

**IN THE STATE BOARD OF EDUCATION
STATE OF GEORGIA**

IN RE: TERMINATION HEARING OF :
THE BOARD MEMBERS OF THE :
DOOLY COUNTY BOARD OF :
EDUCATION. :

MOTION FOR CONTINUANCE OF HEARING

COMES NOW the undersigned as attorney and on behalf of the Dooly County Board of Education, in the above-styled case and hereby moves the Hearing Officer and the State Board of Education to continue the hearing in this case, and as grounds shows the following conflict:

1.

Attorney for Dooly County Board of Education has a deposition scheduled for September 23, 2016 beginning at 10:00 a.m. in Fort Lauderdale, Florida. Attached hereto as Exhibit A is the Notice of Deposition.

2.

Attorney airline flight to Fort Lauderdale, Florida is scheduled to leave Augusta, Georgia on September 22, 2016 at 7:55 a.m. Attached hereto as Exhibit B is Delta Trip Confirmation.

3.

The deposition is in a case that is pending in Federal Court and is under strict deadlines and cannot be rescheduled.

WHEREFORE, Attorney for Dooly County Board of Education prays that the hearing scheduled for September 22, 2016 be continued.

This 14th day of September, 2016.

/S/ John M. Brown

JOHN M. BROWN

2603 Commons Blvd
Suite C
Augusta, Georgia 30909
706/731-9925

Attorney for Respondent
GA Bar No. 088138

CERTIFICATE OF MAILING

This is to certify that I have on this date served a copy of the foregoing **MOTION FOR CONTINUANCE OF HEARING** by email and US MAIL with postage affixed hereon to insure delivery as follows:

w.sampson@tkstlaw.com
Tom Sampson, Special Assistant Attorney General
Georgia Department of Education
3355 Main Street
Atlanta, GA 30337

dcaputo@doe.k12.ga.us
Debbie Caputo
Administrative Liaison to the State Board of Education
205 Jesse Hill Jr. Drive SE
2072 Twin Towers East
Atlanta, GA 30334

Dated this 14th day of September, 2016.

2603 Commons Blvd
Suite C
Augusta, Georgia 30909
706/731-9925

/s/ John M. Brown
JOHN M. BROWN
Attorney for Respondent
GA Bar No. 088138

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

MICHAEL ANTHONY TARVER

Plaintiff,

v.

GREGORY MCLAUGHLIN, *et al.*

Defendant.

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CIVIL ACTION NO.
5:14-CV-214-MTT-MSH

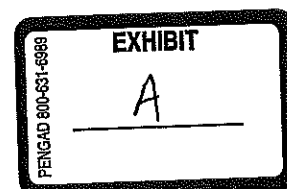
NOTICE OF DEPOSITION OF
JOHN MACDONALD, MD

TO: John MacDonald, MD, by and through counsel for Plaintiff,

John Brown, Esq.
2603 Commons Blvd
Suite C
Augusta, GA. 30909

Shellana Welch, Esq.
921 Cannock Street
Grovetown, GA 30813

You are hereby notified that on September 23, 2016 beginning at 10:00am at the law firm of Panza Maurer, Coastal Towers, Suite 905, 2400 East Commercial Boulevard, Fort Lauderdale, Florida 33308, Counsel for Defendants Gregory McLaughlin and Chiquita Fye will take the Deposition of Plaintiff's designated expert witness John MacDonald, MD, upon oral examination pursuant to Federal Rule of Civil Procedure 30(a)(2)(B). This deposition will be taken for discovery, cross examination, for preservation of testimony for use at trial, and all other purposes



allowed by law. This deposition will be recorded by stenographic means before an officer duly authorized by law to administer oaths.

Respectfully submitted, this 6th day of September, 2016

/s/Elizabeth Crowder
Assistant Attorney General
Georgia Bar No.100809
Attorney for Defendants

Department of Law, State of Georgia
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
Telephone: (404) 656-6686
Facsimile: (404) 651-5304
E-mail: ecrowder@law.ga.gov

DISCOVERY CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2016, I served the within and foregoing
NOTICE OF DEPOSITION OF JOHN MACDONALD, MD, via electronic mail
upon the following attorneys of record:

John Brown
2603 Commons Blvd
Suite C
Augusta, GA. 30909
Mike@mikebrownlaw.net

Shellana Welch
921 Cannock Street
Grovetown, GA 30813
shellana.welch@gmail.com

/s/Elizabeth Crowder
Assistant Attorney General
Georgia Bar No. 100809
Attorney for Defendants

Department of Law, State of Georgia
40 Capitol Square, S.W.
Atlanta, GA 30334-1300
Telephone: (404) 656-6686
Facsimile: (404) 651-5304
ecrowder@law.ga.gov



Hello, JOHN MICHAEL

SkyMiles® #*****081 >

Your Trip Confirmation #: HTMXBR

MANAGE MY TRIP >

Thu, 22SEP

DEPART

ARRIVE

DELTA 2626
MAIN CABIN (V)

AUGUSTA, GA
7:55am

ATLANTA
9:05am

DELTA 2026
MAIN CABIN (V)

ATLANTA
10:00am

FT LAUDERDALE, FL
11:57am

Fri, 23SEP

DEPART

ARRIVE

DELTA 1527
MAIN CABIN (L)

FT LAUDERDALE, FL
7:00pm

ATLANTA
9:02pm

DELTA 965
MAIN CABIN (L)

ATLANTA
9:54pm

AUGUSTA, GA
10:54pm



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RESTRICTED HAZARDOUS ITEMS

To ensure the safety of our customers and employees, Delta no longer accepts **hoverboards or any lithium battery powered self-balancing personal transportation devices** on board its aircraft. These items are prohibited as both carry-on and checked baggage.

Spare batteries for other devices, fuel cells, and e-cigarettes are permitted in carry-on baggage only. If your carry-on bag contains these items and is gate checked, **they must be removed and carried in the cabin.** Further information and specific guidelines regarding restricted items can be found here.

