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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

PLANS, Inc.,	)	Case No.: CIV. S-98-0266 FCD PAN
	)	
Plaintiff,	)	Date: January 14, 2005
	)	Time: 3:30 p.m.
vs.	)	Place: Courtroom 25
	)	
SACRAMENTO CITY UNIFIED SCHOOL	)	
DISTRICT, TWIN RIDGES ELEMENTARY	)	
SCHOOL DISTRICT, DOES 1-100,	)	JOINT FINAL PRETRIAL CONFERENCE
Defendant	)	STATEMENT
	)	
	)	

Defendants SACRAMENTO CITY UNIFIED SCHOOL DISTRICT (hereinafter
“SCUSD” or “Defendant”) and TWIN RIDGES ELEMENTARY SCHOOL DISTRICT (hereinafter
“TRESA” or “Defendant”) (hereinafter collectively “School Districts” or “Defendants”) and Plaintiff,

1 PLANS, Inc. (hereinafter “PLANS” or “Plaintiff”), hereby file their Joint Final Pretrial Conference
2 Statement.

3 **1. JURISDICTION - VENUE:**

4 Jurisdiction is predicated upon 28 United States Code section 1331 and 28 United
5 States Code section 1343. Defendants contend Plaintiff does not have proper standing before this court.
6 Plaintiff contends standing has been established, as a matter of law, by this court.

7 **2. JURY - NON-JURY:**

8 Trial shall be to the court without a jury.

9 **3. UNDISPUTED FACTS:**

10 **Defendants contend the following are the undisputed facts in this case as**
11 **previously outlined by the court’s final pretrial order:**

12 a. A Waldorf method used by the schools is that the same teacher progresses
13 through each grade with his or her class, through the eighth grade.

14 b. Austrian-born Rudolf Steiner founded Waldorf education in 1919 when he
15 created a school in Germany for the children of the Waldorf-Astoria cigarette factory workers.

16 c. Oak Ridge began operating as a Waldorf methods magnet school in
17 September 1995.

18 d. Rudolf Steiner College, a school for teacher training in Waldorf education,
19 submitted a proposal for the training of the Oak Ridge teachers in the use of Waldorf methods in a
20 public school setting. Betty Staley, the Dean of Faculty, created the teacher training program for the
21 Oak Ridge teachers in 1995. The teachers began their teacher training through Rudolf Steiner College
22 in spring of 1996.

23 e. Just prior to the 1997-1998 school year, the Waldorf Methods Magnet
24 School moved from Oak Ridge School and became the John Morse Waldorf Methods Magnet School
25 (hereinafter “John Morse”).

26 f. In August 1994, Twin Ridges agreed to sponsor a Waldorf methods
27 charter school.

28 g. The Twin Ridges Alternative Charter School opened in September 1994.

1 h. The following year, the Twin Ridges Alternative Charter School moved
2 and became the Yuba River Charter School (hereinafter “Yuba River”).

3 i. Both schools currently operate as public schools using Waldorf methods in
4 the classroom.

5 **Plaintiff contends the following are the undisputed facts in this case:**

6 j. Whether SCUSD or TRESA public officials supervise public employees
7 on public property.

8 k. Waldorf education involves alternative teaching methods, including the
9 integration of arts into all subjects, so as to creatively teach children the substantive concepts.

10 l. Storytelling, reading of myths and legends, learning handcrafts, cooking,
11 gardening, painting, music, and movement are also part of the Waldorf method.

12 m. Before founding Waldorf education, Steiner formulated a “spiritual
13 science” known as “anthroposophy.” Literally translated from its Greek origin, “anthroposophy” means
14 “knowledge of the human being.”

15 n. Following SCUSD’s 1993 voluntary desegregation plan, one of SCUSD’s
16 schools, Oak Ridge School [now John Morse], chose Waldorf as its magnet focus.

17 o. In April 1995 the SCUSD School Board approved Oak Ridge’s magnet
18 focus. In September 1995 Oak Ridge began operating as a Waldorf methods magnet school.

19 p. In 1995, Rudolph Steiner College proposed training Oak Ridge teachers in
20 the use of Waldorf methods in public schools. In February 1995, the SCUSD School Board accepted
21 Rudolph Steiner College’s proposal to train Oak Ridge teachers in Waldorf methods. The teachers at
22 John Morse receive training from Rudolph Steiner College, a teachers’ college specializing in Waldorf
23 educational methods.

24 q. During the 1997-98 school year, John Morse received public funding,
25 including magnet funds in the amount of \$188,580.

26 r. PLANS challenges the Waldorf school curriculum as a whole, and has
27 shown that a measurable amount of public funds support the Waldorf schools.
28

1 s. After a private Waldorf school near Nevada City closed, Waldorf parents
2 in the area investigated founding a charter school that would use Waldorf methods.

3 t. As a charter school, Yuba River is largely publicly funded.

4 u. Students learning under the Waldorf method begin each school day with a
5 two-hour main lesson, learning subjects in intensive three- to four-week blocks.

6 v. There are over 60,000 children in over 700 Waldorf schools throughout
7 the world.

8 w. Two religious festivals have taken place as part of the Waldorf education
9 at Twin Ridges.

10 x. SCUD's teachers receive training in Anthroposophy.

11 y. TRESA sought and employed teachers with Anthroposophical training.

12 z. State funds are expended in implementing the Waldorf teaching method.

13 aa. The Waldorf education methodology is directed by and ground in
14 assumptions about learning and child development that can only be understood in reference to
15 Anthroposophy.

16 **4. DISPUTED FACTUAL ISSUES:**

17 The parties agree that this case involves issues of law, and/or mixed questions of
18 law and fact, in constitutional adjudication.

19 **Defendants contend the following are disputed issues as previously outlined by the**
20 **court's final pretrial order:**

21 1. Whether anthroposophy is a religion.

22 A. Whether anthroposophy is a system of belief and worship of a superhuman
23 controlling power involving a code of ethics and philosophy requiring obedience thereto.

24 B. Whether anthroposophy addresses fundamental and ultimate questions
25 having to do with "deep and imponderable matters."

26 C. Whether anthroposophy is "comprehensive in nature."

27 D. Whether anthroposophy can be recognized by formal and external signs
28 such as formal services, ceremonial functions, the existence of clergy, structure and organization, efforts

1 at propagation, observance of holidays and other similar manifestations associated with the traditional
2 religions.

3 2. Whether the Waldorf inspired methodology employed by John Morse advances
4 and promotes anthroposophy.

5 A. What are the current curricular and extra-curricular activities at John
6 Morse.

7 B. Whether John Morse curricular and extra-curricular activities fit within
8 accepted teaching strategies and local, state, or federal instructional guidelines.

9 C. What are the governance and accountability systems in effect for John
10 Morse.

11 D. What are the operational and personnel systems in effect for John Morse.

12 3. Whether the Waldorf inspired methodology employed by Yuba River advances
13 and promotes anthroposophy.

14 A. What are the current curricular and extra-curricular activities at Yuba
15 River.

16 B. Whether Yuba River curricular and extra-curricular activities fit within
17 accepted teaching strategies and local, state, or federal instructional guidelines.

18 C. What is the governance and accountability system in effect for Yuba
19 River.

20 D. What is the operational and personnel system in effect for Yuba River.

21 4. Whether any religious organization is benefitted by the use of Waldorf inspired
22 methodology at John Morse.

23 5. Whether SCUSD, due to the operation of John Morse, pays from public funds any
24 benefit or provides aid to any religious organization, and if so, what is the nature of such benefit or aid.

25 6. Whether due to the operation of John Morse there is a current relationship
26 between SCUSD and any religious organization.

27 7. Whether any religious organization is benefitted by the use of Waldorf inspired
28 methodology at Yuba River.

1 8. Whether TRESA, due to the operation of Yuba River, pays from public funds any
2 benefit or provides aid to any religious organization, and if so, what is the nature of such benefit or aid.

3 9. Whether due to the operation of Yuba River there is a current relationship
4 between TRESA and any religious organization.

5 10. Whether SCUSD public officials supervise public employees on public property.

6 11. Whether TRESA public officials supervise public employees on public property.

7 12. Whether any religious organization is benefitted by the use of Waldorf inspired
8 methodology at John Morse.

9 13. Whether SCUSD, due to the operation of John Morse, pays from public funds any
10 benefit or provides aid to any religious organization, and if so, what is the nature of such benefit or aid.

11 14. Whether due to the operation of John Morse there is a current relationship
12 between SCUSD and any religious organization.

13 15. Whether any religious organization is benefitted by the use of Waldorf inspired
14 methodology at Yuba River.

15 16. Whether TRESA, due to the operation of Yuba River, pays from public funds any
16 benefit or provides aid to any religious organization, and if so, what is the nature of such benefit or aid.

17 17. Whether due to the operation of Yuba River there is a current relationship
18 between TRESA and any religious organization.

19 **Plaintiff contends the following are disputed issues in this case:**

20 18. Whether anthroposophy is a religion.

21 A. Whether anthroposophy addresses fundamental and ultimate questions
22 having to do with “deep and imponderable matters.”

23 B. Whether anthroposophy is “comprehensive in nature.”

24 C. Whether anthroposophy can be recognized by formal and external signs
25 such as formal services, ceremonial functions, the existence of clergy, structure and organization, efforts
26 at propagation, observance of holidays and other similar manifestations associated with the traditional
27 religions.

28 D. Whether anthroposophy currently has adherents.

1 19. Whether any religion is benefitted by the use of Waldorf inspired methodology at
2 defendant(s)' schools.

3 20. Whether defendant(s) pay from public funds any benefit or provides aid to any
4 religion, and if so, what is the nature of such benefit or aid.

5 21. Whether public funding of Waldorf education has the unintended consequence of
6 advancing Anthroposophy.

7 22. What degree of entanglement between church and state is generated by Waldorf
8 education.

9 23. Whether the Waldorf teaching method and Anthroposophy are in fact inseparable
10 in theory and as practiced by Defendants resulting in excessive governmental entanglement with
11 religion.

12 24. Whether state monitoring of the Waldorf education will be necessary to ensure
13 that no violations occur.

14 **5. DISPUTED EVIDENTIARY ISSUES:**

15 Defendants filed ten (10) in limine motions which were heard on April 11, 2001.
16 The motions were either ruled on or decision reserved pending trial. Defendants intend to renew the in
17 limine motions where judgment was reserved. The motions which were ruled upon are law of the case.

18 Defendants request the opportunity to file further in limine motions to limit or
19 exclude witnesses or evidence which it believes to be inadmissible based on the most recent round of
20 discovery.

21 Defendants' Daubert/Khumo motions were also heard in April 2001 regarding
22 expert witnesses. All of Plaintiff's expert witnesses were excluded or withdrawn, with the exception of
23 Dr. James Morton. The court ruled that Plaintiff could introduce limited testimony by Dr. Morton.

24 Plaintiffs reserve the right to file further in limine motions which it believes is
25 required based on the most recent round of discovery.

26 **6. SPECIAL FACTUAL INFORMATION IN CERTAIN ACTIONS:**

27 Not applicable.

28 **7. RELIEF SOUGHT:**

1 Plaintiff has not requested damages. Plaintiff seeks a permanent injunction
2 “enjoining defendants from operating taxpayer funded Waldorf schools, or other schools that similarly
3 violate . . . [the federal and state constitution].” Additionally, Plaintiff seeks a declaration that
4 Defendants’ alleged operation of “Waldorf schools” violates both the state and federal constitutions.
5 Finally, Plaintiff seeks attorneys fees and costs pursuant to 42 United States Code section 1988.

6 Defendants deny that they are operating “Waldorf schools.” Defendants contend that
7 Plaintiff’s focus upon two schools (Twin Ridges Alternative Charter School and Oak Ridge Waldorf
8 Methods Magnet School) no longer in operation improperly seeks retroactive injunctive and declaratory
9 relief. See Quern v. Jordan, 440 U.S. 332 (1979) (no retrospective relief allowed). Defendants also
10 contest Plaintiff’s demand for overbroad injunctive relief to entirely shut down all Waldorf-inspired
11 public schools in current operation. If any particular aspect of the Defendants’ current programs or
12 activities is found by declaratory judgment by this court to rise to the level of a constitutional violation,
13 that aspect can be remedied. The Defendants can promptly bring any school into compliance with the
14 court’s declaration.

15 **8. POINTS OF LAW:**

16 The parties will brief the following as previously outlined in the court’s final
17 pretrial order:

18 **General**

19 1. Whether anthroposophy is a religion for Establishment Clause purposes
20 under current United States Supreme Court and Ninth Circuit standards.

21 2. Whether SCUSD advances anthroposophy through Waldorf inspired
22 methodology in violation of Establishment Clause.

23 3. Whether TRESA advances anthroposophy through the Waldorf inspired
24 methodology in violation of Establishment Clause.

25 4. Whether SCUSD advances anthroposophy through the Waldorf inspired
26 methodology in violation of Article XVI Section 5 of California Constitution.

27 5. Whether TRESA advances anthroposophy through the Waldorf inspired
28 methodology in violation of Article XVI Section 5 of California Constitution.

Endorsement:

6. Whether an objective observer in the position of an elementary school student would perceive a message of endorsement of anthroposophy in the use of Waldorf education methods at defendant(s)' schools.

7. Whether mere consistency with, or resemblance to, a religious practice has the primary effect of endorsing religion.

8. Whether the Waldorf method program at defendant(s); school primarily advances the previously adjudicated secular purpose of educational innovation and desegregation through a magnet school.

"Excessive Entanglement" Test:

9. Whether public officials' supervision of public employees using Waldorf methods creates excessive entanglement between religion and state.

California Constitution:

10. Whether Defendants violate Article I, section 4, Article XVI, section 5, or Article IX, section 8 of the California Constitution.

Relief:

24. Whether the relief requested by Plaintiff is necessary and proper in the circumstances as presented at trial.

9. ABANDONED ISSUES:

None.

10. WITNESSES:

See Plaintiff's witness list attached hereto as Attachment A.

See Defendants' witness list attached hereto as Attachment B.

11. EXHIBITS - SCHEDULES AND SUMMARIES:

See Plaintiff's exhibit list attached hereto as Attachment C.

See Defendants' exhibit list attached hereto as Attachment D.

12. DISCOVERY DOCUMENTS:

1 The Defendants intend to offer the following responses to discovery at trial for
2 purposes of rebuttal and/or cross-examination:

- 3 a. PLANS' Response to Interrogatories propounded by SCUSD, dated
4 September 9, 1998;
- 5 b. PLANS' Response to Interrogatories propounded by TRESA, dated
6 September 9, 1998;
- 7 c. PLANS' Response to Interrogatories of SCUSD, Set No. Two, dated
8 March 4, 1999;
- 9 d. PLANS' Answer to Special Interrogatories propounded by Defendants,
10 Set No. Three, dated January 15, 2004;
- 11 e. PLANS' Response to Request for Admissions propounded by Defendants,
12 Set No. One, dated January 15, 2004;
- 13 f. PLANS' Supplemental Answer to Special Interrogatories propounded by
14 Defendants, Set No. Three, dated February 22, 2004;
- 15 g. PLANS' Second Supplemental Answer to Special Interrogatories
16 propounded by Defendants, Set No. Three, dated March 31, 2004;
- 17 h. PLANS' Response to Request for Production of Documents propounded
18 by Defendants, Set No. Two, dated March 31, 2004;
- 19 i. PLANS' Supplemental Response to Request for Admissions propounded
20 by Defendants, Set No. One, dated March 31, 2004.

21 Plaintiff intends to offer:

- 22 a. Defendant Sacramento City Unified School District's Response to
23 Interrogatories, Set No. 1;
- 24 b. Defendant Sacramento City Unified School District's Supplemental
25 Response to Interrogatories, Set No. 1;
- 26 c. Defendant Sacramento City Unified School District's Response to
27 Interrogatories, Set No. 2, dated September 4, 2003;
- 28

1 d. Defendant Sacramento City Unified School District's Response to Request
2 for Production of Documents set one, September 4, 2003;

3 e. Defendant Twin Ridges Elementary School District's Response to
4 Interrogatories, Set No. 1;

5 f. Defendant Twin Ridges Elementary School District's Response to
6 Interrogatories, Set No. 2, dated September 4, 2003;

7 g. Defendant Twin Ridges Elementary School District's Response to
8 Interrogatories, Set No. 3, dated December 2, 2003;

9 h. Defendant Twin Ridges Elementary School District's Response to Request
10 for Production of Documents set one, September 4, 2003.

11 **13. FURTHER DISCOVERY OR MOTIONS:**

12 None, except for further in limine motions.

13 **14. STIPULATIONS:**

14 None.

15 **15. AMENDMENTS-DISMISSALS:**

16 None.

17 **16. SETTLEMENT NEGOTIATIONS:**

18 Settlement negotiations have taken place between the parties to no avail. The
19 parties do not request a further settlement conference.

20 **17. AGREED STATEMENTS:**

21 The parties do not believe an agreed statement of facts is feasible or advisable.
22 Plaintiff and Defendants dispute almost all of the pertinent facts of this case. The case almost
23 exclusively involves mixed questions of law and fact and issues.

24 However, the court previously granted summary adjudication on the issue of
25 secular purpose for both school districts on September 24, 1999.

26 **18. SEPARATE TRIAL OF ISSUES:**

27 The parties do not believe a separate trial on any issues is necessary.

28 **19. IMPARTIAL EXPERTS - LIMITATION OF EXPERTS:**

1 Plaintiff disclosed no expert witnesses before the April 16, 2004, deadline.

2 Defendants disclosed Dr. Douglas Sloan and Robert Anderson. No other non-
3 percipient witnesses will be called at trial.

4 **20. ATTORNEYS' FEES:**

5 The matter of the award of attorneys' fees to prevailing parties pursuant to statute
6 will be handled by motion in accordance with Local Rule 54-293.

7 **21. CONCISE STATEMENT OF EVERY NON-DISCOVERY MOTION AND**
8 **ITS RESOLUTION:**

9 The disposition of the non-discovery motions filed in this matter are as follows:

10 a. **Motion for Summary Judgment or, in the Alternative, Summary**
11 **Adjudication of Issues pursuant to the Federal Rules of Civil Procedure, rule 56**

12 Defendants' filed a Motion for Summary Judgment or, in the Alternative,
13 Summary Adjudication of Issues on May 6, 1999.

14 The court denied Defendants' motion for summary judgment, but granted
15 Defendants' motion for summary adjudication, finding Defendant SCUSD has a secular purpose for the
16 operation of John Morse; Defendant TRESA has a secular purpose for the operation of Yuba River.

17 b. **Daubert Motion**

18 Defendants' filed a Daubert motion on February 1, 2001, to exclude the Plaintiff's
19 proposed expert witnesses: Dan Dugan, John Morehead, Dr. James M. Morton, Dr. Eugenie Scott,
20 Debra Snell and Kathleen Stuphen.

21 The court ordered that Dan Dugan and John Morehead be excluded as expert
22 witnesses. The court limited the testimony of Dr. James M. Morton to his expertise as to religion
23 regarding his definition as encompassed by the Christian doctrines, Protestant doctrines and individual
24 Southern Baptist doctrines.

25 Plaintiff conceded to the court that Debra Snell and Kathleen Stuphen will testify
26 as percipient witnesses instead of as expert witnesses. Plaintiff conceded that Dr. Eugenie Scott will not
27 be called to testify as an expert witness.

28 c. **In Limine Motions**

1 The disposition of Defendants’ Motions in Limine filed on February 1, 2001, are
2 as follows:

3 Motion in Limine 1:

4 The court granted Defendants’ motion to exclude non-party witnesses from the
5 courtroom during the testimony of other witnesses.

6 Motion In Limine 2:

7 The court granted Defendants’ motion to exclude any testimony by “expert”
8 witnesses not disclosed pursuant to the court’s scheduling order of October 5, 1998.

9 Motion In Limine 3:

10 The court denied Defendants’ motion to exclude exhibits not produced in exhibit
11 exchange subject to the following provisions, as referenced below, being met by the Plaintiff within
12 fifteen days from the date of the hearing held on April 11, 2001. The court ordered the following
13 provisions:

14 The court ordered the Plaintiff to make the copyrighted videotapes (exhibits 30-31
15 on Plaintiff’s exhibit list from the Amended Pretrial Conference Order filed April 24, 2001) physically
16 available to the Defendants, by sending the originals to the Defendants and allowing them to make
17 copies of the videotapes or making copies of the videotapes themselves and sending them to the
18 Defendants.

19 The court ordered the Plaintiff to place dates on the student work (exhibits 43-44),
20 and the student work must be physically made available to the Defendants.

21 The court ordered the Plaintiff to produce and exchange the books and pamphlets
22 (exhibits 91-102) with the Defendants.

23 Motion In Limine 4:

24 The court reserved its ruling for trial on Defendants’ motion to exclude evidence
25 of anthroposophy not relevant to the determination of whether it is a religion or to the teachings or
26 activities at either school.

27 Motion In Limine 5:

1 The court reserved its ruling for trial on Defendants' motion to exclude evidence
2 regarding Rudolf Steiner not relevant to the methods at either school.

3 Motion In Limine 6:

4 The court reserved its ruling until the time of trial on Defendants' motion to
5 exclude testimony by witnesses lacking personal knowledge. The court advised the Plaintiff that it is
6 required to provide an offer of proof as to all witnesses with respect to their personal knowledge. The
7 court additionally requested a proffer regarding Dan Dugan, John Morehead, Dr. James M. Morton,
8 Debra Snell and Kathleen Stuphen before they testify.

9 Motion In Limine 7:

10 The court reserved its ruling for trial on Defendants' motion to exclude evidence
11 of personal beliefs or practices of witnesses.

12 Motion In Limine 8:

13 The court granted Defendants' motion to exclude evidence of past acts or
14 practices at either school with the understanding that this does not preclude the Plaintiff from presenting
15 conduct that is relevant to establish present conduct.

16 Motion In Limine 9:

17 The court granted Defendants' motion to exclude evidence of teachings and
18 activities of private Waldorf schools, unless the Plaintiff can establish an offer of proof that the evidence
19 or testimony about the private schools is relevant to the schools in question.

20 Motion In Limine 10:

21 The court granted Defendants' motion to exclude evidence of the teachings and
22 activities of public Waldorf schools, unless the Plaintiff can establish an offer of proof to show that there
23 is a connection between what is going on in other Waldorf methods public schools and the schools in
24 question.

25 d. **Motion for Summary Judgment or, in the Alternative Summary**
26 **Adjudication of Issues**

27 Plaintiff's Motion for Summary Judgment or, in the Alternative, Summary
28 Adjudication filed on May 28, 2004, was denied. The Memorandum and Order issued by the court on

November 15, 2004, stated that triable issues of material fact exist as to whether anthroposophy is a religion, as well as whether the method of education implemented at John Morse and Yuba River advances and promotes anthroposophy.

22. ESTIMATE OF TRIAL/TRIAL DATE:

Defendants agree to the sixteen-day trial estimate established by the court's last pretrial order. Defendants request the court schedule this trial at the court's earliest convenience.

23. MISCELLANEOUS:

Because this case presents primarily mixed questions of law and/or mixed questions of law and fact, Defendants request the opportunity to file a pretrial brief setting forth the legal standards, and a post-trial brief to include proposed findings of fact and conclusions of law.

Respectfully submitted,

GIRARD & VINSON, LLP

Date: January 6, 2005.

By _____
MICHELLE L. CANNON
Attorneys for Defendant TWIN RIDGES ELEMENTARY
SCHOOL DISTRICT

KRONICK MOSKOVITZ TIEDEMANN & GIRARD

Date: January 6, 2005.

By _____
SUSAN R. DENIOUS
Attorneys for Defendant SACRAMENTO CITY UNIFIED
SCHOOL DISTRICT

Date: January 6, 2005.

By _____
SCOTT KENDALL
Attorney for Plaintiff PLANS, INC.

Exhibit "A"

Plaintiff's Witness List

1.	Dr. Chrystal Olsen	(Defendants' Expert) To describe the purpose of bringing Waldorf education into the public sector.
2.	Robert L. Anderson	(Defendants' Expert) To describe his experience with the work of Ruldolf Steiner and with Waldorf education.
3.	Betty Staley	(Defendants' Expert) To describe her understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
4.	Dr. Douglas Sloan	(Defendant's expert) To describe the relationship between Anthroposophy and religion.
5.	Terry Pequette	To provide percipient testimony regarding the operation of the publicly funded Waldorf school in the Twin Ridges Elementary School District.
6.	Francesca Schomberg	To provide percipient testimony regarding the operation of the publicly funded Waldorf school in the Sacramento City Unified School District
7.	Tina Means	To provide percipient testimony regarding the operation of the publicly funded Waldorf school in the Sacramento City Unified School District
8.	Eugene Schwartz	To provide foundational testimony regarding the relationship between Waldorf Education and Anthroposophy
9.	Lee Pope	To provide percipient testimony regarding the

1			operation of the publicly funded Waldorf school in the
2			Twin Ridges Elementary School District.
3	10.	Caitlan Cawley	To provide percipient testimony regarding the
4			operation of the publicly funded Waldorf school in the
5			Twin Ridges Elementary School District.
6	11.	David Anderson	To provide percipient testimony regarding the
7			operation of the publicly funded Waldorf school in the
8			Twin Ridges Elementary School District.
9	12.	Carol Fegte	To provide percipient testimony regarding the
10			operation of the publicly funded Waldorf school in the
11			Twin Ridges Elementary School District.
12	13.	Karen Geisler	To provide percipient testimony regarding the
13			operation of the publicly funded Waldorf school in the
14			Twin Ridges Elementary School District.
15	14.	George Hoeffcker	To provide percipient testimony regarding the
16			operation of the publicly funded Waldorf school in the
17			Twin Ridges Elementary School District and oversight
18			thereof in his role as superintendent.
19	15.	Carol Nimick	To provide percipient testimony regarding the
20			operation of the publicly funded Waldorf school in the
21			Twin Ridges Elementary School District.
22	16.	Sallie Romer	To provide percipient testimony regarding the
23			operation of the publicly funded Waldorf school in the
24			Twin Ridges Elementary School District.
25	17.	David Taylor	To provide percipient testimony regarding the
26			operation and administration of of the publicly funded
27			Waldorf school in the Twin Ridges Elementary School
28			District.

18.	Caleb Buckley	To provide percipient testimony regarding the operation and administration of the publicly funded Waldorf school in the Twin Ridges Elementary School District.
19.	Irma Jue	To provide percipient testimony regarding the operation and administration of the publicly funded Waldorf school in the Sacramento City Unified School District.
20.	Lauren Rice	To provide percipient testimony regarding the operation of the publicly funded Waldorf school in the Sacramento City Unified School District.
21.	Patricia Ryan	To provide percipient testimony regarding the operation of the publicly funded Waldorf school in the Sacramento City Unified School District.
22.	Cynthia Hoven	To provide percipient testimony regarding describe her understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
23.	Margit Ilgen	To provide percipient testimony regarding describe her understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
24.	Ina Jaehnig	To provide percipient testimony regarding describe her understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
25.	Ernst Schuberth	To provide percipient testimony regarding describe his understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
26.	Rena Osmer	To provide percipient testimony regarding describe her understanding of the relationship between

		Anthroposophy, religion, and Waldorf Education.
27.	Peggy Alessandri	To provide percipient testimony regarding describe her understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
28.	Astrid Schmitt-Stegmann	To provide percipient testimony regarding describe her understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
29.	Dennis Klocek	To provide percipient testimony regarding describe his understanding of the relationship between Anthroposophy, religion, and Waldorf Education.
30.	Ann Mathews	To provide percipient testimony about the Waldorf seminars and instruction attended by teachers at the subject schools.
31.	Else Gottgens	To provide percipient testimony about the Waldorf seminars and instruction attended by teachers at the subject schools.
32.	Rev. Franziska Hesse	To provide foundational testimony about anthroposophy teachings and practices and the relationship between Anthroposophy and religion.
33.	Rev. Sanford Miller	To provide foundational testimony about anthroposophy teachings and practices and the relationship between Anthroposophy and religion.
34.	Robert London	To provide foundational testimony about anthroposophy teachings and practices and the relationship between Anthroposophy and religion.

1 ATTACHMENT "B"

2
3 Defendants' Witness List

4
5 Sacramento City Unified School District Witnesses:

6 1. Lisa Broadkey: parent. Defendants anticipate Ms. Broadkey will testify regarding
7 the program at John Morse.

8 2. Chris Chavez: teacher. Defendants anticipate Ms. Chavez will testify regarding
9 the program at John Morse.

10 3. Cheryl Eining: principal. Defendants anticipate Ms. Eining will testify regarding
11 the Waldorf methods program at John Morse.

12 4. David Kuchera: parent. Defendants anticipate Mr. Kuchera will testify regarding
13 the program at John Morse.

14 5. Jane Marks: parent. Defendants anticipate Ms. Marks will testify regarding the
15 program at John Morse.

16 6. Susan Miller: administrator. Defendants anticipate Ms. Miller will testify as to
17 the oversight and operation of John Morse.

18 7. Lauren Rice: teacher. Defendants anticipate Ms. Rice will testify regarding the
19 program at John Morse.

20 8. Barbara Warren: teacher. Defendants anticipate Ms. Warren will testify regarding
21 the program at John Morse.

22 9. Chris Whetstone: parent and teacher. Defendants anticipate Mr. Whetstone will
23 testify regarding the program at John Morse.

24 Twin Ridges Elementary School District Witnesses:

25 10. Caleb Buckley: administrator. Defendants anticipate Mr. Buckley will testify
26 regarding the Waldorf methods program at Yuba River.

27 11. Marshall Goldberg: parent. Defendants anticipate Mr. Goldberg will testify
28 regarding the program at Yuba River.

1 12. Frank Lawrence: parent. Defendants anticipate Mr. Lawrence will testify
2 regarding the program at Yuba River.

3 13. John Lee: parent. Defendants anticipate Mr. Lee will testify regarding the
4 program at Yuba River.

5 14. Jill Messier: teacher. Defendants anticipate Ms. Messier will testify regarding the
6 upper grades program at Yuba River.

7 15. Carol Nimick: teacher. Defendants anticipate Ms. Nimick will testify regarding
8 the primary grades program at Yuba River.

9 16. David Taylor: superintendent. Defendants anticipate Mr. Taylor will testify
10 regarding the oversight and operation of Waldorf methods schools in Twin Ridges.

11 Defendants' Expert Witnesses:

12 17. Robert Anderson: California Dept. of Education. Defendants anticipate Mr.
13 Anderson will testify as a percipient and an expert witness regarding the California State Curriculum
14 Frameworks and the curriculum of both schools at issue.

15 18. Dr. Douglas Sloan: Professor Emeritus, Teachers College, Columbia University.
16 Defendants anticipate Dr. Sloan will testify as a percipient and expert witness regarding religion,
17 philosophy, education, and anthroposophy.

Exhibit “C”

Plaintiff’s Exhibit List

1.	Bob Anderson’s Report re Anthroposophy and Waldorf Education, dated January 23, 1999
2.	Resume of Crystal Tilton Olson, Ed.D.
3.	“Learning that Grows with the Learner: An Introduction to Waldorf Education”
4.	Foundation Year Book List 1993-1994
5.	Teacher Education Book List 1993-1994
6.	Notes of Crystal Tilton Olson, Ed.D.
7.	The John Morse Waldorf Methods School Draft Curriculum
8.	Yuba River Charter School Mission Statement and Curriculum
9.	“The Waldorf Approach Applied in the Public School Classroom, Summer Institute for Teachers, July 19-30, 1999, Rudolf Steiner College”
10.	“The Waldorf Approach to Education,” Betty Staley
11.	“Comparison of Waldorf training (Diploma) at Steiner College and Oak Ridge Waldorf Certificate (adapted for the Public School Teacher)”
12.	“Waldorf Education Adapted for the Public School Training Program, Oak Ridge Waldorf Methods Magnet Elementary School”
13.	“Waldorf Education in America: A Promise and Its Problems,” Ray McDermott
14.	“Racism and Waldorf Education,” Ray McDermott
15.	“Anthroposophy and Waldorf Education”
16.	Letter to “Twin Ridges Alternative School Colleagues” from Terry Pequette, October 13, 1995
17.	“Twin Ridges Alternative Charter School, Parent Handbook, ’95-’96”
18.	“Waldorf Parenting Handbook,” Lois Cusick
19.	Twin Ridges, “Newsletter,” September 21, 1995
20.	“Martinmas”

1	21.	Festivals in the Waldorf School with Activities, Songs, Verses for Children
2	22.	"First Grade Readiness and Related Issues," Joan Almon
3	23.	Anthroposophical Press, Complete Catalog
4	24.	"Man and Animal," Roy Wilkinson
5	25.	"What is Taught in Waldorf Schools?" William J. Bennetta
6	26.	"Charter for Indoctrination," Rob Boston
7	27.	"The Interpretation of Fairy Tales," Wilkinson
8	28.	"The Education of the Child and Early Lectures on Education," Rudolf Steiner
9	29.	"The Child's Changing Consciousness As the Basis of Pedagogical Practice," Rudolf Steiner
10	30.	"Rudolf Steiner, Esoteric Christianity, and the New Age Movement," Roger E. Olson
11	31.	"Waldorf Education and New Age Religious Consciousness"
12	32.	"Lecture II"
13	33.	Class notes of Kathleen Sutphen
14	34.	Letter from Robert Mc Dermott of Rudolf Steiner College to Friends, November 25, 1996
15	35.	Notes re RSC Spring, 1997, Training Sessions
16	36.	"The Esoteric Basis of The Threefold Social Order and the Mission of Waldorf Education," Gary Lamb
17	37.	"Waldorf Education: Schooling the Head, Hands and Heart," Ronald E. Kotzsch, Ph.D.
18	38.	"Waldorf Education...An Introduction" by Henry Barnes
19	39.	Rudolf Steiner College Program Offerings
20	40.	Association of Waldorf Schools of North America "Position Statement: Affiliation with the Association of Waldor Schools of North America and Use of the trademark name "Waldorf" or "Rudolf Steiner" Education
21		
22	41.	Student Work from Oak Ridge Elementary
23	42.	Student Work from Twin Ridges Elementary
24	43.	Oak Ridge School Student Work Reflecting Anthroposophy
25	44.	Twin Ridges Alternative Charter School Plan
26	45.	Twin Ridges Policy and Procedures
27	46.	Twin Ridges "Faculty Vision"
28		

1	47.	"Dear Kindergarten Parents," August 30, 1995
2	48.	"Bibliography," handout to Twin Ridges' parents by 6 th Grade teacher, September, 1995
3	49.	"Recommended Reading," handout to Twin Ridges parents, Fall, 1995
4	50.	"Some Guidelines for First Grad Readiness," Nancy Foster
5	51.	"Confessions of A Waldorf Parent," Margaret Gorman
6	52.	"Speaking with the Young Child (Through the Kindergarten Years)," Stephen Spitalny
7	53.	"Interview Questions for Charter School Teachers"
8	54.	To: Fellow Lavender Kindergarten Parents, From: Lisa Schenck
9	55.	Notes re Carol Nimmick
10	56.	Lee Pope – Biography
11	57.	"Dear Parent Council Members and Fifth Grade Families," 1/17/96
12	58.	Newsletter, October 19, 1995
13	59.	Gateways Educational Services handout
14	60.	Gateways Educational Services Report on Twin Ridges student Doe 1
15	61.	Gateways Educational Services Report on Twin Ridges student Doe 2
16	62.	What is Michaelmas?
17	63.	Newsletter, September 21, 1995
18	64.	Letter to Parents from Faculty, September 21, 1995
19	65.	Newsletter, November 3, 1995
20	66.	Newsletter, November 9, 1995
21	67.	Newsletter, November 16, 1995
22	68.	Newsletter, November 30, 1995
23	69.	Newsletter, March 7, 1996
24	70.	Student Work, Ryan McKay's Reader
25	71.	"Anthroposophical Society, Fostering the Life of the Soul"
26	72.	"Anthroposophy and the Waldorf Schools," p. 117
27	73.	Anthroposophical Education, p. 283
28		

1	74.	What is Eurythmy, Rene M. Querido
2	75.	Lecture Notes from Rudolf Steiner College
3	76.	SFWS, Bloom 1991, p. 2
4	77.	"A Christian Mystery"
5	78.	"Morning Verse for Lower Grades"
6	79.	"Nature-Based School"
7	80.	"Christmas Season in a Public School," James W. Petersen
8	81.	"Waldorf Education Develops the Fundamental Capacities of the Child Through the Balance of Its Subjects"
9	82.	"The Plant World"
10	83.	"The Wave Theory of Light"
11	84.	Steiner, ONS, p. 112
12	85.	The Temple Legend, p. 220
13	86.	Lecture Three, p. 41
14	87.	Oak Ridge Elementary Pictures
15	88.	Pictures from other Waldorf Schools
16	89.	"The Waldorf Teacher's Survival Guide," Eugene Schwartz
17	90.	"An Overview of the Waldorf Kindergarten: Articles from the Waldorf Kindergarten Newsletter 1981 to 1992
18		Volume One"
19	91.	"Rudolf Steiner's Curriculum for Waldorf Schools: An Attempt to summarize his indications: A collection of
20		quotations for the benefit of different Waldorf Schools."
21	92.	"Lighting Fires (Inner Work for Teachers)," J. Smit
22	93.	"The Esoteric Background of Waldorf Education, The Cosmic Christ Impulse," Rene M. Querido
23	94.	"Dr. Rudolf Steiner and the Science of Spiritual Realities" video
24	95.	"Rudolf Steiner: An Introduction to his Life and Works" video
25	96.	"Waldorf Education: A Vision of Wholeness" video
26	97.	"Reviving the Art of Education" video
27	98.	"Taking a Risk in Education: Waldorf –Inspired Public Schools" video
28		

1	99.	Advent Spiral Video
2	100.	<u><i>“Taking back our schools, a manual for parents”</i></u>
3	101.	“Storytelling with children”
4	102.	“Creating bedtime tales your children will dream on”
5	103.	“Festivals family and food”
6	104.	“Making make-believe”
7	105.	“The moral intelligence of children”
8	106.	“How to raise a moral child”
9	107.	“Festivals together, a guide to multicultural celebration”
10	108.	“All Year Round (Festival ideas),” A. Druitt,
11	109.	“And Then Take Hands,” M. Von Heider
12	110.	“Biography of Waldorf Education,” W. Aeppli
13	111.	“Festivals Together,” S. Fitzjohn
14	112.	“Festivals With Children,” B. Barz
15	113.	“Festivals, Family and Food,” D. Carey
16	114.	“Introduction to Waldorf Education,” H. Barnes
17	115.	“Lighting Fires,” J. Smit
18	116.	“Multi-culturalism in Waldorf Education,” WMCC
19	117.	“Parent Participation in Waldorf Schools,” M. Leist
20	118.	“Recovery of Man in Childhood,” A.C. Harwod
21	119.	“Steiner Education in Theory and Practice,” G. Chillis
22	120.	“Waldorf Education Worldwide,” H. Mattke
23	121.	Waldorf Kindergarten Newsletters, Vol. I-II, Collection
24	122.	“You Wanted to Know What a Waldorf School is” A. Howard
25	123.	Volume 26, No. 1, “Money, Child and Man”
26	124.	Volume 26, No. 2, “Europe, Child and Man”
27	125.	Volume 27, No. 1, “Festivals, Child and Man”
28		

1	126.	Volume 27, No. 2, "Craft and Design, Child and Man"
2	127.	Volume 28, No. 1, "Child and Man"
3	128.	Volume 28, No. 2, "Child and Man"
4	129.	Volume 29, No. 2, "Child and Man"
5	130.	Volume 30, No. 2, "Steiner Education"
6	131.	"Proverbs and Sayings"
7	132.	"Learning and Behavior"
8	133.	"Practical Advice for Teachers"
9	134.	"Your Child's Growing Mind"
10	135.	"Rudolf Steiner's Curriculum for Waldorf schools"
11	136.	Waldorf Education: Rudolf Steiner's Ideas in Practice
12	137.	"The Nature Corner," M.V. Leeuwen & J. Moeskops
13	138.	Greek Myths, D'Aulaires
14	139.	The Ramayana
15	140.	Roy Wilkinson on Hebrew legends
16	141.	The Bible, New Revised Standard Edition
17	142.	The Bible (selected excerpts)
18	143.	The Bhagavad Gita
19	144.	The Kalevala
20	145.	Dorothy Harris on ancient history
21	146.	"Sleep" Audrey McAllen
22	147.	"Across the Centuries," Houghton-Mifflin
23	148.	"The Children of Odin," Patraic Collum
24	149.	"Man and Mammal"
25	150.	Seasonal Story and Song Books, Wynstone
26	151.	Edman on Waldorf education
27	152.	http://www.tresd.k12.ca.us/
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1	153.	http://www.yrcs.tresd.k12.ca.us/
2	154.	http://www.scusd.edu/elem_schools/johnmorse/
3	155.	http://schools.scusd.edu/johnmorse/
4	156.	http://www.steinercollege.edu
5	157.	http://www.anthroposophy.org/
6	158.	http://www.thechristiancommunity.org
7	159.	"Between Form and Freedom: A Practical Guide to the Teenage Years," Betty Staley
8	160.	"Hear the Voice of the Griot: A Guide to the History, Geography and Culture of Africa," Betty Staley
9	161.	"Tapestries: Weaving Life's Journey," Betty Staley
10	162.	"Soul Weaving," Betty Staley
11	163.	2004-2005 Year Booklists
12	164.	Rudolph Steiner College Bookstore, Complete Catalog
13	165.	The Christian Community Church, pictures
14	166.	The Seminary of the Christian Community Church, pictures
15	167.	Selected writings, The Christian Community Church
16	168.	Selected writings, Franziska Hesse
17	169.	Selected writings, Sanford Miller
18	170.	"Waldorf Education and Anthroposophy," Rudolph Steiner
19	171.	"Kingdom of Childhood," Rudolph Steiner
20	172.	"Outline of Esoteric Science," Rudolph Steiner
21	173.	"The Spiritual Hierarchies," Rudolph Steiner
22	174.	"Spirit and Art," Van James
23	175.	"Passion of the Western Mind," Richard Tarnas
24	176.	"The Other America," Carl Stegmann,
25	177.	"Parzival," Eschenbach
26	178.	Selected Essays, Lectures, Poems (R.W. Emerson)
27	179.	"The American Scholar" R.W. Emerson
28		

1	180.	"Nature," R.W. Emerson
2	181.	"Moby Dick," Herman Melville
3	182.	"Civil Disobedience," H.D. Thoreau
4	183.	"Intuitive Thinking as a Spiritual Path" (Philosophy of Spiritual Activity), Rudolph Steiner
5	184.	"How to Know Higher Worlds," Rudolph Steiner
6	185.	"Theosophy," Rudolph Steiner
7	186.	"Calendar of the Soul," Rudolph Steiner
8	187.	"Manifestations of Karma" (Reincarnation and Karma), Rudolph Steiner
9	188.	"Karmic Relationships," Rudolph Steiner
10	189.	"Questions and Answers on Reincarnation and Karma," Rene Querido
11	190.	"Towards Social Renewal" (Threefold Social Order), Rudolph Steiner
12	191.	"Freeing the Human Spirit," Michael Spence
13	192.	"Rudolf Steiner, Herald of a Modern Consciousness," Stewart Easton
14	193.	"Anthroposophical Leading Thoughts," Rudolph Steiner
15	194.	"The Essential Steiner," Robert McDermott
16	195.	"Study of Man," Rudolph Steiner
17	196.	"Practical Advice to Teachers," Rudolph Steiner
18	197.	"Discussions with Teachers," Rudolph Steiner
19	198.	"Balance in Teaching," Rudolph Steiner
20	199.	"Waldorf Education for Adolescents," Rudolph Steiner
21	200.	"The Education of the Child," Rudolph Steiner
22	201.	"Education as a Social Problem," Rudolph Steiner
23	202.	"Three Lectures for Lectures for Teachers on the Curriculum," Rudolph Steiner
24	203.	"Rudolf Steiner's Curriculum for Waldorf Schools," E.A. Karl Stockmeyer
25	204.	"The Wisdom of Fairy Tales," Rudolf Meyers
26	205.	"Curative Education," Rudolph Steiner
27	206.	"Christianity as Mystical Fact," Rudolph Steiner
28		

1	207.	"The Spiritual Guidance of the Individual and Humanity," Rudolph Steiner
2	208.	"The Younger Generation," Rudolph Steiner
3	209.	"Kingdom of Childhood," Rudolph Steiner
4	210.	"The Child's Changing Consciousness & Waldorf Education," Rudolph Steiner
5	211.	"Understanding Young Children," Rudolph Steiner
6	212.	"The Cycle of the Year as a Breathing Process," Rudolph Steiner
7	213.	"The Festivals and their Meaning," Rudolph Steiner
8	214.	"Anthroposophy in Everyday Life," Rudolph Steiner
9	215.	"The Four Seasons and the Archangels," Rudolph Steiner
10	216.	"Living a Spiritual Year," Adrian Anderson
11	217.	"Festival Images for Today," Carlo Pietzner
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ATTACHMENT “D”

Defendants’ Exhibit List

Defendants’ Joint Exhibits:

- A. Plaintiff’s September 9, 1998 Response to Interrogatories propounded by SCUSD.
- B. Plaintiff’s September 9, 1998 Response to Interrogatories propounded by Twin Ridges.
- C. Plaintiff’s March 4, 1999 Response to Interrogatories propounded by SCUSD.
- D. PLANS’ Answer to Special Interrogatories propounded by Defendants, Net No. Three, dated January 15, 2004;
- E. PLANS’ Response to Request for Admissions propounded by Defendants, Set No. One, dated January 15, 2004;
- F. PLANS’ Supplemental Answer to Special Interrogatories propounded by Defendants, Set No. Three, dated February 22, 2004;
- G. PLANS’ Second Supplemental Answer to Special Interrogatories propounded by Defendants, Set No. Three, dated March 31, 2004;
- H. PLANS’ Response to Request for Production of Documents propounded by Defendants, Set No. Two, dated March 31, 2004;
- I. PLANS’ Supplemental Response to Request for Admissions propounded by Defendants, Set No. One, dated March 31, 2004.
- J. State Curriculum Frameworks for Mathematics.
- K. State Curriculum Frameworks for Science.
- L. State Curriculum Frameworks for History/Social Science.
- M. State Curriculum Frameworks for English-Language Arts.
- N. California Department of Education handbook entitled “Moral, Civic, and Ethical Education.”
- O. California Department of Education handbook entitled “Social Studies Review, Character Education.”

- 1 P. California Department of Education handbook entitled “Elementary Makes the
2 Grade.”
- 3 Q. California Department of Education Character Education annotated bibliography.
- 4 R. California Department of Education Character Education documents.
- 5 S. The President’s Guidelines to Religion in Schools.
- 6 T. PLANS/Dugan e-mails and web-site postings.
- 7 Sacramento City Unified School District Exhibits:
- 8 U. Curriculum for John Morse Waldorf Methods Magnet School.
- 9 V. John Morse Teacher Lesson Plans.
- 10 W. John Morse Block Rotation Schedules.
- 11 X. Collective Bargaining Agreement between Sacramento City Unified School
12 District and Sacramento City Teachers Association.
- 13 Y. Photographs of John Morse.
- 14 Z. July 1997 letter from Dan Dugan to Tom Griffin.
- 15 AA. July 1997 letter from Dan Dugan to Matt McDonald.
- 16 Twin Ridges Elementary School District Exhibits:
- 17 BB. Curriculum for the Yuba River Charter School.
- 18 CC. Current Charter for Yuba River Charter School.
- 19 DD. Yuba River Charter School Teacher Lesson Plans.
- 20 EE. Yuba River Charter School Block Rotation Schedules.
- 21 FF. Yuba River Charter School Weekly Schedule.
- 22 GG. Yuba River Charter School Accountability Reports.
- 23 HH. Twin Ridges Elementary School District Accountability Reports.
- 24 II. Twin Ridges Elementary School District Accountability Rubrics.
- 25 JJ. Yuba River Charter School teacher evaluation forms.
- 26 KK. Yuba River Charter School Newsletters.
- 27 LL. Yuba River Charter School parents handout, Educational Overview.
- 28 MM. Nevada County and Yuba River Charter School STAR profile.

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- NN. Twin Ridges Elementary School District Newsletters.
- OO. Photographs of Yuba River Charter School.