

Exhibit B

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1 SCOTT M. KENDALL, Bar No. 166156  
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3 A Professional Corporation  
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5 Sacramento, CA 95864  
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7 Facsimile: (916) 972-1335  
8 Attorneys for plaintiff PLANS, INC.

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10	PLANS, Inc.,	)	CASE NO. CIV. S-98-0266 FCD PAN
11		)	
12	v.	)	<b>ANSWER TO INTERROGATORIES;</b>
13	SACRAMENTO CITY UNIFIED SCHOOL	)	<b>SET NO. TWO</b>
14	DISTRICT, TWIN RIDGES ELEMENTARY	)	
15	SCHOOL DISTRICT, DOES 1 - 100,	)	
	Defendants.	)	

TRIAL: October 12, 1999

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17 Propounding Party: SACRAMENTO CITY UNIFIED SCHOOL DISTRICT  
18 Answering Party: PLANS, INC.  
19 Set No: Two

20 INTERROGATORY NO. 19:

21 State each and every fact which supports your claim that "[t]he purpose of Waldorf education  
22 is to teach the principles of Anthroposophy."

23 ANSWER:

24 Objection: Overly broad and burdensome; asked and answered. Without waiving said  
25 objection, plaintiff answers as follows: See response to Interrogatory No. 1; see responses to Request  
26 for Production of Documents, Set No. 1. Requesting defendant is further referred to teacher training  
27 materials provided to its teachers, and in the possession of defendants and its agents.

1 INTERROGATORY NO. 20:

2 State the name, address, and telephone number for each and every person having personal  
3 knowledge of your responses to Interrogatory No. 19.

4 ANSWER:

5 Objection: Overly broad and burdensome. Without waiving said objection, plaintiff answers  
6 as follows: Plaintiff's disclosed experts; plaintiff's previously disclosed officers; defendants'  
7 employees and agents that have participated in Waldorf teacher training, instruction, and  
8 administration; parents and children subjected to Waldorf methods; employees and agents of  
9 Waldorf connected organizations.

10 INTERROGATORY NO. 21:

11 State each and every fact which supports your claim that "[c]hildren at both schools were  
12 subjected to religious ritual, including saying and writing prayers, producing art with occult  
13 symbolism, participating in religious festivals, reincarnation ceremonies, religious dance,  
14 Anthroposophical alters in the classroom, and exposure to an Anthroposophical curriculum."

15 ANSWER:

16 Objection: Overly broad and burdensome; vague and ambiguous; unintelligible. Without  
17 waiving said objection, plaintiff answers as follows: See response to Interrogatory No. 1; see  
18 responses to Request for Production of Documents, Set No. 1.

19 INTERROGATORY NO. 22:

20 State the name, address, and telephone number for each and every person having personal  
21 knowledge of your response to Interrogatory No. 21.

22 ANSWER:

23 Objection: Overly broad and burdensome. Without waiving said objection, plaintiff answers  
24 as follows: Defendants' employees and agents that have participated in Waldorf teacher training,  
25 instruction, and administration; parents and children subjected to Waldorf methods.

26 INTERROGATORY NO. 23:

27 State each and every fact which supports your claim that "[s]tudents in the Sacramento  
28 Waldorf school were required to walk in a posture of occult prayer."

1 ANSWER:

2 Objection: Overly broad and burdensome; vague and ambiguous; unintelligible. Without  
3 waiving said objection, plaintiff answers as follows: See response to Interrogatory No. 1; see  
4 responses to Request for Production of Documents, Set No. 1.

5 INTERROGATORY NO. 24:

6 State the name, address, and telephone number for each and every person having personal  
7 knowledge of your response to Interrogatory No. 23.

8 ANSWER:

9 Objection: Overly broad and burdensome. Without waiving said objection, plaintiff answers  
10 as follows: Defendants' employees and agents that have participated in Waldorf teacher training,  
11 instruction, and administration; parents and children subjected to Waldorf methods.

12 INTERROGATORY NO. 25:

13 State each and every fact which supports your claim that "[t]he Sacramento City Unified  
14 School District was heavily influenced in its decision to adopt Waldorf Curriculum in the public  
15 school by Rudolf Steiner College."

16 ANSWER:

17 Objection: Overly broad and burdensome. Without waiving said objection, plaintiff answers  
18 as follows: See defendant Sacramento City Unified School District's Response to Interrogatories, Set  
19 No. 1, responses to interrogatory Nos. 1, 2, 3, 8, 9, 18, and Exhibit 1.

20 INTERROGATORY NO. 26:

21 State the name, address, and telephone number for each and every person having personal  
22 knowledge of your response to Interrogatory No. 24.

23 ANSWER:

24 Overly broad and burdensome; unintelligible. Without waiving said objection, and assuming  
25 that defendant's interrogatory refers to interrogatory no. 25., plaintiff answers as follows:  
26 Sacramento County Unified School District members during 1995, 1996, and 1997 sessions; the  
27 persons identified by Sacramento City Unified School District's Response to Interrogatories, Set No.

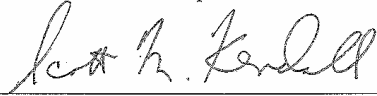
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1 1, responses to interrogatory Nos. 1, 2, 3, 8, 9, 18. Rudolf Steiner College officers, employees, and  
2 agents.

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Dated: March 4, 1999

McKINLEY & SMITH  
A Professional Corporation

By:   
SCOTT M. KENDALL,  
Attorney for PLANS, Inc.

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VERIFICATION TO FOLLOW

PLANS, INC. v. SACRAMENTO CITY UNIFIED SCHOOL DISTRICT, et al.  
United States District Court (Eastern District) Case No. CIV-S-98-0266 FCD PAN

**AFFIDAVIT OF SERVICE**

STATE OF CALIFORNIA )  
 ) ss.  
County of Sacramento )

THE UNDERSIGNED, being sworn, says that he/she is a citizen of the United States, over 18 years of age, employed in Sacramento County, and not a party to the within action; that affiant's business address is 3435 American River Drive, Suite B, Sacramento, CA 95864.

On **THIS DATE**, I served the [x] original [ ] a true copy of the foregoing document(s):

**ANSWER TO INTERROGATORIES; SET NO. TWO**

on the parties involved addressed as follows:

Michelle L. Mueller, Esq.  
GIRARD & VINSON  
1006 Fourth Street, Suite 701  
Sacramento, CA 95814-3314

**BY MAIL:** I caused each envelope addressed as above, with postage thereon fully prepaid, to be sealed and placed for collection and mailing on that date following ordinary business practices of collection and processing correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

**BY PERSONAL DELIVERY:** I caused each such envelope to be delivered by hand to the offices of each addressee or to the addressee above.

**BY FACSIMILE:** By use of a facsimile machine, I served a copy of the within document(s) on the above-interested parties at the facsimile numbers listed above. The transmission was reported as complete without error. The transmission report, which is attached to this proof of service, was properly issued by the transmitting facsimile machine.

Executed on **MARCH 4, 1999**, at Sacramento, California.  STATE: I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

FEDERAL: I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

  
\_\_\_\_\_  
MARIA MAESTAS