

STATE OF VERMONT

SUPERIOR COURT
Rutland Unit

CIVIL DIVISION
Docket No.: 380-7-16 Rdcv

Lola Duffort,)
)
)
 Plaintiff,)
)
 v.)
)
 Vermont Agency of Education, and Vermont)
 State Board of Education,)
)
 Defendants.)

ANSWER

NOW COME the Defendants the Vermont Agency of Education and the State Board of Education, by and through their attorney, Vermont Attorney General William H. Sorrell, and as and for an Answer to the Plaintiff's Complaint state, in accordance with Rule 8(b) of the Vermont Rules of Civil Procedure where with respect to averments characterizing Exhibits made reference to and relied upon in the Plaintiff's complaint, that any denials made by the Defendants are qualified regarding the Plaintiff's characterization of the complaint's Exhibits, as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
- 4.-6. Defendants are without knowledge or information sufficient to form a belief as to the truth of paragraphs 4 through 6.
7. Paragraph 7 is admitted.
8. Paragraph 8 is admitted.
9. Paragraph 9 is admitted.
10. Paragraph 10 is admitted.
11. Paragraph 11 is denied.
12. Paragraph 12 is a legal conclusion to which no responsive pleading is required.
13. Paragraph 13 is admitted.
14. Paragraph 14 is admitted.
15. Paragraph 15 is admitted.

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16. Paragraph 15 is admitted.
- 17.-18. Paragraphs 17 and 18 are denied insofar as Exhibits A and B speak for themselves.
19. Paragraph 19 is denied insofar as Exhibit C speaks for itself.
20. Paragraph 20 is admitted.
21. Paragraph 21 is admitted.
22. Paragraph 22 is admitted.
23. Paragraph 23 is admitted.
24. Paragraph 24 is admitted.
25. Paragraph 25 is denied.
26. Paragraph 26 is admitted.
27. Paragraph 27 is admitted.
28. Paragraph 28 is a legal conclusion to which no responsive pleading is required.
29. Paragraph 29 sets forth a legal conclusion to which no responsive pleading is required.
30. Paragraph 30 sets forth a legal conclusion to which no responsive pleading is required.
31. Paragraph 31 is denied.
32. Paragraph 32 is denied insofar as Exhibit D speaks for itself.
33. Paragraph 33 is admitted.
34. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34.
35. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35.
36. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36.
- 37.-39. Paragraphs 37 through 39 are denied insofar as Exhibit E speaks for itself.
- 40.-48. Paragraphs 40 through 48 are denied insofar as Exhibit F speaks for itself.
49. Paragraph 49 is denied.
50. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50.
51. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51.
52. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52.
- 53.-54. Paragraphs 53 through 54 are denied insofar as Exhibit F speaks for itself.

55. Paragraph 55 is denied.
- 56.-64. Paragraphs 56 through 64 are denied insofar as Exhibit G speaks for itself.
65. Paragraph 65 is admitted.
66. Paragraph 66 is admitted.
67. Paragraph 67 is admitted.
- 68.-70. Paragraphs 68 through 70 are denied insofar as Exhibit H speaks for itself.
71. Paragraph 71 is admitted.
- 72.-76. Paragraphs 72 through 76 are denied insofar as Exhibit I speaks for itself.
77. Paragraph 77 is admitted.
- 78.-79. Paragraphs 78 and 79 are denied insofar as Exhibit K speaks for itself.
80. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80.
81. Paragraph 81 is admitted.
82. Paragraph 82 is denied.
83. Paragraph 83 is denied.
- 84.-86. Paragraphs 84 through 86 are denied insofar as Exhibit L speaks for itself.
87. Paragraph 87 is admitted insofar as Exhibit M represents that the allegation in the averment is true.
88. Paragraph 88 is denied.
89. Paragraph 89 is admitted insofar as Exhibit M represents that the allegation in the averment is true.
90. Paragraph 90 is admitted.
- 91.- 94. Paragraphs 91 through 94 are denied as Exhibit M speaks for itself.
- 95.-98. Paragraphs 95 through 98 are denied as Exhibit N speaks for itself.
- 99.-101. Paragraphs 99 through 101 are denied as Exhibit N speaks for itself.
102. Paragraph 102 is denied insofar as Exhibit O speaks for itself.
- 103.-108. Paragraphs 103 through 108 are denied as Exhibit P speaks for itself.
109. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109.
110. Paragraph 110 is denied as Exhibit P speaks for itself.
- 111.-114. Paragraphs 111 through 114 are denied insofar as Exhibit D speaks for itself.
115. Paragraph 115 is admitted.
116. Paragraph 116 is admitted.
- 117.-118. Paragraphs 117 and 118 are denied as Exhibit Q speaks for itself.
119. Paragraph 119 is admitted.
120. Paragraph 120 is denied as Exhibit R speaks for itself.
121. Paragraph 121 is admitted.
122. Paragraph 122 is denied insofar as Exhibit Speaks for itself.

- 123.-125. Paragraphs 123 through 125 are denied insofar as Exhibit T speaks for itself.
126. Paragraph 126 is admitted.
127. Paragraph 127 is denied insofar as Exhibit U speaks for itself.
128. Paragraph 128 is admitted.
- 129.-130. Paragraphs 129 and 130 are denied insofar as Exhibit V speaks for itself.
131. Paragraph 131 is admitted.
132. Paragraph 132 is denied insofar as Exhibit V speaks for itself.
133. The Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 133.
134. Paragraph 134 is denied.
135. Paragraph 135 is admitted.
- 136.-138. Paragraphs 136 through 138 are denied as Exhibit X speaks for itself.
139. Paragraph 139 is denied.
140. Paragraph 140 is denied insofar as Exhibit Y speaks for itself.
141. Paragraph 141 is admitted.
142. Paragraph 142 is denied.
143. Paragraph 143 is admitted.
- 144.-145. Paragraphs 144 and 145 are denied as Exhibit AA speaks for itself.
146. Paragraph 146 is admitted.
- 147.-151. Paragraphs 147 through 151 are denied insofar as Exhibit BB speaks for itself.
152. Paragraph 152 is an introductory paragraph to which no responsive pleading is required.
- 153.-154. Paragraphs 153 and 154 are denied.
155. Paragraph 155 is an introductory paragraph to which no responsive pleading is required.
- 156.-157. Paragraphs 156 and 157 are denied.
158. Paragraph 158 is an introductory paragraph to which no responsive pleading is required.
- 159.-160. Paragraphs 159 and 160 are denied.
161. Paragraph 161 is an introductory paragraph to which no responsive pleading is required.
162. Paragraph 162 is denied.
163. Paragraph 163 is an introductory paragraph to which no responsive pleading is required.
164. Paragraph 164 is denied.
165. Paragraph 165 sets forth the Plaintiff's Request for Relief to which no responsive pleading is required, in all respects the relief requested as set forth in Paragraph 165 should be denied.

AFFIRMATIVE DEFENSES

1. No public records were wrongfully or improperly withheld from the Plaintiff by the Defendants.

DATED at Montpelier, Vermont this 16 day of September, 2016.

STATE OF VERMONT

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