

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

DELAWAREANS FOR)
EDUCATIONAL OPPORTUNITY)
and NAACP DELAWARE STATE)
CONFERENCE OF BRANCHES,)

Plaintiffs,)

v.)

C.A. No. 2018-0029-JTL)

JOHN CARNEY, SUSAN BUNTING,)
KENNETH A. SIMPLER, SUSAN)
DURHAM, BRIAN MAXWELL, and)
GINA JENNINGS,)

Defendants.)

**CHART AND COMPENDIUM OF DEFINITIONS
FILED IN SUPPORT OF THE REPLY BRIEF
IN FURTHER SUPPORT OF
THE STATE DEFENDANTS' MOTION TO DISMISS**

Barry M. Willoughby (No. 1016)
Kathaleen St. J. McCormick (No. 4579)
Lauren E.M. Russell (No. 5366)
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Dated: July 18, 2018

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TAB	YEAR	DICTIONARY	ADJECTIVAL DEFINITION
1	1828	Noah Webster, LL.D., <i>An American Dictionary of the English Language</i> (1828)	Causing effects; producing; that causes any thing to be what it is. The efficient cause is that which produces; the final cause is that for which it is produced.
2	1834	Noah Webster, LL.D., <i>A Dictionary for Primary Schools</i> 96 (1834)	that produces
3	1839	Noah Webster, LL.D., <i>An American Dictionary of the English Language</i> 266 (1839)	Causing effects; producing; that causes any thing to be what it is.
4	1844	Noah Webster, LL.D., <i>An American Dictionary of the English Language</i> 286 (1844)	Causing effects; producing; that causes any thing to be what it is.
5	1848	Noah Webster, LL.D., <i>An American Dictionary of the English Language</i> 340 (1848)	Causing effects; producing; that causes any thing to be what it is.
6	1857	Noah Webster, LL.D., Chauncey A. Goodrich, <i>An American Dictionary of the English Language</i> (1857).	Causing effects; producing; that causes any thing to be what it is. The <i>efficient</i> cause is that which produces; the <i>final</i> cause is that for which it is produced.
7	1857	Noah Webster, LL.D., William G. Webster, <i>A Primary School Pronouncing Dictionary of the English Language</i> 89 (1857).	that produces effect
8	1861	Noah Webster, LL.D., Chauncey A. Goodrich, <i>An American Dictionary of the English Language</i> (1861)	Causing effects; producing; that causes any thing to be what it is. The <i>efficient</i> cause is that which produces; the <i>final</i> cause is that for which it is produced.
9	1865	Noah Webster, LL.D., Chauncey A. Goodrich, <i>An American Dictionary of the English Language</i> 430 (1865)	Causing effects; producing results; actively operative; not inactive, slack, or incapable; characterized by energetic and useful activity.
10	1874	Noah Webster, LL.D., William G. Webster, William A. Wheeler, <i>Academic Edition: A Dictionary of the English Language</i> 138 (1874)	Causing effects.
11	1878	Noah Webster, LL.D., William G. Webster, William A. Wheeler, <i>Academic Edition: A Dictionary of the English Language</i> 138 (1874)	Causing effects.
12	1880	Noah Webster, LL.D., William G. Webster, William A. Wheeler, <i>Primary School Dictionary of the English Language</i> 96 (1880)	Producing effect.

TAB	YEAR	DICTIONARY	ADJECTIVAL DEFINITION
13	1881	Rev. James Stormonth, <i>Etymological and Pronouncing Dictionary of the English Language</i> 171 (1881)	Producing effects; able; competent; material
14	1892	<i>Webster's Primary School Dictionary: A Dictionary of the English Language: Designed for Use in Primary Schools</i> 86 (1892)	Causing effects; able.
15	1892	<i>Websters High School Dictionary: A Dictionary of the English Language: Designed for Use in High Schools</i> 132 (1892)	Causing effects; producing results; effectual; competent; able.
16	1894	<i>A Standard Dictionary of the English Language</i> 377 (1894)	1. Acting or having power to act effectually; having all the energy or power requisite; competent; as, an <i>efficient</i> helper; an <i>efficient</i> leader. 2. Having or exercising the power to produce effects or results; actively causative.
17	1895	William Dwight Whitney, Ph.D., LL.D., <i>The Century Dictionary: An Encyclopedic Lexicon of the English Language</i> (Vol. 3) 1849 (New York, The Century Co. 1895).	1. Producing outward effects; of a nature to produce a result; active; causative. 2. Acting or able to act with due effect; adequate in performance; bringing to bear the requisite knowledge, skill, and industry; capable; competent: as, an <i>efficient</i> workman, director, or commander.
18	1895	<i>Webster's Academic Dictionary, Dictionary of the English Language</i> 189 (1895)	Causing effects; actively operative.
19	1897	Robert Hunter, <i>The American Encyclopaedic Dictionary</i> (Vol. 4) 1599 (1897)	1. Causing or producing effects or results; acting as the cause of effects; effective. 2. Having acquired a competent knowledge of or acquaintance with any art, practice, or duty; competent, capable.
20	1898	Robert Hunter, Charles Morris, <i>The New National Dictionary, Encyclopedia and Atlas</i> (Vol. 6) 1817 (Belford, Middlebrook & Co. 1898)	1. Causing or producing effects or results; acting as the cause of effects; effective. 2. Having acquired a competent knowledge of or acquaintance with any art, practice or duty; competent, capable.
21	1898	<i>Webster's Collegiate Dictionary: A Dictionary of the English Language</i> 283 (1898)	Causing effects; producing results; actively operative or capable.
22	1907	Noah Porter, D.D., LL.D., <i>Webster's International Dictionary of the English Language</i> 472 (1907)	Causing effects; producing results; that makes the effect to be what it is; actively operative; not inactive, slack, or incapable; characterized by energetic and useful activity; as, an <i>efficient</i> officer, power.
23	1911	<i>A Modern Dictionary of the English Language</i> 156 (1911)	Capable of producing a desired result; not inactive or incapable; energetic and active.

TAB	YEAR	DICTIONARY	ADJECTIVAL DEFINITION
24	1912	H.W. Fowler & F.G. Fowler, <i>The Concise Oxford Dictionary of Current English</i> 262 (1912)	Productive of effect; (of persons) competent, capable; <i>e.cause</i> , that which makes a thing what it is.
25	1919	<i>Webster's Collegiate Dictionary</i> 321 (1919)	1. Serving as, or characteristic of, the working or moving cause; causative; operant; as, the <i>efficient</i> action of heat. 2. Characterized by energetic and useful activity; as, an <i>efficient</i> officer.
26	1922	Robert Arrowsmith, Ph.D., <i>Webster's New Modern English Dictionary</i> 282 (1922)	Producing or causing effects or results; powerful; ready
27	1934	<i>Webster's New International Dictionary</i> (1934)	1. Serving as, or characteristic of, the efficient cause 2. Characterized by effective activity; not inactive, slack, or incapable
28	1936	William Little, <i>The Shorter Oxford English Dictionary on Historical Principles</i> 586 (1936)	1. Making, causing to be: that makes (a thing) to be what it is. 2. Productive of effects, operative. Of persons, Adequately skilled and active.
29	1947	<i>The Merriam-Webster Pocket Dictionary</i> 114 (1947)	Characterized by effective activity; capable; competent.
30	1953	<i>Webster's New Collegiate Dictionary</i> 262 (1953)	1. Immediately effecting; as the efficient cause; hence, effective in causing or producing; as, efficient action. 2. Highly capable or productive; effective in operation, as efficient workers.
31	1959	William Geddie, M.A., B.Sc., <i>Chambers's Twentieth Century Dictionary</i> 336 (1959)	Capable of doing what may be required: effective.
32	1964	<i>The New Merriam-Webster Pocket Dictionary</i> 157 (1964)	Productive of desired effects esp. without loss or waste: competent
33	1964	H.W. Fowler & F.G. Fowler, <i>The Concise Oxford Dictionary of Current English</i> 389 (1964)	Productive of effect: (of persons) competent, capable: cause, that which makes a thing what it is.

TAB	YEAR	DICTIONARY	ADJECTIVAL DEFINITION
34	1966	<i>Webster's Third New International Dictionary</i> (Vol. 1) 725 (1966)	<p>1. Serving as or characteristic of an efficient cause: causally productive: operant.</p> <p>2. Marked by ability to choose and use the most effective and least wasteful means of doing a task or accomplishing a purpose: competent.</p> <p>3. Marked by qualities, characteristics, or equipment that facilitate the serving of a purpose or the performance of a task in the best possible manner: eminently satisfactory in use: effective to an end.</p>
35	1969	A M Macdonald OBE BA (Oxon), <i>Chambers Compact Dictionary</i> 157 (1969)	(of a person) - capable, skilful: satisfactory in use: very practical (e.g. an efficient method).
36	1974	<i>The Merriam-Webster Dictionary</i> 232 (1974)	Productive of desired effects esp. without loss or waste: competent
37	1976	<i>Webster's Seventh New Collegiate Dictionary</i> 264 (1976)	<p>1 : immediately effecting</p> <p>2 : productive of desired effects esp: productive without waste</p>
38	1976	<i>Webster's New World Dictionary, Second College Edition</i> 445 (1976)	<p>1. directly producing an effect or results; causative; effective/the <i>efficient</i> cause/</p> <p>2. producing a desired effect, product, etc. with a minimum of effort, expense, or waste; working well</p>
39	1980	Eugene Ehrlich, et al., <i>Oxford American Dictionary</i> 275 (1980)	Acting effectively, producing results with little waste of effort.
40	1988	George Davidson & Anne Seaton, <i>Chambers Pocket Dictionary</i> 229 (1988)	<p>1 (of a person) capable, skillful</p> <p>2 satisfactory in use</p> <p>3 very practica.</p>
41	1989	J.A. Simpson & E.S.C. Weiner, <i>The Oxford English Dictionary</i> (Vol. V) 84 (1989)	<p>1. Making, causing to be; that makes (a thing) to be what it is; chiefly in connection with <i>cause</i>.</p> <p>2. Productive of effects; effective; adequately operative. Of persons: Adequately skilled.</p>
42	1989	<i>Webster's Encyclopedic Unabridged Dictionary of the English Language</i> 455 (1989)	<p>1. performing or functioning in the best possible and least wasteful manner; having and using requisite knowledge, skill, and industry; competent; capable</p> <p>2. satisfactory and economical to use</p> <p>3. producing an effect as a cause; causative</p>
43	1993	<i>Random House Webster's Dictionary</i> 208 (1993)	Performing or functioning effectively with the least waste of time, effort or resources.

TAB	YEAR	DICTIONARY	ADJECTIVAL DEFINITION
44	2004	Catherine Soanes & Angus Stevenson, <i>Electronic Pocket Oxford English Dictionary</i> (2004).	working productively with minimum wasted effort or expense. preventing the wasteful use of a resource: an enenergy-efficient heating system.
45	2005	<i>Oxford Dictionary of American English</i> (2005)	Able to work well without making mistakes or wasting time and energy
46	2014	<i>Merriam-Webster's Collegiate Dictionary</i> 397 (2014)	1 : being or involving the immediate agent in producing an effect 2 : productive of desired effects: <i>esp</i> : productive without waste

CERTIFICATE OF SERVICE

I, Elisabeth S. Bradley, Esquire, do hereby certify that on July 18, 2018, I caused a copy of the foregoing document to be served on the following counsel in the manner indicated below:

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