

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

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PETER OPPEBEK
CLERK US DIST COURT
W.D OF WI

DR. SABINA BURTON,
Plaintiff,

v.

Case No. 14-CV-274

BOARD OF REGENTS UNIVERSITY OF
WISCONSIN, et al.,
Defendants.

DECLARATION OF SABINA BURTON – AUDIO, VIDEO EXHIBITS

Pursuant to 28 U.S.C. § 1746, Sabina L. Burton declares, as follows:

1. I am an adult resident of the State of Wisconsin, the Plaintiff in the above-named case, and I make this declaration based on personal knowledge.
2. Several months ago I provided the below listed audio and video files to my former attorneys and asked them to present the files as evidence in this case. A clerk of the court searched for the audio exhibits but was unable to find them.
3. Attached to this declaration is a DVD marked “Case no. 14-CV-274 Audio and Video exhibits, Burton v Board of Regents-UW, 4/11/16” which contains a true and correct copy of a video file that is hereby entered as an exhibit and marked as follows:
 - a. V1, Video of Dr. Burton’s lecture at a Faculty Forum on April 3, 2014. To view the video open the file: “V1 - Fac-Forum - Burton\VIDEO_TS VTS_01_1.vob”
4. Also contained on the attached DVD are true and correct copies of audio files, in mp3 and m4A format, that are hereby entered as exhibits and marked as follows:

- a. A1 - Meet-Liz-Jean-Sabina-1-29-13, an audio recording of a meeting with Burton Throop and Durr.
- b. A2 - Meet-Jean-2-7-13, an audio recording of a meeting on 2/7/13 with HR director Durr and Burton.
- c. A3 - Mediation Mike 6-27-14, an audio recording of the mediation meeting on 6/27/14 with Burton, Dalecki, DeCoste and Lohmann.
- d. A4 - DRB meeting - 1-14-14, an audio recording of a DRB meeting on 1/14/14.
- e. A5 - DRB meeting -10-15-13, an audio recording of a DRB meeting on 10/15/13.
- f. A6-CD I -Caywood grv 4-12-13, an audio recording of the first half of the grievance hearing on 4/12/13 where Burton brought charges against Caywood.
- g. A6-CD II -Caywood grv 4-12-13, an audio recording of the second half of the grievance hearing on 4/12/13 where Burton brought charges against Caywood.
- h. A7 - Meet Provost-8-8-13, an audio recording of a meeting between Provost Den Herder and Burton on 8/8/13.
- i. A8 - PhCall-Chancellor-7-11-13-a, an audio recording of a phone call from Chancellor Shields to Burton on 7/11/13.
- j. A9 - Chair Search meeting - 16min30sec, an audio recording of the chair search meeting on 9/24/14 with Dr. Burton, Dr. Solar, Dr. Stackman and Dr. Reed in attendance.
- k. A10 - Dept mtg throop -8-29-14, an audio recording of the first half of the department meeting on 8/29/14 which was conducted by Throop.
- l. A11 - dept mtg - Dalecki - 8-29-14, an audio recording of the second half of the department meeting on 8/29/14 which was conducted by Dalecki.

- m. A12 - Meet Jen n John 8-13-14, an audio recording of a meeting on 8/13/14 between Burton, DeCoste and Lohmann.
- n. A13 - 29-GrievanceMeeting-12-2-13, an audio recording of the grievance hearing on 12/2/13 where Burton brought charges against Throop.
- o. A14 - Gibsons hearing-3-24-14, an audio recording of the hearing on 3/24/14.
- p. A15 - Meet Throop - Sauke-Burton-10-15-14, an audio recording of a meeting between Burton, Throop and Zauke on 10/15/14.
- q. A16 - Chair Sch Mtg - 12-5-14, an audio recording of a chair search meeting on 12/5/14.
- r. A17 - CRST mtg some time in Oct 2014, an audio recording of a CRST meeting in October, 2014.
- s. A24 - Mtg w John Lohman-10-31-14, an audio recording of a meeting between Burton and Lohmann on 10/31/14.
- t. A28 - Dalecki threatens Grad Student, an audio recording of the discussion in late November, 2014 where Dalecki called grad student Jacobus into his office.
- u. A29a - Grv Hrg Proc - Fac Sen Mtg - 12-9-14, an audio recording clip of the discussion about the new Grievance Hearing Procedures at a Faculty Senate Meeting on 12/9/14.
- v. A30 - Mtg w Lohmann 1-15-15, an audio recording of a meeting with Burton, her husband Roger Burton and Lohmann on 1/15/15.
- w. A31 - CJ dept mtg 12-16-14, an audio recording of the CJ department meeting on 12/16/14.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2016

A handwritten signature in black ink, appearing to read "Sabina Burton". The signature is written in a cursive style with a horizontal line underneath it.

Sabina Burton, Plaintiff
5768 Maple Glen Lane,
Platteville, WI 53818
Email: sabinaburton@live.com