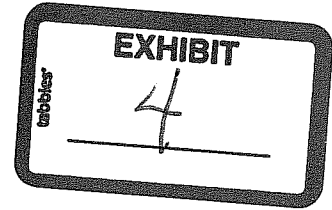


1 DISTRICT COURT, DENVER COUNTY
STATE OF COLORADO

2 1437 Bannock Street
3 Denver, Colorado 80202



4 FRIENDS OF DENVER PARKS, INC., a
Colorado non-profit corporation;
5 and STEVE WALDSTEIN, an
individual; ZELDA HAWKINS, an
6 individual; MEMBERS OF THE
PETITIONERS COMMITTEE TO REPEAL
7 DENVER ORDINANCE 170, consisting
of JOHN CASE, JUDITH M. CASE,
8 RENEE LEWIS, DAVID HILL and
SHAWN SMITH,

9 Plaintiffs,

10 v.

11 CITY & COUNTY OF DENVER, a
municipal corporation; and
12 SCHOOL DISTRICT NO. 1 IN THE
CITY AND COUNTY OF DENVER, a
13 public entity; and DEBRA
JOHNSON, in her capacity as
14 clerk and recorder of the City
and County of Denver.

15 Defendants.

16
17 On behalf of Plaintiffs:
JOHN CASE, ESQ., Atty Reg # 2431
18 BENSON & CASE, LLP
1660 So. Albion Street, Suite 1100
19 Denver, Colorado 80222
Phone Number: 303-757-8300
20 Facsimile: 303-753-0444
E-mail: case@bensoncase.com

Case No.
2013CV032444
Courtroom: 376

21
22 VIDEOTAPED 30(b)(6) DEPOSITION OF
SCHOOL DISTRICT NO. 1 IN THE
23 CITY AND COUNTY OF DENVER
through
24 ANDREW BURNSIDE ROBINSON
March 27, 2014
25

1 not be getting my dates correct. I know there was a
2 community process at some point that was put out there.

3 Q. Well, the information we've developed is that
4 the public was first notified in October of 2012 about
5 the contemplated land swap. Do you have different
6 information?

7 A. No.

8 Q. So why did DPS and the City wait until the
9 fall of 2012 to get public input on this transaction?

10 A. We were negotiating our agreement.

11 Q. Was there some sort of memorandum of
12 understanding that was created?

13 A. There was.

14 Q. And was that in December of 2011?

15 A. I think it was in 2012 that got finalized.

16 Q. Was it signed?

17 A. Yes. I believe you have it.

18 Q. You're saying there's a signed memorandum of
19 understanding?

20 A. Yes.

21 Q. And what's the date on it, if you know?

22 A. I don't know. Do you have it? I could look
23 at the date.

24 Q. I have seen an unsigned one that's dated
25 December of 2011.