

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

KENNETH W. ADAMS, ET AL. PLAINTIFFS
VERSUS CIVIL ACTION NO. 3:67-cv-04156-KHJ-MTP
RANKIN COUNTY, MS SCHOOL DISTRICT, ET AL. DEFENDANTS

UNITARY STATUS HEARING
SEPTEMBER 16, 2025
TRANSCRIPT VOLUME 1 OF 3

BEFORE THE HONORABLE KRISTI H. JOHNSON,
UNITED STATES DISTRICT COURT JUDGE,
THAD COCHRAN COURTHOUSE,
JACKSON, MISSISSIPPI

(APPEARANCES NOTED HEREIN.)

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1 **IN OPEN COURT, SEPTEMBER 16, 2025**

2
3 THE COURT: All right. Good morning. You may be
4 seated. I hope our out-of-state folks, y'all didn't have
5 any travel woes coming in. Everything good? Okay. Great.

6 Before we get started, I know that we talked about we
7 were going to start with opening statements and then if
8 there were any members of the public that wanted to do
9 comments that have already been submitted, we would allow
10 them an opportunity to speak.

11 But before we get into that, I do want to take up a
12 couple of our motions that are pending. I know that on the
13 pretrial conference call, we invoked the rule, and so some
14 of these matters do involve potential witnesses. And so if
15 there are any witnesses that are in the courtroom, not
16 objectors/commenters but true witnesses, I would ask that
17 they exit the courtroom now. So I don't know who the
18 witnesses are, so I'll leave that to the attorneys to handle
19 that.

20 All right. Let me first take up -- the plaintiff had
21 filed a motion to exclude, and it's ECF Number 163. The
22 district filed a response to the motion to exclude and have
23 conceded some of the issues that were raised by the
24 plaintiffs in that motion.

25 Is there anything else from the district or the

1 plaintiff with respect to that motion that the Court needs
2 to address? I'll start with the plaintiff since it's your
3 motion.

4 Is that mic on? There we go.

5 MS. FELDKAMP: Yes, Your Honor. I do want to preview
6 there are also a couple of other pretrial matters we would
7 like to raise. But on this point, the district's response
8 noted a desire to keep the 2025-'26 faculty and student data
9 in. Plaintiffs maintain their motion to exclude that data.
10 We appreciate that the district has offered a reasonable
11 justification for its delay, but the prejudice to plaintiffs
12 is not mitigated by that. Plaintiffs were still not able to
13 before trial and certainly cannot now analyze that data;
14 depose appropriate district representatives about it; or
15 have their expert analyze, respond, and prepare a report on
16 it.

17 In addition, you know, had the district advised
18 plaintiffs in advance that they intended to produce that
19 data once it became available, we would have been happy to
20 work with them on it. But instead they produced it late, in
21 violation of Rule 37, so for that reason, we would ask that
22 it be excluded. But should the Court find that it must come
23 in, we would respectfully request that plaintiffs be
24 permitted to submit a supplemental expert report on that
25 data at some time that permits the plaintiffs' expert,

1 Dr. Frankenberg, adequate time to analyze and prepare that
2 report. And we would, you know, associated to that, ask
3 that posttrial briefing be pushed until after that
4 supplemental report is submitted.

5 THE COURT: If you will -- I should have done this
6 before we got going. If you'll introduce yourself for the
7 record and have your co-counsel introduce herself as well.
8 I'm sorry.

9 MS. FELDKAMP: Sure. Katrina Feldkamp for the
10 plaintiffs, Your Honor.

11 MS. HOLMES: And Jennifer Holmes for the plaintiffs.

12 THE COURT: All right. Thank you both.

13 And then counsel for the district, if you can
14 introduce yourselves for me.

15 MR. HOOKS: Good morning, Your Honor. I'm John Hooks
16 for the school district, and I'm here with paralegal Jamie
17 Dole.

18 THE COURT: All right. Good morning.

19 MR. GRIFFITH: Ben Griffith for the district with
20 Freddie Harrell for the district as well.

21 THE COURT: All right. Thank you. And?

22 MR. MEYERS: For the United States, I'm Max Meyers.

23 THE COURT: All right. Thank you, Mr. Meyers.

24 Ms. Feldkamp, so tell me with respect to the
25 2025-2026 faculty-student data what additional information

1 has been provided that you contend is untimely.

2 MS. FELDKAMP: There have been hundreds of data
3 entries on student enrollment data and on faculty and staff
4 assignment data. The faculty and staff data in particular
5 is provided in a format that is different than the data the
6 district has previously provided. It would require a bit
7 more time for the plaintiffs to clean and analyze it than if
8 it were presented in a similar format, and that data as a
9 whole must be considered alongside the other data the
10 plaintiffs have received, and it requires our expert some
11 time to look into that and prepare conclusions and, of
12 course, for us to update our strategy accordingly.

13 THE COURT: I can already tell you're a fast talker,
14 and I can see Ms. Crane's head shaking some, so slow down
15 for me a little bit. It helps me process it too. It's
16 okay.

17 MS. FELDKAMP: Absolutely, Your Honor.

18 THE COURT: So on the faculty/staff data, is the last
19 data you would have had, would it have been 2024-2025?

20 MS. FELDKAMP: No, Your Honor. The last data we
21 received before the close of discovery was '23-'24. The
22 district did also untimely produce '24-'25 data but
23 consented to its exclusion in its response to motion 163.

24 THE COURT: All right. Thank you, Ms. Feldkamp.

25 Mr. Hooks, with respect to this 2025-2026 data --

1 well, first, do you agree the 2024-2025, you've consented to
2 the exclusion of that?

3 MR. HOOKS: Yes, ma'am. In an effort to be
4 cooperative, we agreed to exclude that data, but we would
5 like to put the '25-'26 data into evidence, Your Honor.

6 THE COURT: And is there a reason it hasn't been
7 turned over before it was --

8 MR. HOOKS: Yes, ma'am. The data is only for this
9 school district, so it's very new information that has just
10 come into possession of the school district. Also to
11 address, the '25-'26 teacher data is exactly like the data
12 in its format we provided previously. It's just an update
13 to the exhibit. Now, there was backup data that went with
14 that, and, you know, we provided that in an effort to be
15 transparent about where these numbers came from, but in
16 terms of an exhaustive period of discovery and so forth, I
17 don't see that being necessary at all. This is exactly like
18 we always provide, and that's true for student assignment as
19 well, Your Honor.

20 THE COURT: Why did you consent to the exclusion of
21 2024-2025 but not '25-'26?

22 MR. HOOKS: Because, candidly, we have had the
23 previous year information in possession longer. This is
24 what just came into possession more recently. But same
25 thing, Your Honor. The '24-'25 also is nothing complicated

1 or complex. It's just updating the chart in the exhibit
2 that we previously provided in order to get the Court a full
3 overview of the data and what it shows. We would love to
4 have that chart before the Court. This is a public school
5 district, Your Honor, and all the information in the data is
6 available to anybody who wants it. It's no secret. And so
7 we're just here to try to be as forthright and give the
8 Court as much information as we can about the current
9 condition of the assignment for teachers and for students as
10 well, Your Honor.

11 THE COURT: When did you obtain possession of the
12 2025-2026 data?

13 MR. HOOKS: That would have come within the last
14 couple of weeks, just shortly before it was produced, Your
15 Honor. As school has just, you know, gotten under way in
16 the district, Your Honor, it's just begun for this school
17 year, so...

18 THE COURT: All right. Thank you.

19 Anything else, Ms. Feldkamp, on that matter?

20 MS. FELDKAMP: No, Your Honor.

21 THE COURT: All right. The next motion that the
22 Court has is the district's motion to exclude, and it's
23 Docket Number 166, and it relates to three fact witnesses
24 that the plaintiff has disclosed.

25 Mr. Hooks, are you going to take that motion?

1 MR. HOOKS: Yes, ma'am. And this has been fully
2 briefed. I don't know that we've got a lot of additional
3 comments to make, but we would indicate to the Court that
4 these are three witnesses who were not indicated anywhere in
5 discovery that was submitted to the plaintiff. They were
6 not identified, and that discovery was submitted quite some
7 time ago, Your Honor. It was not updated. We were quite
8 surprised to learn about the identity of these three
9 witnesses in the disclosure on September 8th.

10 And as the Court is well aware, the plaintiffs had
11 criticized the district for submitting the name of one or
12 two witnesses on the 8th and even brought a motion to
13 exclude them, including a witness that was widely known to
14 the plaintiffs who is the superintendent of the school
15 district, so in an effort, again, to be cooperative, we
16 decided to modify our program -- our presentation to exclude
17 those witnesses from our own presentation, and yet what's
18 good for the goose apparently is not good for the gander.
19 The plaintiffs want to continue on with witnesses that were
20 not disclosed at all and not known to the defendant. So for
21 that reason, we would ask they be excluded.

22 THE COURT: All right. Ms. Feldkamp?

23 MS. FELDKAMP: Yes, Your Honor. Plaintiffs oppose
24 defendants' characterizations, and these witnesses are
25 distinguishable from plaintiffs' motion. So first, contrary

1 to the characterizations in defendants' motions, plaintiffs
2 did reach out over the weekend to attempt to provide
3 justification for not previously identifying those witnesses
4 and also explained how each witness's testimony will assist
5 the trier of fact and, in the interest of collaboration and
6 collegiality, described what the contents of that testimony
7 would be.

8 To sum up, plaintiffs did not become aware of one of
9 the fact witnesses, Ms. Ma'Kesha Adams, until August 15th,
10 2025, and only learned of her relevant knowledge the
11 subsequent week. Plaintiffs were aware of the Bushes,
12 Ms. Nadira and Ms. Tagirah Bush, prior and do take
13 responsibility to the Court and to defendants for not
14 disclosing the identities of those witnesses earlier;
15 however, the harm to the defendants is much less and
16 plaintiffs would maintain is not prejudicial because these
17 are nonparty witnesses. The Bushes, for example, reside
18 more than 100 miles away, outside of the limit for
19 subpoenas, which is stricter for nonparty witnesses.

20 In addition, the witnesses' testimony will all assist
21 the Court. They will be testifying about their experiences
22 with *Green* factors that will be the subject of this week's
23 hearing. Given that this testimony has value for the Court,
24 it is not prejudicial to the district, we request that all
25 three witnesses be permitted to testify. However, should

1 the Court decide to exclude them, we would ask that they be
2 permitted to give either oral or written public comment at
3 some point before the conclusion of the hearing.

4 THE COURT: With respect to Adams, you said that you
5 didn't know about Adams until August 15th, and you said that
6 you knew of the Bushes before that. When were you aware of
7 the Bushes and the relevant testimony? You know -- one at a
8 time. Y'all can't tag team me. Y'all both get a chance, I
9 promise.

10 MS. HOLMES: Your Honor, may I answer this question?
11 I don't think my counsel knows the answer.

12 THE COURT: You may.

13 MS. HOLMES: Your Honor, we were aware of the Bushes
14 I think around 2020. They then subsequently moved out of
15 the district, and we hadn't been in contact with them for
16 many years. And so I believe in the past year we were in
17 contact with them to see if they had any information
18 relevant to the trial now. But these are a parent and a
19 student who -- or a former student who used to go to school
20 in Rankin County and, you know, want to share their personal
21 experiences when they were in the district. But, you know,
22 that delay was because they had moved out of the district to
23 Atlanta and we were out of touch for that period.

24 THE COURT: And then when were you made aware that
25 they would be available to testify as witnesses?

1 MS. HOLMES: They agreed to testify last month, and
2 I --

3 THE COURT: Do you recall when last month?

4 MS. HOLMES: I'm sorry. I don't know exactly when
5 they agreed, but I think we've been in touch since early to
6 mid August.

7 THE COURT: So around the same time as the Adams --
8 Ms. Adams?

9 MS. HOLMES: Yes, Your Honor. The distinction is we
10 did -- we were aware that they existed before we -- in a way
11 that we didn't know Ms. Adams at all until August 15th.

12 THE COURT: So around mid August you would have been
13 aware that these three individuals were willing and able to
14 testify. Is there a reason -- and either one can answer.
15 Is there a reason that the plaintiffs did not -- a couple of
16 things.

17 Is there a reason that the plaintiffs did not contact
18 the parties and the Court to say we've identified some
19 witnesses, we know that our discovery deadline has run, but,
20 Court, we feel like these are critical witnesses and you
21 need to hear from them? Is there a reason that approach
22 wasn't taken versus just adding them to a witness list
23 without disclosure?

24 MS. FELDKAMP: It was not until late August that we
25 were certain Ms. Adams had relevant knowledge that would

1 provide the basis for testimony, but plaintiffs should have
2 included that in supplemental disclosures. We did, however,
3 include it in our timely witness list.

4 THE COURT: Okay. And I'm not going to just beat up
5 on you and Ms. Feldkamp either. The district, at least, has
6 withdrawn their witnesses that had not been disclosed, but
7 to both sides, I forget whose response or whose motion,
8 there have been citations to the federal rules about these
9 witnesses had to be identified by pretrial disclosures.

10 Our local rules require that if you're going to call
11 someone as a witness, they have to be disclosed by the
12 discovery deadline, and my practice, not just in these types
13 of cases but all cases, if you have not disclosed an
14 individual -- I know there's certain factors that the Court
15 has to consider whether they get to testify or not, but one
16 of the factors is about the reason for the untimely
17 disclosure.

18 I don't have to flesh that out with the district
19 because they have withdrawn who they are trying to call.
20 But my plan, had they not done that before I saw their
21 response to withdraw them, was to exclude those witnesses,
22 and so it's only fair -- I'm looking at the plaintiffs'
23 motion to exclude the district's witnesses, and if I use
24 your case law against you, your case law talks about trial
25 by ambush and how it's just not fair to the other side to

1 call witnesses that they're not aware of. They may or may
2 not have wanted to depose them, the same way that y'all may
3 or may not have wanted to depose their witnesses that you
4 were unaware of, but it's just in the interest of fairness
5 both sides disclose within the discovery deadline or the
6 witnesses are excluded.

7 So the Court, with respect to the plaintiffs'
8 witnesses, I do -- I think that I have to look at whether
9 the other side has been prejudiced. They didn't have an
10 opportunity to even know the names until September 8th, and
11 they didn't have an opportunity until September 14th to know
12 the summary of the testimony, which was -- today, for the
13 sake of the record, is the 16th. So I am going to exclude
14 the testimony of those witnesses. I will, however,
15 Ms. Feldkamp, allow the individuals, when -- if there are
16 any other members of the public that wish to comment, I will
17 allow them -- even though they have missed their objection
18 and comment period, I will allow them to say what they want
19 to say, but their time will be limited like any other
20 commenter or objector. So it's not going to be a full-blown
21 witness testimony like it would be for a typical fact
22 witness.

23 MS. FELDKAMP: Understood, Your Honor. Because --
24 oh.

25 THE COURT: No, it's okay. Go ahead.

1 MS. FELDKAMP: Because those three witnesses are not
2 present today, would they be permitted to provide limited
3 oral comment some other day this week?

4 THE COURT: When did you intend to call them?

5 MS. FELDKAMP: On Wednesday or Thursday. But we can
6 make arrangements, you know, per the Court's preferences.

7 THE COURT: Maybe I'm optimistic, but I don't see us
8 going into Thursday. I think that we're going to -- picking
9 a jury and we don't have to do all of those things. We
10 usually get through witness testimony pretty quickly, and so
11 if you can have them here on Wednesday, then I will
12 entertain that.

13 MS. FELDKAMP: Understood, Your Honor.

14 THE COURT: All right. Thank you. You may be
15 seated.

16 Mr. Hooks, with respect to Ms. Feldkamp's request
17 about the 2025-2026, if the Court does consider that
18 information, I'm not going to continue the hearing. We're
19 going forward this week. I think this is an issue that
20 needs to be dealt with for both sides' clients and in the
21 interest of the public, but what's the district's position
22 as to whether posthearing that their expert can have an
23 opportunity to provide something to the Court on that
24 additional information?

25 MR. HOOKS: Your Honor, I don't think we have a

1 problem with that.

2 THE COURT: Okay.

3 MR. HOOKS: I am confident the data is
4 noncontroversial. It's just an update to the previous
5 exhibit.

6 THE COURT: And, Ms. Feldkamp, if the Court allows
7 that where -- I still want to set -- we discussed deadlines
8 of the findings of facts and conclusions of law, and so
9 maybe it's something we can discuss further later after you
10 have an opportunity to consult with your expert about how
11 long -- you said it's a man, male?

12 MS. FELDKAMP: It's Dr. Erica Frankenberg.

13 THE COURT: Erica. Okay. -- how long she may need
14 to look at that information, but once you have that
15 opportunity, we can take this back up again. All right?

16 MS. FELDKAMP: Understood, Your Honor. And we'll let
17 you know when we've had the opportunity to consult with her.

18 THE COURT: Thank you so much. All right. What else
19 do we need to take up? You said maybe some other pretrial
20 matters?

21 MS. FELDKAMP: Plaintiffs have two other pretrial
22 matters we'd like to raise. The first, we would like to
23 respectfully request that the Court take judicial notice
24 pursuant to Federal Rule of Evidence 201 of the schools in
25 the Rankin County School District that were reserved for

1 White students and that were reserved for Black students
2 under de jure desegregation. Plaintiffs have a number of
3 pieces of evidence that we can provide in support of that
4 request. I'm happy to review it with you, but the list that
5 we submit for the Court's consideration can also be found in
6 the complaint to this case. It lists as the de jure Black
7 schools McCall, Carter, Goshen Phenon, and McLaurin; and as
8 the de jure White schools Brandon, Florence, Pearl,
9 Pelahatchie, Pisgah, Puckett, and Richland.

10 Plaintiffs have reached out to the parties to attempt
11 to address this via a joint stipulation. We were not able
12 to agree upon a stipulation before this morning's appearance
13 but have been exchanging communications on this point. I,
14 of course, do not want to speak for opposing counsel, but we
15 have not received an alternative list or any disputes to the
16 list that we have proposed. I'm happy to provide the
17 underlying information we submitted as a part of this motion
18 when you're ready.

19 THE COURT: Okay. Any response from the district?

20 MR. HOOKS: Your Honor, we received a request from
21 opposing counsel to make this point a stipulation and, after
22 considering it, decided not to. There are reasons for that,
23 and one is the purpose of this hearing. This district has
24 so effectively eliminated the former de jure system that our
25 witnesses, even some of whom have been at the district a

1 very long time, are unable to determine which of the schools
2 are part of the former de jure system.

3 Also, the district court has reconfigured attendance
4 zones extensively in this district. There has been quite a
5 bit of construction and renovation that's gone on over the
6 years, all of which has been approved by this court,
7 including the siting and locating of the schools, which is
8 no longer at issue before the Court, having been declared
9 unitary in that regard, so, Your Honor, we are not at all
10 trying to be difficult. We simply are unable to stipulate
11 to that because no living person I'm aware of has access to
12 that information, Your Honor. We simply don't know.

13 THE COURT: Any other comment on that, Ms. Feldkamp?

14 MS. FELDKAMP: Yes, Your Honor. First, the facts and
15 the history of which schools were de jure desegregated
16 are -- there are factual records we can point to, and that
17 history looms large in this case. It is the basis for the
18 original orders in this case.

19 If it's helpful to Your Honor, at this time I can
20 review the underlying information we submit for judicial
21 notice.

22 THE COURT: So obviously I'm not educated on any of
23 this yet, so I can't rule on it at this moment, and I would
24 like to be able to get into the hearing itself and the
25 testimony. I think there's two options. Through your

1 witnesses -- if they're not going to stipulate, they're not
2 going to stipulate, so your option is to prove it up, prove
3 up whatever issue you want me to take judicial notice of;
4 or, two, posthearing through a brief, you can ask the Court
5 to take judicial notice of this point.

6 So either approach works for me. Whatever -- I mean,
7 it's your position, so I want you to handle it however you
8 feel most comfortable, but I think those are your two
9 options is either through your witnesses prove up this
10 point, or if you think the proper approach is to ask the
11 Court to take judicial notice of this, then you can do that
12 I think with posttrial briefing. We can set a deadline for
13 that.

14 MS. FELDKAMP: Understood. Thank you, Your Honor.
15 And there is one additional pretrial matter the plaintiffs
16 would like to raise. Plaintiffs move to strike the written
17 comments of four current and former district administrators
18 and also to exclude them if they intend to offer oral
19 comment today, or at least to limit that comment to personal
20 comment. Those four individuals are Andrea Payne, Amanda
21 Clark, Sue Townsend, and Scott Rimes.

22 Ms. Payne and Ms. Clark are current administrators in
23 the district. Ms. Townsend and Mr. Rimes both previously
24 served as superintendent of the district, the key designee
25 to speak on behalf of the district, with Mr. Rimes having

1 done so during the key years at issue in this week's
2 hearing, and as this court will recall, defendants
3 previously noticed their intent to call Mr. Rimes as a
4 witness, but his testimony has now been excluded.

5 Each of these individuals submitted public comments
6 where they make representations as employees and agents of
7 the district, including by offering improper legal
8 conclusions as to whether the district has complied in good
9 faith or demonstrated continuous progress. Ms. Clark and
10 Ms. Townsend in particular draw conclusions based on
11 district data but offer no basis for those conclusions or
12 information about the data they're relying on. We are,
13 therefore, moving to strike those comments as more
14 prejudicial than probative.

15 Testimony offered by district employees and agents,
16 particularly those currently employed, about the district's
17 compliance with the desegregation orders, gets directly to
18 the heart of key issues at this litigation, and so
19 consistent with the conversations we've been having about
20 excluding testimony by surprise witnesses, we think it is
21 not appropriate for the district to be able to benefit
22 from -- unjustly from testimony that makes an end run around
23 the federal rules requirements.

24 We would, therefore, ask that their written comments
25 be stricken, and should they desire to present oral comment,

1 that that be limited to their experiences of parents of
2 children who currently or formerly attended the district or
3 as community members but not as employees.

4 THE COURT: Okay. Any response?

5 MR. HOOKS: Your Honor, the deadline for submitting
6 comments was September the 2nd. This is the first we've
7 heard of any concern about these commenters. There's been
8 no motions filed, and as the Court is well aware, opposing
9 counsel have no problem in submitting written motions to the
10 Court. But here we are on the morning of the hearing and
11 just now hearing about objections to these commenters.

12 Your Honor, we are confident that the data will show
13 this district is unitary. We have no qualm about that, no
14 concern about it.

15 The comment forms that have been submitted will not
16 be accompanied by live witnesses. We do not anticipate
17 having Dr. Townsend or Dr. Rimes, for example, come before
18 the Court, but nevertheless, their comments should be front
19 and center before the Court. Two of these are former
20 superintendents at the school district, Your Honor, and
21 they're testifying about some of the things that they've
22 done in complying with Court's orders and about, as far as
23 they know, the intentions of the school district to continue
24 with the good faith obligations and commitments of the
25 Court's orders. So I see no reason not to have these before

1 the Court, and I certainly think if, in fact, there was a
2 legitimate concern about them, that the time to have raised
3 those concerns was earlier.

4 Also, there's nothing among the instructions from the
5 Court that would indicate that former or current employees
6 of the district cannot submit comments along these lines.
7 They're not excluded. That could have been taken up before
8 the Court at a much earlier time as part of the instructions
9 regarding who can submit a comment and who cannot.

10 Your Honor, I think it's very unfair for opposing
11 counsel to get here on the morning of the hearing and to try
12 to disqualify the comment forms that have come in simply
13 because they reflect favorably on the school district and
14 its progress toward unitary status.

15 THE COURT: Thank you, Mr. Hooks.

16 Anything else, Ms. Feldkamp?

17 MS. FELDKAMP: Yes, Your Honor. We received the
18 comments one week ago, and we are raising this motion now
19 because prior to today we did not have the full opportunity
20 to review those comments given trial preparation and the
21 motion practice we had to engage in last week. Certainly if
22 the district thought this testimony needed to be before the
23 Court, could have disclosed these individuals, which -- all
24 of whom are well known to the district, before the close of
25 discovery.

1 In addition, if the district is only -- if these
2 commenters are only providing written comment, we would have
3 concerns about that comment not being sworn. And while the
4 form certainly does permit and encourage the testimony of
5 employees, there is a distinction between teachers, who are
6 certainly the subject of many aspects of this order, and
7 individuals who could be deemed agents of the district, and
8 we think that distinction is important.

9 THE COURT: All right. I'm going to deny the
10 plaintiffs' request to strike those object and comment
11 forms. The Court will take into consideration who is the
12 writer of the form when I consider it and whether they're a
13 current or former employee of the district and whether that
14 may lend to any bias or things like that. So the Court
15 considers that as to each and every form as to who the
16 individual is and what perspective they're coming from.

17 But as Mr. Hooks noted, in the objection and comment
18 form, I didn't indicate that any current or former employee
19 of the district could not submit a comment form, so I don't
20 think it's appropriate for me to strike them just on that
21 basis alone, but also I'll keep into consideration when
22 considering it what their basis of knowledge is and what
23 perspective they may be coming from, if that makes sense.

24 Anything else, Ms. Feldkamp, that I need to take up
25 before we get going?

1 MS. FELDKAMP: Nothing further from plaintiffs, Your
2 Honor. Thank you.

3 THE COURT: All right. Thank you.

4 Mr. Hooks, anything from the district?

5 MR. HOOKS: Nothing from the district, Your Honor.

6 THE COURT: All right. Are both sides ready for
7 opening?

8 MR. HOOKS: Yes, Your Honor.

9 MS. FELDKAMP: Yes, Your Honor.

10 THE COURT: And I think we decided 30 minutes per
11 side? Okay. If anybody wants less, feel free to take it.
12 Just not more. And I will give both sides a five-minute
13 warning when you're running up on your time.

14 And, Ms. Feldkamp, we will start with you.

15 MR. HOOKS: Your Honor, I think we had decided the --
16 you had decided, rather, the district would go first since
17 it's the movant.

18 THE COURT: We did, and my law clerk reminded me of
19 that this morning, and I already forgot, so I'm sorry.

20 All right. You may proceed, Mr. Hooks.

21 MR. HOOKS: Good morning, Your Honor. May it please
22 the Court?

23 My name is John Hooks, and together with my
24 co-counsel, Freddie Harrell and Ben Griffith, and our
25 paralegal, Jamie Dole, we are honored to represent the

1 Rankin County School District, who comes before the Court to
2 prove it operates one unitary school system for all students
3 regardless of race and has eliminated the vestiges of the
4 old segregated system to the extent practicable.

5 Your Honor, when the Rankin County schools began this
6 journey toward unitary status some five decades ago, few
7 could have imagined the scale of the modern school system or
8 its degree of success. In the early 1970s, the Rankin
9 County schools had fewer than 10,000 students, who attended
10 11 attendance centers. Today the Rankin County School
11 District is the state's second largest public school system
12 with over 18,000 students. And with more than 2,800
13 employees the district is the county's largest employer.
14 The district serves urban, suburban, and rural areas with 28
15 school locations, and all schools are thriving academically
16 and are routinely designated by the Mississippi Department
17 of Education as successful school.

18 Your Honor, in 1955 the United States Supreme Court's
19 decision in *Brown versus Board of Education* held that school
20 districts across America could no longer maintain separate
21 school systems based on race. The court further defined its
22 mandate to desegregate schools through additional decisions,
23 including *Green versus New Kent County School Board* in 1968,
24 holding that a school system must show proof of fulfilling
25 its desegregation obligations by examining the following

1 areas: student assignment, faculty assignment, staff
2 assignment, extracurricular activities transportation, and
3 facilities. These areas of inquiry are commonly referred to
4 as the *Green* factors and continue to provide the basic
5 framework for determining if a formerly dual system has
6 completed its journey to unitary status.

7 Over the intervening six decades, the Supreme Court
8 and lower federal courts have provided more guidance for
9 schools in navigating their journey toward complying with
10 their desegregation obligations. Three key concepts are
11 important here.

12 First, as the Supreme Court said in *Dowell*,
13 desegregation plans like the one in this case were designed
14 as temporary measures, never intended to operate in
15 perpetuity. In fact, the Supreme Court has repeatedly
16 recognized that returning schools to the control of local
17 authorities at the earliest practicable date is essential to
18 restore their true accountability in our governmental
19 system.

20 Second, a federal court's jurisdiction is limited and
21 must be specifically deployed only to remedy an ongoing
22 constitutional violation. A remedy is justifiable only
23 insofar as it advances the ultimate objective of alleviating
24 the initial constitutional violation. For example, a former
25 dual school system is not required to endlessly adjust

1 geographic attendance zones to accommodate demographic
2 changes naturally occurring over time. Because shifting
3 demographics is not a product of the former de jure system,
4 there is no constitutional violation to remedy.

5 Third, perfection is not the standard in a unitary
6 status case. Rather, the standard is whether a school
7 district has eliminated the former dual system and its
8 vestiges to the extent practicable. Indeed, federal courts
9 have explicitly rejected notions of maximum desegregation
10 and have eschewed inconvenient and bizarre measures to
11 achieve perfect racial balancing.

12 Here, the Rankin County School District's journey
13 toward unitary status began more than six decades ago, in
14 the late 1960s, after several students and their families
15 brought this case to desegregate the school district. This
16 court implemented a desegregation plan through a series of
17 court orders beginning in 1970 and later clarified and
18 expanded by additional orders, most importantly those from
19 1973, 1978, 2012, and 2019.

20 As the Court will see, the early orders from the
21 1970s largely dealt with implementing and effecting the
22 desegregation of the district and specifically dealt with
23 questions of which schools the district would operate and
24 how the district would reassign existing students and
25 faculty to those schools.

1 Some of these early orders also dealt with a
2 municipal school emerging in the 1970s within the county
3 system: the Pearl municipal schools. Issues relating to
4 Pearl's remaining desegregation obligations are not before
5 the Court. Also not before the Court, Your Honor, are two
6 *Green* factors: transportation and facilities. This is
7 because the 2019 order granted partial unitary status for
8 the district in these important areas.

9 What's also significant about the 2019 order is that
10 it shows the Department of Justice and private plaintiffs
11 have actively monitored the district's compliance with prior
12 orders of the Court. The DOJ, for example, conducted a site
13 visit in May of 2016 to many of the district's schools over
14 a five-day period, and the Department of Justice and private
15 plaintiffs also conducted a site visit of district schools
16 over a four-day period in May of 2019. In the ensuing
17 years -- I'm sorry, May of 2018.

18 In the ensuing years, Your Honor, there have been
19 thousands of data points, charts, spreadsheets, pages of
20 information, and narrative responses provided by the school
21 district to the DOJ and private plaintiffs. Every nook and
22 cranny of the district's operations has been carefully
23 examined and explored by counsel from the Department of
24 Justice and the Legal Defense Fund.

25 At no time did the DOJ or plaintiffs come before the

1 Court to enforce any aspect of the Court's orders. To the
2 contrary, as a product of these site visits and data
3 submissions, the DOJ's own field attorney assigned to this
4 case, Mr. Chris Awad, strongly encouraged the district to
5 continue its efforts toward unitary status on all remaining
6 *Green* factors.

7 Thus following the entry of the Court's 2019 order
8 partially declaring the district unitary, the district
9 continued its journey toward fully satisfying its remaining
10 desegregation obligations, even in some instances
11 specifically adopting suggestions offered by the DOJ itself.

12 Your Honor, the district will demonstrate compliance
13 with the remaining *Green* factors by showing with regard to
14 student assignment the district has long complied with the
15 Court's requirements. The 2012 order requires each of the
16 district's individual schools to be within a deviation of
17 plus or minus 20 percentage points of the district-wide
18 average of all Black students and for all White students.

19 The testimony will show that requiring this deviation
20 for both Black and White students as opposed to Black
21 students' deviation alone reflects a stringent standard not
22 commonly seen in desegregation cases. Nevertheless, by the
23 time of the 2012 order, the district had long complied with
24 both Black and White deviations of 20 percentage points for
25 at least the preceding ten years and would continue to

1 achieve perfect compliance with both deviations for the five
2 consecutive school years following entry of the 2012 order.
3 Altogether, the district achieved perfect compliance with
4 this standard for at least 15 school years between 2002 and
5 2017, a fact the LDF has not reckoned with in any of its
6 analysis.

7 Along the way, the demographics of the district began
8 to shift showing an overall trend toward greater racial
9 diversity with a decline in percentage of White students; a
10 steady increase in the percentage of Black students; and a
11 dramatic increase in the number of Hispanic, Asian, and
12 students of other races. Of course, these shifting
13 demographics have caused some schools to wobble slightly in
14 and out of strict compliance with the plus or minus 20
15 percent standard, but usually by no more than a point or two
16 and usually precisely because of changing racial
17 demographics or other patterns of residential and commercial
18 growth and development.

19 No schools are racially segregated or racially
20 isolated because none is composed of students who are mostly
21 of one race, and none is racially identifiable because even
22 schools drifting out of the perfect racial balance often do
23 so by a point or two and sometimes because they actually
24 become more, not less, racially diverse on account of
25 increased enrollment of Hispanic and other students.

1 The main point regarding student assignment, Your
2 Honor, is that the district has complied with the Court's
3 requirement for many years perfectly, and to the extent
4 slight imperfections have emerged now and then, they are
5 attributable to demographic forces that have nothing to do
6 with the former de jure system and over which the Board of
7 Education has no control.

8 Your Honor, it's as though the plaintiffs have asked
9 the Court to put on a number -- or blinders to not see a
10 number of important factors, and one has to do with the
11 Supreme Court's own precedent that has said racial balancing
12 cannot be pursued for its own sake. Even in this very
13 court, Judge Lee, in considering a neighboring school
14 district's motion for unitary status, considered the fact
15 that the Madison County School District had not achieved
16 perfect compliance with its standard deviation required by
17 the Court with regard to student assignment and nevertheless
18 found that district unitary.

19 Other examples of school systems declared unitary are
20 also useful and will be put before the Court. And, in fact,
21 Judge Lee looked at an analysis very similar in reaching his
22 conclusions in the Madison County case, in fact from the
23 very same witness who will appear before the Court,
24 Dr. Christine Rossell.

25 Your Honor, the plaintiffs also ask the Court to

1 ignore the standard here. Again, the standard is not
2 perfection, and before the Court is an uncommonly good
3 example of a school system that has so successfully
4 reinvented itself that the old dual system is practically
5 unrecognizable, even by folks who have spent decades in the
6 Rankin County Schools.

7 Not only is the district proud of its record of
8 racial diversity throughout its schools in terms of student
9 enrollment, the district is proud of its academic programs
10 and that they're open and accessible by all of its students
11 regardless of race. This includes the district's advanced
12 placement and dual college credit programs as well as the
13 district's gifted programming.

14 Although not specifically mentioned in the
15 desegregation orders, the district will also bring before
16 the Court information regarding the nonracial administration
17 of its student discipline program.

18 Your Honor, also important regarding faculty and
19 staff, the evidence will show that unlike student
20 assignment, the court orders do not impose specific racial
21 quotas or targets at each school. However, most schools are
22 within a deviation plus or minus 20 percentage points,
23 applied here because that was the standard applied for the
24 student analysis, or even a more stringent plus or minus 15
25 percentage points of the overall racial makeup of teachers

1 of the district as a whole. The district is proud of its
2 record in hiring and retaining diverse teaching faculty,
3 especially considering America's and Mississippi's critical
4 teacher shortage.

5 Third, the district will also demonstrate that its
6 extracurricular activities are open to all students
7 regardless of race and that the district enjoys a high level
8 of racial diversity among its extracurricular offerings.

9 And finally, throughout the district's presentation,
10 the Court will hear about the Rankin County Schools' good
11 faith commitment to carrying out these obligations and its
12 plans for continuing the journey. Actively working to
13 secure all students -- or to serve all students has become
14 an integral part of the district's recipe for success.

15 The Court will hear about exciting state-of-the-art
16 technologies the district deploys to make sure no kiddo
17 falls through the cracks but also to make sure every student
18 is successful. "All" in this district means all.

19 Your Honor, the district acknowledges the debt of
20 gratitude it owes to the private plaintiffs whose courage
21 and conviction to end state-sanctioned de jure desegregation
22 is in large part why we're here today. The district must
23 also acknowledge its obligation under federal law not just
24 to journey toward unitary status but to arrive there.

25 As the Supreme Court has said, federal consent

1 decrees are not supposed to exist forever, and the Supreme
2 Court's latest pronouncements in *Parents United* and the
3 Harvard admissions case confirm that educational
4 institutions are not free to endlessly pursue certain
5 race-based remedies unrelated to actual constitutional
6 violations.

7 In conclusion, every day parents, students, teachers,
8 administrators, clerks, cooks, coaches, bus drivers, nurses,
9 and many others wake up and give their best in a school
10 system that is more racially diverse than ever and has
11 achieved more success in its efforts to desegregate its
12 schools than many other school systems already declared
13 unitary. This journey belongs to the people who have made
14 the journey possible. They deserve to celebrate this
15 achievement, they deserve to attend schools that are not
16 just fully desegregated in fact but are fully desegregated
17 in law. This is why we ask this court to declare the Rankin
18 County School District unitary and to formally dissolve all
19 orders and injunctions in this case.

20 Your Honor, the record will show after six decades of
21 journeying, the Rankin County School District has arrived.

22 Thank you.

23 THE COURT: Thank you, Mr. Hooks.

24 Ms. Feldkamp?

25 MS. FELDKAMP: Good morning, Your Honor.

1 THE COURT: Good morning.

2 MS. FELDKAMP: Katrina Feldkamp on behalf of the
3 plaintiffs, Black schoolchildren who attend Rankin County
4 Schools. May it please the Court?

5 Last year the Rankin County School District asked
6 this court to find that it has eliminated the vestiges of
7 de jure segregation in four key areas, student assignment,
8 including classroom and in-between school assignment;
9 faculty and staff assignment; and extracurricular
10 activities, three factors that the Supreme Court said in
11 *Swann* are among the most important indicia of a segregated
12 system. Lastly, the district moved for unitary status in
13 quality of education specifically in the area of student
14 discipline, a factor in which the Court noted its continuing
15 jurisdiction in 2019.

16 The district is subject to the continuing
17 jurisdiction of this court until it eradicates those
18 vestiges of segregation. Jurisdiction continues until the
19 district meets its burden. Now, the district bears two
20 significant burdens in these proceedings, burdens they
21 cannot meet. First, the district must demonstrate good
22 faith compliance with the Court's decrees, including
23 multiple consent orders in this case, for a reasonable
24 period of time.

25 Now, there's two key points there. Perfection is not

1 required, contrary to counsel's characterizations, but good
2 faith compliance is; and, second, that the district must
3 actually demonstrate but not simply promise good faith
4 compliance as required by *Fisher versus Tucson*. Those
5 consent orders were adopted in 1970, 1973, '78, 2012, and
6 2019 to vindicate the rights of plaintiffs and ensure that
7 they are not treated as less than other students or subject
8 to the continuing stain of segregation.

9 Second, the district bears the burden to prove that
10 it has taken all steps necessary to eliminate the vestiges
11 of segregation and eliminate them root and branch.

12 I will discuss each of the four factors at issue in
13 these proceedings, highlighting the evidence that the Court
14 will hear from experts, fact witnesses, and the district's
15 own staff. I will begin with student assignment, including
16 classroom assignment; and I will then move to faculty
17 assignment; followed by student discipline and
18 extracurriculars.

19 For each area, I will outline the district's
20 inability to carry its burden in this case, and as I do,
21 three patterns will become clear:

22 First, rather than engaging in good faith compliance
23 as required, the district requires on discretionary
24 practices, not mandatory policies, and unfulfilled promises
25 of implementation.

1 Second, the district has in many instances failed to
2 engage in good faith compliance because of its untested
3 assumptions that such compliance is not worth its time.

4 Third, because of the district's failure to comply
5 with the applicable orders, we continue to see ongoing and
6 persistent racial disparities in all four of the areas
7 before the Court in these proceedings.

8 First I will discuss student assignment. Now, the
9 district has failed to comply with the requirements of the
10 consent orders pertaining to school assignment, including
11 classroom assignment. The district agreed in the 2012 order
12 that the percentage of Black students and the percentage of
13 White students at each school should not deviate more than
14 20 percent from the overall district percentage. But the
15 evidence will show that the district has failed to abide by
16 its own agreement and eliminate perhaps the most shameful
17 vestige of de jure segregation: Segregation and student
18 assignment. The Court will hear from both plaintiff expert,
19 Dr. Erica Frankenberg, and the district's own expert,
20 Christine Rossell, but in the last three years, six schools
21 have had racially identifiable student bodies, in violation
22 of that requirement. This is especially alarming because as
23 plaintiffs will later move for the Court's consideration,
24 many of the schools that are currently identifiably White
25 were previously open only to White students during de jure

1 segregation. Dr. Frankenberg will also testify that in
2 addition, segregation in district schools has not improved;
3 it has worsened. In fact, the district's own expert
4 analysis shows that the racial disparities in student
5 assignment are just as bad or worse than they were 50 years
6 ago.

7 The Court will also hear how the district has failed
8 to eradicate vestiges of segregation in another area of
9 student assignment that counsel has not addressed:
10 enrollment in gifted and talented programs. Dr. Frankenberg
11 will testify that approximately 22 percent of the district's
12 students are Black, but the Court will also hear that in
13 both the 2021-'22 and 2022-'23 school years, Black students
14 comprised just 12.5 percent of students enrolled in the
15 Venture program, one of the district's gifted and talented
16 offerings, and that in some schools there are zero Black
17 students enrolled in that program.

18 The Court will also hear that during the 2022-'23
19 school year, the district enrolled zero Black students in
20 the advanced placement English programs at two high schools.

21 Finally, the Court will hear how the district has
22 failed to eradicate these vestiges because of its reliance
23 on untested assumptions, optional policies, and unfulfilled
24 promises. For example, Dr. Frankenberg will testify that
25 the district has been eligible to use majority-to-minority

1 transfers, also known as M-to-Ms, and that the district
2 could use both M-to-Ms and intradistrict transfers to
3 advance desegregation. But the Court will hear that the
4 district has failed to use those transfers or even offer
5 them and has failed to intervene in intradistrict transfers
6 that had a segregative effect.

7 The Court will also hear testimony that the district
8 has declined to expand policies that could improve the
9 accessibility of the Venture program and that the district
10 does not even track racial disparities in AP enrollment. A
11 poorly implemented practice in one area and a total failure
12 to monitor or conduct compliance in another hardly meets the
13 requirement of good faith compliance for a reasonable period
14 of time.

15 In addition, the district argues that it should now
16 retroactively be declared unitary because of attempts at
17 compliance in the 2000s, but the district entered into
18 consent orders in both 2012 and 2019 after the period that
19 it now cites. It is the law of this circuit pursuant to
20 *Borel versus Saint Martin Parish* in 2012 that entering into
21 a consent order is a recognition by a school district that
22 more is needed before it can be declared unitary. The
23 measure of unitariness must now, therefore, include whether
24 the district has lived up to the obligations of the
25 operative orders since then and the orders that came before

1 them.

2 I'll now turn to faculty and staff assignment. The
3 district has too failed to comply with the requirements of
4 the 1970 and '78 orders, which, among other things, require
5 the district to assign staff such that the ratio of Black to
6 White teachers in each school is substantially the same as
7 across the system. They also require the district to take
8 affirmative steps to ensure Black representation in a wide
9 range of positions across the district, particularly
10 leadership positions, and to ensure that dismissals,
11 demotions, hiring, and promotions are done without regard to
12 race.

13 But the Court will hear that the vestiges of
14 segregation persist across the faculty and staff and that
15 some leadership positions are simply not open to Black
16 faculty. These outcomes violate the 1970 order's
17 requirement that faculty and staff not be assigned in such a
18 way that signals that a school is intended only for White
19 students or only for Black students. For example, the Court
20 will hear from both Dr. Frankenberg and the district's own
21 director of human resources, Ms. Anitra Hollis, that the
22 Black faculty at Puckett Elementary, Pisgah High, McLaurin
23 Elementary, and the Learning Center have deviated from the
24 district-wide percentage by more than 15 percentage points,
25 while Pisgah and Puckett Elementaries have little to no

1 Black staff some years.

2 The Court will also hear how vestiges persist in
3 school leadership. Ms. Hollis herself will share with the
4 Court the alarming number of schools where no Black educator
5 serves as part of the principal and assistant principal
6 team. And the Court will also hear that there are a number
7 of school leadership teams, much larger groups of
8 administrators and educators, that have few or no Black
9 educators.

10 The Court will also hear how, despite the clear
11 mandates of the operative orders in this case, the district
12 has declined good faith compliance because of its own
13 assumptions that such compliance is not worthwhile. For
14 example, the Court will hear that Ms. Hollis is not
15 concerned about the lack of Black representation among
16 principals, assistant principals, and school leadership
17 teams because she assumes that it means they simply did not
18 want to apply.

19 The Court will also hear from Dr. Frankenberg that
20 intradistrict transfers are a practicable and effective way
21 to reduce racial identifiability among faculty. But the
22 Court will hear that the district has not tried to market or
23 incentivize those transfers because some administrators find
24 them offensive. But the Court will also hear that the
25 district has taken no steps to test whether staff would find

1 them offensive or effective.

2 Finally, the Court will hear how the district's
3 response to the faculty mandates of the operative orders
4 ranges from blatant disregard to unfulfilled implementation.
5 For example, the Court will hear that the district must step
6 up its recruitment of Black educators, and Dr. Frankenberg
7 will testify that diversity-focused online educator job
8 boards can help advance this goal. But Ms. Hollis will
9 testify that the district has not even looked for, much less
10 used, listservs, job groups, or message boards dedicated to
11 Black educators to target its recruitment.

12 The Court will hear about partnerships with
13 historically Black colleges and universities and how they
14 can increase recruitment of Black educators. But testimony
15 from the district's own staff will show that the district
16 has underinvested in its partnerships with HBCUs, especially
17 when compared to similar partnerships with a predominantly
18 White university.

19 And the Court will hear from multiple witnesses that
20 it is best practice in hiring to use standard interview
21 questions; evaluate candidates for a given position using
22 the same rubric; and justify a decision to hire a
23 lower-scoring candidate over a higher-scoring candidate,
24 particularly when that decision exacerbates faculty
25 segregation. But the Court will hear from both plaintiffs'

1 expert and district officials that the district does not
2 always follow these best practices and, in fact, that the
3 district has declined to adopt policies that would require
4 that these best practices be used.

5 I'd next like to discuss student discipline. The
6 district is obligated to ensure that students are
7 disciplined in a nondiscriminatory manner. To determine
8 whether a district has eradicated the vestiges of
9 segregation in discipline, courts examine whether there are
10 observed racial disparities in discipline and whether a
11 district has expended efforts to address them. But the
12 Court will hear that such disparities persist in Rankin
13 County Schools.

14 Plaintiffs' expert, Dr. Jamilia Blake, will testify
15 that the district consistently suspends Black students at
16 higher rates than White students. Specifically, her
17 analysis will show that Black students are significantly
18 more likely to be suspended than White students, are
19 suspended more often, and are suspended more severely even
20 when controlling for other school and student
21 characteristics.

22 The Court will also hear from district administrators
23 that exclusionary discipline of Black students has increased
24 in recent years. These types of disparities are exactly the
25 sort that have been recognized by this circuit to indicate

1 that the district has failed to carry its burden.

2 The Court will also hear how the district failed to
3 engage in good faith compliance, instead relying on *ad hoc*,
4 discretionary practices and ineffective and improperly
5 implemented practices that invite more bias instead of
6 mitigating disparities. The Court will hear from district
7 administrators that the district's discipline policies use
8 broad, undefined terms and that the district does not train
9 its faculty or administrators to understand those terms or
10 carry them out objectively.

11 The Court will also hear that the district does not
12 engage in any regular, meaningful analysis of discipline
13 data to determine whether it is violating the applicable
14 orders.

15 Indeed, the Court will hear from Assistant
16 Superintendent Undray Scott that the district actually
17 disregards datasets that show differential, subjective, and
18 arbitrary discipline. And when the district does happen to
19 notice racial disparities in discipline, testimony will show
20 that the district takes no steps to understand or address
21 them. Instead, the Court will hear that the district
22 employs inconsistent *ad hoc* and reactive responses that have
23 led the racial disparities in discipline to worsen. These
24 incomplete measures do not rise to the level of consistent,
25 good faith compliance for a reasonable period of time.

1 Finally, I will preview extracurricular activities.
2 Because of this district's recognized history of excluding
3 Black students from extracurricular activities, the district
4 has been ordered to eliminate vestiges of segregation there.
5 To determine whether a district has carried its burden in
6 this area, courts look at a few things: whether the
7 district affirmatively encourages Black students to
8 participate in extracurriculars, encourages Black teachers
9 to sponsor or coach extracurriculars, and have removed
10 race-based criteria and also facially neutral policies that
11 may foster segregation. The district simply cannot meet
12 this burden.

13 The Court will hear that Black students, coaches, and
14 sponsors continue to be underrepresented in extracurricular
15 activities across the district. For example, the Court will
16 hear that during the 2023-'24 school year, there were at
17 least 43 activities in the district with zero Black students
18 and even more where Black students have been persistently
19 underrepresented. While the district's expert, Christine
20 Rossell, will attempt to testify to the contrary, testimony
21 will show that her calculation methods are unreliable.

22 And the Court will also hear that the representation
23 of Black coaches and sponsors is low throughout the
24 district, but especially at Pisgah and Puckett High Schools.

25 Finally, the Court will hear that the district has

1 not made good faith efforts to comply with the operative
2 orders. For example, the Court will hear how the district's
3 fee waiver for activities, which could be an effective tool
4 for desegregation, is confusing and not often used.

5 Altogether, the evidence presented over the next few
6 days will demonstrate that the district has forgone good
7 faith compliance because of its untested assumptions that
8 that compliance is not worth its time, has relied on
9 discretionary practices and unfulfilled promises of
10 implementation rather than requiring best practices, and has
11 failed to meaningful track and address racial disparities.
12 As such, it cannot carry its burden to demonstrate
13 consistent good faith compliance for a reasonable period of
14 time and eradicate the vestiges of de jure segregation that
15 continue to deny our clients an equal education.

16 Plaintiffs respectfully request that the Court deny
17 the district's motion for unitary status in the areas of
18 student assignment, faculty and staff assignment,
19 discipline, and extracurricular activities.

20 Thank you, Your Honor.

21 THE COURT: All right. Thank you so much,
22 Ms. Feldkamp.

23 All right, counsel. I'm going to give the court
24 reporter about a ten-minute recess. We'll take about a
25 ten-minute recess. The next thing we'll take up are any

1 commenters or objectors that are present and that the Court
2 has received those comments and objections. I circulated
3 those to counsel, so it will be those individuals contained
4 in those documents that the Court will allow to speak today.
5 When we come back in, we'll take that up, and then we'll get
6 into testimony.

7 Court will be in recess for about ten minutes.

8 MS. COSSAR: All rise.

9 (A brief recess was taken.)

10 THE COURT: All right. You may be seated.

11 All right. Counsel, are we aware of any individuals
12 that are here who have presented a comment or objection that
13 would like to speak?

14 MS. HOLMES: Your Honor, there's one gentleman. I
15 believe he's in the hall right now. He did not submit a
16 comment form. He's a current parent of a student at
17 Richland High School, and he's expressed the desire to
18 speak, and we can have someone bring him in if the Court
19 would be willing to hear.

20 THE COURT: I'm going to limit the comment and
21 objections to those who timely submitted comments and
22 objections.

23 MS. HOLMES: Okay. Thank you.

24 THE COURT: But thank you. Anybody else, though,
25 that has timely submitted a comment or objection that wishes

1 to speak?

2 Okay. All right. We'll start with -- the district
3 is going to present their case first, as I understand. Is
4 that right, Mr. Hooks?

5 MR. HOOKS: Yes, ma'am.

6 THE COURT: All right. Who does the district call as
7 its first witness?

8 MR. HOOKS: We call Amanda Stocks, Your Honor. And
9 also, Your Honor, just a programming note, Dr. Stocks will
10 be the district's representative throughout the proceedings,
11 so we ask that she be permitted to remain in the courtroom.

12 THE COURT: All right. Dr. Stocks, if you'll come
13 around for me and go to the witness box.

14 All right. Before we get you sworn in, counsel for
15 the plaintiffs, can y'all just educate me on what's
16 happening, because Ms. Feldkamp disappeared. I've got a new
17 young lady who I've not seen before.

18 Can you introduce yourself for the record.

19 MS. BURRELL: Good morning, Your Honor. We'll be
20 doing a bit of swapping depend on the witness. My name is
21 Ashley Burrell for the plaintiffs.

22 THE COURT: All right. Good morning, Ms. Burrell.

23 MS. BURRELL: Good morning.

24 THE COURT: All right. You may be -- well, if you'll
25 place your left hand on the Bible and raise your right hand,

1 we're going to get you sworn in.

2 (Whereupon, the witness was placed under oath.)

3 THE COURT: All right. And was it Dr. Stocks?

4 THE WITNESS: Amanda, yes, ma'am.

5 THE COURT: If you'll be seated for me.

6 We have a court reporter who's going to take down
7 everything all of us say, so it's very important that when
8 you speak, that you speak loudly, slowly, and clearly. Make
9 sure that the attorneys have finished their questions before
10 you respond. That way there's not any crosstalk.

11 MR. HARRELL: Your Honor, this was our fault for not
12 bringing this up earlier. I thought we had. But we will
13 have Dr. Christine Rossell sitting in the courtroom during
14 the testimony as our expert. We wanted to make sure that
15 was clear with the Court and would be permitted.

16 THE COURT: Okay. Yes. And when we -- during the
17 pretrial conference, I informed the attorneys that the
18 parties have invoked the rule, but that would not apply to
19 any representatives or their experts.

20 MR. HARRELL: Thank you, Your Honor.

21 MR. HOOKS: Thank you, Your Honor.

22 THE COURT: All right. You may proceed, Mr. Hooks.

23 MR. HOOKS: Thank you, Your Honor.

24 **AMANDA STOCKS, Ph.D.,**

25 **having been first duly sworn, was examined**

1 **and testified as follows...**

2 **DIRECT EXAMINATION**

3 **BY MR. HOOKS:**

4 Q. Good morning, Dr. Stocks.

5 A. Good morning.

6 Q. Could you begin by stating your full name for the
7 record, please.

8 A. Amanda Stocks.

9 Q. And how many years have you been in education,
10 Dr. Stocks?

11 A. I'm entering my 29th year.

12 Q. And are you currently employed?

13 A. I am.

14 Q. What is your position of employment?

15 A. Assistant superintendent with the Rankin County
16 School District.

17 Q. And in particular, how long have you been employed
18 with the Rankin County School District?

19 A. Since 2004.

20 Q. And could you give the Court an overview of your
21 various trajectory through the field of education in
22 summary?

23 A. Sure. I started teaching in the Jackson Public
24 School District in 1997. I taught elementary at what is now
25 known as Barack Obama Elementary. I taught fifth grade

1 there and then taught at Duling Hall. That was when that
2 was part of the Jackson Public School District's GED program
3 for in school and out of school. I taught on the in-school
4 side of that program. I taught -- that was a half-day
5 program partnered with the Career Development Center and
6 Jackson Public Schools, so I taught that side of it, and
7 then I went on to the Career Development Center in Jackson
8 public schools and taught School-to-Careers, was the
9 coordinator for School-to-Careers for students there, and
10 then ended up going into administration at Wilkins
11 Elementary in Jackson public schools before coming to the
12 Rankin County School District, where I have been assistant
13 principal, interim principal, principal, human resources
14 director, and in my current position as assistant
15 superintendent.

16 Q. I see. And in your position as assistant
17 superintendent, can you give the Court an overview of what
18 your duties entail?

19 A. I am charged with supporting our 16 elementary
20 schools and our human resources department.

21 Q. And with regard to your educational background, can
22 you give the Court a brief overview of your educational
23 background.

24 A. Sure. I graduated from Raymond High School in Hinds
25 County. I went -- at the time it was across the street --

1 to Hinds Community College, and then on to Belhaven. It was
2 Belhaven College at the time. I believe now it's Belhaven
3 University. That's where I obtained my bachelor's degree.
4 Then I went to Jackson State University for my master's
5 degree, Mississippi State for my specialist, and then my
6 terminal degree through Delta State University.

7 MR. HOOKS: Your Honor, if I may approach the witness
8 with some exhibits from our binders?

9 THE COURT: You may.

10 BY MR. HOOKS:

11 Q. Dr. Stocks, if I could direct your attention to
12 Exhibit Number 12 and ask if you can identify this exhibit?

13 A. This is a map of the Rankin County School District.

14 Q. All right. And is this the same map that we've had
15 posted here on poster board for folks who might be in the
16 courtroom today?

17 A. It is.

18 Q. And did you participate in the preparation of this
19 map?

20 A. I did. I edited it to make sure there were no
21 grammatical errors.

22 Q. So if you could look at the top northeastern portion
23 of the map. Do you recognize this particular school zone?

24 A. That is our Pisgah school zone.

25 Q. Okay. And just as a preliminary matter, even before

1 we get to a description of these individual zones, can you
2 explain to the Court what we mean when we talk about
3 geographic attendance zones?

4 A. Sure. So as far back as, I believe, the 1970 court
5 order around the matter of desegregation of schools in the
6 Rankin County School District, there were geographic zones
7 assigned for students to attend school. Originally I
8 believe there were five zones, and that has evolved over
9 time and over court orders into our current eight school
10 zones. So Pisgah is one of our eight school zones, or as we
11 like to refer to them, one of our communities.

12 Q. I see. And so if you look just beneath or to the
13 south of Pisgah, do we have Pelahatchie?

14 A. That's correct.

15 Q. What's underneath Pelahatchie here?

16 A. Our Puckett community.

17 Q. And then what are the other school zones?

18 A. McLaurin, Richland, Florence, Brandon, and our
19 Northwest zone.

20 Q. Now, we have also in the middle here Pearl, but
21 that's a different school district; right?

22 A. It is.

23 Q. And unconnected to the Rankin County School District;
24 is that right?

25 A. That's correct.

1 Q. So with regard to these various zones, can you give
2 the Court an overview of the type of school configuration
3 that exists per each zone?

4 A. Sure. So going back in the order that we started
5 with Pisgah, Pisgah is a zone that has a pre-kindergarten
6 through sixth grade elementary and a seven through twelfth
7 grade high school.

8 Q. Go ahead.

9 A. Okay. Pelahatchie also has a pre-kindergarten
10 through sixth grade elementary and seven through twelve high
11 school.

12 Puckett follows that same pattern.

13 McLaurin has -- actually follows that same pattern.

14 Richland, Richland zone has a pre-K, first, and
15 second grade school, Richland Elementary. Then at Richland
16 Upper Elementary, which contains grades three through six,
17 and then Richland High, grades seven through twelve.

18 Florence High School has Steen's Creek Elementary,
19 which is pre-K through grades -- pre-K, kindergarten, first,
20 and second grade; Florence Elementary, grades three through
21 five; Florence Middle School, grades six through eight; and
22 Florence High School, grades nine through twelve.

23 Q. Now, are any of the schools in the district or any of
24 the school zones known as title schools?

25 MS. BURRELL: Objection, Your Honor, as to leading.

1 And I would just ask of the witness --

2 THE COURT: You need to stand up when you object.

3 MS. BURRELL: Sorry. Apologies. I would just ask if
4 the witness is going to be testifying to this, that it be
5 introduced as an exhibit.

6 THE COURT: I'm going to overrule the first
7 objection.

8 The second, as to admission, do you want to admit
9 this? I think you do have it as an exhibit.

10 MR. HOOKS: I would, Your Honor. Thank you. I would
11 like to admit this as Exhibit 12 of the district's exhibits.

12 THE COURT: D-12. Any objection?

13 MS. BURRELL: No objection.

14 THE COURT: D12 is admitted.

15 (Defendants' Exhibit 12 entered.)

16 BY MR. HOOKS:

17 Q. Dr. Stocks, what is a title school?

18 A. A Title I school is a school that has a certain
19 percentage of their students receiving free or reduced lunch
20 who are considered socioeconomically disadvantaged by a
21 certain percentage and so therefore there is federal sa*s
22 for that school.

23 Q. And in the school district here in Rankin County, are
24 there Title I school designations?

25 A. There are.

1 Q. And what are those?

2 A. Those are Pelahatchie, Puckett, McLaurin, and
3 Richland.

4 Q. Okay. And when you say "Puckett," do you mean the
5 elementary or the high?

6 A. Just the elementary.

7 Q. I see. And also, another kind of big-picture
8 question: Where does the school district rank in terms of
9 size of its student enrollment relative to other Mississippi
10 school districts?

11 A. Rankin County School District is the second largest
12 district in the state of Mississippi. It is located in the
13 fourth largest county in the state of Mississippi, and it
14 is -- the county is comprised of 775 square miles, but we do
15 not serve the students of the independent Pearl school
16 system that's on our map but not part of the Rankin County
17 School District.

18 Q. I see. And is there something on the map called the
19 Learning Center? What is it and where is it located?

20 A. The Learning Center is the district's -- the campus
21 houses different things, but it also houses our alternative
22 school, our transportation department, our student support
23 services and counseling department, safety and security.
24 Various different things are on that site.

25 Q. I see. And, Dr. Stocks, with regard to the relative

1 travel times in the district, can you give the Court a sense
2 of travel throughout the district?

3 A. If you're in the county seat of Brandon, it may take
4 you 15 minutes to 20 minutes to drive to McLaurin, but it
5 may take you 30 minutes to drive to Pisgah and further if
6 you're going from one corner of the county to the other.
7 It's a pretty large geographic area for all of our 28
8 schools.

9 Q. And are those times, do they fluctuate in the morning
10 time around school?

11 A. Oh, if you're behind a school bus, it's certainly
12 going to fluctuate or car rider line and so forth, working
13 hours. We're the largest employer in our county as well,
14 the Rankin County School District is, so --

15 Q. And let me just ask you a couple of questions of an
16 introductory nature also, Dr. Stocks. Who governs the
17 school district?

18 A. Our school board.

19 Q. And so there's a Board of Education that governs the
20 district?

21 A. That's right. It's --

22 Q. And do those board members appoint a school
23 superintendent?

24 A. The board members themselves are elected. There's
25 five, and they appoint our district superintendent.

1 Q. And currently who is the school superintendent?

2 A. Mr. Shane Sanders.

3 Q. And is he in the courtroom today?

4 A. He is.

5 Q. And when did Mr. Sanders become superintendent?

6 A. July 1st of 2025.

7 Q. And his successor -- or his predecessor was who?

8 A. Dr. Scott Rimes.

9 Q. I see. And the superintendent before Dr. Scott Rimes
10 was who?

11 A. Dr. Sue Townsend.

12 Q. I see. And during your tenure at the district,
13 you've had an opportunity to serve under all three of those
14 individuals?

15 A. I have.

16 Q. And when you served under all three of those
17 individuals, did you participate in any activities or any
18 duties related to the desegregation concerns of the
19 district?

20 A. Yes.

21 Q. All right. And can you give the Court an overview of
22 how many assistant superintendents there are at the
23 district?

24 A. There are currently five assistant superintendents,
25 myself included.

1 Q. And is there a position underneath the super- -- or
2 below the superintendent who supervise activities as well?

3 A. We have three executive directors and then various
4 directors and principals at each of our schools and
5 assistant principals.

6 Q. And at each building, is there a leadership team that
7 handles administration of the building level?

8 A. Yes.

9 Q. And how is that organized?

10 A. We have a head principal in each of our 28 schools,
11 and then we may have one assistant principal up to four or
12 five assistant principals.

13 Q. I see.

14 A. And it varies by school campus.

15 Q. All right. If I could direct your attention in the
16 materials to D-6. D-6. Do you recognize this document?

17 A. I do.

18 Q. And what is this document?

19 A. This is the document -- the order that granted the
20 unopposed motion for declaration of partial unitary status
21 to the Rankin County School District, and that was in the
22 *Green* factor areas of both transportation and facilities.

23 Q. All right. And if I could direct your attention to
24 page 9 of this document. Do you see under paragraph 3 some
25 discussion of the site visits that had occurred?

1 MS. BURRELL: Objection again, Your Honor. I just
2 ask before the counsel asks the witness to start testifying
3 about documents that they need to be moved into evidence.

4 MR. HOOKS: Your Honor, I'll be happy to. This is
5 Exhibit D-6 to the school district's documentation. I was
6 attempting just to ask her if she knew what it was, but it
7 shouldn't be very controversial. This is one of the
8 desegregation orders in the case.

9 THE COURT: Okay. Any objection to D-6?

10 MS. BURRELL: No objection.

11 THE COURT: All right. D-6 is admitted.

12 (Defendants' Exhibit 6 entered.)

13 BY MR. HOOKS:

14 Q. All right. If I could direct your attention to page
15 9 of the document, do you see this?

16 A. I do.

17 Q. And does it reference something to do with a site
18 visit here?

19 A. It does.

20 Q. And there's two site visits, in fact; is that right?

21 A. That is correct.

22 Q. And does this indicate a site visit occurring between
23 May 2 through 6 of 2016?

24 A. It does.

25 Q. And who does it say visited the school district?

1 A. The United States conducted site visits of 11
2 schools; the Rankin County School District Alternative
3 School, known as the Learning Center; and the Rankin County
4 Juvenile Detention Center on May 2 through 6, 2016.

5 Q. And if you look down in the footnote here, there's a
6 listing of various schools that were visited; is that right?

7 A. That's right.

8 Q. And do any of those schools coincide with your
9 employment history at the district?

10 A. Puckett Elementary School was visited, and on that
11 occasion I was the principal there.

12 Q. So do you personally remember the visit?

13 A. I do.

14 Q. And was there another visit of other of the district
15 schools that occurred a couple years later, in May of 2018?

16 A. That is correct.

17 Q. And those site visits are listed in footnote 5; is
18 that right?

19 A. That is correct.

20 Q. And so at least going back to this visit in 2016, you
21 recall and have personal recollections of the district and
22 its involvement with desegregation obligations?

23 A. That's correct.

24 Q. Now, I'd like to direct your attention also to
25 Exhibit D-4. Now, do you recognize this document?

1 A. This is the consent order for the enlargement of the
2 Pearl attendance zone filed in 2012.

3 MR. HOOKS: Your Honor, I don't think there's any
4 controversy about this exhibit. It's D-4. We'd ask it be
5 entered into evidence.

6 THE COURT: Any objection to D-4?

7 MS. BURRELL: No objection.

8 THE COURT: D-4 is admitted.

9 (Defendants' Exhibit 4 entered.)

10 BY MR. HOOKS:

11 Q. Dr. Stocks, I want to direct your attention here to
12 page 8 of the order. Do you recognize this provision?

13 A. I do.

14 Q. What does this provision require with regard to
15 student assignment?

16 A. That the racial composition of each school within the
17 district should reflect the racial composition of the
18 district as a whole, and there was a plus or minus
19 20 percent noted here, and it was actually applicable to
20 White and Black students.

21 Q. So it's a deviation of plus or minus 20 percentage
22 points for White student enrollment and for Black student
23 enrollment as well?

24 A. That's correct.

25 Q. Now, if I could direct your attention to Exhibit D-13

1 of the materials. All right. So, Dr. Stocks, going back in
2 time with this exhibit -- well, first of all, let me ask, do
3 you recognize what this is?

4 A. I do.

5 Q. What is it?

6 A. This is the Rankin County School District student
7 enrollment chart for the year '25-'26, or the current school
8 years.

9 Q. And are there other years contained in this exhibit
10 of student enrollment as well?

11 A. Yes.

12 Q. All right.

13 A. '23-'24, '22-'23, and '21 -- 2021-2022.

14 Q. All right. I would like to direct your attention to
15 the last chart of the exhibit?

16 MR. HOOKS: Your Honor, this is D-13. This is
17 student enrollment. I'd like to ask this be admitted as
18 Exhibit D-13.

19 THE COURT: Okay. Any objection?

20 MS. BURRELL: Your Honor, I would just object to the
21 data that has been excluded, which I believe is student
22 enrollment data for years 2025-'26 and then 2024 through
23 '25.

24 THE COURT: I think the '24-'25 is not in this.
25 Correct?

1 MR. HOOKS: That's correct, Your Honor.

2 MS. BURRELL: Oh. This may be -- I might have an
3 older version, then.

4 THE COURT: It's okay. All right. D-13 is admitted.

5 MR. HOOKS: Your Honor, perhaps I misunderstood, but
6 my understanding was that '25-'26 data would be admitted
7 subject to allowing their expert to comment on it.

8 THE COURT: That's correct.

9 MR. HOOKS: Okay.

10 (Defendants' Exhibit 13 entered.)

11 BY MR. HOOKS:

12 Q. If you look with me, Dr. Stocks, at 2020-2021
13 information in the back of this exhibit, do you recognize
14 this?

15 A. I do.

16 Q. All right. What is the data for 20- -- on the last
17 page, the data is listed for 2020-2021 school year; is that
18 right?

19 A. Next to last page?

20 Q. Yes, the last two pages. You see that?

21 A. Yes.

22 Q. All right. So we start at the top with Brandon
23 Elementary on this chart, and we go through all the school
24 locations down to StoneBridge Elementary; is that right?

25 A. That's right.

1 Q. And then we have a total of all students by race; is
2 that correct?

3 A. That's correct.

4 Q. And if you look, there is a deviation that is
5 reported in the small box at the very end of those -- very
6 end of the exhibit, end of the chart. Do you see that?

7 A. I do.

8 Q. So does this indicate -- what does this indicate to
9 you in terms of this deviation that's presented here?

10 A. This is the range on the high and low ends of the
11 plus or minus 20 percent in comparing the school to the
12 district overall makeup.

13 Q. So in terms of Black student enrollment, if the
14 district itself district-wide has a 24.87 percent enrollment
15 of Black students, does that mean here according to this
16 chart that a plus or minus 20 percent deviation would be
17 anywhere between 4.87 percent to 44.87 percent?

18 A. That's correct.

19 Q. All right. Can I just ask if you'd take a moment and
20 review that column of Black student enrollment and tell the
21 Court whether or not any of those schools are within that
22 range or outside of the range.

23 A. They're all within the range.

24 Q. They're all within the range? All right. Similarly,
25 if you could take a look at White student enrollment, which

1 the deviation purports to show as anywhere between 47.52 and
2 87.52, are all the schools within that deviation?

3 A. They are.

4 Q. All right. So in terms of 2020-2021 student
5 enrollment, all schools are within a plus or minus
6 20 percent deviation for both Black student enrollment and
7 White student enrollment?

8 A. That's correct.

9 Q. All right. If I could direct your attention now to
10 the enrollment data for 2021-2022. I'd like to ask the
11 same, if you could take a look at Black student enrollment
12 relative to its deviation, which appears to be anywhere
13 between 5.75 percent to 45.75 percent --

14 MR. HOOKS: I promise this is the first time anyone
15 has ever asked me to slow down talking. I'll do better.

16 BY MR. HOOKS:

17 Q. Okay. With regard to Black student enrollment, what
18 did your analysis reveal?

19 A. They're all within that range.

20 Q. Okay. Now, same with regard to White student
21 enrollment. If you could take a look at that deviation,
22 which is 46.31 percent to 86.31 percent, could you take a
23 look at the White student enrollment and tell the Court if
24 you see any that are out of that range?

25 A. Okay. Florence Elementary is actually at

1 87.64 percent, and the high end of that range is 86.31.

2 Q. All right. So it's within two percentage points of
3 the deviation required but is nevertheless slightly outside
4 of the deviation?

5 MS. BURRELL: Objection, Your Honor, to counsel
6 testifying.

7 THE COURT: I'll sustain the objection.

8 If you'll just rephrase it.

9 BY MR. HOOKS:

10 Q. What does your analysis reveal of how far it is
11 outside the deviation?

12 A. One and a fraction of a percent outside.

13 Q. All right. And then if you'll look with me at the
14 enrollment data for 2020 --

15 A. Wait. There was another one. I'm sorry.

16 Q. Okay.

17 A. Flowood Elementary School.

18 Q. I'm sorry?

19 A. Flowood Elementary School is at 44.61 percent.

20 Q. And the deviation there?

21 A. It's actually on the low end, and it is 46.31. So
22 Flowood is actually under 2 percent lower than the low
23 range.

24 Q. All right. Now if I could direct your attention to
25 the next school year, which I believe is 2022-2023, and ask

1 you to take a look at the Black student enrollment applying
2 its range of somewhere between 7.12 percent and
3 47.12 percent.

4 A. They're all within that range.

5 Q. They're all within the range required?

6 A. Right.

7 Q. Okay. Take a look, then, at the White student
8 enrollment for that school year, '22-'23, and see if you can
9 give the Court an overview of which schools, if any, are
10 outside of the deviation.

11 A. Okay. Florence Middle School is at 87.1 percent, and
12 the top range is 86.59 percent, so that is less than a
13 percentage out. For Florence Middle School, Flowood
14 Elementary School is at 46.31 percent, and the bottom range
15 for the White population is 46.59 percent, so it's less than
16 a percentage out. And then also Pisgah Elementary is at --
17 wait. I'm sorry. I misspoke.

18 Q. So Pisgah Elementary, upon review, is within the
19 deviation?

20 A. It is. I'm sorry.

21 Q. So if I could direct your attention to the next
22 school year, which is '23-'24, can you take a look at the
23 Black student enrollment relative to this deviation of 20
24 percentage points for its district -- I'm sorry, yes,
25 district-wide enrollment, which is 7.8 percent to

1 47.8 percent.

2 A. Every school is within that range.

3 Q. I'm sorry?

4 A. Every school is within that range.

5 Q. All right. Take a look at the White enrollment, if
6 you would.

7 A. Florence Middle School is at 85.5 percent, and the
8 range is to 85 percent, so .5 percent out. And then let me
9 look at my back page. Pisgah Elementary is at 85.2 percent,
10 and the range is 85 percent. Pisgah High School,
11 86.3 percent, and the top end of the range is 85 percent.

12 Q. All right. The next school year is '25-'26 school
13 year. Do you see this range here of --

14 A. Yes.

15 Q. Okay. Take a look for your Black student enrollment,
16 which is anywhere between 8.9 and 48.9.

17 A. It is all within that range.

18 Q. All right. Now, take a look at your White student
19 enrollment, which I believe the deviation says here is 42.6
20 through 82.6.

21 A. Okay.

22 Q. So what did your analysis reveal, Dr. Stocks, on this
23 category?

24 A. Florence Elementary School is at 83.7 percent, and
25 the high range is 82.6. Florence High School is actually at

1 82.6 exactly. Florence Middle School, 84.1 percent, and the
2 range is 82.6. Flowood Elementary is on the low -- outside
3 of the lower end of the range at 41.3 with the range
4 starting at 42.6. Pisgah Elementary, 83.2 percent, and the
5 range is 82.6. Pisgah High, 84.4, with a range at 82.6.

6 Q. Thank you, Dr. Stocks, for that analysis.

7 Now if I could turn your attention to Exhibit D-65 of
8 the materials. You might have to get the other binder,
9 Dr. Stocks.

10 A. I'm sorry. Did you say 46?

11 Q. 65, I believe. D-65. All right. Dr. Stocks, do you
12 recognize this exhibit?

13 A. Yes.

14 Q. All right. What is it?

15 A. It is selective years of historical enrollment data,
16 Flowood Elementary School and Florence Middle School.

17 Q. Taking a look at the Flowood Elementary enrollment --
18 well, first let me ask, have you had an opportunity to
19 review this exhibit, and was it something that you regard as
20 consistent with what the data reflects?

21 A. Yes.

22 MR. HOOKS: I'd like for this to be admitted as
23 Exhibit D-65.

24 THE COURT: All right. Any objection?

25 MS. BURRELL: No objection, Your Honor.

1 THE COURT: D-65 is admitted.

2 (Defendants' Exhibit 65 entered.)

3 BY MR. HOOKS:

4 Q. All right. Taking a look at this exhibit,
5 Dr. Stocks, in terms of the Flowood Elementary data, do you
6 recognize or do you see where the data is presented here for
7 2013 to 2014?

8 A. Yes.

9 Q. Is that a district-wide total there?

10 A. It is for our Black students, White students, and
11 other classification of students.

12 Q. I see?

13 A. And then our total.

14 Q. And is the 2016-2017 enrollment data presented as
15 well?

16 A. It is.

17 Q. And is the 2023-2024 enrollment data presented also?

18 A. It is.

19 Q. All right. Just looking in terms of the 2013-2014
20 school year, in terms of Black student enrollment at Flowood
21 Elementary School, do you see where -- does it say it was
22 22.6 percent?

23 A. That is correct.

24 Q. And then when we get to 2016-2017, does Black student
25 enrollment indicate at Flowood Elementary School it's at

1 27 percent?

2 A. That's correct.

3 Q. And then it's at 25.7 -- I'm sorry 33.8 percent in
4 '23-'24?

5 A. That's correct.

6 Q. So it's grown from -- 2013-2014 Black student
7 enrollment increased from 22.6 percent to 33.8 percent?

8 A. That is correct.

9 Q. And with regard to White student enrollment, do you
10 notice what it has done in terms of increase or decrease?

11 A. The White student enrollment in 2013 was at 66.5
12 percent; and in '16-'17, 57 percent; and then '23-'24, 42.1
13 percent. So it has decreased.

14 Q. All right. And with regard to other student
15 enrollment, what's it done over these years in question?

16 A. In 2013-'14, it was at 10.9 percent; in 2016-'17 at
17 16 percent; and in '23-'24 at 24.1 percent.

18 Q. Okay. And with regard to the district-wide
19 enrollment, if you look at 2013-2014, do you see the
20 district-wide enrollment there of 22.2 percent Black in
21 '13-'14 school year?

22 MS. BURRELL: Objection again, Your Honor. I just
23 ask that counsel not lead their witness on direct
24 examination.

25 THE COURT: Okay. Just don't lead.

1 BY MR. HOOKS:

2 Q. Well, what -- Dr. Stocks, what do you see in the box
3 underneath the word "Black"?

4 A. For the 2013-2014 school year for the district, the
5 enrollment of our Black students is 4,296, or 22.2 percent.

6 Q. All right. And what do you see with regard to White
7 student enrollment for that year?

8 A. Its 14,222 students, or 73.4 percent.

9 Q. All right. So if you applied a plus or minus 20
10 percentage point deviation to the total district enrollment
11 to Flowood Elementary School, what would you find?

12 A. The district's Black students are at 22.2 percent for
13 '13-'14, and the Flowood Elementary School is at
14 22.6 percent, so it's almost a mirror.

15 Q. And with regard to White student enrollment, same
16 analysis. With regard to a deviation of plus or minus 20
17 percentage points, what do you find?

18 A. It falls within the plus or minus 20 for both the
19 Black and the White student population.

20 Q. All right. And with regard to enrollment trends
21 overall in the district, is it your understanding that
22 enrollment in the district itself has reflected a growing
23 percentage of other race students?

24 MS. BURRELL: Objection, Your Honor, again, as to
25 leading.

1 THE COURT: Okay.

2 MR. HOOKS: Your Honor, I'd like to be heard on that.

3 THE COURT: Okay.

4 MR. HOOKS: I honestly don't think that's a leading
5 question. I've asked her does the district enrollment
6 reflect a growing percentage of White student enrollment. I
7 don't think that's leading.

8 THE COURT: Okay. I'll overrule the objection.

9 BY MR. HOOKS:

10 Q. What have you noted about the district's enrollment
11 in terms of the its growth in terms of student enrollment
12 over the years?

13 A. Student enrollment growth has really boomed along
14 with the economic growth and residential growth,
15 particularly in our Brandon and our Northwest zones. And a
16 recent demographic study from McKibben from 2022 has
17 projected anticipated growth out towards the Pisgah
18 community in particular, among our other areas within the
19 Rankin County School District.

20 Was that your question?

21 Q. Well, I'd like to turn now to a few questions about
22 the students transfer policy -- or the student transfer
23 policy at the district. If I could direct your attention to
24 Exhibit D-15.

25 All right. Do you recognize D-15?

1 A. This is the intradistrict transfer policy, transfer
2 procedures policy.

3 Q. I see. This is the intradistrict transfer policy?

4 A. Correct.

5 Q. And with regard to this policy, does this deal with
6 students who are coming into the district from outside the
7 district?

8 A. This is students within the district.

9 Q. I see. And with regard to employees of the district,
10 if I could turn your attention also to Exhibit D-16 and ask
11 if you recognize this exhibit?

12 A. This is the Mississippi code for allowing educators
13 to transfer their students.

14 MR. HOOKS: Your Honor, I'd like to ask that Exhibits
15 D-15 and D-16 be admitted into evidence.

16 THE COURT: Any objection?

17 MS. BURRELL: No objection, Your Honor.

18 THE COURT: All right. D-15 and 16 are admitted.

19 (Defendants' Exhibits 15 and 16 entered.)

20 BY MR. HOOKS:

21 Q. With regard to -- just generally, with regard to how
22 transfer policy works with respect to students of district
23 employees, can you explain how the transfer process works in
24 the school district?

25 A. If you are an employee -- you can see how large our

1 county is if you're looking at the map, and you know see
2 within that large geographic area there's those eight
3 community schools, so if an employee resides in the Florence
4 community but works in the Pelahatchie community, then they
5 may put in for their child to be allowed to go to school in
6 Pelahatchie where they're working instead of in Florence
7 where they reside.

8 Q. I see. So with regard to the policy itself, is what
9 you're telling the Court that students of both classified
10 and certificated or licensed employees are permitted this
11 transfer?

12 A. We do allow it for both certified and classified
13 employees. It is actually a retention and recruitment tool
14 for our employees.

15 Q. And why is that?

16 THE COURT: Hold on one second.

17 Ms. Burrell?

18 MS. BURRELL: Objection again, Your Honor. I really
19 just ask counsel to stop leading the witness with yes-or-no
20 questions.

21 THE COURT: All right. Overruled.

22 What's your next question, Mr. Hooks?

23 BY MR. HOOKS:

24 Q. Have you examined the impact of transfer students on
25 the resulting student enrollment?

1 A. Of the students that we allowed to transfer within
2 the district where their parents are employed, I have, and
3 what I have found is that the quality -- we believe in the
4 quality of education in each of our eight communities. I've
5 even looked as far as into the quality of education for our
6 subgroups, including our Black student population, to make
7 sure that there's no unintended consequence to allowing our
8 employees to do what the state law allows them to do as far
9 as their children going to school where they're employed and
10 have not found a negative impact on that.

11 Q. You say you have not found a negative impact. What
12 else did you find or not find with regard to any increases
13 substantially in student enrollment?

14 A. Our intradistrict transfers are 2 to 3 percent of our
15 total student population, so it is a very minimal amount of
16 students that we're talking about in comparison to our
17 student population within the district.

18 Q. Dr. Stocks, if I could direct your attention to
19 Exhibit D-20 in the materials. Dr. Stocks, what is this
20 document?

21 A. This is our Rankin County School District Venture
22 referral to placement procedures, and it is -- Venture is
23 our gifted program. That's what we call it in the Rankin
24 County School District.

25 Q. In what grades does the district offer the gifted

1 program?

2 A. We offer gifted for our students up through eighth
3 grade, and the State requires through sixth, but Rankin
4 County School District offers it through the eighth grade.

5 Q. And when you say the State requires it, what do you
6 mean by that?

7 A. That intellectually gifted programs would be offered
8 to our public school students in the state of Mississippi
9 through the sixth grade, but as interest is there in our
10 district, we provide that for students beyond that sixth
11 grade year.

12 Q. Yes, ma'am. This Exhibit D-20, do you recognize this
13 as containing the referral to placement procedures for the
14 gifted program of the district?

15 A. I do.

16 MR. HOOKS: Your Honor, I'd like to ask this be
17 admitted as Exhibit D-20.

18 THE COURT: Any objection?

19 MS. BURRELL: No objection.

20 THE COURT: Exhibit D-20 is admitted.

21 (Defendants' Exhibit 20 entered.)

22 BY MR. HOOKS:

23 Q. If you'll look with me, Dr. Stocks, on -- several
24 pages over there's something here at the top of the page
25 called "Mass Screening Referral Process (1st & 2nd grade)."

1 I'd like to direct your attention there. Do you see that
2 page?

3 A. I do.

4 Q. To what is this referring, Dr. Stocks?

5 A. This is referring to the district's process to try to
6 identify intellectually gifted students in first grade as
7 well as second grade by conducting what we refer to as a
8 mass screening of all of our students in those grades across
9 the district.

10 Q. I see. And is the mass screening process something
11 that comes from MDE, or where does it come from? Let me ask
12 it that way.

13 A. Yes. First grade, but Rankin County School District
14 added a second year to try and identify all students in
15 second grade, and so since we've done that, we have seen an
16 improvement in identification of intellectually gifted
17 students, particularly in our Black gifted students.

18 Q. With regard to the Step 1, where there's an asterisk
19 here about students scoring in the 84th percentile, do you
20 see that?

21 A. Yes.

22 Q. Could you explain to the Court what that is and what
23 that's about?

24 A. Okay. So whenever students are part of the mass
25 screening in either first or second grade -- and that's

1 something that we don't require parental permission for.
2 That's just something we do across the board. That's why we
3 call it a mass screening -- if a student falls within the
4 90th percentile or higher on that screener, then they would
5 go to the next step to be referred to gifted testing through
6 an IQ test and some forms that go to the teacher and home to
7 the parent.

8 But if a student is close to that 90th percentile and
9 falls between the 84th percentile and the 89th percentile,
10 there's something called the special considerations
11 checklist that the district will look at just to see if we
12 could qualify somebody through these special considerations.

13 Q. And do you know how it was or why the district added
14 this provision regarding the 84th to 90th percentile?

15 A. It is something to help us make sure that we're not
16 missing students just because they didn't score in that
17 90sth or above percentile, and it also helps to look at
18 other factors that just that one mass screener would not
19 consider.

20 Q. I see. And if you'll look with me at Exhibit 21, do
21 you recognize that document?

22 A. These are the gifted regulations that are set forth
23 by the Mississippi Department of Education, and this is the
24 revised version because it's dated 2023.

25 MR. HOOKS: Your Honor, I'd like to ask this be

1 admitted as Exhibit D-21.

2 THE COURT: All right. Any objection?

3 MS. BURRELL: No objection, Your Honor.

4 THE COURT: All right. D-21 is admitted.

5 (Defendants' Exhibit 21 entered.)

6 BY MR. HOOKS:

7 Q. I'd like also, Dr. Stocks, to direct your attention
8 to Exhibit D-22 and ask if you know what this document is?

9 A. This is something that we post on social media and
10 share with our community about our gifted program.

11 Q. All right. And what -- how are these distributed?
12 And is -- the next one regarding the Venture program, the
13 rocket, are these both -- how are these distributed?

14 A. We have a monthly posting on our Rankin County School
15 District social media regarding our gifted program, and then
16 not limited to that but at least once a month, we want to
17 get something out to our community through our school
18 district social media. And then also we share information
19 about our program through our day-care programs that we
20 collaborate with through our district and in the community
21 through -- at the schools through open houses and
22 meet-the-teacher events and so forth.

23 MR. HOOKS: Your Honor, I'd like to ask that Exhibit
24 D-22 be admitted.

25 THE COURT: Any objection?

1 MS. BURRELL: No objection.

2 THE COURT: All right. Exhibit D-22 is admitted.

3 (Defendants' Exhibit 22 entered.)

4 BY MR. HOOKS:

5 Q. If you'll look at the blue box on the Venture
6 brochure that begins "To find out more about Venture." Do
7 you see that?

8 A. I do.

9 Q. What does it say about all first and second grade
10 students?

11 A. "All 1st and 2nd grade students are screened for the
12 gifted education program." Sorry.

13 Q. Go ahead. What's the next sentence say?

14 A. "Students in 3rd through 7th grade can be referred by
15 parents, teachers, and administrators for screening in our
16 program."

17 Q. If you'll look at the next page of the exhibit with
18 the rocket, do you see there's a blue box there as well?

19 A. Yes.

20 Q. And does it contain information about the screening
21 program?

22 A. "All 1st and 2nd grade students are screened for the
23 gifted education program. Students in 3rd through 7th grade
24 can be referred for screening by anyone having reason to
25 believe that the student might be intellectually gifted."

1 Q. And what does it say after that?

2 A. "Screener sample questions can be found on the Rankin
3 County School" -- or "RCSD website," it states our website,
4 and then "under gifted education."

5 Q. So the reference to the website is a reference to
6 what?

7 A. The sample questions if parents or family members
8 wanted to see what questions might would be asked or what
9 they would look like on the screener, they want to show
10 those to their children, then there's some sample questions
11 there.

12 Q. And just so we're clear, if you'll go back and flip
13 back to Exhibit 20, this is the Venture program placement
14 procedures referral to placement procedures you identified
15 earlier?

16 A. Correct.

17 Q. If you'll look at the first few pages, we sort of
18 skipped over these. I'd like to ask that you look at the
19 one that has "Individual Referral (Grades 3 through 7) on
20 this. Do you see this?

21 A. I do.

22 Q. All right. So is this the referral process to which
23 those flyers refer?

24 A. Well, any student -- yes, it could be. But also
25 those flyers are talking about -- to families and to

1 students in grades one through two as well, because it
2 mentions the mass screening. But certainly for anyone who
3 was in our district beyond first or second grade that could
4 participate in our gifted program, it refers to students who
5 for whatever reason may not have scored high enough in first
6 or second grade, we could still refer them. And so this is
7 that individual referral.

8 Q. I see. And now look with me at Exhibit D-23 and see
9 if you can identify it, please. What is this document?

10 A. This particular document is a training for our
11 teachers on how to refer students to gifted and identifying
12 gifted learners. I see the Highland Bluff Elementary on it,
13 so I'm assuming it was created by the Highland Bluff
14 Elementary -- or presented at Highland Bluff Elementary, you
15 know, by the Venture teacher, presented by hand.

16 But it's presented in all of our schools that have
17 those grade configurations to take for students who could
18 participate in gifted, and we're training all of our
19 teachers on -- or staff on how to identify and refer
20 students to the gifted program. And that happens twice a
21 year, so that's what this document represents.

22 Q. I see.

23 MR. HOOKS: So, Your Honor, I'd like to ask this be
24 marked as Exhibit D-23.

25 MS. BURRELL: No objection, Your Honor.

1 THE COURT: All right. D23's admitted.

2 (Defendants' Exhibit 23 entered.)

3 BY MR. HOOKS:

4 Q. And this is -- did you say -- or is this document or
5 this training typical throughout the district?

6 A. Yes. Each one of our -- I'm sorry.

7 Q. Go ahead. I'm sorry.

8 A. Each one of our schools each semester.

9 Q. I see. And who provides this training?

10 A. It could be the school's gifted teacher; it could be
11 with -- alongside the support of our student support
12 services and counseling department personnel as well.

13 Q. I see. And, Dr. Stocks, if you'll go back to -- or
14 if I could direct your attention to Exhibit D-24, I believe
15 you had mentioned a moment ago about the special
16 considerations for gifted identification checklist maybe?

17 A. Yes, I did. So --

18 Q. Is this part of the process?

19 A. It is. So when students are screened, whether that
20 is through the mass screening in grades one or two or
21 whether it's individually from an individual referral in
22 grades three or above, then if a student does not
23 automatically reach that 90th percentile or higher on the
24 screener but does reach 84th to 89th percentile, then this
25 special considerations checklist will be applied.

1 And so it -- in Option I, it states that if a student
2 has been diagnosed with ADD or ADHD, then that student,
3 because of Option I, could move on to be referred for the IQ
4 testing for gifted or Option II if they satisfy five or more
5 of the criteria listed under Option II, and a student could
6 move on to the next phase and ultimately the IQ testing for
7 gifted placement.

8 Q. I see. And, Dr. Stocks, if I kind of direct your
9 attention -- let me ask you this, Dr. Stocks. Have you had
10 an occasion to look at gifted enrollment numbers over the
11 last several years?

12 A. I have.

13 Q. What have you observed?

14 A. Our Black student population in our gifted program
15 was at 89 students in, I believe, the year 2016-'17, and
16 today we have 197 Black students in our gifted program.

17 Q. 197 today?

18 A. Correct. So it has more than doubled.

19 Q. I see. What do you attribute that to, Dr. Stocks?

20 A. I attribute it to several things. I attribute it to
21 our adding the additional grade that we mass screen our
22 students; I attribute it to the training of our teachers in
23 our elementary schools on how to identify and the
24 characteristics of gifted learners; I attribute it to the
25 fact that we have added some nonverbal screeners and a

1 nonverbal IQ test to test our children, which those types of
2 screeners and IQ tests lend themselves to students who do
3 not have strong linguistics skills, so it would catch
4 students who may otherwise not make it on another type of IQ
5 test. So...

6 Q. Now, when you talk about the increase just in terms
7 of the numbers of Black students in gifted from, I believe
8 you said, 2017-'18 era, has that percentage also increased
9 relative to the district demographics?

10 A. I believe it was approximately 8 percent the year
11 that I mentioned when there were less than 90 students, and
12 then now it is approximately 18 percent.

13 Q. And with regard to the total number of students in
14 the gifted program, do you have a sense of what that is now?

15 A. 1,055.

16 MS. BURRELL: Your Honor, I believe -- sorry to
17 interrupt -- that D-24, there was a lot of testimony about
18 that, but I'm not sure counsel moved that into evidence, so
19 I'd ask either that they move it into evidence or that the
20 testimony related to that be struck.

21 MR. HOOKS: Your Honor, I'm sorry. I thought I did.
22 I'd like to admit D-24, please, or have the Court do so.

23 THE COURT: Any objection?

24 MS. BURRELL: No objection.

25 THE COURT: All right. D-24's admitted.

1 (Defendants' Exhibit 24 entered.)

2 BY MR. HOOKS:

3 Q. Now, in terms of the staffing of the gifted program,
4 could you speak to any efforts in that regard?

5 A. Sure. So we have traditionally not had diversity
6 amongst our gifted program teachers. We looked at this and
7 thought carefully about why that might be. We looked at all
8 of our certified employees in our district to see what areas
9 of certification they were licensed in and compared that to
10 who was currently teaching in our gifted classrooms. There
11 were a few administrators that had gifted certification, but
12 they were already an administrator and would not consider
13 going back to teaching gifted. There were -- there was one
14 teacher at the middle -- one of our middle schools that had
15 the certification that helped diversify the staff, and that
16 was it of all our certified employees that we found that had
17 the proper credentials.

18 Now, one thing Mrs. Anitra Hollis has done as our
19 human resources director is she publishes a monthly
20 informational thing from our human resources department to
21 all of our employees where she always shares pathways for
22 our teach- -- our current teachers to attain various
23 certifications, including gifted certification. She also
24 communicates regularly to our staff about --

25 MS. BURRELL: Objection, Your Honor. I'd ask that

1 the witness either lay the foundation for how she knows this
2 information or that she not testify to any sort of hearsay.

3 THE COURT: I overrule the objection. You may
4 proceed.

5 A. I'm her supervisor, so I've asked her to do these
6 things, if that helps to clarify. And I did them in
7 whenever I was in her position as the human resources
8 director for the Rankin County School District as well.

9 But what I was saying is that we -- so we considered
10 who our current staff were that had that certification. We
11 considered how we communicate opportunities and pathways for
12 that certification to our current employees. We've
13 considered -- oh, we've also shared the information about
14 how colleges, and you can go to Ole Miss, for example, and
15 take nine hours and become gifted certified or whatever that
16 may be as those qualifications and requirements ebb and
17 flow. So we -- we communicate all that to our current
18 staff.

19 And then also one thing that we did is that we looked
20 at -- well, in elementary the structure of a teacher
21 becoming a gifted teacher in the Rankin County School
22 District, usually it's somebody that was a classroom teacher
23 in our district that attains the certification, and when the
24 gifted teacher that's been there for her career or a long
25 time retires or whatever, she -- someone will apply for that

1 position. So it's usually an intern- -- it's been
2 historically an internal transfer.

3 So what I required this year, upon reflection and
4 realization of that, is -- is that regardless of who we have
5 that has that certification in-house, we're going to
6 externally -- we're going to commit to externally post those
7 positions to cast that wider net to try to -- as a good
8 faith effort to improve the diversity of our gifted
9 education teachers in our district. And we did that this
10 year, and we were successful. We had one gifted education
11 teacher from a neighboring county, Madison County, to come
12 to Rankin County School District who is at Oakdale
13 Elementary this year. So that was a good faith effort that
14 we implemented and had a positive result from.

15 Q. Thank you, Dr. Stocks. If I could turn your
16 attention now to Exhibit D-19, I'd like to ask you some
17 questions about advanced placement and something called dual
18 credit and honors programming. Does this Exhibit D-19 look
19 familiar to you?

20 A. It does. It's our policy ICB-curriculum development
21 planning.

22 Q. All right. What does this relate to?

23 A. Related to our accelerated course placement; our
24 compacted math and eighth grade math, or Algebra I
25 placement; our honors and accelerated course placement.

1 Q. All right.

2 MR. HOOKS: Your Honor, I'd like to ask that D-19 be
3 marked as the school district's next exhibit.

4 THE COURT: Any objection?

5 MS. BURRELL: To be moved into evidence? No
6 objection.

7 THE COURT: D-19 is admitted.

8 (Defendants' Exhibit 19 entered.)

9 BY MR. HOOKS:

10 Q. If you'll look with me on D-19, you'll see something
11 in the box here called "CCR 7th Grade Compacted Math" or
12 "CCR 8th Grade Compacted Math (Algebra I)." Do you see
13 that?

14 A. I do.

15 Q. Can you give the Court an overview in its simplest
16 terms of what this is?

17 A. In seventh grade, it is an accelerated pace for the
18 curriculum for math, and in eighth grade it is taking
19 Algebra I early and being able to earn a Carnegie -- well,
20 in both cases be able to earn a Carnegie Unit for them in
21 seventh and eighth grade.

22 Q. And I notice here there's some verbiage in the box
23 about what these prerequisites are. Do you see that?

24 A. Right. I do.

25 Q. And there's some prerequisites here, and then there's

1 discussion about something a student can do. What is that
2 about?

3 A. Right. So our prerequisites -- we were challenged to
4 reflect on that and see if that would be a potential barrier
5 for any of our students, and so we did. And if a student --
6 the prerequisites were there as a student having to score a
7 proficiency level of five, advanced, on their state test and
8 have a final grade in the previous year for at least
9 90 percent or higher on their final grade.

10 So what has been changed is that those are our
11 recommendations, but now if a student does not meet
12 prerequisite A and B, then a parent could submit a request
13 and say, you know, my child wants this challenge. I know we
14 didn't quite make it or whatever the case may be, we did not
15 meet these recommendations for predictor of student success,
16 but, you know, we're going to commit to doing what we need
17 to do to take this course. And so then the principal can
18 say, yes, we're going to let you take this course anyway.

19 Q. I see. And with regard to that or similar verbiage,
20 do you see on the next page where there's discussion of
21 these requirements for other honors and advanced placement
22 courses?

23 A. Yes. And it's the same throughout.

24 Q. And you said this was decided on after reflection.
25 Did that have anything to do with the case we're here today?

1 A. Absolutely.

2 Q. How?

3 A. Well, we have taken and listened to all suggestions
4 and recommendations with open hearts and really reflected do
5 we have any barriers? While Rankin County School District
6 has a strong quality of education and we're known for that
7 across the state, we want quality of education to be equal
8 for all of our students, and so if there is a barrier or a
9 perceived barrier, then we want to listen to what that point
10 of view is, and then we want to see how we can work to make
11 that better. And so this is an example of one of our good
12 faith efforts around that work.

13 Q. I see. And at some point in time also, did you
14 participate in presentation or do you know about a
15 newsletter that would go out to describe the -- direct your
16 attention D-27?

17 THE COURT: D-27?

18 MR. HOOKS: 27.

19 BY MR. HOOKS:

20 Q. All right. What is this document?

21 A. This is our parent newsletter on advanced placement
22 courses.

23 MR. HOOKS: All right. So, Your Honor, before I ask
24 a question, I'd like to ask that D-27 be entered as an
25 exhibit here in this proceeding.

1 THE COURT: Any objection?

2 MS. BURRELL: No objection.

3 THE COURT: All right. D-27 is admitted.

4 (Defendants' Exhibit 27 entered.)

5 BY MR. HOOKS:

6 Q. So you said this is a parental newsletter or
7 something that goes to the parents, then; right?

8 A. Right.

9 Q. And what is the information that's being communicated
10 here?

11 A. Well, some context. To begin, I would like to say
12 that we have eight honors courses available to students
13 based on their interests, so that's not the same from school
14 to school within our district, and also 28 advanced
15 placement opportunities. So this particular newsletter is
16 also on our district website, so it is for our parents and
17 students, but it's also for the wider community. It's
18 available on our district website. Our counselors use it
19 with our students in the schools.

20 But this is basically -- the purpose of this is to
21 inform students and parents in the broader community of the
22 benefits of taking advanced placement courses and also of
23 eligibility and also of fees associated with advanced
24 placement.

25 Q. So if you look here under "Fees," what does it say

1 about fees for those students who may have a significant
2 financial need?

3 A. "Fees are due by a specified" -- so let me get to the
4 part you're asking about. "If you have significant
5 financial need, you may be eligible for a \$37 College Board
6 fee reduction per AP Exam. Rankin County" -- or "RCSD will
7 assist with fees for students who meet certain assistance
8 eligibility requirements. Check with your AP coordinator to
9 find out what support may be available to you."

10 So in the Rankin County School District, we pay for
11 the AP course fees, exam fees, for all of our students who
12 receive free or reduced lunch. And we also, in our three
13 title high schools, pay for any student that takes an AP
14 course.

15 Q. And does it say something about eligibility under
16 that?

17 A. It does.

18 Q. What does it say?

19 A. "All students are eligible to enroll and participate
20 in Advanced Placement courses."

21 Q. Now, this fee waiver issue, does this provision have
22 something to do with why we're here today?

23 A. It falls under the *Green* factor about access and
24 opportunity --

25 MS. BURRELL: Objection, Your Honor.

1 A. -- for a student --

2 THE COURT: Hold on second. What --

3 MS. BURRELL: Objection. I'd ask that the witness
4 not testify to any sort of legal conclusions as a fact
5 witness.

6 THE COURT: I'll overrule the objection.

7

8 MR. HOOKS: Let me just ask it this way, Your Honor.

9 BY MR. HOOKS:

10 Q. How did this get into this brochure, or why is it
11 here?

12 A. It was a good faith effort to communicate better our
13 practices for how we try to take care of the needs of our
14 students who may have socioeconomic disadvantage. We don't
15 want anyone to miss out on an opportunity. When our
16 students succeed, we as a district succeed. That's why we
17 exist, to support them.

18 Q. And with regard to 2025 current enrollment for
19 advanced placement, dual credit, or honors, have you had an
20 opportunity to review those numbers?

21 A. Repeat your question. I'm sorry.

22 Q. Yes. Have you had an opportunity to enroll the
23 enrollment data for AP?

24 A. I have.

25 Q. And with regard to participation of Black students,

1 have you had a chance to look at it?

2 A. I have.

3 Q. And what does it show in terms of the percentage
4 there?

5 A. Well, actually, for advanced placement, honors, and
6 dual credit courses across our district, it's at least
7 20 percent Black student participation of the overall
8 participation. With AP --

9 MR. MYERS: I object. I think she may be giving an
10 opinion based on lay witness (INAUDIBLE).

11 THE COURT: Okay. I'm going to overrule the
12 objection. Counsel, just remember this is a bench trial.
13 I'm not worried about jury confusion and things like that,
14 so I can read -- I can weed through the testimony if I need
15 to --

16 MR. MYERS: Thank you, Your Honor.

17 THE COURT: -- but your objection's noted and you --

18 MS. BURRELL: Understood, yes. And I would just join
19 that objection, but also I don't think it's in evidence yet.

20 THE COURT: All right. Thank you.

21 MR. GRIFFITH: Your Honor, I have to bring this up at
22 this time --

23 THE COURT: You've got a counsel that's standing up
24 representing your interests. You both can't object.

25 MR. GRIFFITH: I'll defer to him. Thank you, Your

1 Honor.

2 THE COURT: Thank you, sir. All right.

3 THE WITNESS: What was your question? I'm sorry?

4 THE COURT: I was going to say the same. What is the
5 current question that's on the table?

6 MR. HOOKS: I think the witness answered it, Your
7 Honor.

8 THE COURT: Okay. All right. So you're finished.

9 MS. BURRELL: Your Honor, can she just re-answer that
10 so I can --

11 THE COURT: You can ask her on cross.

12 BY MR. HOOKS:

13 Q. In terms of looking at enrollment trends in AP and
14 honors courses, Dr. Stocks, have you had an opportunity to
15 make observations about that with regard to racial
16 participation?

17 A. I have. Taking the '21-'22 school year for example,
18 or -- just take that '21-'22 school year for example. In
19 the years that we're talking about in this case, what I've
20 noticed is that our Black student participation is, let's
21 say, the 23 percent participation, approximately, and, you
22 know, we know our student body is roughly approximately
23 28 percent Black, so it is not exact, but it is
24 representative of our Black student population.

25 Our White population isn't as predictable. Sometimes

1 it may be what I would consider underrepresented in some of
2 these courses in the years that I looked at, and it
3 doesn't -- so one doesn't predict the other because these
4 are student choice.

5 Q. If I could direct your attention to Exhibit D-29.
6 Dr. Stocks, do you recognize this?

7 A. This is the procedures manual for the State of
8 Mississippi for dual enrollment and accelerated programs.

9 MR. HOOKS: I would like to ask this be admitted as
10 D-29.

11 THE COURT: Any objection to D-29?

12 MS. BURRELL: No objection.

13 THE COURT: All right. D-29 is admitted.

14 (Defendants' Exhibit 29 entered.)

15 BY MR. HOOKS:

16 Q. Dr. Stocks, with regard to the dual credit or dual
17 enrollment programs, could you explain to the Court what
18 these are and how they differ from honors or AP?

19 A. Yes. Dual enrollment is a wonderful opportunity
20 that's afforded to our students in Mississippi, including
21 our students in the Rankin County School District, where
22 high school students their junior or senior year -- unless
23 they're in a career-technical dual enrollment program, which
24 they could be in their tenth grade year -- but these
25 students are allowed to take courses at their high school

1 and earn college credit, which has many benefits for our
2 students.

3 Q. So is it fair to say that the dual credit programming
4 is set out in policies by the State of Mississippi itself?

5 A. It is.

6 Q. And with regard to dual credit opportunities, do
7 those come from the community college, or where -- where do
8 they come from?

9 A. Our memorandum and agreement is with Hinds Community
10 College.

11 Q. I see. So in terms of the qualifications, does the
12 district set those, or does the community college?

13 A. Hinds Community College sets those.

14 Q. I see. However, with regard to participation in the
15 dual credit programming, have you had an opportunity to look
16 at whether the district students are participating in that
17 program in terms of the racial makeup?

18 A. I'm sorry. What was your question?

19 Q. In terms of the racial makeup of dual credit
20 participation, have you had an opportunity to look at that?

21 A. I have.

22 Q. And what have you found?

23 A. I found approximately 20 percent of our Black
24 students are participating in dual credit opportunities
25 across the district.

1 Q. And has the district made any efforts to make those
2 dual credit opportunities available and accessible to
3 students?

4 A. Yes.

5 Q. How?

6 A. Through our counselors and our teachers and
7 administrators at local schools talking to students, through
8 informing our parents of those opportunities, through our
9 parent newsletter, through our parent nights and open
10 houses, and through social media. A myriad of ways.

11 Q. And what about the fees for those programs?

12 A. Yes. It's similar to what we do to support our
13 students with our honors and AP courses. So if a student is
14 free or reduced lunch, their fees will be paid. If they are
15 in a career and technical enrollment program, that fee is
16 paid through the district's agreement with Hinds Community
17 College. So -- and then also for our honors and AP courses
18 and our dual enrollment courses, we consider any hardship
19 situation even if that student is not a student receiving
20 our free or reduced lunch as well.

21 Q. All right. I want to turn your attention to Exhibit
22 D-56, please. All right. What is D-56, Dr. Stocks?

23 A. D-56 is a snapshot of our Rankin County School
24 District accountability for the year 2024, and then behind
25 it also under this tab is the same thing for year 2022.

1 Q. All right. And when you say "district
2 accountability," what do you mean by that?

3 A. It highlights the achievements of our students in
4 regards to reading proficiency, math proficiency, science,
5 history proficiency, our third grade Reading Gate pass rate,
6 also in comparison to our rankings across the state. It's a
7 brag board for the district.

8 Q. All right. So if you look --

9 MR. HOOKS: I'm sorry. Your Honor, I'd like D-56,
10 both pages of it, to be admitted as district's next exhibit.

11 THE COURT: Any objection?

12 MS. BURRELL: No objection.

13 THE COURT: All right. D-56 is admitted.

14 (Defendants' Exhibit 56 entered.)

15 BY MR. HOOKS:

16 Q. All right. So in terms of the desegregation
17 obligations of the district, what significance, if any, does
18 this document have?

19 A. This document speaks to the quality of education and
20 the success of our students in each of our eight
21 communities, and it represents all of our students. In
22 particular, for example, if I can point you to the
23 achievements at the bottom in the purple color, third grade
24 Reading Gate pass rate for 2024 was at 99 percent. So I
25 don't have to look at the demographic breakdown of how Black

1 children did or other identified students or White students
2 because 99 percent of our students passed this literacy
3 benchmark exam, and we're proud of that. We're proud of the
4 accomplishment of all of our students as reflected on here.

5 Q. So in terms of third grade Reading Gate, so it --
6 what is the significance of passing that exam?

7 A. The significance is that literacy is the foundation
8 for someone's education, and so to get them to that
9 benchmark year in third grade that the State recognizes
10 students should be able to be proficient in reading and to
11 have 99 percent, you know, passing that, and some schools as
12 indicated having 100 percent passing, is quite an
13 achievement, and we're proud of that.

14 Q. And is that same trend indicated in 2022 as well?

15 A. 96 percent overall with individual schools reaching
16 the 100 percent pass rate.

17 Q. All right. And if you'll look with me at D-57, what
18 is D-57?

19 A. This is from the Mississippi Succeeds Report Card
20 from the Mississippi Department of Education.

21 Q. All right. So --

22 A. It is --

23 Q. Go ahead. I'm sorry.

24 A. It is the accountability data for the 2023-2024
25 school year, and it identifies Rankin County School District

1 as an A district, which we are. We're known for being an A
2 district.

3 MR. HOOKS: All right. Your Honor, I'd like to ask
4 D-57 be admitted.

5 THE COURT: Any objection?

6 MS. BURRELL: No objection.

7 THE COURT: All right. D-57 is admitted.

8 (Defendants' Exhibit 57 entered.)

9 BY MR. HOOKS:

10 Q. It's an A district, but if you'll look with me -- or
11 if you'll look with me over on -- a few pages over -- I'm
12 not sure these are numbered. I think there's a little Bates
13 number on the side that says RCSD 125.

14 What are these pages that list the schools
15 individually?

16 A. This is the individual school rating for that year.

17 Q. So what does that indicate? What do these letters
18 indicate?

19 A. A is the highest rating given and recognized in the
20 state of Mississippi for public schools, and all of our
21 schools in the '23-'24 school year you can see here are an A
22 or a B school.

23 Q. So there are no C-rated schools or D-rated schools or
24 F-rated schools? Every school is an A or B in the Rankin
25 County School District?

1 A. Correct.

2 Q. And then if you'll look with me at the next exhibit,
3 which is D-58, do you recognize this?

4 A. Yes.

5 Q. What is D-58?

6 A. D-58 is the chronic absenteeism report from the
7 Mississippi Department of Education for the 2023-2024 school
8 year.

9 MR. HOOKS: Your Honor, I'd like D-58 to be entered
10 admitted as the next exhibit.

11 THE COURT: Any objection?

12 MS. BURRELL: No objection.

13 THE COURT: D-58 is admitted.

14 (Defendants' Exhibit 58 entered.)

15 BY MR. HOOKS:

16 Q. And what is chronic absenteeism, and what does this
17 report try to do about it?

18 A. Chronic absenteeism is an at-risk factor for our
19 students. If they're not at school, then we can't educate
20 them, and so Rankin County School District has worked hard
21 to have good, consistent attendance of our students so that
22 we can provide them an education, and we are proud of these
23 efforts and recognized statewide for our accomplishment in
24 this area.

25 Q. I see. If you'll look with me at page 9 of this

1 report. What does the chart up at the top in all caps say?

2 A. "Lowest chronic absenteeism rates by district."

3 Q. Do you see a name that is familiar to you on that
4 list?

5 A. The Rankin County School District.

6 Q. And is it fifth from the top?

7 A. That's correct.

8 Q. And its chronic absenteeism rate's 13.65?

9 A. Correct.

10 Q. And in fact, one of the elementary schools, according
11 to the chart below, has the lowest chronic absenteeism rate
12 by schools; is that right?

13 A. That's Brandon Elementary School.

14 Q. And what was its ranking?

15 A. 5.05 percent.

16 Q. And if you'll look at Exhibit D-59, do you recognize
17 this?

18 A. Yes.

19 MR. HOOKS: Your Honor, I'd ask that D-59 be entered
20 as the next exhibit.

21 THE COURT: Any objection to D-59?

22 MS. BURRELL: No objection.

23 THE COURT: All right. D-59 is admitted.

24 (Defendants' Exhibit 59 entered.)

25 BY MR. HOOKS:

1 Q. Dr. Stocks, what is the significance of D-59?

2 A. D-59 is the Mississippi Department of Education's
3 recognition -- it's the report of the Literacy-Based
4 Promotion Act annual report, and it's for the 2023-20 24
5 school year.

6 Q. All right. And how does the district stack up with
7 regard to this report? Or maybe I should ask it this way:
8 What is the significance of including this here?

9 A. It just speaks to the quality of the education in the
10 Rankin County School District that we provide to all of our
11 students.

12 Q. All right. And if you'll look with me at Exhibit 60,
13 do you recognize this exhibit?

14 A. Yes.

15 Q. What is this exhibit?

16 A. This exhibit has our graduation rate and dropout rate
17 by year.

18 Q. All right. So this is '23-'24; is that right?

19 A. Yes. That's on here.

20 Q. All right. And what does the graduation rate of the
21 district show with regard to African-American students?

22 A. Our -- for the 2023-2024 school year, our graduation
23 rate for our Black students was at 93.6 percent.

24 Q. All right. And what was the graduation rate for
25 White students that year?

1 A. 92.2 percent.

2 Q. All right. And you said the documentation also shows
3 the rate for dropouts also. Can you tell us what the
4 dropout rate was?

5 A. For our Black students, 4.8 percent. For our White
6 students, I think that says 6.8 percent.

7 Q. I'm sorry?

8 A. 6.8 percent.

9 Q. And with regard to how the district overall compares
10 with regard to the graduation rate or the dropout rate
11 compared to the state, do you have a sense of that?

12 A. I do. I'm proud to say that our Black students in
13 particular are -- as the example just shown, the statistics
14 are better than our White students within our district, and
15 all our district compared to the state and the nation is
16 also better in these regards.

17 MR. HOOKS: Your Honor, I'd like for D-60 to be
18 entered as the next exhibit.

19 Did I do that already?

20 Next exhibit, D-60.

21 THE COURT: All right. Any objection?

22 MS. BURRELL: No objection.

23 THE COURT: All right. D-60 is admitted.

24 (Defendants' Exhibit 60 entered.)

25 THE COURT: Do you still have a while longer with

1 this witness?

2 MR. HOOKS: Your Honor, probably about 20 minutes or
3 so.

4 THE COURT: Okay. We're going to go ahead, then, and
5 take the lunch break. Counsel, is an hour enough, or do
6 y'all need more time?

7 MR. HOOKS: Oh. For me?

8 THE COURT: For the room. We're going to take the
9 lunch break now.

10 MR. HOOKS: Oh. Sorry, Your Honor.

11 THE COURT: It's about 12:15. Is an hour sufficient
12 from plaintiffs' side.

13 MS. BURRELL: Yes, it is.

14 THE COURT: Is that sufficient for the district?

15 MR. HOOKS: Yes, ma'am.

16 THE COURT: Court will be in recess. If we can have
17 everybody back here at 1:15, we'll get started back. All
18 right. Court will be in recess until then. Thank you all.

19 (A lunch recess was taken.)

20 THE COURT: All right. Counsel, are you all ready to
21 proceed?

22 MR. HOOKS: We are, Your Honor.

23 THE COURT: Dr. Stocks -- I keep wanting to say
24 Stokes, but Dr. Stocks, if you'll come forward for me,
25 ma'am. You can take the witness box.

1 THE WITNESS: Can I bring this water up here?

2 THE COURT: You may. And we're not going to swear
3 you back in. You're just still under oath. You may be
4 seated.

5 And you may proceed, Mr. Hooks.

6 MR. HOOKS: May I proceed, Your Honor?

7 THE COURT: You may.

8 BY MR. HOOKS:

9 Q. Dr. Stocks, what is a Blue Ribbon School?

10 A. That is a national recognition that is bestowed upon
11 public schools across our nation.

12 Q. And have any of the Rankin County Schools been
13 recognized as being Blue Ribbon Schools in recent years?

14 A. We currently have three that have received that
15 distinction in recent years. That would be Florence
16 Elementary, Northshore Elementary, and Brandon Elementary.

17 Q. And for what reason did Brandon Elementary receive
18 that designation, if you know?

19 A. For closing the achievement gap with their Black
20 student population.

21 Q. I see. And under whose principalship did that occur?

22 A. Vallerie Lacey.

23 Q. I see. Now, if you'll turn with me to D-63, I'm
24 going to ask if you recognize this document.

25 THE COURT: I think she has like mine where it says

1 "to be added." It's a blank sheet that says "to be added"
2 on D-63. It's okay. If you want to come back to that,
3 Mr. Hooks, you can. How voluminous is the exhibit?

4 MS. DOLE: It's not.

5 THE COURT: If you email it to our chambers box,
6 Ms. Cossar can print that and we can make multiple copies.

7 BY MR. HOOKS:

8 Q. Dr. Stocks, as Ms. Dole is putting this on the
9 screen, what is Exhibit D-63? Well --

10 THE COURT: You'll need to put it on the screen.
11 Hold on one second. Once she has it presented, we can --
12 make sure it's up.

13 And just make sure the room can't see it, Ms. Cossar.
14 Just the witness for now until it's admitted. There you go.

15 A. This document is a list of examples of good faith
16 efforts of the Rankin County School District.

17 BY MR. HOOKS:

18 Q. And who prepared this document?

19 A. I did in a collaborative effort with district
20 employees.

21 Q. All right. If you look here at the first entry, does
22 this concern extracurricular activities?

23 A. It does.

24 Q. All right. And do you see here under the first
25 entry, a fee waiver system has been implemented, and there

1 are improved communications about availability,
2 registration, websites for each school, and district
3 handbook and social media and parent meetings? Do you see
4 that?

5 A. Yes.

6 Q. And do you see -- what other items do you see here
7 with regard to what you've listed under extracurricular
8 activities?

9 A. At the district level, some good faith efforts have
10 included the fee waiver system, as you mentioned. Also, we
11 added in our district budget to support each school -- each
12 high school arts program. The request for assistance for --
13 from students and families to participate in programs have
14 reflected our arts programs, and so that was something that
15 we're proud we've been able to do. Also budget added to
16 support schools with student hardship needs as they arise.

17 Our policy -- JSV policy updated to include changes
18 with tracking the fee waiver request and fulfillment of
19 those. We are communicating our extracurricular
20 opportunities in multiple ways, and we have sent an interest
21 survey to our staff to expand opportunities for diverse
22 leadership and cosponsoring of different clubs and
23 organizations, and that was a good faith effort directly out
24 of a suggestion from either the DOJ or the LDF.

25 MS. BURRELL: Your Honor, I'm going to object to the

1 admission of this document. I know counsel has not moved
2 for it to be admitted yet, but the witness has already
3 testified as to much of what's contained in there, all of
4 which -- the majority of which is hearsay. I note that this
5 appears to be a document prepared for the purposes of
6 litigation. We heard comments about good faith efforts, the
7 same things that we heard in opening statements that go to
8 legal issues in this case. Essentially it appears this
9 document is going to the ultimate issue in this case, the
10 violation of federal rules, by having a lay witness testify
11 as to the ultimate issue in this matter.

12 THE COURT: Okay. Thank you.

13 Can you ask who prepared the document?

14 MR. HOOKS: Yes, ma'am.

15 BY MR. HOOKS:

16 Q. Dr. Stocks, can you state for the Court who prepared
17 this document?

18 A. I typed it, but it was in conversation with district
19 leadership and -- over the course of the years all the
20 things that we have done in response to requests for
21 information from both LDF and DOJ, but our district
22 leadership and -- as a result of all the things that we have
23 done in good faith -- not all the things. Most of the
24 things that we have done in good faith efforts around many
25 of these -- each of these *Green* factor areas.

1 MR. HOOKS: Your Honor, I would move to have exhibit
2 admitted as D-63.

3 THE COURT: Okay. Do you maintain your objection?

4 MS. BURRELL: I will maintain my objection. I do
5 just also want to add that this document, the first time we
6 saw it was when it was produced with the exhibit list. It
7 was not produced during discovery or anytime afterwards.

8 THE COURT: I'm going to overrule the objection.
9 D-63's admitted.

10 (Defendants' Exhibit 63 entered.)

11 BY MR. HOOKS:

12 Q. So in terms of extracurricular activities with regard
13 to district and students, do you see any other items to
14 bring to the Court's attention relative to why we're here
15 today?

16 A. Well, the things that I just listed were just
17 district efforts. There's also under -- as far as students
18 specifically, like students who qualify for the national
19 school lunch program or free and reduced lunch recipients,
20 they do not have to provide additional information when they
21 request hardships. So if they say that they have a hardship
22 situation and we recognize that they're a student who
23 receives free or reduced lunch, then we don't require any
24 additional information for them to be a recipient of that.

25 We have standardized rubrics for our tryout processes

1 for athletics and our arts programs that have tryouts. We
2 have physicals that are required of students for certain
3 athletics, and those are offered at no cost to any of our
4 students.

5 We communicate -- we have various methods for
6 communication about participation in tryout opportunities.
7 And then also we have noted that as our students are
8 entering the school -- or the grades where they become
9 eligible for participating in extracurriculars, some of the
10 efforts that we do, such as tours to those rising students,
11 open house, parent nights, and so forth.

12 Q. And if you'll look with me -- if you'll turn -- you
13 know keep your -- well, actually, you're looking at it on
14 the screen, but if you'll turn with me to Exhibit 51 in your
15 book.

16 Dr. Stocks, you had mentioned about -- something
17 about not requiring students to provide additional
18 information who are part of the free or reduced lunch
19 program. Does this form entitled "Rankin County School
20 District Financial Hardship Waiver Application" relate to
21 that?

22 A. It does.

23 Q. And do you recognize this as the document to which
24 you were referring?

25 A. Yes.

1 Q. And if you'll look with me over on -- a page or two
2 before, just so the Court has this in its entirety, is this
3 Exhibit D-51, do you also recognize this as a fee policy?

4 A. Yes.

5 Q. And you'll see on the next page, does it say fee
6 waiver reduction application?

7 A. It does.

8 MR. HOOKS: Your Honor, I would request at this time
9 that D-51 be moved into evidence as the district's exhibit.

10 THE COURT: Any objection?

11 MS. BURRELL: No objection.

12 THE COURT: All right. D-51 is admitted.

13 (Defendants' Exhibit 51 entered.)

14 BY MR. HOOKS:

15 Q. And if you'll look with me while you're there,
16 Dr. Stocks, at Exhibit D-52.

17 A. Okay.

18 Q. Okay. At the bottom of this page here, does it say
19 something about the fee waiver?

20 A. It does.

21 Q. What does it say?

22 A. The fee waiver is available on the RCSD athletic web
23 page. Individual school athletic pages, the RCSD online
24 enrollment platform, and parent/guardian consent form for
25 club and extracurricular participation. Additionally, it is

1 addressed during parent meetings regarding extracurricular
2 activities.

3 Q. All right. And if you'll look through here --

4 MR. HOOKS: I'd like to ask this exhibit be entered
5 as Exhibit D-52 for the defendants, but counsel opposite
6 might want more from the witness on what this is, and I'm
7 happy to ask the witness.

8 THE COURT: Any objection to D-52?

9 MS. BURRELL: No objection.

10 THE COURT: D-52 is admitted.

11 (Defendants' Exhibit 52 entered.)

12 BY MR. HOOKS:

13 Q. So if you'll look with me at the next page of this,
14 do you see at the bottom of this form this is entitled,
15 parent/guardian consent for club or extracurricular
16 participation? Do you see that?

17 A. I do.

18 Q. And what does it say at the very bottom of the form?

19 A. Read RCSD's fee policy here.

20 Q. So does this indicate to you this would have been
21 something online?

22 A. Yes.

23 Q. And then we talked about the next page, have we not?
24 Do you see --

25 A. I mentioned the hardship waiver opportunity.

1 Q. All right. And then look with me on page 130.

2 THE COURT: Of that same exhibit?

3 BY MR. HOOKS:

4 Q. I'm sorry. At the bottom of the page, there's an
5 RCSD Bates label 130. Do you see that?

6 A. I do.

7 Q. And does this appear to be an agenda schedule of
8 athletic director training?

9 A. It is. Dated June 9, 2023.

10 Q. And if you'll look with me, Dr. Stocks, do you see on
11 the second page of it where on number 5 there's something
12 discussing the financial hardship waiver policy and form?

13 A. Yes.

14 Q. And what does it say there?

15 A. It says, Parents need to know the process for
16 financial hardships. Please include the following.

17 Q. All right?

18 A. And link to financial hardship waiver policy,
19 financial hardship waiver form.

20 Q. And that appears to be an agenda from the June 9th,
21 2023, summer meeting agenda athletic directors? From the
22 first page you can learn that, can you not?

23 A. Correct.

24 Q. And then if you look with me on the next page, it
25 says at the top what? Athletic director what? Summer

1 meeting --

2 A. Summer meeting agenda, June 9, 2023.

3 Q. And same thing. Look at the second page of that.

4 Does it also have similar information regarding the
5 financial hardship waiver policy?

6 A. Yes.

7 Q. All right. And then if you look with me on D-53, do
8 you recognize this email?

9 A. Yes.

10 Q. All right. Does this indicate to you anything about
11 the communications of the district regarding this financial
12 hardship waiver policy?

13 A. It does.

14 Q. What does it indicate to you?

15 A. It indicates that even though there have been annual
16 summer meetings regarding extracurriculars, that midyear as
17 a follow-up Mr. Ben stein, our assistant superintendent over
18 secondary schools sent an email to the high school and
19 middle school principals and our athletic directors to --
20 shall I read it?

21 MR. HOOKS: All right. I would like to move that
22 exhibit into evidence also.

23 THE COURT: Tell me the number again.

24 MR. HOOKS: 53. D-53.

25 THE COURT: Any objection to D-53?

1 MS. BURRELL: No objection.

2 THE COURT: D-53's admitted.

3 (Defendants' Exhibit 53 entered.)

4 BY MR. HOOKS:

5 Q. All right. Returning to our exhibit on these good
6 faith efforts, if we could, on the screen.

7 A. Okay.

8 Q. Which is D-63. The next part of the exhibit deals
9 with faculty and staff assignment. Do you see this?

10 A. I do.

11 Q. Are these items that you and the administrative team
12 put together as further evidence of the good faith efforts
13 of the Rankin County School District?

14 A. Yes.

15 Q. All right. And there's a section in here on
16 curriculum development and human resources; is that right?

17 A. Yes. Those are the first two sections of our good
18 faith efforts towards -- regarding faculty and staff
19 assignment.

20 Q. All right. And on the second page, there's
21 discussion about the interviewing process. Do you see that?

22 A. I do.

23 Q. And then there's a section on job postings. Do you
24 see that?

25 A. I do.

1 Q. And then leadership discussions?

2 A. I do.

3 Q. And then minority recruitment committee. Do you see
4 that?

5 A. I do.

6 Q. And then if you'll look with me on the next page,
7 there's discussion here -- or description of the outside
8 speakers toward this effort of teacher and leader training
9 at various occasions. Do you see that?

10 A. I do.

11 Q. Were you a participant in any of these teacher
12 trainings or were you part of it in any way?

13 A. In all of them.

14 Q. So you can testify personally that these occurred?

15 A. I can.

16 Q. And did these trainings deal in some shape, form, or
17 fashion with cultural diversity and other issues of that
18 sort?

19 A. They did.

20 Q. And what was the importance of the district providing
21 these trainings?

22 A. It was to educate our faculty, our staff, on really
23 matters of the heart and recognizing that children learn
24 differently, recognizing that our public school district is
25 comprised of students from various cultures and ethnicities

1 and valuing those and educating our staff on cultural
2 sensitivity and celebrating diversity and things like that.

3 Q. All right. And then another topic here underneath
4 that one deals with these partnerships with institutes of
5 higher learning. I suppose that means with colleges, other
6 colleges; is that right?

7 A. In Mississippi, that is correct.

8 Q. All right. And these -- what is the purpose of these
9 partnerships?

10 A. Well, there's very -- there's value in lots of ways
11 of partnerships with our institutes of higher learning. We
12 recruit -- we build relationships to recruit teachers,
13 future educators in our district. We also want to partner
14 just as being someone who values the impact of education for
15 our state. We want to specifically with our -- not just
16 with our HBCUs, our historically black colleges and
17 universities, but with all of our universities in the state,
18 we want to partner and have over the years on efforts to
19 diversify our faculty and staff and also to just pour back
20 into future educators, whether we're going to do mock
21 interviews, like we have on Jackson State campus, or whether
22 it is to go talk to them about how to prepare for interviews
23 whenever they do that. Those kinds of things. It's also to
24 expose future educators to the Rankin County School District
25 and the quality of education that we can offer there.

1 Q. And you also have a section here on public relations
2 department. What is the nature of that entry?

3 A. Those are good faith efforts that we take in from
4 public relations, such as a recruitment video that
5 intentionally highlights our diverse educators and our staff
6 as we go out to recruit, creating flyers to share with
7 colleges and at career fair events and for our community
8 members to share with our affinity groups. We do that
9 through our minority recruitment committee. Also posting
10 our career fair not just on our school and district websites
11 but specifically our PR manager has -- this is really neat
12 that you can even do this, but had targeted radio ads to
13 targeted geographic locations, like, around Jackson State or
14 HBCUs, specific areas across our state to target our radio.
15 We've had television ads, newspaper. Also to be mindful of
16 our district posts that they are inclusive of the diversity
17 that our school district represents.

18 Q. And there's a section in here on retentions and
19 another on staff training and then teacher academies and so
20 on. So this -- these are concluding your good faith efforts
21 you've mentioned in the area of minority recruitment -- I'm
22 sorry -- in the area of teacher hiring and faculty
23 recruitment?

24 A. That is correct.

25 Q. And then you testified earlier, I believe, in your

1 introduction that you are the former HR director for the
2 district as well. Is that right?

3 A. That's correct.

4 Q. So in each of these areas that you've listed here,
5 you would have some direct familiarity, would you not?

6 A. Firsthand knowledge?

7 Q. Yes, ma'am.

8 A. Yes.

9 Q. And if you look here under student assignment, I
10 won't go through each of these, but have you listed here in
11 summary fashion many of the same items that you've testified
12 about earlier today with regard, for example, to advanced
13 placement?

14 A. Our standardized fee waiver system, our --
15 communicating our information, our policy, yes. These are
16 things we've talked about regarding advanced placement, dual
17 credit, gifted program, honors classes.

18 Q. And with regard to sharing information over time,
19 now, there was some discussion earlier about your
20 involvement or participation in providing or sharing
21 information to the Department of Justice and to the Legal
22 Defense Fund attorneys; is that correct?

23 A. That's correct.

24 Q. Were you part of those efforts in many instances, or
25 at least the ones listed here, to gather that information,

1 Dr. Stocks?

2 A. Since -- in one way or another, since in 2016 I was a
3 principal at the visit and then since 2018 coming on board
4 as the HR director for the district, I've been directly
5 involved in data collection, data review, consideration of
6 recommendations and changes that we've made in good faith
7 efforts.

8 Q. I see. And when you look here under these, you see
9 annual court reporting? Do you participate in gathering
10 that information also?

11 A. It depends -- it depends on what information it is.
12 It's Crystal Creel, our data management, and our -- Anitra
13 Hollis, our HR director, are the primary sources of that
14 data that we provide to the court. So when I was HR
15 director, yes, but now that would fall with Ms. Hollis in
16 her department.

17 Q. And if you look down here, in addition to these
18 document requests, there's an entry entitled concerned
19 citizen group meetings. Do you see that?

20 A. I do.

21 Q. What is that entry about?

22 A. It's -- it may not be an exhaustive list, but it is a
23 list of meetings that we've had with concerned citizens over
24 the years where I had a sign-in sheet or some documentation
25 and that's just representation of our coming together to

1 hear what our citizens are concerned about and take what
2 they're saying and listen and see if there's something that
3 we can do better or additionally that we weren't doing
4 before said meeting on each occasion.

5 Q. And is it your testimony that district officials
6 attended these meetings and listened to the concerns that
7 were expressed?

8 A. Yes.

9 Q. And then you've got another bullet point that deals
10 with the sample of efforts with HBCUs and so forth regarding
11 career fairs. Do you see that?

12 A. I do.

13 Q. And is Alcorn State listed there?

14 A. It is.

15 Q. And just for the record, is it an HBCU?

16 A. It is.

17 Q. And are efforts that the district has undertaken
18 relative to Alcorn State University listed there?

19 A. There are.

20 Q. And Jackson State is listed there as well?

21 A. It is.

22 Q. And is, just for the record, Jackson State University
23 an HBCU also?

24 A. It is.

25 Q. And if you look with me on the next page, there's

1 entry related to Tougaloo College; is that right?

2 A. Correct.

3 Q. And Tougaloo College is also an HBCU; is that right?

4 A. Correct. That's correct.

5 Q. Now, this list that you prepared is -- you said it's
6 not an exhaustive list; is that right?

7 A. That's right.

8 Q. And there are other good faith efforts the district
9 might have undertaken as well?

10 A. Correct.

11 Q. Dr. Stocks, in the position of leadership you are, do
12 you have an opinion about whether you believe the district
13 will continue undertaking many of these good faith efforts
14 in the future?

15 A. I'm convinced that the district will continue to do
16 what we're doing and even more.

17 Q. And how do you -- or why do you feel that way?

18 A. Because our staff that I work with all have the same
19 heart and mindset around this body of work, that we want to
20 provide access and opportunity to all of our students and
21 help our students to be successful in whatever they
22 endeavor.

23 Q. Do you believe --

24 A. And as well as our staff.

25 Q. Yes, ma'am. Do you believe these efforts you've

1 summarized here on this exhibit are an integral part of the
2 school district's success today?

3 A. I do.

4 Q. And you see no reason why the district does not
5 continue -- or will not undertake to continue good faith
6 efforts in this regard; is that what you're telling the
7 Court?

8 A. I'm telling the Court that everything that we're
9 doing we do because we believe it's what is right for not
10 only our students but also for our staff. And I actually
11 appreciate the process that I've been involved in over all
12 of these years because things have been brought to our
13 attention that we've acted on in good faith and have
14 improved our school district that's already a top-rated
15 school district and already known and recognized for certain
16 things, but these are ways that we can make improvements not
17 just for our Black student population but for access and
18 opportunity for all of our students.

19 MR. HOOKS: Thank you, Dr. Stocks. I have no further
20 questions.

21 THE COURT: All right. Thank you.

22 Counsel, I understood that y'all need some IT help.
23 Do you need it before cross on this witness?

24 MS. BURRELL: I believe that we are good to go, Your
25 Honor. I would just ask before I begin my

1 cross-examination, Dr. Stocks was a witness listed on our
2 list as well. I'd ask for permission to go beyond the scope
3 of cross-examination just so we don't have to recall her. I
4 don't think it will be on many issues.

5 THE COURT: That's fine.

6 MS. BURRELL: Thank you.

7 THE COURT: And while you're coming to the podium,
8 Ms. Burrell.

9 Counsel, if you will, the microphones are picking up
10 your conversations, and so I can hear y'all, so just make
11 sure that when you are conferring, write notes or truly
12 whisper, because I can hear y'all.

13 MR. HOOKS: Yes, Your Honor.

14 **CROSS-EXAMINATION**

15 **BY MS. BURRELL:**

16 Q. Good afternoon, Dr. Stocks.

17 A. Good afternoon.

18 Q. So you talked a bit about your role previously as an
19 HR director in the district; right?

20 A. Correct.

21 Q. And so as an HR director, you dealt a lot with data;
22 right?

23 A. Correct.

24 Q. And we talked a lot already about data today; right?

25 A. We have.

1 Q. Would you agree that data is helpful because it can
2 help show trends?

3 A. Data can show trends.

4 Q. And it can show what's working and what's not
5 working?

6 A. It can. It can be part of a picture for sure.

7 Q. And is it fair to say that generally the more data,
8 the better?

9 A. Say that question again.

10 Q. Yeah. Would you agree that, generally speaking, the
11 more data you have, the better to observe trends?

12 A. The more data you have? That could be -- that could
13 be true.

14 Q. And we talked a bit about policies that this district
15 has; right?

16 A. We have talked about some policies.

17 Q. Many of these policies are in the student handbook?

18 A. Are you asking me? I'm sorry.

19 Q. I'm asking you are many of these policies in the
20 student handbook?

21 A. We do have some policies referenced in our student
22 handbook.

23 Q. If you could look at, I believe, D-65, which is not
24 yet in evidence, and -- yeah.

25 THE COURT: I have it in evidence.

1 MS. BURRELL: Oh. It is. Okay.

2 BY MS. BURRELL:

3 Q. So D-65. Is that -- that is the student handbook;
4 right?

5 THE COURT: I think that's D-64.

6 A. D-64.

7 THE COURT: And that is not in evidence.

8 MS. BURRELL: Okay. I apologize.

9 THE COURT: It's okay.

10 BY MS. BURRELL:

11 Q. D-64, do you recognize that document?

12 A. Student handbook for the 2025-2026 school year.

13 Q. And is that a fair and accurate representation of the
14 student handbook for this school year?

15 A. Yes.

16 MS. BURRELL: I'd ask that D-64 be admitted into
17 evidence.

18 THE COURT: Okay.

19 MR. HOOKS: No objection.

20 THE COURT: All right. D-64 is admitted.

21 (Defendants' Exhibit 64 entered.)

22 BY MS. BURRELL:

23 Q. The student handbook is where students and parents
24 can go to find information; right?

25 A. It is one of the places, yes.

1 Q. And you can find information on everything from fees;
2 correct?

3 A. Yes.

4 Q. To attendance policies; right?

5 A. Yes.

6 Q. And these policies are subject to change by the Board
7 of Education; correct?

8 A. We actually have a schedule where we review policies
9 by section, and each -- a month a designated to a section
10 for policy review, so throughout the year, not that you
11 couldn't change a policy outside of that section for that
12 month, but that is the system or the rhythm to how we review
13 our policies in an ongoing manner for the Rankin County
14 School District.

15 Q. And it's the school board who ultimate votes on
16 whether a policy is approved; right?

17 A. Correct.

18 Q. I want to switch now to talk about student
19 enrollment. I know we talked a bit about it on direct
20 examination, but if you could look at D-13 for a few
21 questions that I have for you.

22 THE COURT: And I'll just note for the record that
23 that is in evidence.

24 MS. BURRELL: Thank you, Your Honor.

25 BY MS. BURRELL:

1 Q. So if we look at page 8 of D-13, we see the student
2 population for White students in 2020 was 67.52?

3 A. I'm sorry. My pages are not numbered.

4 Q. Oh.

5 A. So what page did you say?

6 Q. So it's page number 8, so toward the end of that
7 document, and we're looking at the White student population
8 district -wide?

9 THE COURT: Okay. Mine doesn't have eight pages.

10 A. Mine doesn't either.

11 MS. BURRELL: Oh. I think it's because -- sorry --
12 it was probably single-sided -- or double-sided.
13 Single-sided when I printed it.

14 BY MS. BURRELL:

15 Q. How about this? Just look at the data for the school
16 year of 2020 through 2021, and it's the last page. If you
17 can look at the White student population district-wide. And
18 you would agree that the White student population in the
19 school year of 2020-2021 was 67.52 percent; correct?

20 A. Yes.

21 Q. Now, if we flip to the White student population for
22 this current academic school year, 2025-2026, and that is
23 going to be on the second page of this document, we see that
24 the total White student population for this academic school
25 year was -- or is 62.2 percent; correct?

1 A. That is correct.

2 Q. And so what we see is that the percentage of White
3 students is decreasing; right?

4 A. It has.

5 Q. And now, if we look at these numbers -- or if we look
6 at -- if we look at the data for the 2020 school year and we
7 look at the percentage of Black students district-wide in
8 2020 -- we're going to go back to that very last page --
9 we'll see that the Black student population in 2020 was
10 24.87 percent; right?

11 A. Correct.

12 Q. And we jump back to the current student population
13 this academic school year and we see that it has increased;
14 right?

15 A. It has.

16 Q. And it is now, I believe, 28.9 percent?

17 A. Correct.

18 Q. And so what we see is that the district, I think as
19 you stated on direct examination, is growing more diverse;
20 right?

21 A. Well, we didn't speak to the other races column, but
22 it has also increased.

23 Q. Sure. And the other races columns are non-White
24 students; right?

25 A. Or it could be a multirace student.

1 Q. So a White student -- a student who is biracial,
2 right, potentially?

3 A. Potentially.

4 Q. You would agree that the student population in 2025
5 is more diverse compared to the student population in Rankin
6 County in 2020?

7 A. Yes.

8 Q. Now, let's talk about some of the racially
9 identifiable schools in 2020 compared to 2025. So we went
10 over -- or on direct examination you went over the 2012
11 consent order, which I believe is Exhibit D-4, right, which
12 is in evidence?

13 MR. HOOKS: Your Honor, I hate to interpose an
14 objection a little late on this, but I object to the
15 characterization of these schools as racially identifiable.
16 The witness certainly hasn't described them that way.

17 THE COURT: I'll overrule the objection. You know
18 proceed.

19 We're on D-4, Dr. Stokes -- Stocks. Sorry.

20 THE WITNESS: That's fine.

21 THE COURT: I'll get it right before it's over.

22 BY MS. BURRELL:

23 Q. And if we turn to paragraph 8, I believe, of the 2012
24 consent order -- one moment. Actually, paragraph 7 of the
25 2012 consent order, we read, like we went over on direct

1 examination, that, pursuant to this consent order, the
2 percentage of White students at each school within RCSD
3 shall be within 20 percent above or 20 percent below the
4 overall percentage of White students attending Rankin County
5 School District schools; right?

6 A. That sounds right, but I don't -- I'm not following
7 where you said you were in reading that on page 8.

8 THE COURT: What page are you on, Ms. Burrell?

9 MS. BURRELL: Sure. I am on page 8 of the 2012
10 consent order.

11 THE COURT: So D-4.

12 MS. BURRELL: D-4. And paragraph 7, and it's in the
13 middle of paragraph 7.

14 A. Yes.

15 BY MS. BURRELL:

16 Q. And in 2020, as you told us on direct examination,
17 all the schools met this requirement; right?

18 A. Correct.

19 Q. Now, I know we're jumping around a lot, but let's
20 just jump to D-13 to look at which schools were in
21 compliance and which were not in this academic school year,
22 2025 to 2026.

23 THE COURT: And D-13 is in evidence.

24 MS. BURRELL: Yes. Thank you, Your Honor.

25 BY MS. BURRELL:

1 Q. So if we look at D-13 -- one moment -- page 2, we
2 know that the total White student population this year is
3 62.6 percent; right?

4 A. Right.

5 Q. And we know that Pisgah High is not in compliance
6 this year; correct?

7 A. Are you talking about the White student population?

8 Q. That's correct. That the White student population is
9 above the plus or minus 20 percent range required by the
10 2012 consent order?

11 A. So Pisgah HIGH school is at 84.4 percent, and the
12 upper range is at 82.6 percent.

13 Q. And so Pisgah High School is not in compliance;
14 correct?

15 A. I believe it is. It's slightly outside of the range.

16 Q. Well, the consent order requires that no school be
17 outside the plus or minus 20 percent range of -- of the
18 total White student population; right?

19 A. Correct.

20 Q. And the total White student population is
21 62.6 percent; right?

22 A. Say that again. Are you talking about for Pisgah
23 High School?

24 Q. Yeah. No. I'm talking about the total White student
25 population district-wide.

1 A. Correct.

2 Q. And Pisgah High School, the student population --
3 White student population is 84.4 percent; right?

4 A. Correct.

5 Q. So Pisgah High School is not in compliance; right?

6 A. Again, I do not believe that Pisgah High School is a
7 racially identifiable school. I do see that the numbers are
8 slightly out of that range.

9 Q. Sure. My question was: Is Pisgah High School in
10 compliance with the 2012 consent order that requires that
11 the student population for White students must be within the
12 plus or minus 20 percent -- must be within plus or minus 20
13 percent of the total school district population for White
14 students?

15 A. I think it is to the extent practical.

16 Q. So you think that 84.4 percent is within plus or
17 minus 22 percent of 62.6 percent?

18 A. That's not what I just said.

19 Q. So that's my question, though. Is it within the plus
20 or minus 20 percent range?

21 A. Pisgah High School is not within the plus or minus
22 20 percent range.

23 Q. My next question is whether Pisgah Elementary School
24 is within the plus or minus 20 percent range as required by
25 the 2012 consent order.

1 A. We're looking at which school again?

2 Q. We're looking at Pisgah Elementary School.

3 A. So Pisgah Elementary School is at 83.2 percent, and
4 the White population as a whole is at 62.6 percent, and the
5 range -- the top end of the range for White students is at
6 82.6 percent.

7 Q. So Pisgah Elementary School is outside of the range;
8 correct?

9 A. Slightly, yes.

10 Q. Okay. And we're just going to go through them one by
11 one quickly. Florence Middle School is also not in
12 compliance with the 2012 consent order with respect to the
13 White student population being outside the plus or minus
14 20 percent range; correct?

15 A. So Florence Middle School is at 84.1 percent, and the
16 upper end of the range, again, is at 82.6 percent.

17 Q. So not in compliance; right?

18 A. It is not within that range.

19 Q. And same with Florence Elementary for the White
20 student population, which this year was at 83.7 percent;
21 right?

22 A. That is above the 82.6 percent, out of that top end
23 of the range.

24 Q. And the last one, we see that Flowood is below the
25 plus or minus 20 percent range as required by the consent

1 order because the student population is 41.3 percent; right?

2 A. The low end of the range is 42.6 percent, so when you
3 look at Flowood Elementary at 41.3 percent, it is slightly
4 below the bottom end of that range.

5 Q. So this academic school year, there are five -- five
6 schools that are not in compliance with this section of the
7 consent order, right, of the 2012 consent order?

8 A. These schools are slightly outside of that range.

9 Q. And not in compliance; right?

10 A. They're slightly outside of the range of what the
11 Court determines for them to be at plus or minus 20 percent.

12 Q. You would agree that student enrollment is driven by
13 attendance zones, right, in part?

14 A. Yes.

15 Q. And there are exceptions where a student may attend a
16 school outside of their attendance zone; correct?

17 A. Correct.

18 Q. And we talked about one of those exceptions with
19 respect to intradistrict transfers; right? Or you talked on
20 direct examination about --

21 A. I did.

22 Q. And so I want to look at what is already in evidence,
23 I believe, as D-15. And if you could, read that first
24 sentence of the second paragraph starting with "transfers of
25 students within the district."

1 A. Read the first sentence.

2 Q. Yes. Just that first sentence.

3 A. "Transfer of students within the District shall be
4 permitted by action of the Board of Education only in
5 exceptional cases, unless the family of the pupil has
6 removed its residence from one attendance zone to another."

7 Q. And you testified on direct examination that
8 transfers contribute to about 2 to 3 percent of the student
9 population; right?

10 A. Correct.

11 Q. So I want to look at some transfer numbers. So if we
12 can turn to D-17, and if you can take a look at --

13 THE COURT: And that's not in evidence yet.

14 MS. BURRELL: Yes. I will --

15 THE COURT: Sorry.

16 MS. BURRELL: Oh, no worries. I'll seek to admit it
17 once we take a look.

18 A. Okay. I'm there.

19 BY MS. BURRELL:

20 Q. Dr. Stocks, have you seen this document before?

21 A. This looks like the 2022-20 23 list of student
22 transfers.

23 Q. And you've reviewed these transfer numbers in the
24 past in a past deposition; correct?

25 A. I did talk about transfers in my past -- in my

1 deposition.

2 Q. Does this appear to be a fair and accurate
3 representation of data related to the 2022-2023 student
4 transfers in the district?

5 A. It does.

6 MS. BURRELL: Okay. I'd ask that D-17 be admitted
7 into evidence.

8 THE COURT: Any objection?

9 MR. HOOKS: No objection, Your Honor.

10 THE COURT: D-17 is admitted.

11 MS. BURRELL: Thank you.

12 (Defendants' Exhibit 17 entered.)

13 MS. BURRELL: I'm going to ask my paralegal to pull
14 up D-17, the -- I believe the Excel spreadsheet version.
15 Okay. And if we could go all the way to, I believe, that
16 first sheet, sheet 1.

17 And, Ms. Stocks, if you can just bear with me.

18 I would like to select -- looking at column D, select
19 transfer to and select Pisgah High School. I think we might
20 actually have to go to column C and deselect. Do select
21 all. Thank you. No, do select all. Nope. Nope. Column C
22 should be select all. And -- no. Sorry. You want to --
23 there's a -- there's two letters there that you need to
24 delete for column C. That's why it's like that.

25 Column D, if you can do select all -- sorry. If you

1 can unselect select all and choose Pisgah High School. And
2 if we move on to column I -- let's see -- column transfer
3 to -- column I for type and solely select intradistrict
4 transfers, the ones that begin with intra and also intra
5 continuation, please.

6 BY MS. BURRELL:

7 Q. So, Dr. Stocks, I know there was a lot of movement on
8 the screen, but I'll represent to you that we have selected
9 all of the 2022-2023 student transfers where there was a
10 transfer into Pisgah High School and that these are
11 intradistrict only transfers.

12 Now, if we look at column F, Dr. Stocks, can you just
13 tell us what it says right below column F?

14 A. Ethnicity.

15 Q. And is that to indicate the ethnicity of the student
16 who transferred into the school?

17 A. Yes.

18 Q. And if we scroll down, would you agree that it
19 appears that only one Black student transferred into Pisgah
20 High School?

21 A. That is correct.

22 Q. And it might be a little bit difficult to count, but
23 would you agree that 24 White students transferred into
24 Pisgah High School? And we can scroll all the way down so
25 you can see it.

1 A. I can't see the whole screen, but you're representing
2 to me that it's how many again?

3 Q. Twenty-four White students.

4 A. Twenty-four. Okay.

5 Q. So now if we can go -- and so is it fair to say that
6 in total 25 students transferred into Pisgah High School via
7 intradistrict transfers in the school year of 2022-2023?

8 A. That's what this is showing, yes.

9 Q. Now we're going to jump back to D-13 one final time,
10 I believe, and we're going to look at student enrollment at
11 Pisgah High School in 2022-2023.

12 MS. BURRELL: For the academic school year of
13 2022-2023. If you could scroll up a little, we can see --
14 okay.

15 BY MS. BURRELL:

16 Q. And is it accurate to say that if we're looking at
17 the right page --

18 MS. BURRELL: Sorry. You want to scroll down one
19 more page. Look at Pisgah High School.

20 BY MS. BURRELL:

21 Q. -- that Pisgah High School in 2022-2023 had 430
22 students?

23 A. Say that again.

24 Q. In the academic school year of 2022-2023, in total
25 there were 430 students at Pisgah High School?

1 A. Correct.

2 Q. Twenty-four White students, we already established,
3 transferred into Pisgah High School; correct?

4 A. Correct.

5 Q. And so if we do 24 divided by 30 -- I know you might
6 not have a calculator, but if we need one -- I'll represent
7 that represents 5.58 percent of the total student
8 population.

9 A. Is that a question?

10 Q. Yes. Do you agree -- well, do you agree that that
11 represents 5.58 -- 5.58 percent of the total student
12 population?

13 A. If you calculated that, then I can agree to that.

14 Q. Would you agree that transfers into Pisgah High
15 School that year made the school more White?

16 A. I'm glad that you asked this question, because I
17 actually looked at our transfers in the Pisgah zone. I
18 looked at the teacher -- students who maybe their parent
19 lived in Florence and they are working at Pisgah so they
20 took their child with them. I looked at that, and I looked
21 at the impact of that on the racial composition. Actually,
22 it was the elementary school, but we're in that zone. We're
23 talking about it, the same concerns, the same points. And
24 with Pisgah Elementary, if you didn't allow any teacher or
25 employee -- because that could be a cafeteria worker, it

1 could be a custodian, it could be a secretary. If you
2 didn't allow any employee that's driving to the rural Pisgah
3 community across our county to work there -- to take their
4 child with them to school there, you may find yourself
5 squeaking into the range that this plus or minus 20
6 requires, but then your --

7 Q. And apologies to interrupt, Dr. Stocks.

8 MS. BURRELL: I'd actually move to strike as
9 nonresponsive, and I can re-ask my question.

10 THE COURT: I'm going to overrule that. But you can
11 ask your next question, and if she wants to provide more,
12 she can provide it on redirect.

13 MS. BURRELL: Sure.

14 BY MS. BURRELL:

15 Q. So for Pisgah High School that next year, that next
16 academic school year, '23-'24, as you told us earlier on
17 cross-examination and on direct examination, it was a school
18 outside the plus or minus 20 percent range of White students
19 in the district; right?

20 A. You're saying for Pisgah High School for the '25-'26
21 school year?

22 Q. No. For the year after -- sorry. The year after
23 looking at the intradistrict transfers that we just looked
24 at, so in '23-'24 that Pisgah High School was outside -- was
25 above the plus or minus 20 percent range?

1 A. That's right. At 86.3.

2 Q. So I am going to shift topics for a moment, and I
3 want to talk a bit about course enrollment. So enrollment
4 for courses occurs for students second semester; is that
5 right?

6 A. For our secondary students.

7 Q. Yes.

8 A. They start listing on their preregistration forms
9 that they take home and talk to their parents about what
10 they would like to take for the upcoming school year. That
11 happens in the spring.

12 Q. Okay. So spring is second semester; is that right?

13 A. Correct.

14 Q. Okay. And the academic school year ends in May;
15 right?

16 A. Correct.

17 Q. Okay.

18 A. Except for extended school year students who
19 participate over the summer for summer school.

20 Q. Okay. If we can pull up District Exhibit Number 19,
21 which I believe is already in evidence.

22 So we talked about some changes to policies in recent
23 years, I think one being the change to the requirement for
24 CCR seventh grade compacted math; right?

25 A. You said changes in -- what was your statement?

1 Q. Yes. The requirements to enter into CCR seventh
2 grade math, you talked about that on direct examination;
3 right?

4 A. Correct.

5 Q. And you talked about how even if a student does not
6 qualify under what's required under A or B, that they can
7 submit a request for enrollment and that this request may be
8 approved at the discretion of the principal; right?

9 A. Correct.

10 Q. And that's the same for CCR eighth grade compacted
11 math; right?

12 A. Correct.

13 Q. This policy was implemented in 2025; right?

14 A. Correct.

15 Q. And so this policy went into place for the first time
16 this academic school year; right?

17 A. That is correct.

18 Q. Now, let's look at honors English, geometry, and
19 algebra. So here on the second page of D-19, it lists the
20 requirements for different honors classes; right?

21 A. Correct.

22 Q. And for honors English, it similarly says that there
23 are two prerequisites, but even if you fail to meet those
24 prerequisites, a parent or guardian may submit a formal
25 request to be considered for enrollment; right?

1 A. Correct.

2 Q. This policy just went into effect this academic
3 school year; right?

4 A. It did. And it came out of a good faith effort to
5 improve access.

6 Q. And we talked earlier about data; right?

7 A. We did.

8 Q. And that when you have a lot of data, you can start
9 to see trends; right?

10 A. Correct.

11 Q. There's not much data for this new policy.

12 A. I'm glad you asked that. I actually did reach out as
13 a follow-up from us implementing this this school year
14 because I wanted to know what kind of impact it had for our
15 students.

16 Q. Yes. So my question is --

17 A. So I have --

18 Q. -- about the --

19 MR. HOOKS: Your Honor, if she may be permitted to
20 answer the question. She was directly asked to explain
21 this, and now she's being cut off. I understand the
22 attorney doesn't like what she's saying.

23 THE COURT: Okay. Hold on. I know. Just what's
24 your objection and let me rule on it?

25 MR. HOOKS: That she's entitled to complete her

1 answer.

2 THE COURT: You know complete your answer, but I will
3 ask, answer the question that's asked, and if you want to
4 expound on that, you can in redirect. But do listen to the
5 question, answer the question that's asked, and we'll be
6 able to go a little bit quicker.

7 But you may finish your response now.

8 THE WITNESS: Yes, Your Honor. Thank you. I was
9 just stating that I did -- with it being a new process, as
10 you mentioned, and I responded to you that I did look at it
11 as a follow-up because we don't want to just say we're doing
12 something and not look into it and follow up to see the
13 impact of it.

14 BY MS. BURRELL:

15 Q. Okay. Great. Thank you. And the same for advanced
16 placement classes, right, the requirements to take an
17 advanced placement course? And I'll ask an actual question.
18 Apologies.

19 Prior to 2025, you needed teacher approval for
20 certain AP courses; right?

21 A. It was a teacher recommendation.

22 Q. But you needed teacher recommendations for certain AP
23 courses prior to 2025; right?

24 A. Correct.

25 Q. And the policy just changed where that is no longer

1 required; right?

2 A. Correct.

3 Q. Now, I want to ask a few questions now about dual
4 enrollment, so if we could turn to, actually, D-64 now, and
5 I believe page 40 of D-64.

6 A. What is the topic?

7 Q. D-64 I believe should be the student handbook.

8 A. My pages aren't numbered. I'm sorry. I'm trying to
9 find exactly where you want me to go.

10 Q. Oh, yeah. Okay.

11 MS. BURRELL: If we could get it on the screen when
12 you get a chance. Thank you.

13 BY MS. BURRELL:

14 Q. Okay. So you talked about the dual enrollment
15 program; right?

16 A. Right.

17 Q. And in talking about some of your good faith efforts
18 that the district is doing, the dual enrollment program was
19 one of the programs that you testified about; right?

20 A. Correct.

21 Q. And you told us a bit about providing funding for
22 students in the dual enrollment program who might have a
23 financial hardship; right?

24 A. Who might have a financial hardship, yes.

25 Q. Now, if we look at the student policy handbook and

1 the information with respect to the dual enrollment program,
2 it states, "It is the responsibility of students to meet
3 admission requirements of the institution and pay all fees
4 required by the college for credit"; right?

5 A. It does state that.

6 Q. And it also states that textbook costs for the
7 college course are the responsibility of the parent and/or
8 student; right?

9 A. Correct.

10 Q. And nowhere in this student handbook where they talk
11 about dual enrollment do they indicate that there are --
12 that fees can be covered for those who might not be able to
13 afford it; right?

14 A. Not on this page that I'm looking at, it does not.

15 Q. So I want to jump now to talking about the Venture
16 program. Now, you told us on direct examination that the
17 Venture program now allows for gifted students -- now allows
18 for math screening in first and second grade for gifted
19 students; right?

20 A. Correct.

21 Q. This policy was implemented in the '21-'22 academic
22 school year; right?

23 A. I believe that's correct.

24 Q. And so for students who were in third grade or above
25 in '21-'22, they were not impacted by this new policy

1 change; right?

2 A. Correct.

3 Q. Now, you also talked about the district's efforts in
4 diversifying the makeup of the gifted teachers; right?

5 A. Correct.

6 Q. And it sounds like prior to this school year, when
7 you were looking for teachers to teach the gifted Venture
8 program, you looked internally within the school district;
9 right?

10 A. They could have been posted externally, but it's now
11 required that they're all posted externally.

12 Q. And this requirement just went into effect this
13 school year; right?

14 A. This past hiring season.

15 Q. Okay. And the result of this was that you were able
16 to hire a Black teacher to teach the gifted Venture program;
17 right?

18 A. Correct.

19 Q. Prior to that, there was one other Black teacher who
20 was teaching the Venture program; right?

21 A. I believe that's right.

22 Q. And so now there's two?

23 A. I think one left late this summer.

24 Q. Okay.

25 A. So we haven't improved our percentage, but we were

1 able to recruit somebody externally.

2 Q. So now there's one Black teacher teaching the gifted
3 Venture program?

4 A. I believe that's correct. I would have to look.
5 Honestly, I don't know.

6 Q. Okay. On direct examination, you talked a bit about
7 communicating to parents about the Venture program; right?

8 A. Correct.

9 Q. Making sure that they are aware about this program
10 and how their student -- how their child may qualify; right?

11 A. Correct.

12 Q. There is a Venture parent advisory board? Or is
13 there a Venture parent advisory board?

14 A. I don't know.

15 Q. Okay. Would taking a look at the gifted handbook for
16 the '25-'26 school year refresh your memory?

17 A. If it states that we do, then my assumption would be
18 that we do.

19 Q. Do you know the racial --

20 A. I'm not a part of that committee, so I don't have
21 firsthand knowledge of that.

22 Q. So you don't know the racial makeup of the parental
23 advisory board -- the Venture parent advisory board; right?

24 A. I do not.

25 Q. If we could go to D-25, which is already in evidence,

1 and take a look at that. I believe it's D-25. One moment.

2 THE COURT: It's not D-25.

3 MS. BURRELL: No, it's not. Sorry.

4 BY MS. BURRELL:

5 Q. We talked about the special considerations checklist,
6 right, for the gifted -- or for the Venture program; right?

7 A. I did.

8 Q. Okay. And --

9 THE COURT: It's D-24, Ms. Burrell.

10 MS. BURRELL: D-24. Thank you.

11 BY MS. BURRELL:

12 Q. And so basically the way it works is if a student
13 falls within the 84th to 90th percentile, they can still be
14 considered for the Venture program through potentially this
15 special considerations checklist; right?

16 A. On the screener, if they fall between the 84th and
17 89th percentile, then we would use the special
18 considerations checklist to be able to move a student
19 forward to the IQ test and other steps.

20 Q. And in order to move forward to the next step, the
21 student must satisfy five or more of the criteria listed
22 below Option II; right?

23 A. If we're going with Option II. If we're going with
24 Option I, then you just move on.

25 Q. So for Option II, they must meet five or more of the

1 criteria listed below; right?

2 A. Correct.

3 Q. And I won't go through all of them, but I just want
4 to talk about a few of them. So one is the student has poor
5 reading skills; right?

6 A. Are you on the first one?

7 Q. Oh, no. I jumped all the way down to the student has
8 poor reading skills, towards the bottom.

9 A. I see it there.

10 Q. Another one states cultural values may be in conflict
11 with dominant values; right?

12 A. I see that one.

13 Q. Another one states there is a lack of access to
14 cultural activities within the dominant culture; right?

15 A. I see that one.

16 Q. You'd agree that these are fairly subjective
17 criteria; right?

18 A. Yes. The MDE regulations state that you use both
19 subjective and objective as part of the process. And so
20 this is a document from the Mississippi Department of
21 Education. This isn't a Rankin County School District
22 checklist.

23 Q. And even after -- even if a student meets five or
24 more of these criteria under Option II, they still have
25 additional assessments before they enter into the program;

1 right?

2 A. The parent would then be given a Humble -- I can't
3 remember the exact name. "Humble" is in the name of the
4 checklist that goes to the parent. The SIGS-2 goes to a
5 teacher. I will say this: It's a practice of the district
6 if the -- for whatever reason, if the teacher rating on the
7 SIGS-2 is not -- it would never become a barrier for a child
8 not getting it. We would ask another teacher or principal
9 or someone else in the building to rate them, so that they
10 could get that teacher portion to help them move on. And
11 then the IQ test would be next.

12 Q. Okay. So there's more testing after this?

13 A. The teacher checklist, the parent checklist, and then
14 the IQ testing itself.

15 Q. Okay. So I want to move on to talking a bit about
16 faculty now. Dr. Stocks, you would agree that improving the
17 diversity of staff or faculty will -- may help improve
18 diversity of students; right?

19 A. In theory. I mean, student population comes from
20 where families decide to live, but I understand what you're
21 asking me about families feeling welcomed by seeing teachers
22 that look like their children.

23 Q. And one of the programs that the district has is the
24 RISE mentorship program; right?

25 A. Correct.

1 Q. This program is a three-year mentorship program?

2 A. Correct.

3 Q. And it is designed to mentor teachers with zero to
4 three years of teaching experience; right?

5 A. Correct.

6 Q. Now, the mentor program, the way it works is a new
7 teacher is paired with a teacher who has worked in the
8 district for a couple of years already; right?

9 A. Correct.

10 Q. And if you are a teacher or mentor, there are certain
11 expectations if you are part of this RISE program; right?

12 A. Traditionally. Since the onset of the RISE program
13 this year instead of a current teacher being a teacher
14 mentor to a new teacher, we have retired teachers that are
15 mentoring our new teachers as part of the RISE program.

16 Q. Understood. And is it all retired teachers mentoring
17 the mentees?

18 A. Well, an exception would be Dr. Melissa McCray, who's
19 our curriculum director, who is mentoring some, or someone
20 from our elementary curriculum department who may be
21 mentoring some. It's the supply and demand of retired
22 teachers that are willing to come help us in this way and
23 the number of new teachers that we have, being the second
24 largest district in the state of Mississippi.

25 Q. Understood. And if we could take a look at District

1 Exhibit 45, which is not yet in evidence.

2 A. Okay.

3 Q. And do you recognize this document?

4 A. I do.

5 Q. And is this the '24-'25 elementary RISE Institute
6 packet?

7 A. Correct.

8 Q. Okay. Is this a fair and accurate representation of
9 the RISE Institute packet?

10 A. Yes.

11 Q. Okay.

12 MS. BURRELL: I'd ask that this be placed into
13 evidence, admitted into evidence.

14 THE COURT: Any objection?

15 MR. HOOKS: No objection.

16 THE COURT: All right. D-45 is admitted.

17 (Defendants' Exhibit 45 entered.)

18 BY MS. BURRELL:

19 Q. And if we could also look at D-46, have you seen this
20 document before? I'll give you a second. Sorry.

21 A. It doesn't have a label, but I'm assuming it's the
22 mentor teacher pairing from -- I'm not sure which year.

23 Q. Yes. This -- yes. This is the -- let's see. One
24 moment, actually. I can tell you what year.

25 Okay. Great. So I'll represent this is the RISE

1 mentor/mentee pairings for the school year 2024-25. Have
2 you seen this document before?

3 A. I have seen our mentor pairings over the years.

4 Q. Does this appear to be a fair and accurate
5 representation of mentor pairings for the RISE program in
6 the '24-'25 school year?

7 A. Sure.

8 MS. BURRELL: I'd ask that D-46 be admitted into
9 evidence.

10 THE COURT: All right. Any objection?

11 MR. HOOKS: No objection.

12 THE COURT: All right. D-46 is admitted.

13 (Defendants' Exhibit 46 entered.)

14 BY MS. BURRELL:

15 Q. Now, if we go to -- back to D-45 and we go to page 3
16 of D-45 --

17 THE COURT: I think your phone's going off, somebody.

18 BY MS. BURRELL:

19 Q. And I actually think -- oh, sorry. Page 4 of D-45.
20 Okay. So here it lists some of the expectations if you are
21 a mentor, and if you look at principal role and
22 responsibilities, you'd agree that it says that -- let's
23 see. One moment. You are -- sorry. Let me just find my
24 place.

25 But as a mentor, you are expected to meet with your

1 mentee on a monthly basis; is that correct?

2 A. I don't see where it says that, but they're, in
3 actuality, meeting on a daily basis.

4 Q. Oh.

5 A. When they were teachers and in the same building,
6 next door to each other.

7 Q. And I'm actually on page 6. That's my fault. It
8 should be on page 6, but it goes through some of the mentor
9 responsibilities, and it states one of those
10 responsibilities is meeting with your mentee at least on a
11 monthly basis; right?

12 A. Okay.

13 Q. Another one is to provide instructional support for
14 your mentee?

15 A. I don't see where you are, but that's correct. Oh, I
16 see. Provide instructional support. Okay.

17 Q. And so you just mentioned that sometimes mentors and
18 mentees meet daily; right?

19 A. They interact daily. It may not be a formal meeting,
20 but yes.

21 Q. And the purpose of this program is to focus on
22 retention, right, in part?

23 A. Correct.

24 Q. And so when a teacher starts in the district, the
25 hope is that they will stay there; right?

1 A. And build capacity as well, yes.

2 Q. Okay. Now, as a mentor, you want to be available to
3 support your mentee, particularly during their first years
4 of training; is that fair to say?

5 A. It is. That's actually why we went to asking retired
6 teachers to be mentors, because our current teachers that
7 were being mentors had their own demands of their daily
8 work.

9 Q. And you'd agree that the more mentees you have, the
10 less time that you're going to have to be able to meet with
11 each individual mentee; right?

12 A. I can't make that assumption.

13 Q. Well, you'd agree that if you have -- would you agree
14 if you have one mentee versus three mentees, the demands
15 might be a bit different?

16 A. On the mentor?

17 Q. On the mentor.

18 A. Well, in our -- as a teacher that's currently
19 teaching, I could see it being more demanding. As a retired
20 teacher, it's how much you're willing to spend and invest in
21 however many you're assigned.

22 Q. And this is the first year of using retired teachers?

23 A. Correct.

24 Q. As RISE mentors; right?

25 A. Correct.

1 Q. And if we go to D-46 now where we can look at
2 mentor/mentee pairings, I just want to look at that very
3 first page. We can see that there is one mentor, last name
4 Davis, who is the mentor for three different teachers at
5 Richland Elementary; right?

6 A. Yes, Jelisa Davis.

7 Q. And Ms. Davis, her race is listed here as Black;
8 right?

9 A. Correct.

10 Q. And she is the mentor for three teachers or three, I
11 should just say, faculty, all of whom are Black; right?

12 A. Correct.

13 Q. Now, if we go to, I believe -- I want to make sure I
14 give you the right page -- the sixth page of this document,
15 so document ending in 96, DOJ 00096, we can see here that
16 there is a mentor with the last name -- first and last name
17 Cedrick Wilder; right?

18 And you'll see him at the very bottom in the middle
19 column, and then you're going to see him listed a few times
20 all the way to the right?

21 A. Okay.

22 Q. Mr. Wilder's race is Black; correct?

23 A. Correct.

24 Q. And Mr. Wilder was the mentor for four separate
25 individuals; right?

1 A. Correct.

2 Q. All the individuals that he mentored were Black
3 individuals; right?

4 A. Correct.

5 Q. Now, one moment. If we look at -- going back to the
6 first page of D-46 and look at the teachers who were paired
7 with Ms. Jelisa Davis, we can see that one teacher was a
8 second grader; right?

9 A. Second grade teacher.

10 Q. Another teacher was a first grade teacher; right?

11 A. Correct.

12 Q. And the third teacher was a counselor; right?

13 A. Correct.

14 Q. And Ms. Davis is not a first grade teacher, is she?

15 A. She's an instructional specialist in that building,
16 so she interacts with all the staff at that building and
17 supports instruction.

18 Q. She does not have the same position as any of the
19 three mentees she was paired with; right?

20 A. Well, she's actually an expert teacher. That's why
21 she's in the position that she's in. So I can't say she's
22 taught first grade or second grade specifically. I know
23 tell you she taught fifth grade because she taught fifth
24 grade for me when I was her principal at Highland Bluff
25 Elementary. She's an exemplary educator. I don't know that

1 she has a counseling certification or not, but she is a
2 revered educator and well-respected educator of ours.

3 Q. And teaching first grade is different from teaching
4 fifth grade; right?

5 A. It is.

6 Q. Now, we talked a bit about the RISE mentorship
7 program, but we see here on D-63 it talks a bit about the
8 district's efforts in pairing new Black teachers with Black
9 teachers in the district; right?

10 A. Wait. Did you say D-63?

11 Q. Yes. Now I'm back to D-63.

12 A. I don't have that one.

13 Q. And I'll try to direct you to the page?

14 A. I don't have it.

15 Q. Oh, you don't have D-63?

16 A. I do not.

17 Q. Oh, that was the one -- I see. Okay. I --

18 MS. BURRELL: Yeah. Would you put it up on the
19 screen, and I'll tell you the page number that we should
20 look at.

21 BY MS. BURRELL:

22 Q. This is the document that you typed up, though;
23 right?

24 A. I did.

25 Q. And you said that you typed it up while talking with

1 other administrators in the district?

2 A. Correct.

3 Q. And who else was part of these conversations as you
4 were typing up this document?

5 A. Our assistant superintendents, our various
6 departments. You know, we mention PR in here, we mention
7 student support services and counseling around gifted. It
8 just depends on what the topic was and who was part of the
9 specific good faith efforts. I'm looking back through the
10 years at all the things that we've done and just trying to
11 paint a broad stroke of the efforts that we've made in good
12 faith.

13 Q. When did you begin typing this document?

14 A. I can't say.

15 Q. This year?

16 A. Yes.

17 Q. And did you type this document in preparation for
18 this hearing?

19 A. I typed it just as a reflection for myself initially,
20 and then -- and then it expanded to in preparation for this
21 and engaging and involving others of all the things that
22 we've done.

23 Q. And did you share this document with other
24 administrators in the school?

25 A. In which school?

1 Q. Within the school district, I should say.

2 A. Within the district?

3 Q. Yes.

4 A. It was a shared document, yes.

5 Q. Did you ask for comments from anybody prior
6 to completing it?

7 A. We talked -- we talked face-to-face.

8 Q. Okay. So, sorry, let's go back to D-63 and I'll
9 direct you to the correct page number in just one moment.
10 Okay. So we should look at page 4 where it says examples of
11 good faith efforts, and it says pairing Black mentors with
12 new Black teachers.

13 So the pairing of Black mentors with new Black
14 teachers, is that separate from the RISE program?

15 A. Well, that is our mentorship program is the RISE
16 program.

17 Q. And so does the RISE program then -- does it require
18 that Black mentors -- Black mentees are paired with Black
19 mentors?

20 A. To the extent practical. Like I mentioned a moment
21 ago with our retirees, I just recently reached out to
22 Ms. Anitra Hollis, our HR director, and Dr. Melissa McCray,
23 our elementary curriculum director, and said as a reminder,
24 since we shifted models of having teacher mentors to having
25 retired teacher mentors, I sent them a reminder around this

1 good faith effort you're asking me about to say remember
2 that we want to make sure that our new Black teachers have a
3 mentor whenever possible that looks like them. So as a
4 result of that reminder, Dr. McCray actually shifted some
5 assignments around of our mentors for this current school
6 year.

7 Q. Okay. And so I want to go back to the first page of
8 D-63 where it says school district gives -- I'm looking
9 right below curriculum development. School district gives
10 an intentional assignment of a Black mentor for a new Black
11 teacher even if not in the same grade, subject area as an
12 extra supportive measure. That's correct?

13 A. Your example of Ms. Davis is an example of that.
14 She's an instructional specialist, and you said she was
15 mentoring a first grade teacher, second grade teacher, and a
16 counselor. Ms. Jelisa Davis that we just looked at over
17 here --

18 Q. Yes.

19 A. -- from Richland elementary --

20 Q. Yes.

21 A. -- even though she doesn't teach first grade, she was
22 mentoring a first grade teacher.

23 Q. Yes?

24 A. Is that what you're asking me about.

25 Q. No, no, no.

1 A. That was an example of that.

2 Q. Yeah. I'm just reading what it says in terms of
3 pairing Black mentors with Black teachers, and you'd agree
4 that it says that you'll pair them with one another even if
5 they don't teach the same grade or subject area; right?

6 A. Right. And so what that means is sometimes as you
7 get specialized in secondary, you may actually have two -- I
8 know we were looking at the elementary mentor, but it's
9 likewise for secondary teachers as well. So sometimes you
10 may have more than one mentor. You may have your, like,
11 race mentor, and then you may have a mentor that's specific
12 to the fact that you teach physics, subject area or content
13 area, somebody to go to if they're not also of the same
14 race.

15 Q. Okay. Great. And if we could jump back now to D-46
16 and take a look at the mentees paired with Jelisa Davis.
17 The three mentees paired with Jelisa Davis did not have a
18 second mentor; right?

19 A. They did not.

20 Q. Okay.

21 A. But they could have.

22 Q. But they didn't?

23 A. But she's -- she's an instructional expert at that
24 school. She's in and out of those first and second grade
25 classrooms helping support them anyway, so...

1 Q. Understood. And she was paired with three new
2 teachers; right?

3 A. Two teachers and a counselor.

4 Q. Thank you. We also -- or you also talked about on
5 direct examination different things that the district is
6 doing with respect to hiring; right?

7 A. Are we on the good faith efforts document?

8 Q. We're not talking -- we're not looking at a specific
9 document.

10 A. Okay.

11 Q. I'm just asking generally that on direct examination,
12 you talked about the different efforts, yes, that you're
13 making in terms of hiring.

14 A. I did mention some, yes.

15 Q. One way is to use a standard rubric when interviewing
16 candidates; right?

17 A. Right.

18 Q. One way to, you know, make the process fairer is to
19 use a standard rubric when interviewing candidates; right?

20 A. For the position that's being interviewed. So I may
21 not ask the same questions of a biology candidate for a
22 biology teaching position as I would an elementary candidate
23 in elementary school for an elementary position.

24 Q. Understood. And it makes sense when interviewing for
25 the same position to use the same scoring system; right?

1 A. Say that again. I'm sorry.

2 Q. It makes sense when interviewing candidates for the
3 same position to use the same scoring system; right?

4 A. We do.

5 Q. Because it allows you to essentially compare apples
6 to apples; right?

7 A. There's one exception to that that the Rankin County
8 School District has participated in. That is if we
9 interview someone at a career fair, in a career fair
10 setting, versus if we interview them -- the questions --
11 like, when you're in a room for a big interview or even at a
12 career fair, you're not going to go into the depth of an
13 interview in the same way that you would if you may have a
14 follow-up interview so there may be, like, an initial
15 screener interview, if you will, versus a full-on interview.

16 Q. Understood. So with the exception to career fairs,
17 you attempt to use the same scoring system; right?

18 A. Yes.

19 MS. BURRELL: If we could pull up what is not in
20 evidence yet Plaintiffs' 41.

21 BY MS. BURRELL:

22 Q. And, Dr. Stocks, I don't know if you have a -- yeah.
23 Do you have our binder.

24 THE COURT: Those are just district binders up there.

25 MS. BURRELL: So we'll get you a binder, and we'll

1 also put it up on the screen.

2 THE COURT: Do y'all have witness binders and a bench
3 binder or --

4 MS. BURRELL: Yes.

5 THE COURT: If you'll go ahead and pass me the bench
6 binders while you're --

7 MS. BURRELL: I apologize for that.

8 THE COURT: No, no. It's okay. You may approach.

9 MS. BURRELL: Thank you.

10 THE COURT: If you'll hold on one second with your
11 question too.

12 BY MS. BURRELL:

13 Q. Dr. Stocks, if you could turn to Plaintiffs' 41 and
14 take a look at that document. We'll also put it up on the
15 screen.

16 A. There's nothing behind 41.

17 MS. BURRELL: Oh, that might be -- apologies.

18 A. There's an (a) -- there's a 41(a) --

19 Q. Yes. Yes?

20 A. -- and (b) and (c).

21 Q. Okay. Yes. There are subdocuments, I suppose. So
22 prior to today, did you review any district hiring
23 spreadsheets?

24 A. I have.

25 Q. And you reviewed some of these in depositions; right?

1 A. I think we did look at some in my deposition.

2 Q. And do you recognize P-41(a)?

3 A. Okay. This looks like a hiring spreadsheet.

4 Q. Does this look like a fair and accurate
5 representation of district hiring spreadsheets from '21-'22?

6 A. It does.

7 MS. BURRELL: I'd ask that P-41(a) be admitted into
8 evidence.

9 MR. HOOKS: No objection, Your Honor.

10 THE COURT: P-41(a) is admitted.

11 (Plaintiffs' Exhibit P-41(a) entered.)

12 MS. BURRELL: And for the sake of time, I'll seek to
13 admit the second one now too, which is, I believe,
14 P-41(b) -- or, actually, P-41(c). Yes.

15 BY MS. BURRELL:

16 Q. And do you recognize this document Dr. Stocks?

17 A. 41(c) --

18 Q. Yes.

19 A. -- looks like another hiring spreadsheet.

20 Q. And does this look like a fair and accurate hiring
21 spreadsheet for the '21-'22 school year?

22 A. Sure.

23 MS. BURRELL: Okay. I'd ask that 41(c) also be
24 admitted.

25 MR. HOOKS: No objection, Your Honor.

1 THE COURT: P-41(c) is admitted as well.

2 (Plaintiffs' Exhibit 41(c) entered.)

3 BY MS. BURRELL:

4 Q. Okay. So turning to P-41(a).

5 A. Okay.

6 Q. And we're going to go -- you should actually look on
7 the screen. It might be a little easier, because there's
8 multiple tabs. We are going to go to Tab 220.

9 Now, can you tell us what we're looking at here,
10 Dr. Stocks?

11 A. This looks like a hiring spreadsheet for Highland
12 Bluff Elementary School. The principal was Mr. Ben Barlow
13 at the time, and he was replacing Ms. Jelisa Davis.

14 Q. And it looks like this hiring spreadsheet includes
15 the applicant's race; right?

16 A. It does.

17 Q. And it includes their overall interview score; right?

18 A. Correct.

19 Q. And we could see that the candidate with the last
20 name Standard received an interview score of 17; right?

21 A. Correct.

22 Q. And the candidate with the last name Leflore received
23 an overall interview score of 17 as well; right?

24 A. Correct.

25 Q. Standard, her race was White; right?

1 A. Correct.

2 Q. And Leflore, her race is African-American; right?

3 A. Correct.

4 Q. And it looks like Ms. Standard was interviewed twice:
5 on the 17th and 28th; right?

6 A. Correct.

7 Q. And it looks like Ms. Leflore was interviewed in
8 between those two dates, on the 21st; right?

9 A. Correct.

10 Q. And it looks like the White candidate was offered the
11 job; right?

12 A. For this position.

13 Q. And if we scroll all the way to the right just to
14 make sure we see all the information, it indicates that
15 references were not checked for Ms. Leflore; right?

16 A. For this position.

17 Q. It doesn't say if she was hired for anything else;
18 right?

19 A. I know for a fact she was.

20 Q. But this interview spreadsheet does not indicate
21 that; right?

22 A. It does not.

23 Q. Now, if we could go to P-41(c), we're going to turn
24 to the tab labeled Job 219.

25 Now, this appears to be an interview candidate

1 spreadsheet for the Learning Center; right? On the top it
2 says LC candidate spreadsheet?

3 A. I don't see that on the screen. I'm looking on the
4 document.

5 Q. Oh.

6 A. 41(c).

7 Q. You're right. It says -- for position title, it says
8 science; right?

9 A. It does.

10 Q. But on the actual text of the document, it does not
11 indicate for what school; right?

12 A. Not on the screen.

13 Q. Okay. And it does not indicate the candidate's race;
14 right?

15 A. It does not.

16 Q. And we talked earlier about data; right?

17 A. Correct.

18 THE COURT: Just to make sure we're clear here, I'm
19 looking at 41(c). Is that right?

20 MS. BURRELL: Yes.

21 THE COURT: What I should be looking at?

22 MS. BURRELL: Yes. And it's probably easier, Your
23 Honor, to look at the screen. We'll also provide these
24 in -- through -- provide a zip drive or hard drive.

25 THE COURT: But I'm just making sure we're on the

1 same --

2 MS. BURRELL: Sure.

3 THE COURT: 41(c), if I'm looking at the first page
4 of 41(c), is that what --

5 MS. BURRELL: Oh, no. We should be looking at Job ID
6 2169, so that is a tab that's part of this document that the
7 district provided in discovery.

8 THE COURT: Okay. All right. So I am looking at,
9 which is a couple of pages into 41(c) -- Job Posting ID 2169
10 is where I should be?

11 MS. BURRELL: Yes. Exactly.

12 THE COURT: All right. I'm sorry.

13 MS. BURRELL: No worries. Thank you.

14 BY MS. BURRELL:

15 Q. And so for this interview spreadsheet, it does not
16 indicate any of the applicants' races; right?

17 A. On this document, it does not.

18 Q. And we talked earlier about data; right?

19 A. Correct.

20 Q. And how data can be helpful; right?

21 A. Correct.

22 Q. In figuring out what's working and what's not
23 working; correct?

24 A. Correct.

25 Q. And here is an example of incomplete data, right, at

1 least as to on this spreadsheet; right?

2 A. Correct.

3 Q. So on direct examination, I think when you were
4 talking about the district's good faith efforts and looking
5 at Document D-63, you talked a bit about extracurricular
6 activities; right?

7 A. Okay. We're talking about extracurricular activities
8 now?

9 Q. Yes. We're -- yeah. Another way to say we're
10 shifting gears to extracurriculars.

11 A. Okay.

12 Q. Okay. So, now, the 1978 consent order, which should
13 be in evidence as D-3, has some requirements with respect to
14 extracurricular activities; right?

15 A. You said it was D-3?

16 Q. Yes. D-3.

17 THE COURT: All right. And the 1978 one's not been
18 moved in yet.

19 MS. BURRELL: Okay.

20 THE COURT: But we can do that.

21 MS. BURRELL: Thank you.

22 THE COURT: Any objection to D-3 being admitted from
23 the district?

24 MR. HOOKS: No.

25 THE COURT: All right. D-3 is admitted.

1 (Defendants' Exhibit 3 entered.)

2 BY MS. BURRELL:

3 Q. So if we go to D-3, and I believe we want to go to
4 paragraph 5 which is on page 4, in this consent order it
5 requires that the coaches of three -- of the three main
6 sports, football, basketball, and baseball, shall not be of
7 the same race; right?

8 You should look at the middle of paragraph 5.

9 A. That's correct.

10 Q. Okay. Now, we are going to go to another document,
11 which is going to be District Exhibit 36, and I don't
12 believe this is in evidence.

13 THE COURT: It's not.

14 BY MS. BURRELL:

15 Q. So, Dr. Stocks, you can take a look and see if this
16 is a document that you recognize.

17 A. Yes.

18 Q. And does this appear to be a fair and accurate
19 representation of the data related to extracurricular
20 coaches' and sponsors' information?

21 A. For the 2023-2024 school year.

22 MS. BURRELL: I'd ask that D-36 be admitted into
23 evidence.

24 MR. HOOKS: No objection.

25 THE COURT: D-36 admitted.

1 (Defendants' Exhibit 36 entered.)

2 BY MS. BURRELL:

3 Q. So there are schools in this district where there are
4 multiple Black coaches; right?

5 A. Correct.

6 Q. We can look at, I believe, Northwest High School, and
7 there appears to be five Black coaches; right?

8 A. Correct.

9 Q. And on the second page, Richland High School has 14
10 Black coaches; right?

11 A. Correct.

12 Q. If we look at Pisgah High School, Pisgah High School
13 has zero Black coaches; right?

14 A. For this year. For the 2023-2024 school year.

15 Q. And that year it had 30 White coaches; right?

16 A. Correct.

17 Q. And there's other schools where -- other high schools
18 where there are fewer than three Black coaches; right?

19 A. There are.

20 Q. Puckett High School is one of those; right?

21 A. There's two at Puckett High School.

22 Q. Yes. Not three; correct?

23 A. Correct.

24 Q. And so we know that at least Puckett High School and
25 Pisgah High School are not in compliance with this provision

1 of the 1978 consent order; right?

2 MR. HOOKS: Your Honor --

3 A. That order --

4 MR. HOOKS: That's a mischaracterization. I object
5 to that. I don't see that --

6 THE COURT REPORTER: Turn your mic on.

7 THE COURT: Okay. Restate your question for me, Ms.
8 Burrell.

9 MS. BURRELL: Sure.

10 BY MS. BURRELL:

11 Q. The 1978 consent order states that the coaches of the
12 three main sports, football, basketball, and baseball, shall
13 not be of the same race; right? And that's D-3, paragraph 5
14 of that consent order. That's correct; right? Do you agree
15 with that?

16 A. I'm sorry. I didn't know if you were waiting on Your
17 Honor.

18 Q. You agree with that question -- you agree with that
19 statement, right, that the consent order requires that the
20 coaches of the three main sports, namely football,
21 basketball, and baseball, shall not be of the same race?

22 A. Shall not be of the same race. That's what the court
23 order says, that's right.

24 Q. And Pisgah High School, all 30 of the coaches in
25 2023-2024 were White; right?

1 A. That's correct.

2 Q. So is it fair to say that that year, at least, the
3 coaches for football, basketball, and baseball were of the
4 same race?

5 A. They were.

6 Q. Now, there are some sports that can be expensive,
7 right, expensive to participate in?

8 A. Correct.

9 Q. And cheerleading is an example of a sport where the
10 expenses on average are higher compared to other sports;
11 right?

12 A. Yes.

13 Q. The district has recognized that fees can be a
14 barrier to entry; right?

15 A. We put in some supportive measures for that.

16 Q. And so the district is -- wants to implement policies
17 to address that issue; right?

18 A. And practice and procedures.

19 Q. And what's the difference between a policy and a
20 practice?

21 A. A policy is a board-approved written -- it's just a
22 more formal than a practice or a procedure.

23 Q. A policy is required?

24 A. Not to have a practice.

25 Q. Say that again.

1 A. Ask your question again. I'm sorry.

2 Q. Is the district required to follow board policies?

3 A. We do.

4 Q. And a practice, if there is a practice that the
5 district implements, does that mean it is something that the
6 district is required to do?

7 A. It is something in line with the district policy. It
8 may not be explicitly explained or detailed out in a
9 district policy.

10 Q. And can you say the same thing about procedures as
11 well, or would you say the same thing about that the
12 compared to a board policy?

13 A. There would be a policy to support the practice or
14 procedure of the district.

15 Q. But it's not like a board policy that has to be voted
16 on and approved by the school board; right?

17 A. What is not?

18 Q. A procedure?

19 A. A procedure or a practice is the daily work that
20 supports whatever policy is in place around that matter, I
21 guess.

22 Q. Okay. Understood. So we were just talking about
23 fees that might be -- fees where -- fees for
24 extracurriculars; right?

25 A. Okay.

1 Q. And I now want to look at some of the numbers or
2 racial demographics of extracurriculars in the district, so
3 I'm going to turn to D-54, which I believe is not in
4 evidence?

5 THE COURT: It's not.

6 BY MS. BURRELL:

7 Q. Dr. Stocks, have you seen this document before and
8 does it appear to be a fair and accurate representation of
9 the extracurriculars in the district broken down by race?

10 A. You said 54?

11 Q. I believe it should be 54.

12 A. 54 looks like culturally responsive training. Or am
13 I in the wrong binder?

14 THE COURT: Yeah, it should say D. This way.

15 A. D-54? Let me get caught up with you. I'm sorry.

16 BY MS. BURRELL:

17 Q. No worries.

18 THE COURT: You've got a lot of exhibits.

19 A. Okay.

20 BY MS. BURRELL:

21 Q. Okay. Does that appear to be a fair and accurate
22 representation of extracurriculars in the district broken
23 down by race?

24 A. Yes.

25 MS. BURRELL: Okay. I'd ask that D-54 be admitted

1 into evidence.

2 MR. HOOKS: No objection.

3 THE COURT: All right. D-54's admitted.

4 (Defendants' Exhibit 54 entered.)

5 BY MS. BURRELL:

6 Q. So we're not going to go through all the numbers, but
7 I just want to talk through some of what we see.

8 So if we look at page 8 of this document, so we'll
9 scroll down to the eighth page, and hopefully the screen
10 makes it a bit easier to look at it, we want to look at
11 Puckett High School, the cheer team.

12 Now, looking at the cheer team at Puckett High
13 School, is it accurate there are zero Black cheerleaders on
14 the varsity cheer team and that -- yeah, that there are zero
15 Black cheerleaders for the Puckett High School team in
16 '23-'24?

17 A. Is this the '23-'24 year we're looking at?

18 Q. It is, yes.

19 A. And I'm at Puckett High School?

20 Q. Yes. Puckett High School.

21 A. And I'm looking at varsity cheer?

22 Q. Varsity cheer.

23 A. It looks like two Black females are listed.

24 Q. Oh, yes. Okay. So two Black females at Puckett High
25 School; right?

1 A. Correct.

2 Q. And 11 White females; right?

3 A. Correct.

4 Q. Okay. If we look at Florence High School now, so I
5 think we want to scroll up a few pages, and we look at
6 varsity cheer, we see that -- I'll let you -- I'll wait for
7 you to get to the page.

8 A. Okay.

9 Q. -- that there's one Black cheerleader and 13 White
10 cheerleaders; right?

11 A. And two White males.

12 Q. Yes. Two White female cheerleaders and two White
13 male cheerleaders; right?

14 A. Wait. We're at Florence High School varsity cheer?

15 Q. Yes?

16 A. It states one Black female, two White male; and 13
17 White female.

18 Q. Okay. And if we go to the fourth page of this
19 document and look at McLaurin High School and varsity cheer
20 for McLaurin High School, if we go down one page, we see
21 that there is one Black female; right?

22 A. Right.

23 Q. And 14 White female cheerleaders; right?

24 A. And one Hispanic and one Pacific Islander? Is that
25 right.

1 Q. Say that again, Dr. Stocks.

2 A. Let me make sure I'm on the right line.

3 Q. I think you're correct. I believe that there's one
4 Black female, right, on varsity cheer; there is one Hispanic
5 male on varsity cheer; one Pacific Islander on varsity
6 cheer; and 14 White females on varsity cheer; is that
7 correct?

8 A. That's correct.

9 Q. Now, if we look at one other sport. Let's look at
10 varsity basketball, specifically at Pisgah High, which
11 should be the seventh page of this document. Or, sorry,
12 varsity baseball. Make sure I didn't misspeak.

13 So varsity baseball at Pisgah High, there were 20
14 White males and zero White -- sorry. Twenty White males and
15 zero White -- Black males; right?

16 A. Are you on varsity baseball or basketball?

17 Q. Baseball.

18 A. Okay.

19 Q. Is that correct?

20 A. Twenty -- wait. Pisgah High School varsity baseball.

21 Q. Yes.

22 A. It says 20 White females.

23 Q. And how many -- how many Black males?

24 A. It's not indicated.

25 Q. You'd agree that baseball is a male sport?

1 A. Yes.

2 Q. Does that appear to be a data error?

3 A. It appears to be an error.

4 Q. Okay. And then let's just quickly look at Puckett
5 High School, their baseball team, which should be on the
6 eighth page.

7 And it looks like at the Puckett High -- at Puckett
8 High School, there was one Black male on the varsity
9 baseball team and 25 White males; right?

10 A. Right.

11 Q. Okay. So is it fair to say that there are some
12 sports in the district where there is a substantially higher
13 percentage of White students?

14 A. Yes.

15 Q. So I want to talk a bit about the fee waiver policy.
16 And we can look at, I believe, D-51 which is already in
17 evidence.

18 So looking at the text of this policy, it says, "The
19 School Board hereby authorizes principals to charge
20 reasonable fees, but not more than the actual cost, for the
21 following" three categories, and then it lists the
22 categories; correct?

23 A. Correct.

24 Q. And the categories listed looks like it includes
25 "Supplemental instructional materials and supplies,

1 including textbooks"; number 2, "Other fees designated by
2 the superintendent as fees related to valid curriculum
3 educational objectives, including transportation"; and
4 number 3, "Extracurricular activities and other educational
5 activities"; right?

6 A. I think you said "including textbooks" for number 1,
7 but you meant excluding.

8 Q. Oh, excluding, yes.

9 A. Yes.

10 Q. Thank you. And so to summarize, essentially the
11 first part of the policy means that principals are
12 authorized to charge fees for these three related
13 categories; right?

14 A. Correct.

15 Q. Now, below that is where I want to focus on. It says
16 under the Financial Hardship Waiver Policy "All fees
17 authorized to be charged under subsection (1) and (2) of the
18 Fee Policy above shall be charged only upon the following
19 conditions," and then it lists the conditions; correct?

20 A. It does.

21 Q. And it goes on to say -- one moment. Or if we look
22 now above -- sorry. If we look right above the Financial
23 Hardship Waiver Policy, it says, "All fees to be charged
24 under this policy, except those fees authorized under (3)
25 above, shall be charged only upon the condition that a

1 financial hardship waiver may be granted upon request
2 pursuant to the following"; right?

3 A. It does say that.

4 Q. So it appears that this fee waiver policy does not
5 include extracurricular fees; right?

6 A. The way this is written.

7 Q. That's how you would understand it; right?

8 A. Correct.

9 Q. Now, was there supposed to be a change to the fee
10 waiver policy?

11 A. Yes. Because our -- our practice has changed.

12 Q. But the policy hasn't changed; right?

13 A. Is this the most -- this was last revised in 2021.

14 Q. And there are no other updated fee waiver policies
15 that the district has; right?

16 A. This is it.

17 Q. Okay.

18 A. Unless there's something with extracurricular. But
19 this encompasses that, so...

20 THE COURT: Ms. Burrell, are you about to shift gears
21 to a new topic?

22 MS. BURRELL: Yes.

23 THE COURT: Let's go ahead and take an afternoon
24 recess and give our court reporter a break. I've pushed her
25 longer than I needed to. We'll be in recess about

1 15 minutes. If everybody will be back here and ready to go
2 no later than 3:25. I'll see you all then. Court will be
3 in recess.

4 MS. COSSAR: All rise.

5 (A brief recess was taken.)

6 THE COURT: All right, Ms. Burrell. You may
7 continue.

8 BY MS. BURRELL:

9 Q. Okay, Dr. Stocks. Just a few final questions for
10 you.

11 A. Okay.

12 Q. I'm going to look at D-63, which we've talked about a
13 bit today. So D-63 on page 4 --

14 THE COURT: That's the one y'all are going to have to
15 pull up on the screen solely.

16 MS. BURRELL: Oh, yes. Okay.

17 THE COURT: Yeah. It's not in our notebooks. There
18 you go.

19 BY MS. BURRELL:

20 Q. So D-63. Was counsel for the district involved in
21 preparing this document?

22 A. They wouldn't -- I mean, no. This is what we've --
23 we've done.

24 Q. So D-63, page 4, I'm looking at staff training. And
25 so this lists some of the good faith efforts with respect to

1 staff training; right?

2 A. Correct.

3 Q. And it says creating a respectful workplace; right?

4 A. Correct.

5 Q. It does not indicate how the district is attempting
6 to do that; right?

7 A. Oh, the -- yes.

8 Q. And --

9 A. I mean no, it does not.

10 Q. And diversity awareness, it also states diversity
11 awareness; right?

12 A. Correct.

13 Q. But it doesn't indicate what sort of training there
14 is with respect to diversity awareness for staff; right?

15 A. Correct.

16 Q. It doesn't indicate if this training is mandatory;
17 right?

18 A. Right.

19 Q. It doesn't indicate when this training started;
20 right?

21 A. Correct.

22 Q. Or how often this training or trainings occur; right?

23 A. It does not.

24 Q. Okay. Good faith efforts talk a bit about the fee
25 waiver policy, and I believe also there's a fee waiver

1 tracker to look at who is applying for fee waivers; right?

2 A. Correct.

3 Q. I want to show you D-55, which is not yet in
4 evidence. Have you seen this document before?

5 A. It's just this one page?

6 Q. Yes.

7 A. Perhaps I have, but the one that's current has more
8 listed on it that I'm most familiar with.

9 Q. I'm sorry. Say it again. The one that's current is
10 what?

11 A. There's a more current version of our fee waiver
12 tracker that has more students listed on it.

13 Q. So this is the fee waiver tracker that was provided
14 to plaintiffs. Does this look like -- or does this appear
15 to be a fair and accurate representation of the fee waiver
16 tracker that the district put together at some point in
17 time?

18 A. Yes.

19 MS. BURRELL: Okay. I'd ask that D-55 be admitted
20 into evidence.

21 MR. HOOKS: No objection.

22 THE COURT: All right. D-55 is admitted.

23 (Defendants' Exhibit 55 entered.)

24 BY MS. BURRELL:

25 Q. When we look at D-55, we can see that there is one

1 student listed in the fee waiver tracker; right?

2 A. Correct.

3 Q. And the date for this fee waiver request was
4 October 2024; right?

5 A. Correct.

6 Q. So about a year ago; right?

7 A. Correct.

8 Q. And \$40 was provided to this student for fees related
9 to band; right?

10 A. Correct.

11 Q. Okay. You talked earlier about the district school
12 board on direct examination. There are five members on the
13 district school board?

14 A. There are five board members.

15 Q. All five are White; right?

16 A. They are.

17 MS. BURRELL: Okay. No further questions.

18 THE COURT: Okay. You're almost done, Doctor, not
19 yet.

20 THE WITNESS: Okay.

21 THE COURT: Any redirect?

22 Thank you, Ms. Burrell.

23 MS. BURRELL: Thank you.

24 MR. HOOKS: I do, your Honor. It's very brief.

25

REDIRECT EXAMINATION**BY MR. HOOKS:**

Q. Dr. Stocks, a moment ago you were asked on your cross-examination about efforts you had made to follow up regarding several issues with honors English, do you recall that, and AP courses. Had you completed your answer in that area?

A. Okay. Say that again.

Q. Sure.

A. Shifting gears.

Q. Yes. You were asked to -- a moment ago, rather, you had followed up on changes to the AP program after policy changes were made. You had followed up on AP and honors programs. Do you recall that?

A. Right.

Q. And you indicated that you had followed up on it; is that right?

A. I'm trying to remember.

Q. Is there anything additional with regard to your answer on that that you had to say?

A. In talking about honors and AP, just about the fact that how we support our students with fees. We pay for students taking those courses, the exam fee, if they are free or reduced lunch or if they are in our -- if they're under any type of hardship and they request that to Dr. Rico

1 Buckhaultner, who looks closely at that hardship need, and
2 then I've never known a student not to receive a hardship
3 that's requested one.

4 Q. And I want to turn your attention back to D-63.

5 MR. HOOKS: And if we could put that back on the
6 screen.

7 BY MR. HOOKS:

8 Q. It -- I believe you were asked -- if you look on the
9 document on page 4, there's an entry under dual credit. Do
10 you see that on the screen?

11 A. Not yet.

12 Q. We'll have to wait until it comes up.

13 THE COURT: All right. It's up on our screen.

14 BY MR. HOOKS:

15 Q. All right. If you'll look on page 4, there's an
16 entry under dual credit. Do you see that?

17 A. Yes.

18 Q. Does this refresh your recollection on the dual
19 credit funding that's provided by the district for dual
20 credit?

21 A. Right. Full funding is provided for all students who
22 qualify for dual credit courses that are Title I schools.
23 So that would be McLaurin High School, Pelahatchie High
24 School, and Richland High School.

25 Q. What does it say also about RCSD pays all dual credit

1 course fees? What does that say, the third bullet point?

2 A. If they're in a career and technical education course
3 that also is dual credit -- that would be taken through
4 Hinds Community College -- that that is paid. Any fees
5 associated with that career and technical education dual
6 credit course is paid through our agreement with Hinds
7 Community College and the Rankin County School District.

8 Q. Now, also you were asked some questions about Exhibit
9 Plaintiffs' 41(a) and (c), I believe. Is that right? Do
10 you recall that?

11 A. Oh, in the other binder. I do. Was it about
12 interviews?

13 Q. Yes. And there was discussion -- I believe the
14 document (a) and (c) were admitted, but not (b), and I'd
15 like for you to take a moment and look at 41 -- P-41(b), as
16 in bravo.

17 A. Okay.

18 Q. All right. Do you recognize this document?

19 A. I do.

20 MS. BURRELL: Sorry. I'm just going to object
21 because I do think that we're actually going to be replacing
22 that document. You know introduce it. It just won't be
23 labeled -- it won't be an exhibit we're using.

24 MR. HOOKS: All right. Your Honor, if there's no
25 objection, I'd like for -- I think there's an (a) and a (b)

1 and (c), and I think (a) and (c) were admitted. I would
2 just like (b) to be admitted for completeness' sake.

3 THE COURT: Okay. And, Ms. Burrell, are you
4 objecting to that coming in, or are you just saying you're
5 going to have another exhibit later?

6 MS. BURRELL: Yes. There's another that is labeled
7 41(b). I think our first set of exhibits contained -- we
8 basically swapped exhibits, so anyway, I can just make it
9 Exhibit (d).

10 THE COURT: Let's do that. All right. Then we'll
11 admit this document as P-41(b), and then we'll label --
12 relabel yours later, Ms. Burrell.

13 All right. P-41(b) is admitted.

14 (Plaintiffs' Exhibit 41(b) entered.)

15 BY MR. HOOKS:

16 Q. And in connection with questions regarding these
17 documents associated with Exhibit 41, do you recall being
18 asked about two employees who had applied for a position,
19 last names Standard and Leflore?

20 A. I do.

21 Q. Did you look into that?

22 A. I did. I actually looked into it as a result of
23 reading Dr. Erica Frankenberg's expert witness report
24 because it was alarming to me that she concluded or she
25 included in her report that there were missed opportunities

1 for the district to diversify staff and it was upwards of 20
2 to 30; I can't remember the exact number that she cited in
3 her report. And so I just was curious about how -- knowing
4 the good faith efforts that we have and that we use, like,
5 how could that be possible?

6 I went back and looked, and there are many cases
7 where an employee may have had a comparable score to the
8 highest score and they weren't hired for that particular job
9 that they applied or interviewed for but they were, in turn,
10 hired for another position within the district. Between
11 those two years that she references in her report, there
12 were ten hires that would have fit her analysis and then I
13 think 14 the next year -- or 14, and I don't remember which
14 one was the '21-'22 and which one was the '22-'23 school
15 year.

16 But it just made me conclude that maybe there was a
17 misunderstanding looking in isolated spreadsheets, like this
18 one that I'm looking at now, and not looking across
19 spreadsheets where maybe a Black teacher would have been
20 hired for another position.

21 So that was something that I took note of in her
22 report and actually spent the time to look at and determine
23 that in fact we didn't miss all those opportunities. Even
24 though we may have missed some, that we did in fact hire in
25 several cases in both of those years.

1 Q. I see. So is what you're telling the Court that one
2 would need to cross-reference the entire universe of
3 applicants because is what you're telling the Court that
4 applicants often apply for more than one position at a time
5 in the district?

6 A. And interview for more than one position not only
7 within a school potentially but also between schools.

8 Q. I see. So a candidate, therefore, might apply for a
9 job and going to through the interview process and suddenly
10 also get a job opportunity at the Rankin County School
11 District at another school at almost the same time?

12 A. Correct.

13 THE COURT: Hold on one second.

14 MS. BURRELL: Objection, Your Honor, as to leading.

15 THE COURT: Okay. I sustain the objection.

16 BY MR. HOOKS:

17 Q. Now, you were also -- if I could direct your
18 attention to D-54, you were asked some questions about
19 extracurriculars with regard to that exhibit. Do you recall
20 that?

21 THE COURT: What was that exhibit number again,
22 Mr. Hooks?

23 MR. HOOKS: D-54.

24 BY MR. HOOKS:

25 Q. Do you see that exhibit?

1 A. I do.

2 Q. All right. And is it not possible to go through this
3 exhibit and find instances where African-American students
4 are participating in various activities at a
5 disproportionate rate compared to their racial percentage in
6 schools?

7 A. Yes. And --

8 Q. And so if you go to the last page of the exhibit, for
9 example, this information pertains to Richland High School;
10 correct?

11 A. Correct.

12 Q. And if you look with me at junior high football,
13 seven through eight, what's the number of African-American
14 males there?

15 A. Twenty.

16 Q. And the number of -- it says Caucasian males?

17 A. Thirteen.

18 Q. All right. And look with me at varsity basketball.
19 How many African-American males are participating?

20 A. Nineteen.

21 Q. And how many Caucasian males?

22 A. Two.

23 Q. Is it in your experience that individuals choose
24 sports or they end up in sports and extracurricular
25 activities in the district based on their own interests?

1 A. It's student choice. And as a district we aim to try
2 to break any barriers to what they would wish to pursue.

3 MR. HOOKS: No further questions, Your Honor. Thank
4 you.

5 THE COURT: All right. May this witness be fully
6 finally excused?

7 MR. HOOKS: Yes, ma'am.

8 THE COURT: You may step down, Dr. Stocks.

9 THE WITNESS: Do I leave the binders here, Your
10 Honor?

11 THE COURT: Yes, please, if you don't mind. All
12 right. Thank you.

13 Mr. Hooks, who does the district call as its next
14 witness?

15 MR. HOOKS: Ms. Anitra Hollis.

16 MS. HOLMES: Your Honor, may I raise something
17 briefly before we begin with this witness?

18 THE COURT: Pardon?

19 MS. HOLMES: May I raise something briefly before we
20 begin with this witness? I've been made aware that there
21 are two individuals who submitted comment forms who were not
22 here this morning when the Court asked if anyone wanted to
23 provide comment and are here now, and I'm wondering if it
24 would be possible perhaps at the end of the day or at some
25 point to allow them to provide their comment to the Court.

1 THE COURT: The notice, as I understood it, said to
2 be here at 9 -- September 16th at 9:30, so I'm not going to
3 take them out of order. If they weren't here this morning,
4 we're going to forge ahead.

5 MS. HOLMES: Understood, Your Honor.

6 THE COURT: All right. The district may call its
7 next witness.

8 MR. HOOKS: Your Honor, we'll call Ms. Anitra Hollis,
9 and I'll just get her from the witness room.

10 THE COURT: Please do. Thank you. Counsel, remind
11 me before we recess for the day to take up exhibits and how
12 we need to deal with admitted exhibits. Just don't let me
13 forget before we get out of here.

14 Ms. Hollis, if you'll come straight ahead for me. If
15 you'll come through this way to the witness box. You're the
16 happiest witness we've seen today. You're just excited to
17 be here, I can tell. Dr. Stocks was on the stand forever,
18 so she was happy to get off and you're happy to be here.

19 If you'll stand for me before we get going, place
20 your left hand on that Bible, and raise your right hand,
21 we're going to get you sworn in.

22 (Whereupon, the witness was placed under oath.)

23 THE COURT: Ms. Hollis, you may be seated.

24 If you will, there's a lot of binders up there with
25 different exhibits. You don't have to mess with them yet,

1 but if you'll go ahead and pull that microphone close to
2 you. There's a court reporter that's seated in front of me,
3 and she's going to take down your testimony and everything
4 we say, so it's important to wait until the lawyers finish
5 their question before you respond so they can -- the court
6 reporter can take down both sides and there's no crosstalk.
7 And also make sure that you speak slowly and clearly so we
8 can all hear you and she can take the testimony down. Okay?

9 THE WITNESS: Okay.

10 THE COURT: You may proceed, Mr. Hooks.

11 **ANITRA HOLLIS,**

12 **having been first duly sworn, was examined**
13 **and testified as follows...**

14 **DIRECT EXAMINATION**

15 **BY MR. HOOKS:**

16 Q. Good afternoon, Ms. Hollis.

17 A. Good afternoon.

18 Q. Could you please state your full name for the record.

19 A. Anitra Hollis.

20 Q. And how do you spell your last name?

21 A. H-o-l-l-i-s.

22 Q. And how many years, Ms. Hollis, have you been in the
23 field of education?

24 A. I've been in the field of education for 26 years. Of
25 course, I consider myself a lifelong learner, because I've

1 always wanted to be a teacher even as a child, so...

2 Q. And are you currently employed?

3 A. Yes.

4 Q. Where do you work?

5 A. Rankin County School District.

6 Q. And how long have you been employed with the Rankin
7 County Schools?

8 A. Twenty-six years. My entire professional career has
9 been with Rankin County School District.

10 Q. And in your career, can you give the Court a sense of
11 the different positions you've occupied while at the Rankin
12 County Schools?

13 A. Yes. I started out as a teacher, second grade
14 teacher. I then became a fifth grade teacher once North
15 Shore Elementary was built and opened. Then I went back to
16 Northwest as an assistant principal. Then I went to
17 Richland as principal. And currently now HR director.

18 Q. And in your position as HR director, can you give us
19 a sense of what your responsibilities are?

20 A. Sure. My responsibilities include overseeing the
21 recruitment and hiring of our teachers and employees,
22 certified and classified staff.

23 Q. Now, when you say "certified and classified," can you
24 explain to the Court what that distinction is about?

25 A. Sure. So certified would entail licensed by the

1 State of Mississippi. They would hold a bachelor's degree.
2 That also would include, like, our teachers, counselors,
3 librarians, counselors, interventionists. They're the ones
4 that are solely responsible for the instruction.

5 Q. I see. And before we go any further, can you just
6 briefly give the Court an overview of your educational
7 background.

8 A. Yes. My educational background, I always wanted to
9 attend Tougaloo College, but I ended up going to University
10 of Mississippi on an academic scholarship. Back up.

11 I completed Scott County schools. I'm a product of
12 Scott County schools, and then I went to college there, got
13 my bachelors's there at the University of Mississippi. Then
14 I got my administrative degree from Mississippi College.
15 I'm also National Board Certified Teacher and also NISL
16 trained. And NISL stands for national institute of school
17 leadership.

18 Q. I see. And with regard to the types of
19 certifications for teachers, can you give us a sense, are
20 there different certification levels?

21 A. Yes. Is that for certified teachers that you're
22 referencing?

23 Q. Yes.

24 A. Yes, there are different certification areas. And
25 that's broken down by the State of Mississippi, and that

1 also entails our accreditation, making sure that we have
2 licensed teachers in certain courses that they're teaching.

3 Q. Okay. So some teachers have a -- like, an
4 endorsement for kindergarten through twelfth grade?

5 A. Yes.

6 Q. All right.

7 A. So it basically really depends on the subject area.
8 For elementary, which I'm most familiar with, it may be
9 pre-K, and then K through 4 and then the 4 through 8 for
10 elementary. And then we have some that are K through 12,
11 which might be, like, your special education and those types
12 of things.

13 Now, if a person gets, like, an alternate route
14 license, they're mainly 7 through 12, whereas a lot of our
15 IHLs are recognized and -- like, we have some teachers that
16 we have got an emergency license for that are now 4 through
17 8, so some of our IHLs are now offering that.

18 Q. I see. So if the Court hears testimony today about
19 alternative route teachers, what does that mean?

20 A. So those are not your traditional licensed teachers.
21 Maybe they did not go to college to -- in the field of
22 education. For example, we may have someone that majored in
23 biology. Well, they may not have formal educational
24 training, so they may have our alternate route program. So
25 we do offer alternative license. Also known as -- back in

1 the day, it was called emergency license.

2 Q. If you'll look with me, there are a number of binders
3 in front of you. I think you want the ones to your right,
4 actually, for this question I'm about to ask you?

5 A. Okay.

6 Q. And if you'll look, you'll see under the first tab
7 there should be D-1?

8 A. Yes.

9 Q. Do you recognize this document?

10 A. I think it's -- D-1 yes.

11 Q. Okay. So with regard to this document, do you
12 recognize it?

13 A. Yes, I do recognize the document.

14 Q. All right. And what is it?

15 A. It looks like the 1970 court order.

16 MR. HOOKS: Okay. And, Your Honor, if there's no
17 objection, I'd like to ask this be D-1.

18 THE COURT: Any objection?

19 MS. FELDKAMP: No, Your Honor.

20 THE COURT: All right. D-1 is admitted.

21 (Defendants' Exhibit 1 entered.)

22 BY MR. HOOKS:

23 Q. So if you look on page 13 of the order, do you see in
24 paragraph 1 the first part of this talks about desegregation
25 of faculty and staff? Do you see that?

1 A. Yes.

2 Q. And does it talk about what happens in 1969 and 1970
3 under the order?

4 A. Yes.

5 Q. What does it talk about? What does it say?

6 A. For the remainder of the 1969-1970 school year, the
7 district shall assign the staff described above so that the
8 ratio of the Negro to White teachers in each school, and the
9 ratio of other staff in each, are substantially the same as
10 each such ratio to the teachers and other staff,
11 respectfully *[sic]*, in the entire school system.

12 Q. All right. And if you look with me, there's another
13 paragraph below that one. What does it say?

14 A. "The school district shall, to the extent necessary
15 to carry out this desegregation plan, direct members of its
16 staff as a condition of continued employment to accept new
17 assignments."

18 Q. And then what does number 2 say?

19 A. "Staff members who work directly with children, and
20 professional staff who work on the administrative level will
21 be hired, assigned, promoted, paid, demoted, dismissed, and
22 otherwise treated without regard to race, color, or national
23 origin."

24 Q. So in looking at the 1970 order and the subsequent
25 orders in this case, is it fair to say that the Court does

1 not impose any type of strict racial deviation with regard
2 to faculty assignment throughout the district?

3 MS. FELDKAMP: Objection, Your Honor. This question
4 improperly asks --

5 MR. HOOKS: I don't --

6 MS. FELDKAMP: -- the witness to reach a legal
7 conclusion.

8 MR. HOOKS: I'll withdraw the question.

9 THE COURT: Okay.

10 BY MR. HOOKS:

11 Q. With regard to the court orders, are any deviations
12 required at any school by the orders?

13 A. The -- well, not for the 1970 order.

14 Q. I see. All right. But in terms of looking at any
15 specific requirements at any particular school, is there
16 anything required beyond what you just read?

17 A. Not in this court order.

18 Q. Fair enough. So if we look at Exhibit D-3, I want to
19 point out to you something found in D-3. Do you recognize
20 D-3?

21 A. Yes.

22 Q. All right. If you'll look with me, is this the 1978
23 consent order?

24 A. It may be the '73.

25 Q. I'm sorry. I might have misspoke.

1 A. It's showing file stamp, so it may be the 1978.

2 Q. It's file-stamped August 21, 1978?

3 A. Uh-huh. Uh-huh.

4 Q. All right. I want to call your attention to
5 paragraph 4 on page 4. Do you see this?

6 A. Yes.

7 Q. All right. If you look with me on paragraph 4, does
8 it say "All schools shall be operated without racial
9 discrimination and in the manner which ensures proportionate
10 Black participation in all student and faculty activities"?

11 A. Yes.

12 Q. And if you'll glance down with me toward the end of
13 that paragraph beginning with "There shall," what does it
14 say?

15 A. "There shall be proportionate Black representation on
16 the faculty committee for the selection of textbooks, making
17 of policy, and all other academic areas."

18 Q. And then is there more information contained on
19 paragraph 5. Do you see that?

20 A. Yes.

21 Q. What does it say with regard to the affirmative steps
22 described there?

23 A. "Defendants shall take affirmative steps to assure
24 proportionate Black representation in all professional,
25 administrative, and nonprofessional employment areas".

1 Would you like for me to continue?

2 Q. Yes, please.

3 A. Okay. "Preferably in no school attendance zone shall
4 the overall principal and high school principal be of the
5 same race, and in no event shall all principals be of the
6 same race. Coaches of the three major sports, namely
7 football, basketball, and baseball, shall not be of the same
8 race. Where there is more than one counselor, they shall
9 not be of the same race. Black teachers should be hired to
10 teach every grade level in each school attendance zone, and
11 there should be proportionate black representation in
12 management positions, in food services, transportation
13 services, and other academic activities. Black teachers and
14 administrators shall be chosen to participate in all
15 academic workshops and other academic programs."

16 Q. All right. Now I would like to direct your
17 attention, Ms. Hollis, to Exhibit D-31 and ask if you
18 recognize this document.

19 A. Yes. That's our district policy outlining our equal
20 employment opportunity.

21 Q. And can you describe what the significance of this
22 policy is here?

23 A. It's our district's written plan to not discriminate
24 against applicants who apply for positions.

25 Q. And does it say, "The Rankin County School District

1 grants equal employment opportunities to all qualified
2 persons regardless of race, creed, color, gender, age,
3 national origin, marital status, or disability"?

4 A. Yes.

5 Q. And what does the other sentence there say?

6 A. "It is the intent and desire of the Rankin County
7 Board of Education that equal opportunities be provided in
8 recruitment, selection, salaries, promotions, benefits,
9 privileges, and all other terms and conditions of
10 employment.

11 "The District follows current federal and state law."

12 MR. HOOKS: All right. If you could bear with me
13 just a moment, Your Honor.

14 BY MR. HOOKS:

15 Q. D-3, one more question.

16 THE COURT: Before you get to D-3, do you want D-31
17 in or no?

18 MR. HOOKS: I do, Your Honor. I'm sorry.

19 THE COURT: Okay.

20 MR. HOOKS: I do -- I would like that admitted as
21 Exhibit D-31.

22 THE COURT: Any objection?

23 MS. FELDKAMP: No objection, Your Honor.

24 THE COURT: All right. D-31 is admitted.

25 (Defendants' Exhibit 31 entered.)

1 BY MR. HOOKS:

2 Q. All right. If I could direct you to page 5 of D-3,
3 now, the Court in this paragraph -- to be fair, if you go
4 back on page 7, the Court is discussing changes enumerated
5 above, and then the Court goes into a discussion, does it
6 not, on the first sentence on page 5 beginning "changes with
7 regard to hiring of principals and coaches." Do you see
8 that?

9 A. Yes.

10 Q. And then there's a sentence toward the end of that
11 paragraph that begins "The removal of incumbents." Do you
12 see that?

13 A. Uh-huh.

14 Q. Could you --

15 THE COURT: Is that a "yes"?

16 THE WITNESS: Yes.

17 THE COURT: You've just got to give a verbal
18 response.

19 THE WITNESS: I'm sorry.

20 THE COURT: That's okay.

21 THE WITNESS: Yes.

22 BY MR. HOOKS:

23 Q. "The staff hiring scheme required hereunder," do you
24 see that? "The staff hiring scheme required hereunder"?

25 A. Yes.

1 Q. Could you tell the Court what that says?

2 A. The staff requirement -- excuse me.

3 "The staff hiring scheme required hereunder does not
4 contemplate the removal of incumbents in administrative or
5 staff or other staff positions, but it is understood that
6 the district will, through attrition, achieve a ratio of at
7 least 28 percent Black staff at every level and in all
8 categories."

9 Q. All right. Now, if I could get you to turn to D-30
10 now, which is the teacher assignment chart, and ask if you
11 recognize this exhibit?

12 A. Yes.

13 Q. All right. What is this?

14 A. This is the percentage and raw data of our teacher --
15 it says "teacher assignments," but although we don't assign,
16 but it's the demographic makeup of each school.

17 Q. All right. So if you'll look with me on page 20 --
18 I'm sorry. The pages aren't numbered, but if you'll go to
19 the last year for which there's data in the exhibit, do you
20 see this is for school year 2020 through 2021?

21 A. Yes.

22 Q. And this is the teacher assignment data, you said.
23 It reflects the distribution of teachers across the district
24 by race, essentially; is that what you're telling us?

25 A. Yes.

1 Q. So, for example, in this chart for 2020-2021, there
2 are 156 Black teachers; is that right?

3 A. That's correct.

4 Q. And 1,229 White teachers?

5 A. Yes.

6 Q. And you'll see the racial percentages are given
7 there; right?

8 A. Yes.

9 Q. And I believe from your reading a moment ago of this,
10 the court order, you said, does not require a particular
11 deviation here, does it?

12 A. No. Not in the previous court order.

13 Q. Nevertheless, here is a deviation of plus or minus 20
14 percentage points that's on the chart; correct?

15 A. That's correct.

16 Q. And can you give the Court an overview, in terms of
17 Black percentage of your teaching faculty for this
18 particular school year, which schools come within that
19 20 percent deviation of Black teachers, which is -- I
20 believe it says zero to 31.17?

21 A. Yes.

22 Q. So which schools come within that deviation? Take a
23 moment and look at them.

24 THE COURT: Are you going to move this into evidence?
25 Mr. Hooks, do you want to move D-30 into evidence before she

1 testifies further on it?

2 MR. HOOKS: Yes, please. I would like for D-30 to be
3 in evidence.

4 THE COURT: Okay. Any objection to D-30?

5 MS. FELDKAMP: Your Honor, plaintiffs object to the
6 portion of this exhibit that contains excluded data for the
7 '24-'25 school year, but otherwise, no objection.

8 THE COURT: Okay. I'll overrule the objection. D-30
9 is admitted.

10 (Defendants' Exhibit 30 entered.)

11 BY MR. HOOKS:

12 Q. All right. If you'll look with me, you're
13 referencing the 2020-2021 data. Do you see that?

14 A. Yes.

15 Q. All right. And could you explain for the Court which
16 of the particular schools fall out of that 20 percent
17 deviation?

18 A. Based on the data, Learning Center was out of range
19 there with eight out of their 20 staff members -- eight of
20 those were Black, so that -- they were at 40 percent.

21 Q. All right. And in terms of Black percentages, what
22 about McLaurin Elementary?

23 A. Yes. Same thing there. McLaurin Elementary, out of
24 their 42 total teachers, 14 of their -- 14 of their teachers
25 were Black, which made 33 percent.

1 Q. But the deviation was between zero and 31.17?

2 A. Correct.

3 Q. And it was out at --

4 A. Yes.

5 Q. -- 33 percent?

6 A. Yes.

7 Q. Is that right?

8 A. That's right.

9 Q. Now, looking at the White teacher category, what do
10 you find there?

11 A. Out of that range for the White, it was -- McLaurin
12 Elementary, 26 of their 42 were White, which made theirs be
13 61 percent, and to be in alignment, it was the 67 percent at
14 least.

15 Q. All right. And I won't go over all of these years,
16 but I'd like for you to look at the next year to give the
17 Court a sense of what you're finding here. On '21-'22, can
18 you look at that year for me?

19 A. Yes.

20 Q. What does it show?

21 A. It shows that all of the schools are within range for
22 Black and White with the exception of McLaurin Elementary.
23 Out of their 34 total teachers, 12 of those teachers were
24 Black, and it made it -- it was at 35 percent, and I think
25 31 percent was the maximum number, according to that plus or

1 minus 20.

2 And the same thing for Learning Center. Out of the
3 Learning Center's 22 teachers, they had seven Black, which
4 brought them to 31.82 percent, so it was barely out of range
5 there but -- because the range was 31.56.

6 Q. All right. And what did it show for White teacher
7 percentages?

8 A. Okay. At McLaurin Elementary, out of their 34 total
9 teachers, they had 20 that were White, which made that be
10 58 percent, and the range there started at 67 percent.

11 Q. All right. Now, if you'll glance ahead and look at
12 the most recent aspect here, current school year '25-'26,
13 can you tell the Court what the data show in terms of your
14 Black faculty coming in between zero and 35.6 percent,
15 various schools?

16 A. Within that, out of all of our 28 campuses, it shows
17 that we have one school that we are still working towards,
18 and that is our Learning Center.

19 Q. All right. With regard to your White faculty, what
20 does it show?

21 A. The same thing. Theirs is at 40.9 percent; and for
22 the White staff, it should be at at least 63 percent.

23 Q. But all other schools come within the range?

24 A. Yes.

25 Q. Now, Ms. Hollis, if you could explain to the Court

1 what the phrase "critical teacher shortage" means to you.

2 A. Well, the phrase means that there's a shortage. I
3 know that there is a national teacher shortage all across
4 the United States, but critical means certain subject areas
5 as far as critical needs that the State identifies. The
6 State has some geographical school districts that they also
7 incentivize and offer funds, additional funds.
8 Unfortunately, Rankin County is not one of those areas, even
9 in the critical subject areas such as math and those. So
10 any teacher that teaches in those areas.

11 MS. FELDKAMP: Objection, Your Honor. This witness
12 has not laid a foundation for an opinion on the national
13 teacher shortage or any personal knowledge.

14 THE COURT: Okay. I'll overrule the objection for
15 now. If we go any further, I may require more of a
16 foundation.

17 BY MR. HOOKS:

18 Q. Ms. Hollis, could you give the Court a sense of what
19 efforts the human resources department in the school
20 district generally undertakes with regard to recruiting of
21 teachers?

22 A. Yes. Well, one of the things that we -- one of the
23 efforts -- or some of the efforts include going to our
24 various career fairs. We definitely go to, you know, the
25 ones that are local, in state. Right now not any out of

1 state. But attending our HBCUs, even if I'm not personally
2 able to attend, one of our recruitment team members are able
3 to go. Also for recruitment and retention, another effort
4 is definitely having MOUs with those -- with all of our
5 universities.

6 Clearly, since we are in a national teacher shortage,
7 we count it a joy anytime we have a future teacher that
8 wants to come and observe even before they get into student
9 teaching, so we open our classroom doors for them to be able
10 to come get observation hours.

11 Also, we do not charge those individuals a background
12 check fee. We waive that fee for them. So our human
13 resources department funds that for them with the intent of
14 knowing that it's, again, to remove a barrier to allow them
15 with the intent of hoping that they will want to remain in
16 our district to do student teaching.

17 Q. And for positions of employment with the district, do
18 you all post those anywhere?

19 A. Yes. Those are posted -- any positions that we have
20 are posted on our district portal, also known as Frontline,
21 but recently the State Department of Education, with MDE,
22 they started a portal, a statewide portal, so we also
23 participate in that. Our human resources person -- we don't
24 have extra personnel to do that, so we're just pulling, you
25 know, double duty getting those posted.

1 We also post to our -- we're in the works of posting
2 with our Mississippi Department of Employment Services,
3 posting to there as well.

4 Q. And do you all post on any social media, and do you
5 make radio --

6 A. Yes. Yes. We do the social media post, and we also
7 do the radio, especially when we're having career -- our own
8 district career fair. We make sure that also we do the
9 geofencing, so therefore if it's within a certain mile
10 radius of our certain colleges or what have you, we make
11 sure that that way it's appealing to whoever is in that
12 area.

13 Q. All right. If you'll look with me, Ms. Hollis, at
14 Exhibit 39, do you recognize this exhibit?

15 A. I haven't gotten to it yet.

16 Q. It might be in your other book there.

17 A. Yes.

18 Q. All right. What is this?

19 A. That is a picture of one of our assistant principals
20 that -- at our district career fair where it looks like that
21 the young lady, who is now an employee of ours, it looks
22 like she's signing in and learning more about the Brandon
23 school zone there at Rouse Elementary there. But she's one
24 that I was able to recruit, and she is completing, I think,
25 her second or third year with us now.

1 Q. So you said at a career fair at the district. So you
2 all have career fairs at the school district as well?

3 A. Yes. And we also have these on Saturday with the
4 hopes that, you know, more of our future educators are able
5 to come down and travel down, so that way we try to make it
6 more convenient and conducive to them.

7 Q. All right. What is this post on the second page of
8 this exhibit?

9 A. That's one of our -- every board meeting where
10 different employees are recognized for their efforts, also
11 known as our certified and classified employees of the
12 month.

13 MR. HOOKS: All right. Your Honor, before we go any
14 further, I'd like for this to be D-39.

15 THE COURT: Any objection to admitting D-39?

16 MS. FELDKAMP: No objection, Your Honor.

17 THE COURT: All right. D-39 is admitted.

18 (Defendants' Exhibit 39 entered.)

19 BY MR. HOOKS:

20 Q. All right. If you'll look through the -- and I won't
21 go through every page, but if you could tell me what these
22 next couple of pages are. It seems to be a young man
23 sitting -- is that in front of you and Dr. Stocks?

24 A. Yes. Actually, we were at a recruitment fair, a
25 career fair, at one of the schools -- at one of the

1 universities, and so he was one of the ones -- if I'm not
2 mistaken, I think he was a music major, maybe, but he was
3 one that we had spoken with. As a matter of fact, this
4 happened on a Friday, and I remember us having our career
5 fair that Saturday, so we were also talking to him about
6 hoping he could come down to the career fair and meet our
7 principals, because all of our principals -- we have
8 representatives from each school on that Saturday career
9 fair.

10 Q. I see. And just for the record, the young man's race
11 is what?

12 A. He's Black. African-American.

13 Q. And just for the record, what is your race,
14 Ms. Hollis?

15 A. Black.

16 Q. And do I see also here, is that superinten- -- former
17 superintendent who was attending as well, or is that a
18 principal?

19 A. Sitting at the table?

20 Q. Yes.

21 A. That's Dr. Stocks and myself.

22 Q. Oh, okay. But beside y'all in the background there?
23 Is that --

24 A. No.

25 Q. Okay. These are other principals or other --

1 A. From other -- yes. Other universities.

2 Q. Oh, I see?

3 A. I'm sorry. Not universities. Other districts.

4 Q. Oh, I understand. Okay. And if you'll look through
5 these -- the rest of these publications here, can you
6 describe what these are, what these social media posts
7 indicate?

8 A. This is -- the next picture looks like it was
9 Counselor Appreciation Week. Our public relations manager,
10 she recognizes during the designated week our counselors,
11 and so this was an excerpt from that.

12 Q. And then the next page?

13 A. This was one of our gifted teachers who worked at
14 Northwest Rankin Middle School. She was recognized at the
15 state capitol, and so this is where she was recognized on
16 our district social media page.

17 Q. And for the record, is her race African-American?

18 A. Yes.

19 Q. So is it fair to say, then -- I won't ask you to go
20 through every one of these, but do these posts indicate
21 something that the district is doing relative to minority
22 recruiting or recruiting of Black teachers?

23 A. Yes.

24 Q. What does it have to do with the efforts?

25 A. Well, it's just celebrating, so therefore, future

1 applicants or people that are interested can see people that
2 look like them and be able to see that they too are welcome.
3 Or if they know that person, they can reach out to that
4 person directly.

5 Q. And do these posts also help in other areas like
6 retention of employees?

7 A. Yes. It makes those employees see that they have a
8 sense of value, that their hard work and efforts do not go
9 unnoticed.

10 Q. I see. All right. If you'll turn with me to D-40, I
11 want to ask you if you recognize this document.

12 A. Yes. That's --

13 Q. And what is this document, Ms. Hollis?

14 A. Our memorandum of understanding, also known as our
15 MOU. That's the one that we have with Jackson State
16 University.

17 Q. All right.

18 A. And it's just an agreement.

19 MR. HOOKS: Your Honor, I'd like D-40 to be admitted.

20 THE COURT: Any objection?

21 MS. FELDKAMP: No, Your Honor.

22 THE COURT: All right. D-40 is admitted.

23 (Defendants' Exhibit 40 admitted.)

24 BY MR. HOOKS:

25 Q. And you say MOU. So is this -- it says memorandum of

1 understanding for teacher field placement?

2 A. Yes.

3 Q. Okay. Well, what does that mean?

4 A. So with Jackson State and other universities, they
5 may have it to where their future teachers are doing student
6 teaching, or it may be that they just need observation
7 hours. And so in this case, the -- this one looks like that
8 it was probably a field experience, because it was for a
9 12-week field assignment of their student teachers, so they
10 were just doing -- well, they call it field placement, but
11 it's student teaching.

12 Q. I see. And is there a goal here in getting these
13 student teachers into the district?

14 A. Most definitely. That was one of the efforts what I
15 had mentioned earlier about not charging, because there is a
16 background check fee, so the district absorbs that cost, so
17 we remove that barrier for, you know, college students to
18 have to do that background check fee. But in accordance
19 with our policy, we have to do the background check, so we
20 want them to, you know, have a way that they can get their
21 foot in the door, be able to see what goes on day to day
22 with the hopes of them being able to apply and then be in
23 one of our classrooms in the future.

24 Q. Are I see here it's Jackson State University, so for
25 the record, that's a historically Black college?

1 A. Yes.

2 Q. So are most of the students who come to the district
3 from JSU for this program African-American?

4 A. Not in all cases.

5 Q. Okay. Not in all cases, but most of them are?

6 A. Uh-huh. Uh-huh.

7 Q. And the S --

8 THE COURT: Hold on. Say "yes."

9 THE WITNESS: Yes. I'm sorry.

10 THE COURT: That's okay. I just want to make sure
11 the record's clear.

12 BY MR. HOOKS:

13 Q. And has the relationship with Jackson State
14 continued?

15 A. Yes. As a matter of fact, I'm scheduled to go the
16 end of this month to go speak to a group of students myself
17 along with other district representatives.

18 Q. And are there other efforts or interactions that you
19 all have from time to time with JSU?

20 A. Yes. We send out emails for the career fair that I
21 was mentioning. Since we do not have those students' email
22 addresses, because for privacy reasons they can't release it
23 to us, so we always send out that correspondence and any
24 type of correspondence to those JSU leaders. Mr. Mozee is
25 another one that I'm in constant communication with.

1 Q. I see. And if you'll look with me on the next
2 exhibit, which is D-41, do you recognize this document?

3 A. Yes. This is our district's human capital plan,
4 strategic plan.

5 Q. And is this something that you're familiar with as a
6 district document?

7 A. Yes.

8 MR. HOOKS: I'd like for this to be marked as --
9 entered as Exhibit D-41.

10 THE COURT: Any objection?

11 MS. FELDKAMP: No, Your Honor.

12 THE COURT: D-41 is admitted.

13 (Defendants' Exhibit 41 entered.)

14 BY MR. HOOKS:

15 Q. And I'm sorry. I interrupted you, Ms. Hollis. What
16 were you explaining that this is?

17 A. Well, I was just -- it's in partnership with MDE, our
18 Department of Education. It's a strategic plan for
19 recruitment and retention, so it's just a formal response
20 that we have documented our efforts for retention and
21 retainment.

22 Q. And if you'll look on page one, in that paragraph
23 toward the bottom, there's a sentence -- I think it's the
24 second sentence, begins "Additionally." What does that say,
25 and what do the next couple of sentences say?

1 A. Is that additionally -- in addition?

2 Q. No. "Additionally, we actively pursue stronger."

3 It's the last paragraph on the first --

4 A. Oh, last paragraph. I'm sorry. Additionally, we
5 actively pursue stronger connections and relationship with
6 our IHLs specifically showing focused attention with our
7 HBCUs. We offer to bring juniors and seniors to tour our
8 schools and hear from teachers and administrators who are
9 alumni of their college and university. We send information
10 to IHLs to forward information about our annual recruitment
11 fairs to their students. Our employees offer to be guest
12 speakers for college classes. Hosting student teachers and
13 college students for observation hours. We reached out to
14 them individually for a meeting and encourage them to apply
15 and connect as much as possible during their time in our
16 schools.

17 Q. All right. And if you'll look with me on the next
18 page, also the last paragraph, there's some reference to the
19 Rankin County School District, RCSD, diversity committee --

20 A. Yes.

21 Q. -- and what members are doing. What that's about?

22 A. Are you wanting me to read this or just explain to
23 you what --

24 Q. You know explain what -- what's happening.

25 A. Okay. So in our -- with our diversity recruitment

1 team, we have a representative from each school that serves
2 on that committee, and they also offer ideas, give
3 suggestions, feedback. We also look at the district
4 percentages. We review that. That's one of the things that
5 we've done in that team there, so that way if they knew word
6 of mouth or anybody that was interested in positions, they
7 would know kind of where our focus areas were.

8 They also sign up to participate in career fairs. We
9 have two members that are going -- one going to Alcorn and
10 one going to Valley this month.

11 Q. All right. And if you'll look with me at the very
12 next exhibit, which is D-42, do you recognize this exhibit?

13 A. Yes.

14 Q. What is it?

15 A. This exhibit is the document that we use to sign up
16 and -- for our career fair, and it also lists the amount --
17 the cost that each of those career fairs costs.

18 MR. HOOKS: Your Honor, I'd ask that Exhibit D-42 be
19 admitted.

20 MS. FELDKAMP: No objection, Your Honor.

21 THE COURT: D-42 is admitted.

22 (Defendants' Exhibit 42 entered.)

23 BY MR. HOOKS:

24 Q. All right. So we're looking here at the fall of 2024
25 at the top, and then it says spring 2025; is that right?

1 A. That's correct, yes.

2 Q. And it also -- previous -- I'm sorry.

3 The last page of this talks about what's happening in
4 fall of 2022 and spring of 2023. So tell us exactly what
5 we're seeing here in terms of the visits that you're making
6 to these various schools.

7 A. Okay. Depending on the date that it's scheduled,
8 like I said, a member or members from our recruitment team
9 will sign up to go. While there, it depends on how the IHL
10 is set up. Some IHLs allow you to do on-the-spot
11 interviews, so if that is an option, that is something that
12 we do conduct, but that's depending on the university. The
13 district itself does not have control over that.

14 For those that do offer that option, because we want
15 principals to be looped in and tapped in, we'll share a Zoom
16 link with them to be a part of that as well.

17 Q. All right. I notice on the first page it says JSU
18 not attending.

19 A. Yes.

20 Q. What does that mean?

21 A. Yes. So just like for fall of this year, that means
22 that Jackson State in the fall, they have, like, a career
23 expo, so it's not just educators there, and so we're
24 competing against already -- and it's other -- not teachers,
25 other businesses, so we decide to go -- especially since it

1 costs \$600 to attend that one, we just go and visit in the
2 fall and then we participate in the spring career fair at
3 Jackson State that's just for educators.

4 Q. I see. And so Jackson State University is listed
5 under the spring 2025 list?

6 A. Uh-huh.

7 Q. And also here there's University of Mississippi,
8 Mississippi College, Belhaven University, Delta State
9 University, William Carey University, Alcorn State
10 University, and some others; right?

11 A. Yes. Yes.

12 Q. Do you find -- what do you find in terms of your
13 recruiting of -- let's just focus on Black candidates -- at
14 a school like University of Mississippi or University of
15 Southern Mississippi, for that matter, or Mississippi State?

16 A. Okay. At University of Southern Mississippi, on
17 average maybe 15 educators that may come through and there
18 maybe three that are Black there, so with those, those same
19 efforts, such as, you know, offering them my business card,
20 following up with an email after the career fair. I do
21 follow up with, like I said an email, and that way if they
22 have any questions. Also giving them an overview of the
23 district makeup, because a lot of these students are not
24 familiar with the Rankin County area, so just talking to
25 them about those things there and going ahead and

1 encouraging them that the application process, you may just
2 want to go ahead and start it now and you can save your
3 application and pick back up later. So just giving them
4 manageable things and letting them know if they have a
5 question, that they can ask.

6 We have been able to recruit students -- like, I'm
7 thinking about Mississippi State. The one that we did the
8 on-the-spot interview for, we were able to get an
9 African-American candidate there. As a matter of fact, she
10 happened to be a product of Rankin County and moved back.
11 Of course, she's no longer with us because she moved out of
12 state, so knowing that we are competing with those efforts
13 as well.

14 I was just at a career fair and the table beside me
15 was offering their teachers \$60,000, and we don't offer
16 that.

17 Q. So there's competition from other states?

18 A. Yes.

19 Q. If you look on D-43, I'd like to ask if you recognize
20 this document.

21 A. I do.

22 Q. What is this?

23 A. This is a document where it's showcasing Rankin
24 County School District on Channel 12 with the Cool Schools.
25 They did a morning feature, and they came out and featured

1 our teacher -- teacher assistant apprenticeship program.
2 It's one of our grow-your-own efforts where students that --
3 high school students that are in our teacher academies, so
4 they've identified being interested in teaching, the
5 district has set aside funds to allow these students to be
6 employed through the district and earn money while also
7 serving in our -- our neighboring elementary schools.

8 MR. HOOKS: Your Honor, I'd like for D-43 to be
9 admitted.

10 A. And I will say that that has --

11 THE COURT: Hold on one second.

12 MS. FELDKAMP: Sorry to cut you off, Ms. Hollis.

13 Your Honor, we object to this as improper hearsay.

14 THE COURT: D-43 is admitted.

15 You may continue.

16 (Defendants' Exhibit 43 entered.)

17 THE WITNESS: I will say that that has also been a
18 great effort especially in making the education field appear
19 to be attractive. Like I said earlier, knowing that the
20 national teacher shortage and just students not interested
21 in the field of education, this also removes barriers for
22 students that may not have after-school transportation to
23 get to a job. This has been very key because they're right
24 next to the -- in close proximity to the elementary school
25 where they are employed.

1 BY MR. HOOKS:

2 Q. Now, you said something about a grow-your-own
3 program. What is that?

4 A. This is -- again, this fits that teacher assistant
5 apprentice and also with our teacher assistant. We do have
6 IHLs that come and speak to our univers- -- to our --
7 different universities that come and speak to our assistant
8 teachers because the goal is we want to grow the ones that
9 are there in our -- that's interested in education, so we
10 may have -- I know William Carey is one that we have had to
11 come and talk about their program. A lot of the assistant
12 teachers looking at the amount of money that they make,
13 their salaries, they are online appeals to them. So we have
14 definitely tried to take those factors into consideration.

15 Q. And that's an effort to continue recruiting more
16 teachers and identifying more teachers?

17 A. Yes.

18 Q. If you'll look with me, Ms. Hollis, at Exhibit 45, do
19 you recognize Exhibit 45? I believe it's already in
20 admission.

21 A. Yes. This is our elementary RISE Institute. It's in
22 collaboration with our -- Dr. Melissa McCray, our curriculum
23 director for elementary, but we also do it for secondary.
24 Of course, that director oversee that, but our HR department
25 work hand and hand with them.

1 Q. Well, the RISE program in terms of its basic purpose,
2 can you give us an overview of what it does?

3 A. Yes. Well, research does show that if a teacher does
4 not feel supported within -- in their first three years, the
5 likelihood of them leaving the field of education. So we
6 just want to --

7 MS. FELDKAMP: Objection, Your Honor. The witness
8 has not laid sufficient foundation for the research that she
9 is citing.

10 THE COURT: I'll overrule the objection.

11 You may continue.

12 THE WITNESS: Okay. Thank you.

13 A. The -- we just know that teachers want to feel
14 supported, and especially sometimes you just don't know what
15 you don't know, what questions to ask, so therefore,
16 mentorship has been another great effort that the district
17 has been able to maintain.

18 Q. All right. If you'll look with me on page 40 -- I'm
19 sorry, behind Tab 46, what is the significance of this
20 exhibit, this document?

21 A. Okay. This shows the list of new teachers along with
22 their mentor, and especially even like with the RISE
23 program, and it's also evident in this exhibit here, we have
24 also given great effort -- you'll notice that some new
25 teachers may have more than one mentor. If they are a Black

1 teacher, they may have a building-level mentor that may be
2 in their grade level but the principals have also gone to
3 extra efforts to make sure -- if at all possible, try to
4 pair them also with a Black mentor.

5 Q. All right. I want to call your attention on the
6 first page. I noticed some of the mentors have more than
7 one assignment. Do you see that?

8 A. Uh-huh. Uh-huh.

9 Q. Like Olivia Etheridge, do you see her on the second
10 page --

11 A. Oh, second page.

12 Q. -- at Northwest Rankin Elementary?

13 THE COURT: I think it's on the third page.

14 THE WITNESS: Oh. Okay.

15 MR. HOOKS: I'm sorry. Third page. My mistake.

16 A. Okay.

17 Q. Ms. Etheridge has three assignments there?

18 A. I don't see Ms. Etheridge.

19 Q. At Northwest Rankin Elementary, Olivia Etheridge.
20 There's a little number.

21 A. Oh, okay. I see it. Yes. Yes.

22 Q. Okay.

23 A. I was looking in the wrong column. Yes.

24 Q. She has three assignments?

25 A. Yes.

1 Q. And she's a White female?

2 A. Yes.

3 Q. Have you found this program to be effective?

4 A. As far as assigning --

5 Q. Mentors.

6 A. Yes.

7 Q. And how so?

8 A. Well, one of the things that -- even with our mentor
9 program, one of the things that they do is fill out the
10 surveys at the beginning of the year, and then we have the
11 post survey at the end, and so one of the things that the
12 mentor teachers shared in that was that maybe their mentor
13 teacher was a lot on them to have to mentor because they're
14 trying to teach their class while they're trying to help
15 them, so out of that, the decision was made with the
16 curriculum department to really try to get our retirees, so
17 that way you know still have more than mentor, but that way
18 your retiree does not have the time constraints as a regular
19 classroom teacher. Because what we were realizing is that
20 the mentor teacher was also suffering from burnout. So that
21 was a retention method that we wanted to identify and
22 rectify as well.

23 Q. Now, returning to the RISE exhibit, and you needn't
24 go there, but I want to ask you a question about it. I
25 noticed there was something about the opportunity myth.

1 What is that about?

2 A. Well, that was actually Dr. McCray. She -- our
3 curriculum director. She leads this. But basically they're
4 looking at the article and just looking at different things
5 pertaining to what's in that article and able to talk about
6 it within their -- light group is what -- they're paired --
7 obviously everybody that's new is in there, so they're able
8 to speak more together with people with the same lack of
9 experience.

10 Q. Now, I want to ask you a few questions about the --
11 we've talked about the recruiting process. Tell us about --
12 and we've talked about the application process. What about
13 interview process when candidates come for positions of
14 employment for interviews? How does that work?

15 A. Well, principals screen those applications and they
16 select who they would like to interview. At that point the
17 applicants' names are put on an interview spreadsheet, and
18 this past year we started a process where the HR department
19 will review those ahead of time to just make sure that there
20 is a diverse committee, if at all possible, that's looking
21 at -- that's a part of that and there's a diverse pool of
22 candidates.

23 Q. All right. And have you experienced or are you in a
24 position to tell the Court whether these various efforts
25 have been successful?

1 A. Yes. As a matter of fact, there was one that did not
2 have a diverse pool and I was able to notify my supervisor,
3 and she in turn was able to talk with that principal and,
4 you know, go from there. And then we have been able to add.
5 Our minority numbers have increased. So I would have to
6 attribute those to the efforts.

7 Q. Now, you say your minority numbers. Are you
8 specifically referring to Black teachers?

9 A. Yes. Yes.

10 Q. And how has it increased?

11 A. Well, back in 2017-2018 school year, there were about
12 97, and so for this school year, as of last)for the '25-'26
13 school year, we have 238 Black teachers.

14 Q. Now, a moment ago we talked about the requirement in
15 one of the orders that mentioned a 28 percent goal. What is
16 your understanding of that, and what can you tell the Court
17 about that?

18 A. Well, it was in the 1978 court order. Not sure how
19 the 28 percent -- how that came up, where that number came
20 from, but I am aware of that number there.

21 Q. All right. And is the district, in your opinion,
22 carrying out a robust recruiting program for all qualified
23 teachers but including minority teachers and including Black
24 teachers?

25 A. My answer is yes. And the data speaks for that based

1 on the numbers that I mentioned earlier. As a matter of
2 fact, our population of Black teachers is now 15 percent,
3 and the national average of Black teachers is about 7
4 percent, so we have doubled that.

5 Q. All right. Did the district hire recently for
6 '25-'26 any principals who oversee the schools?

7 A. Yes.

8 Q. How many?

9 A. Well, total -- you mean in total, or how many did we
10 hire?

11 Q. How many did you hire?

12 A. Okay. It was four -- no, three. Northwest High.

13 Q. Okay. What was the position at Northwest High?

14 A. Principal.

15 Q. And who did you hire for that position?

16 A. Dr. Terrance McEwen. He was an assistant principal
17 there.

18 Q. I see. And what is his race?

19 A. Black.

20 Q. And is Northwest High the largest school you have in
21 the district?

22 A. Yes. It's one of the two 7A schools.

23 Q. Did you hire an African-American to be principal at
24 any other of the district schools?

25 A. Yes. Florence. Florence. A Black principal.

1 Q. I see. So I believe you said of the three principals
2 hired for this school year, two of them are
3 African-American?

4 A. Yes.

5 Q. Now, with respect to the participation that faculty
6 throughout the school district have in various committees
7 and so on, can you tell the Court about that?

8 A. As far as various committees, just like with the
9 application pool, as far as committees, it's by choice. So
10 if a -- if an individual or if a teacher is interested in a
11 committee, they have a way that they can express to their
12 principal that he or she is interested in that, you know,
13 being a part of a committee.

14 MR. HOOKS: Your Honor, if I could have just one
15 moment?

16 Your Honor, I have no further questions.

17 THE COURT: All right. Cross-examination.

18 Ms. Feldkamp, while you're getting in place, I had a
19 question that the district can follow up on.

20 We're talking about committees and teachers
21 volunteering to be on committees or asking to be on
22 committees. Is the district able to require teachers to be
23 on committees?

24 THE WITNESS: No. I mean, I'm sure we could, but we
25 don't. Again, we look at that as teacher retention.

1 THE COURT: Okay. Understood.

2 CROSS-EXAMINATION

3 BY MS. FELDKAMP:

4 Q. Good afternoon, Ms. Hollis.

5 A. Good afternoon.

6 Q. Good to see you again.

7 A. Yeah.

8 Q. Now, Ms. Hollis, you review faculty demographics on a
9 regular basis in your job; is that right?

10 A. Regular as in at least once, yes.

11 Q. Quite often sometimes --

12 A. Yes.

13 Q. -- every week; is that right?

14 A. I'm not going to say I review it every week, no. I
15 don't review it every week.

16 Q. But you review them on a regular basis --

17 A. Yes.

18 Q. -- as part of your job responsibilities?

19 A. Yes.

20 Q. Including to determine compliance with the orders in
21 this case?

22 A. Yes.

23 Q. And to see if there are any concerning patterns
24 showing inadequate representation of Black faculty in
25 different positions?

1 A. Yes.

2 Q. Such as teachers, principals, counselors, that sort
3 of thing?

4 A. Yes.

5 Q. And it is your position that in order to determine if
6 there is adequate representation in those positions, you
7 must also look at who has actually applied for those
8 positions; is that right?

9 A. I could look at it. I don't always look at it
10 because, again, we may have -- it's nothing -- you know, not
11 uncommon to have 150 applicants.

12 Q. But you previously testified that if there was
13 someone who was overlooked or somebody that was not hired
14 because of their race, that would be a cause for concern?

15 A. Yes. Yes.

16 Q. But without that information, you may not have a
17 concern about inadequate representation?

18 A. Do you mind repeating that?

19 Q. But without that information, you may not have a
20 concern about inadequate representation; is that right?

21 A. Without what information?

22 Q. Information about who applied for the position.

23 A. No. I don't have to know who applied. I can look at
24 the numbers or the percentages.

25 Q. Ms. Hollis, you are aware that the district is under

1 an order to desegregate its faculty?

2 A. Yes.

3 Q. And do you recall that you gave a deposition in this
4 case?

5 A. Yes, I do remember.

6 Q. Do you recall that at that deposition you testified
7 that in order to determine if there is adequate
8 representation, you must look at who has applied?

9 A. I don't recall that being the context of the
10 question.

11 Q. I will move along. Now, you're aware that the metric
12 for desegregation is not related to who has applied; is that
13 right?

14 A. Correct.

15 Q. It is instead related to whether the proportion of
16 Black faculty at that school is substantially the same as
17 the district-wide percentage?

18 A. Yes.

19 Q. And you consider in your review whether the
20 percentage of Black faculty at a given school is more than
21 20 percentage points away from the district-wide average; is
22 that right?

23 A. I don't decide that.

24 Q. You just testified on direct examination that that is
25 a metric that you look at?

1 A. I'm a part of the team that looks at that, yes.

2 Q. And so you will consider whether a school's Black
3 faculty percentage is is 20 percentage points or more away
4 from the district-wide average; is that right?

5 A. Yes.

6 Q. And you are aware that a number of schools in the
7 district have been identifiable in the past five years?

8 A. Yes. The ones that we looked at on the chart.

9 Q. Now, I'd like to pull up Defendants' Exhibit 30. We
10 can refer to that together.

11 THE COURT: I think it's in that first binder, maybe.

12 THE WITNESS: Oh.

13 BY MS. FELDKAMP:

14 Q. We'll also put it up on the screen for you because
15 it's not got page numbers. It's a bit unwieldy.

16 A. Okay.

17 Q. I'd like to talk about some of the other schools
18 beyond the ones that you've already testified to. I'd like
19 to direct our attention to the data for the 2023-'24 school
20 year and to scroll to the next page so we can take a look at
21 Pisgah.

22 A. Uh-huh.

23 Q. Now, Ms. Hollis, during the 2023-'24 school year,
24 Pisgah High School had zero Black teachers?

25 A. Are you in the 20- -- you said prior to?

1 Q. During the 2023-'24 school year, Pisgah High School
2 had zero Black teachers?

3 A. That's not correct according --

4 Q. On the screen in front of you, are you able to see?

5 A. Oh, you're saying Pisgah High School.

6 Q. Yes, that's right.

7 A. Okay. I was looking at Pisgah Elementary.

8 Q. Oh, no worries. Okay. So just to clarify for the
9 record, Pisgah High School had zero Black teachers --

10 A. Yes.

11 Q. -- during the 2023-'24 school year? Okay.

12 A. Uh-huh.

13 Q. Thank you, Ms. Hollis. And I'd now like to direct
14 your attention to the 2022-'23 school year, and we'll also
15 look at Pisgah for that year.

16 During that year, Pisgah High School also had zero
17 Black teachers; is that right?

18 A. That's correct.

19 Q. Now, while we're on this page, I think we can -- need
20 to scroll back up a little bit so that we can see Puckett
21 for the 2022-'23 school year. So that might be the page
22 above this one. There we go.

23 Now, Ms. Hollis, during the 2022-'23 school year,
24 Puckett Elementary had zero Black teachers; is that right?

25 A. That's correct.

1 Q. And if we look at the 2021-'22 school year, Puckett
2 Elementary also had zero Black teachers that year?

3 A. That's correct, yes.

4 Q. And if we look at the 2020-'21 school year, Puckett
5 Elementary once again had zero Black teachers; is that
6 right?

7 A. Yes.

8 Q. So that is three consecutive years that Puckett
9 Elementary had no Black teachers?

10 A. Yes. And -- yes. Uh-huh.

11 Q. Going back to the 2021-'22 school year -- I
12 appreciate you bearing with me flipping through these pages.

13 A. You said '21-'22?

14 Q. That's correct.

15 A. Yes.

16 Q. Highland Bluff Elementary also had zero Black
17 teachers?

18 A. Yes.

19 Q. And you also testified, Ms. Hollis, that McLaurin has
20 been outside of the plus or minus 20 percent range for
21 multiple years; is that right?

22 A. Yes.

23 Q. And the first year for which we have data showing it
24 within range is this current school year; is that correct?

25 A. Yes.

1 Q. The Learning Center has also been outside of the plus
2 or minus 20 percent range is; that right?

3 A. Yes.

4 Q. And it continues to be?

5 A. Yes.

6 Q. So for at least five consecutive years, it has been
7 outside of that range?

8 A. Well, the range just means that we're looking more
9 closely at it. Also, I did not take this position until
10 2022, so you're referencing data that was before my time.

11 Q. You're familiar with the data in front of you?

12 A. Yes.

13 Q. Okay. So just direct you back to my question. The
14 Learning Center has been outside of range for at least five
15 years; is that correct?

16 A. According to the chart, yes.

17 Q. Thank you, Ms. Hollis. I think we are done with this
18 chart for the moment.

19 Now, you are also familiar with the requirements of
20 the 1978 order; is that right?

21 A. Yes.

22 Q. And that order states that the district will, through
23 attrition, achieve a ratio of at least 28 percent Black
24 staff at every level and in all categories; is that correct?

25 A. Yes. That's what I recall.

1 Q. The district is falling short of that level, is it
2 not?

3 A. According to the percentage, but according to the
4 national average, no, because if the national average is
5 only 7 percent, how are we going to get to 28?

6 Q. Just to go back to my question, the district is
7 falling short of that 1978 percentage, is it not?

8 A. Statistically, yes. But if you only have 7 percent
9 to pull from, how would you ever get to 28? And we are
10 making efforts where we're growing.

11 Q. Ms. Hollis, the proportion of Black faculty in the
12 district, you previously testified, is about 10 to
13 15 percent below the 1978 level; is that correct?

14 A. It is at 15 percent.

15 Q. And if we break that out by grade band, we can look a
16 little closer, can we not?

17 A. If you want to, yes. Sure.

18 Q. I'd like to pull up Plaintiffs' Exhibit 33. You may
19 need to switch binders for this, but we'll of course also
20 pull it up.

21 THE COURT: I think it's on the other side.

22 P-33, Ms. Feldkamp?

23 MS. FELDKAMP: That's right.

24 THE COURT: It's not in evidence yet. So we can
25 display it to the witness, but not the room.

1 MS. FELDKAMP: I see. Okay. I believe we have the
2 defendants' version of this, perhaps, in evidence.

3 BY MS. FELDKAMP:

4 Q. Ms. Hollis, are you familiar with this information?

5 A. Yes.

6 Q. And can you describe it for the Court, please.

7 A. Without the time -- I'm not sure if it's the -- what
8 school year it is, but it outlines our number of full-time
9 teachers by race. It looks at them as a district as a whole
10 as well as the full-time teachers by race broken down by
11 school, our part-time, our principals, and our different
12 administrators.

13 Q. And, Ms. Hollis, if I represent to you that this data
14 is for the 2025-'26 school year, would that look right to
15 you?

16 A. Yes. And I noticed that when I saw it's was 238
17 Black, uh-huh.

18 MS. FELDKAMP: Plaintiffs move to enter this into
19 evidence as the 2025-'26 faculty and staff information.

20 THE COURT: As P-33?

21 MR. HOOKS: No objection.

22 THE COURT: And the defense doesn't have an
23 exhibit like this that's already been entered, just to make
24 sure?

25 MR. HOOKS: Your Honor, we withdrew this exhibit

1 after it was objected to.

2 THE COURT: It's fine. It's fine. I just don't want
3 to have a duplicate. P-33 is admitted.

4 MS. FELDKAMP: I apologize, Your Honor. I think we
5 should clear up what has been withdrawn. It was our
6 understanding that the 2025-'26 data had been kept in the
7 record. If it's not, I would like to withdraw this exhibit
8 immediately, but we do want to remove the '24-'25 data.

9 THE COURT: '25 and '26 has not been excluded.

10 MS. HOLMES: We included in our teacher chart, but we
11 don't have --

12 THE COURT: That's fine. All I was making sure is we
13 don't have the same exhibits in, but if it's not, P-33 is
14 admitted.

15 MR. HOOKS: We have no objection to this exhibit.

16 THE COURT: Gotcha.

17 MS. FELDKAMP: And, Your Honor, we would like the
18 Court's leave to provide an updated version of this exhibit
19 without the data that has been excluded. Would that be
20 amenable to the Court?

21 THE COURT: The data that was excluded I think was
22 '24-'25.

23 MS. FELDKAMP: And that is also included in the
24 spreadsheet, but we won't be referring to those numbers.
25 It's in a -- they're in separate tabs.

1 THE COURT: Okay. So what are you asking of me? I'm
2 just making sure we're on the same page.

3 MS. FELDKAMP: If when we provide the exhibit to you,
4 we can provide an updated version that removes the tabs that
5 have now been excluded from the record.

6 THE COURT: Which would be '24-'25?

7 MS. FELDKAMP: That's correct.

8 THE COURT: All right. That's fine.

9 MS. FELDKAMP: Thank you, Your Honor.

10 THE COURT: Okay. That's fine.

11 (Plaintiffs' Exhibit 33 entered.)

12 BY MS. FELDKAMP:

13 Q. So, Ms. Hollis, I'd like to direct your attention to
14 the tab that's currently displayed on your screen, which
15 might be a little easier to refer to than the paper version.
16 It's labeled '25-'26 certified information. And I'd like to
17 direct your attention to columns A and B.

18 And I'm going to ask Ms. Oliver, who is assisting me,
19 to help us do a little math for your reference here. We can
20 see that there are 238 Black full-time teachers in the
21 district; is that right?

22 A. Yes.

23 Q. And 1,274 White teachers; is that correct?

24 A. Yes.

25 Q. Then a number of other teachers of other races; is

1 that correct?

2 A. Yes.

3 Q. So what I wonder if it might be easier if we just do
4 it as a sum of that column.

5 And so that gives us a total of 1,529 teachers; is
6 that correct?

7 A. I can't do the math.

8 Q. If you look to Ms. Oliver assisting us on the bottom
9 right of the screen?

10 A. Yes, I see the column down at -- yes.

11 Q. Okay. Does that math look correct to you?

12 A. Yes.

13 Q. And so if we take the percentage of Black teachers as
14 a total of the overall amount, that gives us about
15 15.5 percent Black teachers district-wide. And we can walk
16 you -- display that math for you. I believe we would do
17 that as a percentage of 238, the number of Black teachers,
18 over 1,529, which is the total number of teachers. That
19 gives us about 15.5 percent Black teachers district-wide; is
20 that correct?

21 A. Yes. That's what I referenced earlier.

22 Q. And are you aware of how many of the elementary
23 schoolteachers in the district are Black by percentage?

24 A. I don't know the breakdown exactly. I mean, we can
25 look at that, but I don't -- from recollection, I can't

1 recall.

2 Q. If I represent to you that only approximately
3 12 percent of the elementary schoolteachers in the district
4 are Black, would that sound right to you?

5 A. Well, if you look at the total -- if you're looking
6 at the full-time, how would you know how many of that total
7 in column A and B -- wouldn't you have to break that down to
8 know how many of those are elementary?

9 Q. Do you recall that during your deposition we
10 discussed that the ratio of Black elementary schoolteachers
11 was a bit lower than middle and high school teachers?

12 A. Yes.

13 Q. And you testified that your office has not examined
14 why that ratio is particularly low among elementary
15 schoolteachers; is that right?

16 A. Right.

17 Q. I'm going back to the district-wide standard.
18 15.5 percent is about 12-1/2 points short of that 28 percent
19 level in the 1978 order; is that right?

20 A. Yes.

21 Q. In contrast, Black students comprise 28 percent of
22 students in the district?

23 A. Uh-huh.

24 THE COURT: Is that a "yes"?

25 THE WITNESS: Yes.

1 BY MS. FELDKAMP:

2 Q. And, Ms. Hollis, are you aware that Black residents
3 of Rankin County make up 22.4 percent of the county's
4 overall population?

5 A. I am aware of that, yes.

6 Q. So that is -- so the proportion of Black teachers
7 district-wide is about seven percentage points below that;
8 is that correct?

9 A. Yes. But also in that 22 percent that make up the
10 Black residents in Rankin County, I'm not sure if all of
11 them are eligible to be teachers.

12 Q. But that percentage is about seven points below?

13 A. Well, I just want to make it known for the record
14 that if we're looking at percentage-wise, that's looking at
15 the total population. So if you're combining classified and
16 certified, our Black population is about 21 percent, if you
17 combine our Black population of classified and certified,
18 whereas in the full-time teachers, that's certified only.

19 Q. So to sum up, the percentage of Black teachers
20 district-wide is lower than the percentage of Black students
21 district-wide?

22 A. Yes. But according to the court order, it's still
23 showing progress.

24 Q. And it is lower than the 1978 court order level?

25 A. And we are actively recruiting, yes. And we have no

1 control over how many -- we can't -- we don't go out and
2 recruit Black or White students to come to our schools. So
3 that number is a variable that's going to constantly change.

4 Q. I want to make sure we get a clear answer on the
5 record. What was your answer to my question?

6 A. Do you mind restating your question?

7 Q. It's also below the 1978 court order level?

8 A. Yes.

9 Q. And below the population for the county as a whole?

10 A. No. Because, again, I cannot answer that truthfully
11 because I do not know what population of those -- of that
12 20 percent that's Rankin County would be eligible to be
13 full-time teachers.

14 Q. Is 15.5 percent lower than 22.4 percent?

15 A. Yes, it is.

16 Q. Now, the 1970 consent order in this case also
17 prohibits the district from hiring, assigning, promoting,
18 paying, dismissing, or demoting on the basis of race; is
19 that right?

20 A. That's correct.

21 Q. And as we discussed a bit ago, you review a good
22 amount of faculty data in your role?

23 A. Yes.

24 Q. That is one of the key parts of your job?

25 A. Yes.

1 Q. But you do not review data on promotions by race for
2 disparities, do you?

3 A. Do I review?

4 Q. Data on promotions by race in order to look for
5 disparities?

6 A. I review the data, but not going at it for that.

7 Q. And you do not review data about pay to look for
8 racial disparities, do you?

9 A. Well, there would be no reason for there to be a
10 disparity because we have a board-approved, certified scale.

11 Q. So the answer to my question is no, you do not
12 conduct that review?

13 MR. HOOKS: Your Honor, I object.

14 A. It would be irrelevant.

15 THE COURT: Hold on.

16 MR. HOOKS: I object to that. I believe we're
17 getting into some argumentive questioning. The witness said
18 there's no reason for her to review that because the
19 district operates --

20 THE COURT: I understood. So the objection's
21 argumentative.

22 MR. HOOKS: Yes, ma'am.

23 THE COURT: Okay. I'm going to overrule the
24 objection for now. You may proceed.

25 BY MS. FELDKAMP:

1 Q. And you do not review data on department heads by
2 race, do you?

3 A. Department heads, yes. Uh-huh.

4 Q. Do you recall giving a deposition in this case?

5 A. I don't recall if that specific question was asked.

6 MS. FELDKAMP: I'll ask the Court's indulgence for
7 one moment, Your Honor.

8 BY MS. FELDKAMP:

9 Q. And do you recall that you testified that your --
10 that the district does maintain department head data by
11 race?

12 A. Yes, we do.

13 MS. FELDKAMP: I'd like to display the first page of
14 the witness's deposition transcript.

15 THE COURT: Are you going to put it on the Elmo, or
16 what's the plan?

17 MS. FELDKAMP: I believe we --

18 THE COURT: The presentation?

19 MS. FELDKAMP: That's right.

20 THE COURT: Okay.

21 BY MS. FELDKAMP:

22 Q. Ms. Hollis, does this look familiar to you?

23 A. Yes.

24 Q. What is it?

25 A. The transcript of the deposition.

1 Q. And we can scroll through it if you like, but does it
2 look like a faithful and accurate copy of that transcript?
3 We're happy to scroll through it if you prefer.

4 A. Yes, I prefer.

5 MS. FELDKAMP: Just scroll through it a little bit so
6 she can see.

7 BY MS. FELDKAMP:

8 Q. I can also provide you with a paper copy if you'd
9 like to look through it.

10 A. Yes, please.

11 MS. FELDKAMP: May I approach?

12 THE COURT: You may. You may. It's fine.

13 MS. FELDKAMP: Thank you.

14 THE COURT: And, Ms. Feldkamp, if you'll give her an
15 opportunity to flip through if she needs to, but if you'll
16 direct her to where you're going to ask her questions so we
17 can move it along.

18 MS. FELDKAMP: Of course.

19 BY MS. FELDKAMP:

20 Q. And, Ms. Hollis, I will ultimately be directing you
21 to page 76 of your deposition.

22 A. Okay.

23 Q. Please let me know when you feel you've had a chance
24 to review it for accuracy, the transcript.

25 A. Oh, the transcript, yes. Uh-huh.

1 Q. Does this appear to be a faithful and accurate copy
2 of your transcript?

3 A. Yes.

4 Q. I'd like to direct your attention to page 76 of the
5 transcript. It's also on the screen in front of you. And
6 I'd like you to follow along as I read aloud.

7 On line 22, I asked you: Does your department
8 regularly review that data? Referring to department head
9 data.

10 And your response on the subsequent line: The HR
11 department, no.

12 Is that a faithful and accurate reading of that
13 exchange?

14 A. Yes. Uh-huh.

15 MS. FELDKAMP: May I approach the witness to retrieve
16 my binder, Your Honor?

17 THE COURT: You may.

18 A. When you said "review," we're also pulling reports
19 for the superintendent and the -- so to me that's two
20 different interpretations of the question.

21 BY MS. FELDKAMP:

22 Q. So to clarify, your office does not then review that
23 data for disparities?

24 A. Yes, we do review that information and share it with
25 the -- but we pass the information on to our supervisors --

1 or to my supervisor.

2 Q. In the transcript we just read, you responded no to a
3 question of whether you regularly review that data?

4 A. Well, and also, like, "regularly," I don't know --
5 that word is a broad term. I don't know if that means once
6 a month, once a nine weeks, once a year.

7 Q. Thank you, Ms. Hollis.

8 A. It goes back to the interpretation of the question.

9 Q. Thank you, Ms. Hollis.

10 A. You're welcome.

11 MS. FELDKAMP: We can take this down for the moment.

12 BY MS. FELDKAMP:

13 Q. I'd like to turn now to a different topic and talk a
14 bit about Black principals, assistant principals, and school
15 leaders in the district. Now, you spoke on your direct
16 about the 1978 order in this case and its requirement that
17 in no school zone shall the overall principal and high
18 school principal be of the same race; is that right?

19 A. Yes.

20 Q. And that also under no circumstances should all
21 principals be of the same race; is that right?

22 A. Yes.

23 Q. I'd like to now display what's been marked as
24 Plaintiffs' Exhibit 36. And you may -- we're going to ask
25 you to flip to it in the binder, because I believe it's not

1 been admitted yet.

2 A. You said 36?

3 Q. That's right. Are you familiar with this document?

4 A. Yes.

5 Q. What is it?

6 A. The school leadership team for the school year

7 '23-'24.

8 Q. And can you provide a brief overview of what school
9 leadership teams are, Ms. Hollis?

10 A. The principals as well as their teachers that have
11 identified themselves wanting to be a part of the voluntary
12 leadership team.

13 Q. And that also includes assistant principals; correct?

14 A. Yes.

15 MS. FELDKAMP: Plaintiffs move this into evidence as
16 the '23-'24 school leadership teams information.

17 MR. HOOKS: No objection.

18 THE COURT: All right. P-36 is admitted.

19 (Plaintiffs' Exhibit 36 entered.)

20 BY MS. FELDKAMP:

21 Q. Ms. Hollis, we're going to spend some time with this
22 document.

23 THE COURT: Well, we're going to stop for the day,
24 then.

25 MS. FELDKAMP: We're going to stop right now? Okay.

1 Well, we're going to come back to this tomorrow.

2 THE COURT: Yeah. Yeah. We'll see if you're this
3 smiley in the morning. Yeah. It's getting later in the
4 day, and if it's going to take a while on this topic, I
5 won't interrupt you.

6 MS. FELDKAMP: Yes. This would have been quite a
7 long line of questioning.

8 THE COURT: Okay. All right. Let's plan to recess
9 for now. I'm going to keep the lawyers to go over a couple
10 of things, but let's start back tomorrow at 9:00 a.m. versus
11 9:30.

12 You can go ahead and step down. But I'm keeping you
13 here just to say be back ready to go in the witness room,
14 which is on this side right when you walk in, about 8:45,
15 and as soon as we get everybody in here, we'll get going
16 right at 9:00, okay? But you're on cross-examination right
17 now, which means you don't need to discuss your testimony
18 with anyone, and we will see you bright and early in the
19 morning.

20 THE WITNESS: All right. Thank you.

21 THE COURT: All right. Counsel for -- again, we'll
22 get going at 9:00 a.m. On exhibits, because it's a bench
23 trial, I've been a little lax with the exhibits. Usually
24 what I say do is when I say D-2 is admitted, the attorneys
25 walk up to the courtroom deputy and hand it to her in that

1 moment. To move things along, we've not been doing that.
2 We have a list of everything that has been admitted, so what
3 I want in the morning, all the exhibits, if it's a
4 defendants' exhibit, even if the other side moved it, I
5 would just ask for the ones that have been admitted so far
6 for you to hand paper copies to the CRD of all the admitted
7 exhibits.

8 Same for the plaintiffs. On y'all's exhibit, I
9 noticed in the binders some are not premarked, so just --
10 maybe they are and there's just not an exhibit sticker and
11 I'm not seeing it, and it's fine, but same thing. If you
12 all will in the morning -- there's only a few right now on
13 the plaintiffs' side, but if you'll hand to Ms. Cossar paper
14 copies of exhibits from the plaintiffs' side that have been
15 admitted. It's fine if they -- I know that y'all have some
16 that are in binders. It's fine if they have holes punched
17 in them. It's okay as long as there's not any information
18 that's not visible because of the hole punching.

19 All right. Anything else we need to take up?

20 MS. HOLMES: Your Honor, one housekeeping question.
21 I believe you ruled that the two -- the three witnesses who
22 were plaintiffs' witnesses who were excluded may be
23 permitted to provide comment to the Court. Can you give us
24 an estimate of what the time limits will be for those
25 comments?

1 THE COURT: From start to finish, no longer than ten
2 minutes. So five minutes on direct, five minutes on cross.

3 MS. HOLMES: Thank you, Your Honor.

4 THE COURT: I want to -- I don't want to -- I'm
5 worried about our time already. Here I was thinking we'll
6 be done in two days and now y'all got me worried that --
7 Friday I'm in Hattiesburg for criminal things, so you all
8 have three days and no more. But ten minutes if -- we'll
9 see where we are, but Wednesday -- is that tomorrow? My
10 week's already getting away from me.

11 MS. HOLMES: Yes. We need to do it tomorrow.

12 THE COURT: Is there a particular time that the
13 individuals have been told to be here?

14 MS. HOLMES: We haven't, but if there's a time that
15 the Court would prefer since they are here, if they're in
16 town now, we can --

17 THE COURT: No. What I don't want to do is I want to
18 start back with this witness in the morning, so possibly
19 before we break for lunch or when we come back from lunch.

20 MS. HOLMES: Okay.

21 THE COURT: Just not first thing in the morning. I'd
22 like to keep the testimony rolling.

23 MS. HOLMES: Yes. We can do that, Your Honor.

24 THE COURT: Our local counsel, thank you, sir, for
25 being here. These lawyers have been very well behaved. We

1 have local counsel since y'all may not be invested down
2 here, and so we have local counsel to make sure. But you
3 all have been consummate professionals, and so local counsel
4 may be excused for the remainder of the hearing.

5 MR. BADAT: I'll take full credit for that.

6 THE COURT: Okay. If they backslide, we may call you
7 back. But I don't think we'll have a problem with that, but
8 thank you for being here.

9 From the district, is there anything that I need to
10 take up, any questions or otherwise?

11 The other thing I'd ask y'all to do on exhibits,
12 there were a lot of district exhibits admitted today.
13 Plaintiffs, if y'all will kind of look through your exhibit
14 list, if there's anything that overlaps, let's try not to
15 move something in that's already in, if possible. That will
16 save us some paper later.

17 But thank you all. I will see everyone bright and
18 early in the morning.

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CERTIFICATE OF COURT REPORTER

I, Candice S. Crane, Official Court Reporter
for the United States District Court for the Southern
District of Mississippi, do hereby certify that the above
and foregoing pages contain a full, true, and correct
transcript of the proceedings had in the forenamed case at
the time and place indicated, which proceedings were
stenographically recorded by me to the best of my skill and
ability.

I further certify that the transcript fees and
format comply with those prescribed by the Court and
Judicial Conference of the United States.

THIS, the 3rd day of October, 2025.

/s/ Candice S. Crane, RPR, RCR, CCR

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