

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHIRAN CANEL,

Plaintiff,

v.

SCHOOL OF THE ART INSTITUTE OF  
CHICAGO, and SANDIE YI,

Defendants.

Case No. 23 cv 17064

Judge Maldonado

**PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Plaintiff Shiran Canel (“Shiran”), through her attorneys, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure requests that Defendants answer the following interrogatories under oath within a period of time to be set by the Court.

**INSTRUCTIONS**

A. As required by Rule 26(b)(5), if any information responsive to these interrogatories is withheld because of an asserted privilege, or for any other reason, state the reason and the precise privilege or protection being claimed so that the applicability of the privilege or justification for being withheld can be determined.

B. As required by Rule 26(e), these responses shall be seasonably supplemented whenever additional or corrective information becomes available which is responsive to these requests.

C. If, after exercising the due diligence necessary to secure full information, you are unable to answer any part of the following interrogatories in full, you should answer to the extent possible, specifying the reason(s) for the inability to answer the remainder.

D. The following rules of construction apply to these interrogatories:

a. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

b. The singular shall include the plural, the plural shall include the singular, and masculine pronouns shall include the feminine and the neutral.

### **DEFINITIONS**

A. “Shiran” means Plaintiff, Shiran Canel, and/or any of her representatives or agents.

B. “SAIC” refers to Defendant, School of the Art Institute of Chicago, and any of its current or former employees, agents, representatives, consultants, or other persons acting, or purporting to act, on its behalf.

C. “Yi” refers to Defendant Sandie Yi and any of her representatives or agents.

D. “You” means SAIC and/or Yi

E. “Complaint” means the complaint filed in the above-captioned matter.

F. “Communication” means and includes, without limitation, statements, discussions, negotiations, conversations, speeches, meetings, remarks, questions, answers, panel discussions, symposia, and every other manner of disclosure, transfer or exchange of information, whether written or oral. The term includes communications and statements which are face-to-face and those which are transmitted by media such as intercom, telephone, television, radio, mail, modem or electronic mail.

G. “Concerning” means relating to, referring to, referencing, reflecting, describing, discussing, evidencing, supporting, stating, mentioning, embodying, setting forth, commenting on, assessing, recording, constituting, comprising, touching upon, summarizing, identifying,

commenting on, reflecting, indicating, analyzing, pertaining to in any way, or having any logical or factual connection whatsoever to the subject matter in question.

H. “Documents” shall be interpreted in the broadest sense permissible under the federal rules and shall specifically include, but not necessarily be limited to, the following:

- a. E-mail communications
- b. Text messages
- c. Communications via Slack, Teams, or other similar chat software
- d. Information otherwise contained in an electronic or voice mail system;
- e. All computer-readable media, including but not limited to tapes, diskettes, hard drives, cards, cassettes, and all other electronic or mechanical devices which contain information;
- f. All originals, drafts, and copies that differ in any respect from the original, all marginal comments that appear on such documents, and all transcripts or recordings of such documents; and
- g. All attachments, enclosures, or documents affixed or referred to in such documents.

I. “Identify” means:

- a. when used in reference to a document, to provide sufficient information to enable the Defendants to subpoena the document, including but not limited to providing the nature of the document, title, subject matter, date of creation, name of his author or person signing it, recipient, and the name and address of his present custodian if someone other than the Plaintiff.
- b. when used in reference to a natural person, to state each of the following in addition to specific information requested by the interrogatory: full name, present home and business addresses, electronic mail address, and present business, home telephone and mobile phone numbers.
- c. when used in reference to communications, to state the date of the communication, the method, the parties to the communication, the location of the communication, and the substance of the communication.

### **INTERROGATORIES**

1. Describe all steps taken by You to address concerns raised by Shiran regarding antisemitism, anti-Israeli conduct, discrimination, and/or harassment.

2. Describe all steps taken by You to address concerns raised by Shiran regarding Yi,

Yi's treatment of Shiran, Yi's classroom environment, and/or Yi's assignments in courses in which Shiran was enrolled.

3. Identify all communications regarding the concerns raised by Shiran regarding antisemitism, anti-Israeli conduct, discrimination, and/or harassment.

4. Why did SAIC cancel classes scheduled to be taught by Yi or Savneet Tarwal for the academic period beginning in January 2024, and identify all communications relating to those decisions.

**SHIRAN CANEL**

By: /s/Steven P. Blonder  
One of her attorneys

Steven P. Blonder (6215773)  
Joanne A. Sarasin (6191817)  
Laura A. Elkayam (6303237)  
**MUCH SHELIST, P.C.**  
191 N. Wacker Drive, Suite 1800  
Chicago, Illinois 60606  
(312) 521-2402  
sblonder@muchlaw.com  
jsarasin@muchlaw.com  
lelkayam@muchlaw.com

Avraham E. Aizenman  
**STEELMAN ADVOCATE, P.C.**  
3840 Via De La Valle  
Del Mar, CA 92014  
(424) 242-4603  
eli@steelmanadvocate.com  
(to be admitted pro hac vice)