

**IN THE CHANCERY COURT FOR THE TWENTY-FIRST JUDICIAL DISTRICT
OF TENNESSEE
AT FRANKLIN**

PARENTS' CHOICE TENNESSEE;)
PATRICIA J. LUCENTE and JAMES)
LUCENTE,)
)
)
Plaintiffs,) **Case No. 22cv-51642**
)
-vs-)
)
JASON GOLDEN, in his official)
capacity as SUPERINTENDENT OF)
WILLIAMSON COUNTY SCHOOLS;)
DAVE ALLEN, in his official capacity)
as ASSISTANT SUPERINTENDENT)
OF TEACHING ASSESSMENT;)
PENNY SCHWINN, in her official)
capacity as COMMISSIONER OF)
EDUCATION; and the)
WILLIAMSON COUNTY BOARD OF)
EDUCATION;)
)
Defendants.)

AFFIDAVIT OF PATRICIA JANE LUCENTE

Comes now the Affiant, Patricia Jane Lucente, and being first duly sworn, does hereby depose and say as follows:

1. I am an adult citizen and resident of Williamson County, Tennessee, and do make this affidavit based on my own personal knowledge.
2. I attest that the materials attached hereto are true and accurate copies of excerpts from Great Minds and the Wit & Wisdom Curriculum.
3. The log-in information for the Wit & Wisdom online Teacher's Manuals were obtained through various Freedom of Information Act (FOIA) requests.

4. All of the materials attached as a Collective Exhibit to this Affidavit come directly from Tennessee Online Teacher's Manuals that are currently being utilized by Williamson County Schools.
5. I affirm these matters to be true of my personal knowledge and, if called to do so, could and would competently testify thereto.


Further affiant saith naught.


PATRICIA JANE LUCENTE

STATE OF TENNESSEE)
COUNTY OF WILLIAMSON)

Personally appeared before me, Valerie Rosenbalm, a Notary Public in and for said County and State, the above-signed PATRICIA JANE LUCENTE, and did make oath that the information contained in the foregoing document was true and correct to the best of her information, knowledge and belief.

Sworn to and subscribed before me this 6th day of July, 2022.


Notary Public

My commission expires: 5/31/2023



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of July, 2022, a true and exact copy of the foregoing Affidavit of Patricia Jane Lucente was served upon the person(s) listed below:

Jason Golden
Official capacity as Superintendent of Williamson County Schools
1320 W. Main Street
Franklin, TN 37064

Dave Allen
Official capacity as Assistant Superintendent of teaching, Learning and Assessment
1320 W. Main Street
Franklin, TN 37064

Penny Schwinn
Official capacity as Commissioner of Education
710 James Robertson Parkway
Nashville, TN 37243

Williamson County Board of Education
c/o Jason Golden
1320 W. Main Street
Franklin, TN 37064

By the method(s) identified as follows:

- U.S. Mail, Postage Prepaid
- Hand-Delivery
- Overnight Delivery Service
- Certified Mail, Return Receipt Requested
- Email

/s/ Larry L. Crain
Larry L. Crain