

**Exhibit 15**

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IN THE CIRCUIT COURT  
FOR BALTIMORE CITY

QUYAISHA COLES, Minor,	)	
by Her Mother and Next Friend,	)	
VERONICA SCOTT,	)	
Plaintiff,	)	Case No.
v.	)	24C01004337
KENNEDY KRIEGER INSTITUTE, INC.,	)	
et al.,	)	
Defendants.	)	

DEPOSITION OF CLARK H. McNUTT  
Taken in behalf of the Plaintiff

October 8, 2003

VOLUME I

\* \* \*

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1 contract into the TLC contract.  
 2 Q. Okay. What was ERI's, I guess, job, for lack  
 3 of a better word, to be with the TLC contract?  
 4 A. Our job was to perform the work that was in the  
 5 written specifications.  
 6 Q. Who composed the written specifications?  
 7 MS. IVERSON: Wait a minute. As to what  
 8 house? What are you talking about?  
 9 BY MR. KAZMIERCZAK:  
 10 Q. Well --  
 11 MS. IVERSON: I object to the form of the  
 12 question because I don't think it's clear.  
 13 It's very vague.  
 14 MR. KAZMIERCZAK: Okay.  
 15 THE WITNESS: They were field notes. The  
 16 TLC contract used the same specifications as  
 17 the repair and maintenance contract. And they  
 18 were actually set up as macros with the  
 19 abbreviations for those different treatment  
 20 options.  
 21 And so what we would do is we receive field  
 22 notes that were delineated by per room or area  
 23 in a particular property, with those treatment  
 24 option codes, which were directly tied to the  
 25 written out specifications.

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1 MS. IVERSON: Frank, there is an entire  
 2 packet of information that is kind of a  
 3 hodgepodge of different things.  
 4 The first page is receipt and  
 5 acknowledgment for cleaning kit and lead  
 6 education from the city of Baltimore signed by  
 7 Veronica Scott on November 7, 1995.  
 8 Then there are some TLC documents. The  
 9 first one is the form HOMELOG.O2, a home  
 10 assessment log. There's one -- actually, I'm  
 11 not sure if this is part of the same thing.  
 12 That's one page.  
 13 Then there are some notes that may be part  
 14 of that, one, two, three, four, five, six, or  
 15 seven pages of that.  
 16 And then there's the diagram of the house  
 17 at 911 North Collington, dated 10/13/95, and  
 18 that's three pages long.  
 19 And then there is an environmental  
 20 eligibility review form from September 20,  
 21 1995.  
 22 And then there's a housing status form  
 23 from -- I'm not sure which date it is, but it  
 24 has loan written up at the top of it for 911  
 25 North Collington.

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1 So we would take those field notes and we  
 2 would compose a written specification for that  
 3 property. And those notes came from  
 4 Kennedy Krieger.  
 5 BY MR. KAZMIERCZAK:  
 6 Q. I'll show you a document we're marking as  
 7 Exhibit No. 2.  
 8 (Exhibit marked for identification: 2.)  
 9 BY MR. KAZMIERCZAK:  
 10 Q. If you can take a look at this packet of  
 11 papers --  
 12 MS. IVERSON: May I see it before he  
 13 answers questions about it?  
 14 MR. KAZMIERCZAK: Sure, absolutely.  
 15 For the record, those are documents  
 16 provided, I believe, by your client through  
 17 discovery.  
 18 MS. IVERSON: It's a very lengthy number of  
 19 pages. Are you marking the entire --  
 20 MR. KAZMIERCZAK: Yes.  
 21 MS. IVERSON: -- stapled packet as an  
 22 exhibit?  
 23 MR. KAZMIERCZAK: Yes.  
 24 MR. DAILY: What are we marking as an  
 25 exhibit?

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1 And then there is a unit cover sheet for  
 2 911 North Collington.  
 3 And then there are the pages that I suspect  
 4 Mr. Kazmierczak is going to be asking  
 5 Mr. McNutt about, which is 1, 2, 3, 4, 5, 6, 7,  
 6 8, 9, 10 --  
 7 MR. DAILY: Thank you, Kelly. Thank you  
 8 guys.  
 9 MS. IVERSON: I'm going to put this on the  
 10 record since I'm almost through it. I think I  
 11 counted 13 pages for that. And --  
 12 MR. KAZMIERCZAK: Did you get all of that,  
 13 Frank?  
 14 MR. DAILY: I did. Thank you, John.  
 15 MS. IVERSON: The housing status form is  
 16 repeats of the other one.  
 17 The entire thing is going to be marked as  
 18 an exhibit. Perhaps just for ease of reference  
 19 we can number the pages, so when he's referring  
 20 to the page we can have a page number on it,  
 21 since there's so many?  
 22 MR. KAZMIERCZAK: Sure. If you want to  
 23 take a second I'll just put numbers on them, if  
 24 that's okay with you?  
 25 MS. IVERSON: That's great, thanks.