR. FITZPATRICK:

Q. All right. Mr. Crutchfield, if you could turn to Exhibit 1, please.

A. Okay.

Q. Have you seen this before?

A. Yes.

Q. When was the first time that you saw it?

A. August 10th.

Q. Did you see it in the same meeting as the other three?

A. Yes.

Q. What was your reaction to seeing it?

from my understanding they were all five on his Instagram post.

Q. That's something that was presented to you as a -- as a fact?

A. Yes. That's the way it was presented to me.

Q. But you have no firsthand knowledge of whether they were actually there?

A. No.

Q. Was that -- would that be something that Mr. Quick told you?

A. Yes.

Q. Did you have any sources other than Mr. Quick who you think told you that all five were on his Instagram?

A. No.

Q. Did Mr. Quick tell you that he had seen all five on his Instagram?

A. I do not recall if he used that language or not.

Q. What language do you recall him using?

A. I recall him saying that -- that these five images were posted on his Instagram account.

Q. So you took that as a given?

A. Yes.

Q. Other than what Mr. Quick told you, are you

A. I don't have that information.

Q. Are you aware of any information suggesting Mr. Quick investigated whether any other students had seen the Hitler or the Klan memes?

A. No.

Q. Are you aware of any information suggesting that Dr. Flowers investigated whether any other students had seen the Hitler or the Klan memes?

A. I'm not aware.

Q. So you have no information on that, correct?

A. Yes. Yes.

Q. I would like to direct your attention to Exhibit 31, please.

A. (Complies.)

Q. Do you have that in front of you?

A. Yes.

Q. Is this the student handbook that was in effect during the 2022 through 2023 school year?

A. Yes.

Q. And this would have been in effect on August 10th, 2022; correct?

A. Yes.

Q. I'd like to turn your attention to Page 9, please.

A. Okay.

aware of any information that would suggest that the images -- that all five images were, in fact, on I.P.'s Instagram?

A. No.

Q. Yesterday we heard some testimony about an alleged airdrop of images of the Klan and the Hitler memes. Are you aware of any students other than A.L. reporting having received the Hitler or the Klan memes?

A. No.

Q. Other than A.L. are you aware of any students having reported even seeing the Hitler or the Klan memes?

A. I do not recall.

Q. But is it fair to say that sitting here today you do not have an affirmative recollection of having any information to suggest that -- strike that. I'll ask it better.

Is it fair to say that sitting here today you do not recall any information that would suggest that students other than A.L. had seen the two images?

A. No.

Q. That's not fair to say or you don't have any information?

Q. And the third bullet point under Videos/Photos, do you see that?

A. Yes.

Q. Is this the policy that I.P. was punished under?

A. Yes.

Q. When you spoke with Mr. Quick about the images, did he bring up this policy?

A. He brought this policy up to I.P.

Q. And how did he do that?

A. If I remember, he had I.P. read it.

Q. Did he have I.P. read it out loud or to himself?

A. To himself.

Q. Not out loud?

A. Not that I recall.

Q. Did I.P. do as he was requested?

A. Yes.

Q. So this third bullet point on Page 9 of the student handbook, if I call this the social media policy, will you understand that that's what I'm referring to?

A. Yes.

Q. Had this policy been in effect during your time at Tullahoma High School prior to August 10th,

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2022?

A. Yes.

Q. Prior to August 10th, 2022, had any students to your knowledge been disciplined for violating the policy?

A. I do not remember.

Q. Sitting here today do you have any recollection of imposing any punishments or students for violating the social media policy other than I.P.? Sorry. Strike that. I will ask a much better question.

Prior to August 10th, 2022, do you have any recollection of imposing discipline on students for violating the social media policy?

A. I do not recall.

Q. But fair to say that sitting here today you do not have any recollection of imposing such punishment. Fair?

A. Fair.

Q. Would it also be fair to say that given your bailiwick as Assistant Principal, that you would have been the most likely source of discipline for violating this policy?

A. Yes.

Q. Prior to August 10th, 2022, are you aware of

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any others at Tullahoma High School disciplining students for violating the social media policy?

A. I'm not aware.

Q. In fact, sitting here today is I.P.'s suspension the first punishment that you can recall at Tullahoma High School under the social media policy?

A. Yes, because it's sitting in front of me right now.

Q. But, again, you can't remember any prior to it, correct, sitting here today?

A. Not that I can recall.

Q. So let's go back to the front office on August 10th, 2022. If I recall your testimony correctly, Mr. Quick called you into the room, showed you the five images. You said that took about a couple of minutes and then I.P. arrived. Is that right?

A. Yes.

Q. Did I.P. arrive with anyone?

A. The Band Director.

Q. Is that Justin Scott?

A. Yes.

Q. Why don't you just walk me through what happened? I.P. comes in, then what happens?

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A. He sat down in front of Mr. Quick's desk. Mr. Quick told him he had some pictures that he was accused of making and posting. He said he didn't do them all.

Mr. Quick explained to him why it was concerning to him, showed him the policy for it. Then when he excused himself, he walked by me, Suspend him for five days, and that was the end of that meeting.

Oh, Mr. Scott had a band contract that had been signed by I.P. And he showed that to him, and that he had violated that band policy. That was part of it. I believe that was pretty much the meeting. As far as word for word, I couldn't...

Q. What do you recall of Mr. Quick's demeanor during the meeting? Did he seem upset?

A. A little.

Q. Tell me more.

A. He wasn't yelling. He didn't yell. He talked calmly. He was a little upset. He was a little hurt but nothing -- nothing that would have been considered out of bounds -- he didn't yell at the student. He didn't talk down to the student. It was just a conversation of he was being strict. This is what -- you know, nothing outrageous.

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Q. Was -- was his focus on how he felt the pictures impacted his reputation?

A. His reputation as in running the school, yes.

Q. That was his main focus?

A. Yes.

MR. SELLERS: Object to form.

BY MR. FITZPATRICK:

Q. Prior to August 10th, 2022, to your knowledge had Tullahoma High School had any prior incidents of teachers being sort of made fun of on social media?

A. No, not that I know of.

Q. Do you recall anything that I.P. said during the meeting with you, Mr. Quick, and Mr. Scott?

A. Like I said the only thing I remember him saying is that he -- some of them, not all of them.

Q. "That he"?

A. He said that he created some of them, not all of them.

Q. What was I.P.'s demeanor during that part of the meeting?

A. It was calm. It wasn't -- nothing -- nothing stood out.

Q. So at some point Mr. Quick no longer becomes a part of that meeting, correct?

A. Yes.

Mr. Scott went to the back of the building to see if she was there. While he was gone, I turned to my computer and starting putting in the discipline into Skyward. I.P. starting getting a little upset, like crying. I handed him some tissues.

I asked was he okay. He just kept crying and he started breathing a little – a little hard. I told him, I said, Breathe through your – breathe in your nose and out your mouth, in your nose, out your mouth, slowly, control it.

Mr. Scott came back. Mr. Scott kneeled down next to him and was trying to help him. I asked him did he need – did he need a nurse. I tried to find the nurse. The nurse had already left for the day.

I told him I was going to go out front to see if his mom was out front of the building. When I walked out of my office, she was coming into the office door. She come around the counter. Came back to my office.

She kneeled down to -- to I.P. and said, It was about the pictures. And then she asked me and Mr. Scott to step out of the office so she could calm him down.

We stepped out of the office. We came --

came back in. She let us back in. We came back in. I.P. was still upset. She was still trying to calm him. She tried to call some doctors to get him into the doctor.

At some time Mr. Scott said, Do we need to call 911? She said, No, don't call 911. They'll only make -- make him worse. She called about at least four or five doctors, and we could hear them on the phone.

And they was all saying, Take him to the emergency room. If he's that bad, take him to the emergency room. We can't see him right now. Take him to the emergency room, and they'll do a workup on him. And she denied taking him.

At some point in there I told her that he was going to be suspended. He calmed down. I went and got a wheelchair, helped him to the car. He got in the wheelchair.

I pushed him outside to the car. His mom helped him into the car. I repeated to her again, He's going to be suspended for five days. I told her to call me the next day, and we'll talk about what's going on.

As we was leaving the office, she said something like you're going to have to wait to go

somewhere because I got to go home and get my Walmart order, and then got up to the car, got him in the car, and told her to call me the next day and we'll talk more about it. But he's going to be suspended for five days and they left.

I came back in. And the more I thought about it, I went and told Mr. Quick, I said, five days is too long. He needs three days. He said, I'm fine with that. So I went in and I did it for three days instead of five, and then that was the meeting.

Q. All that occurred on August 10th?

A. Yes.

Q. When you had I.P. read the policy, did you have him read it to himself or out loud?

A. To himself.

Q. Did he?

A. As far as I know he did.

Q. If we could go back to Exhibit 34, your statement?

A. Okay.

Q. Do you have it in front of you?

A. Yes.

Q. I'd like to direct your attention to the start of the third or first full paragraph where it starts, "I explained". Do you see that?

A. Yes.

Q. Can you read that sentence for me out loud?

A. "I explained to him that he disseminated unauthorized and misrepresented pictures that were embarrassing and discrediting to the reputation of Mr. Quick." Do you want me to read the whole paragraph or just that sentence?

Q. Just that sentence.

A. Okay.

Q. Do you recall what specifically you told I.P. with respect to that?

A. I don't understand the question.

Q. So I guess what I'm asking you is: This first sentence, is that what you said to him verbatim? I'm wondering if you remember the specifics of what you told I.P. on the subject of the pictures being embarrassing and discrediting to the reputation of Mr. Quick? Do you remember specifically what you said?

A. Not specifically word for word.

Q. Do you remember the ballpark of what you said?

A. That would be it.

Q. At some point after you told I.P. about the suspension, it sounds like you left the room;

any training on how to handle students with posttraumatic stress disorder?

A. No.

Q. On August 10th, 2022, were you aware that I.P. had a 504 Plan?

A. Yes.

Q. And how were you aware of that?

A. We're all made aware when they have a 504. It's on their Skyward account.

Q. You said, "We're all made aware." Who does "all" mean?

A. All -- all administrators and all of his teachers.

Q. And what were you aware of regarding I.P.'s 504 Plan?

A. That he had classroom anxiety.

Q. Do you recall who suggested calling 911?

A. Mr. Scott.

Q. Did you agree with him?

A. Yes, I did.

Q. About how long was it between when I.P. went into your office and B.P. arrived?

A. Maybe 15 minutes.

Q. So looking back at Exhibit 34 at your statement, the fifth paragraph where it starts with,

"After about two hours the mother agreed to take him to the ER."

A. Uh-huh.

Q. What does that two hours start from? After two hours from what? And you're welcome to take the time you need to get situated with your statement.

A. After the time that she got there.

Q. So this means two hours after B.P. arrived?

A. Yes.

Q. So from the time you told I.P. about his suspension and he started breathing heavily to when he departed, more than two hours had elapsed, is that right, if I'm doing the math right?

A. Yes.

Q. I see in the next sentence in your statement you wrote, "I wheeled him out to the car in a wheelchair, and the mother helped him into the car." Was it an actual wheelchair?

A. Yes.

Q. Where did you find a wheelchair?

A. At the nurse's office.

Q. Prior to August 10th, 2022, had you met I.P.?

A. Yes.

Q. What was the occasion for you meeting him?

A. He was put in ISS for harassing a kid --

bullying a kid online.

Q. Had you had any other interactions with him?

A. No.

Q. How did I.P. get into the wheelchair?

A. His mother helped him into the wheelchair.

Q. What was his condition when he was being helped into a wheelchair?

A. His hands were still a little bit -- a little bit clawed. He started to relax a little bit, and she helped him into the wheelchair.

Q. When I.P. was in your office after he started breathing heavily --

A. Uh-huh.

Q. -- do you recall Mr. Quick ever coming by?

A. No, I did not.

Q. Do you recall Mr. Quick ever coming by and asking how I.P. was doing?

A. I don't recall that.

Q. Were you worried for I.P.?

A. I was worried about him catching his breath.

Q. Anything more than that?

A. At what point in time are you talking it?

Q. After he started breathing heavily, so --

A. From that time?

Q. Yeah. From that time were you worried about

him?

A. Yes.

Q. Why is that?

A. Because of the condition he was in.

Q. Now, if I recall your earlier testimony correctly, you said that after I.P. departed, you had another brief discussion with Mr. Quick; is that right?

A. Yes.

Q. And was that on your way back from helping I.P. into B.P.'s car?

A. Yes.

Q. And so did you stop by Mr. Quick's office?

A. I can't recall where that conversation happened.

Q. Was it in the front office somewhere?

A. I don't recall.

Q. Did you initiate the conversation?

A. Yes.

Q. And what did you tell him?

A. I thought five days was too much. Three days -- it was more of a three-day suspension.

Q. Why did you think five days was too much?

A. Five days is usually reserved for violent offenses, fighting, that type of thing.

# EXHIBIT H

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
 2 EASTERN DISTRICT OF TENNESSEE  
 3 AT WINCHESTER DIVISION

---

4 I.P. a minor, by and through B.P.,  
 5 Plaintiff,  
 6 vs. NO. 4:23-cv-00026  
 7 TULLAHOMA CITY SCHOOLS, a  
 8 political subdivision of the  
 9 State of Tennessee; JASON QUICK,  
 10 in his individual capacity; and  
 11 DERRICK CRUTCHFIELD, in his  
 12 individual capacity,  
 13  
 14 Defendants.

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15  
 16 Deposition of:  
 17 RENE E FLOWERS

18 Taken on behalf of the Plaintiff  
 19 January 17, 2025  
 20 Commencing at 12:39 pm. (CST)

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 23  
 24  
 25 REPORTED BY: Tonya D. Stolze, LCR

Page 2

1  
 2 A P P E A R A N C E S  
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 2 I N D E X  
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 5 Examination 5  
 6 by MR. Fitzpatrick  
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 16 Exhibit No. 37 60  
 17 Statement - TCS/000180  
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Page 4

1  
 2 S T I P U L A T I O N S  
 3  
 4  
 5 The deposition of RENE E FLOWERS, was taken  
 6 by Notice, at 510 South Jackson Street, Tullahoma,  
 7 Tennessee, on January 17, 2025, for all purposes  
 8 under the Federal Rules of Civil Procedure.  
 9 All formalities as to caption, notice,  
 10 statement of appearance, et cetera, are waived. All  
 11 objections, except as to the form of the question,  
 12 are reserved to the hearing, and that said  
 13 deposition may be read and used in evidence in said  
 14 cause of action in any trial thereon or any  
 15 proceeding herein.  
 16 It is agreed that TONYA D. STOLZE, LCR,  
 17 Notary Public and Court Reporter for the State of  
 18 Tennessee, may swear the witness, and that the  
 19 reading and signing of the completed deposition by  
 20 the witness was discussed.  
 21  
 22  
 23  
 24  
 25

Page 5

1 \* \* \*

2 RENEE FLOWERS,

3 was called as a witness, and after having been duly

4 sworn, testified as follows:

5

6 EXAMINATION

7 QUESTIONS BY MR. FITZPATRICK:

8 Q. Good afternoon, Ms. Flowers.

9 A. Hello.

10 Q. Do you understand that you're here today to

11 provide testimony in connection with an ongoing

12 lawsuit?

13 A. Yes.

14 Q. Excellent. So one thing I'll just note

15 upfront is that I know a lot of the questions that

16 we're going to be talking about today involve people

17 who either are minors or were minors when the events

18 happened.

19 So to protect their privacy in the

20 transcript, they're going to show up only as their

21 initials. But when I ask questions and you provide

22 answers, you are free to use their full name.

23 A. Uh-huh.

24 Q. And you should know that when their full name

25 is transcribed, it's just going down as the initials

Page 6

1 to protect their privacy. Does that make sense?

2 A. Yes. Thank you for that.

3 MR. FITZPATRICK: And, Andrew, does that

4 accurately reflect the agreement that we've had

5 ongoing?

6 MR. SELLERS: It does.

7 MR. FITZPATRICK: Excellent.

8 BY MR. FITZPATRICK:

9 Q. Ms. Flowers, do you understand that your

10 testimony today is being given under oath just as if

11 you were giving testimony in a courtroom in front of

12 a judge and a jury?

13 A. Yes.

14 Q. Have you ever given a deposition before?

15 A. No.

16 Q. Have you ever testified under oath before?

17 A. No.

18 Q. Well, I'm honored to be your first. So I'll

19 go over some ground rules today just to make sure

20 that things keep flowing smoothly.

21 So the first is that our court reporter here

22 to my right is taking a verbatim transcript of

23 everything that we say. So you need to be sure to

24 verbalize your answers. No shakes of the head or

25 uh-huhs. Make sense?

Page 7

1 A. It makes sense.

2 Q. If your answer is yes or a no, make sure to

3 say yes or no out loud. Make sense?

4 A. It makes sense.

5 Q. The next rule is that we can't speak at the

6 same time. It's very hard for our court reporter to

7 pick that up. So I will do my best to make sure

8 your answer is done before I ask another question,

9 and all I ask is that you make sure I'm done asking

10 my question before you start your answer. Fair?

11 A. Fair.

12 Q. And if you don't understand any of my

13 questions, that's fine. Just let me know, and I'm

14 happy to rephrase. But if you answer my question, I

15 will assume you understood it. Fair?

16 A. That is fair.

17 Q. If you need to take a break at any point,

18 that's completely fine. All I ask is that if I have

19 a question pending to you, that you answer that

20 pending question, and then we can take a break.

21 Make sense?

22 A. Yes.

23 Q. From time to time today Mr. Sellers might

24 object to one of my questions. That's perfectly

25 fine and a normal part of the process. I don't take

Page 8

1 it personally. If he objects, you still answer my

2 question after he's done objecting unless he

3 instructs you not to answer the question. Does that

4 make sense?

5 A. Yes.

6 Q. Ms. Flowers, have you consumed any alcohol in

7 the last 24 hours?

8 A. No.

9 Q. Have you taken anything that could impair

10 your memory?

11 A. No.

12 Q. Do you have any condition that affects your

13 memory?

14 A. No.

15 Q. What is your full name?

16 A. Renee Christine Flowers.

17 Q. Have you communicated with anyone except

18 counsel about this deposition?

19 A. No.

20 Q. Did you review any documents in preparation

21 for this deposition?

22 A. Yes.

23 Q. What did you review?

24 A. Communication -- my -- I had a Google Doc

25 that I had written down what happened that day, and

1 Q. All right. I'd like to direct your attention  
 2 to Exhibit 4, please.  
 3 MR. SELLERS: They're right next to you.  
 4 The stack --  
 5 MR. FITZPATRICK: Yes, the big stack of  
 6 exhibits next to you.  
 7 MR. SELLERS: It will be down at the  
 8 bottom. I think they're numbered highest to lowest.  
 9 **THE WITNESS: Oh, highest to lowest.**  
 10 **All right. Okay.**  
 11 BY MR. FITZPATRICK:  
 12 Q. Have you seen this image before?  
 13 **A. Yes.**  
 14 Q. When was the first time that you saw it?  
 15 **A. On the day of the incident.**  
 16 Q. And is that August 10th, 2022?  
 17 **A. Yes. That's what I recall.**  
 18 Q. And when in the day did you see it?  
 19 **A. I don't know exactly.**  
 20 Q. Was it the beginning of the day, middle, end?  
 21 **A. Middle or end.**  
 22 Q. And what was the occasion for you seeing it?  
 23 **A. So I'm trying to remember this exact image --**  
 24 **when exactly I would have seen this. I believe it's**  
 25 **when I pulled up -- I saw an image on R.Y.'s**

1 **A. Yes.**  
 2 Q. So there -- before you saw this image, there  
 3 were two other images you had already seen?  
 4 **A. Yes.**  
 5 Q. Understood. Can you describe your reaction  
 6 to the image here in Exhibit 4?  
 7 **A. My reaction?**  
 8 Q. Yes.  
 9 **A. I don't know how to -- I mean...**  
 10 Q. Did you find it silly, offensive? Pick your  
 11 adjective.  
 12 **A. Okay. Goofy and a little -- I don't know --**  
 13 **not favorable.**  
 14 Q. What do you mean by "not favorable"?  
 15 **A. Well, they have somebody's image in there**  
 16 **doing something with it, and I don't think Mr. Quick**  
 17 **posted this so I don't think it's favorable.**  
 18 Q. Are you aware of any information suggesting  
 19 that the image here in Exhibit 4 disrupted the  
 20 operation of Tullahoma High School?  
 21 **A. Can you repeat that?**  
 22 Q. Sure. Are you aware of any information  
 23 suggesting that the image here in Exhibit 4  
 24 disrupted the operation of Tullahoma High School?  
 25 **A. Not that I recall.**

1 **Instagram and then pulled up an Instagram account on**  
 2 **mine and saw the image, if this is the image. There**  
 3 **were several images.**  
 4 Q. So you originally had R.Y.'s Instagram open?  
 5 **A. She had it open.**  
 6 Q. She had it open?  
 7 **A. Uh-huh.**  
 8 Q. And then did you see this picture on her  
 9 account?  
 10 **A. No.**  
 11 Q. So just if you could -- and pardon me if I'm  
 12 just misunderstanding. If you could walk me through  
 13 kind of how you first stumbled across this image?  
 14 **A. Okay. Can you explain what you need me to**  
 15 **answer?**  
 16 Q. Sure. I'm just wondering when is the first  
 17 time you recall seeing this image, and how was it  
 18 brought to your attention?  
 19 **A. So I saw this image that day. We went --**  
 20 **Mr. Quick and I went to ask R.Y. if she had any**  
 21 **information about Instagram images; and she showed**  
 22 **us some images on her phone, and then I pulled them**  
 23 **up on my Instagram.**  
 24 Q. Now, at the point that you spoke with R.Y.,  
 25 were you and Mr. Quick investigating other images?

1 Q. Are you aware of any information suggesting  
 2 that the image in Exhibit 4 disrupted any classes?  
 3 **A. Not that I recall.**  
 4 Q. Are you aware of any information suggesting  
 5 that the image in Exhibit 4 caused any students to  
 6 violate school rules?  
 7 **A. Not that I recall.**  
 8 Q. Did the image in Exhibit 4 cause you to think  
 9 that school might be disrupted in the future?  
 10 **A. Not that I recall.**  
 11 Q. Did you receive any complaints from students  
 12 about the image in Exhibit Number 4?  
 13 **A. Not that I recall.**  
 14 Q. Are you aware of any students complaining  
 15 about the image in Exhibit 4?  
 16 **A. Not that I recall.**  
 17 Q. Did any teachers complain to you about the  
 18 Exhibit -- about the image in Exhibit 4?  
 19 **A. Not that I recall.**  
 20 Q. And are you aware of any teachers complaining  
 21 about the image in Exhibit Number 4?  
 22 **A. Not that I recall.**  
 23 Q. Did any parents complain to you about the --  
 24 the image in Exhibit 4?  
 25 **A. Not that I recall.**

Page 29

1 Q. And are you aware of any parent complaints  
 2 about the image in Exhibit 4?  
 3 **A. Not that I recall.**  
 4 Q. And just to make sure that I understand your  
 5 answers, when you say "not that I recall", by that  
 6 you mean sitting here today you don't recall.  
 7 You're not aware of any instances; is that fair?  
 8 **A. Yes.**  
 9 Q. If you could turn to Exhibit 3, please.  
 10 **A. (Complies.)**  
 11 Q. Do you have it?  
 12 **A. Yes.**  
 13 Q. Excellent. Dr. Flowers, have you seen this  
 14 image before?  
 15 **A. Yes.**  
 16 Q. And when was the first time you saw it?  
 17 **A. I believe on the day of the incident.**  
 18 Q. Did you learn about this image at the same  
 19 time that you learned about the one we were just  
 20 speaking about?  
 21 **A. I believe so.**  
 22 Q. What was your reaction to it?  
 23 **A. Not favorable.**  
 24 Q. And why is that?  
 25 **A. Taking the image of the principal and using**

Page 30

1 **it in an unfavorable way.**  
 2 Q. Do you recall if Mr. Quick said anything to  
 3 you about this image?  
 4 **A. I don't recall.**  
 5 Q. Do you recall if he said anything to you  
 6 about the -- the previous image we were just  
 7 discussing?  
 8 **A. I don't recall.**  
 9 Q. Are you aware of anything -- any information  
 10 suggesting the image here in Exhibit 3 disrupted the  
 11 operation of Tullahoma High School?  
 12 **A. I don't recall.**  
 13 Q. So just to make sure I'm clear, you're not  
 14 aware of any information suggesting that the image  
 15 in Exhibit 3 disrupted Tullahoma High School;  
 16 correct?  
 17 **A. Correct.**  
 18 Q. Are you aware of any information suggesting  
 19 that the image in Exhibit 3 disrupted any classes?  
 20 **A. No.**  
 21 Q. Are you aware of any information suggesting  
 22 that the image in Exhibit 3 caused any students to  
 23 violate school rules?  
 24 **A. No.**  
 25 Q. Did the image in Exhibit 3 cause you to

Page 31

1 believe that Tullahoma High School might be  
 2 disrupted in the future?  
 3 **A. Can you repeat that?**  
 4 Q. Sure. When you -- on August 10th, 2022, did  
 5 the image in Exhibit 3 cause you to think that  
 6 Tullahoma High School might be disrupted in the  
 7 future?  
 8 **A. Not this singular picture, no.**  
 9 Q. Did any students complain to you about the  
 10 image in Exhibit 3?  
 11 **A. Not that I recall.**  
 12 Q. Do you recall any reports of student  
 13 complaint regarding Exhibit 3?  
 14 **A. Not that I recall.**  
 15 Q. Did any teachers complain to you about the  
 16 image in Exhibit 3?  
 17 **A. Not that I recall.**  
 18 Q. Are you aware of any teacher complaints  
 19 regarding the image in Exhibit 3?  
 20 **A. Not that I recall.**  
 21 Q. Did any parents complain to you about the  
 22 image in Exhibit 3?  
 23 **A. Not that I recall.**  
 24 Q. Are you aware of any parent complaints about  
 25 the image in Exhibit 3?

Page 32

1 **A. Not that I recall.**  
 2 Q. If I could direct your attention to Exhibit  
 3 5, please.  
 4 **A. (Complies.)**  
 5 Q. Have you seen this image before?  
 6 **A. Yes.**  
 7 Q. When did you see it for the first time?  
 8 **A. The day of the incident.**  
 9 Q. Did you see it for the first time at the same  
 10 time as the previous two images we were just  
 11 discussing?  
 12 **A. Yes.**  
 13 Q. And that's the one with Mr. Quick in the  
 14 dress and the image of Mr. Quick holding a box of  
 15 vegetables?  
 16 **A. I believe so.**  
 17 Q. What was your reaction upon seeing the image  
 18 in Exhibit 5?  
 19 **A. Not favorable.**  
 20 Q. Why was it not favorable?  
 21 **A. I don't know. I don't know what's going on**  
 22 **with his head.**  
 23 Q. Did you have any other concerns?  
 24 **A. Just that the principal's face is on some**  
 25 **kind of meme, and I'm not quite sure what is going**

Page 33

1 on with that.

2 Q. Do you recall if Mr. Quick said anything to

3 you about this meme?

4 **A. I don't recall.**

5 Q. But sitting here today you're not aware of

6 anything? You can't recall anything?

7 **A. No.**

8 Q. Are you aware of any information suggesting

9 that the image in Exhibit 5 disrupted the operation

10 of Tullahoma High School?

11 **A. Not that I recall.**

12 Q. Are you aware of any information suggesting

13 that the image in Exhibit 5 disrupted any classes?

14 **A. Not that I recall.**

15 Q. Are you aware of any information suggesting

16 that the image in Exhibit 5 caused any students to

17 violate school rules?

18 **A. Not that I recall.**

19 Q. On August 10th, 2022, did the image in

20 Exhibit 5 cause you to think that school might be

21 disrupted in the future?

22 **A. It could cause a disruption. I don't know.**

23 **I don't...**

24 Q. Is that something you thought on August 10th,

25 2022?

Page 34

1 **A. I don't recall.**

2 Q. Why did you -- why do you think it might

3 cause a disruption?

4 **A. I don't know what it is, and it's got the**

5 **principal's face on it. And he didn't post it.**

6 Q. Anything else?

7 **A. No.**

8 Q. Did any students complain to you about this

9 post?

10 **A. Not that I recall.**

11 Q. Are you aware of students complaining to

12 anyone about this post?

13 **A. Not that I recall.**

14 Q. Did any teachers complain to you about the

15 image in Exhibit 5?

16 **A. Not that I recall.**

17 Q. Are you aware of teachers complaining to

18 anyone about the image in Exhibit 5?

19 **A. Not that I recall.**

20 Q. Did any parents complain to you about the

21 post in Exhibit 5?

22 **A. Not that I recall.**

23 Q. And are you aware of any parent complaints

24 about the post in Exhibit 5?

25 **A. Not that I recall.**

Page 35

1 Q. Okay. So now we're going to talk about two

2 other images.

3 MR. FITZPATRICK: And, Andrew, to save

4 some time, is it -- can we agree that my running

5 objection that I placed on the record in

6 Mr. Crutchfield and Mr. Quick's deposition --

7 MR. SELLERS: Sure.

8 MR. FITZPATRICK: -- can carry over?

9 MR. SELLERS: Sure.

10 MR. FITZPATRICK: Thank you. I

11 appreciate it.

12 BY MR. FITZPATRICK:

13 Q. All right. Dr. Flowers, will you turn to

14 Exhibit 1, please?

15 **A. (Complies.)**

16 Q. Have you seen this image before?

17 **A. I believe so.**

18 Q. And when did you first see this image?

19 **A. The day of the incident.**

20 Q. Now, if I recall our earlier discussion,

21 would this have been one of the images you learned

22 of before the three we just talked about?

23 **A. Yes.**

24 Q. And how did this image come to your

25 attention?

Page 36

1 **A. A student showed the image to Mr. Quick, and**

2 **Mr. Quick showed it to me.**

3 Q. How did Mr. Quick bring it to your attention?

4 **A. He had me come to the office and look at it.**

5 Q. Were you nearby at the time?

6 **A. I think I was in my office. I don't recall.**

7 Q. Is your office near his?

8 **A. No.**

9 Q. Do you recall how he contacted you?

10 **A. I don't recall.**

11 Q. Do you recall if he e-mailed you?

12 **A. I don't believe he did.**

13 Q. Did he call you?

14 **A. They -- we typically throughout the day, we**

15 **have a walkie-talkie so we'll call on the radio or**

16 **we'll call down into our office. So I don't know on**

17 **that specific day what -- how he contacted me but...**

18 Q. Do you know at the time what Mr. Crutchfield

19 was doing?

20 **A. I don't.**

21 Q. So when Mr. Quick asked you -- did he ask you

22 to come to his office?

23 **A. Yes.**

24 Q. Did he say why?

25 **A. No. I don't recall him saying why.**

Page 57

1 Q. -- you don't remember that?

2 **A. Yes. It's fair that I don't remember that.**

3 **Yes.**

4 Q. What happened after that?

5 **A. I took a picture of her phone that had the**

6 **image or the -- or his account on it. I can't**

7 **remember which, and then we went back to the office.**

8 Q. You took a picture of her phone?

9 **A. I took a picture of the image.**

10 Q. Did you take a screenshot?

11 **A. No.**

12 Q. I'm struggling a little bit here, so I'll

13 break it down. What did you take a picture with?

14 **A. My phone.**

15 Q. And did you take a -- what did you take a

16 picture of with your phone?

17 **A. Actually, no, I didn't do that because I had**

18 **my own phone. And I didn't do that actually. That**

19 **doesn't make sense.**

20 Q. What did you do?

21 **A. Okay. Thank you. I pulled up -- I looked**

22 **for that Instagram account on my phone.**

23 Q. And did you bring it up?

24 **A. Yes.**

25 Q. And when you did that did you see the images

Page 58

1 in Exhibit 3, 4, and 5?

2 **A. Yes.**

3 Q. I take it you did not see the images in

4 Exhibit 1 and 2; correct?

5 **A. Not that I recall.**

6 Q. Did you take a screenshot when you brought it

7 up?

8 **A. I don't remember if I did or not. I know I**

9 **pulled it up to look at it.**

10 Q. Have you searched for whether you made a

11 screenshot?

12 **A. I have not -- not that I remember.**

13 Q. Okay. So did you bring up I.P.'s Instagram

14 page on your phone while R.Y. was still there?

15 **A. Yes.**

16 Q. How did things end with R.Y.

17 **A. She went back to practice, and that was --**

18 **that's what I recall. She went back into the gym to**

19 **practice.**

20 Q. Did you ask R.Y. any questions -- did you or

21 Mr. Quick ask R.Y. any questions about why she

22 believed I.P. made the two images in Exhibits 1 and

23 2?

24 **A. I don't recall.**

25 Q. What happened next?

Page 59

1 **A. I believe we spoke with Mr. Scott.**

2 Q. You and Mr. Quick --

3 **A. I believe so.**

4 Q. -- spoke with Mr. Scott?

5 **A. I think so -- I'm trying to remember exactly**

6 **but I think so.**

7 Q. And did you do that after you met with R.Y.?

8 **A. I believe so.**

9 Q. What did y'all talk about with Mr. Scott?

10 **A. I think it was just where is -- where is**

11 **I.P.? Where is he at? Is he in band or is he in**

12 **there with them? They were in the gym -- the band**

13 **was in the gym.**

14 Q. Was he in band?

15 **A. Yes.**

16 Q. Okay. Do you recall anything else being

17 discussed with Mr. Scott?

18 **A. I don't recall.**

19 Q. What happened after that?

20 **A. We went back to the office, and that's -- we**

21 **went back towards the main office.**

22 Q. Who do you mean by "we"?

23 **A. Mr. Quick and I.**

24 Q. Once you got back to the office, did you go

25 your separate ways?

Page 60

1 **A. I believe so, yes.**

2 Q. After you went your separate ways, did you

3 have any further discussions with Mr. Quick about

4 this matter?

5 **A. Not that I recall.**

6 Q. At some point you drafted a statement,

7 correct?

8 **A. Can you repeat that?**

9 Q. At some point you put together a statement,

10 correct?

11 **A. Yes.**

12 MR. FITZPATRICK: I'll hand you a

13 document I'd like marked as Exhibit Number 37,

14 please.

15 (WHEREUPON, a document was marked as

16 Exhibit Number 37.)

17 BY MR. FITZPATRICK:

18 Q. Is this the statement you're referring to?

19 **A. You said that I drafted a statement.**

20 Q. Is this the -- is this the statement you

21 drafted?

22 **A. Yes.**

23 Q. Do you recall when you drafted it?

24 **A. It was around the same time as this incident.**

25 Q. Why did you draft a statement?

# EXHIBIT I

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT WINCHESTER

I.P., a minor, by and through B.P.,

*Plaintiff,*

v.

TULLAHOMA CITY SCHOOLS, a  
political subdivision of the State of  
Tennessee,

*Defendant.*

Case Number: 4:23-cv-26

**DECLARATION OF A.L. IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

---

Under 28 U.S.C. § 1746, I, A.L., declare as follows:

1. I am over the age of 18 and competent to testify.
2. I have personal knowledge of the facts set forth in this Declaration.
3. I was a Tullahoma High School student in August 2022.
4. On August 10, 2022, I participated in a free period during school called PAWS in the school gymnasium.
5. PAWS was not a class, but a period where students could choose to participate in activities like knitting, playing video games, or watching TV.
6. During PAWS that day, using an iPhone feature called AirDrop, someone anonymously sent two images to me and other students in the gymnasium.
7. One of the two images was of then-principal Jason Quick, edited onto a photograph of Adolf Hitler.
8. The other image was of then-principal Jason Quick, edited onto a photograph of members of the Ku Klux Klan.
9. The AirDrop notification did not indicate who sent the two images.

10. I did not and do not know who created the two images.
11. I did not and do not know who sent the two images.
12. I did not and do not know how many students received the two images.
13. That same day, I went to the principal's office to speak to Mr. Quick.
14. I told Mr. Quick that students had received the two AirDropped images.
15. I showed Mr. Quick the two images and then emailed them to him.
16. I told Mr. Quick that I overheard another student, R.Y., talk about images of Mr. Quick that day and say the name "L—."
17. I told Mr. Quick that I overheard R.Y. say that L— had posted images of Mr. Quick on Instagram.
18. I did not hear R.Y. say that L— created the two Airdropped images.
19. I did not tell Mr. Quick that I heard R.Y. say that L— created the two Airdropped images.
20. After my meeting with Mr. Quick on August 10, 2022, I had no further interactions with him or any other Tullahoma High School administrators about the two AirDropped images, or any other images of Mr. Quick.
21. Seeing the two images did not interrupt my school day.
22. Seeing the two images did not disrupt my ability to learn or participate in school.
23. I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 23, 2025

    
A.L. \_\_\_\_\_

# EXHIBIT J

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
 2 EASTERN DISTRICT OF TENNESSEE  
 3 AT WINCHESTER DIVISION

---

4 I.P. a minor, by and through B.P.,  
 5 Plaintiff,  
 6 vs. No. 4:23-cv-00026  
 7 TULLAHOMA CITY SCHOOLS, a  
 8 political subdivision of the  
 9 State of Tennessee; JASON QUICK,  
 10 in his individual capacity; and  
 11 DERRICK CRUTCHFIELD, in his  
 12 individual capacity,  
 13  
 14 Defendants.

---

15  
 16 Deposition of:  
 17 R.Y.  
 18  
 19 Taken on behalf of the Defendants  
 20 March 26, 2025  
 21 Commencing at 1:00 p.m. (CST)  
 22  
 23  
 24  
 25 REPORTED BY: Tonya D. Stolze, LCR

Page 2

1  
 2 A P P E A R A N C E S  
 3  
 4 For the Plaintiff:  
 5  
 6 MR. JEFFREY D. ZEMAN  
 7 Attorney at Law  
 8 Foundation For Individual Rights  
 9 And Expression  
 10 510 Walnut Street  
 11 Suite 900  
 12 Philadelphia, PA 19106  
 13 (215)717-3473  
 14 jeff.zeman@thefire.org

15  
 16 For the Defendants:  
 17 MR. ANDREW V. SELLERS  
 18 Attorney at Law  
 19 Sellers, Craig & Hayden, Inc.  
 20 P.O. Box 10547  
 21 Jackson, TN 38308  
 22 (731)300-0737  
 23 andrew@schofcounsel.com

24  
 25 REPORTER'S NOTES:  
 26  
 27 QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT  
 28 NECESSARILY REFLECT A DIRECT QUOTE  
 29  
 30 PROPER NAMES ARE PHONETICALLY SPELLED UNLESS STATED  
 31 ON THE RECORD

Page 3

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 2 I N D E X  
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	Page
Examination	5
by Mr. Sellers	
Examination	36
by Mr. Zeman	
Examination	38
by Mr. Sellers	

E X H I B I T S

	Page
(None entered.)	

Page 4

1  
 2 S T I P U L A T I O N S  
 3  
 4  
 5 The deposition of R.Y., was taken by  
 6 Notice, at Tullahoma City Schools Central Office,  
 7 510 South Jackson Street, Tullahoma, Tennessee,  
 8 on March 26, 2025, for all purposes under the  
 9 Federal Rules of Civil Procedure.  
 10 All formalities as to caption, notice,  
 11 statement of appearance, et cetera, are waived.  
 12 All objections, except as to the form of the  
 13 question, are reserved to the hearing, and that  
 14 said deposition may be read and used in evidence  
 15 in said cause of action in any trial thereon or  
 16 any proceeding herein.  
 17 It is agreed that TONYA D. STOLZE, LCR,  
 18 Notary Public and Court Reporter for the State of  
 19 Tennessee, may swear the witness, and that the  
 20 reading and signing of the completed deposition  
 21 by the witness was not discussed.  
 22  
 23  
 24  
 25

1 \* \* \*

2 R.Y.,

3 was called as a witness, and after having been

4 duly sworn, testified as follows:

EXAMINATION

QUESTIONS BY MR. SELLERS:

8 Q. R.Y., once again, my name is Andrew

9 Sellers. I just introduced myself to you just a

10 second ago, and I'm one of the attorneys that's

11 representing the Tullahoma City Schools in a

12 lawsuit that has been brought by B.P. on behalf of

13 her son, I.P. And your name obviously has come up

14 regarding the situation and the facts on the

15 lawsuit, and that's why I wanted to talk to you

16 today.

17 And I certainly appreciate that

18 you've been coordinating with my office about

19 being here today. And I certainly appreciate you

20 showing up today for this deposition. I know

21 it's never any fun.

22 A. Yeah.

23 Q. I'm just here to ask you some

24 questions about what you know about the situation

25 and what your involvement was. Do you understand

1 a yes or a no? Don't be offended by it. We're

2 just wanting to make sure we get a clean record.

3 Okay?

4 A. Yeah, of course.

5 Q. Also, if you will let me finish my

6 question before you begin your answer, and I'll do

7 my best to let you finish your answer before I

8 begin my next question. That way we're not

9 speaking at the same time or talking over one

10 another, which is obviously difficult for the court

11 reporter to get down two people talking at the same

12 time.

13 I also want to make sure you hear my

14 complete question before you begin your answer.

15 Can you do that for me?

16 A. Yes, sir.

17 Q. I don't anticipate that we're going to

18 be here very long today. But if at any point in

19 time you feel like you need to take a break, please

20 let me know and I'll be happy to do that.

21 Now, if I've asked you a question,

22 I'll need you to answer the question before we

23 can take a break. Can you do that?

24 A. Yes, sir.

25 Q. All right. Most importantly if I ask

1 that?

2 A. Uh-huh.

3 Q. Have you ever given a deposition

4 before?

5 A. No, I have not.

6 Q. Okay. Let me give you some basic

7 ground rules. Obviously, I'm here to ask you some

8 questions. If you can give me a good verbal

9 response to my questions, I would appreciate it.

10 Some of them may be a yes or no answer, and I know

11 we all get in the habit of nodding or shaking our

12 heads --

13 A. Yeah.

14 Q. -- for yes and no. And, obviously,

15 I'm across the table from you, and I know what you

16 mean by that. But the court reporter is here today

17 taking everything down that we say.

18 Obviously, it's difficult for her to

19 get a nod or a shake of the head. And also, I

20 know, as southerners, we have a bad habit of

21 saying uh-huh or huh-uh or um-hum for yes and no,

22 if we can refrain from doing that.

23 And it may come a time during the

24 deposition where you do just nod or shake your

25 head or -- and one of us may prompt you, Is that

1 you a question that you don't understand due to me

2 poorly wording the question, make sure you ask me

3 to rephrase or reword my question because I want to

4 make sure you're understanding the question. Okay?

5 A. Yes, sir.

6 Q. All right. Can you state your full

7 name for me one more time?

8 A. My name is R.Y.

9 Q. Okay. And where do you currently

10 live?

11 A. With my parents. Do you want me to

12 say the address?

13 Q. Yes, if you don't mind.

14 A. [REDACTED] -- wait. Yeah.

15 Sorry. We moved recently so --

16 Q. Okay. Is that here in Tullahoma?

17 A. No. That is in Winchester.

18 Q. Winchester. Okay. And you live there

19 with your parents?

20 A. Yes, I do.

21 Q. Okay. Anyone else live there with

22 you?

23 A. My sister. She is in her twenties

24 and then my brother, who is currently in middle

25 school.

1 discussed this with anyone else present or on a  
 2 phone or anything like that?  
 3 A. I mentioned to my best friend, H.C.,  
 4 that I was going to be here today.  
 5 Q. Okay.  
 6 A. But I didn't really explain why.  
 7 Q. Okay. When was the last time you had  
 8 any communication with I.P.?  
 9 A. As of recently, like I would say,  
 10 probably like four or five months by this point.  
 11 Q. Okay. What was -- what was the last  
 12 communication you had with him?  
 13 A. It was probably just like waving  
 14 "Hi, how are you?"  
 15 Q. Okay.  
 16 A. Yeah.  
 17 Q. You've not had any discussion with  
 18 I.P. about giving a deposition today?  
 19 A. No, sir.  
 20 Q. Have you had any discussion with I.P.  
 21 about the deposition that he gave in this matter?  
 22 A. No, sir.  
 23 Q. Okay. Have you discussed with anyone  
 24 that's given a deposition in this matter about  
 25 their deposition testimony?

1 A. No, sir.  
 2 Q. Okay. How did you know I.P.?  
 3 A. We've been going to school together  
 4 since middle school.  
 5 Q. Okay. Did you consider yourself  
 6 friends with I.P.?  
 7 A. Yes, sir.  
 8 Q. Okay. When would you say y'all became  
 9 friends?  
 10 A. Sixth grade.  
 11 Q. Would you consider yourself close  
 12 friends with him?  
 13 A. As of recently, no.  
 14 Q. Okay. During high school did you  
 15 consider yourself to be close friends with him?  
 16 A. Yes, sir.  
 17 Q. Going back to your junior year, which  
 18 is the year this incident occurred, how -- how much  
 19 of the school day were you around I.P.?  
 20 A. I'm sorry. I have to get my classes  
 21 straight in my head.  
 22 Q. Okay.  
 23 A. I would say definitely for band,  
 24 yes, and a lot of after-school stuff because of  
 25 band. So I would say more than like a couple of

1 hours each day.  
 2 Q. Okay. Did you socialize with I.P.  
 3 outside of school or band?  
 4 A. Sometimes.  
 5 Q. How much would you say you socialized  
 6 outside of school activities?  
 7 A. I would say probably just like 30  
 8 minutes to an hour's worth of conversation.  
 9 Q. A day? A week?  
 10 A. A day.  
 11 Q. Okay. Did you follow I.P. on  
 12 Instagram at that time?  
 13 A. Yes, sir.  
 14 Q. Did you follow him on any other kind  
 15 of social media?  
 16 A. No, sir.  
 17 Q. Okay. Were you aware of any other  
 18 social media accounts that he had?  
 19 A. Not that I can recall. No, sir.  
 20 Q. Do you recall when you started  
 21 following I.P. on Instagram?  
 22 A. I would say probably in middle  
 23 school.  
 24 Q. Do you remember what I.P.'s Instagram  
 25 name was?

1 A. No, sir.  
 2 Q. Okay. Do you know whether he had more  
 3 than one Instagram account?  
 4 A. No, sir.  
 5 Q. Okay. So were you following I.P. on  
 6 Instagram your junior year?  
 7 A. Yes, sir.  
 8 Q. Before your junior year did you ever  
 9 see I.P. post or share or repost anything that was  
 10 negative or derogatory regarding the Tullahoma High  
 11 School -- the school administration?  
 12 A. No, sir.  
 13 Q. Okay. Before your junior year did you  
 14 ever see I.P. post, share, or repost anything that  
 15 was derogatory about any teachers at Tullahoma High  
 16 School?  
 17 A. No, sir.  
 18 Q. On August 10th, 2022, which I'll  
 19 represent to you is the day of the incident --  
 20 A. Okay.  
 21 Q. -- were you pulled out of band?  
 22 A. Yes, sir.  
 23 Q. Okay. Who pulled you out of band?  
 24 A. Jason Quick and Ms. Flowers.  
 25 Q. Okay. Did they tell you why they were

Page 17

1 pulling you out of class?  
 2 A. Yes, sir.  
 3 Q. Okay. What did they tell you?  
 4 A. Well, they didn't really tell me  
 5 anything. They kind of just showed me the  
 6 pictures and then were like, Tell us who did this  
 7 because we already know.  
 8 Q. Okay. When you showed -- when you  
 9 said they showed you some pictures -- let me show  
 10 you a couple pictures and you can tell me.  
 11 I'm going to show to you what's  
 12 already been marked as Exhibit Number 1 in this  
 13 case. And does that appear to be a picture of  
 14 Mr. Quick photoshopped into a picture with the Ku  
 15 Klux Klan?  
 16 A. Yes, sir.  
 17 Q. Okay. Was that one of the pictures  
 18 they showed you?  
 19 A. Yes, sir.  
 20 Q. Okay. Let me put in front of you  
 21 what's been marked as number -- Exhibit Number 2 in  
 22 this matter. And does that appear to be a picture  
 23 of Mr. Quick superimposed into a picture with Adolf  
 24 Hitler?  
 25 A. Yes, sir.

Page 18

1 Q. Did they show you that picture?  
 2 A. Yes, sir.  
 3 Q. Did they show you any other pictures  
 4 at that time?  
 5 A. Yes, sir.  
 6 Q. Okay. Let me show you what's been  
 7 marked as Exhibit 3, 4, and 5 in this matter, one  
 8 of which is Mr. Quick dressed up like a cat, one of  
 9 Mr. Quick holding -- Number 4, which has been  
 10 Mr. Quick holding a box of vegetables, and Exhibit  
 11 Number 5, which is Mr. Quick's head placed on a  
 12 cartoon character with the cartoon bird hugging  
 13 him. Did they show you any of these photos?  
 14 A. I remember Exhibit 5 and Exhibit 3.  
 15 Q. Okay. And they showed those to you?  
 16 A. Yes, sir.  
 17 Q. Okay. So they showed you one, two,  
 18 three, and five?  
 19 A. Yes, sir. I couldn't be sure about  
 20 four.  
 21 Q. Okay. Had you ever seen Number 4  
 22 before?  
 23 A. Yes, sir.  
 24 Q. Okay. When did you first see Number  
 25 4?

Page 19

1 A. On I.P.'s Instagram account.  
 2 Q. Okay. Do you remember when you saw it  
 3 on I.P.'s Instagram?  
 4 A. No, sir.  
 5 Q. Okay. Was it before school started?  
 6 A. No, sir.  
 7 Q. Okay. Was it close in time to August  
 8 10th?  
 9 A. I believe so, yes.  
 10 Q. Okay. And his Instagram page was the  
 11 first time you had seen this?  
 12 A. Yes, sir.  
 13 Q. Okay. Had you ever seen it in any  
 14 other form like -- and my understanding is that  
 15 there was an original picture that was then  
 16 modified or added to. This was the only time --  
 17 the only way you've seen this photograph?  
 18 A. Yes, sir. I didn't follow many  
 19 people at the time so...  
 20 Q. Let's talk about Exhibit Number 1,  
 21 which is the KKK picture. Had you ever seen that  
 22 photo before it was shown to you by Mr. Quick and  
 23 Dr. Flowers?  
 24 A. Yes, sir.  
 25 Q. Okay. Where had you seen that picture

Page 20

1 before?  
 2 A. I've seen it somewhere on Instagram.  
 3 I believe it was shared to me by someone. I am  
 4 not entirely sure who, but they discussed that  
 5 they thought it was funny and then they were just  
 6 sharing it around to people.  
 7 Q. Okay. Do you know who created that?  
 8 A. No, sir.  
 9 Q. Okay. Do you know whether that  
 10 picture had been shared with I.P.?  
 11 A. Sorry. No. I'm not too sure. But  
 12 I'm sure he probably saw it beforehand, but I'm  
 13 not entirely too sure because we didn't talk much  
 14 --  
 15 Q. Okay.  
 16 A. -- that day entirely.  
 17 Q. Had you received that -- did you  
 18 receive this picture?  
 19 A. I'm not sure if it was me or someone  
 20 sitting next to me during lunch, but that's when  
 21 I first saw it --  
 22 Q. Okay.  
 23 A. -- is during lunch.  
 24 Q. Do you know how that picture was  
 25 shared during lunch?

Page 21

1 A. No, sir.  
 2 Q. There's some testimony that it was  
 3 airdropped.  
 4 A. Yeah. But I couldn't say for sure.  
 5 Q. Okay.  
 6 A. I am not entirely sure, so I don't  
 7 want to like misconstrue anything.  
 8 Q. Okay. Let's move on to Number 2. Had  
 9 you seen that picture before it was shown to you by  
 10 Mr. Quick and Dr. Flowers?  
 11 A. Yes, sir.  
 12 Q. Okay. Where had you seen that picture  
 13 before they showed it to you?  
 14 A. During lunch.  
 15 Q. How did you see it during lunch?  
 16 A. Either on my phone or someone else's  
 17 phone. I couldn't be too sure.  
 18 Q. Okay. Was it sent by the same person  
 19 that was sharing number -- the KKK photo?  
 20 A. I believe so.  
 21 Q. Okay. So you saw those two photos at  
 22 the same time?  
 23 A. Yeah.  
 24 Q. Okay. Which was during the lunch  
 25 period on August 10th?

Page 22

1 A. Yes, sir.  
 2 Q. Okay. When did you first see Number  
 3 3?  
 4 A. Earlier that day on I.P.'s Instagram  
 5 story.  
 6 Q. Okay. And when had you seen Number 5?  
 7 A. Also on his Instagram story.  
 8 Q. That day or earlier?  
 9 A. That day --  
 10 Q. Okay.  
 11 A. -- like early that day.  
 12 Q. Okay. So Mr. Quick and Dr. Flowers  
 13 pull you out of band, and they show you those four  
 14 pictures?  
 15 A. Uh-huh. Yes, sir.  
 16 Q. And they say, Tell us who did this  
 17 because we already know.  
 18 A. Yes, sir.  
 19 Q. Did they say anything else?  
 20 A. They were just very adamant on me  
 21 trying to say I.P.'s name, but I told them  
 22 straight out that the only two I knew were his  
 23 for sure is five and three. And I said I didn't  
 24 know who made those other two.  
 25 Q. Okay. When you say they were very

Page 23

1 adamant about saying they were I.P.'s, what exactly  
 2 were they saying to you that made you think that?  
 3 A. They said, "We know who did it. We  
 4 know he did all of them", and that they just kept  
 5 repeating that over and over again, even when I  
 6 told them that I knew for sure these two didn't  
 7 come from him because like they're completely  
 8 different programs.  
 9 And they just wouldn't let me say it  
 10 wasn't his to the point where they were trying to  
 11 make me get my phone out and then force me to get  
 12 my phone out to show them I.P.'s Instagram  
 13 account and story. But stories don't last longer  
 14 than like a couple of hours, so I didn't have  
 15 anything to show them. And I was very confused  
 16 and intimidated by Jason Quick.  
 17 Q. Okay. Okay. Help an old man  
 18 understand something, okay, because I'm not a  
 19 social media guru by any stretch.  
 20 A. Yeah.  
 21 Q. You said that three and five were a  
 22 different program than one and two. What did you  
 23 mean by that? Explain that to me.  
 24 A. Because you can see like on the  
 25 outlines of this one, they're very pixilated. On

Page 24

1 this one it's also very like sharp and pixilated.  
 2 On these ones it's very  
 3 loosey-goosey and not time taken at all. And if  
 4 I knew I.P. at the time, if he wanted to make  
 5 something that he thought was artistic, he would  
 6 have taken his time to do it. And these ones are  
 7 just very quickly done in a different program in  
 8 my eyes because it's very chopped up and like  
 9 bleeding in different places.  
 10 And also they're just entirely  
 11 different genres, and I.P. at the time would be  
 12 smart enough not to post those two.  
 13 Q. Okay. I know -- I think I asked you.  
 14 Did you ever know who created Number 1? I think  
 15 you told me no.  
 16 A. No, I do not.  
 17 Q. Do you know who created Number 2?  
 18 A. No, I do not.  
 19 Q. Okay. You said -- you stated you were  
 20 intimidated by Mr. Quick?  
 21 A. Uh-huh.  
 22 Q. What was Mr. Quick doing that was  
 23 intimidating to you?  
 24 A. Every time I took a step back, they  
 25 took a step forward --

Page 25

1 Q. Okay.

2 A. -- to the point where I was like

3 having a very like surface level panic attack.

4 I thought I made it clear that I was

5 very uncomfortable, but they didn't stop moving

6 closer and intimidating me until my band

7 director, Justin Scott, came out and stepped in

8 between us asking them, "What's going on",

9 because I was needed. And that's the only time

10 they backed off is when my band director came out

11 and stopped them.

12 Q. Okay. But at some point did you get

13 your phone out and show them I.P.'s Instagram

14 account?

15 A. Yes, sir.

16 Q. Okay. And my understanding that --

17 the name of his Instagram account was

18 atom\_fag\_heart. Is that right?

19 A. Sorry. At the time maybe but...

20 Q. It's my understanding he's since

21 changed it to like pimping P?

22 A. Yes. I think it's pimping P now.

23 Q. So did you know the meaning behind

24 that Instagram name?

25 A. It's cause he is not entirely

Page 26

1 straight.

2 Q. Okay.

3 A. And he thought it was funny, and it

4 just -- he thought if someone saw his account and

5 didn't like the name, that he probably wouldn't

6 have liked them either.

7 Q. Okay. During the -- after you showed

8 Mr. Quick and Dr. Flowers his Instagram account, do

9 you know whether Dr. Flowers then pulled up his

10 Instagram account on her phone?

11 A. Yes, she did.

12 Q. Okay. Did she show it to you?

13 A. Yes, she did.

14 Q. Okay. When she showed it to you,

15 was -- Exhibit Number 4 where he's holding the

16 vegetables, was it on that Instagram page?

17 A. No, sir.

18 Q. Okay. Were these two on his Instagram

19 page --

20 A. No, sir.

21 Q. -- indicating Number 3 and 5? Had you

22 ever had any discussion with I.P. since about

23 whether he received the KKK or Hitler memes?

24 A. No, sir.

25 Q. Okay. When you -- they got dropped at

Page 27

1 lunch or when people -- did more than one person

2 receive these memes to your knowledge?

3 A. I believe so.

4 Q. Okay. Was there any discussion going

5 on amongst students about these -- the KKK or the

6 Hitler memes?

7 A. Other than me, no.

8 Q. Okay. Who did you have any discussion

9 with about the KKK or Hitler meme?

10 A. I sat with a lot of people at lunch.

11 I knew it was a girl but I don't...

12 Q. Okay. Does the name A.L. mean

13 anything to you?

14 A. I have no idea who that is.

15 Q. Okay. You weren't friends with A.L.?

16 A. No.

17 Q. Okay. When Mr. Quick and Dr. Flowers

18 came and spoke to you, did they mention the name L?

19 A. I know I said L because that's what

20 I.P. preferred to go by the time -- at the time,

21 but I don't know if they said L.

22 Q. Okay. So were they mentioning I.P. by

23 name when they came and spoke with you when they

24 were saying they know he did it?

25 A. There was a point in time where

Page 28

1 Mr. Quick said, We know it was I.P., kind of like

2 that.

3 Q. Okay. Okay. After you went back into

4 the band -- or, I think, you were in the gym at the

5 time; is that right?

6 A. Yes, sir.

7 Q. Okay. After you returned to band

8 class, did you have any discussions with I.P. about

9 what had occurred in the hallway?

10 A. I cannot recall.

11 Q. Okay.

12 A. I was kind of shaken up for a little

13 while in the gym after that so I don't really

14 remember a lot of things from class.

15 Q. Okay. When was the next time you

16 heard anything about the situation with I.P.?

17 A. When I was told I might be

18 subpoenaed.

19 Q. Okay. Well, did you --

20 A. Well, it was also on the news.

21 Sorry.

22 Q. Okay.

23 A. Yeah.

24 Q. Well, let me ask you this question.

25 Did you have any further communication with I.P.

# EXHIBIT K

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
 2 EASTERN DISTRICT OF TENNESSEE  
 3 AT WINCHESTER DIVISION

---

4 I.P. a minor, by and through B.P.,  
 5 Plaintiff,  
 6 vs. No. 4:23-cv-00026  
 7 TULLAHOMA CITY SCHOOLS, a  
 8 political subdivision of the  
 9 State of Tennessee; JASON QUICK,  
 10 in his individual capacity; and  
 11 DERRICK CRUTCHFIELD, in his  
 12 individual capacity,  
 13  
 14 Defendants.

---

15  
 16 Deposition of:  
 17 JUSTIN T. SCOTT

18  
 19 Taken on behalf of the Plaintiffs  
 20 March 26, 2025  
 21 Commencing at 9:00 a.m. (CST)

---

22  
 23  
 24  
 25 REPORTED BY: Tonya D. Stolze, LCR

Page 2

1  
 2 A P P E A R A N C E S  
 3  
 4 For the Plaintiff:  
 5  
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 19 Sellers, Craig & Hayden, Inc.  
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 21 Jackson, TN 38308  
 22 (731)300-0737  
 23 andrew@schofcounsel.com

24  
 25 REPORTER'S NOTES:  
 26  
 27 QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT  
 28 NECESSARILY REFLECT A DIRECT QUOTE  
 29  
 30 PROPER NAMES ARE PHONETICALLY SPELLED UNLESS STATED  
 31 ON THE RECORD

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Page

Examination 5  
 by Mr. Zeman

Page

E X H I B I T S

Exhibit No. 71 66  
 Statement  
 Exhibit No. 72 67  
 Expanded Final Statement

Page 4

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 2 S T I P U L A T I O N S  
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The deposition of JUSTIN T. SCOTT, was  
 taken by Notice, at Tullahoma City Schools  
 Central Office, 510 South Jackson Street,  
 Tullahoma, Tennessee, on March 26, 2025, for all  
 purposes under the Federal Rules of Civil  
 Procedure.

All formalities as to caption, notice,  
 statement of appearance, et cetera, are waived.  
 All objections, except as to the form of the  
 question, are reserved to the hearing, and that  
 said deposition may be read and used in evidence  
 in said cause of action in any trial thereon or  
 any proceeding herein.

It is agreed that TONYA D. STOLZE, LCR,  
 Notary Public and Court Reporter for the State of  
 Tennessee, may swear the witness, and that the  
 reading and signing of the completed deposition  
 by the witness was not discussed.

Page 5

1 \* \* \*

2 MR. ZEMAN: Okay. So, Andrew, I

3 should mention, prior to Mr. Scott's testimony, I

4 just wanted to put our stipulation about

5 Dr. Norris on the record. Is that all right?

6 MR. SELLERS: Sure.

7 MR. ZEMAN: Okay. Great. So we had

8 originally discussed deposing a 30(b)(6) witness

9 on behalf of the school district. But based on a

10 conversation via e-mail a few weeks ago, and

11 based on your representations that that 30(b)(6)

12 witness originally -- was originally going to be

13 Dr. Norris, would not have any additional

14 testimony regarding the school district's

15 knowledge of any additional justifications for

16 I.P.'s suspension, including alleged disruption

17 caused by any of the images -- any Exhibits 1

18 through 5, beyond that to which Mr. Quick and

19 Mr. Crutchfield and Dr. Flowers have already

20 testified, any additional communications about

21 any of the images in Exhibits 1 through 5,

22 students, teachers, staff or parents, beyond that

23 to which Mr. Quick and Mr. Crutchfield and

24 Dr. Flowers have already testified. Does that

25 sound --

Page 6

1 MR. SELLERS: That's correct. Yes.

2 MR. ZEMAN: Great. Thank you.

3

4 \* \* \*

5 JUSTIN T. SCOTT,

6 was called as a witness, and after having been

7 duly sworn, testified as follows:

8

9 EXAMINATION

10 QUESTIONS BY MR. ZEMAN:

11 Q. All right. So good morning,

12 Mr. Scott, again.

13 A. **Good morning.**

14 Q. And you understand that you're here

15 today to provide testimony in connection with an

16 ongoing lawsuit?

17 A. **Yes.**

18 Q. Okay. So before we get going, I want

19 to make you aware we've been doing this -- we've

20 been doing this with all the witnesses. We're

21 going to be talking about some people who were

22 minors at the time --

23 A. **Uh-huh.**

24 Q. -- of the events. And to protect

25 their privacy, the transcript will show only their

Page 7

1 initials. But when I ask you questions and you

2 provide answers, you can feel free to use their --

3 A. **Okay.**

4 Q. -- full names. Our court reporter

5 here, Tonya, will change them to initials after the

6 fact. Does that make sense?

7 A. **Yes.**

8 MR. ZEMAN: Okay. Is that correct,

9 Andrew?

10 MR. SELLERS: Yes. That's correct.

11 BY MR. ZEMAN:

12 Q. All right. And you understand your

13 testimony today is being given under oath just as

14 if you were giving testimony in a courtroom in

15 front of a judge or a jury?

16 A. **Yes.**

17 Q. Have you ever given a deposition

18 before?

19 A. **No.**

20 Q. All right. A few ground rules before

21 we get started. So our court reporter here, Tonya,

22 is taking a verbatim transcript of everything we

23 say.

24 A. **Okay.**

25 Q. So you need to be sure to verbalize

Page 8

1 your answers. No shakes of the head or just

2 uh-huhs. Make sense?

3 A. **Correct. Yes.**

4 Q. Great. You and I can't speak at the

5 same time, so please let me finish my questions.

6 I'll let you finish your answers. I'm sure we'll

7 mess that up at some point, but we're going to try

8 our best. Okay?

9 A. **Okay.**

10 Q. And if you don't understand a

11 question, let me know. I'll rephrase, repeat,

12 whatever you need.

13 A. **Okay.**

14 Q. And if you answer a question, I'm

15 going to assume that you understood the question;

16 is that fair?

17 A. **Yes.**

18 Q. If you need to take a break at any

19 time, that's fine. Just let us know. But if I

20 have asked a question and you have yet to answer,

21 we're going to wait for you to answer the question

22 before we go on a break. All right?

23 A. **Okay.**

24 Q. Also, from time to time, Andrew,

25 counsel for the school district, may object to one

1 **A. I do not remember.**  
 2 Q. Okay. Did you investigate whether  
 3 other students had, in fact, received these images  
 4 --  
 5 **A. No.**  
 6 Q. -- one and two?  
 7 **A. No.**  
 8 Q. Are you aware of anyone investigating  
 9 whether other students had, in fact, received these  
 10 images outside what you've already described about  
 11 R.Y. being pulled out of band?  
 12 **A. No.**  
 13 Q. All right. I'd like to direct your  
 14 attention to August 10, 2022.  
 15 **A. Okay.**  
 16 Q. Were you aware on that day that  
 17 Tullahoma High School administrators were  
 18 investigating the images in Exhibits 1 through 5  
 19 that day?  
 20 **A. Not until I was called into the**  
 21 **office with I.P.**  
 22 Q. Okay. So did the -- when R.Y. was  
 23 pulled out of band class, was that before or after  
 24 you were called into the office with I.P.?  
 25 **A. Before.**

1 Q. Okay. When?  
 2 **A. I do not recall.**  
 3 Q. Okay.  
 4 **A. I do know that became knowledge to**  
 5 **me at some point, but I don't remember when.**  
 6 Q. Around that time or --  
 7 **A. Around that time, yes.**  
 8 Q. So what did you know about R.Y.  
 9 being -- just if you could describe to me what  
 10 happened when R.Y. was pulled out of class?  
 11 **A. The only thing I recall is that she**  
 12 **was questioned about her knowledge of where the**  
 13 **photos came from. That's the extent of what I**  
 14 **know that she was questioned about.**  
 15 Q. Okay. So --  
 16 **A. Because I was not present in any of**  
 17 **her questioning.**  
 18 Q. Okay. If you would just tell me from  
 19 your perspective, you're teaching band August 10,  
 20 2022 --  
 21 **A. Yeah.**  
 22 Q. -- and R.Y. gets pulled out, what  
 23 happens that you could observe?  
 24 **A. I just see her pulled out of the**  
 25 **gymnasium, and I just continue to run class.**

1 Q. Okay.  
 2 **A. Yeah. That was during the actual**  
 3 **band class. I was actively teaching by myself**  
 4 **that day because Lisa was out sick.**  
 5 Q. Okay. What time was that class?  
 6 **A. It would have been in fourth block,**  
 7 **so it would have occurred between roughly 2:00**  
 8 **p.m. and 3:15 p.m. is the -- is the time of that**  
 9 **class. Due to weather we were in the upper gym**  
 10 **that day working on marching fundamentals inside.**  
 11 Q. Okay. And so I guess what did you  
 12 know about why R.Y. was being pulled out of  
 13 class --  
 14 **A. At the time, nothing.**  
 15 Q. Okay.  
 16 **A. I did not know what was going on.**  
 17 Q. Okay. So at some point then you  
 18 testified just a moment ago that R.Y. was pulled  
 19 out of class and questioned about Images 1 and 2 --  
 20 **A. Let me clarify. She was questioned**  
 21 **at the time. I didn't know what she was being**  
 22 **questioned about.**  
 23 Q. At some point you learned what she was  
 24 being questioned about?  
 25 **A. Yes, after the fact later.**

1 Q. Okay.  
 2 **A. Really, I don't recall anything else**  
 3 **because I'm teaching.**  
 4 Q. Who pulled her out of class?  
 5 **A. I believe it was admin, but I do not**  
 6 **remember who.**  
 7 Q. Okay. And is that typical? Kids  
 8 being pulled out of band class by admin, does  
 9 that --  
 10 **A. Typical? No.**  
 11 Q. Okay.  
 12 **A. Not with band students, no.**  
 13 Q. Okay. So were you surprised to see  
 14 that happen?  
 15 **A. Yeah.**  
 16 Q. Okay.  
 17 **A. Yeah. Any time a student is being**  
 18 **questioned by admin, that's a surprise.**  
 19 Q. Okay. How long was R.Y. out of class  
 20 for, if you can remember?  
 21 **A. A few minutes.**  
 22 Q. Okay. And so you answered that. At  
 23 any point while R.Y., who had been pulled out by  
 24 admin, did you go out and --  
 25 **A. I do not recall.**

1 Q. Obviously, you must have left. You're  
 2 here. But where did you go next?  
 3 **A. To Crutchfield's office.**  
 4 Q. Okay. So why did you leave  
 5 Mr. Quick's office?  
 6 **A. I just wanted to go check on I.P.**  
 7 Q. Okay. And did you have any  
 8 understanding about what was going to happen in  
 9 Mr. Crutchfield's office at that point?  
 10 **A. No.**  
 11 Q. Okay. In terms of what -- do you know  
 12 why they went to Mr. Crutchfield's office or did  
 13 you know at that time?  
 14 **A. At the time, no, I did not know.**  
 15 **Huh-uh.**  
 16 Q. Okay. So did you go directly from  
 17 Mr. Quick's office to Mr. Crutchfield's office?  
 18 **A. Yes.**  
 19 Q. What happened in Mr. Crutchfield's  
 20 office that you observed?  
 21 **A. When I walked in, I.P. was already**  
 22 **in a state of distress. Crutchfield was**  
 23 **attempting to contact Mom. I.P. at that point**  
 24 **was having what I viewed to be a panic attack,**  
 25 **heavy breathing, muscles tensing up, some crying.**

1 **recall who -- a wheelchair was brought in. And**  
 2 **he started to calm down some to the point where**  
 3 **they were able to start getting him in the**  
 4 **wheelchair, and then it was around that time that**  
 5 **I left the meeting and left the office.**  
 6 Q. So how long were you -- were you in  
 7 Mr. Crutchfield's office in total?  
 8 **A. It was around to my best**  
 9 **recollection, I'd say, 20 to 30 minutes maybe.**  
 10 Q. Do you recall what time you entered  
 11 his office?  
 12 **A. Huh-uh. I do not.**  
 13 Q. Okay.  
 14 **A. It was after -- after 3:15 because I**  
 15 **know it was after school. The exact time I don't**  
 16 **recall.**  
 17 Q. Do you recall what time you left?  
 18 **A. After 4:00 p.m. I know that.**  
 19 **Exactly when I don't -- I don't recall.**  
 20 Q. Do you recall where you went after  
 21 that?  
 22 **A. I recall going back to the band room**  
 23 **getting my items and going home.**  
 24 Q. Okay.  
 25 **A. Yeah.**

1 **And he wasn't really able to speak very much.**  
 2 **So I was standing beside I.P., as**  
 3 **Mr. Crutchfield was trying to reach Mom and**  
 4 **trying to calm him down. I don't recall the**  
 5 **amount of time it took for Mom to get there. Mom**  
 6 **did eventually arrive.**  
 7 **When Mom arrived she knelt down in**  
 8 **front of I.P., looked at him, and said "Is this**  
 9 **about the photos?" Then she turned to myself and**  
 10 **Quick and said "What caused him to get into this**  
 11 **state?" And to the best of my knowledge I recall**  
 12 **Mr. Quick saying, I simply administered his**  
 13 **punishment to which he had that response.**  
 14 **She proceeded to calm him down with**  
 15 **breathing and talking to him. Mr. Crutchfield at**  
 16 **that point asked if she would like to call an**  
 17 **ambulance. She refused and said "Not after the**  
 18 **way we were treated last time."**  
 19 **Following that she proceeded to call**  
 20 **what I took as various therapists, and I remember**  
 21 **corner -- she called Cornerstone asking if she**  
 22 **could be seen that day. All of them, when she**  
 23 **described his state and condition, suggested he**  
 24 **be taken to the ER, which she again refused.**  
 25 **And then at some point -- I do not**

1 Q. All right. So you said that I.P. was  
 2 already in a state of distress when you walked into  
 3 Mr. Crutchfield's office. Where -- where in the  
 4 office was I.P.?  
 5 **A. He was sitting in the chair in front**  
 6 **of his desk facing Mr. Crutchfield.**  
 7 Q. Okay. And what -- how was he  
 8 positioned in the chair, if you recall?  
 9 **A. Slightly hunched over. And at that**  
 10 **point his muscles were already starting to tense**  
 11 **up a little bit.**  
 12 Q. Okay.  
 13 **A. A little bit of mild rocking --**  
 14 Q. Okay.  
 15 **A. -- and head kind of down.**  
 16 Q. Okay.  
 17 **A. Uh-huh.**  
 18 Q. And did his condition -- while you  
 19 were in there, did it improve? Did it get worse?  
 20 **A. It got worse at the start of when I**  
 21 **was there.**  
 22 Q. Okay.  
 23 **A. It continued to heighten after his**  
 24 **mother got there. And then near or around the**  
 25 **time when they were getting to the point of**

# EXHIBIT L

G



Catherine Stephens <catherine.stephens@tcsedu.net>

**Re: Clarification**

1 message

**Jason Quick** <jason.quick@tcsedu.net>  
To: b [REDACTED] <b [REDACTED]@gmail.com>  
Cc: Derrick Crutchfield <derrick.crutchfield@tcsedu.net>  
Bcc: catherine.stephens@tcsedu.net

Tue, Aug 16, 2022 at 9:42 AM

Ms. P [REDACTED], thank you for the email and request for clarification on the disciplinary incident regarding I [REDACTED] from last week. Below are responses to your questions. Should you have any additional questions or require further clarification, please do not hesitate to contact me. We were looking forward to seeing I [REDACTED] at school today as his suspension has ended. Unfortunately, he was not in his first block class and our hope is all is ok. We all look forward to his return including our faculty, his friends, and bandmates.

Best,  
Jason Quick



1) What is the specific behavior for which I [REDACTED] was suspended?

- Please see the excerpt from the student handbook:

**VIDEOS/PHOTOS**

Any student who records and/or disseminates in any manner an unauthorized or misrepresented photograph, video, or recording for the purpose of embarrassing, demeaning, or discrediting the reputation of any student or staff, or that results in the embarrassment, demeaning, or discrediting of any student or staff, or results in any action or activity disruptive to the educational process shall be subject to disciplinary action up to and including suspension or expulsion at the discretion of the principal.

2) What specific rules worthy of suspension is I [REDACTED] alleged to have violated?

- Please see the excerpt from the student handbook:

**VIDEOS/PHOTOS**

Any student who records and/or disseminates in any manner an unauthorized or misrepresented photograph, video, or recording for the purpose of embarrassing, demeaning, or discrediting the reputation of any student or staff, or that results in the embarrassment, demeaning, or discrediting of any student or staff, or results in any action or activity disruptive to the educational process shall be subject to disciplinary action up to and including suspension or expulsion at the discretion of the principal.

3) What evidence did the school rely upon to come to the conclusion that I [REDACTED] had given the school a reason to suspend him?

I [REDACTED] admitted to creating at least three of the images that were located on his Instagram page. The images fall under the sections provided above from the student handbook

4) I [REDACTED] denied having anything to do with the Hitler and KKK pictures; if the school did not believe his denial, on what evidence (if any) did the administration base its disbelief in I [REDACTED]'s denial?

The focus of the concern was on images being created by I [REDACTED] to which he admitted to three of those presented and housed on his Instagram page.

5) Who decides the length of a suspension and what factors are considered in making such a determination?  
All discipline is at the discretion of the administration as indicated in the previous excerpt from the student handbook.

6) Who decided to shorten the duration of I [REDACTED]'s suspension and what factors were considered in deciding to shorten the duration of the suspension?

After reconsidering the totality of the offense and consulting the student handbook and board policy, Mr. Crutchfield concluded that five days was too long of a suspension for I [REDACTED] and three days was more appropriate. Our preference is to keep students in the building and in the classroom as much as possible depending on the behavioral offense.

7) What are the conditions for readmission?

The student can return to school after his three-day suspension. The student is to return to school on Tuesday, August 16, 2022. No other conditions exist for his return as we look forward to having I [REDACTED] back!

8) What are the school's and the teacher's expectations of I [REDACTED] in regard to making up schoolwork he missed during the suspension?

The expectation for any student who is suspended from school is to remain current in his/her classes as much as possible. Upon returning, the student has the same number of days to catch up on missed work as the days suspended. In this case, I [REDACTED] will have three days upon his return on Tuesday, August 16, 2022.

On Mon, Aug 15, 2022 at 11:26 PM b [REDACTED] <b [REDACTED]@gmail.com> wrote:

On August 10, both I [REDACTED] and I were told that he was being suspended for five days. I had to guess at the basis for I [REDACTED]'s suspension because the school did not specify what behavior it contended warranted the suspension. My understanding was that he was being suspended because the administration believed that I [REDACTED] was the source of two offensive pictures reported to Mr. Quick by another student: specifically, the images of Mr. Quick superimposed on images including Hitler and members of the Ku Klux Klan.

On August 12, I met with Mr. Crutchfield, later joined by Mr. Quick. Mr. Crutchfield stated that after we left on the 10th, he had gone into the computer and changed the suspension to three days; he did not explain the reason for changing the duration of the suspension and he did not confirm this change in writing. In the subsequent meeting with Mr. Quick, I asked for an explanation of how the pictures came to the administration and on what basis they concluded that I [REDACTED] was the source. Mr. Quick stated that those pictures were not the

reason for the suspension, but he still did not explain what *was* the basis for the suspension. Most concerningly, no one within the school's administration identified any specific behavior that I [REDACTED] allegedly engaged in that even remotely approached the severity of *any* of the fourteen "Reasons for Suspension/Expulsion/Remand" laid out by the Tennessee State Board of Education. In light of the school's failure to explain the basis for the suspension, I [REDACTED] has no idea what he's been punished for or what behavior the school expects him to avoid in the future. This is unacceptable.

Therefore, in addition to an official, written confirmation that the suspension has formally been shortened from five days to three days, I require a written response clarifying the following issues:

- 1) What is the specific behavior for which I [REDACTED] was suspended?
- 2) What specific rules worthy of suspension is I [REDACTED] alleged to have violated?
- 3) What evidence did the school rely upon to come to the conclusion that I [REDACTED] had given the school a reason to suspend him?
- 4) I [REDACTED] denied having anything to do with the Hitler and KKK pictures; if the school did not believe his denial, on what evidence (if any) did the administration base its disbelief in I [REDACTED]'s denial?
- 5) Who decides the length of a suspension and what factors are considered in making such a determination?
- 6) Who decided to shorten the duration of I [REDACTED]'s suspension and what factors were considered in deciding to shorten the duration of the suspension?
- 7) What are the conditions for readmission?
- 8) What are the school's and the teachers' expectations of I [REDACTED] in regard to making up schoolwork he missed during the suspension?

B [REDACTED] P [REDACTED]

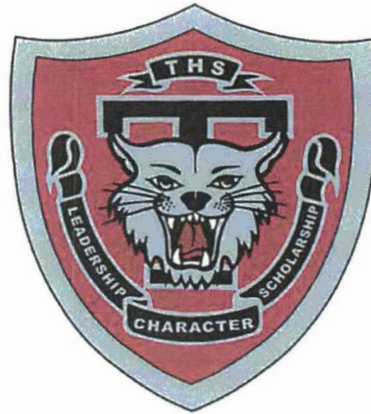


**Jason Quick**  
Principal  
Tullahoma High School  
927 N. Jackson Street  
Tullahoma, Tennessee 37388  
931.454.2620

Tullahoma  
High School



# EXHIBIT M



# TULLAHOMA HIGH SCHOOL

Home of the Wildcats

2022-2023

Student and Parent/Guardian Handbook

[www.tullahomahighschool.net](http://www.tullahomahighschool.net)

## **ADMINISTRATION**

- Principal - Mr. Jason Quick
- Assistant Principal - Dr. Renee Flowers
- Assistant Principal - Mrs. Jessie Kinsey
- Assistant Principal - Mr. Derrick Crutchfield

## **SCHOOL CONTACT INFORMATION**

- Main Office - (931) 454-2620
- Counseling Office - (931) 454-2625
- Cafeteria - (931) 454-2631

## **TO OUR STUDENTS AND PARENTS/GUARDIANS**

On behalf of our faculty and staff, we welcome you to Tullahoma High School. We look forward to assisting you in fulfilling your educational goals and becoming a lifelong learner. THS has a history of exemplary academic and co-curricular accomplishments. We expect you to meet the goals set and to carry on the tradition of excellence. We are here to make your years in school as successful yet educationally challenging as possible. **YOUR GRADUATION IS OUR EXPECTATION!**

This handbook has been prepared to explain and clarify the procedures, policies, and regulations at Tullahoma High School. The administration reserves the right to change programs, policies, fees, etc., as necessary and without prior notice.

The handbook is not meant to be all-inclusive of rules and expectations. It is not a substitute for common sense, honesty, and making good choices.

You are urged to contact us if you have any questions. Thank you for your support as we strive to meet the needs of all our students.

## **TULLAHOMA HIGH SCHOOL CORE VALUES**

What we believe:

- People are responsible for their choices.
- An environment of high expectations results in higher achievement.
- Great communities are built on mutual respect and dignity for all people.
- Integrity is essential to creating and sustaining positive relationships.
- Embracing diversity contributes to the strength of a community.
- The pursuit of learning as a life-long endeavor is essential to individual and organizational success.
- Cooperation, collaboration, and communication are essential to success.

## 2022-2023 Quarter Breakdown

### Quarter 1

July 25 - 29	Teacher Inservice
August 1	First day of school - 1:00 Student Dismissal
August 24	1:00 dismissal
September 5	NO SCHOOL - Labor Day
September 19 - 23	Parent/Teacher Conferences
September 21	1:00 dismissal
October 3 - 7	NO SCHOOL - Fall Break

### Quarter 2

November 9	1:00 dismissal
November 21 - 25	NO SCHOOL - Thanksgiving Break
December 14	1:00 dismissal
December 15	Exams (1st & 3rd) - 1:00 dismissal
December 16	Exams (2nd & 4th) - 1:00 dismissal
December 19 - 30	NO SCHOOL - Christmas Break

### Quarter 3

January 2	Teacher Inservice
January 16	Teacher Inservice
February 27 - March 3	Parent/Teacher conferences (3:15-7:15)
February 20	Teacher Inservice
March 1	1:00 dismissal
March 13 - 17	NO SCHOOL - Spring Break

### Quarter 4

April 7	NO SCHOOL - Good Friday
April 19	1:00 dismissal
May 4	Sr. Exams (1st & 3rd) - 3:15 dismissal
May 5	Sr. Exams (2nd & 4th) - 3:15 dismissal
May 5	Sr. Grades entered by 3:00pm
May 10	1:00 dismissal
May 12	Graduation
May 17	Exams (4th - 1:15-3:15) - 3:15 dismissal
May 18	Exams (1st and 3rd) - 1:00 dismissal
May 19	Exams (2nd - 8:15-10:15) - 10:15 dismissal
May 19	Last day of school

### Bell Schedule

	<b>3:15 Dismissal</b>	<b>1:00 Dismissal</b>
<b>1st Bell</b>	8:10	8:10
<b>1st Block</b>	8:15 - 9:30	8:15 - 9:05
<b>2nd Block</b>	9:37 - 10:52	9:12 - 10:02
<b>3rd Block (4 Lunch Shifts)</b>	10:59 - 1:00	10:09 - 12:05
<b>PAWS</b>	1:07 - 1:53	NO PAWS
<b>4th Block</b>	2:00 - 3:15	12:12 - 1:00

### Lunch Times

	<b>3:15 Dismissal</b>	<b>1:00 Dismissal</b>
<b>1st (Science Hall, Band)</b>	11:00 - 11:25	10:25 - 10:50
<b>2nd (Vocational Hall, English Hall)</b>	11:30 - 11:55	10:50 - 11:15
<b>3rd (Social Studies Hall, Main Hall, Spanish)</b>	12:00 - 12:25	11:15 - 11:40
<b>4th (Garrison Wing, Lower Gym, JROTC)</b>	12:30 - 12:55	11:40 - 12:05

#### **3:15 Dismissal**

- Classes will be 75 minutes long.
- PAWS will be 46 minutes long.
- Students will have 7 minutes between classes.

#### **1:00 Dismissal**

- Classes will be 50 minutes long.
- No PAWS
- Students will have 7 minutes between classes.

### 1-Hour Delay Bell Schedule

	<b>3:15 Dismissal</b>	<b>1:00 Dismissal</b>
<b>1st Bell</b>	9:08	9:08
<b>1st Block</b>	9:15 - 10:20	9:15 - 9:55
<b>2nd Block</b>	10:27 - 11:32	10:00 - 10:40
<b>3rd Block (4 Lunch Shifts)</b>	11:39 - 1:37	10:45 - 12:10
<b>PAWS</b>	NO PAWS	NO PAWS
<b>4th Block</b>	1:44 - 3:15	12:15 - 1:00

**Lunch Times**

	<b>3:15 Dismissal</b>	<b>1:00 Dismissal</b>
<b>1st (Science Hall, Band)</b>	11:40 - 12:05	10:30 - 10:55
<b>2nd (Vocational Hall, English Hall)</b>	12:10 - 12:35	10:55 - 11:20
<b>3rd (Social Studies Hall, Main Hall, Spanish)</b>	12:40 - 1:05	11:20 - 11:45
<b>4th (Garrison Wing, Lower Gym, JROTC)</b>	1:10 - 1:35	11:45 - 12:10

**3:15 Dismissal**

- Classes will be 65 minutes long.
- NO PAWS
- Students will have 7 minutes between classes.

**1:00 Dismissal**

- Classes will be 45 minutes long.
- No PAWS
- Students will have 7 minutes between classes.

**STUDENT VEHICLES/ PARKING**

Driving to school is a privilege, not a right. Students who wish to drive to school must have a valid driver's license, car registration, and current insurance.

- All students who drive and wish to park on campus must purchase a parking permit. The cost of purchasing a parking permit is \$10.00.
- A school parking permit must be visible and easily seen hanging from the rearview mirror.
- Students are not allowed to park in front of the school, behind the school (except for ROTC), or in spots labeled "S" (Staff).
- A parking fine of \$5.00 will be given when a student is incorrectly parked or parked on campus without a permit.
- Students may not enter their cars during the school day without permission. No loitering in parking areas is permitted at any time.
- The license number of any vehicle a student will drive to school must be registered in the main office.
- The speed limit on the school campus is (10) ten miles per hour.
- Vehicles are to be parked in lined spaces. Do not park on grass or sidewalks.
- Any vehicle parked on school grounds is subject to search at any time (24 hours a day).
- **Driving privileges may be revoked for multiple violations, reckless driving, speeding, or excessive first-period tardies.**

Students who fail to operate their vehicle safely or do not follow the guidelines are subject to disciplinary action and/or revocation of driving and parking privileges.

### **ATTENDANCE: TO REPORT AN ABSENCE: 454-2620**

Attendance is essential to learning, and therefore, students are expected to be present each day school is in session.

#### **When a student is absent from school, one of the following actions should be taken:**

- The student's parent/guardian should call the school (454-2620).
- The student should bring a note signed by their parent/guardian with the reason and date of the absence.
- The student should bring a doctor's note within 3 days of their return to school.

Students are responsible for making up missed work. Missed work should be made upon the first day you return to school. In unusual cases where multiple days are missed due to illness or tragedy, students are expected to make up work within three (3) days of their return to school. If there is a prolonged absence of ten (10) days or more, a student may be granted additional days to complete missed work and tests. Homebound instruction may be available for students who have a lengthy illness. Contact the Attendance Director at 454-2600 for information concerning homebound instruction.

#### **The following reasons for absences or tardiness are excused:**

- Personal illness (verifications from a physician will be required after a student has missed any class more than five (5) times);
- Serious illness or death in the immediate family;
- A doctor or dental appointments that cannot be scheduled after school hours; 4.
- Appearance in court (must have official note);
- Authorized religious holidays;
- School functions; any student absent from school for a school function must be in good standing academically in all classes in which they are currently enrolled;
- Absences or tardiness approved in advance by THS administration;

- Circumstances which in the judgment of the principal create emergencies over which the student has no control.

### **ATTENDANCE POLICY**

- After five (5) absences without a doctor's excuse, class absences will automatically become unexcused. When a student receives medical attention from a physician or dentist, he/she should return to school with a statement from the doctor or dentist listing the days the student should be excused.
- A student may be absent from a particular class for school-related activities only three (3) times for any one activity or class during the semester except for state and national contests. State and national contests are those in which a student must earn the right to compete.
- A student absent without proper excuse or absent due to out-of-school suspension may be allowed to make up assignments at the teacher's discretion. However, a student will receive an opportunity to make-up term exams, unit tests, and/or major projects.

### **ATTENDANCE PROCEDURES**

As the school year progresses, the following procedures will be initiated for school absences:

- Five (5) unexcused days absent – parent/guardian notified by mail;
- Ten (10) unexcused days absent –parent/ guardian notified by letter; referral to Attendance Officer.
- Juvenile Court referral is at the discretion of the Tullahoma City Schools Attendance Officer. A student with a pattern or history of unexcused absences is subject to Juvenile Court action at any time.

Students with excessive absences, regardless of reason, may be required to remain at school rather than participate in co-curricular activities, sports, field trips, etc. Attendance during the academic day is the first priority of responsibility.

### **CHECKING IN/OUT OF SCHOOL**

- Students who arrive after 8:15 or leave before 3:15 must check-in/out at the attendance office.
- Please do not call or email the attendance office and ask for a student to be released. We do not accept phone calls or emails to release a student from campus. A parent or someone listed in the student's emergency contact list must physically sign the student out. Please be prepared to come into school to sign out your child when needed.
- Please bring your driver's license/ID when picking up a student. For the safety of our students, we require a photo ID for verification. Only those individuals listed in the student's data file will be allowed to sign out a student. The student must also come to the attendance office to check out before leaving the building.
- If your student drives and has a medical/dental appointment or court date, the student must present a signed note to the attendance office on the same day they leave campus. All notes must be received at least one hour before check-out. All notes will be verified using the contact information in the student's data file. Without a written notification, a student who drives may only leave campus if a parent or someone from the emergency contact list comes into the school and signs them out.
- All students will incur an unexcused absence for their time off campus unless they return with a formal doctor's note or a note from the court clerk within 72 hours of the absence.
- Please remember, If your child becomes sick while at school, he/she must be seen in the school nurse's office before leaving campus due to illness. If your student is too ill to attend classes, please be prepared to come to school to sign your child out for the day.
- 18-year-old students are **NOT** permitted to check themselves out of school.

## EARLY ARRIVAL & LATE PICKUP

- Cafeteria doors open at 7:00.
- Students who arrive before 7:30 must report to the cafeteria. After 7:30, students must report to the cafeteria or the gym.
- Students must leave the building no later than 3:30 unless assigned to tutoring or extra-curricular activities under staff supervision.
- Once on campus, the student must enter the building and proceed to an assigned area.
- Once on campus, a student is not permitted to leave the premises without approval from a school administrator.

## CAFETERIA

- No food or drink (except water) are allowed outside the cafeteria.

FOOD PRICES 2022-23										
BREAKFAST PRICES										
ELE/JTF/BAE/EMS	THS/REL/WMS			REDUCED PRICE		STAFF	VISITOR			
UNIVERSAL FREE	\$1.25			\$0.30		\$2.25	\$2.25			
LUNCH PRICES										
								VISITOR	SPECIAL	
ELE/JTF/BAE/EMS	REL	WMS	THS	REDUCED		STAFF			MEALS	
UNIVERSAL FREE	\$2.00	\$2.50	\$3.00	\$0.40		\$4.00	\$4.00		\$6.00	
A LA CARTE PRICES										
BREAKFAST										
Juice	\$0.75	Pancake (1)			\$1.50	Sausage/Ham		\$1.25		
Muffin	\$1.75	Hot Pocket			\$2.50	Pop Tart (each)		\$1.25	2pk	\$2.00
Biscuit	\$2.00	Toast			\$0.50	Milk		\$0.55		
Waffle (1)	\$1.50	Egg			\$1.00					
Donuts	\$1.50	Cereal			\$1.00	Jelly/Syrup		\$0.35		
DELUXE biscuit	\$3.00	Honey Bun or Frudel			\$1.00	Cream Cheese		\$0.50		
		Cereal Bar			\$1.00					
LUNCH										
Dill Spears \$0.35	Extra Meat, Chili, Soup			\$2.75		Tea THS ONLY		\$1.00		
Cookies \$0.50	Ala Carte Meat, Chili, Soup			\$3.50		Ice Cream		\$1.00		

Other Desserts \$0.50		Extra Sandwich, Pizza			\$2.75	Yogurt or Gogurt		\$1.00
Fruit Slushies \$0.75		Ala Carte Sandwich, Pizza			\$3.25	Chips and Snacks		\$1.00
BIG WATERS \$1.50						Bottled Water		\$1.00
Cheese Slice \$0.30		Extra Vegetable or Fruit			\$1.00	Medium Juice		\$1.00
String Cheese \$0.75		Ala Carte Vegetable or Fruit			\$1.50	Small Juice		\$0.75
Switch/Envy \$1.25		French Fries			\$1.50	Milk, half-pint		\$0.55
G2 \$1.50		Saltines or 2 small packs			\$0.50	Fruit and Dip		\$1.25
Ala Carte SM Pizza \$4	(THS)	Roll/Cornbread/bread			\$0.75	Ice Cup		\$0.25

## VISITORS

Tullahoma High School has a NO VISITOR POLICY. Because of the possibility of school and classroom disturbances, students are not allowed to have visitors during the school day. Any parent or other visitors on school business must check in at the visitors' entrance and be issued a pass. Any student-age visitor must have the express permission of the administration. Students are not permitted to have visitors during lunch. Unauthorized visitors at lunch and school activities are subject to trespassing violations.

## TECHNOLOGY

Each student will have access to a Chromebook for school use. Students who do not have access to an internet-connected device at home may be issued a school Chromebook for use at school and at home. Parents of students being issued school devices must sign the TCS Computer Use Agreement. This agreement must be signed and submitted when the Chromebook is issued. Additional rules governing Chromebooks and the school network are included in the agreement.

## SOCIAL MEDIA

Participation in activities, groups, and teams is a privilege at Tullahoma High School. Using social media by a student "unbecoming of a Wildcat" may result in discipline, including suspension or removal from the activity, group, leadership position, or team.

## COMPUTER NETWORK

- Computer software installed on computers at Tullahoma High School is either the property of Tullahoma High School or licensed by Tullahoma High School for educational use only. Software may not be copied or otherwise taken from the computers upon which it is installed.
- Students are forbidden to add, delete, or modify operating system elements or change any hardware or software setting.
- No software will be installed on the hard disk drive by a student. If the software is to be installed on the hard drive, only an official systems operator shall do it.
- Any illegal software found on the hard disk drive will be removed; violations may result in disciplinary actions by the school, and legal actions may be pursued at the discretion of the individual

software company.

- Repair costs resulting from deliberate damage to computer equipment by the student is the student's financial responsibility.
- There is no expectation of privacy for students who use school-purchased computer equipment or media.

Anyone violating this policy loses the right to use the network for the duration of his/her time at Tullahoma High School – No Exceptions.

## VIDEOS/PHOTOS

- Cameras, camera phones, and other electronic recording devices are prohibited in locker rooms at all times.
- Cameras, camera phones, and other electronic recording devices owned or operated by individuals may not be used to photograph, video, or record any student or staff without permission from the individual(s) being photographed, videoed, or recorded.
- Any student who records and/or disseminates in any manner an unauthorized or misrepresented photograph, video, or recording for the purpose of embarrassing, demeaning, or discrediting the reputation of any student or staff or that results in the embarrassment, demeaning, or discrediting of any student or staff, or results in any action or activity disruptive to the educational process shall be subject to disciplinary action up to and including suspension or expulsion at the discretion of the principal.

Any student violating this policy's restrictions may have the device confiscated and be subject to disciplinary action at the principal's discretion. Students who record fights or other student altercations may be subject to disciplinary action. This action may include out-of-school suspension. Local authorities may also be notified, in which case the device may be entered as evidence.

\*\*School security cameras are not included in this restriction. Any student violating this policy's restrictions may have the device confiscated and be subject to disciplinary action at the principal's discretion.

NOTE: The creation and distribution of nude photographs of minors (under 18) violates state and federal child pornography laws (even if the student possessing or distributing the material is also a minor.) Engaging in such activity can lead to serious legal and educational consequences. Cases, where sexually explicit media is acquired by making threats (extortion) or distributed with the intent to harm (revenge/cyberbullying), are considered a Category IV offense and will be dealt with accordingly.

## **Electronic games/CD/Tape/MP3 Players, Toys, Other Digital Music Players, Etc.**

Electronic games, CD/MP3 players, collectible cards, toys, etc., should not be brought to school. These items are high theft items and tend to cause distractions from the educational process. THS assumes no responsibility for the theft or damage to personal property. Use of these items in classrooms is prohibited unless it is an educational activity under the direct supervision of the classroom teacher. These devices are allowed in the hallway as long as it does not limit the student's ability to hear announcements or teacher directives. "One ear open" is good advice.

## TULLAHOMA CITY SCHOOLS CODE OF CONDUCT

The following levels of misbehavior and disciplinary procedures and options are standards designed to protect all educational community members in exercising their rights and duties and to maintain a safe learning environment where orderly learning is possible and encouraged. These misbehaviors apply to student conduct on school buses, on school property, and while students are on school-sponsored outings. Staff members shall ensure that disciplinary measures are implemented in a manner that:

- Balances accountability with an understanding of traumatic behavior;
- Teaches school and classroom rules while reinforcing that violent or abusive behavior is not allowed at school;
- Minimizes disruptions to education with an emphasis on positive behavioral supports and behavioral intervention plans;
- Creates consistent rules and consequences
- Models respectful, non-violent relationships.

**MISBEHAVIORS LEVEL I:** This level includes minor misbehavior on the part of the student, which impedes orderly classroom guidelines or interferes with the orderly operation of the school but can usually be handled by an individual staff member.

**MISBEHAVIORS LEVEL II:** This level includes misbehavior whose frequency or seriousness disrupts the school's learning climate. These misbehaviors do not represent a direct threat to the health and safety of others but have educational consequences severe enough to require corrective action on the part of administrative personnel.

**MISBEHAVIORS LEVEL III:** This level includes acts directed against persons or property whose consequences do not seriously endanger the health or safety of others in the school.

**MISBEHAVIORS LEVEL IV:** This level of misbehavior includes acts that result in violence to another person or property or threaten the safety of others in the school. These acts are so severe that they usually require administrative actions, which result in the immediate removal of the student from the school, the intervention of law enforcement authorities, and/or action by the Board.

If a student's action threatens the safety of others in the school, a teacher, principal, school employee, or school bus driver may use reasonable force when necessary to prevent bodily harm or death to another person.

## Tullahoma High School Common Expectations

	Classroom	Hallway	Bathroom	Cafeteria	Auditorium	Library	Extracurricular	Technology and Phones
<b>Be Respectful</b>	<p>Be on time</p> <p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p> <p>Respond to others respectfully</p>	<p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p> <p>Be mindful of others learning</p>	<p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p> <p>Allow others privacy</p> <p>Keep restroom clean</p>	<p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p> <p>Be kind and courteous to the cafeteria staff</p>	<p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p> <p>Follow directions</p> <p>Be respectful to presenters</p>	<p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p>	<p>Keep hands, feet, and objects to self</p> <p>Use appropriate language and voice level</p> <p>Allows others to listen and learn</p> <p>Listen to adults</p>	<p>Get permission before taking pictures and/or videos</p> <p>Put phones away in phone holders provided unless used for instruction</p>
<b>Be Responsible</b>	<p>Be on time</p> <p>Bring required materials</p> <p>Take care of personal needs before class</p> <p>Complete and turn in all assignments</p> <p>Be on time</p> <p>Follow all classroom procedures</p>	<p>Go directly to your destination</p> <p>Keep hallways and lockers clean and uncluttered</p> <p>Walk safely</p>	<p>Schedule bathroom breaks wisely</p> <p>Wash your hands</p>	<p>Clean up after yourself</p> <p>Keep food in the cafeteria</p> <p>Handle food as it was meant to be handled</p> <p>Walk quietly and orderly in line to and from the cafeteria</p>	<p>Enter quickly and quietly</p> <p>Clean up after yourself</p> <p>No food or drinks</p>	<p>Clean up after yourself</p> <p>Leave equipment the way you found it</p> <p>Use equipment with care</p>	<p>Exhibit an attitude that is a positive representation of the school</p> <p>Report problems to an adult</p> <p>Remember all school rules apply</p>	<p>Use equipment with care</p> <p>Keep up with your own technology</p> <p>Put phones away in phone holders provided unless used for instruction</p>
<b>Be Engaged</b>	<p>Ask for help when needed</p> <p>Share ideas and participate</p> <p>Follow all teacher directions</p> <p>Look at and listen to the speaker</p>	<p>Be mindful of others and their property</p> <p>Stop and listen during an announcement</p>	<p>Keep phones put away</p> <p>Use the bathroom quickly and return to class</p>	<p>Be aware of the time</p> <p>Listen and follow directions</p>	<p>Look at and listen to the speaker</p> <p>Sit in your assigned area</p> <p>Ask appropriate questions</p>	<p>Use technology for academic purposes</p> <p>Report inappropriate content</p>	<p>Participate</p> <p>Be aware of the rules and expectations of your environment</p> <p>Be aware of your surroundings</p>	<p>Put phones away in phone holders provided unless used for instruction</p> <p>Notify the teacher of emergency issues</p>

## **Tullahoma High School Student Dress Code**

Students shall dress and groom in a clean, neat, and modest manner so as not to distract or interfere with the school's operation. When a student is dressed in a manner that is likely to cause disruption or interference with the operation of the school or in a manner that violates the developed guidelines, the principal shall take appropriate action, which may include suspension.

### **The administration and teachers will determine the appropriateness of dress.**

- **Shirts:** Must be collared, crew neck, or V neck and opaque (not see-through), cover the abdomen, back, midriff, and cleavage, and have an over-the-shoulder area of 2 inches wide.
- **Shorts, skirts, and dresses:** Not to be shorter than the longest fingertip when arms are extended and down at the student's sides.
- **Holes, rips, tears, and slits in pants:** All holes above the fingertips must have cloth fabric covering the exposed skin.
- **Leggings, jeggings, and other athletic/compression-style pants or shorts:** May be worn with dress-code-compliant pants, shorts, skirts, or dresses. If worn with a T-shirt, the shirt must be no shorter than the knuckles of a closed-hand fist when arms are extended and down at the student's side.
- **"Sagging" pants:** Not allowed.
- **Pajamas/pajama pants:** Not allowed.
- **Sunglasses:** Not allowed except for health purposes. A doctor's note is required.
- **Headwear:** Hats/caps, hair picks, do-rags, stocking caps, shower caps, sleeping caps, bandanas, hair curlers, and the hood on hoodies or jackets are not allowed to be worn on the head in the school building. (caps may be worn in the shop areas only during shop class)
- **Footwear:** Must be safe and appropriate for indoor and outdoor activities. House shoes, bedroom slippers, and skate shoes are not allowed.
- Clothing underneath sheer or lace clothing must adhere to the dress code.
- Apparel considered unnecessarily concealing will not be allowed.
- Spiked accessories and long chains are prohibited during school or school functions.
- Students may not wear clothing that mentions drugs, vulgar/obscene/profane captions, tobacco, alcohol, or gang-affiliated. In addition, students may not wear anything deemed disruptive to the instructional environment at THS.

Parents will be notified if students are inappropriately dressed. Students will be required to change into proper clothing and will not be allowed to attend class if they are in violation of the dress code. A slide presentation of what may and may not be worn to school is available on the school website. If a parent is unable to be contacted or unable to bring clothing in a timely manner that meets the dress code, the student will wait in the In-School Suspension room until contact is made or clothing is delivered. The student must check out with the parent's permission to leave school to change clothing.

## **Tullahoma High School Cell Phone Policy**

Students are permitted to possess a cell phone during school hours with the following restrictions:

- Cell phones and other authorized electronic devices shall be in the “off” mode at all times and placed in an assigned cell phone pocket (provided by THS) while in a classroom during school hours.
- Cell phones or authorized electronic devices may be in the “on” mode and used during class changes and in authorized areas on school grounds before and after school and at lunch.
- Cell phones are to be silenced and put away during presentations and assemblies during school hours.

A teacher may grant permission for the use of these devices to assist with instruction in his/her classroom, and teachers are encouraged to integrate the devices into their coursework. The principal or his/her designee may also grant a student permission to use such a device at his/her discretion.

Unauthorized use or improper storage of a device may result in confiscation until such time as it may be released to the student's parents or guardian. A student in violation of this policy is subject to disciplinary action steps.

Note: The THS cell phone policy is a privilege designed to teach students proper cell phone etiquette. If the presence of cell phones becomes a distraction to the educational process, THS reserves the right to modify this policy as necessary and with proper notice.

## **Tullahoma High School Corrective Actions**

The following is not a complete list of possible infractions but should serve as a guide for the students, faculty/staff, parents, and administration of Tullahoma High School. The administration at Tullahoma High School reserves the right to administer any necessary discipline in accordance with school board policy.

**In-school suspension (ISS)** - Instances in which a student is temporarily removed from his or her regular classroom(s) for at least half a day but remains under the direct supervision of school personnel.

**Out-of-school suspension (OSS)** - Temporary, complete exclusion from school and activities. In other words, a student is banned from being on school property.

**Alternative Learning Center (ALC)** - Designed to educate students who have not been successful in regular schools, often because of behavior, disciplinary, and safety concerns. The student is also banned from all other school property while assigned to the Alternative School Program.

- A student will be assigned to the ALC Program for no less than 30 days, including 5 transition days.
- Transition days:
  - On Days 1 and 2, the student will meet with extra support services.
  - Day 3, the student will start the day in transition and will go to their 4th block class only.
  - Day 4, the student will start the day in transition and will go to their 3rd and 4th block classes only.
  - Day 5, the student will start the day in transition and will go to their 2nd, 3rd, and 4th block classes only.

<b>Insubordination (Not Doing Work)</b> <b>(Misbehavior Level I)</b>	<ul style="list-style-type: none"> <li>● The student will receive a ZERO for the assignment.</li> </ul>
<b>Insubordination (Class Disruption)</b> <b>(Misbehavior Level II)</b>	<ul style="list-style-type: none"> <li>● <b>The total starts over every 9 weeks.</b></li> <li>● 1st offense, the teacher gives a verbal warning.</li> <li>● 2nd offense = 1 day ISS.</li> <li>● 3rd offense = 2 days ISS.</li> <li>● 4th offense = 3 days ISS.</li> <li>● 5th offense = 1 day OSS, 3 day ISS.</li> <li>● 6th or more offenses = 2 days OSS, 3 days ISS</li> </ul>
<b>Dress Code</b> <b>(Misbehavior Level I)</b>	<ul style="list-style-type: none"> <li>● <b>The total starts over every 9 weeks.</b></li> <li>● 1st offense, the student will change clothes or be given a change of clothing (exchange cell phone)</li> <li>● 2nd offense = Same as above plus 1 day ISS.</li> <li>● 3rd offense = Same as above plus 2 days ISS.</li> <li>● 4th offense = Same as above plus 3 days ISS.</li> <li>● 5th or more offenses = 1 day OSS and 3 days ISS.</li> </ul>
<b>Abusive Language (Profanity)</b> <b>(Misbehavior Level I)</b>	<ul style="list-style-type: none"> <li>● <b>The total starts over every 9 weeks.</b></li> <li>● 1st offense, the teacher gives a verbal warning.</li> <li>● 2nd offense = 1 day ISS.</li> <li>● 3rd offense = 2 days ISS.</li> <li>● 4th offense = 3 days ISS.</li> <li>● 5th or more offenses = 1 day OSS, 3 day ISS.</li> </ul>
<b>**Classroom Tardiness</b> <b>(Misbehavior Level 1)</b>	<ul style="list-style-type: none"> <li>● <b>The total starts over every 9 weeks.</b></li> <li>● 3 tardies = 1 day ISS.</li> <li>● 6 tardies = 2 days ISS.</li> <li>● 9 tardies = 3 days ISS.</li> <li>● 12 or more tardies = 1 day OSS and 3 days ISS.</li> </ul>

<p><b>Cell Phone (Refusal of confiscation)</b>  <b>(Class Disruption)</b>  <b>(Misbehavior Level I)</b></p>	<ul style="list-style-type: none"> <li>● <b>The total starts over every 9 weeks.</b></li> <li>● 1st offense = 1 day ISS.</li> <li>● 2nd offense = 2 days ISS.</li> <li>● 3rd offense = 3 days ISS.</li> <li>● 4th offense = 1 day OSS, 3 day ISS.</li> <li>● 5th or more offenses = 2 days OSS, 3 days ISS</li> </ul>
<p><b>Out Of Assigned Area</b>  <b>(Misbehavior Level I)</b></p>	<ul style="list-style-type: none"> <li>● <b>The total starts over every 9 weeks.</b></li> <li>● 1st offense = 1 day ISS.</li> <li>● 2nd offense = 2 days ISS.</li> <li>● 3rd offense = 3 days ISS.</li> <li>● 4th offense = 1 day OSS, 3 days ISS</li> <li>● 5th offense = ALC referral for no less than 30 days.</li> </ul>
<p><b>Skipping Class</b>  <b>(Misbehavior Level 1)</b></p>	<ul style="list-style-type: none"> <li>● Administration and Attendance will verify the student is skipping.</li> <li>● 1st skip = 2 days ISS.</li> <li>● 2nd skip = 3 days ISS.</li> <li>● 3rd skip = 1 day OSS, 3 days ISS.</li> <li>● 4th skip = 2 days OSS, 3 days ISS</li> <li>● 5th skip = ALC referral for no less than 30 days.</li> </ul>
<p><b>Leaving Campus Without Permission</b>  <b>(Misbehavior Level I)</b></p>	<ul style="list-style-type: none"> <li>● Administration and Attendance will verify the student is skipping.</li> <li>● 1st offense = 3 days ISS.</li> <li>● 2nd offense = 1 day OSS and 3 days ISS.</li> <li>● 3rd offense = 2 days OSS, 3 days ISS.</li> <li>● 4th offense = 3 days OSS, 3 days ISS</li> <li>● 5th offense = ALC referral for no less than 30 days.</li> </ul>
<p><b>E-Cigarette (Vaping)</b></p>	<ul style="list-style-type: none"> <li>● <b>1st offense:</b> Citation provided to the student, parent, and juvenile court by the school. The court will send a letter to the parent with a fine between \$10.00-\$50.00 and/or up to 50 hours of service. THS will also assign the student to 3 days of ISS and require the student to complete the following vape course <a href="http://www.everfi.com/">http://www.everfi.com/</a> (note: the course MUST be completed outside of school and prior to the end of 3 days)</li> <li>● <b>2nd offense:</b> Citation provided to the student, parent, and juvenile court by the school. The court will send a letter to the parent with a fine between \$10.00-\$50.00 and/or up to 50 hours of service. THS will also assign the student to 5 days of ISS and require the student to complete the following vape course <a href="https://mededucation.stanford.edu/courses/vaping-prevention-a-self-paced-online-course-linear-version/">https://mededucation.stanford.edu/courses/vaping-prevention-a-self-paced-online-course-linear-version/</a> (note: the course MUST be completed outside of school and prior to the end of 5 days)</li> <li>● <b>3rd Offense:</b> School Resource Officer will file a petition with the juvenile court. The court will send a letter to the</li> </ul>

	<p>parent with a fine between \$10.00-\$50.00 and/or up to 50 hours of service. THS will assign the student to 3 days of OSS.</p> <ul style="list-style-type: none"> <li>● <b>4th Offense:</b> School Resource Officer will file a petition with the juvenile court. The court will send a letter to the parent with a fine between \$10.00-\$50.00 and/or up to 50 hours of service. THS will assign the student to 3 days of OSS.</li> <li>● <b>5th Offense:</b> School Resource Officer will file a petition with the juvenile court. The court will send a letter to the parent with a fine between \$10.00-\$50.00 and/or up to 50 hours of service. THS will assign the student to 5 days of OSS.</li> </ul>
<b>Fighting (Misbehavior Level III)</b>	<ul style="list-style-type: none"> <li>● 1st Offense <ul style="list-style-type: none"> <li>○ Possible court petition</li> <li>○ Students will do 3 days OSS, 3 days ISS,</li> </ul> </li> <li>● 2nd Offense <ul style="list-style-type: none"> <li>○ Possible court petition</li> <li>○ ALC referral for no less than 30 days</li> </ul> </li> </ul>
<b>Aggressive Physical Contact (Assault) (Misbehavior Level III)</b>	<ul style="list-style-type: none"> <li>● 1st Offense <ul style="list-style-type: none"> <li>○ Possible court petition</li> <li>○ Students will do 3 days OSS, 3 days ISS,</li> </ul> </li> <li>● 2nd Offense <ul style="list-style-type: none"> <li>○ Possible court petition</li> <li>○ ALC referral for no less than 30 days</li> </ul> </li> </ul>
<b>Zero Tolerance</b> <ul style="list-style-type: none"> <li>● Assault that results in bodily injury upon any teacher, principal, administrator, and any other employee of the school, or a school resource officer.</li> <li>● Aggravated assault</li> <li>● Possession of unauthorized substances (any controlled substance, controlled substance, or legend drug)</li> </ul>	<ul style="list-style-type: none"> <li>● Referral to the Director of Schools for placement in the Alternative School Program for up to 1 calendar year.</li> </ul>

**\*\*Classroom Tardies**

- When a student is tardy to 2nd, 3rd, or 4th block, a referral must be put in Skyward.
- When a student is tardy to 1st block, and you have seen the student walking the halls, a referral must be put in Skyward.
- When a student checks in late through Attendance, no referral is needed in Skyward.
- When a student checks in late through Attendance more than 3 times, notify the administration to investigate.

Excessive infractions or failure to comply with administrative intervention may result in immediate suspension, referral to the Alternative School, or intervention by the SRO.

**All discipline is up to the discretion of the administration.**

# EXHIBIT N



<b>Tullahoma City Board of Education</b>			
Monitoring: <b>Review: Annually, in March</b>	Descriptor Term: <b>Suspension</b>	Descriptor Code: <b>6.316</b>	Issued Date: <b>10/20/20</b>
		Rescinds: <b>6.316</b>	Issued: <b>02/24/14</b>

1 *General*

2 A principal may suspend a student from attendance in a specific class or school related activity without  
3 suspending the student from attendance at school. Based on the severity of the offense, a principal may  
4 suspend a student from attendance at school and all school activities.

5 Students may be suspended for good and sufficient reasons including, but not limited to:<sup>1</sup>

- 6 1. Willful and persistent violation of the rules of the school;
- 7 2. Immoral or disreputable conduct, including vulgar or profane language;
- 8 3. Violence or threatened violence against the person of any personnel attending or assigned to any  
9 school;
- 10 4. Willful or malicious damage to real or personal property of the school or the property of any  
11 person attending or assigned to the school;
- 12 5. Inciting, advising, or counseling of others to engage in any of the action that would justify  
13 suspension;
- 14 6. Marking, defacing, or destroying school property;
- 15 7. Possession of a pistol, gun, or firearm on school property;<sup>2</sup>
- 16 8. Possession of a knife or other weapons, as defined in state law, on school property;<sup>3</sup>
- 17 9. Assaulting a principal, teacher, school bus driver, or other school personnel with vulgar,  
18 obscene, or threatening language;
- 19 10. Unlawful use or possession of barbitol or legend drugs as defined in state law;<sup>4</sup>
- 20 11. Engaging in behavior which disrupts a class or school-sponsored activity;
- 21 12. Making a threat, including a false report, to use a bomb, dynamite, or any other deadly  
22 explosive or destructive device including chemical weapons on school property or at a school-  
23 sponsored event;
- 24 13. One (1) or more students initiating a physical attack on an individual student on school property  
25 or at a school activity, including travel to and from school;
- 26 14. Off-campus criminal behavior resulting in felony charges;

1 15. When behavior poses a danger to persons or property or disrupts the educational process; or

2 16. Any other conduct prejudicial to good order or discipline in any school.

3 Except in an emergency, a principal shall not suspend any student until that student has been advised  
4 of the nature of his/her misconduct, questioned about it, and allowed to give an explanation.

5 If, as a result of an investigation, a principal/designee finds that a student acted in self-defense under a  
6 reasonable belief that the student, or another to whom the student was coming to the defense of, may  
7 have been facing the threat of imminent danger of death or serious bodily injury, then the student may  
8 not face any disciplinary action.<sup>5</sup>

9 When a student is suspended, the principal shall notify the parent(s)/guardian(s) and the Director of  
10 Schools/designee of the following:

11 1. Student's suspension;

12  
13 2. Cause for the suspension; and

14  
15 3. Any conditions for readmission which may include a meeting of the parent(s)/guardian(s),  
16 student, and the principal.

17 If a student is suspended during the last ten (10) days of any term or semester, he/she shall be  
18 permitted to take such final examinations or submit such required work as necessary to complete the  
19 course of instruction for that semester, subject to conditions prescribed by the principal.<sup>6</sup>

#### 20 **IN-SCHOOL SUSPENSION**<sup>7</sup>

21 In-school suspension shall be offered to students as an alternative program (if applicable) to complete  
22 academic assignments and receive credit for work completed.

23 Students given an in-school suspension in excess of one (1) day from classes shall attend special  
24 classes attended only by students guilty of misconduct or be placed in an isolated area appropriate for  
25 study. Personnel responsible for in-school suspension shall ensure that each student is supervised at all  
26 times and has textbooks and classwork assignments from his/her regular teachers.

#### 27 **SUSPENSIONS LONGER THAN FIVE DAYS**<sup>8</sup>

28 If a suspension is longer than five (5) days, the principal shall develop and implement a plan for  
29 improving the student's behavior.

#### 30 **SUSPENSIONS LONGER THAN TEN DAYS**<sup>9</sup>

31 If the principal suspends a student for longer than ten (10) days, he/she shall immediately give written  
32 notice to the parent(s)/guardian(s) and the student of the right to appeal the decision. All appeals shall  
33 be filed within five (5) days of receipt of the notice. These appeals may be filed by the  
34 parent(s)/guardian(s), the student, or any person holding a teaching license who is employed by the  
35 school district if requested by the student.

- 1 The appeal from this decision shall be to the Disciplinary Hearing Authority appointed by the Board. If
- 2 a Disciplinary Hearing Authority has not been appointed, then the appeal shall be to the Board.

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Legal References

1. TCA 49-2-203(a)(7); TCA 49-6-3401(a)
2. TCA 39-17-1309(b)
3. TCA 39-17-1309
4. TCA 53-10-101; TCA 39-17-454
5. TCA 49-6-3401(i)
6. TCA 49-6-3401(d)
7. TCA 49-6-3401(b)(1)
8. TCA 49-6-3401(c)(3)
9. TCA 49-6-3401(a)-(c); *Goss v. Lopez*, 419 U.S. 565 (1975); 20 USCA § 1415

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Cross References

Traffic and Parking Controls 3.403  
Code of Conduct 6.300  
Procedural Due Process 6.302  
Interference/Disruption of School Activities 6.306  
Drug-Free Schools 6.307  
Bus Safety and Conduct 6.308  
Zero Tolerance Offenses 6.309  
Dress Code 6.310  
Student Disciplinary Hearing Authority 6.317  
Alternative Education 6.319

# EXHIBIT O

B

B [REDACTED] P [REDACTED]

[REDACTED]

Tullahoma, TN

Suspension(931) [REDACTED]

12th August, 2022

**Tullahoma High School**

927 North Jackson Street

Tullahoma, TN 37388

To all it may concern,

This letter is being sent in anticipation of litigation. You are hereby instructed to retain all documents and recordings currently in your possession that are related to the allegations that led Tullahoma High School to suspend [REDACTED] P [REDACTED] on August 10, 2022.

It is my understanding that you have accused my son of creating certain images—specifically, one image involving Principal Quick and Adolph Hitler, and another image involving Principal Quick and members of the Ku Klux Klan—and that this accusation is at least part of the basis for the suspension. These accusations are false. I [REDACTED] had never seen these images prior to you showing them to him on August 10, 2022; he did not create them, nor did he disseminate them. My understanding is that you accused I [REDACTED] of creating and/or disseminating these images without any actual evidence that he did so and with a reckless disregard for the truth of your allegations. I specifically demand that you retain all copies of communications you have had with whoever claimed that I [REDACTED] created these images, as I intend to pursue litigation against that person or persons as well as against you for baselessly perpetuating this falsehood against my son.

In regards to the remaining three images posted or reposted, he should be held entirely harmless. Just last year the U.S. Supreme Court's decision in *Mahanoy Area School District v. B.L. by and through Levy*, 141 S.Ct. 2038 (2021), reaffirmed that students do not leave their First



Def. TCS/000057

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Amendment rights at the schoolhouse gate. As the Supreme Court concluded in *Mahanoy Area School District*, what students choose to post on social media or to share among themselves outside of school hours is, frankly and *constitutionally*, none of the school's business. The school cannot punish students for expressing themselves, even if their expression happens to criticize, poke fun at, or otherwise irritate school officials. You have not identified any way in which [REDACTED]'s posts threatened or otherwise injured any other student, and of course you *cannot* do so because his posts had nothing to do with any other student. You also have not identified any way in which his posts disrupted learning-related activities—other than, of course, the disruption that you yourself caused with your efforts to punish [REDACTED] for expressing himself. In the absence of any evidence that [REDACTED]'s posts (as opposed to school officials' histrionics) caused any disruption of learning-related activities, the school has no legitimate basis for penalizing his free speech.

Therefore, I demand that you immediately rescind the suspension you imposed on [REDACTED]. I will also require a list of all persons to whom it has been stated or implied that he was responsible for the offensive images, or that his behavior was in any way improper.

Sincerely,

  
B [REDACTED] P [REDACTED]

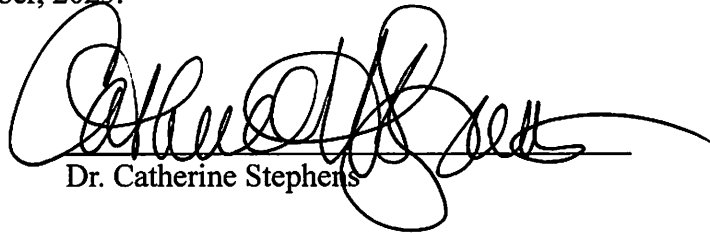
# EXHIBIT P



7. Plaintiff will not be suspended again for his involvement with the 5 images/memes at issue in this suit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19<sup>th</sup> day of October, 2023.



Dr. Catherine Stephens

# EXHIBIT Q



Wed, Jul 19 at 10:23 PM

**Important:**

**In THS handbook, per our board attorney delete the social media policy/wildcat policy from the handbook ASAP.**

On it

Thanks. 😊

# EXHIBIT R

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
WINCHESTER DIVISION**

<b>I.P., a minor, by and through B.P.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Case No. 4:23-cv-00026</b>
	)	<b>Judge Katherine A. Crytzer</b>
<b>TULLAHOMA CITY SCHOOLS, a</b>	)	<b>Magistrate Judge Susan K. Lee</b>
<b>political subdivision of the State of Tennessee;</b>	)	<b>JURY DEMANDED</b>
<b>JASON QUICK, in his individual capacity;</b>	)	
<b>and DERRICK CRUTCHFIELD, in his</b>	)	
<b>individual capacity,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT TULLAHOMA CITY SCHOOLS’  
OBJECTIONS AND RESPONSES TO  
PLAINTIFF’S FIRST SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant, Tullahoma City Schools, by and through undersigned counsel, respectfully submits these objections and responses to the Plaintiff’s First Set of Interrogatories (“Plaintiff’s First Interrogatories”).

**GENERAL OBJECTIONS**

Defendant’s responses to Plaintiff’s First Interrogatories are subject to the objections set forth below. Objections that may be particularly applicable to a given interrogatory or document request are referred to by the number of that discovery request. However, the failure specifically to list an objection should not be construed as a waiver of that objection. The following objections are expressly incorporated into Defendant’s responses to Plaintiff’s First Interrogatories:

1. Privileged Materials. Defendant objects to Plaintiff’s First Interrogatories that (1) inquire as to communications between attorney and client made in confidence for the purpose of facilitating the rendition of professional legal services, or that are otherwise protected by the

manner that is not protected speech or expression. It would be reasonable to deem the memes which were believed to have been posted or shared by I.P. and which were believed to have targeted then-Principal Jason Quick for humiliation and embarrassment in the eyes of students and/or others connected to the school to not be protected speech or expression and to have created disruption of the school environment. But the School Defendant has removed the policy and will not reinstate it while I.P. remains a student at the School, so whether the policy could be deemed legally overbroad or vague is a moot issue.

**Interrogatory No. 5**

Explain the process for how the Social Media Policy and Wildcat Policy were removed from the Tullahoma High School Student Handbook, including but not limited to, who the decision-makers were and the reason(s) for the decision.

**Answer:** The School Defendant objects to this interrogatory to the extent, if any, that it seeks information that is privileged under the attorney-client privilege or attorney work product doctrine. Subject to and without waiving such objection, the School Defendant states that, on the day that this lawsuit was filed, it came to the attention of the School's legal counsel, who discussed the two policies in question with Dr. Catherine Stephens, Director of Schools. Thereafter, Dr. Stephens sent a text message to Dr. Greg English, the current school principal, in the afternoon of July 19, 2023, directing him to delete these two policies from the handbook as soon as possible. He responded, "on it", and removed the policies that evening.

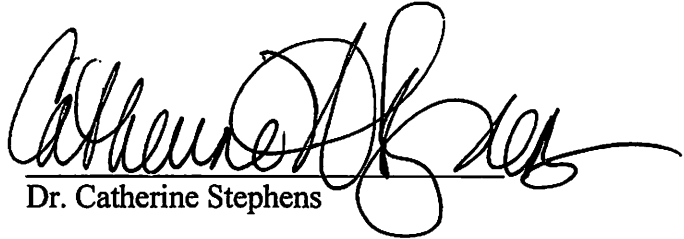
**Interrogatory No. 6**

Describe all communications and complaints the School District received regarding I.P.'s Posts.

**Answer:** This information is provided in the School Defendant's answer to the first amended complaint. In addition, pursuant to Rule 33(d), additional information responsive to this interrogatory is contained in and can be derived and ascertained from documents being produced by the School Defendant.

**VERIFICATION**

I, Dr. Catherine Stephens, Director of Schools of Tullahoma City Schools, verify and declare under penalty of perjury that the facts set forth in the foregoing Defendant's Responses to Plaintiff's First Set of Interrogatories are true and correct to the best of my knowledge and/or information available to me through district resources.

  
Dr. Catherine Stephens

12-1-2023  
Date

Respectfully submitted this 1st day of December, 2023.

/s/ Jerome D. Pinn  
Kenneth S. Williams (#010678)  
Jerome D. Pinn (#017848)  
Wimberly Lawson  
Wright Daves & Jones, PLLC  
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Telephone: (931) 372-9123  
[kwilliams@wimberlylawson.com](mailto:kwilliams@wimberlylawson.com)

*Attorneys for Defendant  
Tullahoma City Schools*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 1, 2023, a copy of the foregoing document has been served via E-mail to Plaintiff's counsel.

s/ Jerome D. Pinn  
Jerome D. Pinn