

IN THE UNITED STATES DISTRICT COURT IN THE DISTRICT OF KANSAS,
AT KANSAS CITY, KANSAS

KENNETH SNYDER,)
)
Plaintiff,)
vs.)
)
WILLIAM JOHNSON, individually;)
ERIC CLARK, individually; and)
UNITED GOVERNMENT OF WYANDOTTE)
COUNTY/ KANSAS CITY d/b/a BOARD OF)
PUBLIC UTILITIES,)
)
Defendants.)
_____)

Case No. 12-CV-2723 JAR/DJW

**DEFENDANT UNIFIED GOVERNMENT OF WYANDOTTE COUNTY/KANSAS
CITY D/B/A BOARD OF PUBLIC UTILITIES' ANSWERS TO PLAINTIFF'S
REQUEST FOR ADMISSIONS**

1. Admit that Plaintiff had obligations to the Air National Guard during his employment with BPU.

ADMIT X DENY _____

It is Defendant's belief and understanding that, during his employment with the Defendant, Plaintiff had obligations to the U.S. Air National Guard.

2. Admit that Kenneth Snyder was employed by BPU from January 21, 2010 through July 8, 2010.

ADMIT X DENY _____

3. Admit that during 2010, BPU was and is an employer for the purposes of 38 U.S.C. § 4303(4)(A).

ADMIT X DENY _____

Defendant Unified Government of Wyandotte County/Kansas City, Kansas d/b/a/ Board of Public Utilities (“Defendant”) admits that from January 21, 2010 through July 8, 2010, Defendant was an employer of Plaintiff as defined in 38 U.S.C. § 4303(4)(A).

4. Admit that Plaintiff is a qualified employee and a member of the uniformed services for the purposes of 38 U.S.C. § 4303(3), (9), and (16).

ADMIT X DENY _____

Defendant admits that Plaintiff was an employee of Defendant as defined 38 U.S.C. § 4303(3) from January 21, 2010 through July 8, 2010. Defendant further admits that, during his employment with Defendant, Plaintiff was a member of the “uniformed services” as defined in 38 U.S.C. § 4303(16). Defendant also admits that, during his employment with the Defendant, Plaintiff was “qualified” as defined in 38 U.S.C. § 4303(9).

5. Admit that Plaintiff is a member of the U.S. Air National Guard.

ADMIT X DENY _____

It is Defendant’s belief and understanding that, during his employment with the Defendant, Plaintiff was a member of the U.S. Air National Guard.

6. Admit that Plaintiff’s Performance Evaluation dated March 26, 2010 was presented to Plaintiff on April 27, 2010.

ADMIT X DENY _____

7. Admit that Plaintiff’s Performance Evaluation dated April 27, 2010 was presented to Plaintiff on April 27, 2010.

ADMIT X DENY _____

8. Admit that Plaintiff’s Performance Evaluation dated June 21, 2010 was not presented to Plaintiff.

ADMIT _____ DENY X

9. Admit that Plaintiff did not receive a performance evaluation for the month of May 2010.

ADMIT X DENY _____

10. Admit that the reasons offered in Paragraph 45 of BPU's Answer (Court Doc. 13) are the only reasons for Plaintiff's termination.

ADMIT X DENY _____

11. Admit that Plaintiff's unit (190ARW) was called to active duty from November 10, 2009 through January 19, 2010.

ADMIT X DENY _____

It is Defendant's belief and understanding that the allegations set forth in request 11 are true.

12. Admit that Plaintiff was terminated within 180 days of the end of his active military service.

ADMIT X DENY _____

Respectfully submitted,

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26th day of April 2013, the foregoing was sent via e-mail and placed in the United States mail, first class postage prepaid, and addressed to the following:

Luanne Leeds
LEEDS LAW, LLC
515 SW Horne Street, Ste. 201
Topeka, KS 66606
leedslua@gmail.com
Attorney for Plaintiff

A handwritten signature in black ink, appearing to be 'Luanne Leeds', is written over a horizontal line.