

Dr. Sabina Burton v. Board of Regents University of
Wisconsin, et al.

14-CV-274

Transcript of the Testimony of:

Valerie Stackman, Ph.D.

November 16, 2015



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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

= = = = =

DR. SABINA BURTON,
Plaintiff,

-vs-

Case No. 14-CV-274

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

= = = = =

Deposition of VALERIE STACKMAN, Ph.D.

Monday, November 16, 2015

3:24 p.m.

at

UNIVERSITY OF WISCONSIN-PLATTEVILLE
Ullsvik Hall
1 University Plaza
Platteville, Wisconsin

Reported By: Christal A. Hansen, CSR-IA/IL, RPR

1 DEPOSITION of VALERIE STACKMAN, Ph.D.,
2 called as a witness, taken at the instance of the
3 Plaintiff, under the provisions of Chapter 804 of
4 the Wisconsin Statutes, pursuant to Notice, before
5 Christal A. Hansen, a Registered Professional
6 Reporter and Notary Public in and for the State of
7 Wisconsin, at University of Wisconsin-Platteville,
8 Ullsvik Hall, 1 University Plaza, City of
9 Platteville, County of Grant, and State of
10 Wisconsin, on the 16th day of November 2015,
11 commencing at 3:24 p.m.

12
13 A P P E A R A N C E S

14 HAWKS QUINDEL, S.C., by
15 Mr. Timothy E. Hawks
16 222 East Erie Street, Suite 210
Milwaukee, Wisconsin 53201-0442
Appeared on behalf of Plaintiff.

17
18 WISCONSIN DEPARTMENT OF JUSTICE, by
Ms. Anne M. Bensky
19 P.O. Box 7857
Madison, Wisconsin 53707-7857
20 Appeared telephonically on behalf of
Defendants.

21
22 UNIVERSITY OF WISCONSIN SYSTEM, by
Ms. Jennifer Lattis
23 1802 Van Hise Hall
1220 Linden Drive
24 Madison, Wisconsin 53706
Appeared on behalf of Defendants.

25

1 I N D E X

2 WITNESS Page(s)

3 VALERIE STACKMAN, Ph.D.

4 Examination by Mr. Hawks 4

5 E X H I B I T S

6 No. Description Identified

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9 Exh. 102 Document entitled Tentative 58
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10 Exh. 103 E-mail exchanges between 59
11 Dr. Dalecki and Dr. Burton

12 Exh. 104 E-mail exchanges between 60
13 Dean Throop and Dr. Burton,
14 Dr. Banachowski-Fuller,
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15 Exh. 105 E-mail exchanges between 65
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19 Dr. Burton, Dr. Dalecki,
20 Mr. Rogus, Mr. Francis,
Ms. Burkholder, Ms. Anderson
and Ms. Elskamp

21 Exh. 108 E-mail exchanges between 70
22 Dr. Burton and Witness

* * * * *

23 (Attached to original transcript; copies
24 provided to counsel)
25 (Original transcript filed with Attorney Hawks)

1 VALERIE STACKMAN, Ph.D.
 2 called as a witness, after having been first
 3 duly sworn, was examined and testified as
 4 follows:

5 EXAMINATION

6 BY MR. HAWKS:

7 Q. Dr. Stackman, are you currently
 8 employed by the University of
 9 Wisconsin-Platteville in the Criminal Justice
 10 Department?

11 A. Yes.

12 Q. And do you hold a tenurable faculty
 13 position in the department?

14 A. Tenurable, yes.

15 Q. And what is your area of expertise?

16 A. I look at race disparities in the
 17 system, so race, class, and gender disparities
 18 in the CJ system. And I'm also a medical
 19 sociologist, so I look at many of the same
 20 things by health and illness.

21 Q. Did you begin your employment here?

22 A. My tenure track position started fall
 23 2014, but I was on some -- I don't know what
 24 they call them -- additional projects over the
 25 summer.

1 victimization, physical and sexual
 2 victimization.

3 Q. I'm accustomed to hearing about string
 4 theory in the context of physics, not criminal
 5 law.

6 A. Oh, yeah, yeah. No. Oh, strain. Not
 7 string.

8 Q. Strain?

9 A. Strain, yeah. No, not string. Sorry.

10 Q. When did you first meet Dr. Burton?

11 A. The first time I met her was the first
 12 time I applied for my tenure track position. I
 13 actually applied three years ago and didn't get
 14 the position. I should say three years before I
 15 got my current position. So, that must have
 16 been spring 2011. Actually, yes, it was. She
 17 was chair of that search at the time. And it
 18 was right around Super Bowl. Super Bowl Sunday
 19 was the day I flew in actually.

20 Q. How did you find her? How did you find
 21 her to be, friendly, unfriendly, helpful?

22 A. I was going to say, Well, she was
 23 attached to the position. Sorry. Yeah, she was
 24 very friendly, welcoming, supportive, which was
 25 nice. When somebody is interviewing for a

1 Q. The prior summer?

2 A. Yeah. June 2014 through September --
 3 through August 2014.

4 Q. Do you recall what those projects were?

5 A. Yeah. I helped out with the German
 6 students coming into town, that trip. Oh, I
 7 revised a course online, a graduate course on
 8 research methods and statistics. And I taught a
 9 course online, an Intro to Criminal Justice
 10 course online.

11 Q. Where were you employed previous to
 12 University of Wisconsin-Platteville?

13 A. I taught at the University of Pikeville
 14 in Pikeville, Kentucky, for three years.

15 Q. And prior to that?

16 A. I was in grad school.

17 Q. Where did you go to grad school?

18 A. Howard University in Washington, D.C.

19 Q. And what was your -- did you obtain a
 20 Ph.D. from Howard?

21 A. Yes.

22 Q. What was your Ph.D. dissertation on?

23 A. I was testing a criminological theory
 24 called general strain theory, and I was looking
 25 at incarcerated women and prior histories of

1 tenured track spot and is fairly far away in a
 2 different geographic climate, it's, it's nice to
 3 have somebody who makes you feel a little bit
 4 more at ease when you're on the search instead
 5 of always having to be very uptight.

6 Q. You were not successful in that
 7 application process at that time; is that
 8 correct?

9 A. Correct.

10 Q. But then you reapplied for the position
 11 to begin in 2014, fall; is that correct?

12 A. Yes.

13 Q. Who was on the search committee in --
 14 when did you go through the search for that
 15 position?

16 A. It may have started at the -- it may
 17 have started fall 2010, I would imagine. And
 18 then that would have been spring, February that
 19 spring of 2011, because that's the semester I
 20 graduated. What was the rest of the question?
 21 I'm sorry.

22 Q. My question was -- must not have been
 23 clear.

24 A. Sorry.

25 Q. When did you apply for the, the

1 position that you held in 2014?
 2 A. Here?
 3 Q. Yes.
 4 A. I didn't have -- oh, I get it now.
 5 Sorry. So, I applied for my current position
 6 that I started fall 2014, must have been August
 7 or September of 2013.
 8 Q. And was there a search committee
 9 established for that vacancy?
 10 A. Uh-huh. Yes.
 11 Q. And was Sabina Burton on that search
 12 committee?
 13 A. Yes. I believe she chaired it.
 14 Q. Did you find her to be helpful or
 15 unhelpful at that point?
 16 A. Same. Very helpful.
 17 Q. So, you began your employment summer
 18 '14. Let's go through the spring semester of
 19 2015. How did you find Dr. Burton to be in
 20 terms of collegial and supportive of your role?
 21 A. She was still -- she's always been
 22 supportive of me. In the summer of 2014 when
 23 she was no longer able to help out with the
 24 German students that came into town, she was sad
 25 to a certain degree going through her family

1 stuff, her family illnesses. In terms of what I
 2 saw, her behavior toward me didn't change a
 3 whole lot, though, during that time. Her
 4 interactions with other people, I would imagine,
 5 changed, but not necessarily with me.
 6 Q. When we go forward from -- that would
 7 have been the period of fall of 2014 through
 8 spring of 2015?
 9 A. Uh-huh.
 10 Q. And then from spring of 2015 to the
 11 present how would you describe your relationship
 12 with Dr. Burton?
 13 A. It's like it -- it's great. I was sick
 14 the last couple of days, and she's asked how
 15 I've been feeling and so...
 16 Q. Do you find her difficult to get along
 17 with?
 18 A. Do I, not necessarily. I think at this
 19 point I am aware that she sometimes sees
 20 situations differently than other people do.
 21 So, no, I don't find her difficult to get along
 22 with. She's been incredibly nice to me.
 23 Q. As you were about to begin your
 24 employment at UW-Platteville, do you recall
 25 contacting Sabina for advice as to what

1 committees you -- did you solicit an opinion
 2 from her as to what service committees you
 3 should be involved in here at UW-Platteville?
 4 A. Yes. There was an e-mail that came out
 5 from James Swensen. S-W-E-N-S-E-N maybe. He is
 6 the guy who assigns faculty to university
 7 committees. And I know part of my job is to
 8 provide service at different levels. So,
 9 university, college, department, community and
 10 profession. And so I had sought some advice on
 11 what committees to -- that would be good for my
 12 area of expertise, because many of them just had
 13 titles, and I knew nothing about them. So, yes.
 14 Q. So, at some point in time did you have
 15 a conversation with Dean Throop in which you
 16 mentioned to her that Dr. Burton had inquired
 17 about your interest in house sitting?
 18 A. When?
 19 Q. At any point in time.
 20 A. So, the question is, did Dean Throop
 21 and I ever have a conversation about Sabina's
 22 request for me to house sit?
 23 Q. Yes.
 24 A. Not primarily focused around that.
 25 Q. Any conversation at all? Did the

1 subject ever came up?
 2 A. We recently had a conversation a couple
 3 days ago when Jennifer first told me about the
 4 deposition, because I had no idea that I was
 5 involved in this at all. And so I went to see
 6 the dean to kind of ask for some ballpark
 7 understanding of what was going on so that I
 8 could try and figure out my location and my
 9 involvement in the process. And we did mention
 10 the house sitting at that point.
 11 Q. Well, let's break that down into its
 12 different parts then. You had a conversation
 13 with the dean --
 14 A. Uh-huh.
 15 Q. -- in which this subject came up a few
 16 days ago?
 17 A. Uh-huh. Yes.
 18 Q. And you initiated that conversation or
 19 you --
 20 A. With the dean?
 21 Q. You initiated the meeting?
 22 A. No.
 23 Q. She initiated that meeting?
 24 A. Uh-huh. Well, she invited me, if I was
 25 interested in talking, to set up a meeting with

1 her, and so I did. So, I guess, technically I
 2 would have initiated it then. I sent the
 3 meeting request.
 4 Q. But you began that by saying she
 5 invited you to file a request; is that -- or
 6 submit a request?
 7 A. She said if I was interested in talking
 8 to her, that she would be welcome -- that I
 9 would be welcome to schedule a meeting with her.
 10 Q. And did you have any communication with
 11 her about -- have interest in meeting with her
 12 prior to the time that she sent you that note or
 13 communicated that idea to you?
 14 A. No. That meeting came up because I had
 15 expressed some concern to Jennifer about my
 16 involvement, not being sure what my involvement
 17 was in this process. When I got the first
 18 e-mail saying that I was to be deposed in this,
 19 I expressed some concern to Jennifer about my
 20 involvement. And the dean was made aware of my
 21 concerns, and so the dean reached out to me to
 22 assure me.
 23 Q. Now, is that the first conversation
 24 that you can remember that you and the dean
 25 spoke about the house-sitting question?

1 A. It's the first conversation where it
 2 came up as a central concept. I may have talked
 3 to her about it the prior summer, but I don't
 4 recall a conversation with her prior to this
 5 one.
 6 Now, one may have happened, and it may
 7 have just slipped my mind, but meeting with the
 8 dean, for me, is always kind of a nerve-racking
 9 thing because she's the dean. So, I think
 10 nerves are kind of always involved.
 11 Q. So, let's go back to the summer of
 12 2014. And can you describe, as best as you can
 13 based upon your memory at this time, the way
 14 that conversation between you and Dr. Burton
 15 went with regard to house sitting.
 16 A. It must have happened very early in the
 17 summer. I haven't looked back to see what the
 18 date was. I know I had just moved into town.
 19 None of my belongings were in town at that
 20 point, I don't think. And she was leaving town
 21 to go see family. I don't recall if she was
 22 going to California or if she was going back to
 23 Germany.
 24 I know she wanted to take her
 25 daughters to see her mother who was sick, but I

1 don't remember if her mom was in Germany or in
 2 California. She just asked if I would be
 3 willing to watch the house, that I could play
 4 with her dogs and feed the horses, if I was
 5 interested, and that I was welcome to eat
 6 anything in -- I don't know if she told me that
 7 I could eat anything in the fridge. I would
 8 imagine that she probably would have said
 9 something to that regard, but I just remember
 10 she just asked if I would just house sit and --
 11 Q. And what did you say to her?
 12 A. Sure.
 13 Q. Did you, in fact, house sit?
 14 A. No.
 15 Q. Why not?
 16 A. I must have mentioned her request in
 17 passing to Mike Dalecki, and he suggested that
 18 that might not be a good thing for me to do
 19 given the power dynamic that was involved
 20 because she is a tenured faculty member and has
 21 a vote as to whether or not I get tenure in the
 22 department. And he just -- I don't know if it
 23 was at that conversation or another one shortly
 24 thereafter, but it was something to the extent
 25 of, if something had gone wrong at the house,

1 house had caught on fire or horse had gotten
 2 sick, that I could be held liable for that.
 3 And I don't think that I had really
 4 thought about that at all. The school where I
 5 came from was very close, and so we often did
 6 things for one another. I babysat one of my
 7 colleague's kids a couple nights. I've house
 8 sat. I went to one of my other colleague's
 9 houses, and we were working on a project at his
 10 house. So, I didn't think much of it.
 11 Q. Going from the point in time you had
 12 this conversation with Dr. Dalecki, going to an
 13 earlier point in time when you had the initial
 14 conversation with Dr. Burton about house
 15 sitting, were you uncomfortable in any way about
 16 the communication between you and Dr. Burton --
 17 A. No.
 18 Q. -- about house sitting?
 19 A. No.
 20 Q. After you had that conversation with
 21 Dr. Dalecki, though, did you become
 22 uncomfortable in any way about the conversation
 23 you had had with Dr. Burton?
 24 A. I don't think I had another
 25 conversation with her after that that I can

1 recall.

2 Q. Did you become, because of that

3 conversation with Dr. Dalecki, did you become

4 uncomfortable with the earlier conversation you

5 had with Dr. Burton?

6 A. No. I wouldn't say I was

7 uncomfortable. Sorry. I'm not good at

8 questions out loud.

9 Q. There is nobody that is comfortable in

10 this situation, so you're just fine.

11 MS. LATTIS: That's what I was

12 going to say.

13 Q. Well within the normal range, I would

14 say.

15 So, I am handing you the transcript of

16 the deposition taken of Dean Throop on

17 October 28th. And I'm referring -- and I'll

18 give this to you -- to Attorney Lattis first.

19 I'm going to refer you to lines beginning on

20 page 138, line 21, and ending on page 140 on

21 approximately line 8.

22 A. Okay.

23 Q. Let me know when you're finished

24 reading it. I'll retrieve the document so I can

25 ask you a question or two about it. According

1 to this testimony, Dean Throop testified that

2 she spoke to you about this matter. Do you

3 recall that conversation?

4 A. Yeah, we may have.

5 Q. My question is, do you recall that

6 conversation?

7 A. Not clearly.

8 Q. Do you remember anything at all about

9 it?

10 A. I remember talking to her about -- this

11 is why I had said earlier, I wasn't sure if that

12 was the only time I had talked to her, because

13 that was a while ago. If we did talk about it

14 then, that was after the conversation that I had

15 had with Dr. Dalecki where he had pointed out

16 where some of the things could have gone wrong

17 if I had agreed to house sit. I don't remember

18 the conversation incredibly clearly, though, to

19 be honest.

20 Q. Just to confirm your earlier testimony,

21 though, no part of that conversation you had

22 with Dr. Burton about house sitting made you

23 feel uncomfortable; is that true?

24 A. At the time I had the conversation with

25 Dr. Burton, no.

1 Q. No, it's not true or, yes, it is true?

2 A. Sorry. At the time that I originally

3 agreed to house sit for Dr. Burton, I was not

4 uncomfortable. After my conversation with

5 Dr. Dalecki, I realized I probably should have

6 been uncomfortable given the potential for

7 things to have gone awry, is probably the best

8 way to put that. Sorry. Many conversations,

9 many dates.

10 Q. Do you recall any conversations at the

11 department, department level, at departmental

12 meetings or informally about communication

13 training or conflict resolution training?

14 A. Communication training?

15 Q. Yes.

16 A. Or conflict resolution training?

17 Q. Yes.

18 A. Not off the top of my head.

19 Q. Do you think that that sort of training

20 would have been useful to the department back in

21 2014?

22 A. For me, probably not. At that point I

23 don't think I was all that aware as to what

24 tensions really existed at that point in time.

25 Most of my conversations and actions at that

1 time were guarded by the fact that Sabina was

2 going to have a vote, a potential vote on my

3 tenure decision. She actually sits on the

4 college or university level committee right now.

5 And I didn't know that while she sits on that

6 one, she didn't have a department vote because I

7 was so new, and it's a different process than

8 the last institution I was at.

9 Q. Were you aware that Dr. Burton was on a

10 leave of absence for most of the spring 2015

11 semester?

12 A. Yes.

13 Q. Do you have any knowledge or

14 understanding about the basis for that leave?

15 A. Only what I have been told. I don't

16 know anything from Sabina.

17 Q. What have you been told?

18 A. That she was out on medical leave. I

19 actually don't know the specifics beyond she was

20 on medical leave.

21 Q. Who shared that information with you?

22 A. Mike Dalecki did.

23 Q. Anybody else?

24 A. I don't -- he was the first one to send

25 the e-mail, which came at about 10:30 p.m. the

1 night before classes started.
 2 Q. Did you ever, did you have any contact
 3 with Dr. Burton while she was on medical leave?
 4 A. I don't believe so.
 5 Q. Did Dr. Dalecki indicate any -- was he
 6 upset that she was on medical leave?
 7 A. The next morning after we all showed up
 8 to work for classes, his primary concern was
 9 getting the classes filled. I think -- I'm
 10 sorry. The question was how -- what did
 11 Dr. Dalecki --
 12 Q. The question was, was he upset over the
 13 fact that Dr. Burton was on medical leave?
 14 A. I don't think he was upset that she was
 15 on leave necessarily. I think he was upset that
 16 he had to be straddled with finding people to
 17 cover the classes at the last minute, which he
 18 did an admirable job at being less panicked than
 19 I was about that.
 20 Q. Did you cover any of those classes?
 21 A. I offered to cover her Women in the Law
 22 courses given my specialty. Coincidentally, one
 23 of those classes conflicted with one of my
 24 research methods classes, and he ended up hiring
 25 somebody else to teach those two courses in

1 Platteville, did Dr. Dalecki suggest that you
 2 rent an apartment from someone?
 3 A. Yes.
 4 Q. Who was that?
 5 A. He suggested that I talk to
 6 Joel Klinge. K-L-I-N-G-E, I think. That he
 7 knew Joel, he knew the building was built
 8 relatively recently, so it was a nicer housing
 9 facility than some other rental options in the
 10 area in a college town. He suggested that would
 11 be somebody that I could talk to about an
 12 apartment.
 13 When I was here for my apartment tour,
 14 he did -- not my apartment tour -- my interview,
 15 there's a town, like a campus, a community tour,
 16 and he did point out some other places. He
 17 pointed out some houses. And we were just
 18 looking at housing values and --
 19 Q. Do you know whether or not Mr. Klinge
 20 was a friend or an acquaintance of
 21 Dr. Dalecki's?
 22 A. He's an acquaintance of some sort.
 23 Dr. Dalecki used to be the town councilman. I
 24 don't know the title. I don't know politics
 25 very well. But I do know Dalecki was

1 particular. And then another, two other faculty
 2 members picked up her remaining two classes.
 3 Q. How is your relationship with
 4 Dr. Burton now? So, let's say from the period
 5 from her return to service to the present.
 6 A. She's been really happy-go-lucky.
 7 She's talked a lot about her daughter, Sara, is
 8 the one who's back from Whitewater. And Sara
 9 was sick. If I didn't know about this stuff, I
 10 wouldn't guess that this stuff was going on.
 11 Q. Would you describe her as collegial?
 12 A. Yes.
 13 Q. How about her relationship with others
 14 in the department at this time, would you
 15 describe those as collegial, to the best of your
 16 knowledge?
 17 A. To the best of my knowledge, from those
 18 that I see her interact with, yes. Especially
 19 Staci.
 20 Q. And who is Staci?
 21 A. The department chair.
 22 Q. Thanks.
 23 A. I do know -- well, yes. Sorry.
 24 Q. Going back to the time when you began
 25 first looking for apartments here in

1 instrumental in having that apartment complex
 2 built in town when a lot of the town residents
 3 did not want that building built so that it
 4 would provide more affordable rental options for
 5 everybody.
 6 Q. Did you have occasion to discuss the
 7 apartment hunting process with Roger Burton,
 8 Dr. Burton's husband?
 9 A. Yes. We talked about apartment places
 10 in town, anything that he knew about any of
 11 them. He maintains a Website, actually Roger
 12 does, maintains a Website of available rental
 13 housing options in the area that was actually
 14 very helpful to serve as a resource, just to
 15 have a list for somebody who's definitely an
 16 out-of-towner. Any help is help.
 17 Q. Did you contact him?
 18 A. Roger?
 19 Q. Yes.
 20 A. Yes.
 21 Q. He did not contact you?
 22 A. No. I believe Sabina gave me his
 23 number and I contacted him, to the best of my
 24 recollection.
 25 Q. Let's talk a little bit about the

1 German delegation visit during the summer of
2 2014 when you did some work on that project at
3 that time. How did it first come to your
4 attention that you had an opportunity to work on
5 that, to perform some work?

6 A. I think I was just in the office. I
7 found out about that about two weeks after
8 moving into town. And I don't think I had
9 Internet yet, and I did not have hardly any of
10 my belongings, and I was just in my office, I
11 believe. There may have been an e-mail from
12 Mike. I haven't thought about that, actually.
13 That sounds kind of bad to say since I worked
14 with them so much, but I don't --

15 Q. That's fine. If you don't, we don't
16 want you to be guessing here.

17 A. Okay.

18 Q. Do you recall what Dr. Dalecki wrote or
19 said about Sabina's involvement with the German
20 delegation?

21 A. Yes. He said that she wasn't going to
22 be able to work -- those aren't the exact words,
23 but that she wouldn't be able to or she wasn't
24 able to do anything with the German students
25 anymore and they were coming into town shortly

1 like to ask a question in private?

2 MS. STACKMAN: Yes.

3 MS. LATTIS: Is that okay?

4 MR. HAWKS: That's fine. I have
5 no objection.

6 (Brief recess)

7 Q. Dr. Stackman, do you have anything you
8 want to add to your past testimony?

9 A. No, sir.

10 Q. The \$1,700, do you recall whether you
11 were promised that payment before or after the
12 German delegation departed from this state?

13 A. I did not have an amount that I would
14 be paid at the very beginning of it. That
15 amount was discussed after the students left.

16 Q. When was it first discussed?

17 A. Either the last few days the students
18 were here or shortly after the German students
19 left.

20 Q. And so then -- who discussed it?

21 A. Mike and I.

22 Q. Anybody else present at the time that
23 discussion occurred?

24 A. No, not to my knowledge.

25 Q. And was there some give and take on the

1 on that -- sorry. I'm spending more time
2 looking for appropriate words.

3 MS. LATTIS: Just take your time.
4 I think that what Attorney Hawks is interested
5 in is just what you recall about what he said.
6 And if you don't recall, I think he'd like to
7 know that, too. Is that fair?

8 MR. HAWKS: That's fair.

9 A. At the very beginning?

10 Q. Yes.

11 A. I don't know that I had a specific
12 reason in the very beginning that I knew of from
13 him. If he said anything, it probably had to do
14 with her family illnesses at the time, but
15 beyond that, I don't really recall specifically.
16 Sorry.

17 Q. Were you paid for the service you
18 provided on the German delegation?

19 A. Yes.

20 Q. How much was that?

21 A. \$1,700.

22 MS. STACKMAN: Can I ask Jennifer
23 a question?

24 MR. HAWKS: Sure.

25 MS. LATTIS: Do you mean you'd

1 price or --

2 A. Yes.

3 Q. Describe that conversation, please.

4 A. I think Mike had initially offered
5 close to a thousand dollars. And as a new
6 faculty, I was testing out how to negotiate.
7 And so I had suggested a counter amount. I do
8 not recall exactly how much. And eventually we
9 settled on 1,700.

10 Q. Do you know where the -- what the
11 source of those funds was?

12 A. No idea.

13 Q. Did Dr. Dalecki display any animosity
14 toward Dr. Burton during the German delegation
15 visit?

16 A. At times it did appear that he was
17 frustrated with her. And some of the exchanges
18 that they had, that I was not aware of the
19 content of those conversations.

20 Q. What did he say or do that led you to
21 the conclusion that he was frustrated with her?

22 A. When I tried to share with him that I
23 thought Sabina pulled out of the German student
24 trip because of genuine health concerns, family
25 medical concerns, he told me that there was more

1 information that I was not privy to, that he
 2 believed that it was not -- he believed that her
 3 pulling out of the German trip was intentional.
 4 Q. Intentional in what way? Intentional
 5 to tend to her mother's illness? How did he
 6 mean or how did you understand his meaning to
 7 be, intentional?
 8 A. The impression that I got was that
 9 while there may have been some medical concerns
 10 that Sabina was dealing with involving her
 11 family or herself or whomever, that part of the
 12 reason Sabina backed out of the trip was
 13 intentional to leave it in Mike's hands and to
 14 basically watch him scramble to cover it up.
 15 Q. And he left you with that impression?
 16 A. Yes.
 17 MR. HAWKS: I believe we had a
 18 knock at the door here.
 19 (Brief recess)
 20 MS. LATTIS: Sorry about that.
 21 Q. Do you recall whether or not he was
 22 angry on the day that the German delegation
 23 arrived here in Wisconsin?
 24 A. I think the very first several days we
 25 were so busy trying to figure out what was still

1 going on, especially given the tornado, Mike and
 2 I were overwhelmingly concerned with the fact
 3 that the German students were here. There was
 4 virtually no food on campus. There was no
 5 electricity. There was no hot water. There
 6 were no pillows in the rooms. That, and the
 7 attempts to try and reconfirm that day and
 8 potentially the next day's activities given the
 9 tornado and knowing that it had gone through
 10 Madison, that knowing how our itinerary would
 11 change, that was overwhelmingly what I recall
 12 being the focus of the first couple of days.
 13 Q. I want to go back just momentarily.
 14 Handing you a copy of a document that's
 15 previously been described in prior depositions.
 16 MS. LATTIS: Anne, this is an
 17 October, 28th, 2014 letter to Dr. Burton from
 18 Dean Throop.
 19 MS. BENSKY: Thank you.
 20 Q. My first question is, have you ever
 21 seen this before?
 22 A. No.
 23 Q. Did Attorney Lattis correctly describe
 24 this document?
 25 A. Yes.

1 Q. I'd ask you to turn to the second page
 2 of the document, please. You see a paragraph
 3 four? Do you see that?
 4 A. Yes.
 5 Q. Would you read that, please.
 6 A. "You asked..."
 7 Q. Oh, no. To yourself, to yourself. Let
 8 me know when you're finished.
 9 A. I'm finished.
 10 Q. Do you see the sentence there that
 11 reads that this request, that being the request
 12 to house sit, --
 13 A. Uh-huh.
 14 Q. -- was inappropriate and placed a
 15 junior colleague in an awkward situation?
 16 A. Uh-huh.
 17 Q. Did you feel that at the time that
 18 request was made of you?
 19 A. No.
 20 Q. "As a result of this unprofessional
 21 demand..."
 22 By the way, did you feel that the
 23 demand -- well, first of all, was it a demand?
 24 A. No.
 25 Q. Was it unprofessional?

1 A. Not at the time that it was made by
 2 Dr. Burton.
 3 Q. And that sentence goes on to say "as
 4 well, other poor interactions with
 5 Dr. Stackman." Have you had any other poor
 6 interactions with Dr. Burton? Let me back that
 7 sentence up. Have you had any poor interactions
 8 with Dr. Burton?
 9 A. I don't think so.
 10 Q. So, you wouldn't know what Dean Throop
 11 is talking about there; is that right?
 12 A. No, sir.
 13 Q. That sentence finishes by saying, "We
 14 had to remove you as her mentor." Would you
 15 have considered, would you have considered
 16 Dr. Burton as a mentor?
 17 A. This letter is dated October 28th of
 18 2014. To my knowledge, Mike Dalecki had
 19 assigned himself as my mentor at the beginning
 20 of the semester. And to my knowledge, I was
 21 supposed to be Sabina's mentee when I was hired.
 22 And as a part and parcel of other things going
 23 on that I did not know, Dr. Dalecki decided that
 24 he would be my mentor and not her. So, I didn't
 25 know as of the date of this letter that she was

1 considered to be my mentor at that point in
 2 time.
 3 Q. Well, she was not your mentor?
 4 A. Not that I ever knew.
 5 Q. Let me back up. Did you at some point
 6 in time think that Dr. Sabina was likely to be
 7 your mentor?
 8 A. Yes.
 9 Q. And when, approximately when did you
 10 think that was likely to be the case?
 11 A. Early -- late into the hiring process.
 12 So, after I was offered the position but before
 13 I arrived to campus, somewhat through the
 14 semester, too. Sorry. The summer, not the
 15 semester, the summer. Though, after the
 16 situation with the German students, that came
 17 into question.
 18 Q. So, let me try to understand your point
 19 in your prior testimony. You never knew that
 20 she was your mentor to have been removed from
 21 being your mentor; is that correct?
 22 A. Correct. The only time that I thought
 23 she was my mentor -- Mike is the one who
 24 officially, as the department chair, appoints
 25 mentors and mentees. And from the beginning

1 Mike had told me that Sabina had been interested
 2 but that he was going to be my mentor. There
 3 was a mentor/mentee luncheon that happened maybe
 4 very end of the summer, and Mike attended it as
 5 my mentor, and so did Sabina.
 6 Q. As your mentor?
 7 A. I don't really know how to answer that
 8 one. Yes, she showed up. She was under the
 9 impression she was my mentor. I was very
 10 confused.
 11 Q. Understandably, understandably.
 12 A. Yes.
 13 Q. So, at least from your point of view
 14 was there any reason for Sabina not to serve as
 15 your mentor?
 16 A. I think, given the events that were
 17 going on -- so, the question was, was there any
 18 reason --
 19 Q. From your point of view, was there any
 20 reason for Sabina not to be your mentor?
 21 A. When?
 22 Q. Then. Late summer, 2014.
 23 A. Yes. Because I just wasn't sure all of
 24 what was going on with her and whoever else may
 25 have been involved at that point. At that point

1 I agreed with Mike that Mike should have been my
 2 mentor, at the very least, to insulate me from
 3 whatever may have been going on, because I was
 4 so new, and I really had no idea about any
 5 history or anything.
 6 Q. You had -- let me give you a question
 7 that's articulate here. You had no idea of what
 8 was going on or the history. That would suggest
 9 that you had no idea that there was even an
 10 issue; is that correct or incorrect?
 11 A. Well, that would be inaccurate. My
 12 words would have been inaccurate. I had a
 13 baseline preliminary understanding that there
 14 were tensions between Mike and Sabina and
 15 between Sabina and Tom Caywood. I did not know
 16 much about the history of them.
 17 Q. Do you know much, do you know much more
 18 about the history of those tensions now than you
 19 did in 2014?
 20 A. I know more. I don't know if I know
 21 much more.
 22 Q. What more do you know now about the
 23 history of tensions between Dr. Burton and
 24 Drs. Caywood and Dalecki?
 25 A. I know that Sabina felt like Tom was

1 unfair at certain times. I know Sabina had --
 2 at the beginning of the fall or end of the
 3 summer, somewhere after I was officially hired
 4 and basically when the fall started, I saw a
 5 transition in Sabina where she no longer thought
 6 as highly of Mike as she had when Mike first
 7 began his position, that some things had changed
 8 in the spring of 2014.
 9 Q. At some point in time did you become
 10 aware that Dr. Burton had filed a lawsuit
 11 against Dr. Caywood, Dean Throop and the Board
 12 of -- the chancellor -- the Board of Regents?
 13 A. I don't think I knew that the lawsuit
 14 had to do with them. I knew there was a lawsuit
 15 involving Mike.
 16 Q. And when did you first acquire that
 17 knowledge?
 18 A. Over summer or fall, 2014. I knew Mike
 19 was hesitant about talking with Sabina. I don't
 20 know exactly when I became aware that there was
 21 a lawsuit between Mike and Sabina, except I knew
 22 during the fall, I think.
 23 Q. Thank you. Did Dr. Dalecki ever
 24 provide you with a reason why he was your mentor
 25 and not Dr. Burton?

1 A. I don't know if he gave me an explicit
 2 reason. I know it had to do with a lot of the
 3 stuff that was going on with Sabina. And he
 4 made it clear that some of the things that she
 5 was telling me, like about why she could no
 6 longer help out with the German students, was
 7 different than the information that he had and
 8 that there was other information that I was not
 9 privy to.

10 Q. Did you ask him to share that
 11 information with you?

12 A. No.

13 Q. Did he volunteer to share that
 14 information with you?

15 A. No.

16 Q. By the way, I believe you testified you
 17 did house sit for colleagues back in Kentucky;
 18 is that correct?

19 A. I babysat for a colleague. I had
 20 driven past somebody's house to make sure the
 21 house was okay. I have done house chores with
 22 other colleagues, as odd as that might sound.
 23 Hung out with colleagues outside of work many
 24 times. It was a very small department there.

25 Q. Did doing any of those things make you

1 feel uncomfortable?

2 A. No. Which is why I didn't think
 3 anything of it when Sabina asked.

4 Q. Did Dr. Burton ever ask or identify a
 5 specific date that she was interested in having
 6 you house sit for her?

7 A. She may have given me a ballpark week
 8 or two. I don't recall if she gave me a
 9 specific date.

10 Q. In the conversation you had with
 11 Dr. Dalecki where this issue you came up --

12 A. Which issue?

13 Q. The house sitting. Did you form it as
 14 a complaint to Dr. Burton for offering -- for
 15 requesting that you consider this?

16 A. No, no. It probably just came out as a
 17 part of conversation. I'm actually surprised
 18 there's so much about this. I guess I didn't
 19 think there was --

20 Q. Surprised that it found its way into a
 21 Letter of Direction?

22 A. Yes. And the whole mentor/mentee
 23 thing. I didn't think much of it at the time
 24 other than I knew there were some things going
 25 on with Sabina and things that she was saying

1 that did not match up with what Mike was saying.
 2 And he's the department chair, and I didn't know
 3 what kind of role or responsibility he would
 4 have in my promotion and tenure process here.

5 And at the time I felt better with
 6 Mike as my mentor because I didn't know what to
 7 expect or what to anticipate with Sabina. When
 8 Sabina would tell me her reason, for example,
 9 not working with the Germans, and then Mike
 10 would tell me that there were other things going
 11 on that I was not privy to, it just made more
 12 sense for me to not be her mentee.

13 Q. Was it also your perception that the
 14 department chair had more power in managing the
 15 department than did a tenured faculty member?

16 A. What do you mean by "managing"?

17 Q. In making assignments and allocating
 18 class --

19 A. Oh, yes.

20 Q. Did that comfort you somewhat to know
 21 that there was a department chair who was your
 22 mentor as opposed to someone who's merely a
 23 faculty member?

24 A. Yes and no. It was comforting to know
 25 that he had the capability to protect me if

1 something were to go wrong or if she were to
 2 accuse me of something. And she never did, to
 3 my knowledge. But it was comfortable to know
 4 that he could protect me for whatever protection
 5 I needed, I guess.

6 Q. From anything?

7 A. From anything, I guess. I mean, at the
 8 time I don't think I was that familiar with what
 9 the real power dynamics were here because it's
 10 so different from the place I was. The last
 11 institution I was at, you have to understand, it
 12 was my department chair that made the sole
 13 decision about who was going to get tenure or a
 14 variation of tenure at the time.

15 So, I was very accustomed to working
 16 closely with a chair and making sure that I was
 17 doing what the chair wanted. My last chair was
 18 incredibly explicit about what she wanted me to
 19 do almost verbatim. And if you stepped outside
 20 of that line, it was a big problem. So, I have
 21 been accustomed to learning what my department
 22 chair wants and, as a good person who does my
 23 job, following the role of whatever my
 24 department chair told me.

25 Q. Did you ask Dr. Burton and her husband

1 to stand in at your wedding?
 2 A. Originally, witnesses.
 3 Q. I don't know the rest of that story.
 4 Why did you ask them to do that?
 5 A. When we first got into Wisconsin, my
 6 partner and I, the same-sex marriage had become
 7 legal for, like, five days. I didn't really
 8 know anybody else in the area well enough to ask
 9 somebody to serve as a witness, and I had asked
 10 if she and Roger would serve as witnesses
 11 because they were two witnesses. The day that
 12 we went to apply for -- well, we went and we
 13 applied for a license.
 14 We filled out the application. We
 15 were slated to go back and pick up our marriage
 16 license to be officiated, and it was the day or
 17 two before the five- or six-day window that we
 18 could pick that up that the federal people had
 19 paused that, so to speak. The federal circuit
 20 court had kind of reinstated the ban
 21 temporarily.
 22 Q. So?
 23 A. So, we didn't end up getting married.
 24 We did later in October.
 25 Q. When was the original date that you

1 were associated with Sabina. This is --
 2 Q. There may not have been. There is no
 3 information one way or the other and you have no
 4 reason to believe that she ever instigated a
 5 complaint against you?
 6 A. Not to my knowledge. I know students
 7 talked to Dalecki. And I know he was, in my
 8 opinion, a little too receptive to those
 9 conversations with the students. A department,
 10 a good department chair will receive a complaint
 11 from a student, ask for the baseline
 12 information, ask the student to explain what's
 13 going on, and then will call in the faculty
 14 member and just ask for a question about
 15 whatever the student had alleged and would allow
 16 me, the faculty member in question, to respond.
 17 I just had a student complaint with
 18 Staci, the current department chair, and that's
 19 how it went. I found out sometime that Mike had
 20 had numerous conversations with students on many
 21 occasions about me and my teaching. And I don't
 22 know what was said in them, but the impression
 23 that I got was, he -- I don't know if he liked
 24 the attention. I don't know what it was. Mike
 25 took a very interesting liking to me. He was

1 were first considering for this, for the
 2 wedding?
 3 A. Like, June 17-ish, around there.
 4 Q. Would that have been before or after
 5 the house sitting issue came up?
 6 A. After. I would have -- women I was
 7 close with in Kentucky, I would have most
 8 certainly asked them to come. And they were
 9 kind of upset that they couldn't come up from
 10 Kentucky to be with us, so...
 11 Q. Do you have any reason to believe that
 12 Dr. Burton has ever instigated a complaint by a
 13 student against you?
 14 MS. LATTIS: I'm sorry. A
 15 complaint by a student?
 16 MR. HAWKS: Against Dr. Stackman.
 17 MS. LATTIS: You mean did
 18 Dr. Burton --
 19 MR. HAWKS: Instigate.
 20 MS. LATTIS: -- ask a student to
 21 complain about Dr. Stackman?
 22 MR. HAWKS: Or otherwise
 23 instigate it.
 24 A. No. I knew of complaints against me in
 25 the fall of '14, but I had no idea any of them

1 very attentive to me, I think, largely because I
 2 also come from a big research background. And
 3 Mike saw that he and I were close in terms of
 4 both being willing to teach research methods.
 5 He also taught in the department. And
 6 Mike was very, very, very heavily involved in
 7 what I did, every decision, almost every
 8 decision that I made in the fall semester when I
 9 first started here. And he very heavily
 10 cautioned me about what to do in a classroom.
 11 He was very specific about what he did not want
 12 to see me or any other faculty member do. Mike
 13 is quite vociferous about those things.
 14 And I think in his mind he was --
 15 well, I can't imagine what was in his mind, but
 16 I got the impression that Mike had more than one
 17 or two conversations with students. One
 18 student, in particular, I found out about
 19 afterwards, who the student was that was making
 20 a complaint. And, coincidentally, that student
 21 and I are very close friends now. She makes the
 22 very best coffee downstairs, and she knows what
 23 I order, and she's great. And I don't really
 24 know how it went from as angry as it was with
 25 her when she made the complaint to how she is

1 with me now. I have no idea what happened in
 2 those conversations.
 3 Q. So, let me make sure I understand. She
 4 complained about you to Dr. Dalecki?
 5 A. Uh-huh.
 6 Q. And Dr. Dalecki did not tell you that
 7 she had complained about you, but you learned
 8 from some other source that she had complained;
 9 is that correct?
 10 A. With regard to this particular student,
 11 I didn't know about her being one of the
 12 complainants until afterwards. I know there
 13 were many students that complained.
 14 Q. "Until afterwards." After what?
 15 A. Until just about the time that -- how
 16 do I find some words here? Mike never indicated
 17 who the student was when students were making
 18 complaints. I did get the impression it was
 19 more than one, and I did not have any idea who
 20 the students were that were making the
 21 complaints or what they were except that the
 22 students thought that I was impossibly
 23 difficult, I was rude, I had standards that they
 24 could never possibly meet, stuff of this nature.
 25 I found out afterwards who one of the

1 how it went from that to where we are now, but I
 2 never acted to her that I knew that she -- or
 3 that I had guessed that she might have been one
 4 of the students that complained. And we're fine
 5 now.
 6 Q. How would you describe or compare the
 7 department dynamics since the beginning of
 8 Dr. Strobl's service as chair compared to the
 9 prior year?
 10 A. Completely different.
 11 Q. In what way? First of all, better or
 12 worse?
 13 A. Better. I think Staci is -- partly
 14 because Staci is new, she doesn't have any skin
 15 in the game, so to speak. She was not
 16 necessarily affiliated with one side or the
 17 other, though we could probably guess, and Mike
 18 was abundantly clear that he was filling Staci
 19 in on the events in question so that when Staci
 20 started working, she would know kind of the
 21 baseline of what was going on. You never want
 22 to have a new, brand new department chair start
 23 completely blind to everything, completely
 24 oblivious.
 25 Staci has a very interesting way about

1 students was after the -- after Mike's initial
 2 telling me about these student complaints, I
 3 found out who one of the students was
 4 afterwards. I just put two and two together
 5 actually because I had seen her in his office
 6 several times.
 7 And at some point during the semester
 8 I was talking to the student. And at the
 9 beginning of the semester things seemed okay.
 10 Somewhere toward the middle of the semester she
 11 was really quiet, wouldn't look me in the eyes,
 12 wouldn't talk to me. I tend to be a better
 13 judge of people and people's behavior than maybe
 14 the common Joe is. And I got the impression
 15 that she was probably one of the students who
 16 was angry with me.
 17 I know there was one day during the
 18 semester she was in Mike's office talking to
 19 him, presumably about me. Or I don't have any
 20 idea, frankly, what she was talking about, but
 21 she came out of the office one day, and I tried
 22 to say hi to her, and she stormed past me,
 23 didn't say anything.
 24 Q. Who's "she," the student?
 25 A. The student. And I don't really know

1 her of negotiating the right words in a very
 2 challenging situation. I look forward to
 3 working with her. Actually, I think there's
 4 quite a bit that I can learn from her.
 5 MS. STACKMAN: Do you think it
 6 would be possible I could run to the ladies'
 7 room really quick?
 8 MR. HAWKS: Sure.
 9 MS. STACKMAN: Is that okay?
 10 MS. LATTIS: Yes.
 11 (Recess)
 12 EXAMINATION
 13 BY MR. HAWKS: (Continued)
 14 Q. Did a grad student by the name of R.J.
 15 work with you?
 16 A. Yes.
 17 Q. What was his role?
 18 A. I was supervising R.J. on some
 19 preliminary research on alumni jobs, alumni
 20 getting jobs after tenure. Sorry. Wow. Let me
 21 say that again. When students graduate from the
 22 department, they get sent an alumni survey in
 23 the mail, a questionnaire where we ask them, Did
 24 you get a job? How long after graduation? Were
 25 you happy with your education here at

1 UW-Platteville? And students answer the
 2 questions, and they send it back in the mail.
 3 And I was helping R.J. learn how to interpret
 4 and evaluate that data for Mike. And there was
 5 a second project with Dr. Amy Nemmetz. And
 6 Amy --
 7 Q. I'm sorry. Is that a project that R.J.
 8 was working with Nemmetz?
 9 A. R.J. was working with me.
 10 Q. With you.
 11 A. Yeah. R.J. worked under my direction
 12 for both of those projects. The one,
 13 Mike Dalecki was our client, is how we were
 14 working through it as practice, so to speak.
 15 So, we would pretend that Mike was our client on
 16 the one and that Amy was our client on the other
 17 project.
 18 And I was trying to work him through
 19 the system of asking the client, What does the
 20 client want? Figure out what the client needs
 21 in order to figure out what our next steps were.
 22 The project with Amy involved exit surveys from
 23 a brand new Restorative Justice Conference that
 24 they had just done the spring before I was
 25 hired. And there were some surveys from the

1 attendees from the Restorative Justice
 2 Conference, Did you like the conference? What
 3 did you think was the best? What would you like
 4 to see us do again in the future? And so I
 5 helped him evaluate that data for Amy.
 6 Q. Have you done some work on restorative
 7 justice as part of your --
 8 A. Not a whole lot.
 9 Q. Do you know who assigned R.J. to work
 10 with you?
 11 A. Cheryl Fuller.
 12 Q. And how was his performance?
 13 A. I don't think R.J. is a very good
 14 student.
 15 MS. LATTIS: You know, I've just
 16 realized that this is a problem where we really
 17 shouldn't be referring to the student by name in
 18 the transcript. Could we --
 19 MR. HAWKS: R.J.?
 20 MS. LATTIS: Could we just go
 21 forth and call him that, and we'll worry later
 22 on about the redactions.
 23 MR. HAWKS: We could modify the
 24 transcript at this point, as far as I'm
 25 concerned, so it's R.J. throughout.

1 MS. LATTIS: Excellent.
 2 A. And I'd like to clarify my piece
 3 about -- I don't think his performance was all
 4 that stellar of what I would anticipate for a
 5 graduate student.
 6 Q. Did you so advise others in the
 7 department of your opinion about --
 8 A. Advised Cheryl, yes.
 9 Q. Anybody else?
 10 A. Mike, I believe.
 11 Q. When?
 12 A. Sometime -- it was somewhere in the
 13 fall or the spring. I don't remember exactly
 14 when. I had R.J. work on an additional project
 15 for me, which was transcribing some PowerPoint
 16 slides for my research methods classes, and I
 17 had a particular formatting I wanted them in.
 18 They were in a different format, and all he had
 19 to do was type them up into the new formatting,
 20 and there were numerous mistakes made in those.
 21 Q. Were these graduate level projects?
 22 A. This particular one was designed for
 23 him. The PowerPoint transcription, so to speak,
 24 was designed more because he should, as a
 25 student who had already taken an undergraduate

1 research methods course, this was an additional
 2 way for him to prepare, for him to take a
 3 graduate research methods course, because some
 4 of these PowerPoints were ones I was going to
 5 use in the graduate course as well.
 6 I also wanted him to help me find some
 7 videos that, as a graduate student reflecting
 8 back on his undergraduate education and
 9 experience, I was hoping he could help me
 10 identify some videos that would be appropriate
 11 given the content in those chapters that he was
 12 ideally going to be then familiar with once he
 13 had finished the PowerPoints, but he did not end
 14 up working with me in terms of finding those
 15 videos at the end. The other two projects were
 16 definitely graduate level analysis.
 17 Q. Do you know whether or not he was
 18 originally intended to work with you, or do you
 19 know if he might have been intended to work with
 20 somebody else originally?
 21 A. My impression was that R.J.'s --
 22 sorry -- his workload would be shared among the
 23 faculty members and whoever had a particular
 24 project for him.
 25 Q. I believe that there was a social

1 meeting at Steve's Pizza in October of 2014. I
2 think you may have referred to it as a shindig
3 at some point.

4 A. Yeah.

5 Q. Did you attend that?

6 A. I did.

7 Q. Who was there?

8 A. Myself, Mike, R.J. -- student.

9 Q. R.J.?

10 A. Yes. R.J., Deb Rice, Deb's husband,
11 Bill, Ken Weidemann and his wife. Ken is an
12 adjunct for us. Kevan Norin and his wife.

13 Kevin's also an adjunct for us. I may be
14 forgetting somebody.

15 Q. Was the provost there?

16 A. She was at the establishment, not
17 sitting with us.

18 Q. While you were attending that function,
19 did anyone make any comments about
20 Sabina Burton?

21 A. Deb had indicated her frustration at
22 Sabina's sudden departure from the German
23 student trip because Deb was overwhelmingly
24 involved in trying to finalize the details. Deb
25 is really good at detail level work, and she

1 knew a lot of the local individuals in charge of
2 different things, people to contact at different
3 venues, students to contact that could be of
4 help, campus activities and events that the
5 German students could attend to. And so Deb was
6 saddled with a lot of that work in addition to
7 helping out with registration over the summer.

8 And so Deb was still very frustrated
9 about that. Most of what I saw while I was
10 there was that Deb was just kind of saying,
11 just -- I don't know. You have to understand
12 Deb, I guess. She was just very frustrated and
13 just --

14 Q. What were the words that she used?

15 A. I don't remember the words exactly.

16 Q. The sum and substance of the ideas is
17 all that we're interested in.

18 A. Deb was just really frustrated that she
19 was already doing enough work with the incoming
20 freshmen. I just worked on that project this
21 past summer, so I know exactly how involved that
22 is now, and Deb was just frustrated that Sabina
23 had backed out of the trip at the last minute
24 and that Deb ended up getting a lot of that
25 additional work.

1 Q. So, you used the expression backed out
2 at the last minute. Is that language that Deb
3 would have used or Dalecki would have used?

4 A. No. I think that's just me.

5 Q. Do you recall Deb Rice saying anything
6 along the lines of this: Dr. Burton won't be
7 around much longer?

8 A. Not to my recollection, not
9 specifically.

10 Q. Do you recall her disparaging
11 Dr. Burton's mental health?

12 A. No.

13 Q. And do you recall her saying anything
14 to the effect that Dr. Burton was biased against
15 East Germans?

16 A. No.

17 Q. Were you present at any time at which
18 the provost engaged in conversation with any of
19 the members of the, let's call it the party?

20 A. Yes.

21 Q. Do you recall any of the conversation
22 that she had with any of the members of the
23 party?

24 A. We were sitting up in the ship at
25 Steve's Pizza, and she had come in with somebody

1 else; I didn't know who the person was. And at
2 this point in time I don't even think I could
3 guess back as to who the individual was that she
4 was with. She was there for some other event.

5 She reached out, said hello to Mike.
6 Mike said, "Hello. How are you?" That was
7 really about it. And then she went and sat down
8 at her table with her party. I don't even
9 remember how many people she sat with, but I
10 know she wasn't with us.

11 Q. So, do you have any recollection of
12 what she said to --

13 A. Just beyond the, "Hello. How are you
14 doing?" Mike is friendly with the provost,
15 so -- Mike talks to everybody, especially people
16 that are powerful people. He likes to chat.
17 That's Mike.

18 Q. I'm going to ask you to identify,
19 produce and authenticate a few documents.

20 MR. HAWKS: What number are we on
21 on the exhibit list? Anne, are you still with
22 us?

23 MS. BENSKY: I am.

24 MR. HAWKS: Do you recall what
25 number we're at?

1 MS. BENSKY: Who was the last
 2 person deposed? Was that Liz?
 3 MR. HAWKS: Yes.
 4 MS. BENSKY: Let me look. I can
 5 get it from my computer.
 6 (Exhibit No. 101 was marked for
 7 identification by the reporter)
 8 Q. Dr. Stackman, if you could give that to
 9 Attorney Lattis, that would be good. And then
 10 we can refer to the exhibit that's got the
 11 label on it, 101. Do you recognize this
 12 document?
 13 A. Yeah. Yes.
 14 Q. Can you summarize the content of this
 15 document.
 16 A. Sabina reached out to me initially that
 17 Mike had -- I'm going to use the word chastised
 18 her about my using Roger as a real estate agent
 19 to find apartments for rent. And she sent me
 20 this e-mail basically asking for clarification
 21 as to whether or not I worked with Roger to find
 22 an apartment to rent.
 23 And I wrote back a very long and
 24 detailed e-mail to her, as you can see, that I
 25 did not work directly with Roger, that I had

1 actually worked with another Realtor,
 2 Gerard Abing, I think it's Abing, that I had
 3 worked with him, that he had pointed out a
 4 couple places to rent that he knew of informally
 5 that weren't really listed anywhere and that I
 6 was sorry that Mike had suggested to her that I
 7 had worked with, with Roger.
 8 I knew Mike was mistaken, at least in
 9 terms of what I had seen, the information I had
 10 gathered, that Mike said that it was Roger that
 11 I had worked with when I had actually worked
 12 with Gerard. And this e-mail was responding to
 13 her that I wasn't working with Roger.
 14 Q. Thank you. Did you say something to
 15 Mike that would have led him to believe that you
 16 work working with Roger as your real estate
 17 broker?
 18 A. I don't really know how that happened.
 19 I think --
 20 Q. Specifically, did you say anything to
 21 him to lead to that conclusion?
 22 A. I never told him I was working with
 23 Roger. I probably told him I was working with a
 24 real estate agent, and he made the incorrect
 25 leap to assume that it was with Roger.

1 (Exhibit No. 102 was marked for
 2 identification by the reporter)
 3 A. This is very large typing.
 4 Q. Do you recognize Exhibit 102?
 5 A. Yes. It looks like our itinerary for
 6 the German students' visit.
 7 Q. Do you know who prepared this
 8 itinerary?
 9 A. This particular one, no. The font is
 10 larger than the one that I saw.
 11 Q. Would it surprise you to know that
 12 Dr. Burton prepared or created this itinerary?
 13 A. I knew she created an initial one. I
 14 did not know which one. I don't think I've ever
 15 seen -- I know I've never seen this one because
 16 I've never seen one in font this large.
 17 Q. Do you have an understanding of the
 18 work that Dr. Burton had done to make the German
 19 delegation visit possible?
 20 A. Sabina said that she had worked at
 21 putting this together in some part because she
 22 was affiliated with the German students because
 23 she had already gone to Germany, and I believe
 24 this was the same group that she had gone to
 25 visit that were coming back over here. Sabina

1 told me, though, that the initial schedule was
 2 put together by a student that was doing an
 3 independent study or directed study and that the
 4 student was supposed to have put together a very
 5 detailed and confirmed schedule.
 6 Q. The student under Dr. Rice's tutelage?
 7 A. I don't know who the student was under.
 8 Q. Okay. Thank you.
 9 (Exhibit No. 103 was marked for
 10 identification by the reporter)
 11 A. I'm allowed to read this?
 12 Q. Sure.
 13 A. This reflects something I said earlier.
 14 Q. Have you had a chance to review the
 15 document, Exhibit 103?
 16 A. Some of it.
 17 Q. Let me know when you're done.
 18 A. Okay. Well, there's some duplicated
 19 material in here.
 20 Q. I've got a specific question that bears
 21 on the first page, actually.
 22 A. Okay.
 23 Q. Did Dr. Dalecki ever inform you that he
 24 had made a decision to be your mentor rather
 25 than Dr. Burton because he thought it was in the

1 best interest of the -- of you, the mission in
 2 the department, and the university?
 3 A. Of me, yes. I don't know anything
 4 about the mission of the department or the
 5 university.
 6 Q. The first part of that question is, did
 7 he tell you that, that he had made a decision to
 8 be your mentor and deprive Dr. Burton of that
 9 opportunity?
 10 A. Yes.
 11 MS. LATTIS: Well, I guess I
 12 object to the form of the question. Did you ask
 13 her if he said that I intend to be your mentor
 14 and deprive Dr. Burton of the --
 15 MR. HAWKS: I didn't intend that,
 16 but I'll ask that to make it clear.
 17 MS. LATTIS: Okay.
 18 Q. Did Dr. Dalecki use the word "deprive"?
 19 A. No, no. He just simply said that he
 20 was going to be my mentor.
 21 Q. And not her?
 22 A. Yes.
 23 (Exhibit No. 104 was marked for
 24 identification by the reporter)
 25 A. Okay.

1 following the bylaws." Do you know to what he
 2 is referring?
 3 A. I assume he's referring to the
 4 department bylaws.
 5 Q. And had they not been followed to that
 6 point in time?
 7 A. I have no idea. I'm not really
 8 familiar with what the bylaws are. I am aware,
 9 though, that the bylaws are incredibly
 10 contradictory in numerous places.
 11 Q. And in what -- are you aware of a
 12 specific contradiction that you can share with
 13 us?
 14 A. I think there's something in there
 15 about who can serve on a search committee and
 16 who gets to make the appointments to the search
 17 committee or who can serve on a search
 18 committee, I guess technically who can serve on
 19 it and how they are made as official members,
 20 whether that is either done by self-nomination
 21 or by department chair appointment. I believe
 22 that's one of the places.
 23 Q. In this e-mail chain there's a
 24 reference to Steve Elmer.
 25 A. Uh-huh.

1 Q. Have you had an opportunity to review
 2 what's been marked as Exhibit 104?
 3 A. Yes.
 4 Q. Can you briefly summarize the content
 5 of this document.
 6 A. This was an e-mail chain where Liz, the
 7 dean, had announced the results of the chair
 8 search and had basically asked for department
 9 input on who we were interested in having as the
 10 chair, recommending as the chair.
 11 Q. Do you see in this -- by the way, who
 12 is Lorne Gibson?
 13 A. A faculty member who's no longer here.
 14 Q. Who was in a tenurable faculty
 15 position?
 16 A. Correct.
 17 Q. But was not granted tenure; is that
 18 accurate?
 19 A. Correct.
 20 Q. And his last date of work would have
 21 been summer of 2015?
 22 A. Yes.
 23 Q. You notice that in the first paragraph
 24 he writes -- excuse me. In the second paragraph
 25 he writes, "I recommend starting over and

1 Q. Who is Steve Elmer?
 2 A. He's an academic staff in the
 3 department.
 4 Q. And is still an academic staff within
 5 the department?
 6 A. Yeah.
 7 Q. Steve Elmer writes on page 3 of 5 in
 8 this series, in the second sentence, "However, I
 9 am concerned when you mentioned meeting with the
 10 department 'or, at least, those of you
 11 interested in or comfortable with the
 12 discussion."
 13 A. Uh-huh.
 14 Q. And then he goes on to state his
 15 concern. Do you know, first of all, do you know
 16 whether or not some people were not interested
 17 or comfortable in a department-wide discussion?
 18 A. Yes.
 19 Q. Do you know who they were?
 20 A. Myself.
 21 Q. Others?
 22 A. I know Amy expressed her opinions
 23 directly to Liz. I don't know the reason why,
 24 but I do know Amy shared her thoughts about who
 25 she would like to see as department chair

1 directly to Liz and did not share them to the
 2 remainder of the group.
 3 Q. And why were you --
 4 A. To my knowledge.
 5 Q. Anybody else besides you and Amy that
 6 you know shared with Liz that they would not be
 7 comfortable with a department-wide discussion?
 8 A. Not off the top of my head.
 9 Q. Why would you be uncomfortable with a
 10 department-wide discussion?
 11 A. This was a very political and heated
 12 decision about who was going to serve as a
 13 department chair. There was even a fight about
 14 when we were going to do the search. And I knew
 15 that basically no matter what I said, it could
 16 be construed in a way that would hurt me and
 17 make my time in the department incredibly
 18 uncomfortable.
 19 Q. Now, during this period of time
 20 Dr. Burton was on a medical leave of absence;
 21 isn't that true?
 22 A. Yes.
 23 Q. Did she attend this meeting or any of
 24 these meetings?
 25 A. I do not believe so, no.

1 Q. So, there would be no reason for anyone
 2 to be uncomfortable because Dr. Burton was
 3 likely to be present at a department-wide
 4 meeting?
 5 A. Oh, no. It didn't -- my
 6 uncomfortableness had nothing to do with her.
 7 Q. Who did it have to do with?
 8 A. Just my thoughts about whether or not I
 9 thought Mike could be a good department chair.
 10 Q. And your thoughts on that subject are
 11 what?
 12 A. I think Staci was the best appointment.
 13 Q. And were you concerned that if you
 14 expressed a view contrary to Dr. Dalecki, that
 15 that might adversely affect your future here at
 16 UW-Platteville?
 17 A. Yes. Given that he is the chair or any
 18 chair has the opportunity to write a letter to
 19 be included in my file.
 20 (Exhibit No. 105 was marked for
 21 identification by the reporter)
 22 Q. Let me know when you've had the chance
 23 to read this.
 24 A. Yeah. Sorry.
 25 Q. Can you describe Exhibit 105, please.

1 A. An e-mail exchange I had with Sabina
 2 about saying hello to her and Cheryl when my
 3 partner, Jenna, and I were in town house hunting
 4 in February.
 5 Q. Did you have dinner together?
 6 A. Yes, we did. We had lunch with Sabina
 7 and Cheryl. I don't remember when we had
 8 dinner. I know what we had for dinner. The one
 9 time that we've had dinner, I don't remember if
 10 it was during this trip, I could tell you what
 11 we had. I don't remember exactly. I'm trying
 12 to think. We probably did. I know what hotels
 13 we stayed in. I'm sorry.
 14 Q. Okay. Is this earlier in your
 15 testimony you described how Dr. Burton was
 16 helpful?
 17 A. Yes.
 18 Q. Is this an example of that?
 19 A. Yeah.
 20 (Exhibit No. 106 was marked for
 21 identification by the reporter)
 22 A. Wow, I've never read this.
 23 Q. Take your time. Let me know when
 24 you're done.
 25 A. Yeah. When her daughter was in the car

1 accident is when I was applying for this
 2 position. There was a big delay between when I
 3 had put in my application materials and when I
 4 finally heard back. And I found it very unlike
 5 her, given our prior conversations when I
 6 applied years ago. And then I found out that
 7 her daughter had been in a very bad car wreck,
 8 and I felt horribly for her. Okay.
 9 Q. Have you had a chance to review
 10 Exhibit 105?
 11 A. Yes. 106?
 12 Q. Did I lose 105? I must have. I'll
 13 retrieve it later. First of all, were you aware
 14 that the work that Sabina did and would have
 15 done was uncompensated for the -- in terms of
 16 the service in relation to the German
 17 delegation?
 18 A. At the time, when I first helped out
 19 with the trip, I don't think I knew that, no. I
 20 think I became aware of it afterwards. I didn't
 21 know she did all this stuff, though, the
 22 presentation she mentions here in the first
 23 large paragraph. I knew she did a presentation.
 24 I didn't know it involved all this.
 25 Q. Were you aware that, that she had been

1 involved in a prior trip to Germany with the
2 delegation from UW-Platteville criminal justice
3 students?

4 A. Yes. But I didn't know hardly anything
5 about it. I don't even know how long the trip
6 was.

7 Q. Did you know that she was able to
8 translate German to English?

9 A. Yes.

10 Q. Did you know that she had provided that
11 service while they were on that trip in Germany?

12 A. Yes.

13 (Exhibit No. 107 was marked for
14 identification by the reporter)

15 Q. Take a minute to review this.

16 A. Some of it is in German.

17 Q. You can ignore that.

18 A. Okay. I feel like this is information
19 I shouldn't be reading.

20 Q. While you were reviewing the document,
21 you stated that you felt like this was
22 information you should not be reading. Why did
23 you say that?

24 A. I just feel like these e-mails don't
25 involve me, and I feel a little voyeuristic

1 Rountree is where the students were supposed to
2 have been, and Rountree was destroyed by the
3 tornados, so...

4 (Exhibit No. 108 was marked for
5 identification by the reporter)

6 Q. Take a minute and review this e-mail,
7 please. Have you completed your review of this
8 Exhibit --

9 A. Yes.

10 Q. -- 108? Can you summarize the content
11 of the document briefly, please.

12 A. Yeah. I had referred to this earlier
13 about Sabina providing some suggestions as to
14 what committees I might be able to serve on. I
15 did not end up serving on any of them the first
16 year. I just decided that I probably would have
17 enough going on getting my feet underneath me
18 that I did not actually --

19 Q. You see on the first page of this
20 document an entry on April 9th, 2014, in which
21 Sabina Burton writes, "Let's do another Skype
22 soon."

23 A. Uh-huh.

24 Q. Did you and Sabina Skype more than
25 once?

1 seeing e-mails that I've never seen before.

2 Q. Let me go back just, again, the last
3 page of this document.

4 A. 16?

5 Q. Right. So, it appears -- who is
6 Nina Elskamp?

7 A. I have no idea. Sorry.

8 Q. Does she seem to have some relationship
9 to the German delegation?

10 A. Yes.

11 Q. Does it appear that she's in
12 communication with Sabina from June 2nd through
13 June 5th in terms of planning for the German
14 delegation trip?

15 A. Yes.

16 Q. And does it appear that it includes
17 details including the menu?

18 A. Yes.

19 Q. Were you aware that she had done any of
20 this work prior to reading this e-mail?

21 A. No. No, I don't think I knew what she
22 had done or what she hadn't done. When I
23 started with the project, all I knew is what I
24 was told at that point and that we were trying
25 to confirm what to do especially given that

1 A. As a part of the search process, we had
2 Skyped one of the committee, the -- there's a
3 Skype interview that we often prefer to do in
4 lieu of a telephone interview if the candidates
5 are interested. So, we had Skyped there and --

6 Q. But at this time, though, you would
7 have been hired, right?

8 A. Yes.

9 Q. So, did you Skype after you had been
10 hired with Sabina?

11 A. Yes.

12 Q. She suggests that you Skype the next
13 evening. Do you know whether or not that
14 happened?

15 A. Oh, in April, I don't know. I know we
16 Skyped when there was still snow on the ground,
17 but this is Wisconsin. There could have still
18 been snow on the ground in April.

19 Q. Or June, for that matter.

20 A. Right.

21 Q. Does Dr. Burton discuss being your
22 mentor as part of this exchange as well?

23 A. On page 2 she does toward the top. She
24 says that she will tell Mike that I was already
25 using her as a mentor.

1 Q. Just a few more questions, and then I
 2 will be done, Dr. Stackman. Dr. Burton did make
 3 a presentation to the German delegation --
 4 A. Yes.
 5 Q. -- during the trip? Do you know who
 6 changed -- she was originally -- her
 7 presentation date and time was changed. Do you
 8 know who made that change in that schedule?
 9 A. No.
 10 Q. The day after the tornado struck,
 11 breakfast for the delegation was originally
 12 supposed to be on campus but subsequently it was
 13 moved to, I think, Cuba City?
 14 A. Uh-huh. Nick's was the name of the
 15 place in Cuba City.
 16 Q. Do you know who made the decision to
 17 schedule that breakfast or to move that
 18 breakfast down to Cuba City?
 19 A. Mike.
 20 Q. Do you know whether or not -- did you
 21 make any -- do you know whether or not he made
 22 any effort to inform Sabina where the breakfast
 23 was at?
 24 A. I have no idea.
 25 Q. Did you make any effort to inform

1 STATE OF WISCONSIN)
 2) SS:
 2 COUNTY OF DANE)
 3 I, CHRISTAL A. HANSEN, a Registered
 4 Professional Reporter and Notary Public in and
 5 for the State of Wisconsin, do hereby certify
 6 that the foregoing deposition was taken before
 7 me at the University of Wisconsin-Platteville,
 8 Ullsvik Hall, 1 University Plaza, City of
 9 Madison, County of Grant, and State of
 10 Wisconsin, on the 16th day of November 2015;
 11 that it was taken at the request of the
 12 Plaintiff, upon verbal interrogatories; that it
 13 was taken in shorthand by me, a competent court
 14 reporter and disinterested person, approved by
 15 all parties in interest and thereafter converted
 16 to typewriting using computer-aided
 17 transcription; that said deposition is a true
 18 record of the deponent's testimony; that the
 19 deposition was taken pursuant to Notice; that
 20 said VALERIE STACKMAN, Ph.D., before examination
 21 was sworn by me to testify to the truth, the
 22 whole truth, and nothing but the truth relative
 23 to said cause.
 24 Dated November 24, 2015.
 25 _____
 Notary Public, State of Wisconsin

1 Sabina where the breakfast would be at?
 2 A. No. I was trying to play tour guide.
 3 MR. HAWKS: I believe that's all.
 4 Thank you for coming in, chatting.
 5 MS. LATTIS: Anne, are you still
 6 there?
 7 MS. BENSKY: Yes, I'm still here.
 8 I'd like to get -- can I order a transcript?
 9 MS. LATTIS: Sure. Do you have
 10 any questions for Val?
 11 MS. BENSKY: I don't.
 12 MS. LATTIS: Good. Thanks.
 13 MS. BENSKY: I would just like a
 14 condensed transcript.
 15 MR. HAWKS: Same here. And we
 16 will take a draft as well.
 17 MS. LATTIS: And I do not need a
 18 transcript.
 19 (Deposition was concluded at 5:30
 20 p.m.)
 21
 22
 23
 24
 25

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