

STATE OF NEW HAMPSHIRE  
Superior Court  
Rockingham, ss.  
Case No. 215-2022-CV-00167

*Steven Rand et al.,*

Plaintiffs,

v.

*The State of New Hampshire,*

Defendant.

**PLAINTIFFS' WITNESS LIST**

**September 4, 2024**

Plaintiffs, through counsel, submit the below list of witnesses at the trial in this matter scheduled for September 30, 2024.

**Fact Witnesses:**

1. Annette Blake  
Belmont Middle School  
38 School Street  
Belmont, N.H. 03220  
Topic(s): Sufficiency of Base Adequacy and Differentiated Aid.
2. Jennifer Dolloff  
17 Lorden Lane  
Brookline, N.H., 03033  
Topic(s): Sufficiency of Differentiated Aid and direct experiences with the provision of Special Education and Related Services.
3. Kenneth Dassau  
142 Flagg Rd  
Marlow, N.H. 03456

Topic(s): Sufficiency of Differentiated Aid and direct experiences with the provision of Special Education and Related Services.

4. Donna Magoon  
275 Concord Rd  
Northfield, N.H. 03276-4314  
Topic(s): Sufficiency of Differentiated Aid.
5. Teresa Taylor  
SAU 70  
41 Lebanon Street, Suite 2  
Hanover, N.H. 03755  
Topic(s): Sufficiency of Differentiated Aid.
6. Lisa Witte  
112 Old Street Rd  
Peterborough, N.H. 03458  
Topic(s): Sufficiency of Differentiated Aid.
7. Lindsey M. Stepp  
Commissioner  
New Hampshire Department of Revenue Administration  
109 Pleasant Street  
Concord, N.H. 03302  
Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024 and accuracy/reliability of state data.
8. Bruce Kneuer  
Municipal Bureau Supervisor  
New Hampshire Department of Revenue Administration  
109 Pleasant Street  
Concord, N.H. 03302  
Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024 and accuracy/reliability of state data.
9. NHDRA Custodian of Records<sup>1</sup>  
State of New Hampshire, Department of Revenue Administration  
109 Pleasant Street  
Concord, N.H., 03302

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<sup>1</sup> Plaintiffs are currently waiting for the State to identify the individual(s) who will serve as the custodian of records for the New Hampshire Department of Revenue of Administration. Plaintiffs will amend and file a witness list with this information as soon as they receive it from the State.

Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024.

10. Mark Manganiello

Bureau Administrator  
New Hampshire Department of Education  
25 Hall Street  
Concord, N.H. 03301

Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024 and accuracy/reliability of state data

11. Rebecca Fredette

State Director of Special Education  
New Hampshire Department of Education  
25 Hall Street  
Concord, N.H. 03301

Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024 and accuracy/reliability of state data.

12. Frank Edelblut

Commissioner  
New Hampshire Department of Education  
25 Hall Street  
Concord, N.H. 03301

Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024.

13. Caitlin Davis

Division Director, Education Analytics and Resources  
New Hampshire Department of Education  
25 Hall Street  
Concord, N.H. 03301

Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024 and accuracy/reliability of state data.

14. NHDOE Custodian of Records<sup>2</sup>

State of New Hampshire, Department of Education  
25 Hall Street  
Concord, N.H. 03301

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<sup>2</sup> Plaintiffs are currently waiting for the State to identify the individual(s) who will serve as the custodian of records for the New Hampshire Department of Education. Plaintiffs will amend and file a witness list with this information as soon as they receive it from the State.

Topic(s): Authentication of the documents and state public data identified in Plaintiffs' Trial Subpoena and Subpoena Duces Tecum dated July 30, 2024.

15. James Lewis  
Plaintiff  
70 Turnberry Lane  
Hopkinton, N.H. 03229  
Topic(s): Personal Background and Tax Burden

16. Steven Rand  
Plaintiff  
120 Highland Street  
Plymouth, N.H. 03264  
Topic(s): Personal Background and Tax Burden

17. Robert Gabrielli  
Plaintiff  
40 Via Tranquilla  
Concord, N.H. 03301  
Topic(s): Personal Background and Tax Burden

18. Jessica Wheeler Russell  
Plaintiff  
76 Manor Road  
Concord, N.H. 03303  
Topic(s): Personal Background and Tax Burden

19. Adam Russell  
Plaintiff  
76 Manor Road  
Concord, N.H. 03303  
Topic(s): Personal Background and Tax Burden

20. John Lunn  
Plaintiff  
23 Fletcher Road  
Newport, N.H. 03754  
Topic(s): Personal Background and Tax Burden

Expert Witnesses:<sup>3</sup>

1. John Freeman  
135 Beaver Road  
Strafford, N.H. 03884

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<sup>3</sup> For each of the foregoing three witnesses, Plaintiffs have complied with the expert disclosure required by RSA 516:29-b.

Topic(s): Sufficiency of Base Adequacy and Differentiated Aid

2. Corinne Cascadden  
1787 Hutchins Street  
Berlin, N.H. 03570

Topic(s): Sufficiency of Base Adequacy and Differentiated Aid

3. Kevin Clougherty  
266 Blevens Dr.  
Manchester, N.H. 03104

Topic(s): Sufficiency of Base Adequacy and Differentiated Aid as they impact tax rates and the Administration of the DRA, to include equalized taxation and accuracy/reliability of state data.

Plaintiffs reserve the right to call any witness identified on Defendant's witness list and any other witness as may be necessary or appropriate to authenticate a document, lay a business records foundation, or introduce rebuttal and/or impeachment evidence, or for any other permissible purposes. Plaintiffs reserve the right to amend this list at any time before trial.

Dated: September 3, 2024  
Concord, New Hampshire

Respectfully submitted,

*Counsel for Plaintiffs*

*/s/ John E. Tobin, Jr.*

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been served on counsel for Defendant, State of New Hampshire, on this 3rd day of September, 2024, by way of the Court's electronic filing and service system.

/s/ John E. Tobin, Jr.  
John E. Tobin, Jr., NH Bar No. 2556