

EXHIBIT 6

Discovery at Issue	Requesting Party's (Defendant LISD's) Position	Responding Party's (Plaintiff Doe's) Position
Plaintiff Jane Doe's deposition is at issue. Plaintiff has refused to appear for deposition, and, by correspondence dated June 12, 2026, Plaintiff's counsel expressly opposed both Defendant LISD's and Defendant Jewell's requests to depose Jane Doe.	Defendant LISD maintains that it is entitled to depose Jane Doe pursuant to Federal Rule of Civil Procedure 30, which authorizes a party to depose "any person, including a party, without leave of court." FRCP Rule 30. Plaintiff has not identified any categorical rule prohibiting the deposition of a minor plaintiff, nor does Rule 30 impose any age-based restriction that would exempt Jane Doe from ordinary discovery simply because she is a minor. Jane Doe is not merely a peripheral witness. She is the student on whose behalf Plaintiff seeks relief, and Plaintiff's First Amended Complaint specifically places Jane Doe's physical and psychological condition at issue by seeking damages for "past, present, and future physical and psychological pain, suffering, and impairment." Those claimed damages necessarily concern Jane Doe's own experiences, symptoms, alleged injuries, limitations, and present condition. Defendant is therefore entitled to explore the nature, extent, duration, and basis of those alleged injuries directly with Jane Doe. Plaintiff cannot affirmatively seek damages based on Jane Doe's physical	Jane Doe has not "refused to appear for deposition," as stated by Defendants and which incorrectly suggests she did not appear for a noticed deposition. This is untrue. Plaintiff provided Defendants a sworn declaration from Jane's treating therapist, who described in specific detail how and why Defendants' proposed deposition will cause Jane "irreparable harm." Plaintiff objected to the deposition of Jane and informed Defendants she will move for a protective order, pursuant to Rule 26. Jane was sexually abused by a substitute teacher during the 2020-2021 academic year, when she was a five-year-old student. Jane is now ten years old and suffers chronic PTSD and anxiety. She has been in psychological treatment since August 2021 and remains under the care of her current therapist, Kesley D'Amore. Defendants want to depose Jane on her "[p]ast, present, and future physical and psychological pain, suffering and impairment" and "explore what that looks like directly with the student." Plaintiff informed Defendants that Jane's injuries will be proved through her parents,

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	and psychological pain, suffering, and impairment while simultaneously refusing to allow Defendant any meaningful opportunity to examine Jane Doe regarding those same claimed injuries. The requested deposition is also relevant to Defendant's ability to evaluate the allegations, test the claimed damages, prepare defenses, and assess the evidence Plaintiff intends to rely upon. A deposition allows Defendant to determine what Jane Doe attributes to the alleged events, what symptoms or impairments she claims to have experienced, whether those alleged conditions continue, and whether there are facts bearing on causation, damages, credibility, or the scope of claimed relief. These issues go directly to Plaintiff's claims and requested damages. Courts within the Fifth Circuit have recognized that defendants are entitled to depose minor plaintiffs, even in cases involving sensitive allegations. In <i>Williams ex rel. Williams v. Greenlee</i>, 210 F.R.D. 577 (2002), which involved a sixteen-year-old plaintiff alleging sexual assault by a juvenile detention officer, the court	treatment providers, and expert witnesses, and they will not call Jane at trial. Notably, at this late stage in the discovery period, Defendants have stated no intention of deposing Jane's treatment providers. Plaintiff also provided Defendants a detailed declaration from Jane's therapist, Ms. D'Amore, in which she states that Jane, due to her age and trauma, lacks the cognitive ability to answer questions about her past, present, and future injuries. Ms. D'Amore also states the deposition, even if limited to two hours and with one examiner, as Defendants propose, will trigger a resurgence in the frequency and severity of Jane's PTSD symptoms, place her back into a dissociated or "frozen" state, and cause Jane "irreparable harm." Defendants have not refuted, and cannot refute, Ms. D'Amore's opinions that are based on her education, professional training and experience, and personal treatment of Jane. Pursuant to Fifth Circuit precedent and district court standards, there is good cause for a protective order prohibiting the deposition of Jane. <i>See Salter v. Upjohn</i>

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	stated plainly that defendants were entitled to depose the minor victim and plaintiff in the lawsuit. Similarly, in <i>Doe v. Beaumont Independent School District</i>, 615 F.Supp.3d 471 (2022), the court rejected efforts by minor plaintiffs to broadly restrict the scope of their depositions, explaining that even in the face of troubling allegations of sexual misconduct, notions of fair play require that a defendant have the opportunity to test the information through discovery. Defendant does not seek an unrestricted or unduly burdensome deposition. Rather, Defendant has proposed substantial protective measures designed to balance Jane Doe's status as a minor with Defendant's right to obtain relevant discovery. Defendant has agreed to limit the deposition to two hours, to permit only one attorney to conduct the questioning, to allow Jane Doe's parents and therapist to be present, and to implement other reasonable safeguards to minimize any burden on the student. These proposed conditions directly address Plaintiff's stated concerns while preserving Defendant's right to obtain discovery that	<i>Co.</i>, 593 F.2d 649 (5th Cir. 1979); <i>Bucher v. Richardson Hosp. Auth.</i>, 160 F.R.D. 88, 92 (N.D. Tex. 1994). Plaintiff will submit a fully briefed and supported motion for a protective order barring the deposition of Jane Doe, which will distinguish the cases cited by Defendants and attach Ms. D'Amore's declaration. It would be unjust to constrain Plaintiff to the 500-word limitation applicable to this submission on an issue that implicates certain grave harm to a child, and the Court will also benefit from full briefing and an evidentiary record on the dispute. (Indeed, Defendants greatly exceeded their word limit in this submission.) <u>Requested Relief:</u> The Court denies Defendants' request that Jane Doe be compelled to attend any deposition. The Court grants Plaintiff's motion for a protective order, which Plaintiff will file as a fully briefed and supported motion.

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	is central to the claims and damages in this case. The safeguards proposed by Defendant are consistent with the approach taken by courts in the Fifth Circuit when addressing depositions of minor plaintiffs. In <i>Bucher v. Richardson Hosp. Authority</i>, 160 F.R.D. 88 (1994), the court declined to prohibit the deposition of a minor plaintiff but imposed procedural protections, including permitting the minor's mother and therapist to be present, limiting the subject matter to facts directly related to liability and damages, and limiting the deposition to two hours of direct examination, with cross-examination not to exceed thirty minutes. <i>Bucher</i> demonstrates that the appropriate remedy for legitimate concerns about a minor's deposition is not a categorical prohibition, but a tailored set of safeguards that allow discovery to proceed in a controlled and protective manner. <i>Bucher</i>, 160 F.R.D. 88 (1994). That is precisely what Defendant has proposed here. Defendant's requested deposition is limited, targeted, and directly tied to the claims and damages asserted in Plaintiff's First Amended Complaint.	

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	Plaintiff's complete refusal to allow Jane Doe to be deposed goes far beyond any reasonable protective measure and would unfairly prevent Defendant from obtaining discovery concerning the very injuries for which Plaintiff seeks recovery. The Court should therefore compel Plaintiff to produce Jane Doe for deposition, subject to the reasonable safeguards proposed by Defendant. <u>Requested Relief:</u> This Court compels Plaintiff to produce Jane Doe for deposition at a mutually agreeable date and time, subject to the reasonable protective measures proposed by Defendant, including a two-hour time limitation, examination by only one attorney, and the presence of Jane Doe's parents and therapist. Defendant further requests any other relief to which they may be justly entitled.	