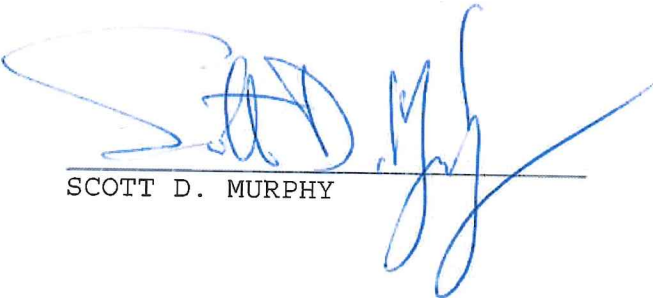


1 I, SCOTT D. MURPHY, do hereby certify  
 2 that I have read the above and foregoing deposition  
 3 and that the same is a true and accurate transcription  
 4 of my testimony, except for attached amendments, if  
 5 any.

6 Amendments attached (X) Yes ( ) No

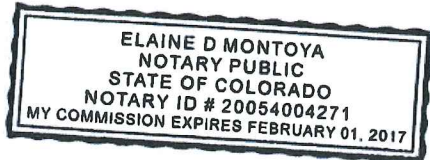
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 SCOTT D. MURPHY

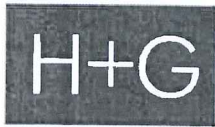
13 The signature above of SCOTT D. MURPHY  
 14 was subscribed and sworn to before me in the county of  
 15 Denver, state of Colorado,  
 16 this 29th day of December, 2015.

17  
 18  
 19

20 Elaine D. Montoya  
 Notary public  
 My Commission expires: 2-1-17



25 Michael Davis, et al. 11/11/15 (am)



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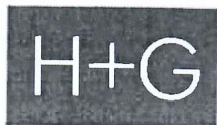
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## AMENDMENTS TO DEPOSITION

The deponent, Scott Murphy, wishes to make the following changes in the deposition:

Page	Line	Should Read	Reason
13	17	Replace "I don't remember her official title" with "Director of Alternative Education"	Reviewed records
14	14	Add the following: "LPS did not have a formal district policy about threat assessments."	Clarification
18	21 & 22	Replace "the" with "all" and strike "or at least one of them"	Correction
21	14	Replace "I don't recall a discussion around that" with "All principals and assistant principals, and mental health staff would be required to take training."	Recollection refreshed
25	7	Replace "what did get" with "whether it got"	Clarification
25	14	Replace "I" with "she"	Clarification
27	11	Replace "they" with "the Sheriff's investigators"	Clarification
29	10	Delete the word "media" and replace "sat" with "met"	Clarification
30	23	Replace "I don't recall" with "No, but I did not read the 4,000 papers and I did not know what the Sheriff had learned in his investigation."	Recollection refreshed
31	9	Add "I thought they knew."	More complete answer
32	6	Add "yes" at beginning of sentence	Clarification
32	10	Replace "now this is just a non-fish" with "I am just a non official"	Correction
33	10	Replace "I don't recall specifically" with "yes"	Correction
36	11	Add the following: "The District also established a District Review Team for all threat assessments."	Further recollection

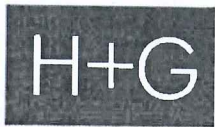


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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
40	2	Delete lines 2-5 and replace with "Yes. It's in Exhibit I"	Misunderstood question
42	5	Add the following: "but the fourth concrete step does not address interagency information sharing."	Clarification
43	9	Add "but LPS has paid half the cost for SROs at its schools for many years."	Clarification
55	2-7 & 11-13	Replace lines 2-7 and 11-13 with "after the shooting, the Sheriff and District Security decided that a Campus Supervisor would be stationed near the north doors which would be unlocked the entire school day. Allen Wrenching was no longer an issue."	Clarification
58	24 - 25	Replace lines 24-25 with "Probably sometime before 2006 which was my last year as Assistant Superintendent of Business Services."	Clarification
69	10-11	Delete lines 10 - 11 and replace with "School districts are required to randomly test school bus drivers for drugs and alcohol."	Clarification
86	19	Add the following: "There was also concern for the principal's safety."	Clarification
91	10	Add the following: "But I thought that they knew."	Clarification
92	12	Add the following: "except that the AHS security team was asked to watch Karl Pierson closely after that."	Clarification
105	7 & 9	Delete lines 7 & 9 and replace with "No, Bryan Jessie was an Assistant Principal."	Wrong answer Checked Ex. 2 & 3
108	1	Add the following: "in his decision about the gun-viewing."	Clarification
108	25	Replace "was" with "had been"	Wrong tense
116	9	Replace "two" with "too"	Wrong word
116	13	Replace "mess" with "very emotional"	Wrong word

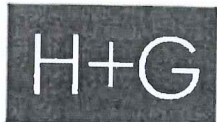


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## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
128	1 - 3	Delete lines 1 -3 and replace with: "No, they saw the incident and there were no documents pertaining to it."	Further reflection
130	9 - 10	Replace "as well as a violation" with "if FERPA is violated routinely"	Clarification
138	8	Add the following: "but the date of December 14 is obviously wrong, because that was a Saturday. The Sheriff had closed AHS as a crime scene and LPS personnel weren't allowed access to AHS until Sunday, December 15th. The conversations were probably on December 17th which is the date of the search warrant."	Clarification
142	10	Add the following: "My understanding is that Melissa Cooper, Nate Thompson and others found the Threat Assessment in a folder in Esther Song's office at Arapahoe High School on Sunday December 15. They took it back to the ESC it remained until it was given to the Sheriff's investigation on or about December 17."	Clarification
142	22 - 25	Delete lines 22 - 25 and replace with "Melissa Cooper and others went over to AHS, found the Threat Assessment in Esther Song's office and brought it back to the ESC on December 15."	Clarification
148	20	Add the following at the end: "been given to the Sheriff"	Clarification
149	17	Delete the words "or the behavior incident" and add the word "log"	Incorrect Answer
150	18 - 20	Delete lines 18 -20 and replace with "The Swomley incident is not reported in the contact log"	Wrong answer Reviewed Exhibit 24
153	7	Add the following: "My understanding is that the investigator already had the document."	Clarification
153	24	Add the following: "I thought it was"	Clarification
154	5	Replace "off with "on"	Wrong word
165	8	Add the following: "No one at LPS has told me that any of Pierson's teachers ever wrote up a referral on him."	Clarification



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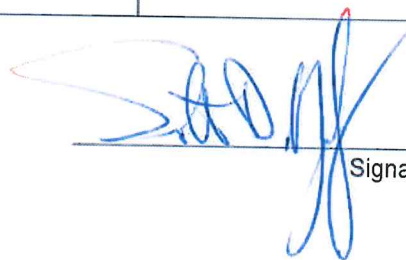
## AMENDMENTS TO DEPOSITION

Page	Line	Should Read	Reason
171	21 - 24	Delete lines 21 - 24 and replace with: "LPS could not order nor commit to interviews of its staff and students. The proposal seemed premature to me."	Clarification
172	1	Add the following: "although I also was very skeptical that the Piersons would voluntarily participate in this study without a waiver of liability."	More complete answer
172	12	Add the following: "LPS would not have had the authority to order its employees or students to participate."	More complete answer

Subscribed and sworn to before me

this 29<sup>th</sup> day of December, 20 15

Elaine D. Montoya  
Notary Public

  
\_\_\_\_\_  
Signature of Deponent

My Commission Expires: 2-1-17

ELAINE D MONTOYA NOTARY PUBLIC STATE OF COLORADO NOTARY ID # 20054004271 MY COMMISSION EXPIRES FEBRUARY 01, 2017
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DEC 29 2015

Karen Hardy &lt;karen@huntergeist.com&gt;

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**Deposition signature page and amendment sheet for Scott Murphy**

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Karen Hardy &lt;karen@huntergeist.com&gt;

Wed, Dec 30, 2015 at 8:08 AM

Draft To: Filing Department &lt;filing@huntergeist.com&gt;

----- Forwarded message -----

From: Elaine Montoya &lt;EMontoya@semplelaw.com&gt;

Date: Tue, Dec 29, 2015 at 4:54 PM

Subject: Deposition signature page and amendment sheet for Scott Murphy

To: "karen@huntergeist.com" &lt;karen@huntergeist.com&gt;

Cc: Steve Everall &lt;severall@semplelaw.com&gt;

Hi Karen,

Please see the attached executed signature page and amendment sheet for deponent Scott Murphy re the Arbitration of Michael and Desiree Davis and Littleton Public Schools.

Thank you,

Elaine Montoya

Office Manager/Paralegal

Semple, Farrington &amp; Everall, P.C.

1120 Lincoln Street, Suite 1308

Denver, Colorado 80203

Phone: (303) 595-0941

Fax: (303) 861-9608

[emontoya@semplelaw.com](mailto:emontoya@semplelaw.com)

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**2 attachments** **Signature Page - Murphy, Scott - (Executed) 20151229.pdf**  
43K **Amendments to Deposition - Murphy, Scott (Executed) 20152912.pdf**  
235K