

EXHIBIT 4



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Via Electronic Mail

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Re: Defendants' Request for the Deposition of Jane Doe in
Doe v. Lorena Independent School District and April Jewell

Dear Counsel;

We write with respect to Defendants' request for the deposition of Jane Doe. Nicolas Crenshaw sexually abused Jane when she was a pre-K student. Jane has been diagnosed with chronic post-traumatic stress disorder, and she suffers anxiety, nightmares, panic attacks, and stomach aches, among other things. Jane has been in therapy since 2021 and is now just ten years old.

When defense counsel stated they intended to depose Jane Doe, we asked – given Jane's age, the nature of the abuse, and the substantial risk of emotional harm and re-traumatization associated with requiring a young child to recount events related to sex abuse yet again in a litigation setting – that you articulate the purpose and necessity of the proposed deposition. We also requested that you specifically identify the following:

1. The probative value in this case of deposing a ten-year-old victim of child sex abuse;
2. The factual information Defendants believe can only be obtained through a direct deposition of this ten-year-old child;

3. Why the existing forensic interviews, investigative materials, medical/psychological records, law enforcement records, and other discovery produced to date are insufficient for those purposes; and
4. Whether Defendants contend there are disputed factual issues relating to the occurrence of the abuse itself, given Crenshaw's guilty plea and conviction.

We requested you provide that information to determine what probative value your deposition of Jane Doe, a child sex abuse victim, could possibly have in this case. You have not addressed those items in your response. Instead, Defendants maintain: "Your First Amended Complaint specifically seeks 'Past, present, and future physical and psychological pain, suffering, and impairment' on behalf of the student. As such, we are entitled to explore what that looks like directly with the student." As set forth below, Jane Doe's treating provider, a trained mental health professional, believes it is more probable than not that Jane does not have the cognitive ability to conceptualize answers to questions on those issues. Further, we will not be calling Jane Doe at trial. Her damages will be presented through her mental health treatment providers, her parents, and expert witnesses. Jane will not testify on issues you claim you are "entitled to explore," and we fail to see the probative value of you deposing a ten-year-old child who was sexually abused.

Jane Doe's mental health counselor, Kelsey D'Amore, has treated Jane for the last two years. Ms. D'Amore was presented with Defendants' deposition request, along with the limits you offered to impose on the deposition (i.e. a maximum of two hours, with only one examiner). Ms. D'Amore states that 10-year-old children like Jane do not have the cognitive ability to conceptualize damages related to the past, present, and future. Moreover, based on Ms. D'Amore's treatment of and experience with Jane, defense counsel asking Jane questions that she is not able to cognitively answer will likely put her into a dissociated state. Ms. D'Amore states that your requested deposition of Jane Doe will more likely than not trigger a resurgence of her PTSD symptoms in both frequency and severity, and cause her confusion, further traumatization, and irreparable harm.

Given the certainty of re-traumatizing Jane Doe in a deposition, the likelihood it would put her into a dissociative state, and because we are not going to call her at trial and will present her damages through other witnesses, we must oppose Defendants' request to depose Jane Doe.

Obviously, you will be free to explore the damages issues with other witnesses we intend to present at trial.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Monica Beck and Jeff Green", written in black ink.

Monica Beck and Jeff Green