

1 allegations.

2 Did you do anything to investigate the

3 validity of Dr. Burton's complaints?

4 A Dr. Burton provided absolutely no evidence of any

5 retaliation.

6 Q Did you investigate at all?

7 A Not after the first one.

8 Q Do you recall that upon receiving similar complaints,

9 Ms. Durr sent Dr. Caywood an e-mail stating that

10 Sabina had acted quite appropriately?

11 A I'd have to see it in front of me.

12 Q You don't recall that?

13 A Only vaguely.

14 Q Dr. Burton complained again to Ms. Durr in November

15 about Caywood's continued bullying and harassment.

16 Do you know whether or not Ms. Durr

17 took any action after that complaint?

18 A I don't. I don't recall.

19 Q So December 10th, 2012, Dr. Burton sent to you an

20 e-mail complaining that Dr. Caywood was still

21 retaliating against her, specifically for her

22 participation in the student sexual harassment

23 complaint, and she cited as an example in her e-mail

24 his hostile attitude, his negative comments about her

25 participation in the student complaint during a

1 recent department meeting, his decision to assign

2 Dutelle the chair of search and screen committee that

3 had been vacated, for a position vacated by Lomax.

4 Do you recall receiving that e-mail?

5 A No.

6 MS. BENSKY: We have about an hour left.

7 MR. HAWKS: Mm-hmm.

8 BY MR. HAWKS:

9 Q Isn't it true that you asked Dr. Caywood to undergo

10 communication training and he refused?

11 A Yes. Shortly after that, within minutes, he chose to

12 step down from being a chair.

13 Q Okay. I'm going to play an audio tape again.

14 (Audio recording played.)

15 BY MR. HAWKS:

16 Q Okay. Do you recall that meeting? Does that refresh

17 your memory of a meeting between you and Dr. Burton

18 and Jeanne Durr about eight months after you started

19 your employment?

20 A I only vaguely remember that we had that meeting. I

21 am distressed to find that it was recorded as well.

22 Q Isn't it true that Dr. Burton, during the course of

23 that meeting, complained about Caywood's continuing

24 discrimination?

25 A She alleged that, yes.

1 Q And isn't it true that during that meeting she

2 complained about his retaliation?

3 A I don't recall.

4 Q Isn't it true that Chancellor Shields urged you to

5 assist the department by employing outside

6 consultants to work with the entire CJ department to

7 build a stronger team, work on communications and

8 conflict resolution skills, and begin to resolve some

9 of the conflict that was built up over time?

10 A Are you reading from a document?

11 Q My notes.

12 A My memory is, yes, that he asked the department to

13 engage in kind of team building and communication

14 skills and asked me to help them with that.

15 Q Did that ever happen?

16 A The department essentially refused, including

17 Dr. Caywood, I will say.

18 Q And there were other issues in the department that

19 were significant besides issues between Throop and

20 Caywood or Throop and Dalecki; would that be fair to

21 say?

22 A I'm Throop.

23 Q I'm sorry. It's getting late in the afternoon.

24 Between -- there were other issues in

25 the department other than the ones involving

1 Dr. Burton?

2 A There were, yes.

3 Q That were significant?

4 A Yes.

5 Q You mentioned the issue of Dutelle.

6 A Yes.

7 Q You've mentioned the issue with Gibson.

8 A Yes.

9 Q What other substantial issues were --

10 A Well, Gibson, not only the breach experiment issue,

11 but he had conducted no scholarship of any kind and

12 was generally a very difficult person with whom to

13 deal. So Gibson was very definitely an issue.

14 Q Significant turnover in the department?

15 A In Gibson's case, he was not retained by the

16 department.

17 Q But there was significant turnover leading to

18 staffing issues --

19 A There were some staffing issues, yes, and there was

20 some turnover as well, yes.

21 Q Right. And then there were two outside studies

22 conducted that criticized the department for

23 structural reasons; isn't that true?

24 A Largely, if my memory serves, the two consultants

25 were looking at the curriculum more than they were at