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d/b/a Jefferson Academy of Advanced Learning

BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS

STATE OF ARIZONA

In the matter of, **FOUNDING FATHERS ACADEMIES, INC.**, a non-profit corporation, in the operation of **JEFFERSON ACADEMY OF ADVANCED LEARNING**, a charter school	No. 14F-FSRV-002-BCS **MOTION FOR ADDITIONAL WITNESS TO APPEAR TELEPHONICALLY** Before: Hon. Administrative Law Judge Tammy L. Eigenheer

COMES NOW FOUNDING FATHERS ACADEMIES, INC., an Arizona non-profit corporation, d/b/a Jefferson Academy of Advanced Learning by and through the undersigned counsel hereby moves the Court allow the following witness to appear telephonically and states as follows:

1. Founding Fathers Academies, Inc. is the party against whom the hearing has been initiated.
2. Founding Fathers Academies, Inc. requests that the following named witness be allowed to appear at the hearing set for March 26, 27 and 28 by telephone:
   a. Joey Reidhead
3. Mr. Riedhead is the Special Education Director as well as a secondary teacher at Jefferson Academy.

4. Mr. Reidhead had to undergo hip replacement surgery in early March and is not physically able to make an in-person appearance. The three hour drive from Show Low to Phoenix would be overly burdensome and taxing at this stage in his recovery.

5. Mr. Reidhead has unique knowledge regarding the secondary education at Jefferson Academy. As the primary teacher/administrator at the secondary level, Mr. Reidhead has knowledge regarding the A+ Curriculum, graduation requirements and assessment of the students which are at issue in this matter.

6. Ms. Anderson, attorney for the Arizona State Board of Charter Schools was notified of this additional request and stated that she had no objection to Mr. Reidhead testifying telephonically.

7. Founding Fathers Academies understands that it must place and pay for the telephone call and that the Court may not place the call to these witnesses.

Respectfully submitted this 20th day of March, 2014.

The Condos Law Office, PLC

/s/ Leonidas G. Condos
Leonidas G. Condos, Attorney for
Founding Fathers Academies, Inc. d/b/a
Jefferson Academy of Advanced Learning

COPY of the foregoing document filed electronically
This 20th day of March, 2014 with:

Office of Administrative Hearings
1400 West Washington Street
Phoenix, Arizona 85007
http://www.azoah.com

COPY of the foregoing document mailed electronically and/or via regular mail this 20th day of March , 2014 to:

DeAnna Rowe
Executive Director
Arizona State Board for Charter Schools
deanna.rowe@asbcs.az.gov

Kim S. Anderson, Esq.
Attorney General's Office
kim.anderson@azag.gov

By: /s/ Leonidas G. Condos