

Exhibit H

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1 SCOTT M. KENDALL, SBN 166156
2 Law Offices of Scott M. Kendall
3 8788 Elk Grove Blvd., Bldg. 1, Suite I
4 Elk Grove, CA 95624-1768
5 (916) 685-7700

6 Attorney for Plaintiff PLANS, INC.

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 PLANS, Inc.,

10 Plaintiff,

11 vs.

12 SACRAMENTO CITY UNIFIED SCHOOL
13 DISTRICT, TWIN RIDGES ELEMENTARY
14 SCHOOL DISTRICT, DOES 1-100,
15 Defendant

) Case No.: CIV. S-98-0266 FCD PAN

) RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS

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17 DEMANDING PARTY: Defendants SACRAMENTO CITY UNIFIED SCHOOL DISTRICT

18 And TWIN RIDGES ELEMENTARY SCHOOL DISTRICT

19 RESPONDING PARTY: Plaintiff PLANS, INC.

20 SET NO.: Two

21
22 DOCUMENT REQUEST NO. 1:

23 Any and all documents which evidence, support, relate or refer to your responses to the
24 Interrogatories, Set No. 3 served concurrently herewith.

25 RESPONSE:

26 Each document identified by defendants in their response to interrogatories relating to books that
27 are in the custody and control of John Morse and Yuba River Charter that relate to Waldorf education
28 and Rudolf Steiner, which are incorporated herein by reference.

1 In addition, plaintiff identifies the following documents, which have been previously provided:
2 Bob Anderson's Report re Anthroposophy and Waldorf Education, dated January 23, 1999
3 "Learning that Grows with the Learner: An Introduction to Waldorf Education"
4 Foundation Year Book List 1993-1994
5 Teacher Education Book List 1993-1994
6 Notes of Crystal Tilton Olson, Ed.D.
7 "Anthroposophy and Waldorf Education"
8 "Waldorf Parenting Handbook," Lois Cusick
9 Anthroposophical Press, Complete Catalog
10 "The Interpretation of Fairy Tales," Wilkinson
11 "Man and Animal," Roy Wilkinson
12 "The Education of the Child and Early Lectures on Education," Rudolf Steiner
13 "The Child's Changing Consciousness As the Basis of Pedagogical Practice," Rudolf Steiner
14 "Rudolf Steiner, Esoteric Christianity, and the New Age Movement," Roger E. Olson
15 "Waldorf Education and New Age Religious Consciousness"
16 "Lecture II"
17 Class notes of Kathleen Sutphen
18 "The Esoteric Basis of The Threefold Social Order and the Mission of Waldorf Education," Gary
19 Lamb
20 "Waldorf Education: Schooling the Head, Hands and Heart," Ronald E. Kotsch, Ph.D.
21 "Waldorf Education...An Introduction" by Henry Barnes
22 Rudolf Steiner College Program Offerings
23 "Anthroposophical Society, Fostering the Life of the Soul"
24 "Anthroposophy and the Waldorf Schools," p. 117
25 Anthroposophical Education, p. 283
26 What is Eurythmy, Rene M. Querido
27 "Rudolf Steiner's Curriculum for Waldorf Schools: An Attempt to summarize his indications: A
28 collection of quotations for the benefit of different Waldorf Schools."

1 "Lighting Fires (Inner Work for Teachers)," J. Smit

2 "The Esoteric Background of Waldorf Education, The Cosmic Christ Impulse," Rene M.

3 Querido.

4 In addition, plaintiff identifies the following responsive documents, which have not been
5 previously served:

6 The Spiritual Basis of Waldorf Education, The Waldorf School Approach, by Roy Wilkinson;

7 The Spirit of the Waldorf School, by Rudolph Steiner;

8 Steiner Education in Theory and Practice, by Gilbert Childs;

9 How to Know Higher Worlds - a *modern path of initiation*, Steiner

10 An Outline of Occult Science, Steiner

11 Theosophy, Steiner

12 The Archangel Michael - His Mission and Ours, Steiner

13 At the Gates of Spiritual Science, Steiner

14 Life Between Death and Rebirth, Steiner

15 Man and World in the Light of Anthroposophy, by Stewart Easton

16 Understanding the Human Being, Steiner (edited by Richard Sheldon)

17 The Philosophy of Freedom (also known as The Philosophy of Spiritual Activity), Steiner

18 The Ahrimanic Deception, Steiner

19 Community Life, Inner Development, Sexuality, and the Spiritual Teacher, Steiner

20 Philosophy, Cosmology, and Religion, Steiner

21 Theosophia, by Arthur Versluis

22 From Jesus to Christ, Steiner

23 The Influence of Spiritual Beings on Man, Steiner

24 Reincarnation and Karma, Steiner

25 The Path to Birth, by Stanley Drake

26 World History in the Light of Anthroposophy, Steiner

1 The Bridge Between Universal Spirituality and the Physical Constitution of Man
2 Rudolph Steiner and the Founding of the New Mysteries, by Sergei O. Prokofieff
3 The Problem of Lefthandedness
4 Anthroposophical Leading Thoughts, Rudolf Steiner
5 How to Know Higher Worlds, a Modern Path of Initiation, Rudolf Steiner
6 Karmic Relationships, Esoteric Studies, Vol I, Rudolf Steiner
7 The Spiritual Hierarchies and the Physical World, Rudolf Steiner
8 Spiritual Beings in the Heavenly Bodies & in the Kingdoms of Nature, Rudolf Steiner
9 An Outline of Esoteric Science, Rudolf Steiner

10 DOCUMENT REQUEST NO. 2:

11 Any and all documents which evidence, support, relate or refer to your responses to the Request
12 for Admissions served concurrently herewith.

13 ANSWER:

14 Each document identified by defendants in their response to interrogatories relating to books that
15 are in the custody and control of John Morse and Yuba River Charter that relate to Waldorf education
16 and Rudolf Steiner, which are incorporated herein by reference.

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"The Child's Changing Consciousness As the Basis of Pedagogical Practice," Rudolf Steiner

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26 Theosophy, Steiner
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28 The Archangel Michael - His Mission and Ours, Steiner

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- An Outline of Esoteric Science, Rudolf Steiner

Dated: March 31, 2004

LAW OFFICES OF SCOTT M. KENDALL



SCOTT M. KENDALL,
Attorney for Plaintiff PLANS, Inc.

PLANS, Inc. v. Sacramento Unified School District, et al.
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 8788 Elk Grove Blvd., Building One, Suite I, Elk Grove, CA 95624

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

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

on the parties involved addressed as follows:

Michelle L. Cannon
GIRARD & VINSON
1006 Fourth Street, Eighth Floor
Sacramento, CA 95814-3326

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 31, 2004**, 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.

KELLY SCROGGIN