

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

JOHN DOE,)
)
vs.) 3:17-CV-298
)
UNIVERSITY OF NOTRE DAME.)

TRANSCRIPT OF REDACTED TRO/PRELIMINARY INJUNCTION HEARING
April 28, 2017
BEFORE THE HONORABLE PHILIP P. SIMON
UNITED STATES DISTRICT JUDGE

A P P E A R A N C E S:

FOR THE PLAINTIFF:

PATRICIA M. HAMILL
ANDREW S. GALLINARO
Conrad O'Brien
Center Square West
1500 Market Street, Suite 3900
Philadelphia, PA 19102
(215) 864-8083

PETER J. AGOSTINO
STEPHANIE L. NEMETH
Anderson, Agostino & Keller, PC
131 South Taylor Street
South Bend, IN 46601
(574) 288-1510

FOR THE DEFENDANT:

DAMON R. LEICHTY
EILEEN S. PRUITT
Barnes & Thornburg LLP
700 1st Source Bank Center
100 N Michigan Street
South Bend, IN 46601
(574) 233-1171

ALSO PRESENT: Matthew Lahey, University of Notre Dame

Proceedings reported by stenotype. Transcript produced by
computer-aided transcription.

1 (The following proceedings were held in open court,
2 reported as follows:)

3 **THE COURT:** We're on the record, and the cause number
4 is 3:17-CV-298, John Doe versus the University of Notre Dame.
5 We are here for the preliminary injunction hearing in the case.

6 I know that you all wanted to meet with me in chambers,
7 but I just really don't operate that way. What we did the
8 other day is highly unusual. It is just not my practice to do
9 that. I like to do everything we can on the record. Just for
10 the record, if everybody could state their appearance so I
11 can -- I think I know who everybody is.

12 Sir, if you want to start here.

13 **MR. LEICHTY:** Sure. Thank you, Your Honor. Good
14 morning. Damon Leichty from Barnes and Thornburg for defendant
15 University of Notre Dame.

16 **MS. PRUITT:** Good morning, Your Honor. Eileen Pruitt
17 on behalf of University of Notre Dame.

18 **MR. LAHEY:** Matt Lahey, University of Notre Dame.

19 **MS. HAMILL:** Good morning, Your Honor.
20 Patricia Hamill on behalf of John Doe.

21 **MR. GALLINARO:** Good morning, Your Honor. Andrew
22 Gallinaro on behalf of John Doe.

23 **MR. AGOSTINO:** Peter Agostino on behalf of John Doe.

24 **THE COURT:** Mr. Agostino.

25 **MS. NEMETH:** Stephanie Nemeth on behalf of John Doe.

1 **THE COURT:** Okay. So there were some filings
2 relating to the accuser, sort of, maintaining her
3 confidentiality; and so I'm inclined to seal her -- anything
4 that might identify her by way of documentary evidence. And as
5 it relates to the protective order, I'm going to forward that
6 to the magistrate judge to take care of. I'm quite sure he'll
7 enter that protective order, but I would prefer the magistrate
8 judge handle it so that if there's some dust-up relating to the
9 protective order, he'll be the one who will handle that in any
10 event, and so I'll have Magistrate Gotch handle that.

11 So, Ms. Hamill, why don't you give me a little preview of
12 what you're expecting to do today.

13 **MS. HAMILL:** Sure, Your Honor. I'm happy to do that.
14 A couple of, sort of -- just giving you a sense of the last few
15 days if that's okay with you.

16 **THE COURT:** Sure, that's helpful.

17 **MS. HAMILL:** We have a couple of things to talk
18 about.

19 First of all, we have been, as you might imagine, very
20 busy, all of us, since we left your courtroom on Tuesday. We
21 got Notre Dame's production starting on Wednesday night at
22 about 4:39 p.m., and it went on through until late into the
23 evening, I think it was about 11:30 into the evening, and it's
24 several -- I think it is a couple thousand of pages of
25 documents.

1 The next morning as we were continuing to go through those
2 documents, we noticed they were Bates labeled in a way that was
3 not appropriate. They were out of order. So we asked that
4 there be some correction to that, and those documents were then
5 reproduced to us yesterday. We got a few documents last night
6 that -- I think they were videos -- at about 12:46 a.m.

7 In addition, we made efforts to subpoena Jane Roe's text
8 messages, and we got, approximately, I think about 2000 pages
9 of documents from her yesterday afternoon.

10 So, candidly, have we gotten through everything, of course
11 not; but we've done our best to pull together what we could for
12 purposes of this hearing today. And, obviously, there's much
13 to do with those documents down the road in the litigation; but
14 we did what we could to get those documents to us.

15 We do have an issue that arose this morning that I'm very
16 concerned about. We had planned today and, in part, to be as
17 streamlined as possible, but also, candidly, to -- well, let me
18 just start with -- we were going to call Mr. Willerton and
19 Ms. Ryan, who are the two representatives of Notre Dame who run
20 the Office of Conduct Services and the Title IX, in order to,
21 frankly, put on a large portion of our case in chief because
22 they are the ones who were administering the processes that
23 we're litigating about.

24 I wrote to Ms. -- and excuse me for using my iPhone, Your
25 Honor. I wrote to Ms. Pruitt and Damon yesterday morning at

1 10:28 a.m. to confirm that Ms. Ryan and Mr. Willerton will be
2 in the courtroom and available tomorrow morning so we may call
3 them on cross if we chose to do so. As you can imagine, we are
4 still trying to make our way through the record that you
5 produced late into the evening last night, but we do reserve
6 the right to call either or both of them in our case tomorrow.

7 Ms. Pruitt responded, Patricia, as we indicated yesterday,
8 Ms. Ryan and Mr. Willerton will both be present tomorrow. We
9 don't have plans to call anyone else.

10 We then told them as soon as we had figured out who we
11 were going to call, we then gave them that information.

12 When I showed up this morning for court and talked to
13 Mr. Leichty and Ms. Pruitt to say, Are Ms. Ryan and
14 Mr. Willerton here? They said, No, they will be here this
15 afternoon when we put our case on.

16 I am absolutely -- it was clear that we wanted them and
17 reserved the right to call them in our case in chief, and,
18 frankly, it was an efficient way to put this case on. And they
19 are not here this morning.

20 And so Mr. Leichty and Ms. Pruitt I believe have now sent
21 out messages to get them here, but the idea was to put
22 Mr. Willerton on to set -- he oversees the whole process and
23 then to have Ms. Ryan who does the Title IX portion, and then
24 we have two students who will be here. But we didn't tell them
25 to be here until 9:30, because we figured we would have some

1 time, who will talk about a videotape that we've referenced in
2 our complaint and one other aspect of the case.

3 And Mr. Doe is here today, but we were going to reserve
4 him for the end once we saw what we needed to prove -- what
5 additional things we might need to prove after calling the
6 Notre Dame witnesses in our case in chief.

7 Candidly, I didn't represent, nor did any of the lawyers
8 here at this table, represent Mr. Doe in the underlying
9 proceedings; and I'm not -- I haven't been through everything
10 that's in this record to be able to have him prepared to just
11 get up here today and open the doors and have him be, you know,
12 questioned about any aspect of this case. And so that was --
13 the goal today was to have him certainly here present for Your
14 Honor to the extent you had questions but to reserve him to the
15 end, and it doesn't make -- anyway.

16 So that is a concern for us this morning. We don't want
17 to be disrespectful to the Court, but we are entitled to put
18 our case on. It is our case, it is our burden, and to put it
19 on in a way that we think is appropriate and efficient and
20 effective; and the Notre Dame employees are not here this
21 morning to allow us to do what we thought we had confirmed
22 yesterday.

23 **THE COURT:** So is that the totality of your potential
24 witnesses, the two from Notre Dame, your client, and these two
25 other students?

1 **MS. HAMILL:** That's correct, Your Honor. And,
2 frankly, I think it can be very efficient if we do it that way,
3 and we didn't think it would take, you know, a terribly long
4 time. And the idea of having the Notre Dame employees on cross
5 is to be very directed in what we wanted to ask them and then
6 to move on with other aspects.

7 **THE COURT:** Okay. Let me hear from them and then I
8 will come back to you.

9 Mr. Leichty.

10 **MR. LEICHTY:** Thank you, Your Honor. Let me address
11 the witness concern. I was actually meeting with Mr. Willerton
12 and Ms. Ryan, two Notre Dame individuals, yesterday and had
13 indicated to them that they likely wouldn't be coming up until
14 the afternoon, but I think we had scheduled them to be here
15 later morning.

16 I'm aware of the e-mail from Mr. Doe's counsel. I was
17 advised of that yesterday evening, but I guess I did not take
18 from that e-mail that they needed to be here at 8:30. We
19 thought, well, they are going to put on Mr. Doe. That was my
20 impression after talking with opposing counsel after Tuesday,
21 they were going to start off with Mr. Doe. They later told us
22 they were going have two other students that would testify. We
23 said, well, we will have our witnesses here later morning,
24 anticipating that they would go first. There was nothing in
25 the e-mail from opposing counsel yesterday that indicated to me

1 they needed to be here at 8:30 because they wanted to meet with
2 them.

3 **THE COURT:** All right.

4 **MR. LEICHTY:** They are going to be here nonetheless.

5 **THE COURT:** Are they in transit?

6 **MR. LEICHTY:** I believe Heather Ryan is in transit,
7 and Ryan is as well. We reached them this morning. I think
8 the best way to proceed, given this is a preliminary injunction
9 matter, is let's call Mr. Doe, who I understood was going to be
10 called. This is the first I'm hearing they were going to
11 somehow reserve this individual. My understanding from talking
12 with counsel on Tuesday was he was going to be called. We were
13 ready to ask him questions for that matter, and then let's talk
14 to the other two students at 9:30, proceed in an efficient way,
15 and as soon as the Notre Dame individuals are there --

16 **THE COURT:** I'm not going to tell them the order in
17 which they present their witnesses.

18 **MR. LEICHTY:** I understand.

19 **THE COURT:** There might be all sorts of strategic
20 reasons why they want to proceed in the order in which they
21 want to proceed.

22 **MR. LEICHTY:** Your Honor --

23 **THE COURT:** So --

24 **MR. LEICHTY:** If we had known they wanted them here
25 at 8:30, that should have been communicated to us. Mr. Ryan

1 has two Title IX matters that he's dealing with this morning.
2 They are dealing with important matters at the University of
3 Notre Dame. There needed to be some message to me that, hey,
4 we need to disrupt their schedule in that regard to have them
5 here at 8:30. That was never communicated to me. Having them
6 here in the morning -- we arranged for them to be here later
7 morning. I had no idea they were going to start with them. No
8 one said that to me, and that's just where we are, Your Honor.
9 I'm sorry about that, but that's -- that was never communicated
10 to me that they needed them here first at 8:30.

11 **THE COURT:** Are those the only two witnesses you
12 intend to present?

13 **MR. LEICHTY:** And we were going to ask questions of
14 Mr. Doe, Your Honor, but those are the only three.

15 **THE COURT:** How much time do you think it is going to
16 take to present those two witnesses from your point of view?

17 **MR. LEICHTY:** You know, at most, Your Honor, we have
18 45 minutes to an hour.

19 **THE COURT:** Maybe an hour for each of them?

20 **MR. LEICHTY:** Yes, sir.

21 **THE COURT:** And an hour for each of them from your
22 point of view, ma'am?

23 **MS. HAMILL:** I would think that's correct, Your
24 Honor.

25 **THE COURT:** Okay. What about these two student

1 witnesses? I assume these are very, very to the point
2 witnesses.

3 **MS. HAMILL:** Yeah, they are maybe five minutes at
4 most on direct and depending on -- very, very brief. They are
5 just to set up the video and sort of authenticate it, and then
6 another very brief --

7 **THE COURT:** So they will be here hopefully at 9:30?

8 **MS. HAMILL:** Yes, Your Honor.

9 **THE COURT:** So we're going to start with those two
10 because I don't see any sort of problem with getting those two
11 out of the way, and then we're going to wait for these two
12 witnesses to get here from Notre Dame.

13 Would you make sure that we get on the horn to them. And
14 I know we're operating on the fly here; and, frankly, what I
15 wish I would have done, and it just dawned on me, we should
16 have done this in South Bend. I didn't even think about it.
17 We could have readily done this over in South Bend, and I live
18 halfway between here and South Bend.

19 **MS. HAMILL:** We can all get in the car now, Your
20 Honor.

21 **THE COURT:** Yeah, it doesn't do us much good. I wish
22 I would have thought about it. I wish one of you would have
23 thought about it. I apologize for that because it would have
24 been a heck of a lot easier for all concerned, but that ship
25 has sailed.

1 So can I talk back to Ms. Hamill here for a second?

2 **MR. LEICHTY:** Sure.

3 **THE COURT:** Because there's one other wrinkle I want
4 to explore.

5 This May 8th date of the exams --

6 **MS. HAMILL:** Yes, Your Honor.

7 **THE COURT:** -- could you tell me, maybe counsel will
8 know better, what is the exam week at Notre Dame? Is it a
9 two-week period? When does it begin? When does it end? When
10 is commencement? All of those things.

11 **MS. HAMILL:** Commencement I think is, like, the
12 15th -- May 8 to the 12th is exam period, and commencement
13 is the 20th, I think it is. That's what I think I heard from
14 one of the other students yesterday.

15 **THE COURT:** Okay. So it may well be that May 8th
16 isn't the drop dead date here, right? I mean, he could take
17 the exam May 12th, right?

18 **MS. HAMILL:** I think that's true, Your Honor. I
19 don't know how they get administered or even whether -- as we
20 said, he's ready to take it tomorrow if they were ready to --

21 **THE COURT:** I know, but what I'm trying to do is, can
22 we find some, you know, some fudge room here to deal with this
23 complex legal issue --

24 **MS. HAMILL:** Right.

25 **THE COURT:** -- that everybody is operating on the fly

1 here. The reason I raise it is I was told yesterday that my
2 trial next week is now really only going to be a 4-day trial,
3 which frees up next Friday for me --

4 **MS. HAMILL:** Okay.

5 **THE COURT:** -- if we don't get done here today.

6 **MS. HAMILL:** Right.

7 **THE COURT:** And it looks to me like that following
8 week we could even have a day or two and push the taking of the
9 exam, if I were to grant the injunction, to the end of that
10 week. Does that all seem right?

11 **MS. HAMILL:** I think that's correct, Your Honor, yes.

12 And I will say today, your order said TRO. I'm not saying
13 that -- it wouldn't have changed how we prepared because we
14 haven't, obviously, been able to get through the record, but --
15 anyway. So if --

16 **THE COURT:** Here is the problem. I mean, I don't
17 want to get caught up in nomenclature here. Whether you call
18 it a TRO or a preliminary injunction, I'm viewing it as a
19 preliminary injunction because if I grant you your relief then
20 that's the end of the matter. It is not like it is an ordinary
21 case where I would issue a TRO and 10 days later we can
22 evaluate this.

23 **MS. HAMILL:** It is the end of Mr. Doe being able to
24 take an exam, but it holds in place every other aspect of his
25 sanction.

1 **THE COURT:** Understood.

2 **MS. HAMILL:** Okay. I just wanted to make sure we
3 were on the same page.

4 **THE COURT:** Right. But I'm not at all convinced I
5 need to do that.

6 **MS. HAMILL:** Right.

7 **THE COURT:** The only way I can evaluate it is if I
8 hear some evidence like I suggested the other day. I'm not
9 prepared to grant you what you want at this point.

10 **MS. HAMILL:** Right, Your Honor. I understand.

11 **THE COURT:** I know it puts you in a difficult
12 position, but it is what it is. And so whether you want to
13 call it a TRO or preliminary injunction -- it may well be that
14 I will grant you the very limited relief you are seeking and a
15 month from now we will have a full-blown preliminary injunction
16 whereby maybe we collapse the merits of the case --

17 **MS. HAMILL:** Right.

18 **THE COURT:** -- into a preliminary injunction hearing
19 or do it in two months, whatever is reasonable.

20 **MS. HAMILL:** Right.

21 **THE COURT:** I understand, but I'm trying to deal with
22 the immediate situation.

23 **MS. HAMILL:** Understood, Your Honor.

24 **THE COURT:** Does that kind of give you the
25 direction that you need?

1 **MS. HAMILL:** Yes, it does. It does, Your Honor.

2 **THE COURT:** All right. Why don't we -- I would like
3 to hear, sort of, opening statements or comments from you all,
4 and then we'll adjourn until 9:30. Hopefully those students
5 will be here, and we'll hear from them. And we'll just have to
6 wait until these folks, your colleagues get here, hopefully by
7 noon or eleven, whatever it would be.

8 **MS. HAMILL:** That's fine. And my opening remarks are
9 going to be very brief.

10 **THE COURT:** Sure.

11 **MS. HAMILL:** I figured you would want to get moving
12 and you have read the papers.

13 **THE COURT:** Sure. I appreciate that.

14 **MS. HAMILL:** As I had said last Tuesday, Your Honor,
15 the focus here today is narrow. It is not for us to prove the
16 merits of each element of the claims that have been lodged by
17 Mr. Doe. We are here today to ask you for very narrow relief.
18 We want Mr. Doe to be able to take his final exams in courses
19 in which he has already completed the coursework and for which
20 he's already paid tuition.

21 The case law is clear that there's irreparable harm when a
22 student has a permanent gap in his transcript and academic
23 record which can't be undone even if we were to prevail in the
24 merits of this case.

25 **THE COURT:** Can I stop you there and ask you --

1 **MS. HAMILL:** Yes, Your Honor.

2 **THE COURT:** -- how does allowing him to take the exam
3 even address that harm? There's still going to be, sort of, a
4 mark, and he is not going to have the degree conferred upon
5 him. It is as if the relief is not directed at the harm you
6 are articulating.

7 **MS. HAMILL:** Well, it is the most immediate -- it is
8 sort of like taking it one step at a time. If he's not allowed
9 to take his exams and we prevail -- let's say a month from now
10 if we do an expedited preliminary injunction hearing -- he is
11 not going to be able to erase what happened this semester,
12 which is he got dismissed summarily before the end of the
13 semester. He is going to have a gap in his transcript. He is
14 going to have a gap in his record.

15 If he takes his exam it maintains -- if we prevail and we
16 believe we will -- then it is basically as if this never
17 happened in terms of him being able -- him being dismissed from
18 the University.

19 So it is really the most immediate -- if he didn't have
20 exams this week, we might be saying let's just collapse this
21 all into an expedited proceeding on a preliminary injunction,
22 we'll discover the case, and we can go forward. But without
23 being able to take those exams, he will forever not be able to
24 sort of put the genie back in the bottle if we prevail.

25 **THE COURT:** I see.

1 **MS. HAMILL:** That's really -- and the test, and I was
2 going to say for TRO, but for purposes of today, is the balance
3 between the irreparable harm and the reasonable likelihood of
4 success on the merits, and it is sort of a sliding scale.

5 The stronger the irreparable harm, the less we have to
6 show, and vice versa; and I think it is indisputable under the
7 case law that Mr. Doe will suffer irreparable harm. The *King*
8 *v. DePauw* case certainly says that, and there's others that we
9 cited in our brief, and I'm sorry I don't have them right off
10 the top of my head. But when you have that, sort of, gap in
11 your transcript, gap in your record, it is permanent; and you
12 are forever going to have to explain it. Prevailing on the
13 merits a month from now, two months from now isn't going to be
14 able to undo that.

15 And what we're really asking for -- it is almost like the
16 exams are over here on the side, Your Honor. And we want to be
17 able to allow him to take those exams, but everything else
18 about the sanction -- for now, it is the status quo that we are
19 trying to maintain in the narrowest way possible. The rest of
20 the sanction is still in place for him. He's still not going
21 to get his degree. The University still has control over him
22 through this process. He's been dismissed from the University
23 for now other than taking these exams if you'll allow that.
24 And he still needs to reapply or in some way demonstrate under
25 the current sanction that he's entitled to be back as part of

1 the Notre Dame community before he could get his degree. So it
2 is a very narrow request, but it is also absolutely
3 indisputable that it is irreparable harm.

4 And as we talked about when we were here with you on
5 Tuesday, this isn't necessarily -- I know the University is
6 going to say, well, it is irreparable harm to us because we're
7 entitled to administer our processes and every student is going
8 to come running in here. That's simply not true, and we've got
9 a student who is in a very unique situation where he's inches
10 from being finished with his coursework, and that's why we are
11 asking for the current relief.

12 **THE COURT:** So are you saying that if I allow him to
13 take these two exams it is your position that he would still
14 have to reapply to the University in order to get the degree
15 conferred upon him?

16 **MS. HAMILL:** He would have to do something, I think,
17 in order for the University to -- whatever they are going to
18 call it -- but to reapply in some way to be able to get the
19 degree because they still -- the student handbook is clear that
20 while there's a disciplinary proceeding or there is something
21 hanging over, the University has every right to put a
22 disciplinary hold on records which would also include
23 conferring a degree.

24 **THE COURT:** So it may not be reapplying to the
25 University but going through some process by which the degree

1 is going to be conferred.

2 **MS. HAMILL:** Correct.

3 **THE COURT:** And discipline removed or it is
4 conditionally conferred or what have you.

5 **MS. HAMILL:** Correct.

6 And so if we weren't to prevail, and, of course, I believe
7 we will, but if we weren't to prevail, then the University --
8 he still would have the sanction in place. He still wouldn't
9 get his degree right now. He would have to wait, presumably, a
10 year before they would confer the degree on him. That's really
11 the effect of the current sanction, would require him to
12 reapply to the University for spring semester 2018 to repeat
13 what he's done; and at the end of that, presumably, he would
14 have now met all of his course requirements and be eligible for
15 a degree. Does that make sense?

16 **THE COURT:** Yeah, I understand.

17 **MS. HAMILL:** Okay. So today, because I think the
18 case law is very clear, and I think just practically speaking
19 it is clear, that we have a student who's going to suffer
20 irreparable harm if he can't take his exams. We also have the
21 fact he's going to lose his job that's waiting for him upon
22 graduation if he isn't able -- if he would have to go to work,
23 take -- work for a period of time and then come back to South
24 Bend to complete his degree. It is not a local job. It
25 just -- that's a secondary factor beyond the gap in his

1 transcript.

2 So what we have to show is then that we have a reasonable
3 likelihood of success on the merits; but, again, it is a
4 sliding scale with the balance with the irreparable harm. And
5 for Title IX -- for purposes --

6 **THE COURT:** I actually think that that overstates
7 what you have to show. I think the cases in the Seventh
8 Circuit make clear that it is kind of a two-step process by
9 which you first have to show some likelihood, even a negligible
10 likelihood, and once you show that, then we get into the
11 balancing of the harms.

12 **MS. HAMILL:** Right.

13 **THE COURT:** Is that your understanding?

14 **MS. HAMILL:** I think that's correct, Your Honor.

15 **THE COURT:** Okay.

16 **MS. HAMILL:** I guess I was trying to get at that with
17 sort of the -- it is, sort of, a sliding scale; and I think
18 because we have irreparable harm here that's been recognized by
19 the case law, it is actually a fairly low burden for us. And
20 we don't have to prove the reasonable likelihood of success on
21 all of the claims.

22 And so just to give you a sense of what we're going to try
23 to do today, we have a Title IX claim. And it is based on
24 several different theories, but we're focused today on the
25 disparate treatment that the two, Jane Roe as a female and John

1 Doe as a male, experienced through that process. So that's one
2 of the pieces that we're going to show you that we have a
3 reasonable likelihood of success on the merits, and then we
4 have a breach of contract claim that we've also moved on for
5 Temporary Restraining Order at this point. And we're going to
6 show that the process was fundamentally unfair.

7 And one of the cases that's key here is there's a *Doe v.*
8 *Brandeis University* case which arose out of a long-term
9 relationship, and there the Court talked about fundamental
10 fairness in a process in the context of a long-term
11 relationship, the complications of a long-term relationship, as
12 well as the fact that there's no one size fits all of the
13 notice that you need to have, the process that you need to
14 have. And the more complicated the relationship is, the more
15 process is necessary, the more notice is necessary.

16 It is different than when you have a student who comes in
17 and it was a one-night stand and everybody knows it is one
18 night, that's all we are talking about. It is a very
19 different, sort of, case. So I think that's a good model for
20 Your Honor.

21 There were also three cases I just wanted -- I don't think
22 we cited them in the TRO papers, and I want to hand them up to
23 you.

24 **THE COURT:** Sure.

25 **MS. HAMILL:** One is *Prasad v. Cornell*, P-R-A-S-A-D,

1 versus Cornell. I don't have -- I'll hand it to everybody.

2 In that case the Court recognized that there could be a
3 Title IX claim for disparate treatment as between the female
4 complainant and the male respondent in how the University
5 treated them throughout the process.

6 **THE COURT:** Because other cases that I have read have
7 suggested that that's not really the appropriate comparator,
8 the accuser.

9 **MS. HAMILL:** Right. I think there's -- it is an
10 evolving area. One of the things about this, and if you
11 haven't had a case like this before, it is an evolving area of
12 the law. And, frankly, there's cases that they can cite that
13 are helpful to them. There are cases that we can cite that are
14 helpful to us because much of this is developing. It depends
15 on the circumstances of the case, frankly. Sometimes it
16 depends on the court that you are in.

17 And so one of the -- earlier on, say 2013, there was a *Doe*
18 *v. Columbia* at the District Court, Northern District of New
19 York level, which since went up to the Second Circuit. But
20 they set up this, sort of, almost impossible standard in a way
21 you would have to show that a female respondent was treated
22 more favorably than a male respondent. And you would have to
23 show statistics from the University. There's still some courts
24 that do sometimes look at that, but *Prasad* is an example of a
25 court, the District Court in New York, Northern District of New

1 York, that allowed a case to go forward based on the disparate
2 treatment within the process itself as between the female
3 complainant and the male respondent. And I think that's very
4 instructive, and I also think, generally, when you look at
5 Title IX, it certainly gives you the ability to do that.

6 And then the final case which, again, I'll hand up to Your
7 Honor, is *Doe v. Brown University*, and it was decided last
8 September following a preliminary injunction in that case, and
9 there the Court found a breach of contract because the
10 University in its disciplinary proceeding had applied the wrong
11 definition, it was either for coercion or manipulation, but it
12 had applied the wrong definition in adjudging a student
13 responsible.

14 And we have an element here in our case where we have
15 alleged, and Mr. Doe alleged on appeal in his disciplinary
16 matter, that the University applied the wrong definition for
17 dating violence by saying that his threats of self harm
18 constituted physical -- dating violence, which is physical
19 violence or the threat of physical violence. That's more of a
20 legal argument, Your Honor, that also gives us the right to
21 relief today; and I'll hand that case up to you. But that's
22 really the framework in which we're working today.

23 **THE COURT:** Is this a 166 F. Supp.?

24 **MS. HAMILL:** No, that's probably earlier in the year
25 of 2016. It is another Brown University case. I think it is

1 September --

2 Mr. Gallinaro has it.

3 **THE COURT:** Oh, okay.

4 **MS. HAMILL:** This *Doe v. Brown*, it is September 28,
5 2016. *Prasad v. Cornell* was from February of 2016. And *Doe v.*
6 *Amherst* -- this was the other case. *Doe v. Amherst* -- I'll go
7 back to the podium in case this is for recording purposes. *Doe*
8 *v. Amherst* is a case where the Court there allowed a case to go
9 forward on Title IX and, in part, based on the inadequacy of an
10 investigation, where a full compliment of text messages were
11 not gathered by the investigator -- or relevant text messages.
12 It wasn't, you know, necessarily a large portion, but
13 determined, based on -- there are other factors in the case;
14 but one of the aspects of the case that the judge ruled on to
15 allow it to go forward was that the investigator in that case
16 hadn't bothered to go try to find additional text messages that
17 were alleged to be relevant.

18 So that's really it, Your Honor, for us moving forward,
19 but I'm happy to answer any questions you might have.

20 **THE COURT:** Just to go back, I want to make sure I
21 understand, and -- if he is allowed to take his exams, you are
22 saying he'll be able to -- there's two, kind of, harms that you
23 are pointing at. One is it may impact the job that he has, I
24 guess, in Atlanta or somewhere.

25 **MS. HAMILL:** It is in Florida.

1 **THE COURT:** It is in Florida.

2 **MS. HAMILL:** Yes, Your Honor.

3 **THE COURT:** Okay. And then the second is, of course,
4 this, sort of, the stain and the gap in his transcript that can
5 never be, kind of, cured.

6 **MS. HAMILL:** Yes, Your Honor.

7 **THE COURT:** But how does -- this is where I'm not
8 following completely. How does allowing him to take the exams
9 cure the gap in the transcript?

10 **MS. HAMILL:** Right. It would allow -- for two
11 reasons. First of all, let's assume that we're going to
12 prevail on the merits here, and we prevail in July. So Mr. Doe
13 has already left school. He's not -- the exam period is over,
14 and so he was let go from the University prior to being able to
15 complete the course requirements. So he's not -- it is not
16 like he can run back here and take an exam in order to, Oh, let
17 me get my transcript from the spring of 2017 completed. He
18 loses that opportunity when the semester ends. And so if we
19 prevail, he would still have the fact that he has an incomplete
20 semester on his transcript; and, frankly, he would have to
21 complete his semester somewhere. So he's going to have that
22 gap.

23 The second piece of this, and we're not going to belabor
24 it, but you can't just as a student pick up and say, you know
25 what, I need two more credits. I'm going to go apply to the

1 University of Florida and get those two credits, and now I will
2 get a degree from the University of Florida. When you have
3 this type of situation, you have to get adequate numbers of
4 credits even if you went to a transferring institution. So the
5 cases that we cite in our brief on the TRO, irreparable harm,
6 focus in on the fact that you have this problem now with your
7 academic record with your transcript. And so if I'm not being
8 clear --

9 **THE COURT:** No, that was very helpful. I understand
10 that.

11 **MS. HAMILL:** Okay.

12 **THE COURT:** Okay.

13 **MS. HAMILL:** Thank you, Your Honor.

14 **THE COURT:** Okay.

15 Mr. Leichty, are you going to --

16 **MR. LEICHTY:** Thank you, Your Honor.

17 Your Honor, thank you. Let me touch on a couple points
18 from my counterpart's comments.

19 First, I don't think this is an injunction to maintain the
20 status quo. This is, as we know from the Seventh Circuit
21 precedent, is an affirmative injunction. The dismissal has
22 already occurred. Mr. Doe has been dismissed from the
23 University. What Mr. Doe's counsel is seeking on his behalf is
24 an affirmative injunction that seeks affirmative relief,
25 whether that be the exams or something else.

1 And as the Seventh Circuit lays out in terms of the
2 standard that applies, there's a certain higher scrutiny that
3 applies to an affirmative injunction, that burden is higher.
4 There's a couple cases I would provide Your Honor on that
5 front. One is the *Kartman* case, 634 F.3rd 883.

6 **THE COURT:** I'm sorry, could you repeat that.

7 **MR. LEICHTY:** Certainly. *Kartman*, K-A-R-T-M-A-N,
8 634 F.3d 883, Seventh Circuit case from 2011 that speaks in
9 terms of the mandatory injunction and the burden, particularly,
10 on the forefront as Your Honor appropriately describes the
11 burden of the injunction. It is not as though we just look at
12 all these factors and balance them together. There is a
13 separate burden. You have to show the likelihood of success on
14 the merits and other elements before we get to, sort of,
15 balancing those or the sliding-scale test. The *Kartman* case
16 speaks specifically to this burden, including on the forefront
17 of the standard, when we're dealing with an affirmative
18 injunction as we are in this case.

19 **THE COURT:** I know that there's cases that say that,
20 but why is that the case? Why should it be -- what sense does
21 that make, the fact that you're enjoining somebody to do
22 something versus enjoining somebody to not do something?
23 Honestly, should that matter?

24 **MR. LEICHTY:** Your Honor, I'll be honest with you.
25 I'm not sure I've studied all the reasons why the Seventh

1 Circuit and the judges on the Seventh Circuit have said that
2 should be the standard, but I do know that that is a fairly
3 universal standard. I know the Ninth Circuit calls this a
4 particularly disfavored type of injunction. I think the
5 rationale in part is, you know, the injunction itself is such
6 an extraordinary relief to cause all parties to stop and
7 maintain the status quo.

8 In this particular case you have the University of Notre
9 Dame who has a fundamental interest in the integrity of its
10 process, how it's students are treated. Not just Mr. Doe, but
11 Ms. Roe, the complainant in this situation, as well as the
12 precedent it sets for future Mr. Does and Ms. Roes that come
13 forward at Notre Dame. Is their behavior somehow frozen
14 because the next thing they know they are going to end up in
15 federal court and have these decisions reviewed? That could be
16 a serious concern.

17 Notre Dame has created a very robust process. To not have
18 the opportunity to enforce its decision to dismiss a student
19 when multiple violations of its code of conduct have occurred I
20 think is a particularly troublesome thing in terms of the
21 extraordinary relief. Now we are going the extra step and
22 saying, not only, University of Notre Dame, do you have to
23 maintain some sort of status quo, but you have to affirmatively
24 allow the student back in to take exams or to graduate or what
25 have you. It is an additional layer of an order from this

1 Court. For that reason, I think the Seventh Circuit and other
2 circuits in this country consider this a particularly
3 disfavored type of injunction.

4 Starting from there, we go to the likelihood of success on
5 the merits. We know this is a very extraordinary relief. The
6 two claims that I have heard being brought are breach of
7 contract and Title IX as a basis for the injunction.

8 Particularly on the breach of contract claim, the case law
9 is very clear that there needs to be some sort of evidence of
10 bad faith, arbitrariness, capriciousness. I just happened to
11 start to read the *Brown University* case that opposing counsel
12 offered Your Honor. On page 2 it has a nice quote that I think
13 is quite telling. It says, "It is important to make
14 unequivocally clear at the outset that the Court's only role in
15 this case is to determine whether Doe's disciplinary process
16 was carried out in line with the plaintiff student's reasonable
17 expectations based on the policies in place at the time of
18 incident." It goes on to say, "It is not the Court's role to
19 determine the facts of what happened between the two
20 individuals' names to decide whether the Court would have in
21 the panel's position found the individual responsible for
22 sexual misconduct. This Court is not a super appeals court for
23 sexual misconduct cases." And I think that's in line with the
24 other cases that we've cited in our brief and, in fact, have
25 been cited by others.

1 This is a decision that is made in the culture, in the
2 tradition of University of Notre Dame. It sets high standards
3 for its students, and it does so for a reason because it is an
4 excellent university. It cares about the culture of its
5 campus. It cares about all its students, whether they are male
6 or female. It cares about its students whether they are
7 student athletes or not. It cares about its students whether
8 they are on student aid or whether they are wealthy. It does
9 not differentiate among those students. Instead it says, we,
10 under *du lac*, recognize that the University of Notre Dame and
11 its students will adhere to certain standards of conduct.

12 And as the case law indicates, it is the University of
13 Notre Dame's prerogative to adjudicate if those codes of
14 conduct have been violated.

15 I looked at these other cases involving procedures and
16 concerns about procedures, and my counterpart mentioned the
17 *Brandeis* case. *Brandeis* didn't even allow notice of the
18 charges to the student. *Brandeis* didn't even allow a hearing.
19 I think, Your Honor, will hear evidence from Mr. Willerton and
20 Ms. Ryan, the two people involved in this process, and just so
21 Your Honor knows, Ms. Ryan was involved, sort of, in the
22 investigatory process up until the point it gets referred on to
23 the office of -- to OCS, at which point the hearing and the
24 rest of the procedures follow under Mr. Willerton's
25 supervision.

1 So as Your Honor hears this evidence, I think the Court
2 will understand that there are, unlike *Brandeis*, unlike some of
3 these other cases, very robust procedures that the University
4 of Notre Dame follows. Every care, every step is taken to make
5 sure that both the complainant and the respondent, both Ms. Roe
6 and Mr. Doe, are fully aware of the procedures that they have
7 available to them. They have the opportunity to call
8 witnesses. They have the opportunity to submit documents.
9 They have the opportunity to review documents. They have the
10 opportunity to be heard. They have the opportunity -- they
11 actually had a hearing. They had the opportunity for a case
12 review, essentially an appeal, and a variety of other robust
13 processes before this decision of dismissal is ever carried
14 out. And Notre Dame applies those procedures equally among all
15 its students. It applies it to a freshman as much as to a
16 near-graduating senior.

17 I do not see a likelihood of success on the merits based
18 on the evidence I anticipate the Court will hear in terms of
19 the procedures that Notre Dame has adopted in *du lac* and the
20 procedures that were actually followed vis-a-vis these two
21 individuals.

22 On the Title IX front, the standard that seems to dominate
23 in the type of case that Mr. Doe is bringing is there needs to
24 be some sort of facts that create this articulable doubt about
25 the outcome. I think Your Honor will see evidence and has

1 already seen evidence of rather disturbing texts and other
2 evidence that was gleaned in the course of the hearing, and
3 this was about a six-hour hearing Notre Dame held with Mr. Doe
4 and Ms. Roe and other witnesses.

5 In those texts, including some statements at the hearing,
6 there's an admission that this is abusive. That's one, that's
7 one of the four standards within *du lac* that were --

8 **THE COURT:** That was his characterization of it.

9 **MR. LEICHTY:** He admitted it was abusive in the
10 course of a text. One of them -- we call them policy
11 questions. We don't call them charges. This is not a criminal
12 court in that sense. This is a process that is followed by
13 higher education with all the procedures of fairness that are
14 adopted within *du lac*. But one of those policy questions as
15 they call it was, did he commit abusive or harassing behavior?
16 That's one. He himself said this was abusive, and I think a
17 fair and objective reading of these texts indicate that it was,
18 in fact, abusive.

19 **THE COURT:** Can I interrupt you in that regard.

20 **MR. LEICHTY:** Sure.

21 **THE COURT:** Am I expected to hear today or be able to
22 read the other side of the text messages?

23 **MR. LEICHTY:** As I understand it, the --

24 **THE COURT:** Do we have now Jane Roe's responding
25 texts or --

1 **MR. LEICHTY:** We received those late yesterday after
2 the other side subpoenaed those, and I think they are rather
3 voluminous. Young kids these days, young college kids these
4 days, they use texts a lot. They are rather voluminous. I'm
5 not sure we have been through them all. But I'm sure to the
6 extent there is any of concern, the other side will raise
7 those.

8 For our part, we looked at a few. We have a few
9 additional ones that haven't been presented in our brief that
10 we would choose to present to Your Honor so that the Court can
11 consider those as well. I don't think we are going to reach
12 the point where there's some facts that create an articulable
13 doubt as to the outcome.

14 More than that, and this is probably perhaps the two
15 points --

16 **THE COURT:** You would have to concede that it is a
17 different kettle of fish when somebody is in an 18-month long
18 relationship or 15-month long relationship and there's this
19 persistent back and forth, if that's the case, if that's what
20 the evidence shows. That just strikes me as an entirely
21 different situation than somebody who is stalking somebody or
22 harassing them in the way that you might colloquially think
23 about it.

24 **MR. LEICHTY:** That is perhaps where this is very
25 different than a criminal court, Your Honor. This is the

1 University of Notre Dame where certain high standards are
2 expected, and the University of Notre Dame has that prerogative
3 to decide those standards. They set them out very clearly in
4 *du lac*. All students are oriented to those when they come on
5 as freshmen. They are aware of those and advised of those if
6 violations are committed. There is a full investigation.

7 I think given the extent of these text messages -- and
8 we'll hopefully have the opportunity to go through some of
9 these. I think given the repetitive nature of these, given the
10 indications from Ms. Roe that these are harassing, please stop,
11 and the fact that even Mr. Doe indicates that they are abusive,
12 I think there's sound evidence there, appreciating that the
13 Court isn't a, sort of, "super appeals court," in the words of
14 our opponent's case here, to decide those facts.

15 It is the prerogative of the hearing board to decide,
16 okay, do those facts rise to the level of this standard as it
17 is articulated in *du lac* given the culture we have created at
18 the University of Notre Dame?

19 In terms of the Title IX case, I think perhaps the easier
20 points, Your Honor, are the second and third part of the
21 standard. There has to be some sort of causal connection to
22 gender bias. There's no evidence of that. The University of
23 Notre Dame approaches its procedures within *du lac* whether the
24 individual is a man or whether it is a woman. Again, whether
25 they are rich, whether they are on student aid. Whether they

1 are a student athlete, whether they are not. These procedures
2 are applied equally to all, and it is not as though there will
3 be any evidence that indicates that the University of
4 Notre Dame, because of some gender bias, decided that Mr. Doe
5 was deserving of dismissal. It is not as though there will be
6 evidence that Notre Dame decided to dismiss Mr. Doe because he
7 was a male student. That's offensive to me based on my review
8 of this record. Notre Dame has, in fact, handled these
9 dismissals regardless of whether they are men or women when
10 they are as serious as they are in this case.

11 So I don't think there's a likelihood of success, whether
12 on the breach of contract claim or whether it is on the Title
13 IX claim. So I'm not sure we ever get to sort of this
14 balancing of harms or sliding scale because it is simply not
15 there.

16 One other thing I'll mention in terms of this disparate
17 treatment argument I heard, and I think Your Honor put the
18 Court's thumb right on it. The cases that I have read have
19 indicated that it is improper to evaluate the disparate
20 treatment case as between the current plaintiff, Mr. Doe here,
21 and the complainant, Ms. Roe, that was involved in the process.
22 Instead, what needs to be shown, is that there's a similarly
23 situated respondent who has in similar circumstances committed
24 comparable behavior who has not, in fact, been dismissed and,
25 in fact, a female.

1 That's not the situation -- that's not going to be any
2 record that's shown to the Court in preliminary injunction.
3 I've not seen any indication from the information that I have
4 reviewed.

5 **THE COURT:** But in the absence of a reverse complaint
6 by John Doe here that would assuredly be the case, but since he
7 also pressed a complaint against the original accuser Jane Roe,
8 why isn't that a fair comparative? How did you all approach
9 that complaint versus how did you approach the complaint from
10 Jane Roe? So that strikes me as a fair comparative, no?

11 **MR. LEICHTY:** Two responses, Your Honor. One, I
12 don't think that's consistent with how I read the law in terms
13 of what is proper comparative; but second --

14 **THE COURT:** Stop there because I don't think you are
15 addressing what I'm getting at. I think in those other cases
16 there isn't a come-back complaint. It is, you have an accuser
17 and you have an accused, and that's what the University is
18 looking at. And it is unimportant how they're treating the
19 accused in -- the accuser in that situation. And I understand
20 that, that's not a comparator. But when you actually have two
21 different processes where the accuser and the accused flip on
22 one another, that is an appropriate comparator. If in the one
23 they dust it under the rug and say, this is nonsense, we are
24 not going to open an investigation or whatever, then, I don't
25 know --

1 **MR. LEICHTY:** Perhaps I could make it easy for the
2 Court. My second response is: I think the Court will hear
3 evidence from Ms. Ryan and Mr. Willerton as -- Ms. Ryan in
4 particular as it concerns this complaint by Mr. Doe. His
5 complaint is being considered like any other complaint was
6 being considered. It is in the process --

7 **THE COURT:** When was that complaint lodged?

8 **MR. LEICHTY:** He lodged the complaint, as I
9 understand it, on April 5th and April 12th of 2017, and one
10 of his complaints, Your Honor --

11 **THE COURT:** I thought it was back in February that he
12 originally brought that complaint. Am I missing --

13 **MR. LEICHTY:** No, Your Honor, the actual formal
14 complaints were filed on April 5 and April 12. The one
15 complaint he had was that Ms. Roe had apparently intimidated
16 two witnesses. Within a day, University of Notre Dame had
17 reached out to those two witnesses to say, We need to talk with
18 you. Within the second day, University of Notre Dame had
19 interviewed one of those witnesses who had apparently been
20 intimidated, and that process is ongoing.

21 **THE COURT:** Okay.

22 **MR. LEICHTY:** It is not as though the University of
23 Notre Dame has said in response to Mr. Doe's complaint, We're
24 going to treat you completely differently. We're not going to
25 investigate these things. That's completely not the case.

1 **THE COURT:** Fair enough.

2 **MR. LEICHTY:** Instead, Notre Dame has pursued that
3 complaint in the same way.

4 Now, what I think preceded, and maybe this is what Your
5 Honor is recalling, what preceded Mr. Doe's complaints, formal
6 complaints in April, was an additional complaint by Ms. Roe.
7 Now, that complaint was not part of this initial process that
8 we're here today to fair it out because it came after the
9 administrative hearing, all that came after the process. She
10 filed an additional complaint. He's also now filed these April
11 policy questions. Those have been combined to evaluate are
12 there, in fact, policy questions that may concern Mr. Doe again
13 and/or Ms. Roe. But all those are being treated the same way
14 under the same procedures that Notre Dame has considered all
15 other complaints of this nature, Your Honor. So I think
16 factually Your Honor will hear evidence that indicates that's
17 really not a proper comparator at all, whether it is under the
18 law or factual.

19 The last couple points I'd make, Your Honor, really
20 concern this issue of irreparable harm and balancing. As I see
21 it, I see significant harm to the university if the Court takes
22 the extraordinary step of entering an affirmative junction that
23 orders this student back into campus. I'm concerned about the
24 integrity of the University of Notre Dame process, which is
25 otherwise robust and effective. I'm concerned about the effect

1 on future complainants, whether they are men or women, in terms
2 of the freezing nature that -- or the freezing effect this
3 would have if after such a robust process and determination is
4 made a policy question was, in fact, violated, or policy was
5 violated, and instead what happens is now we have rushed off to
6 federal court to review every one of these. That's not the
7 tenor of the law as I see it. We shouldn't be in that
8 situation every time a student is dismissed.

9 I'm also concerned about the effect that this has on
10 future participants, not just Ms. Roe here, but future
11 individuals who undergo the process here at Notre Dame. We
12 cited a couple cases in our brief, Your Honor, on this
13 irreparable harm issue, and I think they lessen the view of the
14 alleged harm to Mr. Doe when, in fact, we're talking about a
15 dismissal that has already happened, when we're talking about
16 this context of an affirmative injunction.

17 We cited the *University of Louisiana at Monroe* case and
18 the *Healthdyne* case which speaks to that issue, so I think we
19 are back to this notion that because they are seeking an
20 affirmative injunction there's particular scrutiny that's
21 placed even on the irreparable harm element.

22 At the end of the day, Your Honor, I think what the Court
23 will hear is that University of Notre Dame had a very robust
24 process. It applies that process fairly among all its
25 students, whether they are male or female, again, rich or poor,

1 student athlete or not. This is a procedure that is followed
2 robustly with respect to all. It is also a procedure that is
3 continually reviewed by the University of Notre Dame, and in
4 many ways they have been asked in conferences to present on
5 their model. There are other universities that use a very
6 different model, say, a single investigative model where there
7 isn't an opportunity for a hearing. In many ways --

8 **THE COURT:** This whole area --

9 **MR. LEICHTY:** They are the front of best practices,
10 Your Honor. They are asked to present on this. They are often
11 asked to consult about this. I think the University of Notre
12 Dame's processes are extremely robust, and I think the evidence
13 will bear that out, Your Honor, and that they follow those
14 procedures.

15 **THE COURT:** All right. I mean, this whole area does
16 seem to strike me -- I think, in fairness, it puts universities
17 in a very difficult situation. I mean, had they not done what
18 they did they could be subject to a lawsuit from the other
19 side; so I fully understand this is a difficult area for a
20 university to deal with. I appreciate what you are saying.

21 Okay. Thank you, sir.

22 **MR. LEICHTY:** Thank you, Your Honor.

23 **THE COURT:** Ms. Hamill, do you want to say anything
24 else in response just briefly?

25 **MS. HAMILL:** Very briefly, Your Honor.

1 **THE COURT:** Sure.

2 **MS. HAMILL:** Just a few points. First of all, Your
3 Honor, the affirmative injunction, a lot of those cases turn on
4 things like buildings being built or torn down. This is --
5 basically, this is on paper. It is not requiring some
6 extraordinary relief on behalf of the University, and we've
7 also made it very clear Mr. Doe's willing to make all
8 reasonable accommodations to make this happen and not dislocate
9 anyone unnecessarily. And we're really asking them to
10 enjoin -- we're asking you to enjoin the University from
11 imposing the effect of just a portion of the sanction.

12 Secondly, Your Honor, Mr. Leichty referenced only one of
13 the theories you can proceed on for Title IX, which is the
14 erroneous outcome; but there's also a theory called selective
15 enforcement, and that, without regard to the outcome, if a
16 university acts in such a way, is motivated by gender, to treat
17 a male -- in this case male respondent in a way either through
18 sanctioning or through the process in a way that shows bias,
19 that's another ground for recovery.

20 And the third thing is we understand -- we're not asking
21 you to sit here as a super panel and look at the texts and say
22 what would you have done. We're here to look at the
23 University's procedures to see whether they were fair and
24 equitable here. That's exactly why we're here.

25 **THE COURT:** As an aside, there's this third theory

1 under Title IX deal with deliberate indifference.

2 **MS. HAMILL:** Sure.

3 **THE COURT:** I can't get my mind around it. It seems
4 to be a square peg in a round hole in this case. Is that
5 right?

6 **MS. HAMILL:** It could actually have an application
7 here if we've got Mr. Doe making complaints to the school about
8 Ms. Roe's conduct throughout the course of this and they are
9 basically not doing anything about it, they are deliberately
10 indifferent. It is sort of the flip side of the disparate
11 treatment here. But it is more traditionally been lodged in
12 history by female complainants who have felt that their schools
13 haven't had an adequate ear and response to their complaints of
14 sexual misconduct or sexual assault.

15 But, again, this is an evolving area of the law so that
16 these theories are -- to use Mr. Leichty's words -- they are
17 robust. Courts are applying them in ways that are evolving as
18 we sit here today. But deliberate indifference could have --
19 the theory here would be that the university didn't respond to
20 Mr. Doe's complaints about how Ms. Roe was harassing him by
21 using this process in the no contact complaints that she was
22 making.

23 The other piece of this with gender bias, Mr. Leichty was
24 talking about the issue with gender bias, and the other aspect
25 of Title IX that I think we're very firmly in the foundation of

1 is the *Doe v. Columbia*, the Second Circuit case, where -- and
2 it is very similar to what's going on with Notre Dame that has
3 two open office for civil rights investigations. It had a past
4 investigation. It is the subject of this documentary, *The*
5 *Hunting Ground*, which is very critical of universities'
6 handling of complaints by female complainants of this
7 deliberate indifference, that universities haven't been
8 responsive. Notre Dame was one of the featured universities in
9 that documentary which was on CNN. It garnered a lot of
10 attention.

11 And *Doe v. Columbia* is very similar. The Court there,
12 this is the Second Circuit, said, and this is at page 12 of 14
13 of the Lexus printout, "As outlined above, the complaint
14 alleges that during the period preceding the disciplinary
15 hearing there was substantial criticism of the university, both
16 in the student body and in the public media, in accusing the
17 University of not taking seriously complaints of female
18 students alleging sexual assault by male students. It alleges
19 further that the University's administration was cognizant of
20 and sensitive to these criticisms to the point that the
21 president called a University-wide open meeting with the Dean
22 to discuss the issue against this factual background" -- which
23 is the same factual background we have here -- "It is entirely
24 plausible that the University's decision makers and its
25 investigator were motivated to favor the accusing female over

1 the accused male so as to protect themselves and the University
2 from accusations that they had failed to protect female
3 students from sexual assault." So we're squarely within that
4 case law with respect to the claims that we're bringing under
5 Title IX.

6 And then just finally, the disparate treatment piece here,
7 actually Mr. Doe, and we'll get into this, but made a formal
8 complaint on February 3. It wasn't in April. It was
9 February 3. They wanted to report a violation of the no
10 contact order which had occurred in January, January 31, and he
11 wanted -- he said, thank you for letting me report this, and
12 please confirm to me that this has been officially reported.
13 And it took the University another, like, 17 days before they
14 did anything about it, and that's part of the investigation
15 that's still pending today, which under their guidelines of a
16 60-day investigation, we're beyond that period at this point.
17 So it is not April. It is February.

18 That's all, Your Honor.

19 **THE COURT:** Okay.

20 **MS. HAMILL:** Thank you.

21 **THE COURT:** Can you have somebody run outside to see
22 if these young folks are here and --

23 **THE MARSHAL:** I think they are on their way up.

24 **THE COURT:** Okay. Thank you.

25 Noel, do you want to call me when --

1 (A recess was had at 9:37 a.m.)

2 (The following proceedings were held in open court
3 beginning at 9:52 a.m., reported as follows:)

4 **DEPUTY CLERK:** All rise.

5 **THE COURT:** You can be seated. All right. Everybody
6 ready to proceed?

7 **MR. GALLINARO:** Yes, Your Honor. We're calling a
8 student to the stand. I'm not going to use his name for
9 purposes of today.

10 Can he approach?

11 **THE COURT:** Sure. Come on forward, young man.

12 Good morning. Thanks for driving over this morning. I'm
13 sure you are busy. I need you to raise your right hand to take
14 an oath. This lady right here is going to swear you.

15 (The oath was administered.)

16 **THE WITNESS:** Yes.

17 **THE COURT:** You may be seated. All right. You may
18 proceed.

19 **DIRECT EXAMINATION**

20 **BY MR. GALLINARO:**

21 **Q.** Good morning.

22 **A.** Good morning.

23 **Q.** I understand it is awkward, but without using your name,
24 could you introduce yourself to the Court?

25 **A.** I am a senior at Notre Dame. I have known John since my

1 freshman year and Jane since my junior year.

2 **THE COURT:** Let me interrupt for a second. You all
3 know who this individual is?

4 **MR. LEICHTY:** We do, Your Honor.

5 **THE COURT:** Okay. Just so we're clear.

6 **MR. GALLINARO:** I made sure of that before.

7 **THE COURT:** Sure.

8 **MR. GALLINARO:** Thank you, Your Honor.

9 **BY MR. GALLINARO:**

10 **Q.** I am sure you are thrilled to be here this morning.

11 **A.** Absolutely.

12 **Q.** Are you aware that you have been asked to testify as a
13 witness for John Doe in his case against Notre Dame?

14 **A.** Yes.

15 **Q.** And are you aware of the identity of Jane Roe?

16 **A.** Yes.

17 **Q.** Okay. Are you aware that this case concerns a
18 disciplinary proceeding that was held by Notre Dame involving a
19 dispute between John Doe and Jane Roe?

20 **A.** Yes.

21 **Q.** Did there come a time when you had an occasion to
22 videotape Ms. Roe?

23 **A.** Yes.

24 **Q.** When, if you can recall, did you make this videotape?

25 **A.** February 12th.

1 Q. And if you can recall, was that before John had his
2 disciplinary hearing or after?

3 A. Can you repeat the question? Sorry.

4 Q. Sure. Did you know whether at the time you filmed it John
5 had already had his disciplinary proceeding or it had yet to
6 occur?

7 A. I don't believe so. I don't believe it occurred. I'm not
8 sure. I don't know.

9 Q. However, you didn't provide it to him before his
10 disciplinary proceeding?

11 A. No, I did not. I did not. I was not in possession of the
12 videos in the first place.

13 Q. Before I play the video --

14 **THE COURT:** Let me interrupt. I don't understand
15 your last answer. What do you mean you weren't in possession
16 of the video? I thought you said you were the one who shot it.

17 **THE WITNESS:** So I recorded the videos, but they were
18 not on my phone.

19 **THE COURT:** Did you record them on somebody else's
20 phone?

21 **THE WITNESS:** Yes.

22 **THE COURT:** Whose phone, the other student?

23 **THE WITNESS:** Yeah.

24 **THE COURT:** Not Jane Roe?

25 **THE WITNESS:** No.

1 **THE COURT:** Were you using that person's phone with
2 their permission?

3 **THE WITNESS:** Yes.

4 **THE COURT:** I see. And why did you do that?

5 **THE WITNESS:** So it was -- the girl who handed me her
6 phone suggested that I record it so that we were protected
7 against anything that would have happened that night, so there
8 was a concern of any sort of accusations being made against us,
9 false accusations specifically, and so in order to protect
10 ourselves we recorded our interactions with Jane that night.

11 **THE COURT:** Are you going to get into the context of
12 how this -- where they were?

13 **MR. GALLINARO:** Yeah, I was going to ask him.

14 **THE COURT:** Okay.

15 **BY MR. GALLINARO:**

16 **Q.** I'll play the video in a moment, but could you just
17 describe the night on which you took them and just the
18 circumstances in which it occurred.

19 **A.** Sure. Jane and a mutual friend of us two were drinking
20 and out at some bars, and eventually they made their way over
21 to my place of residence where I was. And this eventually --
22 the night progressed to where my -- the mutual friend and
23 myself walked Jane back to her place of residence, and at that
24 time we were concerned about, just like I said previously, the
25 accusations that could have been made. And so we, in order to

1 protect ourselves, were filming our interactions with her.

2 Q. What about her actions made you concerned that evening?

3 A. She was clearly drunk and not in the best state of mind.
4 She was very agitated that night. She was very upset. And so
5 in order to protect ourselves, we recorded her.

6 Q. With Your Honor's permission, I'll --

7 THE COURT: Can I just follow up?

8 MR. GALLINARO: Sure. Go ahead, Your Honor.

9 THE COURT: What do you mean? Why did you feel the
10 need to protect yourself? Protect yourself from what?

11 THE WITNESS: So it was my understanding that there
12 were false accusations made from her, and I did not want any
13 false accusations made against myself and nor did the other
14 person, the person -- the girl that handed me her phone. And
15 so in order to ensure --

16 THE COURT: Why did you invite her back to your
17 apartment?

18 THE WITNESS: So they -- Jane called me off of the
19 friend's phone that night.

20 THE COURT: Okay.

21 THE WITNESS: She said, you need to come pick us up.
22 I said, I can't because I've been drinking. I shouldn't
23 drive.

24 Then she said, okay, we'll come over there, to where I
25 was. And eventually she -- I could tell that my friend was

1 upset to be around her and -- because she was clearly drunk and
2 agitated. And so we separated the two of them. I had a friend
3 take my friend, and I spoke to XXXXX -- or Jane --

4 **THE COURT:** It is okay.

5 **THE WITNESS:** And -- sorry. That kind of -- I was
6 speaking to her for about 20 to 30 minutes in view of the
7 security camera, and then --

8 **THE COURT:** This is inside a bar somewhere?

9 **THE WITNESS:** No, this is where I live. They come to
10 my place.

11 **THE COURT:** I see.

12 **THE WITNESS:** My friend -- the mutual friend is upset
13 with Jane. We separate them. I have a friend take my friend
14 away from Jane, and I'm speaking to just Jane alone. This is
15 in view of a security camera outside, like -- it is in a
16 stairwell.

17 **THE COURT:** Okay.

18 **THE WITNESS:** So there's a security camera because it
19 is facing the entrance to the building. We spoke for about 20
20 to 30 minutes, and she was upset about everything that was
21 going on with the hearing and with John. And so after we had
22 our conversation where I was continually trying to calm her
23 down, we found our -- the other friend and then decided to take
24 Jane home. And then somewhere around that point of taking her
25 home, we decided to videotape what our interactions were. We

1 brought her up to her room, and --

2 **THE COURT:** Does she live on campus or off campus?

3 **THE WITNESS:** She lives off campus. She lives one
4 housing development adjacent to mine, so it was a two-minute
5 walk at worst.

6 We were recording, and then we were walking out of her
7 floor. But you need to key in to the floor. There's a lock --
8 not like a lock, but you need to have your key to get into the
9 floor. And so as we were walking out, she didn't bring her key
10 with her; and so she was locked out of her floor. And then
11 that's gonna be the context of these videos where we're in the
12 stairwell.

13 **THE COURT:** Okay. That's very helpful.

14 **THE WITNESS:** Okay.

15 **THE COURT:** I wanted to ask one other question, maybe
16 it will show on the video, but is she kind of out-of-her-mind
17 drunk or just kind of, you know, tipsy, if you can in some way
18 characterize it.

19 **THE WITNESS:** I would say not tipsy but not blackout
20 drunk, somewhere in between.

21 **THE COURT:** Okay. All right. Sorry.

22 **MR. GALLINARO:** With Your Honor's permission?

23 **THE COURT:** Yeah, you bet.

24 **MR. GALLINARO:** With technology you never know.

25 There's two. I'm just going to play them back-to-back.

1 **THE COURT:** Before you do that --
2 Could you turn that off for just one second.
3 Denise, would you mind -- is it cut off for the courtroom?
4 Okay. That's fine.
5 Go ahead. I just wanted to make sure the courtroom one
6 wasn't on.
7 (Videos were played.)
8 **BY MR. GALLINARO:**
9 **Q.** We just watched two video clips. Are those the video
10 clips that you took?
11 **A.** Yes.
12 **Q.** Who was Jane referring to in the videos?
13 **A.** John Doe.
14 **Q.** How do you know?
15 **A.** In the first one she says his name, and in the second one
16 she had been making similar comments about him the entire
17 night.
18 **Q.** Did you at some point provide this video to John to make
19 use of in his academic disciplinary proceedings?
20 **A.** I did not provide them to John. I did not have -- I did
21 not have possession of the videos.
22 **Q.** How was it your understanding that he came into their
23 possession then?
24 **A.** The girl whose phone it was sent it to John.
25 **Q.** Do you know about when she sent it?

1 A. I know it was after -- I think it was after the hearing.
2 I'm not totally sure.

3 Q. Thank you. Those are all the questions I have.

4 THE COURT: Thank you, sir.

5 Cross.

6 MR. LEICHTY: Thank you, Your Honor.

7 CROSS-EXAMINATION

8 BY MR. LEICHTY:

9 Q. Sir, good morning.

10 A. Good morning.

11 Q. I represent the University of Notre Dame. I have just a
12 few questions for you.

13 You mentioned that you were with Ms. Roe and this other
14 woman that we see in the video drinking before the videos were
15 actually taken, right?

16 A. I was not drinking with them.

17 Q. You were not drinking?

18 A. No.

19 Q. Had you had anything to drink that night?

20 A. I had that night, but I was not drinking with them.

21 Q. How much had you had to drink that night?

22 A. I don't have a number, but enough to where I didn't feel
23 comfortable driving but not enough to where I was incoherent.

24 Q. So somewhere between tipsy and blackout then?

25 A. Sure.

1 Q. All right. And how long after you had been drinking were
2 these particular videos taken?

3 A. I would say approximately at least an hour-and-a-half to
4 two hours after my last drink.

5 Q. Okay. And how long were you with Ms. Roe and the other
6 woman that we see in the videos?

7 A. I would say approximately two to three hours.

8 Q. Okay. And you were obviously concerned about being
9 protected so that Ms. Roe didn't make any accusations against
10 you or the other woman that was with you, correct?

11 A. Yes.

12 Q. Okay. So you filmed the entire two to three hours that
13 you were with her?

14 A. No.

15 Q. Oh.

16 A. Not the entire two to three hours, no.

17 Q. If you were concerned about the accusations that might be
18 made against you, why didn't you film the other two-to-three
19 hour encounter that you had with Ms. Roe?

20 A. So when I was originally speaking to her, I knew that the
21 position that I was in was covered by a security camera, so
22 there was no reason for me to make my own video recording.
23 When we were in the hall of where I live, there's also another
24 security camera. So just about every interaction that I had
25 with her, the other girl was present for, and there's a chunk

1 of it where it was also covered by our own videotapes.

2 Q. Were you concerned about protecting yourself from some
3 sort of physical accusation or oral accusation?

4 A. As in I assaulted her or something?

5 Q. Yes, sir.

6 A. I was just concerned in general. I don't think that there
7 was a specific thing I was concerned about, but I just wanted
8 to make sure that I was completely protected.

9 Q. These other two security cameras that you mentioned, they
10 don't have audio, do they?

11 A. I don't know.

12 Q. You presume they would just have video, right?

13 A. I am certain they have video. I don't know about audio.

14 Q. Okay. Did you take any other video other than the two
15 clips that we've seen here?

16 A. I did.

17 Q. And how much video did you take in addition to the two
18 clips we see here?

19 A. It is tough to say. They were not on my phone. I don't
20 know, but more than those clips. I don't have a specific
21 number of minutes or clips.

22 Q. Can you give me some sort of estimate as to how much video
23 you took?

24 A. About 30 minutes. I'm really not sure.

25 Q. Okay. Because we see in the second video about 12

1 seconds.

2 A. Right.

3 Q. Do you still have possession or do you know if someone
4 else has possession of the other approximate 30 minutes of
5 video you took?

6 A. Part of it, yes.

7 Q. Let me ask this in a way that I don't elicit a name here.
8 The other woman that we see in the video aside from Ms. Roe,
9 was it her phone --

10 A. Yes.

11 Q. -- you had used?

12 Does she have possession of this other approximate 30
13 minutes of video?

14 A. As far as I know, no.

15 Q. As far as you know?

16 A. No.

17 Q. Is there some other individual at either University of
18 Notre Dame or St. Mary's that has possession of that 30 minutes
19 of video?

20 A. She sent some of the clips to me.

21 Q. When you say "she," who are you referring to?

22 A. The girl whose phone it was on.

23 Q. The one would we see in the video?

24 A. Yes.

25 Q. The one we would see in the video is a former girlfriend

1 of yours, right?

2 A. Yes.

3 Q. Were you the individual who provided those two clips to
4 Mr. Doe?

5 A. I was not.

6 Q. Who provided those clips to Mr. Doe?

7 A. The girl whose phone they were on.

8 Q. Did you have a discussion with her as to which clips to
9 provide him?

10 A. Somewhat.

11 Q. So you had somewhat of a discussion with your former
12 girlfriend as to which clips out of this approximate 30 minutes
13 to provide to Mr. Doe, right?

14 A. Could you repeat the question? Sorry.

15 Q. Sure. You had a conversation with your former girlfriend,
16 who is pictured in this video, as to which clips should be
17 provided to Mr. Doe out of the approximate 30 minutes of video
18 that you took, correct?

19 A. Yes.

20 Q. And you selected those based on -- what I see in these two
21 videos is there's two separate clips. Why did you decide to
22 provide those two separate clips?

23 A. That was done because some of the other conversation that
24 night was sensitive to the other girl in the video, and she did
25 not feel comfortable sending that sort of information to John.

1 Q. And without getting into the details of that sensitive
2 conversation too deeply, you are aware that she had had an
3 incident with another student, right?

4 A. Very aware, yes.

5 Q. And it was a serious incident, right?

6 A. Yes.

7 Q. Would you be able to characterize it as a potential Title
8 IX incident? You understand what that is?

9 A. It was sexual assault.

10 Q. Okay. And so there was a discussion that night with you
11 and the two women that are in the video, Ms. Roe and your
12 former girlfriend, about her concern with respect to this other
13 student, correct?

14 A. Sorry. One more time, please.

15 Q. Sure. There was a discussion among the three of you about
16 your former girlfriend's incident with this other student,
17 right?

18 A. Yes.

19 Q. Both of the girls in the video were upset about what had
20 transpired with him and your former girlfriend, correct?

21 A. Yes.

22 Q. I know in the second clip, sir, that there's a reference
23 by Ms. Roe to both St. Mary's and Notre Dame, right?

24 A. Correct.

25 Q. Ms. Roe is a student at Notre Dame, right?

1 A. Yes.

2 Q. You, of course, were a student at Notre Dame?

3 A. Yes.

4 Q. The other woman in the video is a student at St. Mary's?

5 A. Yes.

6 Q. So are you aware of whether Ms. Roe in talking about the
7 unspoken individual's name in the second clip -- she doesn't
8 mention anybody's name in the second clip -- are you aware of
9 whether she's referring to Mr. Doe or actually the man who was
10 dating a St. Mary's student? Are you able to say one way or
11 the other?

12 A. I'm sorry, the man that was dating the St. Mary's student?

13 Q. When Ms. Roe talks about this gentleman's reputation, who
14 she doesn't identify in the second clip, and talks about his
15 reputation both at Notre Dame and St. Mary's, are you sure
16 whether or not she was referring to Mr. Doe or, in fact, the
17 individual that was involved in the incident with your former
18 girlfriend?

19 A. There's no name said, no.

20 Q. Okay. You are not sure which person she's referring to,
21 whether that's Mr. Doe or the individual who was involved in
22 the incident with your former girlfriend, correct?

23 A. I cannot say definitively, no.

24 Q. Thank you.

25 **THE COURT:** Any redirect?

1 **REDIRECT EXAMINATION**

2 **BY MR. GALLINARO:**

3 **Q.** Do you know -- can you place for us how close in time
4 those two clips happened?

5 **A.** Given that they were both in the stairwell, a maximum,
6 absolute maximum of 45 minutes; but I don't know the exact
7 time.

8 **Q.** So you can't say one way or the other whether it was,
9 like, recording stopped, recording started, right back to back?

10 **A.** I can't answer that. I don't know.

11 **Q.** Okay. Earlier in my questioning I asked you whether you
12 thought she was referring to John Doe. You said, yes. A
13 minute ago you said something a little different.

14 Was she -- what were her discussions that night that led
15 you to believe that she was speaking about Mr. Doe?

16 **A.** She was saying similar things about him that night. I
17 answered that I could not definitively say it was him because
18 his name wasn't used, but based off of the conversations that
19 night, it was apparent to me that she was referring to John.

20 **Q.** Did she make statements like that about the other person?

21 **A.** I don't recall.

22 **Q.** In terms of if you could assess or put a number on your
23 certainty about who she was referring to, where would you
24 ballpark that for us?

25 **MR. LEICHTY:** Objection. Speculation.

1 **THE COURT:** I think that's a fair lay opinion
2 rationally based on his perception, so it is overruled.

3 Give us a sense for how sure you are that she's referring
4 to John Doe as opposed to this other person involved in this
5 alleged assault.

6 **THE WITNESS:** I'm pretty certain.

7 **THE COURT:** All right.

8 **MR. GALLINARO:** Thank you.

9 **THE COURT:** Do you have anything else?

10 **MR. LEICHTY:** No, Your Honor.

11 **THE COURT:** All right. Thank you.

12 **THE WITNESS:** Thank you, Your Honor.

13 **THE COURT:** Does anybody have any intention to recall
14 this gentleman?

15 **MR. LEICHTY:** No, Your Honor.

16 **THE COURT:** You are released from your subpoena, and
17 you are free to go. Thank you.

18 **THE WITNESS:** Thank you.

19 **THE COURT:** Good luck to you.

20 **THE WITNESS:** Thank you.

21 **MR. LEICHTY:** Your Honor, to the extent it helps,
22 Ms. Heather Ryan has arrived. We would have to take a short
23 break to get her situated and coordinated if, in fact, we want
24 to do that.

25 **MS. HAMILL:** We'll do the student.

1 **THE COURT:** Do we want to close the circle on this
2 part of their --

3 **MR. LEICHTY:** Sure. I just wanted to make the offer.

4 **THE COURT:** Sir, come on forward. Good morning. I
5 need you to raise your right hand to take an oath.

6 (The oath was administered.)

7 **THE WITNESS:** I do.

8 **THE COURT:** All right. You may be seated. Make sure
9 you speak right into the microphone so I can hear you.

10 Mr. Gallinaro, you may proceed.

11 **MR. GALLINARO:** Thank you, Your Honor.

12 **DIRECT EXAMINATION**

13 **BY MR. GALLINARO:**

14 **Q.** Good morning, sir.

15 **A.** Good morning.

16 **Q.** Understanding it is awkward, and if you could do your best
17 to refrain from using names, could you introduce yourself to
18 the Court.

19 **A.** Yes. I'm a senior at the University of Notre Dame. I
20 have known John since my freshman year, fall of 2013, and I
21 have known Jane since the end of my sophomore year, spring of
22 2015.

23 **THE COURT:** Is Jane a junior or senior?

24 **THE WITNESS:** Jane is a senior.

25 **THE COURT:** This year. Okay.

1 BY MR. GALLINARO:

2 Q. Are you aware you have been asked to testify here in a
3 case that John has brought against the University of Notre
4 Dame?

5 A. Yes.

6 Q. Are you aware that the case concerns a disciplinary
7 proceeding that occurred at Notre Dame between Jane Roe and
8 John Doe?

9 A. Yes.

10 Q. Were you aware that in the fall of 2016 Jane Roe had
11 obtained a no contact order from the University against
12 John Doe?

13 A. Yes.

14 Q. Did you ever observe any instance in which Jane had
15 claimed that he violated that order?

16 A. Yes.

17 Q. First, can you tell me when that occurred?

18 A. I don't know the exact date, but I believe it was sometime
19 in January. John and I were waiting for a class to begin in
20 DeBartolo Hall. We were on the third floor just sitting on a
21 bench talking, and I was doing some homework. And XXXXXXXX had
22 happened -- Jane had happened to walk by without us even really
23 taking notice of it. And that was the complete interaction,
24 and I was -- I went to class, got a couple frantic texts from
25 John saying -- asking me if I could come out into the hallway

1 real quick. Went out into the hallway and saw that John was
2 talking to a police officer. Went over and was told that Jane
3 had accused John of breaking the no contact order, and I told
4 the officer exactly what happened, that we were just sitting
5 there talking. I was doing some homework, and that we hadn't
6 really even noticed that she walked by.

7 Q. Did John have a reason to be on that bench with you in
8 that particular place in the building that day?

9 A. Yes. We both had class in the same hallway just down the
10 hall.

11 Q. Did you have any understanding of how the police officer
12 had obtained Mr. Doe from his classroom?

13 A. Yes. John was removed from his class. I believe the
14 officer went in and asked for him by name.

15 Q. Did he do anything to seek out Jane that day that you are
16 aware of?

17 A. No.

18 Q. Did he know she was going to walk by, to the best of your
19 knowledge?

20 A. To the best of my knowledge, no.

21 Q. Did he interact with her in any way when she walked by?

22 A. No.

23 Q. I want to just change gears now.

24 **THE COURT:** Can I interrupt for a second.

25 **MR. GALLINARO:** Sure.

1 **THE COURT:** You may have said this, but when did this
2 take place? This is in February?

3 **THE WITNESS:** I believe it was January.

4 **THE COURT:** Okay. In January.

5 **THE WITNESS:** Yes.

6 **THE COURT:** Before the hearing that John had?

7 **THE WITNESS:** Yes, this was prior to the hearing.

8 **THE COURT:** Okay. Thank you.

9 **BY MR. GALLINARO:**

10 **Q.** Was it close to the end of the month, if you recall?

11 **A.** I believe so.

12 **Q.** Did John ever ask you to testify at his administrative
13 hearing?

14 **A.** Yes, he had asked me to be a witness.

15 **Q.** Did you agree to do that?

16 **A.** I did.

17 **Q.** Were you able to do that?

18 **A.** No, I was not.

19 **Q.** Why not?

20 **A.** I was catching a plane to fly home on the day of the
21 hearing.

22 **Q.** Okay. Did you have -- did you communicate with the school
23 about your ability to participate in the hearing?

24 **A.** I communicated with someone from the Office of Community
25 Standards, told them that, unfortunately, I would be catching a

1 plane later that day and wouldn't be able to make the hearing
2 but that I would be happy to help in any way possible.

3 **MR. GALLINARO:** Your Honor, I should have done this
4 in advance. I have an e-mail that this student provided for
5 me. Can I put it on the ELMO?

6 **THE COURT:** Sure. Of course.

7 **MR. GALLINARO:** Does that happen automatically?

8 **THE COURT:** Yes. It should pop up there.

9 **MR. GALLINARO:** I showed this to counsel. I blacked
10 out the names. My name is the name at the top just to avoid
11 any confusion.

12 **BY MR. GALLINARO:**

13 **Q.** Sir, could you identify this document for us?

14 **A.** Yes. This is the e-mail I sent.

15 **Q.** And -- sorry. Who are you e-mailing?

16 **A.** I'm e-mailing Amber Monroe.

17 **Q.** If you could, could you just read your e-mail and her
18 response?

19 **A.** Yes.

20 "Hi. I am responding to my invitation to be a witness at
21 the hearing next Friday" --

22 **THE COURT:** Just make sure you don't identify these
23 folks when you are reading it.

24 **BY THE WITNESS:**

25 **A.** -- "next Friday, February 24th, for an incident between

1 John and Jane. Unfortunately, I will be in Chicago catching a
2 plane to fly home for the weekend, so I will not be able to
3 attend the hearing. Please let me know if there is anything I
4 can do to help in this matter. Best, myself."

5 Q. Could you read her response please.

6 A. Yes. Amber responded, "Hello. Thank you for the
7 notification. Nothing further is needed at this time.
8 Sincerely, Amber."

9 Q. Did anyone ever tell you that you could participate by
10 phone in the hearing?

11 A. John had talked to me saying that I might be able to
12 participate over the phone, yes.

13 Q. Did the school ever provide that accommodation to you?

14 A. The school never reached out, no.

15 Q. Would you have? If you had the opportunity, would you
16 have been able to participate by phone?

17 A. Yes, I believe so.

18 Q. Would you have done so?

19 A. Yes.

20 MR. GALLINARO: Thank you, Your Honor. I don't have
21 anymore questions.

22 THE COURT: What was it that you were going to add to
23 the story? Is it essentially what you related to us here in
24 court today had you testified at the hearing?

25 THE WITNESS: Yes.

1 **THE COURT:** Okay. Do you have any additional
2 information beyond that as it relates to the back and forth
3 between these two individuals?

4 **THE WITNESS:** I would say this is the main case when
5 I was involved.

6 **THE COURT:** Okay. Fair enough.

7 All right. Mr. Leichty, cross?

8 **CROSS-EXAMINATION**

9 **BY MR. LEICHTY:**

10 **Q.** Sir, good morning. My name is Damon Leichty. I represent
11 the University of Notre Dame.

12 I understand your primary knowledge is about this incident
13 outside the classroom in the hallway, correct?

14 **A.** Yes.

15 **Q.** Okay. You are aware that University of Notre Dame never
16 raised a policy question as it concerns Mr. Doe about a
17 violation of the no contact order, right?

18 **A.** Okay.

19 **Q.** Are you aware of that?

20 **A.** Yes.

21 **Q.** Okay. And you are aware that there was no finding by the
22 University of Notre Dame that Mr. Doe had violated any no
23 contact order? You are aware of that?

24 **A.** Yes.

25 **Q.** And you are aware that was not a policy question that was

1 raised for Mr. Doe's administrative hearing, right?

2 **A.** Yes.

3 **Q.** Now, you mentioned that Mr. John Doe had reached out to
4 you to let you know that you could participate by phone, right?

5 **A.** Yes.

6 **Q.** Okay. You didn't make that request of OCS, did you?

7 **A.** I did not formally request it, no.

8 **MR. LEICHTY:** Thank you.

9 **THE COURT:** Mr. Gallinaro, anything else?

10 **MR. GALLINARO:** Nothing further, Your Honor.

11 **THE COURT:** All right. Sir, thank you. Appreciate
12 you coming over. Good luck to you.

13 **THE WITNESS:** Thank you, Judge.

14 **THE COURT:** Okay. Do you want to take a little --
15 just a little brief time so he can meet with his witness before
16 you call her as an adverse witness here? So why don't we take
17 a 15-minute break at this time and give you a chance to do
18 that.

19 **MR. LEICHTY:** Thank you.

20 **THE COURT:** By the way, are you going to offer that
21 videotape into evidence at some point? You might want to do
22 that.

23 **MS. HAMILL:** Yeah, part of it is the whole
24 confidentiality.

25 **THE COURT:** The logistics of it?

1 MS. HAMILL: -- and logistics of not having --

2 THE COURT: We'll deal with that later, but I just
3 want to make sure it gets formally offered.

4 MS. HAMILL: Sure.

5 (A recess was had at 10:25 a.m.)

6 (The following proceedings were held in open court
7 beginning at 10:41 a.m., reported as follows:)

8 DEPUTY CLERK: All rise.

9 THE COURT: You can be seated.

10 Mr. Agostino, you may call your next witness.

11 MR. AGOSTINO: Thank you, Your Honor. The plaintiff
12 calls Heather Ryan.

13 THE COURT: Ms. Ryan, you can come forward. Good
14 morning, ma'am. If you would, please raise your right hand to
15 take an oath.

16 (The oath was administered.)

17 THE WITNESS: I do.

18 THE COURT: You may be seated. Just make sure you
19 speak right into the microphone so everybody can hear you.

20 HEATHER RYAN, PLAINTIFF WITNESS, SWORN

21 DIRECT EXAMINATION

22 BY MR. AGOSTINO:

23 Q. Good morning, Ms. Ryan.

24 A. Good morning.

25 Q. You are the Title IX -- Deputy Title IX Coordinator for

1 the University of Notre Dame?

2 **A.** Yes.

3 **THE COURT:** Can we just have you state your name on
4 the record here?

5 **THE WITNESS:** Sure. I'm Heather Ryan.

6 **MR. AGOSTINO:** I apologize, Your Honor.

7 **BY MR. AGOSTINO:**

8 **Q.** As the Title IX Deputy Coordinator, what are your duties?

9 **A.** As Deputy Title IX Coordinator, I administer the
10 administration of process related to students who are making
11 allegations and responding to allegations related to sexual
12 harassment sort of as an umbrella. So that would include
13 sexual assault, nonconsensual contact, dating violence,
14 domestic violence, stalking, and other conduct of that nature.

15 **Q.** So your job then is predominantly or totally processing
16 claims under Title IX?

17 **A.** It is predominantly. I mean, almost solely.

18 **Q.** Okay. And what in the chain of command or organizational
19 chart of the university, what relationship do you have to Matt
20 Lahey who is at the table here?

21 **A.** Matt Lahey is general counsel. I work in a department,
22 and he works with us in terms of counsel for Title IX affairs.

23 **Q.** Okay. He counsels you and the people in your office on
24 Title IX affairs?

25 **A.** He works with the Division of Student Affairs as well as I

1 believe other areas on campus. I don't want to speculate too
2 broadly on that.

3 **Q.** Okay. And he gets to participate or observe the hearings,
4 is that true?

5 **A.** That's not completely true. That's happened on a couple
6 of occasions, as I understand, but I would have to contact --
7 the Office of Community Standards would be able to answer that
8 more than I would.

9 **THE COURT:** I'm going to need you to slow down.

10 **THE WITNESS:** Okay.

11 **THE COURT:** I'm having actually a hard time
12 processing, so if you could.

13 **THE WITNESS:** Sure. No problem.

14 **BY MR. AGOSTINO:**

15 **Q.** Do you know what determines when Mr. Lahey as general
16 counsel or associate general counsel for the University sits in
17 on administrative review hearings on these Title IX cases?

18 **A.** No. Actually, I don't participate in that decision making
19 at all.

20 **Q.** Okay. Your job then is to decide whether or not when a
21 student comes to you what the next step is?

22 **A.** Yes, that's accurate.

23 **Q.** Okay. And do you have before you the document I just
24 placed up?

25 **A.** I do.

1 Q. Okay. This is downloaded from the web page for Notre
2 Dame, and it shows you in a -- you're listed there on the
3 second column, is that correct?

4 A. That's accurate, yes.

5 Q. Deputy Title IX Program Coordinator, correct?

6 A. Yes.

7 Q. And then the person right above you is who?

8 A. That's listed as Sue Steibe-Pasalich.

9 Q. Does this organizational chart apply to you, or do you --
10 I don't see the Title IX Coordinator listed on this chart?

11 A. This chart shows the sort of -- sorry. It got larger
12 there for a minute. Thank you. That helps.

13 It shows sort of the reporting structure within the
14 Division of Student Affairs.

15 Q. Okay. Is that a different division -- or do you operate
16 solely in that division, or do you operate in some other
17 division?

18 A. I work within the Division of Student Affairs, and there's
19 sort of a dotted line for a Title IX Coordinator at the
20 University.

21 Q. There's a what?

22 A. I work very closely with Title IX Coordinator
23 Karrah Miller who's not listed on this chart because this is
24 specifically the Division of Student Affairs, as I understand
25 it.

1 Q. Does she have any role with respect to whether or not
2 student complaints get passed along for further investigation?

3 A. At this point, no. I make decisions about that.

4 Q. Okay. And how long have you made those decisions?

5 A. For 18 months.

6 Q. Before you started making those decisions, who made those
7 decisions?

8 A. The former Deputy Title IX Coordinator, Melissa Madden
9 Lindley.

10 Q. Now, in deciding what complaints get moved along, my
11 understanding of the process is that complaints can come to you
12 in any number of ways through some type of help line Notre Dame
13 has or complaint line?

14 A. There are lots of different ways that we receive
15 complaints. Those are from individuals might contact me
16 directly. They might contact third parties who are staff
17 members or what have you. They might be referred by Notre Dame
18 Security Police or other folks. Lots of different ways.

19 Q. Your process is you gather some information from that
20 person, usually try to meet with them, right?

21 A. That is accurate, yes.

22 Q. And then you make a determination based on that meeting
23 whether you go further or not?

24 A. Once I meet with that complainant, I actually sit down and
25 try to learn more about the allegations and learn if they are

1 related to the area that I work with with Title IX, yes.

2 Q. Okay. And what do you do to familiarize yourself with
3 more information?

4 A. I ask them a couple of questions about what happened, and
5 they have the option to participate and share as much
6 information as they want, but they can decline to answer
7 questions as well.

8 Q. Beyond communicating with the person that comes to speak
9 with you -- which is a student, right?

10 A. Typically, yes.

11 Q. Okay. Beyond talking to that student, what do you do?

12 A. Actually, the initial report could just be from the
13 student. It might not have additional materials.

14 Q. Do you close the file right away sometimes?

15 A. If a -- there are a couple of different ways. Maybe I can
16 educate you on our process. Would that be helpful in terms of
17 how we do that?

18 Q. Sure.

19 A. When we talk about taking an initial report from a
20 student, then the complainant, so that's what we would use, the
21 term we would use, they have the opportunity to share as much
22 information as they want. So if we have information about who
23 the respondent is, they can either request that it go to an
24 investigation or request that it not go to an investigation.
25 And so that's sort of the decision point about where the next

1 steps would go.

2 **THE COURT:** But that's a decision that they make?

3 **THE WITNESS:** Yes. If the behavior could possibly be
4 a violation of any of those policies that I shared earlier,
5 then that would be the -- then I would give them that option to
6 pursue that.

7 **THE COURT:** What if you had a situation where on the
8 face of it it appears to you to be very egregious but the
9 complainant, after talking with you, says, you know what, I
10 don't want to get involved in this. Does that end the matter?

11 **THE WITNESS:** It doesn't. And so if we have
12 information about the respondent, and then -- if they request
13 that it not go forward, we have a tripartite process before an
14 investigation. And so they can request that it not go forward,
15 but we have three administrators who look at that information
16 to determine if a couple of factors are present.

17 **THE COURT:** Got it. Okay.

18 **BY MR. AGOSTINO:**

19 **Q.** And, in fact, in this particular case with Jane Roe, she,
20 after coming to you initially, she did request the possibility
21 of not going forward, is that correct?

22 **A.** That's accurate, yes.

23 **Q.** You did refer the matter to a tripartite board, is that
24 correct?

25 **A.** Yes.

1 Q. Who sits on that board?

2 A. We have three administrators within the Division of
3 Student Affairs. They are Dr. Bill Stackman, Associate Vice
4 President for Student Services; Brian Coughlin, Associate Vice
5 President for Student Development, and Heather Rakoczy Russell,
6 Executive Vice President for Residential Life.

7 Q. Okay. And were these the three administrators that you
8 referred Jane Roe's case to?

9 A. Yes.

10 Q. This was in October of 2016, correct?

11 A. Yes. Uh-huh.

12 Q. And they -- how does that process work? Do you forward an
13 e-mail? Do you talk to them? Do you do a memo to them?

14 A. I share information with them, and then I actually sit
15 down and meet with them and talk about the case and what
16 information I received. And then we talk about the factors
17 present.

18 Q. Okay. And in this case, the tripartite board agreed that
19 she could wait to report later if she wanted to, or it didn't
20 have to move forward?

21 A. Yes. Standard practice, the factors that they consider
22 are if the respondent has a history that we are aware of; if
23 there are -- if it is a location of some sort that may have a
24 history; if there's threats of future violence, sexual or
25 nonsexual in nature; if weapons are involved; or if that person

1 was a minor; and then also, like, other University concerns.
2 And so at that time it was determined that it did not meet that
3 criteria.

4 Q. Okay. So in this particular case then, based on your
5 understanding of the process and also your interaction with the
6 tripartite board in this case with respect to Jane Roe's
7 complaint in October of 2016, there was no history to
8 substantiate moving forward independently?

9 A. For clarification, when we say, "history," it means
10 reports to the University.

11 Q. Right.

12 A. So we had no prior reports to the University.

13 Q. Okay.

14 A. In terms of the point of the tripartite piece is to give
15 the complainant agency in the process to they can actually,
16 sort of, make some decisions about that, so that's the purpose
17 of that.

18 Q. And there were no threats of sexual assault, physical
19 assault that were of concern?

20 A. Not that I'm aware of at that time, no.

21 Q. All right. And then I think you mentioned other
22 University concerns and there was a fourth factor I think.

23 A. I mentioned several, so the first factor was the
24 respondent history, so that would mean reporting to the
25 University of a concern that we would be aware of. The other

1 factors included, sort of, the location or a group of people
2 being involved repeatedly in an action; violence or future
3 threats of violence, of sexual violence, or other violence; and
4 then use of a weapon; the complainant being a minor or other
5 University concerns that we might know about or other conduct.

6 **Q.** All right. Okay.

7 So Jane Roe requested that nothing proceed further. You
8 checked it out with the tripartite board, and you told her it
9 was fine to wait?

10 **A.** Yes. The purpose at that point is that the University is
11 determining if they can agree to that request, not determining
12 any level of responsibility for behavior.

13 **Q.** Okay. So if I understand, and I think the Court was
14 asking about this as well, there's different avenues at
15 Notre Dame where different employees at Notre Dame come into
16 information about complaints that involve sexual assault,
17 correct?

18 And what I mean by that is, let me break it down
19 generally, there is confidential avenues and nonconfidential
20 avenues, is that correct?

21 **A.** That's accurate, yes.

22 **Q.** And a confidential avenue might be if they disclose
23 something in the University counseling or with the University
24 counselor?

25 **A.** That's accurate.

1 Q. Or if they were to reveal something to a priest on campus?

2 A. In certain specific time frames like sacrament of
3 confession, but, yes.

4 Q. And there's some nonconfidential ways. For example, you
5 are a nonconfidential avenue, correct?

6 A. Yes.

7 Q. Obviously, if they report something to the police, that's
8 nonconfidential. If they use some of the other services that
9 OCS has like gender relations --

10 A. At the university. Not through OCS, but, yes.

11 Q. So when something comes up the channel through a
12 nonconfidential source, you decide on your own whether or not
13 you want to take it further?

14 A. I look at the information presented and determine if the
15 behavior alleged could possibly be a violation of one of the
16 policies.

17 Q. Okay. And you can choose to disregard the wishes to the
18 student, the complainant in that case, and move forward?

19 A. We can work through the tripartite process and determine
20 whether or not the University can agree to a request and not
21 move forward.

22 Q. That means the University cannot agree and decide to go
23 forward on its own?

24 A. That is accurate.

25 Q. If it comes in through the confidential branch, that's not

1 going to move forward?

2 **A.** They wouldn't have been reported through any kind of
3 process 'cause that's a resource piece, so, no, it doesn't go
4 any farther.

5 **Q.** So I want to talk about then your frame of mind as you
6 approach these items.

7 Is it fair to say that you have an understanding of what
8 Title IX is meant to do?

9 **A.** I do, yes.

10 **Q.** Okay. And what is that understanding?

11 **A.** It is about access to education based on sex and gender.

12 **Q.** Okay. And the idea is to provide equal access, to not
13 allow gender to be a factor in disparate treatment?

14 **A.** That's accurate, yes.

15 **Q.** Okay. And one of the ways that education can be affected
16 or made different is if one gender suffers sexual assault on
17 campus, that interferes with the education process?

18 **A.** I would assert that anyone who has been impacted by sexual
19 assault, so that could be a man or woman or any person on
20 campus, so I think that that -- the idea is that we want to
21 make sure that students can pursue their academic inquiry and
22 cocurricular activities regardless of being male or female.

23 **Q.** Do you have an awareness in your mind as you approach
24 these issues as they come to you that you need to be on the
25 lookout so that the process is also not used to abuse -- or to

1 abuse a respondent?

2 **A.** Yes. I mean, we try to, as we review information through
3 the administration investigation, we have options available to,
4 sort of, look at those pieces. We assume that people are
5 presenting information in good faith; but if we learn through
6 that process that that is not the case, then we have the option
7 to pursue other actions.

8 **Q.** So you agree that you want your process to be fair?

9 **A.** Oh, yes, sir.

10 **Q.** And in making that process fair, you don't want to
11 sacrifice one student's rights for another, is that correct?

12 **A.** That is accurate. In fact, our process is very
13 intentional about trying to create spaces for all parties to
14 have a space to share their perspective, to clarify information
15 through the investigations all the way through the conduct
16 process.

17 **Q.** And so if you aren't doing that, then you would agree that
18 you are not being fair?

19 **A.** I guess I would try to understand what you are asserting
20 in terms of the behavior.

21 **Q.** Sure. You said you have spaces for all parties
22 concerned --

23 **A.** Uh-huh.

24 **Q.** -- to address their concerns to make sure that's part of
25 being fair. Correct?

1 A. Correct.

2 Q. So my question to you then is: If you are not doing those
3 things, then would you conclude that you are not being fair?

4 A. I would have to look at the information 'cause I think
5 that there's a difference between being equal and equitable, so
6 I would have to know more about what you are talking about
7 specifically.

8 Q. Okay. And you're aware that -- and let me ask you this,
9 if you think it makes a difference, because the way Title IX
10 works at the University of Notre Dame and probably the way it
11 works at a lot of schools, is that it's frankly a private
12 process as to the public, is that correct?

13 A. It's an administrative process run through the University.

14 Q. It is internal to the University?

15 A. Yes.

16 Q. Okay. I can't come to a Title IX meeting and start asking
17 questions?

18 A. We can have advisers present, but we are not allowed to
19 have third-party representation.

20 Q. In fact, at the hearings the advisers are not even allowed
21 to whisper, isn't that true?

22 A. You would have to talk to someone in the Office of
23 Community Standards about how they manage that.

24 Q. Okay.

25 **THE COURT:** Can I interrupt just for a second --

1 **MR. AGOSTINO:** Sure.

2 **THE COURT:** -- and ask some more board questions.

3 **THE WITNESS:** Sure.

4 **THE COURT:** I want to get some more context for what
5 you actually do. You have been on the job about 18 months.

6 **THE WITNESS:** Yes, sir.

7 **THE COURT:** Let's say, in a calendar year -- let's
8 say in the last 12 months, how many complaints have been lodged
9 that you have had to, kind of, look into, roughly?

10 **THE WITNESS:** Roughly -- so at this point, close to
11 100.

12 **THE COURT:** Okay. So we're talking, you know, every
13 third day, roughly --

14 **THE WITNESS:** Uh-huh.

15 **THE COURT:** -- you get a new complaint?

16 **THE WITNESS:** Uh-huh.

17 **THE COURT:** Again, speaking broadly, because I know
18 off the top of your head here, how many of those involved
19 allegations of sexual assault?

20 **THE WITNESS:** Probably a little less than a quarter
21 of those.

22 **THE COURT:** Can you give me a flavor of what the --
23 is it just -- is there some way you can characterize your
24 docket, sort of, writ large here?

25 **THE WITNESS:** Sure. So are you asking more about

1 support --

2 **THE COURT:** Nature of the complaint.

3 **THE WITNESS:** We have -- obviously, a good portion
4 are related to, sort of, nonconsensual penetration, so sexual
5 assaults.

6 **THE COURT:** Okay.

7 **THE WITNESS:** And there are a chunk that are
8 nonconsensual contact as well.

9 **THE COURT:** Of a sexual nature.

10 **THE WITNESS:** Of a sexual nature, yes.

11 **THE COURT:** Okay.

12 **THE WITNESS:** We have had an increase in the dating
13 violence, domestic violence piece, so I would be guessing about
14 the number, but certainly less than sexual assaults. We've
15 seen an increase in, sort of, stalking behavior allegations;
16 but, again, specific numbers I wouldn't be able to give you
17 right now off the top of my head. And then other conduct that
18 creates a hostile environment, sort of, fills in the gaps
19 there.

20 So it is -- it's anything -- a student can come in and
21 share information; and if it could possibly be a violation of
22 one of those policies, that's, sort of, how we gauge going
23 forward because I don't have enough information initially. We
24 want to gather information. That's why we have the
25 administrative investigation process.

1 **THE COURT:** Was the complaint that was brought by
2 Jane Roe -- which the sum and substance of it really appears to
3 me to be that it was a perpetual barrage of threatened suicide
4 and a relentless "I'm going to kill myself." I can certainly
5 understand how the receiver of that information could be
6 alarmed by that. What I'm trying to get at is, was this a
7 unique situation, or had you had other cases where that was the
8 kind of sum and substance of the allegation?

9 **THE WITNESS:** This has happened before. I would have
10 to look at specific cases, but I think that when we looked at
11 this the thing that, sort of, moved it forward was that we have
12 this, sort of, threat of harming self but, sort of, the other
13 pieces that were a part of it that made it, sort of, coercive,
14 in terms of, if you don't do this, then I'm going to hurt
15 myself. And that's, sort of, why we initially moved forward
16 because we wanted to learn more about that piece at that time.

17 **THE COURT:** All right. That gives me some context.
18 I just wanted to have some sense for what the nature of --

19 **THE WITNESS:** Sure.

20 **THE COURT:** I'm sorry, Mr. Agostino. You may
21 proceed.

22 **MR. AGOSTINO:** Thank you, Your Honor. That was very
23 helpful.

24 **BY MR. AGOSTINO:**

25 **Q.** I want to understand what you mean by what made you move

1 forward. At what point in time did you move forward? What was
2 the step that you considered moving forward?

3 **A.** Sure. So for clarification, in the October concern, we
4 didn't have texts or anything like that, so we didn't have any
5 of that information. In November when I was contacted by the
6 complainant Roe, then we did have some of that information
7 presented; and so we were able to have a little bit more
8 context for those interactions.

9 **Q.** Okay. So that's when you're identifying moving forward,
10 sometime in November?

11 **A.** November, yes.

12 **Q.** Okay. All right. And then just a couple little more
13 background questions here.

14 And so then you have this -- you work under student
15 affairs. And then there's this OCS office. Can you tell us
16 what that is?

17 **A.** The Office of Community Standards is responsible for
18 adjudication and, sort of, enforcement of standards of conduct
19 on campus.

20 **Q.** Okay. And where is their office located?

21 **A.** Over in the main building.

22 **Q.** Is that where your office is too?

23 **A.** No, it is not.

24 **Q.** You are in a different building?

25 **A.** Yes, sir.

1 Q. Okay. And so when you say "in charge of adjudication," is
2 there's three people in OCS?

3 A. Yes.

4 Q. And they are?

5 A. They are Ryan Willerton, Amber Monroe, and Brenda Hunt.

6 Q. And they're the three then that hear a review of your
7 determination on an investigation?

8 A. They actually adjudicate all types of conduct so not just
9 Title IX work, but they would receive the report and determine
10 how to pursue with an administrative hearing if it were
11 appropriate.

12 Q. Okay. In your process, in November at some point you
13 determined you want to start some investigation?

14 A. I determined that the information presented could possibly
15 be a policy violation and so gave the complainant the option to
16 move forward if she wished.

17 Q. If she decided to move forward, what was your next step?

18 A. My next step was contact Doe to schedule a meeting to
19 inform him of the allegations.

20 Q. Okay. And then do you conduct further interviews, or do
21 you assign that to someone else?

22 A. I assign that to someone else.

23 Q. You wait for that person to report to you?

24 A. Yes, sir.

25 Q. And then when you get that whole report, then your -- do

1 you make some judgment call on that?

2 **A.** If anything -- if the behavior that's alleged in that
3 report and the, sort of, documentation, again, could possibly
4 be a policy violation, I give the complainant information about
5 whether or not that person would like to move forward. In this
6 case, Roe.

7 **Q.** Okay. The decision before it, at this point has it been
8 reviewed by this adjudication board?

9 **A.** No. They don't get that until the complainant has made a
10 decision about how they would like to move forward.

11 **Q.** If the complainant tells you they want to move forward,
12 then you formulate the charges, if you will, or not?

13 **A.** I share information about what the initial concern was so
14 that they have some context for why we initiated the
15 investigation, but then they actually make determinations about
16 policy questions through the conduct process.

17 **THE COURT:** They being OCS?

18 **THE WITNESS:** Yes. Yes. Thank you for clarifying.
19 Office of Community Standards, yep.

20 **BY MR. AGOSTINO:**

21 **Q.** Okay. They don't have to give you an okay or preapprove
22 your coming forward with charges?

23 **A.** No. No, not at all.

24 **Q.** Okay. And then do they make a determination of the
25 validity of the charges before or after the review hearing?

1 A. You'd have to talk to the Office of Community Standards
2 about their process for that.

3 Q. Okay. All right.

4 THE COURT: Can I ask another question. I'm sorry.

5 MR. AGOSTINO: Sure.

6 THE COURT: How many investigators are on your staff
7 that you can forward the work to?

8 THE WITNESS: We have three that we utilize.

9 THE COURT: Are these retired police officers? What
10 kind of training do they have in, sort of, doing
11 investigations?

12 THE WITNESS: Sure. They are all lawyers by
13 education, and so Lynn in this specific case has worked with us
14 for the last five years and has participated in several
15 trainings through different organizations. So we have been
16 together through six -- two of them in the last six or eight
17 months, I guess.

18 THE COURT: Got it. Okay.

19 Can you give me a sense for, as best you can on a
20 percentage basis, how many complainants are women against men
21 versus men against women, separating out same sex allegations?

22 THE WITNESS: Sure. I mean, over the years, it's
23 probably 90 percent women against men, but we do have men
24 against women claims quite frequently, and especially in cases
25 of countercomplaints as well.

1 **THE COURT:** Is the bulk of the 10 percent made up of
2 countercomplaints, or are there some -- you understand what I'm
3 getting at?

4 **THE WITNESS:** I understand what you're saying. I'm
5 not sure off the top of my head. I would have to double-check.
6 We have both, so we have students who come forward who are men
7 who are sharing complaints initially, and then there are other
8 pieces where -- it can't be a race to reporting. So sometimes
9 when we're hearing a report -- I don't want someone to come in
10 and they are, sort of, deflecting that. So it is, sort of,
11 counter, but it is more about the same interaction; so it is
12 not necessarily retaliatory in nature in that way.

13 **THE COURT:** So when you have a situation where there
14 are people in a long-term relationship and you're dealing with
15 21-year-olds or 20-year-olds and there's often thousands of
16 communications between the two and it boils down to allegations
17 going both ways, do you handle those in the same proceeding
18 because they are intertwined with one another?

19 **THE WITNESS:** Sure. Yeah. That's the goal. So it
20 depends on when we learn about different pieces of allegations.
21 We try to look at, sort of, countercomplaints of those
22 different allegations through the same investigation and then,
23 you know, continue -- if we need to have another investigation
24 to continue to look at different pieces that have come forward
25 then, yes, we try to have them all in the same, sort of,

1 hearing and investigation because they are talking about the
2 same issue, right.

3 **THE COURT:** Right. So in those situations, is there
4 some process by which the matter is mediated, essentially,
5 before going to some formal hearing whereby the University gets
6 the parties to say, don't be in touch with one another and
7 that's the end of this matter and if somebody violates this
8 then there's consequences. I mean, especially in these kind of
9 long-term relationships which -- you understand what I'm
10 getting at.

11 **THE WITNESS:** I do. I do. So the challenge is that
12 our policies actually say that for anything that's, sort of, an
13 allegation of sexual assault, nonconsensual sexual contact,
14 dating violence, domestic violence or stalking can't be managed
15 in an informal manner. And so we have to go through a more
16 formal process given that and, sort of, the guidelines that
17 we've been given. So that's the path we chose after, sort of,
18 the Dear Colleague letter, and that's where we are currently.

19 **THE COURT:** Okay. All right. Thank you.

20 **THE WITNESS:** Yep.

21 **BY MR. AGOSTINO:**

22 **Q.** I'm placing before you what's marked as Plaintiff's
23 Exhibit 20. And this was produced by University of Notre Dame.
24 It is Bates stamped at UND2033. Do you see that?

25 **A.** Yes, I'm sorry.

1 Q. I'm going to flip it over because this copy is copied on
2 both sides.

3 THE COURT: You have to scroll it down there. It is
4 not on the screen.

5 MR. AGOSTINO: I'm sorry. Thank you.

6 BY MR. AGOSTINO:

7 Q. That's your signature there, right?

8 A. Yes.

9 Q. And I'm going to flip back to the front page. Do you then
10 recall sending this letter to Student A, and I'll represent
11 that Student A is Jane Roe?

12 A. Yes.

13 Q. Okay. And so this was when she first came in to -- after
14 she came in to see you, told you about the situation. She told
15 you she was getting lots of texts?

16 A. Uh-huh.

17 Q. Is that yes?

18 A. Yes.

19 Q. Did she tell you that the person that -- the other
20 student, the respondent, what did she tell you about the
21 respondent?

22 A. She told me that was Doe.

23 Q. And what did she tell you about Doe?

24 A. She told me that she was concerned about his safety
25 because he had been sending messages about trying to kill

1 himself and that she was concerned about the volume of texting
2 her but wanted him to get help more so at that point.

3 Q. And based on your observation of how she relayed this to
4 you, did you believe she was sincere about her concern that he
5 was -- had suicidal thoughts?

6 A. I think she was concerned about how he was texting her and
7 thought that he would possibly harm himself.

8 Q. She appeared genuine in that concern?

9 A. Uh-huh.

10 Q. And you in response to her coming forward offered her a
11 number of services available to her at the University, is that
12 correct?

13 A. Yes.

14 Q. And those included counseling, NDSP, which is police
15 department?

16 A. Uh-huh.

17 Q. And university health services, rectors and campus
18 ministry?

19 A. Yes.

20 Q. You did that because you thought those might be helpful to
21 her?

22 A. I think they would be helpful to a person who is
23 participating in the process, yes.

24 Q. And at the time that this letter was generated, did you
25 generate any letter to the respondent?

1 A. I did not. That's not a part of the process when we have
2 a tripartite because we don't contact the respondent
3 necessarily through that process.

4 Q. And as someone that works at the University, did you take
5 any steps to accommodate or deal with or address any concerns
6 of suicide with respect to John Roe?

7 A. Do you mean John Doe?

8 Q. John Doe. I'm sorry.

9 A. I just want to make sure.

10 Q. Thank you.

11 A. I'm sorry. I'm trying to use the pseudonyms. Our
12 Associate Vice President Dr. Bill Stackman met with John Doe to
13 check in to see how he was doing and then also help him
14 identify ways to get assistance if he was actually in a space
15 where he felt like he might harm himself.

16 THE COURT: Was this prompted after this letter --

17 THE WITNESS: It was.

18 THE COURT: -- and after the October complaint?

19 THE WITNESS: Yes. Yes, it was.

20 BY MR. AGOSTINO:

21 Q. Okay. Did you provide or -- you didn't send a letter to
22 John Doe connected to this October 14th letter?

23 A. No, I did not. That wouldn't have been standard practice
24 in our process.

25 Q. Okay. And then let me show you what's marked as

1 Plaintiff's Exhibit 21. I'm gonna flip it over as well.

2 That's your signature, is that correct?

3 **A.** It is.

4 **Q.** And these were University of Notre Dame documents Bates
5 stamp 2035 and 2036. And can you tell us what the purpose of
6 sending this letter is?

7 **A.** Can I read the rest of the letter 'cause I'm not sure
8 what -- this looks very similar to the last letter, so I want
9 to make sure that I'm -- this is to notify Roe that the
10 tripartite board determined that they could agree to her
11 request not to initiate an investigation.

12 **Q.** I want to jump ahead with Exhibit 22, and I'm going to
13 bring it down here a little bit.

14 Do you see this is an e-mail to you dated February 3,
15 2017?

16 **A.** I do.

17 **Q.** Okay. And is this a -- I think as -- I think you used the
18 term counterclaimant type?

19 **A.** Both the complainant -- both Roe and Doe both had
20 allegations related to interaction in a stairwell.

21 **Q.** Okay. Now, we have received a couple thousand pages of
22 documents from Notre Dame, and so I'm not sure about this. But
23 do you have -- do you recall sending a letter like Exhibit 21
24 to Mr. Doe after he provided you this e-mail, Exhibit 22?

25 **A.** I don't recall doing that, no. I recall sending an e-mail

1 letting him know I didn't include it in the investigation.

2 Q. But you don't recall sending a letter?

3 A. No. That wouldn't be practice necessarily. If we have an
4 ongoing administrative investigation, we typically would just,
5 sort of, include that within that place or send an e-mail
6 rather than a formal letter.

7 Q. So do you recall sending him an e-mail in which you told
8 him there were services or basically the same content as
9 Exhibit 20?

10 A. I don't recall sending an additional e-mail. I believe he
11 was sent that information when we opened the initial
12 investigation as a respondent because the resources are the
13 same for either of those rules.

14 Q. But you didn't make him aware of resources with connection
15 with his complaint as you did with Jane?

16 A. No, I didn't send a second letter incorporating
17 information about resources.

18 Q. Okay. All right. And incidentally you are not -- you
19 mentioned that John Doe spoke with Mr. Stackman, or you thought
20 he did, is that correct?

21 A. He spoke to Dr. Stackman in late October I think.

22 Q. Were you in that meeting?

23 A. I was not, not in the October meeting.

24 Q. You don't know what they were talking about?

25 A. No.

1 Q. And then you don't know if Mr. Stackman offered him any
2 services?

3 A. I don't know. I can't speculate about that.

4 Q. All right. I want to go through some of the documents
5 that have been produced so we can get them into the record
6 here.

7 Before you is Exhibit 23. And these are e-mails that
8 involve you concerning the situation, is that correct?

9 A. Yes.

10 Q. Dated October 13, 2016?

11 A. Yes.

12 Q. Okay. And there's a question here referred to you from a
13 Keri Kei Shibata on the first e-mail at the top.

14 A. I don't -- Keri Kei. I don't see an e-mail. I see the
15 e-mail.

16 **THE COURT:** If you touch the screen you can circle
17 it.

18 **BY MR. AGOSTINO:**

19 Q. There's an e-mail right here I'm pointing to.

20 A. Uh-huh.

21 Q. Is there an e-mail or an e-mail was forwarded from Annie
22 Eaton to you?

23 A. It appears that way, yep.

24 Q. Okay. And who is Annette Eaton?

25 A. Annie Eaton is a care consultant at the university. She

1 works with students that are managing significant issues or
2 need some assistance with resources.

3 Q. Do you know if she met with either Jane Roe or John Doe?

4 A. I'm not sure off of this e-mail. I would be speculating.

5 Q. And who is saying, "Heather, I'm thinking this is probably
6 more of a Title IX issue"?

7 A. When I'm reading that, it seems that Annie is suggesting
8 that because it's a nonconfidential resource, so she would need
9 to make a report.

10 Q. She says, "Is it something we should do jointly?"

11 A. That means that rather than having a person share their
12 information once, they would actually try to see if I could
13 meet with them at the same time so it would be just one meeting
14 rather than trying to add extra meetings.

15 Q. And did you have discussions with anyone from the Notre
16 Dame Security Police Department yourself?

17 A. Not at this time, no.

18 Q. Okay.

19 A. I don't believe so.

20 Q. All right. And did Ms. Eaton share with you any concerns
21 about any mental health or mental illness of John Doe?

22 A. That's actually part of the reason we were interacting
23 initially was 'cause we were trying to figure out how to get
24 some resources to him.

25 Q. Okay. And in October are you aware of any resource that

1 you referred him to?

2 **A.** I didn't have any interaction with him in October. Other
3 people would have managed that, so that would have been
4 someone, either Dr. Stackman or someone else in the care
5 consultant. I wasn't a part of that.

6 **Q.** Are you aware of a referral of John Doe for any mental
7 health or any service connected to his mental health?

8 **A.** I can't recall that right now. I'm not sure.

9 **Q.** Are you trained in psychology in any way?

10 **A.** No.

11 **Q.** Psychology, counseling?

12 **A.** No. My degrees are in administration and talking.

13 **Q.** So you wouldn't have the ability on your own then to
14 interpret or decipher whether someone who is engaged in some
15 type of manic activity, excessive texts, for example, whether
16 that is an indicator of something?

17 **A.** That wouldn't be something I would be assessing, no. I
18 would be assessing whether or not someone needed assistance
19 when I was meeting with them, but beyond that I wouldn't be
20 diagnostic in nature because that wouldn't be appropriate.

21 **Q.** Does it play any part as part of a Catholic university to
22 factor that into your analysis?

23 **A.** I look at behavior of people who are allegedly
24 respondents; and if the behavior could possibly be a policy
25 violation, then that's what would potentially initiate an

1 administrative investigation.

2 Q. And in terms of determining whether or not that behavior
3 could be stopped, is it important to consider what the cause of
4 that is?

5 A. That's why we have an administrative investigation, to
6 learn more about what happened and sort of the behavior that
7 was alleged and whatnot.

8 Q. Okay. Was any psychologist or any psychological expert of
9 any kind engaged in that process to evaluate what was going on
10 in this case?

11 A. No, we don't typically include psychologists or other
12 folks.

13 Q. But you don't know whether there should be then because
14 you are not familiar with that, just not something that you do?

15 A. We just haven't used them at this point, no.

16 Q. Okay. All right. Now, did there come a time when you
17 started to get communication from Jane Roe's mom?

18 A. I received communication from her mother, yes.

19 Q. And were you aware that her mom was an attorney?

20 A. I feel like she shared that in an e-mail or a couple.

21 Q. Pardon?

22 A. I think she shared that in a few e-mails, yes. Yeah.

23 Q. Okay. And before you is Exhibit 24?

24 A. Uh-huh.

25 Q. Bates stamped UND647?

1 A. Uh-huh.

2 Q. And is this an e-mail you received from Jane's mother?

3 A. Yes, it is.

4 Q. Okay. And at the top it is titled, Why is NDSP not
5 helping her daughter?

6 A. Roe, yes.

7 Q. And, I mean, how would you characterize this e-mail? I
8 mean, it does appear to be somewhat critical?

9 A. It would not be the first time a parent has been critical
10 of process at the University.

11 Q. Okay.

12 A. Yes.

13 Q. All right. And, in fact, she says that Notre Dame police
14 has basically given John Doe carte blanche to F with her?

15 A. That was her assertion but doesn't change my process at
16 all.

17 Q. Okay. And then she complains about Jane's grades and her
18 missing classes, and then she mentions John Doe's suicidal
19 brother going into an eight-week hospital in Hawaii. Do you
20 see that?

21 A. I do see that, yes.

22 Q. Okay. In your mind, did that, I guess, that fact or the
23 mention of that give more credence to the fact that John Doe
24 was also suicidal?

25 A. When we have feedback from parents, we just continue to do

1 our process and so didn't change, sort of, the way we managed
2 that.

3 Q. So you pretty much ignored this? You ignore what parents
4 say?

5 A. No, that's not accurate.

6 Q. I didn't think it was.

7 A. No, what I'm saying is, when we received this, it was,
8 sort of -- we try to respond but know that it is not going to
9 impact the way that we work with the students.

10 Q. I'm going to place before you what's marked as Plaintiff's
11 Exhibit 25.

12 You recognize this e-mail?

13 A. Yes.

14 Q. And you are writing to Jane, is that right?

15 A. Yes.

16 Q. And at that time what was your understanding of what was
17 going on?

18 A. That she believed that Doe had been walking in the same
19 hallway or in the same area as her that day.

20 Q. In fact, didn't she want or try to get you to believe that
21 John Doe could be nowhere on campus?

22 A. She had a protection order, and we were trying to clarify
23 what that meant.

24 Q. Okay. Was she trying to lead you to believe that the
25 protective order required John Doe to not be on campus?

1 A. That was the initial assertion, yes.

2 Q. Okay. And did you discover that assertion was false?

3 A. Based on the language that was used, NDSP determined --
4 they sort of managed that piece of it in terms of how that is
5 enforced on campus. I don't make definite decisions about that
6 because it is a legal document, and I manage the administrative
7 process. So I only manage the no contact order through the
8 University.

9 Q. Okay. But you certainly -- I mean, did you ask for a copy
10 of the contact order?

11 A. We did, and we received a copy of it.

12 Q. Did you learn from receiving that, as someone that could
13 read, that it allowed him to be on campus?

14 A. It said that he wasn't allowed to be on school or within
15 300 feet as I recall, so, yeah.

16 Q. It allowed him to be on campus?

17 A. I don't know that that's accurate based on the initial
18 one. I would have to look at it again to see it.

19 **THE COURT:** Just for clarification, Mr. Agostino, are
20 we talking about a protective order that was issued by St.
21 Joseph County authorities?

22 **MR. AGOSTINO:** Yes, I apologize.

23 **THE COURT:** Okay. Mr. Agostino, I'm going to ask
24 you, could you move that microphone towards you a little bit
25 because I'm having difficulty, and my law clerk is as well. It

1 would be helpful.

2 **BY MR. AGOSTINO:**

3 **Q.** So let me put down here Exhibit 26.

4 This is a copy of the protective order that was produced
5 by Notre Dame, and it is Bates stamped 747, 748, and 749. And
6 I'm looking at page 748 which sets out the order.

7 And in paragraph 2 it says, "Respondent is to be allowed
8 to continue attending Notre Dame until further action from the
9 Court." Do you see that?

10 **A.** I'm sorry. I'm missing that part of it. I was reading --

11 **Q.** Under the Order section.

12 **THE COURT:** What number are you referencing?

13 **MR. AGOSTINO:** Paragraph 2 under the Order section.

14 **THE WITNESS:**

15 **A.** I'm reading that, yes.

16 **BY MR. AGOSTINO:**

17 **Q.** Pardon?

18 **A.** I see that.

19 **Q.** Okay. That refresh your recollection?

20 **A.** Yes, I guess my question is is this the first or the
21 amended version because I feel like that was an amended
22 version. I think the initial one was a pretty standard
23 language. If I recall was 300 feet away, the school,
24 residence. It had everything listed that you would see on one
25 that was, sort of, a template; and it was amended I think.

1 So -- again, I'm not -- I don't deal with --

2 Q. I'm not trying to trick you up here. On page 749 --

3 A. No, I'm trying to --

4 **THE COURT:** Let's not talk over one another. Let him
5 answer the question.

6 **THE WITNESS:** Oh, I'm sorry. I apologize.

7 **BY MR. AGOSTINO:**

8 Q. I've turned to page 749 here on Exhibit 26, and you can
9 see that that 300 foot radius is in there?

10 A. Uh-huh.

11 Q. Does that refresh your recollection?

12 A. It does, but I think that looks like the date says
13 January 30, 2016, which seems wrong. I don't know if that's
14 the 2017 one, so that might be the amended because there was
15 one in November, if I remember correctly, and then one in
16 January to clarify where people were allowed to be.

17 **BY MR. AGOSTINO:**

18 Q. I'm going to place a two-page document before you as
19 Exhibit 27 and ask you if you recognize this e-mail?

20 A. I do.

21 Q. Okay. And then this is a second complaint by Jane Roe's
22 mom that's being forwarded to Mr. Stackman?

23 A. I'm not sure about the number.

24 Q. Okay. Is that continued further criticism of how
25 Jane Roe's complaint was being handled?

1 A. I'd have to check the dates 'cause I'm not sure about that
2 but, yeah.

3 Q. This one is dated November 30th, is that right?

4 A. Yes, it is.

5 THE COURT: Can you just scroll that up on the screen
6 because if you look, we can't see it.

7 MR. AGOSTINO: I apologize. Yes.

8 BY MR. AGOSTINO:

9 Q. And this was around the time that you have decided to keep
10 moving forward with Jane Roe's complaint?

11 A. This is after we've actually notified both parties that
12 we've moved forward the investigation.

13 Q. And there's increasing pressure on you at least by
14 Jane Roe's mom to keep moving forward to do something?

15 A. It has already been moved forward, so any pressure doesn't
16 matter at that point. We're already in it so to speak.

17 Q. I'm going to place before you what's been marked as
18 Exhibit 28 and ask you if you recognize this.

19 A. I do.

20 Q. Yes?

21 A. Yes.

22 Q. Okay. And what is this?

23 A. It is another e-mail from Roe's mother.

24 Q. And she's explaining how Jane Roe had experienced the loss
25 of some friends from high school, is that correct?

1 A. Uh-huh, yes.

2 Q. And that that made her vulnerable to John Doe and his
3 discussions about suicide, is that correct?

4 A. That's what she's asserting, yes.

5 Q. Okay. And she's telling you that the exploitations of her
6 emotions are particularly cruel and inexcusable, is that right?

7 A. That's what you've highlighted, yes.

8 Q. Okay. Did you make that determination?

9 A. We had already moved to the administrative investigation,
10 so we determined that the behavior alleged could possibly be a
11 policy violation. So this correspondence had no impact at all
12 on that process.

13 **THE COURT:** What exhibit number was that, Counsel?

14 **MR. AGOSTINO:** That was No. 28.

15 **THE COURT:** Thank you.

16 **BY MR. AGOSTINO:**

17 Q. I'll show you what's been marked as Exhibit 29, and do you
18 recognize this e-mail?

19 A. I do.

20 Q. All right. And what is that?

21 A. That is another e-mail from Roe's mother.

22 Q. Okay.

23 A. Later that day.

24 Q. So she's starting to bombard you with e-mails as well, is
25 that right?

1 A. She sent multiple e-mails on that day, yes.

2 Q. And she's pretty upset?

3 A. Yes.

4 Q. And you're feeling some pressure to do something, aren't
5 you?

6 A. We had already initiated the administrative investigation.
7 There was no pressure to do that.

8 Q. Okay. And then I'll show you what's been marked as
9 Exhibit 30.

10 You recognize what that is?

11 A. Can you pull it up so I can see?

12 Q. Yes.

13 A. Thank you. Appreciate that. I do, yes.

14 Q. What is that?

15 A. I believe that's another e-mail from Roe's mother.

16 Q. Okay. And, again, she continues to be critical, is that
17 correct?

18 A. Yes.

19 Q. And she brings up the Lizzie Seeberg case, is that
20 correct?

21 A. She does, yes.

22 Q. Okay. And what is that case?

23 A. That was before my time at the institution, but it
24 involved a student at St. Mary's.

25 Q. Who committed suicide?

1 A. Yes.

2 Q. All right. And she committed suicide because -- we don't
3 know why exactly but following a complaint, a Title IX
4 complaint about an assault by a male student?

5 A. That's what I read, but I don't have more information
6 about that.

7 Q. Do you know what the role of the Lizzie Seeberg case is or
8 was in connection with the Dear Colleague letter?

9 A. I mean, I guess -- you mean generally?

10 Q. Yeah.

11 A. I guess, can you clarify what you mean.

12 Q. You work in the Title IX area.

13 A. I know that it happened in fall of 2010, and the Dear
14 Colleague letter came out in April of 2011. Beyond that, I
15 don't know if there's a connection per se.

16 Q. What is the Dear Colleague letter?

17 A. It is a letter from the Office of Civil Rights providing
18 guidelines and instruction on how to respond to allegations
19 related to sexual harassment.

20 **THE COURT:** That's the Office of Civil Rights in the
21 Department of Education?

22 **THE WITNESS:** Yes, sir.

23 **BY MR. AGOSTINO:**

24 Q. That was something that you felt compelled and the
25 University and Title IX actions felt compelled to follow?

1 A. Yes, sir.

2 Q. Okay. Let me show you what's marked as Exhibit 31.

3 Can you tell me what that is?

4 A. Can you scroll it down, please. Thank you.

5 Yes, that is following up on our request that the -- Roe
6 had made to contact faculty on her behalf, which is afforded to
7 anyone if they request it; so a complainant or respondent could
8 make a request that I do that.

9 Q. When you wrote this letter you felt that Jane Roe was
10 managing an extremely difficult situation, correct?

11 A. That's the text that I use if a complainant or respondent
12 requests I contact faculty. It doesn't change. It is a
13 template I use.

14 Q. Okay.

15 A. I would actually assert that both complainants and
16 respondents are challenged during these times which is why we
17 offer that as an accommodation to both.

18 Q. Okay. You are not in the habit of using words you don't
19 mean?

20 A. No.

21 Q. Okay. So you did mean that she was managing the
22 situation?

23 A. Yes.

24 Q. Okay. Exhibit 32. Do you recognize what that is?

25 A. Yes, that is another -- that's a response from a faculty

1 member in response to one of those e-mails.

2 Q. Okay. Did you respond back to that?

3 A. I don't recall. I'd have to -- I'd have to look through
4 documents.

5 Q. Okay. Do you recall sending any e-mails on behalf of
6 John Doe similar to what you have here that's covered in 32 or
7 31?

8 A. I don't recall him requesting that I do that. That's
9 standard if a student participating requests, then I would do
10 that.

11 Q. But you believe that John was going through a difficult
12 situation as well?

13 A. I believe the process can be hard; and so if he needed
14 assistance, we would have contacted faculty so --

15 Q. Exhibit 33, can you tell us what that is?

16 A. That is another letter to a faculty member that was
17 requested by the complainant -- or e-mail, sorry.

18 Q. You were trying to be helpful and accommodating to Jane at
19 her request?

20 A. Well, yes. When we have a complainant or respondent
21 making a request to contact faculty, that would be the template
22 that I would use and contact them on their behalf.

23 Q. When you use the word "template" it makes it sound like
24 you are not thinking about what you are doing, you're operating
25 like a computer. That's not how you operate, is it?

1 A. No, sir.

2 Q. Okay. You think about what you do, is that correct?

3 A. Sure. I just meant I use specific language to make sure I
4 don't confuse faculty members who don't work with this area.

5 Q. Exhibit 34, can you tell us what that is?

6 A. Sorry. I'm reading. Yes, that was an e-mail after that
7 protection order that you showed had been amended.

8 Q. And in your communication you are telling her what you are
9 doing for her, is that right?

10 A. Yes.

11 Q. Any such e-mail done for John?

12 A. I would have to check records. I'm not --

13 Q. Does any come to mind right now?

14 A. Not off the top of my head. I would have to have some
15 catalyst for that.

16 Q. Exhibit 35, can you tell us what that is?

17 A. That looks like an e-mail from the resource coordinator to
18 me for Roe, Roe's resource coordinator.

19 Q. And, again, is this in connection with helping Jane
20 through the process?

21 A. That's in connection to documents that they wanted to
22 supply or she wanted to supply for the process because they
23 have that opportunity through the investigation. And so it was
24 requesting that would we, sort of, pause that so they could do
25 that to have it included.

1 Q. Okay. So she asked for the, I guess, extension of time or
2 continuance or delay?

3 A. The opportunity to provide information.

4 Q. Okay. And to your knowledge that was approved?

5 A. Uh-huh.

6 Q. Is that a yes?

7 A. Yes. Sorry. Thank you.

8 Q. Okay. Do you know whether any similar requests by John
9 Doe were approved?

10 A. I don't believe that I received a request from John Doe
11 about extending that initial investigation, so I don't.

12 Q. Do you know whether others in the process denied his
13 request for delay?

14 A. I'm not sure about that.

15 Q. Okay. Exhibit 36, can you tell us what that is?

16 A. Yes, that is the e-mail that I -- what I just shared, how
17 we communicated the pause and that they were trying to obtain
18 more information.

19 Q. Okay. And you confirmed that the process was going to be
20 paused, is that correct?

21 A. That's accurate.

22 Q. All right. And, again, do you know if any similar request
23 was approved or denied with respect to John Doe?

24 A. I don't recall, no.

25 Q. All right. Now, I pulled a page out of *du lac* I marked as

1 Exhibit 37. Are you familiar with what *du lac* is?

2 A. I am, yes, sir.

3 Q. You better be, right?

4 A. Right. Yeah.

5 Q. I highlighted an area here. Do you see that?

6 A. Uh-huh.

7 Q. And it says, "The Office of Community Standards may
8 reschedule an administrative hearing based on extenuating
9 circumstances," do you see that?

10 A. I do, yes.

11 Q. Okay. But typically these hearings are not rescheduled?

12 A. The Office of Community Standards manages that. They
13 would be able to answer that more accurately. I don't have
14 anything to do with actual scheduling.

15 Q. It would be unusual for a rescheduling to occur?

16 A. From my experience, yes, but, again, they manage that.

17 Q. And if that accommodation had been made with respect to
18 Jane, you think in fairness that similar accommodations should
19 have been made with respect to John?

20 A. I think if I had been approached by the respondent that he
21 was trying to obtain information I probably would have at least
22 considered that to figure out what our options were. I would
23 be speculating because I don't know what information that would
24 be.

25 Q. Sure. As a Deputy Title IX Coordinator you think it is

1 fair to give even opportunity to present evidence?

2 A. Sure, we review the information. Yep.

3 Q. In connection with that, jumping ahead to the review
4 hearing, that's an opportunity to respond to information that's
5 been gathered, is that correct?

6 A. Yes. That's the opportunity to clarify information
7 presented through the investigation, but that's administered by
8 the Office of Community Standards.

9 Q. And sometimes that information that's presented can be
10 very little and sometimes it can be a lot, is that right?

11 A. Yes. I mean, investigations depend on how much
12 information is presented.

13 Q. Would it be fair to delay a process if that type of
14 information consists of a couple thousand pages?

15 A. You need to talk to the Office of Community Standards. I
16 don't administer that.

17 Q. Exhibit 38, can you tell us what that is?

18 A. Looks like an e-mail about a student participating in the
19 investigation.

20 Q. Okay. You are directing Lynn Kalamaros with respect to
21 that?

22 A. Yes.

23 Q. And do you know what student?

24 A. Not sure off the top of my head, but I think I have an
25 idea.

1 Q. Okay. Was this a student that could have been contacted
2 by phone?

3 A. I don't know that. I have no reason --

4 Q. Was this a student that you believe would have been
5 supportive of John?

6 A. I don't recall. I think it might have been someone that
7 Roe had shared information about.

8 Q. Do you know if he was ever contacted?

9 A. I believe Lynn had reached out to him and hadn't heard
10 back; and so if I recall, he may have reached out to her later.

11 **MR. LEICHTY:** Your Honor, one point to note, sorry to
12 interrupt you, Mr. Agostino, but I did see a name at the top of
13 that e-mail.

14 **THE COURT:** I saw the same thing. We may need to
15 redact that in the regarding line. Do you see what I'm
16 referencing?

17 **MR. LEICHTY:** Very top of the e-mail.

18 **MR. AGOSTINO:** I apologize.

19 **MR. LEICHTY:** We had six or seven people working
20 terribly hard to redact these carefully. It took a lot of
21 time, but I see that one. That's our fault.

22 **MR. AGOSTINO:** It is a lot to redact.

23 **BY MR. AGOSTINO:**

24 Q. Exhibit 39, can you tell us what that is?

25 A. Yes, so that was -- we had received an allegation from Roe

1 that Doe had retaliated because he allegedly shared medical
2 information that was a part of the investigation process with a
3 group of people who may have been witnesses. It is currently
4 being investigated right now.

5 **THE COURT:** Tell me again what that is.

6 **THE WITNESS:** So the -- Roe had alleged that Doe had
7 retaliated by sharing details that were in the administrative
8 investigation, so specific medical information about her, with
9 other parties who may have been witnesses. So that was, sort
10 of, the initial allegation there. So it initiated another
11 investigation after that first one.

12 **THE COURT:** Good Lord. Okay. Okay.

13 **BY MR. AGOSTINO:**

14 **Q.** This is an investigation into Doe?

15 **A.** Yes, but it encompasses other pieces as well because he
16 made some allegations as well.

17 **Q.** This case is still open?

18 **A.** It is indeed, yes.

19 **Q.** Okay. And there's an open case of Doe against Roe?

20 **A.** Yes.

21 **Q.** All right. And I know that on page 26 of the *du lac*
22 policy, and I have it right here for you, it talks about when a
23 respondent is involved in more than one investigation, and it
24 talks about the University having the right to combine
25 hearings. Do you see that?

1 A. Uh-huh.

2 Q. Do you know what goes into that decision?

3 A. Sometimes it is about timing. So initially when -- so,
4 for example, the initial investigation that we submitted that
5 was related to, sort of, the texting concerns and whatnot, we
6 forwarded information about alleged no contact violations with
7 that first part so they could have addressed it through that,
8 but it appears they chose not to. So that's where this came
9 from.

10 Q. Does it make sense sometimes to have them all done at one
11 time?

12 A. Oh, yes.

13 Q. And in some of these cases, in a lot of these assault
14 cases, do you have to factor in what the complainant feels in
15 terms of the impact on them?

16 A. Certainly it could be a component. We're also trying to
17 move forward because -- especially we've had all this
18 information that sort of addressed one incident. Sorry. I was
19 talking with my hands. I apologize. So it really, sort of, is
20 situational more than anything.

21 Q. Does it affect your decision in any way, let's say at your
22 level, the impact on the complainant, the subjective impact on
23 the complainant?

24 A. We have a responsibility to have integrity in our process;
25 so while we want to make sure people have resources, we still

1 have to do the process, evaluate and move forward.

2 Q. Certainly if you don't believe the complainant that would
3 affect you?

4 A. I guess I don't necessarily operate where I don't believe
5 someone who makes a report, so I want -- I assume goodwill when
6 someone shares information about a concern.

7 Q. Okay. And sharing that, I guess, goodwill -- so you make
8 a presumption what is being told to you is accurate or
9 truthful?

10 A. That's why we have the administrative investigation to
11 learn more.

12 Q. Show you what's marked as Exhibit 40.

13 Can you tell us what that is?

14 A. Yes, that is a response to a request to an accommodation
15 for a final exam. I'm sorry, not a final, an exam.

16 Q. Okay. And that was done at the request of and on behalf
17 of Jane?

18 A. Yes. If a respondent had made that request we would have
19 assisted them with that as well.

20 Q. And with respect to Jane's request for accommodation,
21 would it be fair to say that you responded fairly quickly?

22 A. I think I happened to be on e-mail that weekend because I
23 had been out, so the answer is, yes, I answered pretty quickly.

24 Q. Do you know whether you responded as quickly to requests
25 for accommodation by John?

1 A. I don't know off the top of my head.

2 Q. Exhibit 41, please, can you tell us what that is?

3 A. That looks like a request for accommodations by Roe.

4 Q. Okay. And this is in March?

5 A. Yes.

6 Q. And does she tell you that there's currently an ongoing
7 criminal investigation?

8 A. I'm sorry, I'd have to read that.

9 Q. I'm sorry. It is not fair when it is laying there and I'm
10 moving it.

11 A. I was, like, I'm having a hard time reading it. I
12 apologize.

13 Q. My fault.

14 A. It says that, yes.

15 Q. All right. Did you find out that that was not true?

16 A. I honestly -- that didn't factor into the decision about
17 accommodations because --

18 **THE COURT:** Listen to his question. Did you find out
19 that that was later not true?

20 **THE WITNESS:** I don't know honestly.

21 **THE COURT:** Okay.

22 **BY MR. AGOSTINO:**

23 Q. Exhibit 42, can you tell us what that is?

24 A. That looks like me responding to some of those requests
25 that were noted in that earlier e-mail.

1 Q. Okay. And, again, responding to requests by Jane?

2 A. Yes, sir.

3 Q. All right. And so it's got the -- I'm sorry I keep moving
4 that. It's got the date of her request and your response, is
5 that right?

6 A. I'm not seeing dates on there. Can you show me.

7 Q. Okay.

8 MS. HAMILL: Scroll it down.

9 THE WITNESS: The e-mail says March 8th.

10 BY MR. AGOSTINO:

11 Q. Let me show you Exhibit 43.

12 Can you tell us what that is?

13 A. That's me forwarding that e-mail to my administrative
14 assistant.

15 Q. Okay.

16 A. To make sure she could have it for recordkeeping.

17 Q. What do you see down at the bottom then, do you recognize
18 that e-mail from Mr. Willerton?

19 A. I do.

20 Q. Okay. Are you aware of situations where information
21 becomes available after a hearing that should be considered?

22 A. Office of Community Standards manages that process, so I
23 wouldn't be able to answer that.

24 Q. You have a responsibility though as a Deputy Title IX
25 Coordinator for the University to make sure that Title IX --

1 handling of Title IX claims is fair, is that correct?

2 **A.** Yes, that's accurate.

3 **Q.** And in your position as a Title IX Deputy Coordinator you
4 would want information that comes out after a hearing if it is
5 relevant and bears on the hearing to be considered, would you
6 not?

7 **A.** I believe the process for that is through a case review;
8 that could be new information that could be presented. So
9 there's a function in the process for that if that's -- if it
10 were appropriate. I would have to look at that. The Office of
11 Community Standards administers that part.

12 **Q.** Is there a further review beyond Office of Community
13 Standards?

14 **A.** There's a case review process.

15 **Q.** Okay. But that's handled by the community standards
16 office, is that not true?

17 **A.** Those are actually people who are outside the Office of
18 Community Standards, but they would be able to answer that as
19 to people who refer to that.

20 **Q.** Okay. And who are those people?

21 **A.** Sorry. Can you clarify what you are asking?

22 **Q.** Who are the people that would review a case determination
23 by the OCS?

24 **A.** There would be a conduct case review board.

25 **Q.** Okay. Is that a fixed board, or are there --

1 A. Again, OCS would be able to talk about that more in terms
2 of how that's put together.

3 Q. Exhibit 43 consisting of I believe three pages here.

4 Do you recognize the rest of this e-mail chain or
5 information?

6 A. I was copied on a response, but I wasn't as familiar. I
7 believe this was something from -- Doe had sent something to
8 Office of Community Standards, and they had responded.

9 Q. Okay. Do you know why Jane Roe motioned to dismiss the
10 protective order?

11 A. I don't have any information about that at this point.

12 Q. Okay. Exhibit 44, can you tell us what that is?

13 A. That looks like the -- one of the initial e-mails from the
14 resource coordinator/care consultant from October. I had asked
15 Danny to complete our binder, so she made sure we had copies of
16 that for documentation.

17 Q. All right.

18 A. Looks like an initial e-mail to try and schedule a
19 meeting.

20 Q. I want to ask you a couple questions here about -- you
21 mentioned some things already about Ann Eaton -- or is it
22 Annie Eaton?

23 A. Uh-huh.

24 Q. And she's a care consultant?

25 A. Yes, sir.

1 Q. And the role of that person is to do what?

2 A. To help facilitate resources for staff -- I'm sorry, no,
3 for students and, sort of, regular everyday, sort of, concerns.
4 So that could be academically or if they had a medical concern
5 or what have you. She also served as resource coordinator.

6 Q. That person is assigned to a specific student?

7 A. A care consultant is assigned to the college that they
8 attend typically.

9 Q. And are they assigned in connection with Title IX claims
10 or just in general?

11 A. General. So it might not have anything to do with
12 Title IX.

13 Q. But can they do something with Title IX? Do they assist
14 in that process?

15 A. They also act as resource coordinators, so they can be
16 assigned as a resource coordinator as well.

17 Q. Okay. And do you know whether a comparable coordinator
18 was assigned to John Doe?

19 A. I do. Anna Detlefsen was his resource coordinator. Is
20 also a care consultant.

21 **THE COURT:** What was her name?

22 **THE WITNESS:** Anna Detlefsen.

23 **BY MR. AGOSTINO:**

24 Q. Would she be expected to provide comparable services to
25 John as Annie Eaton provided to Jane?

1 **A.** It is pretty situational depending on student need, so
2 they are required to initiate contact once they learn who that
3 person is and really kind of respond as they're contacted by
4 that person, so complainant or respondent. It could vary from
5 student to student.

6 **THE COURT:** Mr. Agostino, how much longer do you
7 think you'll have with this witness?

8 **MR. AGOSTINO:** Realistically, Your Honor, I would say
9 probably another 15 minutes.

10 **THE COURT:** All right. Why don't we try to get it
11 done before lunch.

12 **MR. AGOSTINO:** Okay.

13 **BY MR. AGOSTINO:**

14 **Q.** I want to ask you some questions about this investigative
15 investigator in this case, which is Lynn Kalamaros, correct?

16 **A.** Yes.

17 **Q.** At some point you assigned a task to her to contact
18 witnesses and the complainant and respondent and to take
19 statements, is that correct?

20 **A.** Yes.

21 **Q.** How are those statements taken? Are they --

22 **A.** Typically she schedules a meeting based on their schedules
23 because they are students, and so we'll work with them. She
24 tries to meet with complainants and respondents at least
25 initially in person and then would work with witnesses maybe if

1 they didn't want to meet in person to talk over the phone or
2 what have you.

3 Q. And she provides you then a report, and I'm not marking it
4 as an exhibit here. But does that appear to be the report?

5 A. It does.

6 Q. Okay. And to that she summarizes her findings, is that
7 correct?

8 A. She does.

9 Q. All right. And as you mentioned, she's an attorney. She
10 practiced for a number of years, is that correct?

11 A. Yes.

12 Q. At least more than 10 I believe.

13 A. I'm not sure, but I'm guessing, sure.

14 Q. She's been working with your office doing investigations
15 for five years?

16 A. Since 2011, so a little over. Apparently my math was bad
17 earlier. I apologize.

18 Q. Seven years?

19 A. Yes. Little bit longer.

20 Q. And she provided you on page 2 a summary of the
21 information she obtained in February of 2017, is that correct?

22 A. Yes.

23 Q. And in the summary she reports that Doe reports that if
24 Student A asked him to stop contacting her, she would change
25 her mind and reach out to them. Do you see that?

1 A. Yes.

2 Q. Okay. Did you see evidence of that too as you reviewed
3 the information she provided?

4 A. Yes.

5 Q. Okay. And it also in her summary includes a statement
6 that Doe reports that Student A encouraged him to reach out to
7 her if he felt suicidal. Do you see that?

8 A. I'm sorry. Reading that part.

9 THE COURT: Will you just point to where you are
10 referencing.

11 MR. AGOSTINO: Right here.

12 THE WITNESS: Yes. Thank you.

13 BY MR. AGOSTINO:

14 Q. Okay. Do you see that?

15 A. Yes.

16 Q. You found that to be true as well as you reviewed the
17 detailed information?

18 A. That's what Doe reported, yes.

19 Q. Okay. But did you find that consistent with that there
20 was evidence that Jane did encourage John to reach out to her?

21 A. I would have to look at specific texting, but I seem to
22 recall that happening, but I'm not sure off the top of my head.

23 Q. Would it be fair to say it was a somewhat confusing
24 situation?

25 A. I think they both were trying to figure out what was going

1 on with that, so there was a lot of information presented.

2 Q. Exhibit 45, can you tell us what that is?

3 A. Can you scroll down. I'm sorry. I apologize.

4 Yes, that appears to be another e-mail from Roe's mother.

5 **THE COURT:** How do you mark this? Exhibit what?

6 **MR. AGOSTINO:** Forty-five, Your Honor.

7 **BY MR. AGOSTINO:**

8 Q. She continues to be upset, is that correct?

9 A. Yes.

10 Q. And it appears on here she's copying the president of the
11 faculty?

12 A. Yes. That's the e-mail address. I don't know that's a
13 live e-mail address.

14 Q. She's also copying William Stackman?

15 A. Uh-huh.

16 Q. Who is S. Smith?

17 A. I believe that is the deputy chief of police.

18 Q. And Keri Kei, that is the chief?

19 A. Yes, sir.

20 Q. Exhibit 46, can you tell us what that is?

21 A. Yes. That is an e-mail from me to Lynn about a student
22 who says she did not want to participate as a witness.

23 Q. Okay. Did you respond to her?

24 A. I believe I told her not to worry about contacting her
25 because the student explicitly told me she did not want to

1 participate.

2 Q. Do you know what information that student had?

3 A. I don't.

4 Q. Still on Exhibit 46. In --

5 A. Oh, sorry.

6 Q. Yeah. So pointing up here where it says, "Also in his
7 e-mail to you Doe asks about filing a harassment claim"?

8 A. Yes.

9 Q. Okay. Did you respond to her about that?

10 A. I believe I responded to him directly about that at some
11 point in an e-mail.

12 Q. Okay. About filing that?

13 A. Yes.

14 Q. Do you remember what you told him?

15 A. I believe I told him that making a report wasn't
16 inherently harassment; but as we looked at the investigation,
17 we could learn more and determined if there were any concerns
18 about the accuracy or truthfulness of that report. This is in
19 reference to the second administrative investigation if I
20 recall.

21 Q. And this is the complaint by Doe against Roe?

22 A. So Roe -- so let me go back. So Roe --

23 **THE COURT:** Hang on one second. Let me read this.

24 **THE WITNESS:** Sure. That is fair.

25 **THE COURT:** Okay. Go ahead.

1 **THE WITNESS:** As I mentioned earlier, Roe -- actually
2 -- yes. I'm looking at the date. I want make sure I am not
3 confusing -- because there were a couple that went back and
4 forth.

5 Roe in mid-February made an allegation that Doe had shared
6 that medical information with that group. Roe had also alleged
7 retaliation -- and, again, I'm not sure about the timeline, so
8 I would have to look at the e-mails -- of personal property, a
9 laptop had been damaged as retaliation as well in that process.
10 And so that's why that investigation was initiated, or it was
11 added to that piece. And then this e-mail is looking at a
12 respondent -- or, I'm sorry, a witness who was a part of that
13 first retaliation allegation who was actually the person who
14 informed her of that issue; so she was present when the medical
15 information may have been shared. I know it is convoluted, but
16 does that make sense?

17 **THE COURT:** Not really. I mean, I'm just sitting
18 here wondering at what point does this become, sort of,
19 farcical. I mean, it's just this kind of -- and how you are
20 processing this, I'm not at all being critical, because to me
21 your job sounds to me exceedingly difficult. But there's just
22 this steady stream of, oh, yeah, well, what about this, oh,
23 yeah, well, what about that. And this is just going back and
24 forth. I mean, am I seeing this right?

25 **THE WITNESS:** It can on occasion. It doesn't happen

1 like that all the time.

2 **THE COURT:** Was it on this occasion?

3 **THE WITNESS:** On this one, we had some of those, sort
4 of, additional complaints coming in, so that's not necessarily
5 always the case.

6 **THE COURT:** I'm not particularly concerned about
7 other cases. I'm concerned about this one.

8 **THE WITNESS:** Right.

9 **THE COURT:** And how my reaction to it is that it's --
10 well, it just becomes farcical. I don't know, but, anyway.

11 Go ahead, Mr. Agostino.

12 **MR. AGOSTINO:** Obviously trying to speed things up.
13 Maybe I'll make a group exhibit.

14 I'd like to approach the witness if I may, Your Honor.

15 **THE COURT:** Sure.

16 **BY MR. AGOSTINO:**

17 **Q.** Show you a group of e-mails I've marked as Exhibit 47.

18 Tell me if you recognize those. These are all Bates stamped by
19 University of Notre Dame.

20 **A.** Okay.

21 **Q.** My question is: Are those true copies of e-mails that
22 relate to the second investigation?

23 **A.** Okay. Let me look, please. Thank you.

24 **Q.** Sure.

25 **MR. LEICHTY:** Mr. Agostino, do you have a second copy

1 of that by chance?

2 **MR. AGOSTINO:** I don't, but they are in all your
3 Bates stamp.

4 Your Honor, while she's looking at the exhibit, I offer
5 into evidence Exhibits 20 through 46.

6 **THE COURT:** Any objection?

7 **MR. LEICHTY:** No, Your Honor.

8 **THE COURT:** All right. All of those exhibits, 20
9 through 46 inclusive, are now admitted.

10 (Plaintiff's Exhibit Nos. 20 - 46, previously marked, were
11 received into evidence.)

12 **THE COURT:** Are you going to have a lot more
13 questions?

14 **MR. AGOSTINO:** I do not.

15 **THE COURT:** Why don't we just break for lunch, and
16 you can review them at your convenience over the lunch hour.

17 Just so I understand, is it your intention then to just
18 question this witness on cross, or are you going to recall her
19 in your case? It might be better to do it now.

20 **MR. LEICHTY:** I prefer to be efficient, Your Honor.

21 **THE COURT:** I do too.

22 Why don't we pick back up here at 1:15, and we'll pick up
23 with the examination of this witness at that time. So we'll
24 see you in about 55 minutes.

25 (A recess was had at 12:20 p.m.)

1 (The following proceedings were held in open court
2 beginning at 1:22 p.m., reported as follows:)

3 **DEPUTY CLERK:** All rise.

4 **THE COURT:** All right. You can be seated. All
5 right. Everybody ready to proceed? Where is Ms. Ryan?

6 Were you going to pass the witness, or did you have a
7 couple questions?

8 **MR. AGOSTINO:** I have a couple questions, but at this
9 time I was going to offer Plaintiff's Exhibit 47 under seal for
10 consideration by the Court.

11 **THE COURT:** Okay. And what is -- just generally
12 describe Exhibit 47.

13 **MR. AGOSTINO:** These are not all but some documents
14 relating to the second administrative investigation file, and
15 it is a series of e-mails and other documents relating -- or
16 coming out of that what's an active or open file.

17 **THE COURT:** When you are saying the second one, are
18 you saying the second one against John Doe, or the one against
19 Jane Roe?

20 **MR. AGOSTINO:** This we consider the one against
21 Jane Roe.

22 **THE COURT:** Okay. Fair enough.
23 Do you have any objection to that?

24 **MR. LEICHTY:** No. Just one point of clarification.
25 There's actually allegations as against both Ms. Roe and

1 Mr. Doe.

2 **THE COURT:** But they have kind of combined into one
3 proceeding?

4 **MR. LEICHTY:** In that second investigation, right,
5 and because it is ongoing, that's why we suggested to filing
6 these under seal.

7 **THE COURT:** Okay. I will admit exhibit -- I assume
8 you have no objection?

9 **MR. LEICHTY:** No objection.

10 **THE COURT:** We'll admit Exhibit 47, and we'll do
11 so -- that will remain under seal.

12 (Plaintiff's Exhibit No. 47, previously marked was
13 received into evidence.)

14 **MR. AGOSTINO:** Your Honor, to speed things along,
15 we're also offering Plaintiff's Exhibits 48 through 55.
16 Forty-eight is an e-mail from Ann Eaton to Jane Roe regarding
17 accommodation requests. Forty-nine is another e-mail from Ann
18 Eaton to Jane Roe regarding identifying herself as resource
19 coordinator.

20 **THE COURT:** Could you speak up, sir.

21 **MR. AGOSTINO:** Sure. Fifty is another e-mail, an
22 exchange between Ann Eaton and Jane Roe. Fifty-one is a letter
23 to Jane Roe dated December 29, 2016, from Heather Ryan
24 regarding the -- moving forward with the investigation of the
25 first charge. Fifty-seven is an e-mail exchange between --

1 **THE COURT:** Just so I'm clear, you skipped from 51 to
2 57, is that correct?

3 **MR. AGOSTINO:** Oh, I did? I did not read my own
4 writing well, Your Honor.

5 **THE COURT:** It is 52?

6 **MR. AGOSTINO:** Fifty-two.

7 **THE COURT:** All right.

8 **MR. AGOSTINO:** Better make that better. So 52 is
9 e-mails between Ann Eaton and Heather Ryan relating to checking
10 in on Jane Roe. Fifty-three is an e-mail of November 30 from
11 Heather Ryan to John Doe. Fifty-four is an e-mail of April 20,
12 2017, from Ann Detlefsen to Heather Ryan and Julie Goen
13 regarding John Doe. And 55 is an e-mail between John Doe and
14 Anna Detlefsen dated January 26, 2017, regarding a request for
15 accommodation on classes.

16 **THE COURT:** Okay. You pass the witness -- well, do
17 you have any objection to any of those exhibits?

18 **MR. LEICHTY:** No objection, Your Honor.

19 **THE COURT:** So those are all admitted, that's 48
20 through 55 inclusive.

21 (Plaintiff's Exhibit Nos. 48-55, previously marked, were
22 received into evidence.)

23 **MR. AGOSTINO:** And I will pass the witness, Your
24 Honor.

25 **THE COURT:** All right. Thank you, sir. Mr. Leichty.

CROSS-EXAMINATION

BY MR. LEICHTY:

Q. Mrs. Ryan, good afternoon.

A. Good afternoon.

Q. I'm going to park myself up here if that's all right because we're going to go through a few exhibits.

I'd like to get a little more background about you, Ms. Ryan. We know you are the Deputy Title IX Coordinator and have been for a certain period of time. How long have you actually been at the University of Notre Dame?

A. I have been at the University of Notre Dame for five-and-a-half years.

Q. And before you were the Deputy Title IX Coordinator, what was your role at Notre Dame?

A. I was an Assistant Director in the Office of Community Standards.

Q. And how long had you worked in higher education, whether that was Notre Dame or in prior employment?

A. Seventeen years. Sorry.

Q. We don't have to go into a lot of detail; but if you would, acquaint the Court with some of your prior higher education experience before you joined Notre Dame.

A. Sure. So after post-graduate degree, I was a resident director, hall director at two different institutions for several years. That meant that I worked with crisis

1 management, working with students who were responding to issues
2 or needed to get to the hospital, that kind of thing, you
3 probably have seen that before, but then also worked as an
4 Assistant Director and Director of Resident Life at the Art
5 Institute of Chicago where I was primarily working with
6 students who resided on campus but working with getting them
7 support services and whatnot as well, crisis work.

8 Q. And when did you move to South Bend?

9 A. I moved back to South Bend -- I grew up in the area -- not
10 South Bend proper -- but summer of 2008 to, sort of, help with
11 family things that were going on.

12 Q. And then approximately around that time did you join Notre
13 Dame in Office of Community Standards?

14 A. A short while later, yep.

15 Q. And did you do anything else while you were -- before you
16 joined Notre Dame when you were back in South Bend?

17 A. Yes, I was actually a registrar at Brown Mackie College in
18 South Bend.

19 Q. If you would, introduce your educational background to the
20 Court?

21 A. Sure. My undergraduate degree is in interpersonal and
22 public communication from Central Michigan University, and my
23 graduate degree is a Master of Education specifically in
24 college student affairs leadership from Grand Valley State
25 University.

1 Q. Aside from your undergraduate and post-graduate work, have
2 you had training specific to the handling of Title IX issues?

3 A. Yes, sir. Several over the years. In the last two years,
4 I can count at least five different trainings that I have
5 participated in, most of which have been from outside partners
6 sharing that information. Have participated in the Association
7 for Student Conduct Administration, a 4-day intensive, fall
8 2015, and some more recently as well in terms of the
9 Association for Title IX Administrators for certification for
10 investigators, and some other, sort of, regional trainings as
11 well.

12 Q. Have you had the opportunity to present on Title IX
13 issues?

14 A. Yes. I have been asked to participate in panels to talk
15 about best practices when working with Title IX administration
16 and investigations regionally and then at national conferences
17 including the legal issues of higher education conference and
18 University of Vermont.

19 Q. Have any of those presentations dealt specifically with
20 the procedures Notre Dame has utilized in addressing these
21 types of complaints?

22 A. They have, actually, very specifically noting our entire
23 process from beginning to end, including administration of
24 initial reports, tripartite process through resource
25 coordinators all the way through conduct process and decisions.

1 Q. How is it that the subject of Notre Dame's procedures has
2 become a topic in these presentations?

3 A. In many ways we are seen as leader in this area because we
4 have a relationship with OCR and have been able to learn from
5 that and then continue to develop processes in accordance with
6 expectations.

7 Q. I know we've talked somewhat about your responsibility as
8 a Deputy IX Coordinator, and we will eventually here turn to
9 the specific subject of this case. Can you at least give an
10 overview to the Court as to when you first become involved in,
11 say, a Title IX investigation and then when you ultimately hand
12 the project off to the next body in the process.

13 A. Sure. So after -- when I receive an initial report, I
14 meet with the person who's making the allegation to learn more
15 about what is happening or what they are alleging. And based
16 on whether or not that is possibly a policy violation, then I
17 actually will talk through what their next steps could be. So
18 as -- if they have information about their respondent and they
19 want to share that at that time, then they have the opportunity
20 to request that they pursue an administrative investigation or
21 a tripartite board requesting that they not pursue an
22 administrative investigation at that time.

23 After that point, if they say yes they would like for it
24 to go forward, then I contact the respondent, inform them of
25 the allegations and resources and, sort of, provide the same

1 information as I do with the complainant. It is actually all
2 the same content in terms of a meeting, initially, put a no
3 contact order in place, and then the investigator would contact
4 parties appropriately and share information.

5 **Q.** What is *du lac* to Notre Dame?

6 **A.** *Du lac* is a collection of information that would be
7 helpful as a student in the community, actually for anybody in
8 the community. It has five sections, one of which is about the
9 standards of conduct.

10 **MR. LEICHTY:** Your Honor, I put on the ELMO here
11 Exhibit 121. I have one for Your Honor, if I may approach?

12 **THE COURT:** Sure.

13 **MR. LEICHTY:** Just in case I don't zoom in or zoom
14 out appropriately here.

15 **BY MR. LEICHTY:**

16 **Q.** So, Ms. Ryan, are you able to see this chart all right?

17 **A.** Yes.

18 **Q.** Okay. As you review the information here, does this
19 accurately reflect the procedure, at least generally speaking,
20 that Notre Dame followed with respect to this case involving
21 Mr. Doe and Ms. Roe?

22 **A.** Generally. And, obviously, I don't have the dates in
23 front of me, but, yes.

24 **Q.** All right. So here in the middle section you see where it
25 starts off with conduct, incident, occurrence, presented,

1 reported there at the top in the middle?

2 A. Yes.

3 Q. And you talked a little bit about that this morning in
4 terms of Ms. Roe reporting a situation and that being
5 considered by the tripartite board, right?

6 A. Yes.

7 Q. At some point she makes a decision to proceed with
8 administrative investigation, correct?

9 A. Yes.

10 Q. All right. So off to the left-hand side there, the column
11 on the left, you see the investigation column there?

12 A. Yes.

13 Q. Could you walk the Court through the process that was
14 followed in terms of the administrative investigation?

15 A. So initially I learned about the initial report from --
16 very vaguely from the care consultant, the nonconfidential
17 resource, and met with Roe and determined that the behavior
18 alleged could possibly be a violation. And so she informed me
19 at that time that she didn't wish to move forward, and so it
20 was referred to the tripartite board to determine if the
21 University could agree to that request.

22 And then after that it was on, I think it was
23 October 27th based on that date there, that she was
24 informed -- or I notified her that she had six months to change
25 her mind about that, which is in accordance with our process

1 that if someone closes it and the University is able to agree
2 to that, they have six months to change their mind about that
3 and inform me they would like to re-open a case.

4 On November 28th I was contacted -- or recontacted and
5 actually initiated that investigation and then issued no
6 contact orders once I had met with Mr. Doe. And once we went
7 forward, actually talked through those pieces, and then that's
8 noting what would occur during that administrative
9 investigation with Lynn Kalamaros, and then it was concluded in
10 February.

11 **Q.** Okay. And we'll talk a little bit more about these stages
12 in more details with some other exhibits.

13 As part of the administrative investigation, are both
14 Mr. Doe and Ms. Roe afforded the opportunity to make personal
15 statements to you?

16 **A.** They can share information initially with me, and then
17 typically I will share any information I receive with the
18 investigator.

19 **Q.** Did you, in fact, meet with both Ms. Roe and Mr. Doe
20 separately?

21 **A.** Yes.

22 **Q.** Okay. Are they given the opportunity under *du lac* to
23 provide documentation that they want either your office or OCS
24 to consider in evaluating the complaints?

25 **A.** Yes. There are two separate spaces for that. One is

1 through the investigation and then Office of Community
2 Standards would be able to talk more about what their actual
3 process is, but *du lac* does note that opportunity.

4 Q. Are the two individuals, Ms. Roe and Mr. Doe, advised of
5 the opportunity to identify witnesses?

6 A. Yes.

7 Q. And is that part of the investigation, the administrative
8 investigation that then Ms. Lynn Kalamaros undertakes on behalf
9 of Notre Dame?

10 A. Yes.

11 Q. So if there's a witness identified, then she can interview
12 that witness to obtain information relevant to the claims,
13 right?

14 A. Yes.

15 Q. Once this administrative investigation process is
16 concluded and this moves to OCS, do you have any further
17 involvement in the process at that point?

18 A. No. I might learn about where they are in the timeline
19 because I try to maintain records of that, but beyond that I
20 don't make any decisions or whatnot.

21 Q. Once it goes to OCS, you are no longer a decision maker at
22 this point?

23 A. That's accurate.

24 **THE COURT:** Are you ever a witness in the OCS?

25 **THE WITNESS:** No.

1 **THE COURT:** Do you write reports of, like, reports of
2 interviews? So if the complainant is being interviewed, I
3 assume there's a report of interview that's done?

4 **THE WITNESS:** That's included in the documents that
5 we receive through the administrative investigation.

6 **THE COURT:** Does it ever happen where somebody says,
7 I didn't say that?

8 **THE WITNESS:** They actually have an opportunity
9 through the process to confirm the accuracy of that statement.

10 **THE COURT:** Okay. That's before the hearing?

11 **THE WITNESS:** Yes.

12 **BY MR. LEICHTY:**

13 **Q.** Are students when they matriculate into Notre Dame their
14 freshman year oriented to *du lac*?

15 **A.** Yes. So there are a couple different ways that happens,
16 one is through welcome weekend orientation, there's something
17 called building community the Notre Dame way, which has several
18 components or modules that share information about different
19 expectations for the University, and there's some follow-up
20 facilitation that occurs as well. When, sort of -- in small
21 groups talking through those policies relating to Title IX,
22 specifically, and then *du lac* has some other pieces that Office
23 of Community Standards might be able to talk about how they
24 communicate additional pieces as reminders.

25 **Q.** Is *du lac* located somewhere where students can easily

1 access it?

2 A. Yes, it is online.

3 Q. Ms. Ryan, are you able to see that there, Exhibit 101?

4 A. I am, yes.

5 Q. Could you tell the Court what that is, please?

6 A. That is actually the Standards of Conduct page from *du*
7 *lac*.

8 Q. And what's the purpose of the Standards of Conduct page
9 for *du lac*?

10 A. That is the introduction into standards of conduct which
11 are, sort of, expectations for student behavior at the
12 University.

13 Q. What's the importance of standards of conduct at the
14 University of Notre Dame?

15 A. As every institution, we have values that we want our
16 students to live by and, sort of, behavior that is the
17 expectation for how we behave within our community, and this
18 helps communicate those expectations to students.

19 Q. Let's turn to page 2 here. We see the section entitled
20 Articulation of the University Standards of Conduct?

21 A. Yes.

22 Q. We've highlighted two bullets. Are those two bulleted
23 standards relevant to this matter involving Mr. Doe?

24 A. They are, yes.

25 Q. In what way?

1 **A.** So the first bullet, if I recall correctly, was one of the
2 policy questions as a part of the conduct process. The second
3 bullet is actually the allegation that Doe made against Roe in
4 terms of, I believe, there were some videos submitted.

5 **Q.** Are these -- as I understand it at the University of Notre
6 Dame, we don't call these charges. We call these policy
7 questions, right?

8 **A.** Yes.

9 **Q.** Okay. Are these two of the policy questions that were at
10 issue with respect to this administrative investigation and OCS
11 hearing involving Mr. Doe?

12 **A.** I believe -- I would have to double-check the letter, but
13 I believe the first policy question, the abusive or harassing
14 behavior was included in that; and willful damage, to my
15 recollection, is actually what is a part of our second
16 administrative investigation.

17 **MR. LEICHTY:** Your Honor, at this time we move for
18 the admission of Exhibit 101.

19 **THE COURT:** Any objection?

20 **MR. AGOSTINO:** No.

21 **THE COURT:** All right. It is admitted.

22 (Defendant's Exhibit No. 101, previously marked, was
23 admitted in evidence.)

24 **BY MR. LEICHTY:**

25 **Q.** What's that, Ms. Ryan?

1 A. That is the red book which contains information about
2 policies and procedures related to sexual harassment at large
3 as a component of *du lac*.

4 Q. Why do we call it red book?

5 A. It is reddish.

6 Q. Changes every year?

7 A. It does, yes.

8 MR. LEICHTY: Permission to approach, Your Honor.

9 THE COURT: Sure.

10 BY MR. LEICHTY:

11 Q. This is a document that Notre Dame maintains in its usual
12 course on an annual basis, right?

13 A. Yes.

14 MR. LEICHTY: Your Honor, we move for the admission
15 of Exhibit 107.

16 THE COURT: Any objection?

17 MR. AGOSTINO: No.

18 THE COURT: It is admitted.

19 (Defendant's Exhibit No. 107, previously marked, was
20 admitted in evidence.)

21 BY MR. LEICHTY:

22 Q. Ms. Ryan, you see a provision there on page 6 of the red
23 book involving dating violence?

24 A. Yes. Can you move it up. I believe page 6 is on the
25 left. I didn't see the page. Thank you.

1 Yes.

2 Q. How is dating violence defined in the red book?

3 A. "Dating violence is defined as physical violence or the
4 threat of physical violence committed by a person who is or who
5 has been in a social relationship of a romantic or intimate
6 nature with an individual."

7 Q. And was that one of the policy questions that was at issue
8 in the OCS process?

9 A. That was one of the policy issues that were initially --
10 initiated the initial investigation but was not -- it was a
11 question in the OCS process.

12 Q. All right. Over here on page 7 you see a definition of
13 stalking?

14 A. Yes.

15 Q. What's the definition of stalking?

16 A. "Stalking is defined as knowingly or intentionally
17 engaging in a course of conduct involving repeated or
18 continuing harassment of another person that would cause a
19 reasonable person to feel terrorized, frightened, intimidated,
20 or threatened, and that actually causes the individual to feel
21 terrorized, frightened, intimidated, or threatened."

22 Q. Was that one of the policy questions that was at issue, I
23 guess, both in the administrative investigation and in the OCS
24 process?

25 A. That was a question, yes.

1 Q. All right. Is *du lac* ever updated by the University?

2 A. There is an annual review of the policies related to
3 *du lac* and procedures.

4 Q. And are you involved in that process to review *du lac* and
5 update it as needed?

6 A. I am actively involved.

7 Q. How many other people are involved in that review process?

8 A. Probably five or eight. I would have to double-check the
9 group, but I think about eight of us.

10 Q. Generally speaking, what types of offices or departments
11 at the University of Notre Dame bring expertise to bear on that
12 review process?

13 A. As the Deputy Title IX Coordinator, I participate. The
14 Director of the Office of Community Standards participates, and
15 some staff will assist in that process, as you might imagine.
16 My supervisor as the Assistant Vice President for Student
17 Services. The person who supervises the OCS area oversees that
18 space. The Associate Vice President for Student Development
19 participates in that process. Counsel participates in that as
20 well, as well as the Title IX Coordinator Karrah Miller.

21 Q. What's the purpose for doing an annual review of *du lac*
22 and its procedures?

23 A. One, we learn things every year about behavior and, sort
24 of, how we can do things better for efficiency; but also
25 guidelines have shifted every year or there have been different

1 things that, sort of, move forward so we can continue to be
2 compliant with those pieces.

3 Q. So if this is, in fact, an ever-evolving area of the law
4 or concern then does Notre Dame try to keep up to date with
5 that area?

6 A. Yes.

7 Q. Now, I understand from your testimony this morning that
8 you met with Ms. Roe, correct?

9 A. Yes.

10 Q. And that was in October 2016?

11 A. Yes.

12 Q. All right. And give me, again, if you would, please, a
13 sense of the discussion that you have initially with Ms. Roe?

14 A. Initially, she had a concern about the nature of the texts
15 and had some concerns about Doe harming himself in that context
16 but also felt like they were slightly manipulative and then in
17 that space decided that she wanted him to get assistance more
18 than she wanted him to have a conduct response at that point.

19 Q. And as I understand it, this is when we have the
20 conversation about whether she should proceed forward with the
21 administrative investigation or whether that should be
22 considered later as this goes to the tripartite board, right?

23 A. Yes.

24 Q. Okay. And at some point she comes back to you to indicate
25 she wants to proceed with the administrative investigation?

1 A. Yes. I think that was also precipitated by an additional
2 interaction in November.

3 Q. In the interim period, do you have any communication with
4 Mr. Doe?

5 A. No.

6 Q. Does anyone else, to your knowledge, have communication
7 with Mr. Doe?

8 A. Dr. Bill Stackman had communication with Mr. Doe.

9 Q. So I'm showing you what's been marked Exhibit 104, and
10 this is a series of e-mails.

11 So I'm going to, with Your Honor's permission, approach
12 the witness to provide a copy?

13 THE COURT: Sure.

14 MR. AGOSTINO: Your Honor, I'm going to object
15 because I don't think we've seen this particular document,
16 number one; and number two, the witness testified this morning
17 that she was not aware at all of what the discussion was
18 between Mr. Stackman and Mr. Doe.

19 THE COURT: Overruled.

20 Proceed.

21 MR. LEICHTY: Permission to approach, Your Honor?

22 THE COURT: Sure.

23 BY MR. LEICHTY:

24 Q. Ms. Ryan, have you had a chance to flip through the
25 e-mails here attached as Exhibit 104?

1 A. Yes.

2 Q. You see they are Bates numbered there at the bottom?

3 A. Yes.

4 Q. Marked confidential?

5 A. Yes.

6 Q. You are aware this is part of our production we made this
7 week?

8 A. Yes.

9 Q. On the first page we see William Stackman, Dr. William
10 Stackman's e-mail address, right?

11 A. Yes.

12 Q. For an e-mail dated October 14, 2016?

13 A. Yes.

14 Q. And then I see a BCC there. Do you see that?

15 A. Yes.

16 Q. Is that your e-mail address?

17 A. That is, yes.

18 Q. Were you copied on these communications involving
19 Dr. Stackman?

20 A. Yes, I was copied on these communications.

21 Q. All right. And, of course, the Court will have the
22 opportunity to read through these, but what was the reason for
23 Dr. Stackman, as you have reviewed these e-mails, reaching out
24 to Mr. Doe?

25 A. This was in an effort to contact him because there were

1 concerns about the statements he had made via text to Roe.

2 Q. All right. Let's look at a couple of these.

3 See the e-mail at the bottom, October 14, 2016?

4 A. Yes.

5 Q. All right. This is a communication from Dr. Stackman to
6 Mr. Doe, right?

7 A. Yes.

8 Q. And he's inviting an immediate meeting with the student,
9 correct?

10 A. Yes.

11 Q. And as part of that communication do you see an
12 instruction to break off all forms of communication and
13 personal contact with Student A who we know to be Ms. Roe?

14 A. Yes.

15 Q. Is that standard operating procedure in light of the
16 circumstances of this case?

17 A. Yes.

18 Q. I don't intend to jump over the other e-mail here, but
19 there's at least a discussion about coordinating the meeting.
20 And then we see another e-mail to Mr. Doe from Dr. Stackman,
21 you see that there?

22 A. Yes.

23 Q. This one is 4:35 on October 14, 2016?

24 A. Yes.

25 Q. And he describes the purpose of the meeting that he's

1 proposing with Mr. Doe, correct?

2 A. Yes.

3 Q. Which is two-fold as he describes it, you see that?

4 A. Yes.

5 Q. "I would like to further discuss the nature and reason for
6 my no contact request." You see that?

7 A. Yes.

8 Q. "And, secondly, I would like to understand and discuss
9 ways in which the University may best support you." You see
10 that?

11 A. Yes.

12 Q. Okay. Did you have any discussions with Dr. Stackman
13 about that second component?

14 A. I had a discussion with him prior to this to let him know
15 about the concerns, and actually Annie Eaton was the person
16 that coordinated that initial contact or let him know about
17 that.

18 Q. What was your understanding in terms of what -- why there
19 was this second purpose to reach out to Mr. Doe?

20 A. Because he had been making statements that he was going to
21 kill himself.

22 Q. And so was the University trying to make an effort to
23 provide services to the student?

24 A. Yes.

25 Q. Did you have a conversation with Dr. Stackman after he met

1 with Mr. Doe in this -- at this particular time?

2 **A.** No. I mean, he mentioned he had met with him, but that
3 was about all that was shared.

4 **Q.** All right.

5 **A.** So I don't know about the specifics.

6 **MR. LEICHTY:** Your Honor, at this time we move for
7 the admission of Exhibit 104.

8 **THE COURT:** Any objection beyond what you have
9 already said, Mr. Agostino?

10 **MR. AGOSTINO:** Not beyond what I have already said.

11 **THE COURT:** I'm going to overrule the objection and
12 admit Exhibit 104.

13 (Defendant's Exhibit No. 104, previously marked, was
14 admitted in evidence.)

15 **BY MR. LEICHTY:**

16 **Q.** Now, once Ms. Roe makes the determination that she wants
17 to proceed with the administrative investigation, how soon
18 thereafter do you reach out to Mr. Doe?

19 **A.** I believe I reached out that same day pretty quickly
20 afterwards.

21 **Q.** And what did you share with him in this regard?

22 **A.** My initial e-mail -- and I would have to look at it
23 specifically -- but the e-mails typically say, if I recall
24 correctly, say I need to meet with you about a matter that you
25 may have information about.

1 Q. And did you, in fact, meet with him?

2 A. I did.

3 Q. Do you recall how soon thereafter you met with him?

4 A. I believe it was the next day.

5 Q. So let's walk through the process you follow when you meet
6 with a respondent, and I want to speak specifically about this
7 particular case. So do you have an in-person meeting with
8 Mr. Doe?

9 A. I did.

10 Q. What do you and Mr. Doe discuss in the course of this
11 meeting?

12 A. I went over the -- that red book actually page by page
13 and, sort of, talked through all the pieces of the process,
14 talked about resources, talked about the fact that I was going
15 to assign a resource coordinator and actually knew who that
16 person was at that time.

17 Q. Let me hold you there just one moment. So you go over
18 this red book we marked as Exhibit 107?

19 A. Yes.

20 Q. Do you go through it page by page with Mr. Doe?

21 A. Yes.

22 Q. Do you discuss specific sections of the red book?

23 A. Yes.

24 Q. All right. Is there anything that you leave out as you go
25 through this red book with Mr. Doe?

1 A. No.

2 Q. How long was the meeting with Mr. Doe?

3 A. I think it was between 30 minutes and an hour.

4 Q. Okay. And is this meeting held in your office?

5 A. It is held in a room adjacent to my office.

6 Q. All right. I interrupted you. Other than going through
7 the red book page by page with Mr. Doe, what else do you
8 discuss with him?

9 A. I talk about decision points and points where he can share
10 information about his perspective on the interactions. So the
11 entire process, it tries to give students agency in terms of
12 owning their experience and sharing that experience, and so
13 shared with him explicitly about what he could share during the
14 administrative investigation and then also what he could
15 clarify -- or the opportunity to clarify through a conduct
16 process should we get to that point.

17 Q. Let's talk about this -- let's break that down a little
18 bit. When you talk about what he can share, what Mr. Doe can
19 share as part of this administrative investigation process,
20 what do you tell him that he can share?

21 A. Everything that is important to these concerns, and so
22 sharing his perspective on the interactions. He can share any
23 documentation. So if there are text messages, other types of
24 interactions via social media, what have you, he can provide
25 information about witnesses, any other additional documentation

1 that he thinks would be helpful as we're navigating this
2 matter.

3 Q. I'm on page 27 of page 107. You see this category
4 entitled "Procedures Entitled to Both the Respondent and
5 Complainant"?

6 A. Yes.

7 Q. Is this something you also reviewed with Mr. Doe during
8 your meeting?

9 A. We talk about the community standards a little bit more
10 blanketly because Office of Community Standards actually
11 administers that process but shared that that information is
12 all available there.

13 Q. Okay. The Court and all of us can, of course, read
14 through this, but let me touch on a few areas here. Turn to
15 page 28, number seven there, it talks about the opportunity to
16 have an adviser of his or her choice, do you see that?

17 A. Yes.

18 Q. Is that something that you discuss with Mr. Doe at this
19 initial meeting that you had with him?

20 A. Yes, because it pertains to the administrative
21 investigation, any meeting that he would have had with his
22 resource coordinator with me, with anyone, so able to have an
23 adviser present for any of those meetings, so make sure we
24 really cover that.

25 Q. Does Notre Dame assigned an adviser, or does the student

1 get to elect his or her adviser?

2 A. A student gets to elect his or her adviser.

3 Q. Are you aware of whether Mr. Doe chose or elected an
4 adviser on his behalf?

5 A. Yes.

6 Q. All right. Are you aware whether that person participated
7 with Mr. Doe in the administrative investigation process?

8 A. I'm not -- I can't say for sure.

9 Q. All right. Let's look down at number eight.

10 It says, "The opportunity to clarify information presented
11 through the administrative investigation," you see that?

12 A. Yes.

13 Q. What does that concern?

14 A. That is to let complainants and respondents know that they
15 have an additional opportunity to share information and also
16 clarify anything that they are able to review through the
17 administrative investigative report.

18 Q. Okay. Do you discuss at all with Mr. Doe at your meeting
19 whether he can present documents in support of his case?

20 A. Yes.

21 Q. All right. Do you discuss at all with him the opportunity
22 to submit supplemental materials later?

23 A. Yes.

24 Q. All right. And is that what we see here in terms of point
25 number eight in the red book?

1 A. Yes.

2 Q. So what is the -- just out of curiosity, what is this
3 process to present supplemental material for consideration?

4 A. So for the administrative investigation process, that is
5 providing information to the investigator, and so she -- they
6 are all she's -- actually just document that and include that
7 with an investigative summary report. And for conduct process,
8 that's noted there, but Office of Community Standards
9 administers that.

10 Q. And as we read 8A and B here I see there's a process by
11 which the supplemental material can be submitted four calendar
12 days before the administrative hearing and reviewed two
13 calendar days before the administrative hearing. Do you see
14 that?

15 A. Yes.

16 Q. Is that something that you shared with Mr. Doe when you
17 had your initial meeting?

18 A. I probably didn't go into that much detail.

19 Q. On page 29 here you see number 11?

20 A. Yes.

21 Q. Did you discuss with him the opportunity to invite
22 witnesses to participate in the administrative investigation or
23 administrative hearing?

24 A. Through the administrative investigation, yes.

25 Q. Is there any discussion between you and Mr. Doe at this

1 initial meeting about what policy questions were at issue or
2 what he faced?

3 A. Yes.

4 Q. And what did you share with him in that regard?

5 A. I shared that the initial policy question that, sort of,
6 triggered the investigation was dating violence and stalking.

7 Q. I think when I interrupted you a little while ago you were
8 talking about a resource coordinator. Could you explain to the
9 Court what a resource coordinator is?

10 A. A resource coordinator is a staff member who has been
11 trained in our processes and resources available on campus and
12 off campus and is assigned to complainants or respondents. We
13 assign to either party -- or both parties, I guess.

14 Q. And that's something that Notre Dame assigns to the
15 student, correct?

16 A. Yes.

17 Q. Was Mr. Doe assigned a resource coordinator?

18 A. Yes.

19 Q. Who was that?

20 A. Anna Detlefsen.

21 Q. Are you involved at all communications that occur between
22 the resource coordinator and the student, whether that be a
23 respondent or complainant?

24 A. I typically get copies of that communication so that I can
25 record that for our binders and just general documentation, so

1 I might be copied or forwarded later.

2 Q. I'm going to put on the ELMO here Exhibit 119. Again,
3 this is the compilation.

4 May I approach the witness, Your Honor?

5 **THE COURT:** Sure.

6 **BY MR. LEICHTY:**

7 Q. Ms. Ryan, if you will take a moment to review those.
8 Permission to approach, Your Honor.

9 **THE COURT:** Sure. You don't need to ask permission.

10 **MR. LEICHTY:** Old habits.

11 **BY MR. LEICHTY:**

12 Q. Ms. Ryan, have you had an opportunity to review
13 Exhibit 119?

14 A. Yes.

15 Q. Can you tell the Court what that is, please?

16 A. This is correspondence between Anna Detlefsen and Doe.

17 Q. All right. Provide the Court, if you would, a little bit
18 more detail on what the function is of this resource
19 coordinator.

20 A. The resource coordinator is intended to be a person who
21 can answer questions as someone is participating in processes
22 and be able to respond to that and get them to a place where if
23 they need additional resources, sometimes that's getting
24 connected to the counseling center, and what have you.

25 Q. Now, there's been an allegation made in this case that the

1 resource coordinator that was assigned to Mr. Doe was
2 unresponsive. You are aware of that?

3 **A.** Yes.

4 **Q.** Are you aware of anytime in which Ms. Detlefsen had not
5 responded to Mr. Doe?

6 **A.** No.

7 **Q.** All right. And as I understand it, it was typical for you
8 to be copied on communications between them, right?

9 **A.** Yes.

10 **MR. LEICHTY:** Your Honor, at this point I would offer
11 Exhibit 119.

12 **THE COURT:** Any objection?

13 **MR. AGOSTINO:** No, Your Honor.

14 **THE COURT:** All right. It is admitted.

15 (Defendant's Exhibit No. 119, previously marked, was
16 admitted in evidence.)

17 **BY MR. LEICHTY:**

18 **Q.** All right. Ms. Ryan, I've put on the ELMO here
19 Exhibit 115. I'm going to approach and hand you a copy here in
20 case you want to look at the whole thing. Sometimes that ELMO
21 is not as friendly as it looks.

22 What is Exhibit 115?

23 **A.** That is a letter addressed to Roe regarding decisions and
24 resources related to the initial allegation against Doe.

25 **Q.** All right. And we may have looked at this as an exhibit

1 with Mr. Doe's counsel as well, but what's the purpose of this
2 letter to go to Ms. Roe?

3 **A.** To inform her of the relationship with the resource
4 coordinator in case we haven't had that introduction yet; to
5 share the reason we have initiated the investigation is because
6 of the policies that are noted there because it is under, sort
7 of, that umbrella of sexual harassment; and then the roles
8 within the administrative investigation; and then what options
9 are available to them through that -- that process.

10 **MR. LEICHTY:** Your Honor, permission to admit
11 Exhibit 115.

12 **THE COURT:** I think it is already in evidence, so it
13 will be.

14 **MR. LEICHTY:** It may be a duplicate exhibit.

15 **THE COURT:** I believe it is. It is admitted.

16 (Defendant's Exhibit No. 115, previously marked, was
17 admitted in evidence.)

18 **BY MR. LEICHTY:**

19 **Q.** Ms. Ryan, what's Exhibit 116?

20 **A.** That is the letter notifying Ms. Roe that the University
21 agreed to her request to not initiate an administrative
22 investigation and noting that there's a deadline of six months
23 from that date to pursue that.

24 **Q.** All right.

25 **MR. LEICHTY:** I'm not sure we've admitted 116, but,

1 Your Honor, I move for admission of 116.

2 **THE COURT:** It is admitted. I believe it has been
3 admitted previously.

4 (Defendant's Exhibit No. 116, previously marked, was
5 admitted in evidence.)

6 **BY MR. LEICHTY:**

7 **Q.** Ms. Ryan, what's Exhibit 118?

8 **A.** That is a letter to Doe introducing him to his resource
9 coordinator and providing information about the initiation of
10 the administrative investigation as well -- if you can scroll
11 down, I suspect there's also information about the no contact
12 pieces. Yep. And so --

13 **Q.** All right. So is this letter sent to Mr. Doe following
14 your initial meeting with him?

15 **A.** Yes.

16 **Q.** All right. We see it is dated November 29, 2016, right?

17 **A.** Yes.

18 **Q.** In the second paragraph we see the assignment of Ms. Anna
19 Detlefsen as his resource coordinator, right?

20 **A.** Yes.

21 **Q.** Indicates she'll contact him in the next 24 hours to
22 schedule a time to meet. Do you see that?

23 **A.** Yes.

24 **Q.** Does she do that?

25 **A.** Yes.

1 Q. Further down in that second paragraph, Ms. Ryan, you see
2 the sentence that starts, "Please know that the university has
3 many 24/7 resources in place to assist you." You see that?

4 A. Yes.

5 Q. "Including the University Counseling Center and University
6 Health Services." You see that?

7 A. Yes.

8 Q. Was that something that you also discussed with Mr. Doe
9 during your initial meeting?

10 A. Yes.

11 Q. It continues in the letter. "Also your rector and campus
12 ministry can be a support to you," do you see that?

13 A. Yes.

14 Q. Is that something you also discussed with Mr. Doe during
15 your initial meeting?

16 A. Yes.

17 Q. It goes on and says, "I urge you to take advantage of
18 these resources if they would be helpful to you," do you see
19 that?

20 A. Yes.

21 Q. And the third paragraph, it says, "Since the incident
22 alleged may be a violation of the University's policies related
23 to sexual assault, sexual misconduct, dating and domestic
24 violence, stalking, and/or conduct that creates a hostile
25 environment, the University needs to review this report and

1 follow up," do you see that?

2 A. Yes.

3 Q. Are those the policy questions that you discussed with him
4 during your initial meeting?

5 A. Yes. I talk about all of the policy questions but
6 specifically talked about dating violence and stalking.

7 Q. I'm sorry to go through this, but there's been this
8 allegation that somehow Mr. Doe didn't have notice of the
9 policy questions beforehand. Is this the first time that
10 he's -- actually, the second time he's advised of these policy
11 questions at issue?

12 A. Yes.

13 Q. All right. So the first time is during your meeting. The
14 second time is during this letter?

15 A. Yes.

16 Q. All right. And do you point out again to him here in your
17 letter where he can find the policies related to those policy
18 questions?

19 A. Yes.

20 Q. And they are online, right?

21 A. Yes.

22 Q. In the fourth paragraph is Mr. Doe advised that there will
23 be an investigator assigned who may contact him in the near
24 future?

25 A. Yes.

1 Q. And then as you forecasted a little bit ago in the
2 following paragraph, there's an explanation of a no contact
3 order, right?

4 A. Yes.

5 Q. And essentially what's the purpose of the no contact
6 order?

7 A. The no contact order is to, sort of, create space where
8 neither party is having direct, indirect, or third-party
9 contact with one another so they can continue to participate in
10 their environment and also not impact each other's
11 participation in the investigation.

12 Q. Are you aware of contact that Mr. Doe had with Ms. Roe on
13 November 29, 2016?

14 A. Yes.

15 Q. And this involves an incident at her truck, right?

16 A. Yes.

17 Q. Okay. And there's a video that was taken by Ms. Roe of
18 this incident at the truck, correct?

19 A. Yes.

20 Q. Okay. Have you seen that video?

21 A. I have, yes.

22 Q. Was that part of the investigation file?

23 A. It was, yes.

24 Q. Okay. And, of course, the Court and all of us can review
25 the video, but just generally speaking, what transpires in the

1 course of this video?

2 **A.** The -- Roe is approaching her vehicle, and you can see Doe
3 approaching her towards her vehicle. And she asks -- says, no,
4 I don't want to do this right now -- I'm paraphrasing -- and
5 Doe continues to approach and says just wants to talk. And
6 that, sort of, continues for a little bit and doesn't leave
7 immediately after being told a couple of times, and then she
8 enters her vehicle.

9 **MR. LEICHTY:** Do we have that video?

10 **MS. PRUITT:** Yeah, it might take a minute.

11 **MR. LEICHTY:** Sure, take a minute. I'll move on and
12 keep this going.

13 **THE COURT:** Do you remember roughly when that was?
14 When was the video?

15 **THE WITNESS:** I believe it was, actually, before we
16 had the meeting and so --

17 **THE COURT:** Before the no contact order?

18 **THE WITNESS:** Before this no contact order, yes.

19 **THE COURT:** When you say "this," was there a prior
20 one?

21 **THE WITNESS:** I believe that there had been some
22 conversation prior, but I don't know how clear that was in
23 terms of the -- it's documented with the Dr. Stackman e-mail.

24 **THE COURT:** Right. That's what I'm curious about. I
25 saw that Dr. Stackman back in October basically told him, stay

1 away from her.

2 **THE WITNESS:** Uh-huh.

3 **THE COURT:** Did that dissipate once she decided to
4 not go forward with the process?

5 **THE WITNESS:** That's -- it wasn't part of the Title
6 IX process because Dr. Stackman was working as trying to find
7 him support, and so I can't answer that fully.

8 **THE COURT:** Okay. That's sort unrelated to the Title
9 IX process.

10 **THE WITNESS:** Yeah.

11 **THE COURT:** Okay.

12 **BY MR. LEICHTY:**

13 **Q.** I don't want to confuse anything here. In terms of any
14 allegations of no contact violations, whether that was by
15 Mr. Doe or Ms. Roe, ultimately were either one of those charged
16 against them as part of this either administrative
17 investigation or ultimately the hearing itself?

18 **A.** No.

19 **Q.** All right.

20 **A.** Not at all.

21 **Q.** As part of the final result, were either one of them,
22 despite their independent allegations in that regard, were
23 either one of them found responsible for violating the no
24 contact order?

25 **A.** No, not at all. No.

1 **MR. LEICHTY:** If I haven't already, I move for
2 admission of Exhibit 118.

3 **THE COURT:** Any objection?

4 **MR. AGOSTINO:** No.

5 **THE COURT:** It is admitted.

6 (Defendant's Exhibit No. 118, previously marked, was
7 admitted in evidence.)

8 **THE COURT:** You ready to go?

9 **MS. PRUITT:** Yeah.

10 **THE COURT:** I think she's ready to go with that.

11 **MR. LEICHTY:** Okay. Let's watch it.

12 **THE COURT:** Switch it over.

13 (Video played.)

14 **MR. LEICHTY:** I don't think we are having much
15 success.

16 **THE COURT:** I'm getting the drift of it.

17 **MR. AGOSTINO:** We could play it.

18 **MR. LEICHTY:** We have it on DVD. Perhaps we could
19 submit it as an exhibit.

20 **THE COURT:** That would be better. I got the drift of
21 it.

22 **MR. LEICHTY:** What exhibit is it?

23 **MS. PRUITT:** Exhibit 111.

24 **MR. LEICHTY:** We move for admission of Exhibit 111.

25 **THE COURT:** Do you have any objection?

1 **MR. AGOSTINO:** No, Your Honor.

2 **THE COURT:** Exhibit 111 is admitted.

3 (Defendant's Exhibit No. 111, previously marked, was
4 admitted in evidence.)

5 **THE COURT:** For the record, for foundational point of
6 view, is there a date on that interaction? Do you know?

7 **THE WITNESS:** It was the 29th, November 29th.

8 **THE COURT:** 11/29. Okay.

9 **THE WITNESS:** I'm not sure about when it fit into the
10 timeline of the day off the top of my head.

11 **THE COURT:** Whether it was after the leave each other
12 alone letter or not?

13 **THE WITNESS:** Right.

14 **THE COURT:** We just don't know?

15 **THE WITNESS:** It would have been after I contacted
16 him to meet, but I don't know where it was in the time frame of
17 the letter.

18 **THE COURT:** Got it.

19 **BY MR. LEICHTY:**

20 **Q.** It came after Dr. Stackman's e-mail, right?

21 **A.** Yes.

22 **Q.** After you had reached out to him to meet?

23 **A.** Yes.

24 **Q.** But you're not certain as to whether it was before the
25 letter that you sent him after your meeting?

1 A. Right, I'm not sure about that.

2 Q. All right. Fair enough.

3 THE COURT: I was taking you to understand you
4 weren't even sure if that interaction occurred before you spoke
5 to him on that day.

6 THE WITNESS: I know it happened on the 29th. I'm
7 not sure off the top of my head where it was, sort of, in the
8 timing of that day.

9 THE COURT: Okay.

10 BY MR. LEICHTY:

11 Q. All right. Ms. Ryan, I'm showing you what's been marked
12 Exhibit 132. You see that here?

13 A. Yes.

14 Q. Could you tell the Court what Exhibit 132 is?

15 A. That's a flowchart of our administrative process related
16 to Title IX.

17 Q. This is much nicer than the one I tried to create. Is
18 this available online?

19 A. It is, yes.

20 Q. Is this something that you and Mr. Doe discussed at your
21 initial meeting?

22 A. I print this out and hand it to folks, complainants or
23 respondents, as we are talking. It is a lot easier to
24 understand than the red book.

25 Q. Do you go through this flowchart with Mr. Doe?

1 A. Yes.

2 Q. So he understands the process?

3 A. Yes.

4 MR. LEICHTY: Your Honor, at this time we move for
5 admission of 132.

6 THE COURT: Any objection?

7 MR. AGOSTINO: No, Your Honor.

8 THE COURT: 132 is admitted.

9 (Defendant's Exhibit No. 132, previously marked, was
10 admitted in evidence.)

11 BY MR. LEICHTY:

12 Q. Ms. Ryan, as I understand it, there are a variety of
13 witnesses that are interviewed as part of the administrative
14 investigation?

15 A. Yes.

16 Q. Do you recall how many?

17 A. Eight.

18 Q. Were those done by Ms. Lynn Kalamaros?

19 A. Yes.

20 Q. And were there other documents that were compiled from
21 either the -- either Mr. Doe and Ms. Roe?

22 A. Yes.

23 Q. And ultimately that becomes this administrative
24 investigation file, right?

25 A. Yes.

1 Q. Okay.

2 MR. LEICHTY: Your Honor, permission to approach the
3 witness?

4 THE COURT: Sure.

5 BY MR. LEICHTY:

6 Q. This is a voluminous exhibit we have marked Exhibit 123.

7 Ms. Ryan, can you tell the Court what this is, please?

8 A. This is the investigative summary report that was created
9 by Lynn Kalamaros related to the initial investigation between
10 Roe and Doe.

11 Q. And does it, in addition to the summary report, contain
12 the information that was gathered as part of the investigation?

13 A. Yes.

14 Q. Okay. Once this is compiled in this form as Exhibit 123,
15 what do you do with it, if anything?

16 A. I forward that to -- I actually -- I determine if the
17 behavior alleged could possibly be a policy violation related
18 to the policies that I oversee, and then I reach out to the
19 complainant to determine if they would like to move forward
20 with a conduct process or if it is her request that it not go
21 forward.

22 Q. Do you review the substance of what we find in
23 Exhibit 123?

24 A. I do.

25 Q. Okay. And are you making a final decision as to whether

1 or not the conduct as it's revealed in the investigation
2 actually is a violation of the policies in *du lac*, or are you
3 making some other, sort of, initial assessment?

4 **A.** I just make an assessment whether it could possibly be a
5 policy. I don't make any decision about responsibility.

6 **Q.** In this case what, sort of, initial assessment did you
7 make?

8 **A.** My initial assessment was the concerns that initiated the
9 administrative investigation were the dating violence concern
10 and, sort of, the behavior that was related to stalking, but I
11 may have called it more of a harassment piece at that time.

12 **Q.** And then after you have made that initial assessment, what
13 do you do next?

14 **A.** I contact the complainant to determine or learn what she
15 would like to do, and she informed me that she wanted to pursue
16 the University conduct process.

17 **Q.** And what happens after she's made that decision?

18 **A.** Then I contact both parties to let them know it has been
19 referred to the conduct process, and I inform Ryan Willerton at
20 the Office of Community Standards that it has been referred to
21 their process.

22 **Q.** Is this administrative investigation file then submitted
23 to OCS?

24 **A.** It is, yes.

25 **Q.** Once it is submitted on to OCS, do you have any further

1 involvement in this process?

2 **A.** No, we're in the gathering of information pieces.

3 **MR. LEICHTY:** Your Honor, at this time we would move
4 for admission of Exhibit 123.

5 **THE COURT:** Any objection?

6 **MR. AGOSTINO:** No, Your Honor.

7 **THE COURT:** All right. 123 is admitted.

8 (Defendant's Exhibit No. 123, previously marked, was
9 admitted in evidence.)

10 **BY MR. LEICHTY:**

11 **Q.** Now, as I understand it, at some point in time, there are
12 additional allegations that are made by both Ms. Roe and
13 Mr. Doe outside of what we see here in Exhibit 123, is that
14 right?

15 **A.** Yes.

16 **Q.** Okay. For lack of a better question, who starts this
17 second process?

18 **A.** Roe.

19 **Q.** Ms. Roe?

20 **A.** Yes.

21 **Q.** Okay. When does that commence?

22 **A.** Mid-February after this had been received and submitted to
23 community standards.

24 **Q.** Okay. And what's the -- without getting into the, sort
25 of, meat of the matter, generally speaking, what's the nature

1 of the allegation?

2 **A.** Retaliation.

3 **Q.** By Mr. Doe?

4 **A.** Yes.

5 **Q.** At some future point does Mr. Doe also make any
6 allegations against Ms. Roe?

7 **A.** Yes.

8 **THE COURT:** What's the nature of the retaliation?

9 **THE WITNESS:** That information that was in this
10 report that we just looked at was shared with witnesses.

11 **THE COURT:** Is he prohibited from doing that?

12 **THE WITNESS:** The (indiscernible) conduct process
13 letter talks about not sharing information with witnesses, so
14 we were just trying to learn more at that point. Because it
15 was related to an ongoing Title IX investigation, we explore
16 that through that process.

17 **THE COURT:** Okay.

18 **BY MR. LEICHTY:**

19 **Q.** When does Mr. Doe begin making allegations as against
20 Ms. Roe as best you recall?

21 **A.** I believe it was early March, but I'd have to look at the
22 e-mails. Maybe February.

23 **Q.** This morning we saw a couple videos involving Ms. Roe,
24 another woman, another female student, and there was a
25 gentleman who testified about his videotaping that. Are you

1 familiar with those two videos?

2 A. I am, yes.

3 Q. Did those two videos come into your possession at some
4 point?

5 A. Yes. Mr. Doe forwarded those to me.

6 Q. All right. Do you recall when he did that?

7 A. March 27th, I believe.

8 Q. And by the time we're at March 27th has the
9 administrative investigation been completed?

10 A. Yes.

11 Q. This is dated -- Exhibit 123 is dated February 5, 2017 --

12 A. I'm sorry. I meant the first administrative investigation
13 had been completed. We are on the second one at this point.
14 Yes.

15 Q. It could have been my bad question. I'm not talking about
16 the administrative investigation related to the second round of
17 allegations. But with respect to the first one, this
18 Exhibit 123 is dated February 5, 2017.

19 So these new videos come much later, right?

20 A. Yes.

21 Q. All right. When was the OCS hearing held, do you recall?

22 A. It was before spring break. It was -- I'm not going to
23 remember the exact date, but it was -- the decision was
24 actually before I received those videos.

25 Q. All right. So now we've also had -- the hearing was in

1 February of 2017?

2 **A.** Yes.

3 **Q.** Was the decision, you said, was also before you come into
4 possession of these videos on March 27th?

5 **A.** Yes, I believe it was March 20th the decisions might
6 have been communicated.

7 **Q.** So in terms of the process that Notre Dame follows given
8 that the administrative investigation, the hearing, and the
9 decision have all been finished, what does the University do
10 with this new information?

11 **A.** I actually conferred with Office of Community Standards to
12 determine what we wanted to do in terms of the next steps
13 because it could potentially just be referred to a conduct
14 process, but then ultimately determined after a little bit of
15 discussion between us and then also counsel that it should be
16 included in the current administrative investigation since it
17 is related to those allegations.

18 **Q.** Do you know whether it was included in any sort of review
19 process after OCS has made its decision?

20 **A.** I'm under the impression it was also included as a part of
21 a request for case review.

22 **Q.** Okay. And so we understand, once the hearing panel has
23 rendered its decision in reviewing these policy questions, what
24 is a case review?

25 **A.** The Office of Community Standards -- actually it is the

1 University of Conduct Process, the Office of Community
2 Standards doesn't administer it. But the University of Conduct
3 Process allows for a complainant or respondent, depending on
4 outcome, to request a case review based on a couple of
5 different grounds.

6 Q. Okay. I realize we are farther down the road than, sort
7 of, your bailiwick, so that's something to discuss with
8 Mr. Willerton?

9 A. Yes, that's not really my area as much.

10 Q. Okay. Aside from these two video clips that Mr. Doe
11 provides to you, does he make any other sort of complaints as
12 against Ms. Roe thereafter?

13 A. He on April 13th had submitted a couple of different
14 speak-up reports, which is our online reporting system. So
15 there were two related to no contact order violations and one
16 that was related to intimidation of witnesses.

17 Q. All right. And, again, obviously, those have come, again,
18 after the administrative investigation related to the first
19 case is concluded, right?

20 A. Yes.

21 Q. After the hearing, after the decision by OCS, right?

22 A. Yes.

23 Q. Okay. So in terms of process, what does the University
24 then do with, say, the allegation related to the intimidation
25 of these witnesses?

1 **A.** I contacted Doe about all three allegations on the 14th
2 to let him know that we had received that submission and that
3 we would review that information. On the 17th I contacted
4 both of the individuals that had been named as possibly
5 intimidated through the process, which is the following Monday
6 because we had a break for Good Friday and so left and then
7 took the weekend and contacted on Monday. Actually met with
8 one of those parties the following day on the 18th and then
9 followed up with the other party on the 19th because they
10 hadn't responded to me.

11 **Q.** Good Catholic university. We took Good Friday and Easter
12 off, right?

13 **A.** We did indeed.

14 **Q.** It is not as though you sat on these complaints without
15 investigating them shortly after he's made the allegation, is
16 that fair?

17 **A.** Yes.

18 **Q.** You may have said this or I didn't catch it but with
19 respect to one of the witnesses who was allegedly intimidated,
20 have you met with any one of them?

21 **A.** I have. I met with one of them on the 18th.

22 **Q.** Okay.

23 **A.** I had a follow-up e-mail to him on the 19th.

24 **Q.** So within days of Mr. Doe making the allegation?

25 **A.** Yes.

1 Q. Now, we looked together this morning with Mr. Agostino at
2 some e-mails where some accommodations were provided to Ms. Roe
3 to handle exams or classes. Do you recall those?

4 A. Yes.

5 Q. Do you recall at any time Mr. Doe requesting such an
6 accommodation?

7 A. I do not, not for faculty.

8 Q. Was there ever a time where Ms. Roe requested an
9 accommodation but was denied that?

10 A. Yes.

11 Q. Okay. And does that happen on occasion with respect to
12 both respondents and complainants?

13 A. Yes.

14 Q. Does it happen on occasion with respect to both men and
15 women?

16 A. Yes.

17 Q. You also looked at several e-mails with Mr. Agostino that
18 involved communications from Ms. Roe's mother?

19 A. Yes.

20 Q. All right. At any time did any of those e-mails change
21 the way you did your job?

22 A. No.

23 Q. Did they change the way in which you followed the
24 procedures adopted by Notre Dame?

25 A. No.

1 **THE COURT:** Did those e-mails work their way to the
2 OCS?

3 **THE WITNESS:** No, not that I'm aware of, but they
4 would be able to answer that.

5 **THE COURT:** Okay.

6 **BY MR. LEICHTY:**

7 **Q.** I know you talked earlier about this concept of giving
8 students agency. How does the purpose of giving the student
9 agency relate to these external communications coming from a
10 parent?

11 **A.** The communication from a parent doesn't guide whether or
12 not a process goes forward. A third party doesn't determine if
13 we move forward with conduct process investigations, what have
14 you. The students involved make those decisions.

15 **Q.** There was some discussion with *The Hunting Ground*. You
16 are familiar with that, right?

17 **A.** I am, yes.

18 **Q.** How does Notre Dame handle this film called *The Hunting*
19 *Ground*?

20 **A.** We actually host viewings on campus, and I participate in
21 panels to talk about the issues that are, sort of, portrayed in
22 that and talk about how as the University we work with students
23 to navigate those concerns.

24 **Q.** Notre Dame actually screens it?

25 **A.** We do. Several times a year.

1 **THE COURT:** That's some documentary? I'm not aware
2 of it. Can you tell me what it is?

3 **THE WITNESS:** Sure. It is a documentary from spring
4 of 2015, I think, that talks about campus culture and sexual
5 assault on college campuses. Several institutions are
6 highlighted. Notre Dame is one of them. One of the main
7 highlights is that there is a lot of student activism in one
8 campus and they, sort of, follow that and how that's continued,
9 but that's pretty standard for universities to air it at this
10 point.

11 **THE COURT:** Sure. Okay.

12 **BY MR. LEICHTY:**

13 **Q.** Of course the University has interactions with OCR, right?

14 **A.** Yes.

15 **Q.** Whether it is an e-mail from a parent, concerned parent,
16 whether it was an interaction with OCR, whether it is a
17 documentary like *The Hunting Ground*, how does that impact, if
18 at all, what your office does with respect to these Title IX
19 complaints?

20 **A.** We document things. That's really how it impacts it. I
21 think that we understand that there has to be integrity of the
22 process, and we take it very seriously. And so I wouldn't say
23 any of those external pressures impact process and decision
24 making within that.

25 **Q.** Does Notre Dame change the way it follows its procedures

1 in these types of matters whether the student is from a wealthy
2 family or on student aid?

3 **A.** No, not at all.

4 **Q.** What if the student is a student athlete as opposed to
5 not?

6 **A.** Not at all.

7 **Q.** What if it is a man or a woman?

8 **A.** Not at all.

9 **Q.** What if it is a freshman as compared to a near graduating
10 senior?

11 **A.** All of the processes are the same regardless of the
12 student status.

13 **MR. LEICHTY:** That's all the questions I have at this
14 point, Your Honor.

15 **THE COURT:** Can I just ask, is there more flex --
16 maybe this is better asked to Mr. Willerton, is that his name?
17 Is there more flexibility as to the remedy for somebody who is
18 a freshman, sophomore, junior as compared to somebody who is
19 about to graduate where it becomes kind of binary; you either
20 expel them or there's no discipline at all? Do you understand
21 what I'm getting at?

22 **THE WITNESS:** I understand the question. I think he
23 would be able to answer it better than I could.

24 **THE COURT:** All right. Thank you.

25 **MR. LEICHTY:** Thank you, Your Honor.

1 THE COURT: Do you have any redirect, Mr. Agostino?

2 MR. AGOSTINO: Yes, Your Honor. Probably the nature
3 of cross.

4 THE COURT: I suppose, yeah.

5 REDIRECT EXAMINATION

6 BY MR. AGOSTINO:

7 Q. So I wanted to talk to you about the red book.

8 A. Yes, sir.

9 Q. Okay. You told us that this kind of sets out the
10 procedures, and you went through it page by page with Mr. Doe,
11 correct?

12 A. Yes.

13 Q. All right. I find it kind of hard to believe that you
14 would have actually went through it detail by detail in 30
15 minutes. You didn't read this book line by line?

16 A. I provide summaries of the sections through that contact.

17 Q. For example, what would you say on page 10. How would you
18 summarize page 10?

19 A. I would talk about this given the allegations and share
20 that this is information about our consent policy and because
21 this wasn't one of the policies that was, sort of, initiated in
22 the conversation, I would say that we can refer back to this if
23 he has more questions about it.

24 Q. That would be the extent of what you would say?

25 A. For this policy, yes.

1 Q. Okay. Thank you. So you proceeded to do that then with
2 respect to all the other policies?

3 A. Yes.

4 Q. And when you got to the process -- and Mr. Leichty
5 discussed this with you -- but, for example, on page 28, item
6 eight on the opportunity to clarify information through the
7 administrative investigation, would it be fair to say that
8 eight describes what the right is?

9 You don't have a book in front of you.

10 **MR. AGOSTINO:** Do you have another copy?

11 **THE COURT:** Do you have an extra copy of this red
12 book so she can have one?

13 **THE WITNESS:** I thought I had one at one point.

14 **BY MR. AGOSTINO:**

15 Q. So on item eight on page 28, that's part of the -- you are
16 describing the procedure for the administrative hearing,
17 correct?

18 A. Perhaps I can clarify how I talk about the administrative
19 hearing process because I think there might have been a piece
20 of that.

21 Q. Excuse me for a second.

22 A. I'm sorry. I apologize.

23 Q. Could you answer my question?

24 A. Sure.

25 Q. Okay. So item eight, the first two lines there, item

1 eight, that describes a right or privilege for the respondent
2 at a hearing?

3 A. Uh-huh, yes.

4 Q. Okay. And then paragraphs A and B appear to limit that
5 right, is that correct?

6 A. It provides some parameters for how to participate in
7 that, yes.

8 Q. And that's kind of the same pattern as well with respect
9 to item seven. You give a right on the one side and then you
10 limit it?

11 A. We provide parameters for how to participate with that.

12 Q. You limit the right, is that what you mean when you say
13 the word "parameter"?

14 A. It is defining the role and how they participate.

15 Q. You restrict what the right is, don't you?

16 A. It is a nonspeaking role if that's the question.

17 Q. Yes. You tell them they can have an adviser, but the
18 adviser can't say anything during the hearing?

19 A. That's accurate.

20 Q. Okay. And you tell them that they can speak to the
21 adviser only during breaks, but all the breaks are
22 discretionary with the panel?

23 A. The community standards can talk about how breaks are
24 initiated because I don't participate in that part.

25 Q. Doesn't it say that they are conferred by -- or set by the

1 panel, or you don't know that?

2 **A.** It does say that. I'm saying they can talk more about why
3 or how they do that.

4 **Q.** Okay. And would you consider it appropriate for Mr. Doe
5 to be able to submit a report from his counselor at the
6 university supporting him and his behavior modifications and
7 his ability to function in the school to be something to be
8 considered by the administrative -- at the administrative
9 hearing?

10 **A.** I don't have any information about that, so the
11 administrative hearing would have gone through the Office of
12 Community Standards for that decision making.

13 **Q.** Would you find it odd or unusual or irregular for someone
14 at the University to tell a psychologist or counselor at the
15 University to not submit a letter supporting the respondent?

16 **A.** I'm not a part of that, so I don't have any context for
17 that.

18 **Q.** I mean, as a Title IX Deputy Coordinator, do you have an
19 opinion about that?

20 **A.** The questions that they're looking at as we're
21 investigating things is about behavior and specific behavior
22 that someone engaged in that could have been a policy
23 violation. If we are looking at witnesses, it is witnesses to
24 the incident typically, and so that's, sort of, the framework
25 for the investigation.

1 **THE COURT:** So they won't consider motivation, just
2 what they did, not why they did it?

3 **THE WITNESS:** There might be some information as a
4 part of that, but I don't typically receive those kinds of
5 letters through the investigation. They just aren't typically
6 submitted.

7 **BY MR. AGOSTINO:**

8 **Q.** Do you have any understanding as to how someone that has
9 major depression processes information or new information in a
10 learning process?

11 **A.** I'm not a clinician, I wouldn't.

12 **Q.** Do you suppose it might interfere with their ability to
13 absorb information or receive information?

14 **A.** I would have to have some information about that.

15 **Q.** Do you factor that -- you as the -- been involved in the
16 university setting for quite a few years, correct?

17 **A.** Yes.

18 **Q.** You've had to deal with students with disabilities, mental
19 disabilities, correct?

20 **A.** Yes.

21 **Q.** Okay. In the Title IX process, what specifically is there
22 to accommodate a student suffering from major depression to
23 make sure that they understand and receive information from you
24 in a proper way?

25 **A.** We provide information through our individual meetings,

1 written communication, through digital communication for any
2 student.

3 Q. But you don't know whether any are effective because you
4 are not a clinician?

5 A. I don't have any -- we don't have that conversation.

6 Q. You mention that you try to stay up to date. What have
7 you done as a Deputy Title IX Coordinator to make sure that the
8 way you handle things accommodates people with disabilities as
9 they go through the process?

10 A. We would work with our disability services if we had
11 received a report that someone needed an accommodation, and I
12 have not received that request. So I would work very closely
13 with our Sara Bea Center to do that.

14 Q. You are aware suicidal ideation goes hand in hand with
15 major depression, are you not?

16 A. Yes.

17 Q. You had that information as a representative of the
18 University of Notre Dame, correct?

19 A. Yes.

20 Q. What did you do to involve someone to help with
21 accommodating for that disability?

22 A. I didn't have any documentation that there was a
23 disability or had a request to look at that as a disability.

24 Q. You were made aware of that by the complainant, true?

25 A. I was made aware that someone had made statements about

1 killing themselves. I wasn't made aware of an actual diagnosis
2 or disability or request for accommodations.

3 Q. Does Notre Dame have a practice of ignoring people that
4 present a risk of suicide?

5 A. No.

6 Q. Okay.

7 A. We didn't.

8 Q. You didn't in this case make a referral to accommodate his
9 major depression?

10 A. (No response.)

11 Q. Does the red book define physical violence?

12 A. No.

13 Q. Does the red book distinguish between self-inflicted harm
14 and harm inflicted on others?

15 A. No. In relation to dating violence, for clarification, it
16 is specific for violence or threat of violence.

17 Q. You mentioned that you denied a request for accommodation
18 by Jane Roe?

19 A. Yes.

20 Q. And when you did that, did you get a response from her
21 mother criticizing you?

22 A. I'm not sure. I'd have to look through the e-mails.

23 Q. And the e-mails I showed you today from her mother in the
24 context -- if those were sent from one student to another,
25 would those constitute assault or abusive behavior?

1 A. I would have to think through it in that context. I
2 hadn't pursued it in that context.

3 Q. Okay. If there's a timeline that shows that John Doe saw
4 XXXXX on the way to the car at approximately 12:15, then met
5 with you at 2 p.m. and then received your no contact at 6 p.m.
6 on November 29th, would you have any reason to argue with
7 that?

8 A. That's plausible because I'm not sure about the timeline.
9 Sure.

10 Q. And just to be clear on the letter you sent to Jane Roe on
11 October 13th, offered her services?

12 A. I believe that was October 14th, but, yes.

13 Q. October 14th. You are right.

14 Six weeks later -- it took you six weeks later before you
15 offered any services to John Doe?

16 A. John Doe wasn't participating in the Title IX process at
17 that point, therefore I wasn't having that contact. And from
18 the communication today, it looks like Dr. Stackman was
19 communicating with him about that.

20 Q. But not in the context of the Title IX process?

21 A. Not that I'm aware of.

22 Q. And if you go through these e-mails comparing what Ann
23 Detlefsen did to what Annie Eaton did, would you be surprised
24 to find out that Annie Eaton assisted Jane at least five or six
25 times compared to one on the part of Annie Detlefsen?

1 A. I would have to look at them comparatively. I don't know
2 the numbers.

3 Q. Again, to be clear on the record, you don't know what
4 resources Dr. Stackman offered, if any?

5 A. I'm not sure during that meeting because I wasn't present.

6 Q. Calling your attention to Exhibit 21 -- 121, I'm sorry,
7 Defendant's Exhibit 121, and specifically under the column here
8 where it says, "November 29, Notice of Charges," do you see
9 that?

10 A. Yes.

11 Q. Okay. Is there a letter that spells out the charges?

12 A. No. The letter actually talks about -- talks more
13 generally about all of the policies that could be questioned
14 about that, so I think that was in one of the second or third
15 paragraphs.

16 Q. So the notice of charges doesn't say specifically, for
17 example, on June 1 you punched her, or anything like that?

18 A. No. During the conversation, we talk about the context
19 of, sort of, text messages and that I don't have specific dates
20 about that.

21 Q. And any notice that you sent to Mr. Doe doesn't tell him
22 what he did on what specific date?

23 A. No, it does not.

24 Q. Okay. So it is a notice of some type of generality, like,
25 you broke the policies at Notre Dame?

1 A. It is notice that we have received an allegation about
2 behavior and that we are trying to learn more about that
3 through the administrative investigation.

4 Q. Now, do you have -- from your meetings with any of the
5 people involved in this, do you keep notes?

6 A. I actually typically use my correspondence as, sort of,
7 the note keeping for that.

8 Q. Do you keep notes before you create the correspondence?

9 A. Typically, yeah.

10 Q. Okay. What happens with those notes?

11 A. They might be in a notebook. I would have to look -- I
12 keep notebooks periodically.

13 Q. Okay. With entries for names of who you talked to and
14 what is said?

15 A. Just some cursory information because I don't want someone
16 seeing the notes and seeing that.

17 Q. You keep a log on your computer?

18 A. We do keep a spreadsheet of information.

19 Q. Okay. And the spreadsheet of information is an Excel
20 spreadsheet?

21 A. Yes.

22 Q. And that would be able to identify what?

23 A. That would have information about, sort of, the number of
24 cases, the complainants, respondents, demographic information
25 about them, and very general information about, sort of, what

1 the policy questions were that initiated the investigation.

2 Q. And do you use that spreadsheet to generate any
3 statistical analysis?

4 A. Yes.

5 Q. So earlier when His Honor asked you about percentage of
6 cases, that comes off of that spreadsheet?

7 A. Typically annually. We don't do a lot of statistical
8 analysis throughout the year.

9 Q. I believe you said about 90 percent of the cases were
10 females complaining about males?

11 A. Anecdotally off the top of my head, yeah.

12 Q. One of the e-mails we talked about earlier that's this --
13 this particular one is in the record under seal -- but it is
14 Bates Stamp (A1#2) 199, part of Exhibit 47.

15 It is a February 3 e-mail from you to Mr. Doe -- I'm sorry
16 it is an e-mail from Mr. Doe to you about reporting the no
17 contact violation?

18 A. Yes, probably from January 31st.

19 Q. Okay. Did you send to Ms. Roe a letter similar to the
20 November 29th letter that you sent to Mr. Doe?

21 A. No. The practice when we have, sort of, other no contact
22 violations is that we communicate that via e-mail or in person
23 if there are spaces for that.

24 Q. So did you send her via e-mail a letter that's the same as
25 the November 29th letter?

1 A. No, it would be briefer because we already have an
2 understanding of process. We just sort of clarify there's an
3 allegation.

4 Q. So it is different?

5 A. Uh-huh.

6 Q. Is that, yes?

7 A. Yes.

8 MR. AGOSTINO: May I have a moment, Your Honor.

9 THE COURT: Sure, of course.

10 MR. AGOSTINO: No further questions.

11 THE COURT: Any further questions?

12 MR. LEICHTY: A couple follow up.

13 THE COURT: Very briefly.

14 **RECROSS-EXAMINATION**

15 **BY MR. LEICHTY:**

16 Q. Ms. Ryan, in terms of the policy questions that ultimately
17 become an issue at OCS, is there a reason that's not finally
18 determined until after the administrative investigation?

19 A. Because the Office of Community Standards that administers
20 the conduct process, and so that way they can use all of the
21 information to determine what would be an appropriate labeling
22 of policy questions.

23 Q. We are talking about this notice that happens in the
24 November 29, 2016 letter to Mr. Doe --

25 A. Yes.

1 Q. -- about what policy questions might be at issue and what
2 ultimately he's advised of are the policy questions at issue.
3 Is there a reason why we can't pinpoint precisely at this
4 earlier point all the policy questions that may be at issue or
5 the conduct that may under (indisernible) that?

6 A. With initial reports, we just don't know what we don't
7 know yet, and we want to make sure we are able to have a
8 thorough investigation that can provide more context for that.
9 And that's why the Office of Community Standards actually will
10 take that information and actually note policy questions
11 through that process so they can be notified of that as well.

12 Q. The University wants to conduct its investigation before
13 it makes the final decision on what policy questions will be at
14 issue in that matter, right?

15 A. Yes.

16 Q. With respect to this question about what Mr. Doe may or
17 may not have understood, during any of your interactions with
18 him, whether they are in person or as you observed
19 communications with him, are you aware of any instance in which
20 from your perspective he didn't understand what was going on in
21 terms of the process at Notre Dame?

22 A. No.

23 **MR. LEICHTY:** Thank you.

24 **THE COURT:** Okay. Ma'am, thank you. You may step
25 down.

1 Why don't we take a 10-minute break because we are running
2 out of time here, so 10 minutes. Five minutes after three we
3 will pick back up.

4 (A recess was had at 2:53 p.m.)

5 (The following proceedings were held in open court
6 beginning at 3:10 p.m., reported as follows:)

7 **DEPUTY CLERK:** All rise.

8 **THE COURT:** You can be seated. You ready to call
9 your next witness?

10 **MS. HAMILL:** Yes, Your Honor. We would call
11 Mr. Willerton.

12 **THE COURT:** Mr. Willerton. Come on up here, sir.
13 Raise your right hand, and we'll swear you.

14 **THE WITNESS:** Thank you.

15 (The oath was administered.)

16 **THE WITNESS:** Yes, ma'am.

17 **THE COURT:** You may be seated.

18 **THE WITNESS:** Thank you.

19 RYAN WILLERTON, PLAINTIFF WITNESS, SWORN

20 **DIRECT EXAMINATION**

21 **BY MS. HAMILL:**

22 **Q.** Good afternoon, Mr. Willerton.

23 **A.** Good afternoon.

24 **Q.** My name is Patricia Hamill, and I represent Mr. Doe.

25 Thank you for being here. If you could state your name for the

1 record and your current title at Notre Dame, that would be
2 great.

3 **A.** Ryan Willerton, Director of the Office of Community
4 Standards.

5 **Q.** How long have you headed that office?

6 **A.** For the last about five years, so fall 2012, August 2012.

7 **Q.** But you have been at the University for about 18 years
8 now?

9 **A.** Just about 19 this coming June, yes, 18 to 19 years.

10 **Q.** If you could, just give us a very brief overview of that
11 time at the University, different positions or offices you have
12 been in?

13 **A.** Absolutely. Started in student activities in 1998. Held
14 that position for three years as a student development
15 coordinator working with clubs --

16 **THE REPORTER:** You need to slow down.

17 **THE COURT:** You got to slow down.

18 **THE WITNESS:** I apologize.

19 **BY THE WITNESS:**

20 **A.** 1998 to 2001, Student Development Coordinator working with
21 clubs, organizations, leadership development; 2001 to 2003
22 Assistant Director of the Office of Resident Life and Housing
23 working with student discipline and conduct as well as summer
24 housing management of our facilities and assignments; 2003 to
25 2012 I started off as Assistant Director of Student Activities

1 for Facilities, and I was promoted to Associate Director and
2 then promoted again to Director. And within that area of
3 responsibility was advising student organizations, including
4 our fee allocation board as well as managing facilities on
5 campus, student center, outdoor grounds, events, major campus
6 events; and then August 2012 was Director of the Office of
7 Community Standards.

8 **Q.** And as the Director of the Office of Community Standards,
9 which we've also been calling OCS or OSC when we get mixed up,
10 but OCS, what is it you do as the head of that office?

11 **A.** Sure. I have a few different functions. One function is
12 to head the department and supervise our staff, so I currently
13 have two assistant directors and an administrative assistant.
14 We just hired a third assistant director who will start this
15 summer.

16 I also am responsible for publishing our student handbook,
17 which is known as *du lac*, A Guide to Student Life, which I
18 believe everybody has probably talked about today. In addition
19 to that, I work on educational initiatives with partners on
20 campus to educate new students and returning students about our
21 standards and expectations and how our University conduct
22 process works.

23 And then I also review incident reports; so as reports
24 come into our office, whether they be from resident's hall
25 staff, students, local police agencies, particularly Notre Dame

1 Security Police. It is reviewing those incident reports and
2 processing them in one of four different settings that we have;
3 so within our conduct process, we have four different settings.

4 Q. And with respect to what we're all here about today, which
5 setting would that fall in?

6 A. Yep, it is known as an administrative hearing.

7 Q. Now, you've just talked about *du lac*, so just for purposes
8 of -- for the record, I'm going to show you what's been marked
9 as Plaintiff's Exhibit 1. And can you identify that for the
10 record?

11 A. Sure. So this is known as our red book. The color of the
12 book changes each year so it is distinguishable and
13 identifiable, but what you have here is a hard copy version of
14 a portion of the student handbook. And this portion is also
15 available on a website on one long web page, so all of the
16 information in the booklet tracks what is online in an
17 electronic format.

18 And that is a small percentage of the overall student
19 handbook, so these procedures here are related just to how we
20 address incidents that are listed in the title.

21 Q. Such as the ones we are here about today?

22 A. That's correct.

23 Q. You would agree with me that the *du lac*, in the context of
24 these types of cases, allows for and promises a prompt, fair,
25 and impartial investigation and resolution. I'm just pointing

1 to the language there. Would you agree with me?

2 **A.** Yes.

3 **Q.** And that -- I want to show you what is marked as
4 Plaintiff's Exhibit 2.

5 This is a document I'm going to -- let's see what I can do
6 here to get it a little more -- this is a document that
7 Notre Dame's counsel put into the record on Tuesday when we
8 were here last before His Honor labeled Extensive Process Under
9 *du lac*. Have you ever seen that document before?

10 **A.** I believe I have seen a version of it, a draft format of
11 it.

12 **Q.** And that's a list of the different procedures that are
13 part of the process for handling sexual misconduct and sexual
14 harassment claims within the Notre Dame system, correct?

15 **A.** It is a general overview, uh-huh.

16 **Q.** Now, as far as it being a general overview, would you
17 agree with me that while this is a nice list and it certainly
18 looks extensive that it matters how each of the phases of the
19 process are conducted? It is not just a matter of checking off
20 the boxes, but it actually matters how you go about doing each
21 step of the process?

22 **A.** Yeah. So how we manage our process and the Code of
23 Conduct that we have in our student handbook, those are the
24 procedures we're required and expected to follow.

25 **Q.** And additionally that the -- each step needs to be fair

1 and impartial if Notre Dame's going to meet its obligation and
2 promise in *du lac* that there's going to be a fair and impartial
3 resolution of the matters that fall under the *du lac* province,
4 correct?

5 **A.** I guess for clarification, when we talk about each of the
6 steps, the steps that I work with are related to the conduct
7 process.

8 **Q.** Well, if you want to talk about it that way. I guess I'm
9 talking about it from administrative investigation, notice of
10 charges, all the way through to the case review board. If you
11 want to just talk about your part -- but it is, sort of, a
12 general question.

13 Would you agree with me for Notre Dame to provide a fair
14 and impartial resolution that each one of the steps along the
15 process from the first notice to the case review board analysis
16 needs to be fair and impartial?

17 **A.** Sure. Fair and impartial and I guess I would add, if I
18 may, that the student handbook is what guides the expectations
19 that we have for what is fair, equitable.

20 **Q.** So let me just explore that a little bit. I guess what
21 I'm trying to get at is the how you go about doing it, not just
22 that you do it, but that you do it in a fair manner. You agree
23 with me that's the goal and that's what you are trying to do,
24 correct?

25 **A.** Yeah.

1 Q. Is that a yes?

2 A. Yes. I'm sorry, yes.

3 Q. And if you offer something to one of the parties to a
4 disciplinary matter you need to offer it to the other party,
5 correct?

6 A. Yes. So we have an equitable process, that's correct.

7 Q. That's only fair, correct?

8 A. Yes.

9 Q. Now, I want to turn to the initial complaint and
10 investigation regarding Mr. Doe's situation. Now, that was
11 handled before it came to your office by -- under the auspices
12 of Heather Ryan, correct?

13 A. That's correct.

14 Q. And that's her responsibility as a Deputy Title IX
15 Coordinator?

16 A. That's correct.

17 Q. So getting back to Exhibit 2. The second item here says,
18 notice of charges to Mr. Doe, November 2016.

19 In your understanding -- now, when you get a file or a
20 matter turned over to you, the file has already been completed
21 through this administrative process, correct?

22 A. If I could provide context. So what I receive is an
23 investigator's summary as well as any attachments, the witness
24 statements. I receive the report from the Deputy Title IX
25 Coordinator.

1 Q. Okay. So for notice of charges, which, again, on
2 Exhibit 2, the second bullet point here, says notice -- can you
3 read that?

4 A. Yes.

5 Q. Okay. Says notice of charges and November of 2016. I
6 want to show you what's previously been marked as, this is
7 Notre Dame's Exhibit 118, dated November 29, 2016. Are you
8 familiar with that document?

9 A. Not in its entirety, but I recognize it as a standard
10 letter that would be issued from the Deputy Title IX
11 Coordinator.

12 Q. And if you draw your eye down to the third paragraph where
13 it says, "You can find the University's policies related to
14 sexual assault, sexual misconduct, dating and domestic
15 violence, stalking and/or conduct that creates a hostile
16 environment," would you agree with me that while that lists
17 certain policy provisions it doesn't really give a notice to
18 the person, Mr. Doe, who's receiving this, exactly in writing
19 what it is he's being charged with or investigated about, is
20 that correct?

21 A. If I may add a clarification. The, quote-unquote, the
22 notice of charges that we use in our process, is what's known
23 as the administrative hearing notification letter; so this is a
24 letter we send to students -- this would have been issued on
25 February 13th where it bullet points the Standards of Conduct

1 that we're asking a question --

2 Q. I'm asking --

3 **THE COURT:** Counsel is asking you when he's initially
4 told of the investigation, not when he's told at the hearing
5 phase. I think that's what you are getting at, right, Counsel?

6 **MS. HAMILL:** That's correct, Your Honor.

7 **BY MS. HAMILL:**

8 Q. I'm taking -- Mr. Willerton, I'm taking this through the
9 phases; and eventually I'm going to get to your bailiwick. But
10 right now I'm taking you through the initial phases.

11 So would you agree with me this November 29th letter
12 from Ms. Ryan to Mr. Doe, while it contains information, it is
13 very general with respect to possible violations that might be
14 at issue here?

15 A. Yes, I would agree it was general.

16 Q. And it doesn't contain any underlying facts that would
17 support any of the potential policy violations, correct?

18 A. Yes, I don't see any facts in this letter.

19 Q. Now, at some point in this process Ms. Ryan determines
20 that there's a potential violation and then she passes it -- or
21 at least has it then investigated and then it eventually gets
22 to your offices, correct?

23 A. That is correct.

24 Q. Now, in terms of the person who conducted the
25 administrative investigation here, Lynn Kalamaros, you are not

1 involved in selecting her, is that correct?

2 A. That is correct.

3 Q. Now, she generated a report on -- that's fine. She
4 generated a report on February 5th. I'm just gonna -- this
5 is Plaintiff's Exhibit 4 for the record.

6 Are you familiar with this document?

7 A. Yes.

8 Q. And this is the document that is prepared by the
9 administrative investigator after interviewing witnesses and
10 reviewing materials and whatnot, correct?

11 A. That's correct. That's how I understand that.

12 Q. Now, I look through this, but admittedly we've been given
13 a lot of documents in the last couple days, so I may not have
14 seen anything, but as I look at that I don't see any reference
15 to policy provisions or charges or anything like that. It is
16 just a summary of information, correct?

17 A. That's correct.

18 Q. How is it that Ms. Kalamaros, if you know, knows what it
19 is she's supposed to be looking for in terms of interviewing
20 witnesses if she's not citing to or looking at policy
21 provisions as she is doing those interviews?

22 A. To be honest, I really wouldn't have an answer.

23 Q. That's fine.

24 So with that, the report's generated, and then at that
25 point does the record get handed off to your office, not just

1 the report but materials that accompany it?

2 A. That's correct.

3 Q. And I'm assuming that in this record in particular it was
4 quite voluminous. Am I correct about that?

5 A. There were a number of pages. We have a lot of
6 investigations that have a number of pages in it. This was a
7 large investigation.

8 Q. And I'm not just talking about the report itself. I'm
9 talking about she's referencing various documents and whatnot.
10 So you're talking about in that context it was fairly
11 voluminous, correct?

12 A. That's correct.

13 Q. And she's not necessarily referencing in her report all of
14 the documents that have been submitted by the parties, correct?

15 A. That I would have to check her investigative summary to be
16 honest.

17 Q. Let me just get a visual from you. When the report and
18 the file gets to -- how does it get there? Does somebody pick
19 it up? Does it get sent in electronically? Is it divided into
20 parts where there may be documents that the investigator looked
21 at but doesn't really reference in her report once she
22 references -- just give me a visual sense, if you could.

23 A. Sure. So what we receive is a thumb drive of all of the
24 files that the investigator used or referenced; so if they were
25 the witness summaries, text messages, pictures, we would

1 receive a thumb drive of that. And then as of recent we
2 receive hard copies as well, so what we do is compile all that
3 information and print five copies of it, one for each member of
4 the hearing panel, so myself and two assistant directors, and
5 then we make two copies as well, one for the complainant and
6 one for the respondent in the case.

7 Q. And at the point where you are doing that, where you are
8 making copies of the record and whatnot, charges haven't been
9 communicated to the respondent at this point, have they?

10 A. They have not. Not at that point.

11 Q. Okay. And I know earlier Ms. Ryan called them policy
12 issues, but they're really charges, aren't they, in terms of --
13 the repercussions here for the types of things certainly that
14 Mr. Doe was faced with carried significant consequences if he
15 was found responsible, correct?

16 A. If I could just provide context. We've done a lot of work
17 to change the framework and the language that we use. Without
18 going into detail, we did a two-and-a-half year conduct process
19 study, and we have changed language from disciplinary charges,
20 summons into really what it is is an educational process. And
21 that's why we use policy questions instead of charges, a
22 notification letter instead of a summons trying to underscore
23 that this is an educational process. And, yes, the stakes are
24 very high for any student who may be dismissed from the
25 University, and we recognize that. But we also want to be true

1 to the process that this is an educational setting and it is an
2 educational process.

3 **THE COURT:** Educational for who?

4 **THE WITNESS:** Sure. For our campus community, for
5 the students who participate in the process. At the time that
6 a student receives an outcome that they don't agree with, it
7 hurts. It feels very punitive. Taking time away from the
8 University to get help, create a plan to be successful moving
9 forward, that's part of the educational and developmental and
10 formative process.

11 It is very common, without going on a tangent, and please
12 stop me at any time, with students who are dismissed and they
13 need to participate in substance abuse treatment or counseling,
14 they are very angry when they leave. Very common. Upset,
15 anger. You are ruining my life. You are changing my career
16 plans, and then they begin participating in a program and then
17 they participate in a group setting with other people facing
18 the same issues or an AA meeting. And over time, and it may
19 take two months, three months, there becomes a realization in
20 almost all of these cases of, I get it. I understand there's
21 an issue, and I'm glad that I'm getting this taken care of.
22 I'm not happy that I'm gone. This is not a joyous occasion in
23 any way, but it is also looking long-term.

24 So our hope is to help a student identify these issues,
25 create a plan to be successful, but also protect our community,

1 ensure that we have our expectations met for what we expect for
2 behavior.

3 **THE COURT:** Okay. Fair enough.

4 **BY MS. HAMILL:**

5 **Q.** How about a student that's already himself, because he
6 started on October 27th reaching out -- no, actually
7 October 13th, before the notice of charge came to him, who
8 started his own process in getting therapy, do you take that
9 into account in any way, by the time, four months, five months
10 later when the outcome is in effect? Do you take that into
11 account that he doesn't have to wait until he got dismissed
12 from the school, he started to take care of it while he was at
13 the school? Did you take that into account when you were
14 considering Mr. Doe's situation?

15 **A.** Yes, we did.

16 **Q.** Is that reflected anywhere in any of the decisions,
17 outcomes, or case reviews?

18 **A.** Yes, it is actually.

19 **Q.** And where would that be?

20 **A.** So Mr. Doe was not permanently dismissed from the
21 University, meaning he wasn't -- some people refer to as
22 expulsion. He has the ability to come back to school in a
23 relatively short period of time. Not every student is offered
24 that opportunity. There are some students who we say, you
25 don't understand the issue. You don't understand the severity

1 of this. We don't want you to come back.

2 For students who acknowledge their issues, they get the
3 help that they need, that doesn't wipe away conduct they have
4 engaged in, but it helps inform us, here is a student who has a
5 counseling relationship, who has admitted he's engaged in
6 behavior that maybe isn't the best, and he can come back next
7 January. And that's -- for our readmission process, that is
8 the shortest period of dismissal that we can offer, and that is
9 something that I shared with him at the decision meeting when
10 we communicated the outcome to him.

11 Q. And you are telling us that here today. I haven't
12 certainly seen it in any documents. We're not here to dispute
13 that, but it doesn't -- it is certainly not in the decision
14 letter, that 16-page single space decision letter that lays out
15 in detail all of the charges that have been brought against him
16 and the findings. You agree with me on that, wouldn't you?

17 A. Could you please repeat that.

18 Q. There's no reference in the decision letter, that goes
19 into -- a 16-page, which you have cited, a 16-page,
20 single-space letter that lays out what he's been alleged to
21 have done, what you found him responsible for. It merely deals
22 with the charges, the findings, and the sanction, correct?

23 A. The letter does provide a summary of the key pieces of
24 information, it provides a rationale, and it also provides what
25 the outcome is and that it was the shortest period of

1 dismissal. We don't say in the letter, this is the shortest
2 period of dismissal, that's correct.

3 Q. So let me get back to the process when this is coming to
4 your office, you have made your copies for the various members
5 of the panel, the parties themselves, and just to be clear with
6 this, when you say five copies, are we talking about -- we're
7 talking about Lynn Kalamaros's report, we're talking about
8 every document that each party has submitted, and any witness
9 summaries, correct?

10 A. Sure. All the documents that were forwarded to us, we
11 include in that.

12 Q. And in this case, would you say with -- between both
13 parties, what was the stack? Maybe a foot high? Eight inches?

14 A. Six -- or actually I'm trying to think here between our
15 final binder and the binder that we first received maybe
16 three inches, four inches.

17 Q. Right. So the first binder before the dump of documents
18 four days before the hearing was about three inches thick, and
19 then right before the hearing it grew to about six to
20 eight inches thick, correct?

21 A. I don't know the exact measurements, but it was more than
22 the original report, that's correct.

23 Q. With respect to determining the charges that went into the
24 letter that got sent to Mr. Doe on February 13th, how were
25 those charges determined? Who determined them? If you could

1 tell us that process, please.

2 **A.** Sure. So after we receive the report and the copies are
3 made, we identify one staff member on our team, so either
4 myself or one of our two assistant directors, to be the point
5 person. And that individual does a thorough review of all the
6 documents, and at that time they approach me as the Director
7 and typically it is in a group setting to say, these are the
8 policy questions that I have identified.

9 That's one of the reasons we call it a question is these
10 aren't foregone conclusions. They aren't assumptions they have
11 been violated. They provide a foundation for the conversation
12 at the administrative hearing to say, here are the policy
13 questions which appear to be applicable based on the
14 information we have. And then I sign off on that. Not
15 physically, but I agree. And I ask questions, and then I do a
16 review of the documents to ask questions to say, who should we
17 invite as a hearing panel as witnesses and what should the
18 policy questions be.

19 **Q.** I want to show you what's been marked previously as
20 Plaintiff's Exhibit 5. Can you see that okay? It is blurry
21 for me, but I can see the actual document.

22 **A.** Yeah.

23 **Q.** So this is the letter that we have been talking about in
24 terms of the notice of charge that then went out to Mr. Doe
25 following the review in your office with Amber Monroe as the

1 point person, correct?

2 A. That's correct. This is the administrative hearing
3 notification letter is what we call it, correct.

4 Q. And I note that the letter is signed by Amber Monroe,
5 correct?

6 A. That's correct.

7 Q. And she and you and one other person in your office were
8 then going to be the hearing panel members, correct?

9 A. That's correct.

10 Q. And Amber Monroe is the one who determined initially what
11 she thought the policy questions were but you had to sign off
12 on it before it got sent off to Mr. Doe?

13 A. That's correct.

14 Q. Isn't it true that Amber Monroe is a defendant in a
15 current Title IX lawsuit arising out of activities that she
16 engaged in when she was at the University of Indiana as a Title
17 IX Investigator? She has a pending lawsuit against her,
18 correct?

19 A. So I'm not sure of the details related to the lawsuit, but
20 she has shared with me that there's a pending lawsuit.

21 Q. And another lawsuit that she was also a defendant in was
22 just recently settled, isn't that correct?

23 A. I'm not aware of any statuses of any lawsuits that she
24 has. She doesn't talk to me about those cases.

25 Q. You are aware she's at least been a defendant in two

1 lawsuits arising out of her activities as a Title IX
2 Investigator at the University of Indiana, correct?

3 **A.** If I could qualify it by saying, I haven't seen any
4 reports, and she hasn't talked about the case to say, I'm a
5 defendant. I'm going to be called as a witness. She has just
6 shared with me that, I just want to let you know, Ryan, I have
7 a couple of things that I'm still taking care of with Indiana
8 University and they are legal matters. So I don't know the
9 substance.

10 **THE COURT:** That's the extent of your knowledge?

11 **THE WITNESS:** Yeah.

12 **THE COURT:** I'm going to ask you to move on.

13 **BY MS. HAMILL:**

14 **Q.** Again, with Exhibit 5, February 13 letter to Mr. Doe, it
15 lists the potential violations. There's no detail in terms of
16 the underlying facts that are connected to those in this
17 letter, correct?

18 **A.** That is correct.

19 **Q.** Do you sit on every hearing panel that comes through your
20 offices for these sexual misconduct, harassment matters?

21 **A.** Since I started in my role and up to today, yes.

22 **Q.** And does Ms. Monroe and Ms. Hunt, are they the other two
23 panelists always on these hearings?

24 **A.** Unless there's an extenuating circumstance, yes, since
25 they have been employed.

1 If I could please share a context for that as well, Judge
2 Simon. The three of us are the central office staff who manage
3 these cases, and we also manage other cases. We also have
4 approximately 20 trained conduct officers who work with
5 alcohol, drugs, vandalism, visitation, policy violations.
6 Those 20 individuals do not participate in any of these cases
7 with Title IX, VAWA related because we participate in annual
8 training. We are the most aware of the issues and the
9 procedures that need to be followed with this, and that's why
10 it is the three of us.

11 Q. Then just getting back to your testimony when you first
12 took the stand, so you are the supervisor of the two other
13 people who are on this hearing panel, correct?

14 A. That's correct.

15 Q. And have you ever considered whether that might be a
16 conflict of interest if there's a disagreement among panel
17 members or you feel one way and they feel another way?

18 A. If I may share, that has not come up to date, and I know
19 that it is hard to believe probably for some individuals. But
20 we have very robust conversations and don't agree on
21 everything, and everybody's voice carries equal weight.

22 Q. And how did the panel determine what witnesses they would
23 call, what questions would be allowed, and then what's the
24 record of that deliberation that you would have gone through?

25 A. Sure. So to start at the beginning, the who witnesses --

1 excuse me, which witnesses would be invited by the hearing
2 panel, that is part of the initial review that Amber would have
3 done with this -- or did with this, and then she consulted with
4 me. I concurred, asked her to put it in the letter, the
5 adhering notification letter.

6 We do not maintain records of our deliberations, so the
7 conversations that we have when we're determining whether or
8 not there's been a violation of our standards, there's no
9 recording, there's no notes. Those are conversations that we
10 have ongoing on a daily basis with our staff, and that's why we
11 have the -- what we refer to as the decision letter or the
12 March 20th letter in this case.

13 **Q.** Does your policy allow for dissenting opinions if you had
14 a two to one, or does it have to be unanimous?

15 **A.** We don't have a vote. We don't require a vote. Our Code
16 doesn't have a vote. I will share with you 100 percent
17 unequivocally every decision is agreed on by the panel, the
18 complete panel.

19 **Q.** So you can't have somebody who dissents like in -- two
20 people might say one thing and another person dissents and you
21 could put a decision out that reflected two different views but
22 at the end of the day a majority rules. You don't have that
23 capacity, is that correct?

24 **A.** So our decision letters don't have any provision to say
25 this panel member didn't agree with this part of the case or

1 they didn't agree with a finding of responsibility or an
2 outcome. It is a group decision as a panel, and that's why --

3 **THE COURT:** She asked a very narrow question. Can
4 there be a dissent, and the answer is no.

5 **THE WITNESS:** Okay.

6 **THE COURT:** Am I understanding that right?

7 **THE WITNESS:** That's correct.

8 **MS. HAMILL:** Thank you, Your Honor.

9 **BY MS. HAMILL:**

10 **Q.** With respect to reviewing documentation, and whether it is
11 three inches, six inches, but a fair amount of documents, you
12 agree with me, were already in the record and more were put in
13 four days before the hearing, correct?

14 **A.** Correct.

15 **Q.** And, in fact, the hearing was continued or extended or
16 paused, whatever word you want to use, in order to allow
17 Ms. Doe to put some additional documents into the record at her
18 request, correct?

19 **A.** When you say pause, we didn't reschedule an administrative
20 hearing. Our process provides for seven calendar days notice.
21 We identified a Friday to have the administrative hearing.

22 **Q.** Are you aware, and again, I don't want to belabor the
23 record here, and I can show you the documents, but are you
24 aware that Ms. Roe made a request that the hearing not go
25 forward on February 20th, there must have been a date that

1 was floating around, requested that it not go forward on the
2 20th so she would have time -- she thought she needed until
3 the 20th in order to get documents which were either phone
4 records, text messages, whatever it was, so that she could get
5 them into the record? Are you aware she made that request and
6 it was granted?

7 **A.** So the request I don't recall coming to our office. I do
8 recall Heather Ryan mentioning to me that the complainant in
9 the case was obtaining phone records and she should have them
10 by a particular date.

11 **Q.** And in order to allow her to do that, the process
12 accommodated her, correct?

13 **A.** We worked with a schedule to schedule the administrative
14 hearing in a timely manner.

15 **Q.** And at a time which would allow her to get these documents
16 in with enough -- the four-day notice in order to allow her to
17 get it into the record before the hearing, correct?

18 **A.** Yes.

19 **Q.** Okay. Now, with respect to both parties then they have --
20 two days before the hearing they are, basically, allowed to
21 look at these documents, right?

22 **A.** Correct.

23 **Q.** They are not allowed to take any photocopies of the
24 documents, right?

25 **A.** That's correct.

1 Q. So they have to come in either with notebooks, whatever
2 they are going to do, to take notes for the record that they
3 are going to have to work with for this administrative hearing,
4 they don't get to walk out with a copy of it, right?

5 A. That is correct.

6 Q. And this administrative hearing was scheduled at a time
7 when classes were in session, right?

8 A. Yes.

9 Q. So I'm looking -- just for purposes of the record, I'm
10 going to mark -- you did an affidavit in connection with this
11 matter, correct?

12 A. Yes.

13 Q. Okay. I'm going to show you what we've previously marked
14 as Plaintiff's Exhibit 7, and it is -- would you identify it
15 for the record, please?

16 A. Yes. This is an affidavit that has my name that I would
17 assume the following pages of the pages that I reviewed and
18 signed, yes. Yes.

19 Q. And signed on April 25th, correct?

20 A. (No response.)

21 Q. All right. I want to draw your attention to paragraph 11.
22 And can you see that? Is it clear enough for you?

23 A. Yes. Yes, I can see it.

24 Q. It always takes a while to focus in.

25 You have written in your affidavit, "With respect to

1 witnesses, it is the University's practice not to allow or
2 invite student's mental health counselors to actively
3 participate in administrative investigations though they are
4 able to participate as advisers in a nonspeaking role if
5 selected by the student." I have a couple of questions for you
6 about that.

7 You talk about it in terms of the administrative
8 investigation. Do you also mean the hearing process? Are you
9 talking about the whole from soup to nuts here?

10 **A.** Yes.

11 **Q.** Okay. And is there anyplace in any of the *du lac*
12 procedures or handbook where it would say that very point,
13 which is, you don't have mental health, therapists, counselors,
14 whatever, involved in this process?

15 **A.** That does not appear in the student handbook.

16 **Q.** Now, you've talked a little bit earlier today about taking
17 into account a student's -- making changes before they even get
18 that outcome letter where they realize, now I really got to do
19 something. And in Mr. Doe's case, he had started into therapy.
20 He was actively in therapy when he got the charges, and he
21 continued with that through this process. Did the panel in any
22 way consider whether they would want to hear from, assuming
23 Mr. Doe waived his right to have privacy here, to hear from
24 Mr. Doe's therapist about his progress, the motivation for his
25 conduct back in the fall? Did you consider that in any way?

1 A. We did not have any conversations as a hearing panel about
2 participation of counselors.

3 Q. There's nothing that would have prohibited you, however,
4 from having his counselor be, frankly, a witness for him in
5 that process, correct?

6 A. Actually, a counselor wouldn't be able to participate as a
7 witness. We have a very narrow stipulation for witnesses which
8 we refer to as a witnesses to the incident, so an individual
9 who had contact with either the complainant or the respondent
10 before, during, or after an incident.

11 So if there was somebody at a party before an incident
12 happened, that person can provide context to the individual's
13 behavior beforehand or during an incident happening or if they
14 made a phone call immediately afterwards and said something
15 just happened to me. That person can provide context, not a
16 firsthand account, but context to a phone call was made if
17 somebody was concerned. Not in this case, but in general.

18 Q. And to me, just throwing this out there, it would seem
19 like there might be context that could be provided by a
20 therapist about if somebody is suffering from a mental illness,
21 and in this case Mr. Doe was depressed during the period when
22 he was going through the conduct he's alleged to have engaged
23 in. You were aware, I think, at least it came out at the
24 hearing that he was depressed, that he had a younger brother, a
25 14-year-old brother who had been hospitalized. Obvious serious

1 conditions, and that might have also motivated some of his
2 behavior back in the fall.

3 Are you telling me that you couldn't -- you wouldn't allow
4 a therapist into that process to give some context about
5 motivation, conduct -- or motivation for conduct?

6 **A.** So under our current process that we're obligated to
7 follow, no, a counselor would not be able to participate in
8 that way.

9 **Q.** Let me ask you, with the hearing process, Mr. Lahey,
10 counsel for the University, was present. Under what
11 circumstances -- I'm assuming he doesn't show up for all of the
12 hearings, so why was he present for this one?

13 **A.** That is correct that a representative from general counsel
14 does not attend many of our administrative hearings. Whenever
15 we have a complainant and a respondent who both have counsel, I
16 would typically reach out to -- Matt Lahey is our contact and
17 general counsel -- to say, could you please be available to
18 observe. And this is a provision that we have in our student
19 handbook that allows for a nonparticipating observer from the
20 Office of General Counsel. And to answer your question
21 directly, the purpose of that is in case an attorney as an
22 adviser would have questions.

23 So sometimes attorneys don't feel comfortable talking
24 about our process, and they feel very comfortable talking to
25 another attorney.

1 Not to go off on a tangent. I'll keep this brief. When
2 attorneys call our office, we refer them down to general
3 counsel so they can talk, and that is why he would be here.

4 **Q.** Did it have anything to do with the fact Jane Roe's mother
5 was complaining a lot to the school that they weren't doing
6 what they should have been doing?

7 **A.** Absolutely not.

8 **Q.** Let me get back to the therapist question. What if -- you
9 have talked about, sort of, observations before something
10 happened or during or after, that's what you are looking for.

11 In this situation, if you had Mr. Doe and Ms. Roe went to
12 therapy together when he started to reach out for help in
13 October of 2016, they went together to see a therapist, would
14 that in any way change, given that this is a relationship case,
15 the issues that arose here were in the context of a
16 relationship, would that change your answer in any way as to
17 whether a therapist would be possibly relevant to the inquiries
18 that the panel was facing?

19 **MR. LEICHTY:** Your Honor, objection on assumes facts
20 not in evidence and calls for speculation.

21 **THE COURT:** To the extent you can answer it, answer
22 it. If you can't, you can say so. Overruled.

23 **BY THE WITNESS:**

24 **A.** Sure. So the procedures -- I apologize for keeping
25 referring to the procedures, but the procedures that we have to

1 follow. And when we talk about an incident, it is an alleged
2 violation of policy. So it's an incident of a threat, an
3 incident of vandalism, an incident of abusive conduct, so just
4 a meeting where both of them are together isn't an incident.

5 **BY MS. HAMILL:**

6 **Q.** Let me ask you: So would you agree with me, regardless of
7 whether you want a therapist there or not, that relationship
8 cases where somebody has had a long-term relationship that's
9 the subject matter or at least arising -- the violations arise
10 out of that relationship, they are more complicated than your
11 average drunken hookup, correct?

12 **A.** That is correct.

13 **Q.** And in the context of making decisions about what might or
14 might not have happened in a relationship, don't you think
15 context is important, the context of the relationship, the
16 relationship between the two parties?

17 **A.** Context is helpful when understanding behaviors that
18 students engage in.

19 **Q.** And particularly when they are in a relationship together,
20 correct?

21 **A.** Yes, correct.

22 **Q.** And also when you've got mental illness issues context is
23 key, is it not?

24 **A.** I guess my answer to that would be we don't evaluate
25 mental health. We don't adjudicate mental health or mental

1 illnesses. A student can have suicidal ideation, and that's
2 not a violation of our Standards of Conduct.

3 Q. If it causes them to act in a particular way, then it
4 might be a policy violation, correct?

5 A. What we focus on are the behaviors. So if somebody
6 behaved in a certain way and did something, that's a violation.
7 That's -- our focus -- I apologize. Our focus is to determine
8 did a behavior more likely than not occur and more likely than
9 not does that constitute a violation of our standards; that's
10 our responsibility. And to process the information context,
11 yes, is helpful.

12 Q. And you are just looking at the behavior, and you don't
13 care why it happened, basically, is that correct?

14 A. I don't know if I would say that I don't care why it
15 happened, but we have to determine, was there behavior, and
16 does that constitute a violation.

17 Q. With respect to the hearing process, you've indicated that
18 both parties here had counsel, correct?

19 A. They both had advisers of their choice who happened to be
20 attorneys, that is correct.

21 Q. They both had to be silent through the process, correct?

22 A. That is correct, except for the breaks.

23 Q. And Ms. Roe was -- her adviser was a woman by the name of
24 Carly Mee, is that correct?

25 A. Yes.

1 Q. And she's with a law firm/organization called Serve
2 Justice, is that correct?

3 A. I recall seeing the phrase Serve Justice. I'm not
4 familiar with them, but I assume it is some type of
5 organization.

6 Q. So you are not familiar that their practice is focused on
7 supporting either complainants in these Title IX proceedings or
8 alleged victims of sexual assault? You are not aware of that?

9 A. I could make an assumption that it is. Typically with
10 complainants in a case, if they have an adviser, they might be
11 an advocate. Certainly I would not be surprised by that.

12 Q. Now, with respect to -- we have a very rough transcript of
13 a little -- some of the audio of the hearing, and I just want
14 to ask you a couple of questions.

15 It kind of echos a few things you said earlier. But first
16 of all -- let me just -- the context here is Ms. Monroe is the
17 one who is making the introductory statements. Do you recall
18 that to be the case?

19 A. That is correct.

20 Q. So as part of her introduction, she instructs the parties
21 here, "Please keep in mind that this is an educational process
22 and not a debate." So, again, she's echoing what you said
23 earlier that this is an educational process, correct?

24 A. That's correct.

25 I'd also share, Judge Simon, that is a common phrase that

1 we use, particularly when students want to talk over each
2 other. And that's why we share that on the front end of the
3 administrative hearing so they are prepared.

4 Q. So would you call it an educational process to dismiss
5 someone from the University when they have engaged in conduct
6 because of a mental illness?

7 A. Not because of a mental illness; but if they have engaged
8 in conduct that violates our standards, some conduct does
9 result in dismissal from the University. Yes, I agree with
10 that, partially.

11 Q. And then just the other comment that Ms. Monroe makes is
12 that while they have advisers, advisers will be permitted --
13 will not be permitted to make comments, pass notes, or
14 otherwise disrupt the administrative hearing. The term
15 "otherwise disrupt" may include whispering, sighing, staring,
16 or other actions which may disrupt the administrative hearing.
17 That's the instruction she gave, right?

18 A. That's correct. Those are the same instructions I give
19 when I am the lead, if you will.

20 I'm sorry, I didn't mean to interrupt. If I could
21 mention, Judge Simon, those have all happened in the past; and
22 once again, that is why we say that at the beginning.

23 **THE COURT:** Can I interject here and ask a question?

24 **MS. HAMILL:** Sure.

25 **THE COURT:** So I'm flemished by this. I don't have

1 any experience in this. This is your bailiwick, not mine. But
2 you have someone who is -- you say it is a policy question.
3 I'm going to call it a charge. They are charged with something
4 very serious and there's a real consequence to them being found
5 to have engaged in the behavior. They're going to -- I'm going
6 to presume they are going to lose 30 grand in tuition money for
7 a semester or thereabout, they are going to lose the time that
8 they put in up to that point in the semester, there's a chance
9 they could be expelled from the University, there's a chance
10 that their career could be delayed for a year or longer, or
11 thrown out of the University altogether. So I view those as
12 very, very serious consequences, as it should be.

13 **THE WITNESS:** Yes.

14 **THE COURT:** But with that being the case, why is it
15 that somebody isn't allowed to have a lawyer present to
16 represent them to protect their interest?

17 **THE WITNESS:** Sure.

18 **THE COURT:** Can you explain that to me?

19 **THE WITNESS:** Yeah. I don't want to beat a dead
20 horse. I respect we may disagree, but this is also an
21 educational setting where a student speaks for themselves and
22 articulates for themselves. This is a very hot topic in higher
23 education now where some states require the ability to have
24 somebody be represented, and through the conversations I have
25 had with colleagues there, these are no longer conduct

1 hearings. They're pseudo legal proceedings where a student
2 doesn't say a word. They sit there, stare straight ahead at
3 their representative, whoever that might be, a parent, friend,
4 attorney, basically is arguing a case. So this is no longer an
5 educational process where we're asking questions about behavior
6 they engaged in.

7 **THE COURT:** I don't want to -- why is it an
8 educational process? Why are you characterizing it that way
9 when, in fact, it is a punitive process if the person is found
10 to have violated a code of ethics or what have you? Why isn't
11 it actually a punitive process such that there's procedural
12 rights that are implicated by that.

13 **THE WITNESS:** Sure.

14 **THE COURT:** That's what I'm not understanding.

15 **THE WITNESS:** I respect your question on that and
16 your perspective on it as well. We have some of the most
17 robust procedures of any university out there. We don't have
18 an investigator model -- I'm not sure if that has come up
19 yet -- where one person makes a decision, renders a decision,
20 and whatever it might be.

21 At the end of the day, this is a university, and we have
22 rules. And if a student has violated these rules, and if they
23 are egregious enough, and we are talking about -- I don't want
24 to give an inaccurate number -- less than half a percent, a
25 handful of students who are dismissed annually. This is a

1 small, small percentage. We're trying to create an educational
2 environment that mirrors what we hope for.

3 We are creating communities that respect the human dignity
4 of each other and how we get along and how we can graduate this
5 individual. At the end of the day, they are a representative
6 of this University. I completely understand and I would
7 respect why somebody would want to have representation. I
8 don't disagree with that position at all.

9 **THE COURT:** Okay. Fair enough. Go ahead.

10 **BY MS. HAMILL:**

11 **Q.** So just continuing on. I'm still on the preamble that
12 Ms. Monroe gave at the beginning of the hearing. So she also
13 states, "Any questions asked will be at the sole discretion of
14 the hearing panel, and any questions must be related to the
15 incidents or policy question if applicable. Neither the
16 complainant nor the respondent will be permitted to engage in
17 any direct communication with each other before, during, or
18 immediately after the administrative hearing."

19 I meant to actually stop with, So all of the questions
20 must relate -- be related to the incidents or policy question
21 if applicable, correct?

22 **A.** That's what we try to create with the framework of the
23 administrative hearing so we can stay on task, correct.

24 **Q.** So, again, whether I agree with it or not, just to be
25 clear, you were limiting the parties and particularly Mr. Doe's

1 ability to bring in some of the context in the relationship
2 that he had with Ms. Roe unless it related directly to the
3 incidents that you all had defined as the policy questions,
4 correct?

5 **A.** The respondent, Mr. Doe, and complainant they were both
6 able and provided plenty of opportunities to clarify any
7 information they wished to clarify. These procedures refer to
8 questions, so rather than have a student ask another student a
9 question or provide a victim-blaming phrased question, that's
10 why the questions come to us. And it is very common where we
11 receive a list of five, ten questions and we may ask one or
12 two, and then we would say, Are there any other questions? And
13 it is common for a student to say, can you please ask number
14 four. You didn't ask number five, can you please consider
15 that.

16 **Q.** That really wasn't my question.

17 **A.** I'm sorry. I didn't mean to get off topic.

18 **Q.** What I was getting at was it is at your sole discretion,
19 which you have established?

20 **A.** That is correct.

21 **Q.** But also the questions had to be limited to the incidents
22 or policy question if applicable, correct?

23 **A.** That is correct.

24 **Q.** You weren't looking for the context of the relationship,
25 correct?

1 A. With questions to each other, correct.

2 Q. So you could ask questions about the relationship but they
3 couldn't ask it of each other through you?

4 A. (No response.)

5 Q. I don't understand your distinction.

6 A. So I guess the distinction is we typically don't ask for
7 questions about context of a relationship. A student is able
8 to provide that context; so if a respondent or complainant
9 says, can I please clarify some context about these text
10 messages, can I provide context about how our relationship
11 worked, yes. But to question back and forth, no.

12 Q. And that wasn't -- I think there's two separate things in
13 what I was quoting. One has to do with they can't directly
14 question each other, which is a well-accepted practice in these
15 proceedings. But the other is the limit on the questions was
16 to the incident in question or a policy question if applicable,
17 correct?

18 A. Yes.

19 Q. Okay. And then Mr. Doe and Ms. Roe were told they would
20 have an opportunity to hear and respond to all information
21 presented in the administrative hearing. Do you see that?

22 A. Yes.

23 Q. And then, again, just reiterating, Any questions asked to
24 the witnesses will be at the sole discretion of the hearing
25 panel, and they must related to the incident where a policy

1 question is applicable. Do you agree those were the
2 instructions that were given?

3 **A.** I believe they were. I would have no reason to not
4 believe those were the instructions. They seem very
5 consistent.

6 **Q.** That, in fact, is how the hearing was conducted, correct?

7 **A.** Could you please repeat?

8 **Q.** That, in fact, was how the hearing was conducted? The
9 preamble, the things I have just highlighted, that's how the
10 hearing was conducted, correct?

11 **A.** To the best of my recollection, yes, those are the
12 guidelines that we have to manage the process.

13 **Q.** Now, wasn't Ms. Roe allowed to bring up new allegations in
14 the hearing? Didn't she talk about that Mr. Doe had used his
15 suicidal threats to extract sex from her in not -- I'm trying
16 to think -- strike that for a minute.

17 Did Ms. Roe -- was she allowed to bring into the hearing
18 for the first time, you are not going to see it in the
19 administrative investigative summary, that Mr. Doe used his
20 suicidal threats to get her to have sex with him?

21 **A.** I don't recall her bringing up any information about
22 having sex with him.

23 **Q.** Do you recall it then being -- using his threats to get
24 her to be affectionate with him?

25 **A.** I recall that being discussed at the hearing.

1 Q. And affectionate with him both in private and in public in
2 groups of friends, do you recall that?

3 A. I don't recall that specificity.

4 Q. Would you agree with me that that was a new allegation,
5 that she had never made that? It is not in the investigative
6 summary, it is not in the report. Would you agree that's a new
7 allegation that she made at the hearing?

8 A. I wouldn't reference it as an allegation. I would
9 reference it as something she did bring up. The hearing panel,
10 to my best recollection, didn't say, Do you have any other
11 reports that you would like to bring up, do you have any other
12 policy questions that you would like to address? I don't
13 recall that ever happening.

14 Q. But she got to talk about the fact that John had
15 threatened suicide to basically get -- extract affection from
16 her, correct?

17 A. I remember her making a statement similar to that, and I
18 believe, if it is in the transcript, that he was also provided
19 the opportunity to respond to that; and I'm almost positive he
20 did.

21 Q. And I'm sure he denied it, right?

22 A. I believe so.

23 Q. My question goes a little bit in a different direction,
24 which is, she was allowed to bring that up for the first time
25 at the hearing though, right?

1 A. So students are allowed to clarify information, so it is
2 possible that a student could share that type of information,
3 yes.

4 Q. And that's something that she could have brought up in the
5 course of the months of investigation that went on, that that
6 was part of what she was complaining about, right, and she
7 didn't do that?

8 A. Yes.

9 Q. So after the hearing, didn't Mr. Doe ask to be allowed to
10 supplement the record in response to not just that but some
11 other new allegations that Jane Roe had offered at the hearing?

12 A. If I understand correct, so after the administrative
13 hearing, did he request to add new allegations against her?

14 Q. No, he requested to supplement the record so he could
15 respond to the new allegations that for the first time had been
16 made at the hearing?

17 A. I don't recall it off the top of my head. It's certainly
18 possible. I do recall during the administrative hearing as
19 well where -- it should be in the transcript -- where we would
20 have said, Today is the day to clarify information. That's the
21 venue where we clarify information.

22 Q. Meaning at the hearing that's the day, right?

23 A. That is correct.

24 Q. So if something new comes up or an allegation that's out
25 of left field, a student doesn't have an opportunity, other

1 than to say that's not true, but doesn't have an opportunity to
2 supplement the record in any way to negate what another student
3 has said in the context of a hearing that's a new allegation?

4 **A.** I guess the way that I would qualify that is, the only
5 policies that a student can violate in an administrative
6 hearing are the policies that we outlined in the original
7 administrative hearing notification letter. So if a student
8 says, and I was coerced into having sex with him and that would
9 be sexual assault. I can't find a student responsible for
10 sexual assault. We can certainly work with the Deputy Title IX
11 Coordinator to launch -- or excuse me, start a new
12 investigation. But I can't stop what a student is sharing at
13 the administrative hearing. I can certainly interrupt them,
14 but part of this, through the educational process, is for a
15 student to be able to clarify information in the report and
16 allow the other student to respond.

17 I think the transcript would show that when one student
18 spoke, very frequently we would say, Is there anything you
19 would like to respond, to whether it was the complainant or the
20 respondent.

21 **Q.** Right. And my point -- I realize you are not going to
22 charge Mr. Doe with a new violation in the middle of a hearing.
23 The point though is, are you telling me that when someone like
24 Ms. Roe starts bringing up, oh, he extracted sex from me or
25 extracted affection from me, a new statement, a new allegation,

1 that doesn't in any way color the panel's evaluation of the
2 four charges that were before the panel on that day?

3 **A.** I'll be very honest and say no.

4 **Q.** I'm going to show you what's been marked as Exhibit 8,
5 which is a March 9th e-mail string. And this is --

6 **THE COURT:** You need to turn it.

7 **MS. HAMILL:** I know. I'm trying to figure out --
8 okay.

9 **BY MS. HAMILL:**

10 **Q.** I'm just going to set this for the record, and then we can
11 look at it a little more closely. It starts with an e-mail
12 from Mr. Doe on March 8th to you asking if he can supplement
13 the record because the -- at the hearing some new allegations
14 came up and he wants to address those and he also wanted to
15 address the fact that he had moved for a motion to compel in
16 the St. Joseph County civil protective action to get the full
17 text messages that were exchanged between John and Jane.

18 Are you familiar with that document?

19 **A.** I don't recall it off the top of my head. If I could have
20 just a second to read through it, that would be helpful.

21 **Q.** Sure. Do you want me to hand you a copy?

22 **A.** No, this is fine.

23 **Q.** Tell me when you want me to turn.

24 **A.** Sure. I'll be very honest and say I don't recall
25 specifically sending this e-mail but that looks like something

1 I would send, that's language I used in the past. That's
2 language I would use today.

3 Q. So in response to Mr. Doe's request, and I'll just flip
4 the page to -- he is basically asking you to delay an OCS
5 decision for two reasons. First, the Court in the underlying
6 civil protective action has -- he hopes to get through a motion
7 to compel the text messages between him and Jane Roe, and he
8 also wants to respond to new allegations that were made against
9 him at the hearing. Do you see that, the two sections?

10 A. Yes.

11 Q. Okay. And you denied him that request, correct?

12 A. I followed our procedures, correct.

13 Q. And that was a denial of his request?

14 A. I informed him that the administrative hearing has been
15 completed and we would reach a decision and notify him, and
16 that's why we also have a case review process afterwards.

17 Q. And the three of you that are in the -- there's nothing
18 that would have prevented you, however. The three of you are
19 in the same office. If somebody submitted some additional
20 materials after a hearing, you would be able to gather together
21 to review them, correct?

22 A. We wouldn't review them.

23 Q. 'Cause it is not your policy. I'm just saying there's
24 nothing -- it is not your policy, right?

25 A. That's correct.

1 Q. But there's nothing to prevent you from -- given -- it is
2 not disparate. Some schools have faculty members -- it is hard
3 to get everybody together. You are all in the same office,
4 right?

5 A. That is correct. Correct that we are in the same office,
6 not correct we would review the documents.

7 Q. It is against your policy to allow anyone to supplement
8 the record after a hearing even if they believe new allegations
9 have come up or they think there are relevant documents they
10 will be getting that would add something to your deliberations,
11 correct?

12 A. That is why we have the case review process.

13 Q. Okay. And Ms. Roe was given time to gather the documents
14 that she thought she needed for the hearing, and there was a
15 pause, as Heather Ryan calls it, to allow her to do that. But
16 after the hearing the same was not granted to Mr. Doe, correct?

17 A. So the two different time periods. I'm not sure if she
18 called it a pause, but Mr. Doe was not allowed to submit
19 additional documents after the administrative hearing for
20 consideration for that original decision, that is correct.

21 Q. And he made that request on March 8th and then the
22 decision wasn't issued until March 20th, is that correct?

23 A. Yes, that's correct.

24 Q. I'm going to mark for -- it already has been marked
25 Plaintiff's Exhibit 9, which is the March 20, 2017, I guess,

1 what do you call that, decision letter?

2 A. Yeah, a decision letter, correct.

3 Q. And I believe you -- let me see if you are the author.

4 A. Yes, I am.

5 Q. That's what I thought.

6 A. I am.

7 Q. Do you author every decision that comes out of the Office
8 of --

9 A. No.

10 Q. -- Community Standards?

11 A. No.

12 Q. In this instance -- let me just ask you: How was this
13 decision letter put together? Did you draft it, did somebody
14 else draft it and you look at it, how is it done?

15 A. Sure. So we have different staff who, basically, are
16 researching the case file, listening to an audio recording on
17 headphones and transcribing and typing. So we parse out the
18 work, if you will, particularly with such a complex case. So
19 one person will be working on the audio recording, another
20 person may be transcribing some of the text messages so they
21 can be included in the letter. I would be working on the
22 rationale statement of more likely than not has there been a
23 violation. So there's multiple people working on the letter.

24 And then if I may provide clarification, I sign all of the
25 administrative hearing notification letters, so four different

1 settings. All of these I sign.

2 Q. Okay. So that's -- I guess that's what I was driving at.
3 In this context, in this setting, you are the one who's going
4 to sign the letter that comes out of the office?

5 A. That's correct.

6 Q. Do the audiotapes get transcribed?

7 A. No.

8 Q. So somebody is listening to them. When you are talking
9 about transcribing, you are talking about taking some -- maybe
10 what's in documents and putting them in a Word document so you
11 can use it as part of your decision letter?

12 A. That's correct. So an MP3 file of the administrative
13 hearing, headphones on or speakers on listening to it slowly,
14 rewind, slowly, rewind, and manually typing.

15 Q. And then in terms of deliberation after -- the letter
16 didn't come out for -- let's see, the hearing was on
17 February 24th.

18 A. Uh-huh.

19 Q. Letter comes out on March 20th.

20 In terms of the deliberation where you decide, what are we
21 going to decide here, what's going to be the finding, in this
22 instance, when did you do that?

23 A. So the deliberations were ongoing. I'll share for context
24 where we don't reach a decision right after an administrative
25 hearing. Some schools they have, for lack of a better term, an

1 anteroom they walk right out and say, based on what we just
2 heard, responsible or not responsible.

3 With us, we take a day off at a minimum to decompress, not
4 make any emotional, rash decisions; and then we go through the
5 notes we took at the administrative hearing, the investigative
6 report, listen to the audio recording to verify is this what we
7 heard at the administrative hearing, and we would have ongoing
8 conversations.

9 So we are managing a number of these cases at one time;
10 and as our schedule permits, we may meet one day for a half
11 hour, another day for 15 minutes, another day for two hours.
12 But we don't sit down for half a day or a day and say, let's
13 reach a decision, and let's start typing the letter right now.
14 So it is an ongoing deliberation, and it is an ongoing re-visit
15 and an ongoing can we go back and listen to the audio recording
16 to make ensure that we have the right information.

17 **Q.** Is this in every case you do that?

18 **A.** I can't say unequivocally every case but many of the
19 complex cases.

20 **Q.** This was a complex case, right?

21 **A.** Yes, it was.

22 **Q.** The notes that you took during the hearing, where are
23 those today?

24 **A.** The notes that I have? Probably in my office.

25 **Q.** Do you take a straw vote or anything like that? You may

1 not do the full letter. Do you take a straw vote?

2 **A.** No. So what we end up doing --

3 **Q.** I'm just asking --

4 **THE COURT:** Just answer the question.

5 **THE WITNESS:** Sorry.

6 **THE COURT:** Do you take a straw vote?

7 **THE WITNESS:** No.

8 **BY MS. HAMILL:**

9 **Q.** Your counsel will allow you to get wound up and give
10 your -- whatever you want to say, but let me just -- I'm trying
11 to be quick here and not succeeding by the way.

12 In terms of the -- actually deciding. Forget about all
13 the language in the letter and it getting all typed up, when
14 did you decide in the process that Mr. Doe was going to be
15 found responsible for these four charges?

16 **A.** I don't remember a specific date.

17 **Q.** Do you have notes of a meeting that would -- where you all
18 would have gotten together and said, finally, we have been
19 going back and forth, now this is the decision. Do you have
20 notes of that?

21 **A.** No.

22 **Q.** Does anybody have notes of that?

23 **A.** No, not that I'm aware of.

24 **Q.** So you do the rationale, I think you said, that's what
25 you -- is that a portion of this letter somewhere that --

1 A. Yes. It starts with "John, comma, the hearing panel," so
2 probably second to last page.

3 Q. Okay.

4 A. Letter's approved by all of our staff as well, so we will
5 review them.

6 Q. "Doe, as the result of your involvement in these
7 incidents," is that where we are?

8 A. Couple Paragraphs before that.

9 Q. Okay.

10 A. There you go. Right where your finger was.

11 Q. "Doe, the hearing panel was charged with determining"?

12 A. Yes.

13 Q. That's -- you did that part of the letter up through the
14 end?

15 A. Uh-huh. And I worked on other parts of the letter as
16 well.

17 Q. Okay. And in terms of the sanction, is that decided -- or
18 in this instance was it decided at the same time that you
19 decided the responsibility finding?

20 A. I don't know if it was the exact same date, but it is
21 close to that.

22 Q. So under your procedures then Mr. Doe had seven days to
23 try to get somebody to take the case on for review, correct?

24 A. Seven days to file a case review, that's correct.

25 Q. And, of course, we're lawyers here, so I don't know if

1 this is going to make sense; but is the case review, the
2 application he's making, is have I stated enough for you to
3 even now consider what I'm giving to you and then there's a
4 case review that follows the consideration after you've gotten
5 over that initial threshold, is that the process?

6 **A.** I won't go into detail for timing purposes, but the
7 procedures are outlined very clearly on page 35.

8 **Q.** Well, actually, I will tell you, I'm confused so -- and
9 maybe they are clear -- but between that and some other
10 documents, so let me just -- to me it looks like Mr. Doe put
11 together a case review request, that it went to be reviewed to
12 determine whether he had stated either procedural defects that
13 were significant enough to affect the outcome or newly
14 discovered evidence that is significant enough to have changed
15 the outcome, right?

16 **A.** That is correct.

17 **Q.** And then he had to convince someone, and I'm going to ask
18 you who that someone is in a minute, but he had to convince
19 someone that what he had put in his papers was enough for then
20 the materials to then be picked up and handed off to a case
21 review board, is that correct?

22 **A.** Actually, the case review board is the board that decides
23 whether or not there's been a procedural defect or new
24 information, that's the Board.

25 **Q.** And in this instance am I correct that the review board

1 really never looked at the underlying file? They just looked
2 at what he had raised and decided that it didn't merit a
3 review, right?

4 **A.** I have no idea what the review is. We have no contact
5 with the case review.

6 **THE COURT:** Is it a *de novo* review, or is it just a
7 trying to determine if there were procedural defects?

8 **THE WITNESS:** They are just determining is there a
9 defect or is there new information which would have been
10 substantial enough to change. They are not rehearing the case.

11 **THE COURT:** Okay.

12 **BY MS. HAMILL:**

13 **Q.** I don't want to beat a dead horse, but I'm just confused
14 over it. I think there's a difference between, and for Judge
15 Simon it is like a petition to cert the Supreme Court, you try
16 to make your argument. You say, Court, I want you to hear my
17 case, but you have to make enough of a showing for the Court to
18 say, okay, I want to hear your case so come in on another day
19 and tell me the full story here.

20 And to me it looked like Mr. Doe's petition to be -- to
21 have that fuller hearing or *de novo* appeal review didn't
22 happen, that it was deemed that he didn't have enough in his
23 request to merit a full review of the underlying proceeding, is
24 that correct?

25 **A.** With all due respect, it is not correct. So what the

1 Board is looking for is, based on the information that he
2 provided, has he identified a procedural defect which would
3 have been substantial enough to change the outcome or
4 substantive new information which would have been substantial
5 enough to have changed the outcome.

6 So the Board is looking at, is there a defect? And if
7 there is, remand it back to the office with specific
8 instructions to correct the defect. So defect could have been,
9 you had a biased hearing panel member. Consider the
10 information with another person as an example. If it was
11 substantive new information which wasn't made available to the
12 student at the time of the administrative hearing and would
13 have been substantial enough to have changed, remand it back to
14 the office to consider that new information. But the Board is
15 the one who is responsible for determining those two things.

16 There's also a second provision on the procedural defect
17 where it can be referred to the Vice President if they don't
18 think the office can correct the defect.

19 **Q.** But you don't know who -- do you know who ever serves on
20 the conduct case review board?

21 **A.** So I am aware of who participates on it after the decision
22 is made. I am notified of who the members were through a form
23 they fill out.

24 **Q.** And who were they in this instance?

25 **A.** I don't remember exactly who it was to be honest with you.

1 Q. Is it one person or you said three people?

2 A. So it is three faculty or administrators.

3 Q. Well, Jane was able to respond to -- Mr. Doe filed a
4 request for case review on March 27th, correct?

5 A. I believe that was the date. That would have been the
6 deadline seven calendar days after the decision.

7 Q. I'm skipping a number here. This is Exhibit 12,
8 Plaintiff's Exhibit 12.

9 Mr. Willerton, is that --

10 MS. HAMILL: I see there are two because there were
11 two that were filed, right?

12 MR. GALLINARO: Yeah. You want the other one.

13 MS. HAMILL: Yeah.

14 BY MS. HAMILL:

15 Q. Just for purposes of the record -- first of all, do you --
16 you get to see the application that's made for a case review,
17 correct?

18 A. That is correct.

19 Q. Because you get to respond to it, right?

20 A. That is correct.

21 Q. Okay.

22 A. We have the opportunity. I'm sorry.

23 Q. Exhibit 12. Do you recognize Exhibit 12, which I'll, for
24 purposes of the record, identify as one of -- there were two
25 case review statements that were put into the record by

1 Mr. Doe. This is one of them. Do you recognize that?

2 A. I was aware there were two. This looks very familiar to
3 me. This looks like one of the documents.

4 Q. Okay. And then I'm going to -- for purposes of the
5 record, I'm showing you what's been marked as Plaintiff's
6 Exhibit 13, and that is the March 27, 2017, request by Mr. Doe
7 for case review. Do you recognize that document as well?

8 A. Similar to the last, that it looks familiar to what the
9 case review document was that was submitted.

10 Q. And you were then -- as part of the protocol then you are
11 given the request for case review to respond to it, right?

12 A. That is correct. We receive a copy, and we have the
13 option or the opportunity to file a response.

14 Q. And do you ever decline the invitation to provide a
15 response?

16 A. I can't think of the last time that I have not submitted a
17 response.

18 Q. And complainant also filed a response as well, correct?

19 A. That's correct.

20 Q. And you got to review that as well?

21 A. Yes, it was available to us.

22 Q. Now -- and I'm not going to belabor this because it is in
23 the record and in our pleadings -- but Mr. Doe raised quite a
24 number of procedural defects in his case review request,
25 correct?

1 A. Yes, he did.

2 Q. And some of those certainly went to the conduct of the
3 panel in terms of how the hearing was conducted, as well as his
4 access to records ahead of time, how much he was able to ask
5 certain types of questions at the hearing, right?

6 A. That sounds familiar.

7 Q. He also brought to the attention of both you, through
8 this, since you had access to it and respond to it, he brought
9 to the attention of you and the case review board that he had
10 some after-discovered evidence which were two videotapes of
11 Ms. Roe talking about, basically, wanting to ruin him prior to
12 two weeks prior to the hearing, right?

13 A. I don't remember when the videos were recorded, but there
14 were videos that were submitted, yes.

15 Q. You reviewed them, right?

16 A. Yes, I did review those.

17 Q. He also indicated there would be some additional witnesses
18 that could have -- having learned certain things through the
19 hearing that he could have or would have had witnesses that
20 would be available if this were allowed to be reviewed, right?

21 A. I believe that he referenced witness statements or
22 affidavits in his request.

23 Q. And then you -- I'm going to show you what's been marked
24 as Plaintiff's Exhibit 10. And is that your response to his
25 request for a case review that you addressed to the conduct

1 case review board?

2 **A.** Yes. This looks -- without reading word for word, this
3 looks very similar, same formatting, same letter.

4 **Q.** I'll flip to the back page just so -- well, actually it
5 doesn't have your signature, but it was produced by Notre Dame,
6 so presumably it is yours?

7 **A.** No, that's a letter I would have written, absolutely.

8 **Q.** Okay. And in that you systematically go through each of
9 the requests that Mr. Doe is making for review and basically
10 indicate to the review board that none of this is going to
11 matter, it doesn't affect the outcome, and there is no basis
12 for a case review, correct?

13 **A.** I believe what I articulated here, if I can read it for a
14 second --

15 **Q.** If you need a copy, I can --

16 **A.** This is okay. Thank you.

17 This context statement is so it wouldn't be repeated over
18 and over, and what we're saying is, there maybe more
19 information that is presented, however, the underlying behavior
20 is what we were responsible for evaluating and determining did
21 this violate our standards. So if another friend said, I've
22 never seen theme engage in violent behavior, that doesn't
23 change the messages that were sent; that was the intent of this
24 statement.

25 **Q.** So with respect to the video recording, the recordings

1 that Mr. Doe put into the record, you don't have any reason to
2 believe that he had access to it ahead of time? You don't --
3 that's not the basis for rejecting it? You just thought it
4 didn't in any way affect the outcome, correct?

5 **A.** To be honest with you, I have no idea when they were
6 recorded, who recorded them. They didn't change -- I'm sorry.
7 I apologize.

8 **Q.** That's not the basis for you saying they shouldn't be
9 considered, correct?

10 **A.** What I was saying in the letter is these behaviors still
11 happened.

12 **Q.** And you weren't concerned that Jane Roe was, prior to the
13 hearing, talking about wanting to take revenge on Mr. Doe?
14 That didn't affect your analysis at all, correct?

15 **A.** Related to the behaviors we had to evaluate and the text
16 messages and the phone calls, no.

17 **Q.** How about somebody's credibility in a hearing or tendency
18 to exaggerate because they are out to get somebody, isn't that
19 relevant?

20 **A.** So somebody's --

21 **Q.** If you could just answer a yes or no, and I know it is --
22 I'm not trying to shut you down. You can certainly explain.

23 **A.** Sure. Understand. Yes, that can affect credibility.

24 **Q.** And might she not also exaggerate how frightened she was
25 of John Doe? She's got this issue where she wants to take

1 revenge, right?

2 **A.** That's possible, and that's why we have a reasonable
3 person standard too.

4 **Q.** And don't you also have -- with respect to stalking it is
5 not just a reasonable person standard. The person actually has
6 to feel it so that when you have a subjective standard it
7 matters whether somebody is credible or not, right?

8 **A.** Credibility matters in administrative hearings, yes.

9 **Q.** And if somebody has a personal, revengeful attitude and
10 goes into a hearing and there's a subjective element to what
11 they are experiencing and credibility is an issue, that's going
12 to be a problem, right?

13 **A.** It could be, yes.

14 **Q.** Wasn't there also evidence in the record at the time of
15 the hearing that Ms. Roe had made several frivolous complaints
16 about Mr. Doe violating the no contact order?

17 **A.** I recall a report of a violation of a no contact order.

18 **Q.** And did you in any way address that in the hearing
19 process?

20 **A.** We talked about an incident that happened in a parking lot
21 with a truck; that was discussed at the administrative hearing.

22 **Q.** Were you aware at the time that the hearing took place on
23 February 24th that as of February 3, Mr. Doe had made a
24 complaint through Heather Ryan that he was being harassed by
25 Ms. Roe because she was making frivolous complaints that he was

1 violating the no contact order? Were you aware of that?

2 A. I don't recall that.

3 Q. Was that in any way addressed at the hearing?

4 A. Was Ms. Roe's behavior?

5 Q. Yes. Ms. Roe making frivolous no contact order violation
6 reports, was that in any way part of the hearing process?

7 A. Not that I recall, no.

8 Q. And there is nothing in your Code that would have
9 prevented you from considering those types of issues in the
10 context of the administrative hearing, correct? You can
11 combine these things?

12 A. True. If the report that we receive indicates that, that
13 we have a complainant and respondent and a respondent and
14 complainant, we can address it all together at that time. We
15 have done that before.

16 Q. But you didn't do it here, did you?

17 A. No.

18 Q. And, in fact, if Mr. Doe reported that he was feeling
19 harassed by Ms. Roe by her frivolous no contact order violation
20 reports as of February 3, shouldn't that have already moved its
21 way through your process if you have 60 days to move something
22 through under the guidelines? Shouldn't that have already gone
23 through your process?

24 A. I can't share how long an investigation takes or why or
25 why not it didn't come to us in that manner. Once again, when

1 we have the procedures, we have to follow the procedures. We
2 received a report with a complainant and a respondent, and we
3 adjudicated that matter.

4 **Q.** Did you see any videos that Ms. Roe had taken of Mr. Doe
5 scurrying by in a hallway 'cause he's afraid that he's going to
6 be anywhere near her? Did you see any of those videos in the
7 context of deliberating on this case?

8 **A.** In the context of deliberation, no.

9 **Q.** But in the context of being generally aware of the issues
10 in the case?

11 **A.** True. Before the administrative hearing, there was video
12 that was submitted, and one was walking in a hallway.

13 **Q.** But you didn't take into account -- and, again, I'm
14 getting at credibility and motive. If you've got a complainant
15 who is now using the process to harass the person she's
16 originally made a complaint against and she's constantly
17 reporting that he's violating the no contact order when he is
18 not, isn't that something that should be of concern when you're
19 in the deliberations you were in on February 24th that
20 Ms. Roe was abusing the process, that Mr. Doe had made a report
21 of that as of February 3 and shouldn't that have been
22 considered?

23 **A.** It shouldn't have been considered unless it was forwarded
24 to us as a report to address. So we received a report of a
25 complainant, Ms. Roe, a respondent, Mr. Doe, engaging in a

1 series of behaviors, text messages, et cetera; that's what we
2 adjudicated.

3 **Q.** So who would get that to you? It is Heather Ryan who
4 would decide whether that's going to be -- you said earlier we
5 can sometimes combine these into one hearing. Somebody made a
6 decision not to do that. Who made that decision?

7 **A.** So the investigations are managed by Heather; and when a
8 report is received by us, then we move -- I apologize with we.
9 I, the Office of Community Standards, moves forward with the
10 report that we receive based on the nature of that report.

11 **Q.** So I'm going to show you -- this is part of a larger
12 document that was marked as Plaintiff's Exhibit 47. I'm going
13 to actually take the binder clip off. It will make it easier
14 to see.

15 February 3. This is an e-mail to Heather Ryan from
16 Mr. Doe that says to her, and you can certainly read it, but
17 he's basically alleging that Ms. Roe, when they passed each
18 other on the stairwell because the counseling service had
19 accidentally put them both coming and going from their therapy
20 sessions and they passed each other on a stairway, that he
21 moved past her as quickly as he could and that she stopped and
22 turned around and basically smiled at him and filmed him as he
23 was trying to move up the stairs and reported that he was
24 feeling uncomfortable with that situation and unsafe. Do you
25 see that?

1 A. I never seen this e-mail before, but as you describe,
2 that's what it appears to be.

3 Q. And doesn't he say, "Thank you for letting me report this,
4 and please confirm with me when this has been officially been
5 reported. This impermissible form of contact has made me feel
6 very uncomfortable and unsafe on campus." He's making an
7 official report there, wouldn't you agree?

8 A. He's indicating it is a report.

9 Q. He's calling it an official report, correct?

10 A. A report.

11 Q. Right. He says, "If I need to do something more, let me
12 know," right? That's at the end.

13 A. Additional steps, correct.

14 Q. But you didn't have any knowledge of that 21 days later
15 when you deliberated or heard the issues between Jane Roe and
16 John Doe, correct?

17 A. I wasn't aware of that report.

18 Q. Do you think that would have been important for you in
19 terms of judging Jane Roe's credibility? Again, we are talking
20 about there is a subjective component, certainly to the
21 stalking, that she was engaging in this kind of behavior.
22 Don't you think that would have been relevant?

23 A. It could have been. I wouldn't say definitively, but it
24 certainly could have been.

25 Q. And you, in fact -- strike that.

1 Were you aware as well that there was an incident in late
2 January where Mr. Doe was sitting on a bench in a hallway
3 waiting to go into class with a friend of his and Ms. Roe
4 walked by and Mr. Doe went into his class and not moments later
5 was pulled out by the Notre Dame police. Are you aware of
6 that?

7 **A.** That's in the investigative report that we have.

8 **Q.** Did you consider that in any way, again, her making a
9 report of a no contact violation in that context when he is
10 just sitting on a bench with a fellow student? Did you
11 consider that in any way in judging her credibility or motive
12 in the context of the hearing?

13 **A.** No, we did not.

14 **Q.** Isn't it a violation of the student code to provide
15 deliberately false information in the context of the
16 administrative process?

17 **A.** I believe that's outlined in the red book.

18 **Q.** So the answer is yes?

19 **A.** I believe so, yes. I could check.

20 **Q.** I can probably --

21 **A.** This is a provision that we added within the last year if
22 I remember correctly.

23 **Q.** I can probably pull it up here. Let's see. I'm going to
24 put it up on the screen so you don't have to go through it.

25 **A.** Great.

1 Q. This is from Exhibit 1, *du lac*. I'll point to the
2 paragraph. "All university community members" --

3 A. Yep, that is correct.

4 Q. And the other part of this that I want to draw your
5 attention to, which we kind of already discussed, "In the event
6 that a respondent makes a complaint against a complainant, the
7 University may investigate that complaint at or about the same
8 time it investigates the original complaint. In the event that
9 both complaints are referred to the University Conduct Process,
10 both complaints may be simultaneously heard in a single
11 administrative hearing or heard separately."

12 So you had the -- had somebody made that decision, there
13 was nothing preventing you from hearing his conduct complaint
14 against her in the context of that February 24th hearing,
15 right?

16 A. That is correct.

17 Q. So I wanted to get back for a minute to your case review
18 response. And that's dated April 12th, correct?

19 A. Yes.

20 Q. One day later on April 13th Mr. Doe received the denial
21 of his conduct case review request, do you see that?

22 A. Yes.

23 Q. And it doesn't provide a lot of substance other than to
24 say he hasn't met the procedural defect or substantive new
25 information prongs that he'd have to meet, correct?

1 A. That is correct.

2 Q. What is your understanding of what the conduct review
3 board did to evaluate -- they get your response on
4 April 12th, and a day later they are telling him you are out
5 of luck here.

6 So what is your understanding of what the conduct review
7 board did in terms of looking at the record to determine
8 whether they should either remand as you have talked about or
9 take further action?

10 A. To be honest with you, I have no idea how they evaluate
11 it, what they read, what order they read.

12 Q. So we have to ask Mr. Anderson or somebody else who was on
13 the case review board?

14 A. That's correct. Mr. Anderson wouldn't have been in the
15 room either.

16 Q. He just coordinates it?

17 A. He just coordinates, that's correct.

18 Q. We've heard a lot of talk today about a second
19 investigative file that's into cross-allegations between Jane
20 and John. Is that referred onto your office yet?

21 A. Not yet.

22 Q. Okay. Just curious --

23 A. Not as of today.

24 Q. -- when you've got two seniors -- and Jane is going to be
25 finished with her coursework soon and taking her exams and

1 presumably graduating and moving on -- if there's an
2 investigation that's pending, what does the University do with
3 a graduating senior who has a pending investigation against
4 them?

5 **A.** So the University reserves the right to put a hold on a
6 diploma or hold on a transcript.

7 **Q.** So do you know in this instance is Jane going to have a
8 hold on her transcript or her diploma as a result of this
9 pending investigation?

10 **A.** I have no idea through the investigation that will happen.
11 With us --

12 **Q.** Who is going to make that determination?

13 **A.** If it happens in the investigation, it would be
14 Heather Ryan. If the case gets referred to us, it would be a
15 decision that I would make.

16 **Q.** Doesn't it complicate your job if both students have
17 graduated -- and I'm not talking about these two in particular.
18 I'm just talking about in general -- to not have combined the
19 issues that were raised between these two students, the back
20 and forth, to not have dealt with them in one administrative
21 proceeding when you have two students who are about to leave
22 the University. Wouldn't it have made sense to handle it all
23 in one proceeding?

24 **A.** If all the investigations were completed, to do them
25 together in one administrative proceeding, we have done that

1 before.

2 Q. Do you know what, if any, investigation was done in the
3 wake of Mr. Doe's February 3 official complaint about Ms. Roe's
4 harassing conduct?

5 A. I don't know about, quote-unquote, an official
6 investigation, if there were interviews related to that. There
7 was information, if I recall, in the actual documents that we
8 reviewed at the administrative hearing about the incident.

9 Q. In terms of -- I just want to talk a little bit about
10 discretion and shaping charges.

11 Is it your policy -- here Mr. Doe is charged with four
12 policy violations, and presumably for each of those it is
13 important that the university get it right in terms of the
14 ultimate outcome, correct?

15 A. True.

16 Q. So it is not enough to say, well, there were four charges
17 and at least two of them we've got absolute support for. Maybe
18 the other two are a little wobbly, but no harm no foul because
19 you could have been expelled for any one of them. That's not
20 appropriate, is it?

21 A. What we evaluate is the behavior the student engages in,
22 and I actually shared with Mr. Doe at his decision meeting when
23 we verbally communicated the decision and he said, I don't
24 think I'm responsible for this policy and this policy; and I
25 articulated to him, the behavior that you engaged in,

1 regardless if it is one standard of conduct or six standards of
2 conduct, is concerning enough where dismissal is appropriate.

3 Q. So my question was a little different.

4 A. Apologize.

5 Q. If on a case review somebody is found responsible for
6 four -- say any one of them could have led to dismissal and it
7 turns out that on the fourth one somebody looks at it and says,
8 you know what, there wasn't enough evidence of that or we got
9 new evidence in, we want the panel to go back and look at it.
10 They are not going to say, he would have been expelled anyway,
11 so we don't have to send this back because, who cares, it is
12 the fourth one. You have to get each one of them -- each one
13 of them has to be well founded in order to sustain a finding of
14 responsibility, correct?

15 A. When we refer to finding of responsibility, it is for each
16 of those policy questions.

17 Q. Right. So it is not good enough to get, oh, we are
18 batting 500, that's okay. We have enough on these two but not
19 on those two because he would have been expelled on those two
20 that we found him responsible for. You have to support the
21 decision for each policy violation where you find
22 responsibility, correct?

23 A. That is correct.

24 Q. And you've also got to apply the definitions of the policy
25 correctly when you find the violation, right?

1 A. That is correct.

2 Q. Did anyone -- did you consult with anyone on your
3 interpretation of dating violence or threats of physical
4 violence that it encompassed self harm where it wasn't
5 directed -- the harm wasn't directed at the complainant
6 but was --

7 A. I understand.

8 Q. -- was directed at the respondent? Did you have -- did
9 you consult with anybody over your interpretation of that
10 definition?

11 A. So I had a conversation with my supervisor. We have
12 weekly meetings. And I said, we're working through
13 deliberations, as I would with any other case. And I said,
14 there's a question related to dating violence, and the
15 interpretation of the hearing panel is, as we looked at the
16 language in the policy, was there a threat of violence? Yes.
17 Was there a dating relationship? Yes. And his comment back to
18 me was, If that is your decision, then that is your decision.
19 You need to be comfortable with your decision. That's what I
20 recall the conversation, but I did not call or consult or
21 research otherwise.

22 Q. So you basically looked at the language of the policy and
23 interpreted it as you have explained it and found Mr. Doe
24 responsible for that, correct?

25 A. That is correct.

1 Q. Now, you're not required to charge for every single
2 policy -- possible violation, right?

3 A. That is correct.

4 Q. So you could have in this instance done two of the four
5 but you -- correct?

6 A. That is correct.

7 Q. And I'm aware that the Office for Civil Rights, you can't
8 mediate issues involving sexual assault between students. I'm
9 aware of that in the Dear Colleague letter?

10 A. Correct.

11 Q. But doesn't it allow you to mediate something that's less
12 than that like harassment claims? Aren't you able to do that
13 under the federal guidelines?

14 A. Federal regulations, to my understanding, if it is a
15 harassment case, you could do that; that's an option.

16 Q. But Notre Dame didn't take that option here, correct?

17 A. Correct.

18 Q. And isn't it true also that many colleges and universities
19 as this area is evolving, and these are complicated cases,
20 complicated issues, especially when you have a relationship,
21 aren't there a lot of colleges and universities that are
22 turning to restorative justice, particularly in relationship
23 cases, so that they don't have the punitive we're going to find
24 you have violated certain charges here but we're going to work
25 with the students to move them on, get into healthier places?

1 Isn't that a trend?

2 **A.** A trend of using restorative justice in the conduct
3 process is something that is happening, and it is emerging.

4 **Q.** And Notre Dame, are you using that?

5 **A.** We are not using restorative justice now. We are actually
6 researching, and one of our staff members went to a conference
7 in January on it.

8 **Q.** I just want to ask you a couple of questions about the
9 school sanctioning powers. Once an investigation's underway,
10 and I'm looking at *du lac* and asking you this question, the
11 student can't just simply withdraw and walk away, right?

12 **A.** That's correct. The University allows -- has a provision
13 where we could not allow a student to withdraw or take a leave
14 of absence.

15 **Q.** And you also reserve the right as a university to place a
16 hold on a student's diploma or academic transcript pending the
17 investigation or resolution of a conduct matter, right?

18 **A.** Correct.

19 **Q.** In fact, the University can defer awarding a degree
20 pending full resolution of a conduct matter, correct?

21 **A.** Could you please repeat that?

22 **Q.** The University -- if somebody finished up their coursework
23 but still had a pending disciplinary matter, the University
24 could defer their degree or decide not to award it until there
25 was a resolution, right?

1 A. That is correct.

2 Q. And in this matter if John were allowed to take his exams,
3 finish his coursework, the University could still, though, put
4 a hold on his diploma, correct?

5 A. In this particular case, with the action that's happened
6 already -- I guess I'm just trying to seek clarification. Our
7 decision is made, so I can't change that. I can't change that.
8 Is it possible that -- he's not enrolled right now, so I don't
9 know how he could take his exams. I'm sorry.

10 Q. Yeah, I wasn't really asking that. I was just saying if
11 he were to complete his coursework, given the disciplinary
12 matter pending, that the school would have the ability, based
13 on what I was just talking about under *du lac*, to delay,
14 deferring -- defer awarding his diploma, correct?

15 A. If he wasn't dismissed; and if he wasn't dismissed --

16 THE COURT: I don't think that's what she's getting
17 at.

18 THE WITNESS: I apologize.

19 THE COURT: Let's take Jane Roe for example. She's
20 subject to a complaint right now.

21 THE WITNESS: That's correct.

22 THE COURT: Presumably she's going to graduate.
23 Maybe the complaint isn't wrapped up by the end of the time of
24 commencement. Can she complete her degree requirements but the
25 conferral of the diploma is withheld pending outcome of your

1 investigation?

2 **THE WITNESS:** That is absolutely correct.

3 **THE COURT:** Is that what you are getting at?

4 **MS. HAMILL:** Thank you. Much better than I was
5 doing.

6 **THE WITNESS:** I apologize.

7 **BY MS. HAMILL:**

8 **Q.** Mr. Willerton, you've been at the University for a long
9 time, so let me just ask you a couple of questions about if a
10 student has a gap in a transcript, and this may be -- because
11 you are not a registrar -- 'cause I know there is a lot of
12 silos in universities, but if a student has a gap in their
13 education record where they either have a semester where they
14 have an incomplete set of courses where they have been
15 separated from the University for a period of time, would you
16 agree with me that that creates a permanent mark on that
17 student's record?

18 **A.** Permanent mark on an academic transcript, yes.

19 **Q.** And would you agree with me that it is permanent, correct?

20 **A.** That is correct.

21 **Q.** And somebody with that type of gap would forever have to
22 explain either to a subsequent -- either a transferring school,
23 graduate school, professional school, or an employer, why do
24 you have this gap in your transcript, right?

25 **A.** If asked, correct.

1 Q. And that could be a problem for, given the environment
2 we're in these days, that can be a real problem for a student,
3 correct?

4 A. For some students, yes.

5 Q. And you don't have any reason to doubt that Mr. Doe has a
6 job waiting for him if he can complete his coursework at
7 Notre Dame?

8 A. I'm not aware of that, but it is common with many
9 graduating seniors.

10 Q. And for many graduating seniors you're very lucky if you
11 have that job waiting for you as you leave the school, correct?

12 A. I'm not sure percentages, but, yes, it is nice to have
13 that.

14 Q. It is a tough market today?

15 A. I'm not sure if it is a tough market.

16 Q. Notre Dame grads do very well though.

17 **MS. HAMILL:** If I can just take a few moments, Your
18 Honor, to look at -- I'm trying to be efficient here. And I'm
19 sure I have a couple more questions, but I want to just be very
20 efficient about it.

21 **THE COURT:** Sure.

22 While you're doing that, we're going to take a five-minute
23 break so I can give my court reporter a break, and I need to
24 use the facilities here.

25 **MS. HAMILL:** That's fine, Your Honor.

1 (A recess was had at 4:58 p.m.)

2 (The following proceedings were held in open court
3 beginning at 5:06 p.m., reported as follows:)

4 **THE COURT:** Ms. Hamill, how much longer are you going
5 to have here?

6 **MS. HAMILL:** Probably about 10 minutes or so.

7 **THE COURT:** Proceed.

8 **MS. HAMILL:** Okay. Thank you, Your Honor.

9 **THE COURT:** Before you do that, give me a preview
10 there.

11 I assume you are going to have substantial questions for
12 this witness.

13 Are you going to be calling any additional witnesses?

14 **MS. HAMILL:** No, Your Honor.

15 **THE COURT:** Do you think you anticipate calling any
16 additional witnesses?

17 **MR. LEICHTY:** Your Honor, we would have considered
18 Mr. Doe. I'm happy to, in lieu of that, and if other counsel
19 will stipulate, submit certain exhibits, some text messages and
20 some other things for Your Honor to read rather than going
21 through those one by one with Mr. Doe and some information from
22 the transcript of the hearing in lieu of that to make this more
23 efficient. I might offer that up as an option to the Court and
24 opposing counsel.

25 **MS. HAMILL:** I can also possibly -- we were going to

1 put in Jane Roe's affidavit of her production, but we can just
2 do that -- and I was going to also just put in, again, just a
3 sample text message thing, but, again, we can stipulate to
4 that. So I don't need to question Mr. Willerton about that.

5 I then probably have two questions for him. Let me just
6 make sure. I have basically two questions.

7 **THE COURT:** Okay. Why don't you go ahead then.

8 **MR. LEICHTY:** I do have an affidavit from Ms. Roe
9 that we would submit as well, Your Honor, to discuss that one
10 video that came up today.

11 **THE COURT:** Yes. Okay.

12 **DIRECT EXAMINATION (Continued)**

13 **BY MS. HAMILL:**

14 **Q.** Okay. Mr. Willerton, just a couple more questions here.

15 This is an exhibit -- Defense Exhibit 121 which outlines
16 the Notre Dame process under *du lac*, and I just want to, sort
17 of, conform with your testimony.

18 There's a section here that says November 29, 2016, notice
19 of charges to Mr. Doe, and then over here is the February 13
20 OCS notified the hearing. And we looked at the February 13th
21 letter that outlined for Mr. Doe the four charges that the
22 administrative hearing was going to be focused on, correct?

23 **A.** That's right.

24 **Q.** So, in fact, just in terms of a notice of charges, isn't
25 it really the February 13th, 2017, letter that really is the

1 notice of charges rather than this November 29 general letter
2 that went out from Heather Ryan?

3 **A.** Within our process, I would refer to our letter, the
4 February 13th, as the notice of charges.

5 **Q.** Okay. Thank you.

6 I'm going to -- I think I'm skipping an exhibit, but I'll
7 go with this. Exhibit 15 I'm going to put here on the ELMO.

8 Just for the record, Exhibit 15 is a notice from the
9 Office for Civil Rights dated September 23, 2016, regarding the
10 OCR determining that they will be moving forward with an
11 investigation relating to Notre Dame, do you see that?

12 **A.** I see it on the screen, yes.

13 **Q.** You are aware that Notre Dame has currently pending two
14 open investigations from the Office for Civil Rights involving
15 its handling of sexual misconduct issues?

16 **A.** I'm not sure of the exact number, but I'm aware of
17 investigations.

18 **Q.** And you're -- just looking at this December 23rd letter,
19 this was brought, in the second paragraph, related to a female
20 undergraduate student who believes that the University did not
21 promptly and equitably respond to complaints, reports under
22 incidents of sexual violence, do you see that?

23 **A.** I see that.

24 **Q.** Okay. And is the -- you said you are aware of a number of
25 investigations. Is the other -- whatever you are aware of, are

1 the other investigations also similar to this involving the
2 same types of claims?

3 **A.** To be honest with you, I have no idea what this is. I'm
4 aware of other OCR investigations. I provided interview
5 statements for one of them. I'm aware -- obviously, this is an
6 official letter. I don't know if it is the exact same claims
7 or same procedural concerns.

8 **Q.** Who would handle that for the University, responding to --

9 **A.** Responding?

10 **Q.** Yeah.

11 **A.** It would be the Office of General Counsel is my
12 understanding.

13 **Q.** Okay. And I see this is written to Ms. Laura Dunn.
14 Presumably she's the counsel or the representative for the
15 complaining student, and I see she's also a member of Serve
16 Justice, Inc., do you see that there?

17 **A.** Yes.

18 **Q.** And that's the same organization Ms. Roe's adviser was
19 from as well, correct?

20 **A.** That's my understanding, correct.

21 **MS. HAMILL:** Thank you.

22 Your Honor, I'm going to move into the record the various
23 exhibits that I used in my examination of Mr. Willerton.

24 **THE COURT:** Do you have any objection to any of the
25 exhibits that were discussed during her examination of this

1 witness?

2 **MR. LEICHTY:** No, Your Honor.

3 **THE COURT:** All right. They'll all be admitted.

4 (Plaintiff's Exhibit Nos. 1, 2, 4, 5, 7, 8, 9, 10, 12, 13,
5 14, 15, 16, 17, 47, previously marked, were admitted in
6 evidence.)

7 **MS. HAMILL:** Thank you, Your Honor. And then we'll
8 work with counsel in terms of submission of a couple of others.

9 **THE COURT:** Okay.

10 **MS. HAMILL:** Thank you, Your Honor.

11 Thank you, Mr. Willerton.

12 **THE COURT:** Thank you.

13 Cross.

14 **MR. LEICHTY:** Thank you, Your Honor.

15 **CROSS-EXAMINATION**

16 **BY MR. LEICHTY:**

17 **Q.** Good afternoon, Mr. Willerton.

18 **A.** Good afternoon.

19 **Q.** I know we're late here on a Friday, so I'm going to
20 attempt to be efficient with some follow-up questions okay,
21 sir?

22 **A.** Sure.

23 **Q.** We covered your employment background. I don't want to
24 rehash that. I don't believe we covered your educational
25 background. Could you share that with the Court, please?

1 A. Sure. 1996, Bradley University, undergraduate degree,
2 Spanish Secondary Education with Honors; 1998, Eastern Illinois
3 University, Masters of Science in Education studying
4 Educational Psychology and Guidance, also known as College
5 Student Affairs.

6 Q. Mr. Willerton, I understand you were involved in the
7 process of helping to develop the procedures we find in *du lac*,
8 is that right?

9 A. That is correct.

10 Q. Can you share with the Court what your involvement was in
11 that regard?

12 A. Sure. So my office's responsibility and my direct
13 responsibility is to publish our Code of Conduct or *du lac*, A
14 Guide to Student Life, our student handbook; so on an annual
15 basis I gather feedback from a variety of entities on campus,
16 whether they be administrators, student feedback, students who
17 have participated in our process with feedback. And then what
18 we would do is meet with various offices, my supervisor and
19 Associate Vice President for Student Affairs; and then our Vice
20 President for Student Affairs signs off on all the procedures.
21 We have meetings with our general counsel to review anything
22 that may have federal regulations that would be impacted by it.
23 We seek feedback from other administrators on campus as well.
24 It is a collaborative effort. It is not a independent effort
25 where I just decide what the procedures are. We get feedback

1 and guidance, and then our Vice President for Student Affairs
2 would give the approval.

3 **Q.** Okay. I don't think you had the opportunity to speak as
4 to what the purpose of *du lac* is for the University of
5 Notre Dame. What that purpose?

6 **A.** Sure. So *du lac* is our student handbook. Not only does
7 it provide resources, as I referenced earlier, it provides a
8 code of conduct. I believe I may have mentioned this concept
9 of creating a Catholic community that respects the human
10 dignity of every individual, and that's really what we hope
11 for.

12 So the Standards of Conduct, some people call them rules,
13 some people call them student life policies, we create a set of
14 standards and expectations. And those expectations are higher
15 than public order. They are expectations we have for our
16 students to say, Within this community, this is what we expect
17 of you, clearly articulated on one page in our student handbook
18 with bullet points, and they are linked off on a web page if
19 there's additional information such as some of these policies
20 so students are aware of those.

21 **Q.** Mr. Willerton, let me show you what we marked as
22 Exhibit 100.

23 Do you recognize that?

24 **A.** Yeah. This is a philosophical statement under the
25 Community Standard section of *du lac*, the student handbook, and

1 this really talks about the philosophy and the ethos. And in
2 the second paragraph, we talk about calling one another to
3 accountability, and we all share this responsibility as a
4 community.

5 So within our reporting procedures, it is not a vindictive
6 process. It is not a process where somebody is out to get
7 somebody. It is somebody who says, there is behavior that has
8 impacted me, there's behavior that maybe has impacted others,
9 and I want the University to see if this behavior aligns with
10 our expectations for conduct. And that's why we have the
11 educational process to engage in the dialogue in any of those
12 four settings.

13 **MR. LEICHTY:** We move for admission of Exhibit 100.

14 **THE COURT:** Any objection?

15 **MS. HAMILL:** No, Your Honor.

16 **THE COURT:** It is admitted.

17 (Defendant's Exhibit No. 100, previously marked, was
18 admitted in evidence.)

19 **BY MR. LEICHTY:**

20 **Q.** Mr. Willerton, is the process that University of
21 Notre Dame follows in investigating and then adjudicating a
22 policy question meant to mimic, say, a criminal court of law?

23 **A.** It is not.

24 **Q.** And could you explain why not?

25 **A.** Sure. I think we alluded to this a little bit earlier.

1 But what it is is an educational constitution. We are creating
2 a culture not only of accountability but also that Catholic
3 community where we respect the dignity of each other. So the
4 process that we create engages students in dialogue through a
5 progressive system, but we are also influenced by federal
6 regulations to ensure we are upholding the expectations our
7 government has placed on a very serious issue. We've adapted
8 those regulations into our educational process as much as
9 possible so it doesn't have a look and a feel like a legal
10 proceeding.

11 We are not putting people in jail. We are not taking away
12 their civil rights. We're holding them accountable and
13 sometimes that accountability says somebody needs to take time
14 off or they can't study at this institution in particular.

15 **Q.** Has Notre Dame done benchmarking for its procedures we
16 find in *du lac*?

17 **A.** Our annual review, if we are going to be making any
18 substantive changes, we have a set of about 16 peer
19 institutions, whether these be Catholic universities, similar
20 type of enrollment students, Rice, Duke, Vanderbilt, et cetera.
21 So we'll benchmark what their procedures are, and we will
22 modify many of our standards or many of our procedures based on
23 best practices.

24 **Q.** And have other schools ever looked to Notre Dame's
25 procedures in terms of best practices?

1 A. Yes. So I've been contacted before directly. I know
2 other university entities have been contacted. We had visitors
3 come to campus to do a comprehensive review and understand how
4 our process works. We have state meetings on an annual basis
5 with Directors of Student Conduct at the major institutions,
6 Ball State, Purdue, IUPUI, et cetera, where we share
7 information about what's working and how can we refine our
8 processes.

9 Q. I think you made reference earlier today to what was
10 called single investigator model. What is that?

11 A. A single investigator model is something that has come up
12 within the last few years particularly related in response to
13 federal regulations with how college campuses are expected to
14 manage these proceedings.

15 So there are different lines of thought. There are some
16 consultants in higher education who say there needs to be,
17 quote-unquote, some type of hearing. We hear this phrase
18 within our field; and for them, some type of hearing means an
19 investigation with the ability to share information and then a
20 decision will be reached and then an appeal process after that.

21 So a single investigator model would be one person
22 investigating, that same person reaching a decision of a
23 finding of responsibility, and in some cases that person also
24 assigning sanctions or outcomes as we call them.

25 Q. And is it fair to say Notre Dame goes well beyond that

1 model, right?

2 MS. HAMILL: Objection. Leading.

3 THE COURT: Overruled.

4 BY MR. LEICHTY:

5 Q. Let me ask this way. Was there an actual hearing in this
6 case?

7 A. Yes.

8 Q. How long was the hearing?

9 A. With breaks included, about six hours.

10 Q. How many witnesses were allowed to present their
11 perspectives on what transpired here?

12 A. Number of witnesses who clarified information at the
13 administrative hearing, whether it be a phone or in person, I
14 think it was around six. Six, maybe eight. I think it was
15 sixish.

16 Q. It included the involvement of Ms. Doe, right -- or
17 Ms. Roe?

18 A. That is correct.

19 Q. And was Mr. Doe able to speak at this hearing as well?

20 A. That is correct.

21 Q. Now, what, sort of, notice is provided by your office to
22 Mr. Doe when there's going to be this hearing after the
23 administration -- administrative investigation has been done?

24 A. So our notice -- what ends up happening is we receive the
25 report, and then we send an e-mail to the student to say, we've

1 received a report. We would like to meet with you to explain
2 the process to you. We don't just send that February 13th
3 letter. We actually meet with the student. They can invite an
4 adviser. Adviser can listen in via phone if necessary.

5 What we walk through is pages 26 to 32 in this book, line
6 by line, virtually word by word, to ensure that a student
7 understands this is what's going to happen, these are the
8 procedures that were outlined in our Code of Conduct for this
9 year and we're expected to follow.

10 Q. Mr. Willerton, when you are talking about this book, you
11 are talking about Exhibit 107, the red book?

12 A. The red book, that's correct.

13 Q. Let me show you what's marked as Exhibit 105. I think it
14 might have been marked as a plaintiff's exhibit already. You
15 recognize this?

16 A. Yes, this is the administrative hearing notification
17 letter.

18 Q. Okay. And I would like to go through this in a little
19 more detail than we have already, okay. This is sent to
20 Mr. Doe when?

21 A. February 13 electronically.

22 Q. All right. Is he advised of the hearing date?

23 A. Yes, in the first paragraph. Hearing date, time, and
24 location.

25 Q. Right there?

1 A. Yes.

2 Q. All right. Is there a description given to Mr. Doe as to
3 what this administrative hearing will entail?

4 A. Yes. So the link on the next paragraph where we talk
5 about the administrative hearing as a formal setting, that
6 links into the red book here to describe all of the processes
7 that we will follow.

8 Q. Okay. Yeah, I see under administrative hearing there's an
9 underline here. That's an actual link to a website?

10 A. That's correct.

11 Q. All right. So I see at the top of the letter this is sent
12 electronically to Mr. Doe. Is he able to click on the links
13 that are underlined to go find more information?

14 A. That's correct.

15 Q. Is Mr. Doe advised of the policy questions that are going
16 to be at the administrative hearing?

17 A. That's correct. The bullet points are the policy
18 questions.

19 Q. All right. We have stalking, right?

20 A. Yes, correct.

21 Q. Willfull damage to the reputation or psychological
22 well-being of another?

23 A. Yes.

24 Q. Dating violence?

25 A. Yes.

1 Q. Abusing or harassing behavior, including unwelcome
2 communication, correct?

3 A. That's correct.

4 Q. And, again, these are all underlined, so do those take
5 Mr. Doe to some portion of *du lac* or policies at Notre Dame to
6 explain what these mean?

7 A. That's correct. The link would go right to the student
8 handbook that's available online.

9 Q. Okay. Is there information provided to Mr. Doe about what
10 the hearing panel will do?

11 A. That's in the next paragraph. So it talks about how we
12 will evaluate the information presented. We use the
13 preponderance of the evidence. We have to consider all
14 available information and determine if more likely than not a
15 violation occurred. And then we also identify if there is a
16 finding of responsibility; it is possible that it could be
17 permanent dismissal.

18 Q. Okay. So that's listed as a potential conduct process
19 outcome?

20 A. That's correct. Some people call those sanctions.

21 Q. Does it advise Mr. Doe as to his ability to review
22 materials that came out in the administrative investigation?

23 A. That's the next paragraph which describes reasonably
24 available, eight to five, call, e-mail, schedule an appointment
25 to come in, adviser can join the student as well. This can be

1 any adviser as long as it is not a witness who will be
2 participating at the administrative hearing. Adviser can
3 change day-to-day; that's common.

4 But this articulates that the investigation documents must
5 stay in our office. We don't want these distributed publicly
6 and online out of a concern for privacy for our students.

7 **Q.** Let's pause here for a moment and talk about that subject
8 a little more.

9 Did Mr. Doe make arrangements to come and review the
10 materials that were part of the administrative investigation?

11 **A.** Yes. So he could e-mail or call. I believe he did both,
12 so we all have shared calendars in the office. Our
13 administrative assistant, whenever we receive a request to
14 review documents, would put an entry on our personal calendar
15 so we know that this student is in our office reviewing the
16 documents at this time. Since we manage multiple cases, we
17 want to ensure we don't have -- or that we have enough space
18 for everybody.

19 **Q.** All right. Let me show you what we've marked as
20 Exhibit 103, Mr. Willerton. Do you recognize that?

21 **A.** Yes. That's a screen shot from my Google calendar.

22 **Q.** And what does that reflect?

23 **A.** Sure. So the dates on the left are the dates that Mr. Doe
24 requested to come in to review the documents. The times are
25 the times he either identified when he would start to come in,

1 or if he identified an exact particular time, we would identify
2 that. So if a student would say for February 22, I'm not sure
3 if that was for this case, they say, I would like to come in at
4 11:30, we typically block it out the rest of the day. That
5 doesn't mean the student was here for five-and-a-half hours.

6 **Q.** Okay. So we're not sure that Mr. Doe was able to actually
7 go -- or actually took the opportunity to go review the
8 materials during these dates and times, but he certainly booked
9 them, is that what this is?

10 **A.** Yes.

11 **MR. LEICHTY:** Okay. Your Honor, at this time we move
12 for admission of Exhibit 103, and I see I need to do some
13 redaction there.

14 **THE COURT:** Yeah. Okay. That will be admitted
15 subject to -- I assume you have no objection?

16 **MS. HAMILL:** No. No, Your Honor, no objection.

17 **THE COURT:** Subject to being redacted, 103 is
18 admitted.

19 (Defendant's Exhibit No. 103, previously marked, was
20 admitted in evidence.)

21 **BY MR. LEICHTY:**

22 **Q.** One more item, Mr. Willerton. I understand, according to
23 the procedures in *du lac*, there's this option to supplement
24 documents four days before the hearing and then opportunity for
25 the complainant, respondent two days before the hearing to

1 review the material, is that right?

2 A. That's correct.

3 Q. When was the hearing date again?

4 A. Friday, February 24.

5 Q. Okay. When were the supplement materials provided to OCS?

6 A. They were required to be submitted by Monday,
7 February 20th.

8 Q. Okay. And did, in fact, Ms. Doe submit supplement
9 materials?

10 A. Yes.

11 Q. Do you recall roughly how many materials?

12 A. Exact pages not off the top of my head, but it was
13 significant.

14 Q. Did Mr. Doe as well submit supplement documentation?

15 A. Yes, he did.

16 Q. I see that from February 20th when that supplement
17 documentation was provided that Mr. Doe at least booked times
18 to review the materials three days before the administrative
19 hearing.

20 Is there a reason why there's three days booked for
21 reviewing these materials as opposed to the two that *du lac*
22 anticipated?

23 A. Sure. So students sometimes book the day after the fourth
24 day to review documents that may have come in if they are ready
25 to be reviewed. We guarantee two days. In this case our

1 Assistant Director, who happened to be Amber in this case,
2 turned around all the documents that were submitted on Monday
3 night, so our deadline is 11:59 p.m. that Monday night. She
4 turned it around that Monday morning and sent e-mails to the
5 complainant and respondent to say they are actually available
6 today so rather than two days, two-and-a-half days.

7 Q. So he was given more time?

8 A. Correct.

9 Q. As was Ms. Roe?

10 A. Correct.

11 Q. I'm going back to Exhibit 105, Mr. Willerton, and now we
12 are on page 2.

13 Is there information given to Mr. Doe about an adviser of
14 his choice?

15 A. Yep. That's the first full paragraph on that page. The
16 adviser of their choice can be anybody, no restriction.

17 Q. In this case did Mr. Doe obtain an adviser?

18 A. There was an adviser present at the administrative
19 hearing, and from the times I saw him in the office, he had an
20 adviser when he was reviewing documents. Not all of the time
21 but most of the time.

22 Q. At the administrative hearing, was his adviser an
23 attorney?

24 A. I believe so, yes.

25 Q. Okay. Does Notre Dame restrict in any way the ability of

1 the adviser, in this case an attorney, to consult with Mr. Doe
2 in the course of the administrative hearing?

3 **A.** We actually will take as many breaks as needed provided
4 that it doesn't disrupt the flow of the administrative hearing,
5 so anytime we take a break, we provide a meeting space for the
6 student to confer with their adviser.

7 **Q.** In the course of this communication with Mr. Doe, is he
8 advised about what his rights are at the hearing in terms of
9 addressing the information before the panel?

10 **A.** Yep. So the next paragraph talks about the opportunity to
11 clarify information that was presented through the
12 administrative investigation, talks about the opportunity to
13 submit questions in writing for consideration. Consideration
14 is the key word to be asked, and that's for both students.

15 **Q.** And did Mr. Doe, in fact, at times clarify information or
16 try to clarify information at the administrative hearing?

17 **A.** Absolutely.

18 **Q.** Did he submit questions in writing to the panel for its
19 consideration to ask of witnesses?

20 **A.** Yes.

21 **Q.** And we have a transcript of the entire hearing too that we
22 can go through, but do you recall at the administrative hearing
23 whether Mr. Doe was given the opportunity to ask additional
24 questions of witnesses as they came before the panel?

25 **A.** That is correct.

1 Q. Did at times he elect to do so?

2 A. I'd have to verify in the transcript. It's certainly
3 possible. I would assume so, but I wouldn't want to speak
4 definitively that he did.

5 Q. We can look at the transcript here too. Do you recall at
6 times he elected not to do so?

7 A. I believe so, yes.

8 Q. We've talked a little bit about the supplemental
9 documentation option given to the students. You see that here
10 in this letter as well?

11 A. Yes.

12 Q. So we have the --

13 A. Deadlines, four calendar days before the administrative
14 hearing. We spell it out so they know what four days is
15 before.

16 And, pardon me, all of these are also just verbatim right
17 out of the booklet too.

18 Q. And I guess to that point, aside from the student's
19 ability to read it in *du lac*, to receive it in this letter, is
20 there any informational meeting that is held with and, in fact,
21 was held with Mr. Doe in advance of this administrative
22 hearing?

23 A. Yeah, that was on Friday, February 10.

24 Q. Okay. And what's the purpose of that informational
25 meeting on February 10?

1 A. The purpose of that is to review the procedures so a
2 student can be as educated and prepared as possible, put a name
3 with the face with our office as well so they understand you
4 are now in the next phase. This is the University conduct
5 process or the administrative hearing.

6 Q. Okay. We heard from Ms. Ryan earlier about a meeting that
7 she had with Mr. Doe. We are not talking about the same
8 meeting though, right?

9 A. No, those are completely separate.

10 Q. All right. And the purpose of this meeting is specific to
11 this administrative hearing that's up and coming?

12 A. That's correct.

13 Q. Does this letter advise Mr. Doe of his right to invite
14 witnesses to appear?

15 A. Yes, that's the large paragraph. So, once again, we'll
16 provide a lot of information directly out of our procedures and
17 our Code of Conduct. We clarify what a witness to the incident
18 is. We clarify that both the respondent and complainant can
19 submit requests for additional witnesses that the hearing panel
20 hasn't already invited. If the hearing panel identifies
21 witnesses, we will notify the students at this time, and we
22 identified four students in this case that in our minds may
23 have information that needs to be clarified based on what their
24 original statement was that they provided.

25 Q. Mr. Doe is aware of at least the witnesses that are of

1 interest to the hearing panel come this administrative hearing?

2 A. Correct.

3 Q. There was some discussion earlier about what type of
4 witnesses are appropriate to appear at the hearing under
5 *du lac*, right?

6 A. Uh-huh.

7 Q. And you mention there was a definition of --

8 A. In the middle of the paragraph, "the witness to the
9 incident."

10 Q. Witness to incident.

11 A. And then we provide that definition so a student knows
12 exactly what we are talking about.

13 Q. Is that a carryover from the definition in *du lac*?

14 A. Yes. That tracks the definition. That's the same
15 definition as appears in *du lac*, and that's on page 29, 11B, as
16 in boy.

17 Q. And is that definition, the witness to the incident,
18 applicable to both complainants and respondents?

19 A. That is correct.

20 Q. Are complainants and respondents treated differently in
21 terms of the witnesses they may call as witness to the incident
22 is defined?

23 A. They are provided the exact same opportunities, treated
24 the exact same.

25 Q. Are men and women treated differently in terms of the

1 witnesses to the incident they may call?

2 A. In no way.

3 Q. I'm going to show you what's Exhibit 107. This is the red
4 book, right?

5 A. Yes.

6 Q. Page 29.

7 A. Yep.

8 Q. 11B, you see the definition of witness to the incident?

9 A. Yes.

10 Q. And how long has that been in *du lac*?

11 A. Would have been at least possibly two, three years. This
12 was specific language that we added based on best practices and
13 feedback we received from students in the process.

14 Q. All right.

15 **THE COURT:** This seems to suggest that an incident is
16 like a photograph as opposed to a motion picture, you know what
17 I mean?

18 **THE WITNESS:** I understand.

19 **THE COURT:** And so our case here strikes me more as a
20 motion picture, right? I mean, you have allegations of conduct
21 going on over a course of two or three months which -- how does
22 that dovetail with what you are talking about here?

23 **THE WITNESS:** When we talk about an incident to the
24 context of a relationship, it's something that happened in
25 particular during that relationship. So it was the night at

1 the bar when X happened. It was the night that I drove to the
2 bridge and threatened to kill myself.

3 **THE COURT:** But in this case the allegation is there
4 are a series of texts that occurred over the span of a couple
5 of months where he was repeatedly threatening to kill himself,
6 so what would be "the incident" that would, sort of, dictate
7 who could be a witness?

8 **THE WITNESS:** So it would be related to one of those
9 threads. We would consider that. We wouldn't just say on this
10 date with this one text message. If it is a thread that
11 carries on for a day and a student had a conversation with
12 somebody at the end of that thread, certainly that would be an
13 eligible witness to the incident.

14 I guess I would also share, Judge Simon, we're very
15 liberal with witness to the incident when it comes to an
16 incident. So in the context of a relationship, if a student
17 says, this person can provide context to the few times we went
18 to dinner over the course of the summer and how I interacted
19 with them and how I did not engage in a particular behavior;
20 that's --

21 **THE COURT:** But you've already testified a mental
22 health provider isn't a witness to the incident?

23 **THE WITNESS:** That's correct.

24 **BY MR. LEICHTY:**

25 **Q.** Does your letter speak to the decision-making process?

1 **A.** So what we communicate to students is that we'll schedule
2 the separate decision meeting; so as a courtesy to students, we
3 don't just send them a letter. We actually meet with them in
4 person or offer to meet with them in person to communicate the
5 decision and explain the case review process so they have an
6 understanding of what it looks like.

7 And then in writing we would send a letter electronically
8 as well as provide it hard copy if a student chose to meet with
9 us in person. There are some students that choose not to meet.
10 They just say, just send me a letter. Then we would just send
11 the letter. It would be at the same time, simultaneous written
12 notification.

13 **Q.** In this case, in addition to providing Mr. Doe a letter,
14 was there an in-person meeting held with the student?

15 **A.** Yes. With Mr. Doe, yes.

16 **Q.** Yes, sir.

17 How long was that meeting?

18 **A.** Length of the meeting -- I think the initial portion of
19 the meeting maybe 15, 20 minutes. We offered him the
20 opportunity for us to step out, and I would stay around if he
21 wanted to talk to his adviser. He had an adviser. I don't
22 recall who it was. It wasn't the person at the actual
23 administrative hearing. I offered to say, I can step out if
24 you would like to talk to your adviser. He opted to do that.
25 I walked down the hall 10, maybe 15 minutes and waited in case

1 he had questions.

2 Q. I want to back up a little bit in time. When you received
3 the large, sort of, administrative investigation file and did
4 so in this particular case, did you review the materials?

5 A. Yes.

6 Q. How did you go about reviewing those materials?

7 A. So there's the initial review that I mentioned where we
8 look at the policy questions, identify witnesses. And then as
9 time permits, I'll look at particular sections more in depth in
10 the days leading up to the administrative hearing. And then
11 for myself, I can't speak for the other members of the hearing
12 panel, but for myself, day of the administrative hearing, wake
13 up very early, 3:30, four o'clock, pull out the binder, verify
14 that I have all my flags in page by page by page, check my
15 highlights, check any notes that I would make, but a lot of it
16 are just flags and tabs to ensure that if there's a question I
17 can identify where that question may have come from.

18 Q. Mr. Willerton, I want to show you a transcript from the
19 administrative hearing, okay.

20 A. Okay.

21 Q. I have marked a few of these sections in terms of whether
22 Mr. Doe was able to ask questions or elected to do so or not,
23 and I want to see if this refreshes your memory in terms of
24 what transpired.

25 So I'm going to show you what's page 183 of the

1 transcript. And just for the record, we've marked this as
2 Exhibit 138, and we can move for its admission later.

3 You see the discussion there between the complainant,
4 respondent, and Ms. Monroe?

5 **A.** Yes.

6 **Q.** And Ms. Monroe, again, is who?

7 **A.** She's our Assistant Director of Community Standards, one
8 of the members of the hearing panel.

9 **Q.** Okay. And Ms. Monroe says, "Okay. Thank you. Are there
10 any other questions?"

11 The complainant, Ms. Roe, says, "No," right?

12 **A.** Correct.

13 **Q.** And then Ms. Monroe says, "How about you, Mr. Doe?"

14 The respondent says, "I probably have one," right?

15 **A.** Yes.

16 **Q.** Then as I understand -- let me ask. What is the process
17 if a respondent or complainant then has a question?

18 **A.** So they have -- if they don't have a typed question ready
19 to go, which some students do, we also provide a pad of paper
20 and pens. And what we instruct students to do is if you have a
21 question, just jot it down, don't worry about grammar, submit
22 it to a member of the hearing panel.

23 We'll look at that question and determine, is it an
24 appropriate question, is this a victim-blaming question, do we
25 need to rephrase the question; so rephrasing questions is very

1 common. And then if it is an appropriate question we would
2 ask.

3 Q. Okay. And in this particular instance we see that
4 Ms. Monroe then takes the question from Mr. Doe and poses it to
5 the witness, correct?

6 A. That's correct.

7 Q. All right.

8 THE COURT: What do you mean by "victim blaming"?

9 THE WITNESS: So "victim blaming" is a common term in
10 the field of higher education where questions typically come
11 from respondents towards complainants saying, for example, if
12 there was a sexual assault, well, you could have just left.
13 You could have just closed your legs. You shouldn't have worn
14 a short skirt that night. That's a victim-blaming question.
15 It is this is your fault that a sexual assault happened. You
16 could have just turned off your phone, and you wouldn't have
17 gotten these messages. That's a legitimate question for us to
18 ask. Some people could consider it victim blaming, that one.
19 That's a legitimate question. So there's a fine line and a
20 balance, and that's why we rephrase questions so it is more
21 appropriate.

22 THE COURT: I see.

23 BY MR. LEICHTY:

24 Q. Mr. Willerton, I'm showing you what's page 194 in this
25 transcript.

1 You see again where the respondent, Mr. Doe, indicates he
2 wants to ask one question?

3 **A.** Yes.

4 **Q.** And Ms. Monroe responds, "Certainly." You see that?

5 **A.** Yep.

6 **Q.** And then does she go on to ask the question that he has
7 posed?

8 **A.** Yes.

9 **Q.** Let me show you what's page 206 in the transcript.

10 You see where Ms. Monroe asked Mr. Doe whether he has any
11 additional questions of this particular witness?

12 **A.** Yes.

13 **Q.** And he responds "No"?

14 **A.** That is correct.

15 **Q.** Let me show you what I think is page 156 or 157.

16 You see where Ms. Monroe, again, asks whether anyone has
17 additional questions?

18 **A.** Uh-huh.

19 **Q.** The respondent says, "It is kind of two parts," see that?

20 **A.** Yes.

21 **Q.** And do you see where Ms. Monroe then articulates a
22 question in response to Mr. Doe's request?

23 **A.** Yes.

24 **Q.** All right. We're near page 177 of the transcript.

25 You see where you have asked Mr. Doe whether he has any

1 questions at this particular time?

2 **A.** Yes.

3 **Q.** What's Mr. Doe's response?

4 **A.** "No."

5 **MS. HAMILL:** Your Honor, I don't mean to cut this
6 off. I would stipulate that's an accurate transcript. And he
7 can keep going through it, but I'm not going to object to that.

8 **THE COURT:** Counsel?

9 I get the point enough -- I mean, at some point enough is
10 enough. It is a quarter to six here.

11 **MR. LEICHTY:** I think we have made our point. We are
12 happy to tender the transcript to indicated that these
13 questions and opportunities were offered.

14 **THE COURT:** That was Exhibit 138?

15 **MR. LEICHTY:** Exhibit 138. We move for its
16 admission.

17 **THE COURT:** All right. It is admitted.

18 (Defendant's Exhibit No. 138, previously marked, was
19 admitted in evidence.)

20 **MS. PRUITT:** Your Honor, could we move to admit that
21 under seal since it is not redacted?

22 **THE COURT:** Sure.

23 **MR. LEICHTY:** Thank you.

24 **BY MR. LEICHTY:**

25 **Q.** Mr. Willerton, I understand that there were two witnesses

1 who could not participate in the administrative hearing, is
2 that right?

3 **A.** That's correct.

4 **Q.** What were the circumstances of those two witnesses?

5 **A.** One student declined to participate and then the other
6 student notified our office that he would be traveling and
7 unable to participate. He provided a statement, an affidavit,
8 through the administrative investigation, and that was
9 reviewed.

10 **Q.** Let's speak to the outcome that was reached by the three
11 individuals of this hearing panel with you. Why was the
12 particular outcome of dismissal with the option to reapply in
13 the spring semester reached in this particular case?

14 **A.** Sure. So there are two different factors here. One is we
15 have a course of conduct, we have a pattern of conduct,
16 including a student who's told the other individual this is
17 abusive, this is harassing. There were also not necessarily
18 just threats of violence. It is okay for an individual to have
19 suicidal ideation. It is okay to tell somebody, I feel like
20 killing myself. That's not a violation of our Standards of
21 Conduct. Where it crosses the line is where it says, And
22 people will think you are responsible for this, and this is
23 because of you, or I will kill myself if you don't contact me
24 in the next amount of time; that's where it crosses the line.

25 When we have to look at the difference between permanent

1 dismissal versus dismissal with the opportunity to apply for
2 readmission, it is, does the student understand the issues?
3 Can the student seek help? Is this egregious enough they are
4 not going to be a threat to our community?

5 And we determined that he wouldn't be a threat to our
6 community if he could get help and understand how these issues
7 do affect others, which he articulated; and that's something
8 that was provided through his counselor's letter. We looked at
9 that information just as we looked at other things. Although
10 we don't as a practice have counselors coming in to share
11 information in that witness role, we still considered the
12 information included there.

13 And we shared with Mr. Doe at the decision meeting -- I
14 shouldn't say we, I shared with him -- you are not permanently
15 dismissed, and the reason you weren't permanently dismissed is
16 because you recognize this is an issue. We want to get you
17 help. We want to position you for success, but this course of
18 conduct is very concerning and this course of conduct has no
19 place in this University community. So as we balance his
20 developmental and formative needs for him moving on,
21 graduating, great.

22 What we also have to balance that with is our expectations
23 for our community to say certain behaviors are not tolerated,
24 and there needs to be a response to that.

25 Q. Okay. I think the decision letter that you -- the panel

1 rendered has already been admitted. Let me jump to a subject
2 that was raised with you in initial questioning about Mr. Doe's
3 request to have supplemental information considered after that
4 decision has been rendered. You are aware that request was
5 made?

6 **A.** Yes, I remember that.

7 **Q.** There is a procedure at Notre Dame for that information to
8 be considered?

9 **A.** Yes, that's why we have the case review process.

10 **Q.** Okay. That's one of the options for the case review board
11 to consider the case if, in fact, there's new information that
12 becomes available?

13 **A.** Yep. The case review board would determine whether or not
14 that's substantive information; that's their responsibility.

15 **Q.** We're in federal court. We deal with deadlines all the
16 time. Can the University afford to continually put off, say,
17 the investigation period, what we would call discovery in
18 federal court, or put off, in fact, what we call in federal
19 court a trial or what you would call an administrative hearing,
20 or the judgment, what we call in federal court, what you would
21 call a decision letter, just so the parties can continue to add
22 more and more information to the case? Can that happen
23 feasibly in a university setting?

24 **A.** That's why we have deadlines, and that's why we
25 benchmarked and looked at what is an appropriate length of

1 time.

2 Q. And if there is new information that becomes available,
3 say, for the case review board, does a student have an
4 opportunity to present that?

5 A. Yes.

6 Q. Let's say it comes available sometime after -- or at least
7 the administrative investigation process related to it has not
8 been concluded, how does the University account for or evaluate
9 that information?

10 A. So anything related to that investigation phase before it
11 comes to us would all be under Heather Ryan's purview, and she
12 would make a determination of the length of an investigation,
13 how long it should take.

14 Q. And is that why we see, at least in this case, a second
15 investigation file related to allegations from both Ms. Roe and
16 Mr. Doe?

17 A. Yes. So at some point the case has to be forwarded to be
18 adjudicated, otherwise it would be a situation where we would
19 have continual, not never ending, but continual complaints back
20 and forth.

21 Q. There was some discussion about --

22 They are singing me off. It is like the Oscars here.

23 There's been some discussion about an OCR investigation.

24 Does that affect in any way what your office does in terms of
25 hearing these types of cases?

1 A. Absolutely not.

2 Q. Did it affect how you conducted the process or the process
3 you followed in this particular case?

4 A. No. I guess I would also qualify this by saying we have
5 OCR investigations, I'm aware of one specifically, and because
6 of that I'm under a heightened sense to ensure that we follow
7 these procedures and that we don't deviate and make exceptions
8 on both sides.

9 Q. Let me pose a scenario that addresses one that was given
10 to you a moment ago.

11 Suppose there are four policy violations found under *du*
12 *lac* and this goes up on case review and the case review panel
13 determines that one of those four maybe had new evidence that
14 indicated it shouldn't be found as a policy violation. If any
15 of those other three justify a dismissal, would the outcome be
16 any different?

17 A. The final outcome, no.

18 Q. In terms of this particular matter, I know there was, sort
19 of, a couple different times cross-complaints by Ms. Roe and
20 Mr. Doe about violations of the no contact order, right? You
21 are aware of that?

22 A. Uh-huh.

23 Q. Yes.

24 A. Yes.

25 Q. Were either one of them found to have violated a no

1 contact order?

2 A. No.

3 Q. Are you aware of at Notre Dame comparable situations in
4 which women as respondents have been dismissed?

5 A. Yes.

6 Q. Without getting too deep into the weeds, could you tell
7 the Court what scenarios you are aware of?

8 A. Yes. So there's two that I can think of. One involved a
9 dating violence case where we had a situation where one student
10 filed a report, the other person, through that investigation,
11 filed a countercomplaint. The investigation happened with both
12 of those about their conduct, and then the entire file was
13 forwarded to us. So for that administrative hearing, each
14 student was both roles, and both students were actually
15 dismissed from the University and offered the opportunity to
16 apply for readmission pending counseling and substance abuse
17 treatment.

18 Q. Were either of those students women?

19 A. Yes, one was. One was male, and one was female.

20 Q. Are you aware of any other incident where a female student
21 has been dismissed in this Title IX arena?

22 A. Yes. We had a female permanently dismissed from the
23 University.

24 Q. And did that involve a complaint by a man against a woman
25 or woman against woman?

1 A. That happened to be a woman against a woman in that case.

2 Q. Have there been situations at Notre Dame in the Title IX
3 arena in which male students who are respondents have been
4 found not responsible?

5 A. Yes.

6 Q. Does Notre Dame differentiate between men and women?

7 A. No.

8 Q. Does it differentiate between whether someone is from a
9 wealthy family or on student aid?

10 A. No.

11 Q. Does it differentiate between whether they are a student
12 athlete or not?

13 A. No.

14 Q. Does it differentiate between whether or not an individual
15 is a freshman or near graduating senior?

16 A. No.

17 MR. LEICHTY: One moment, Your Honor.

18 THE COURT: Sure.

19 BY MR. LEICHTY:

20 Q. Mr. Willerton, as part of the administrative hearing
21 process, the three-person panel considered a host of text
22 messages, correct?

23 A. That's correct.

24 Q. And we're not going to go through all those. It is late
25 on a Friday. We do want to submit them to the Court for

1 consideration. Those text messages didn't happen in any one
2 given day, did they?

3 **A.** No.

4 **Q.** What period of time did they occur?

5 **A.** I'd have to check the record, but roughly late summer
6 through Novemberish.

7 **Q.** Okay. So if we are talking about a snapshot versus a
8 motion picture, we have one particular concerning text message,
9 that's one snapshot or perhaps one incident, I suppose, right?

10 **A.** Correct.

11 **Q.** As we get the fuller picture of all these text messages
12 over time and the panel is considering the information before
13 it, does it allow witnesses to speak to the entire motion
14 picture that is this series of text messages?

15 **A.** Yes, they can speak to either the full or the individuals.

16 **Q.** Okay. In this particular case, did that happen?

17 **A.** I believe there was clarification that they both provided
18 from what I recall.

19 **Q.** And with respect to witnesses who could speak to the
20 relationship between Mr. Doe and Ms. Roe that surrounded this
21 motion picture that were the text messages, did the
22 three-person hearing panel consider witness testimony related
23 to that?

24 **A.** So we actually reviewed all the documents to determine
25 does this have weight? Does this -- is this related to these

1 text messages between two individuals?

2 Q. I realize we are not a federal criminal court here at the
3 University of Notre Dame as we conduct these things, but you
4 mentioned the importance of deadlines. Does OCR have an either
5 recommendation or guideline as to when the process needs to be
6 complete?

7 A. So they have a recommendation of 60 days from the date
8 that the report is made through the date a decision is
9 communicated.

10 Q. Okay. And is that a guideline that Notre Dame has adopted
11 in *du lac*?

12 A. Yes.

13 Q. Is that a guideline that Notre Dame tries to achieve?

14 A. That's our goal.

15 MR. LEICHTY: That's all I have, Your Honor, at this
16 moment.

17 THE COURT: Thank you. Very briefly.

18 MS. HAMILL: I will be very brief, Your Honor.

19 REDIRECT EXAMINATION

20 BY MS. HAMILL:

21 Q. Mr. Willerton, you gave an example of statistics. I'm a
22 little bit at a disadvantage because I don't have the full
23 picture here, but I'm going to ask you a couple questions. You
24 mentioned two instances. One involved two women, the other
25 involved a man and a woman together. Right?

1 A. That's correct.

2 Q. Was there ever an instance where there was a man who
3 complained about a woman and the woman was dismissed but not
4 the man?

5 A. Excuse me. So a woman complained about a man and the
6 woman is dismissed?

7 Q. No. I'm trying to drive at -- the two examples you
8 gave -- when it was the heterosexual example both of them got
9 dismissed.

10 A. Sure.

11 Q. The other one was between two women. So I'm asking you if
12 you had any other examples where it was a man and a woman --
13 I'm getting --

14 THE COURT: What she's trying to ask you is, do you
15 have any incidents in where you had a male complainant against
16 a woman and the woman was dismissed from school?

17 THE WITNESS: I can't think of one off the top of my
18 head.

19 THE COURT: Stalking or harassment or sexual violence
20 or anything?

21 THE WITNESS: Not that I can think of off the top of
22 my head.

23 MS. HAMILL: Thank you.

24 BY MS. HAMILL:

25 Q. You talked about the 60-day guideline. It is a guideline.

1 We talked earlier about Mr. Doe's February 3 complaint,
2 official complaint to Heather Ryan, about Ms. Roe's harassing
3 behavior in reporting these no contacts. That official
4 complaint hasn't been addressed yet, right, we are 60 days
5 beyond that?

6 **A.** Correct.

7 **Q.** You indicated earlier in your testimony that if it were a
8 part of the administrative regard that got handed off to you
9 that you would have -- it would have been part of the record
10 that you reviewed in your office, correct?

11 **A.** So if the administrative investigation report was
12 forwarded to our office indicating we have complainants,
13 respondents, we would have addressed it.

14 **Q.** And I want to show you what I'm going to mark as
15 Plaintiff's Exhibit 16.

16 This is Ms. Ryan responding on February 9 to -- regarding
17 this complaint that Mr. Doe has made and indicating to Mr. Doe,
18 "Also your allegation that Student A violated the no contact
19 order on 1/31/17 was included with the information that was
20 submitted to the Office of Community Standards." Do you see
21 that, sir?

22 **A.** Yeah, I do see it.

23 **Q.** So that was part of the record that was in your office,
24 correct?

25 **A.** Based on this e-mail, I would assume so.

1 Q. It could have been addressed on February 24th, correct?

2 A. It could have been.

3 Q. I'm going to show you what's been marked as Plaintiff's
4 Exhibit --

5 Mr. Willerton, I'm going to show you what's been marked as
6 Plaintiff's Exhibit 14. It is the affidavit of Jane Roe in
7 connection with her production of a fuller set of text messages
8 she made to us yesterday. Do you see that, sir?

9 A. Yes.

10 Q. And in particular I want to draw your attention to
11 paragraph 6, 7, and 8 where she indicates that "The groups of
12 texts that I have produced in response to the subpoena in this
13 contains more texts than what was produced in response to the
14 processing of the Title IX matter by the University of
15 Notre Dame and that the University of Notre Dame did not
16 request the full extent of texts," correct?

17 A. Yes.

18 Q. That's an accurate statement, isn't it?

19 A. That's correct.

20 Q. And then finally I want to show you -- well, not finally,
21 but in terms of an exhibit, Plaintiff's Exhibit 16, and this is
22 from the texts that were produced by --

23 **MR. GALLINARO:** Seventeen.

24 **MS. HAMILL:** Sorry about that.

25 **THE COURT:** That's okay.

1 **BY MS. HAMILL:**

2 **Q.** Plaintiff's Exhibit 17, and this is an extract, and it's
3 going to have to be under seal. It was produced as part of a
4 very large set of documents that we got from Jane Roe
5 yesterday, her fuller text history. And I just have one
6 question for you, and I just wanted to get an example before
7 the Court of the larger context here.

8 This is a text exchange around October 13th of 2016.
9 Are you aware as well around this time that Ms. Roe was
10 making -- had gone to meet with Ms. Ryan on October 14th to
11 talk about the possibility that there were -- that she was
12 being harassed through this text messaging, are you aware of
13 that?

14 **A.** I wasn't -- I don't recall a meeting October 14th with
15 Heather Ryan.

16 **Q.** I'm going to show you Ms. Ryan's affidavit which was put
17 in in this case, and it is paragraph 13. I think it is
18 Ms. Ryan's. Yes, it is.

19 **A.** Okay.

20 **Q.** "On October 14th, I met with Ms. Roe. At that time,
21 Ms. Roe reported certain incidents involving Mr. Doe." Purpose
22 of my question in showing you these text messages is, if you
23 look through this exchange, it is a conversation between
24 Mr. Doe and Ms. Roe where Ms. Roe is working with and
25 communicating with Mr. Doe about how they can continue to keep

1 communicating even though her mom is complaining to the school
2 and thinks she has Stockholm syndrome. Do you see that in the
3 text messaging?

4 **A.** Yes, I see that there.

5 **Q.** Okay. So isn't it true that given that this was a
6 relationship case that -- and you have talked about, you know,
7 witnesses to incidents and whatnot, but context really does
8 matter, doesn't it, sir?

9 **A.** To an extent, yes.

10 **Q.** Isn't it true that Mr. Doe was not allowed to have
11 witnesses testify about some aspects of his relationship with
12 Ms. Roe, including her prior threats of suicide? He was shut
13 down at the hearing, wasn't he?

14 **A.** I don't recall that; but if a question was raised about
15 her behavior and was she suicidal, likely we would not have
16 explored that because the purpose of this administrative
17 hearing was about his behavior, so that's certainly possible.

18 **Q.** And the same would have been if he tried to have a witness
19 testify about her previously claiming that he was stalking her
20 when, in fact, there was evidence that he wasn't, correct?

21 **A.** Could you please repeat that.

22 **Q.** If one of his -- you may recall this. But if any of his
23 witnesses tried to testify about a prior time on a spring break
24 trip where Ms. Roe was claiming that Mr. Doe was stalking her
25 when, in fact, there was evidence from others, other students

1 who observed this that that wasn't the case, they weren't
2 allowed to give that testimony, correct?

3 **A.** My understanding from the spring break -- from the
4 administrative hearing when we discussed spring break, it was
5 concerns he had about her behavior. I believe that would be in
6 the transcript; that was my understanding of it.

7 **Q.** Right. So he wouldn't have been allowed to ask questions
8 about that, right?

9 **A.** That's correct.

10 **Q.** And weren't witnesses, at least one witness, weren't they
11 allowed to testify about a night in a bar in New York City over
12 the summer when supposedly Mr. Doe turned over a table at a
13 bar? Weren't they allowed to testify to that?

14 **A.** Yes, and it was some of his witnesses too, I believe.

15 **Q.** And that's not a witness to the incident of these text
16 messages that you have been talking about, is it?

17 **A.** No, but it was an incident that happened at a bar where he
18 was allegedly violent that we didn't find him responsible for;
19 but it was an incident that happened between the two of them.
20 And we didn't have enough information to say, was he violent?

21 Did he flip a table? Did he engage in other behavior? And
22 that's why there was no finding.

23 **Q.** But you allowed testimony about that, which was really
24 designed to show that he had a violent temper, correct?

25 **A.** No. I disagree with that.

1 Q. Isn't that character evidence?

2 A. No, I disagree with that too. What we had to do, if I
3 may --

4 Q. You can say you disagree.

5 THE COURT: Let her ask another question.

6 THE WITNESS: I apologize.

7 THE COURT: I'm going to give you five more minutes.

8 MS. HAMILL: I only need one.

9 BY MS. HAMILL:

10 Q. Mr. Willerton, I just want to confirm that the text
11 messages that I was showing you in Exhibit 17, you haven't seen
12 them before today, correct?

13 A. To be honest, I have no idea. I don't recognize them by
14 seeing them, but there were a lot of text messages.

15 MS. HAMILL: Thank you.

16 THE COURT: The ones you saw were the ones she
17 provided to you?

18 THE WITNESS: That is correct.

19 THE COURT: That was her decision?

20 THE WITNESS: That is correct.

21 MS. HAMILL: That's all, Your Honor. Thank you.

22 THE WITNESS: Thank you.

23 MR. LEICHTY: One question, Your Honor.

24 \\\

25 \\\

1 **MR. LEICHTY:** No objection.

2 (Plaintiff's Exhibit No. 14, previously marked, was
3 admitted in evidence.)

4 **MS. HAMILL:** Exhibit 16, which is the February 9
5 communication from Heather Ryan regarding putting the no
6 contact violation into the administrative file.

7 **MR. LEICHTY:** No objection.

8 **THE COURT:** That's admitted.

9 (Plaintiff's Exhibit No. 16, previously marked, was
10 admitted in evidence.)

11 **MS. HAMILL:** I think that was it.

12 **THE COURT:** Okay, sir, you may step down. Thank you.

13 **THE WITNESS:** Thank you.

14 **THE COURT:** So do you have any additional witnesses?

15 **MS. HAMILL:** No, Your Honor.

16 **THE COURT:** All right. Do you have any additional
17 witnesses beyond the two we just heard?

18 **MR. LEICHTY:** Your Honor, no, other than I would
19 call, again, Mr. Doe; but I'm willing to offer a stipulation
20 which if we can submit the text messages that are part of the
21 record rather than going through them with Mr. Doe.

22 **THE COURT:** I mean, I don't see that being necessary.
23 These are essentially the ones that are detailed in the
24 decision letter, correct?

25 **MR. LEICHTY:** There are a few additional ones as

1 well.

2 **THE COURT:** Okay.

3 **MR. LEICHTY:** And rather than, you know, belabor this
4 with the Court and everyone's times, I'm happy to --

5 **THE COURT:** Do you have them marked?

6 **MR. LEICHTY:** I have them marked as exhibits.

7 **THE COURT:** Do you have any objection?

8 **MS. HAMILL:** I'd have to look at them, but, in
9 general, I don't have a problem with the concept.

10 These are from the production that was yesterday?

11 **MR. LEICHTY:** These are all Bates numbered.

12 **MS. HAMILL:** The only thing I would want is an
13 opportunity -- we haven't gotten through everything. I have no
14 objection to you putting those in the record if we have an
15 opportunity -- and I realize you need to make a decision
16 quickly -- but to be able to see what they have done and if we
17 have any other designations.

18 **MR. LEICHTY:** I have no objection to that.

19 **THE COURT:** Okay. Why don't we do this. I'm going
20 to give you to the end of the day Tuesday to supplement the
21 record based upon what they are offering now by way of these
22 additional text messages because I know you are in the process
23 of going through these now.

24 Does that give you enough time to do that?

25 **MS. HAMILL:** That would be fine, Your Honor.

1 The only other -- the only other, and it is for Your
2 Honor's convenience, this record is, obviously, rather
3 complicated and everything. I personally would be willing to
4 also get you, with a page limit, but here is 10 pages of, you
5 know, what we got in the record and why it is relevant to what
6 we have requested here today and for --

7 **THE COURT:** Well, that's super helpful for me but,
8 you know, Mr. Leichty, do you have an opinion on that? If I
9 asked -- give you all until, I don't know, the end of the day
10 Tuesday to file no more than 10-page brief that -- simultaneous
11 filing as, sort of, a closing argument as it were --

12 **MR. LEICHTY:** That's fine with us, Your Honor.

13 **THE COURT:** -- to what I heard today?

14 **MR. LEICHTY:** That's fine.

15 **THE COURT:** Does that seem like a reasonable
16 approach?

17 **MR. LEICHTY:** Your Honor, one other closing matter.
18 We do have two affidavits of Ms. Roe that we would also like to
19 submit for Your Honor's consideration.

20 **THE COURT:** Different from the ones we have already
21 admitted?

22 **MR. LEICHTY:** It is. One of the affidavits concerns
23 the video we watched with the witness that spoke about
24 videotaping the two girls.

25 **THE COURT:** Okay.

1 **MR. LEICHTY:** It is Ms. Roe's recollection as to whom
2 she was talking about during that video, and the second
3 affidavit is authenticating the conversation that she's had
4 with another woman involved with Mr. Doe and similar behavior
5 to what we see here in these text messages in terms of from our
6 perspective, our argument, threatening suicide to get her to
7 do.

8 **THE COURT:** I tell you, I have a real problem with
9 that. That strikes me as pretty collateral to this and really
10 is character evidence in the true sense of the term. So I'm
11 not going to allow you to offer that second affidavit. I know
12 you have a problem with that first affidavit.

13 **MS. HAMILL:** I do, Your Honor.

14 **THE COURT:** But I'm going to accept it, and I'm going
15 to take it for what it is worth because I know I haven't had an
16 opportunity to evaluate her, so I'm going to accept it into the
17 record and treat it in the manner in which it is offered.

18 **MS. NEMETH:** We haven't seen it yet.

19 **MS. HAMILL:** We haven't seen it.

20 **THE COURT:** I'll tell them to hand it to you right
21 now.

22 **MR. LEICHTY:** It is three paragraphs. It is
23 particularly important.

24 **THE COURT:** It is, essentially, she's going to say,
25 gee, I think I was talking about the other accused, the other

1 assaulter.

2 MS. HAMILL: Yeah.

3 THE COURT: That's essentially what it says?

4 MR. LEICHTY: That is. I think it is particularly
5 important given the witness's testimony today he wasn't sure
6 which one it was.

7 THE COURT: Okay.

8 MS. HAMILL: I don't want this to turn into, okay,
9 now we'll go get three other -- I know you are taking it in the
10 spirit in which it is offered.

11 THE COURT: I have heard from the live witness here.
12 I am going to have the ability to evaluate the credibility. I
13 am not going to have the ability to evaluate her credibility,
14 so that's the manner in which it is being received. And so
15 with those, sort of, parameters, I'm going to accept the
16 affidavit.

17 MS. HAMILL: Objection. But I --

18 THE COURT: Understood. It is overruled. I will
19 accept it. What is the exhibit number of that?

20 MR. LEICHTY: That is Exhibit 141. We have not
21 redacted it. I would offer that under seal.

22 THE COURT: That will be admitted.

23 (Defendant's Exhibit No. 141, previously marked, was
24 admitted in evidence.)

25 THE COURT: And so those other text messages, do you

1 have them labeled?

2 **MR. LEICHTY:** I do, Your Honor, and maybe just for
3 the record while we are together, I'll read these out. And I'm
4 sorry I don't have these in chronological order because they
5 are thematic. Exhibit 131, Exhibit 146, 147, 148, 149, 143,
6 124, 150, 125, 127, 128, 129, 130.

7 **THE COURT:** Okay. So those are additional text
8 messages from John Doe to the accuser in this case?

9 **MR. LEICHTY:** These are text messages between Mr. Doe
10 and Ms. Roe.

11 **THE COURT:** So I'm going to enter those into evidence
12 and give the opportunity to supplement the record with
13 additional text messages that you culled from from Jane Roe's
14 production and, again, ask you to do that at the time you
15 submit your brief by the end of the day Tuesday.

16 **MS. HAMILL:** That's fine, Your Honor.

17 **THE COURT:** Okay.

18 **MS. HAMILL:** Yes.

19 (Defendant's Exhibit No. 131, 146, 147, 148, 149, 143,
20 124, 150, 125, 127, 128, 129, 130, previously marked, were
21 admitted in evidence.)

22 **THE COURT:** Everything that's been admitted into
23 evidence, I want it up on this table here so that I know, you
24 know, what I have in front of me so that I can fully consider
25 this matter when we sit down and write this thing, okay.

1 **MR. LEICHTY:** Thank you, Your Honor.

2 **MS. HAMILL:** Thank you, Your Honor.

3 **THE COURT:** So anything else that we need to talk
4 about then?

5 **MR. LEICHTY:** Not on our end, Your Honor.

6 **MS. HAMILL:** I don't think so, Your Honor.

7 **THE COURT:** I appreciate it. I know this has been
8 very taxing. It is taxing for the Court too.

9 **MR. LEICHTY:** We appreciate it.

10 **MR. GALLINARO:** We appreciate your time.

11 **MS. HAMILL:** Thank you, Your Honor.

12 **THE COURT:** I think it is a good idea what Denise is
13 suggesting. I'm just going to seal all of the exhibits at this
14 point because we're all operating on the fly here, and then we
15 can clean them up later and unseal and have them redacted
16 appropriately. It is probably just a safer way to approach
17 this.

18 Does anybody have any objection to that?

19 **MS. HAMILL:** None. Your Honor, we didn't move in,
20 but we should have, the video that -- the two video clips and
21 that's -- so we have to get those in the record.

22 **THE COURT:** Yes, I would like to have them e-mailed
23 to my chambers. Because quite frankly when you played it, it
24 was so abrupt that I wasn't even oriented. I think I got the
25 gist of it but not completely; so I would like an opportunity

1 to review it again. I think a lot of us had the same reaction.
2 We were like, oh, geez, what did we just hear? You know what I
3 mean?

4 **MS. HAMILL:** Right.

5 **THE COURT:** It would be helpful if you sent the clip
6 in the form of an e-mail to chambers.

7 Do you have any objection to that?

8 **MR. LEICHTY:** No, Your Honor.

9 **THE COURT:** We'll supplement the record with maybe a
10 thumb drive or however you want to actually introduce it, okay?

11 **MS. HAMILL:** And if for any reason, given we are on
12 the fly and didn't move something into the record, we'll work
13 with you to --

14 **MR. LEICHTY:** Absolutely.

15 **MS. HAMILL:** -- work out a stipulation.

16 **MR. LEICHTY:** Absolutely.

17 **MS. HAMILL:** Thank you.

18 **THE COURT:** I'll get something out to you as quickly
19 as I can. As I'm looking at it, my -- the goal would be to get
20 something out to you by no later than, you know, May 8th or
21 May 9th so that it would give you a couple of extra days
22 towards the end of the exam week if I agree with the plaintiffs
23 here to allow him to take his exams. That's about the best I'm
24 going to do because I'm in trial all next week on a super
25 complicated case, so I'm busy. So I'm going to do the best I

1 can here.

2 **MS. HAMILL:** Understood.

3 **THE COURT:** We will have something out to you by no
4 later than let me say Tuesday of that following week, okay.

5 **MS. HAMILL:** Thank you, Your Honor.

6 **THE COURT:** All right. Thanks, guys. Again, make
7 sure all the exhibits are left here so we have them.

8 (A recess was had at 6:20 p.m.)

9 * * *

10 (End of requested transcript.)

11 **CERTIFICATE**

12 I, Stacy L. Drohosky, certify that the foregoing is a true
13 and correct transcript from the record of proceedings in the
14 above-entitled matter.

15 Date:

16 S/Stacy L. Drohosky
17 S/STACY L. DROHOSKY
18 Court Reporter
19 U.S. District Court
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF WITNESSES

Page

STUDENT 1

Direct Examination by Mr. Gallinaro 44
Cross-Examination by Mr. Leichty 52
Redirect Examination by Mr. Gallinaro 59

STUDENT 2

Direct Examination by Mr. Gallinaro 61
Cross-Examination by Mr. Leichty 67

HEATHER RYAN

Direct Examination by Mr. Agostino 69
Cross-Examination by Mr. Leichty 136
Redirect Examination by Mr. Agostino 187
Recross-Examination by Mr. Leichty 198

RYAN WILLERTON

Direct Examination by Ms. Hamill 200
Cross-Examination by Mr. Leichty 278
Redirect Examination by Ms. Hamill 312
Recross-Examination by Mr. Leichty 320

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF EXHIBITS RECEIVED IN EVIDENCE

FOR THE PLAINTIFF:

Exhibit No. 1	278
Exhibit No. 2	278
Exhibit No. 4	278
Exhibit No. 5	278
Exhibit No. 7	278
Exhibit No. 8	278
Exhibit No. 9	278
Exhibit No. 10	278
Exhibit No. 12	278
Exhibit No. 13	278
Exhibit No. 14	321
Exhibit No. 15	278
Exhibit No. 16	332
Exhibit No. 17	320
Exhibit No. 20-46	132
Exhibit No. 47	278
Exhibit No. 48-55	135

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF EXHIBITS RECEIVED IN EVIDENCE

FOR THE DEFENDANT:

Exhibit No. 100	281
Exhibit No. 101	146
Exhibit No. 103	289
Exhibit No. 104	155
Exhibit No. 107	147
Exhibit No. 111	172
Exhibit No. 115	164
Exhibit No. 116	165
Exhibit No. 118	171
Exhibit No. 119	163
Exhibit No. 123	177
Exhibit No. 124-125	326
Exhibit No. 127-129	326
Exhibit No. 130	326
Exhibit No. 131	326
Exhibit No. 132	172
Exhibit No. 138	303
Exhibit No. 141	325
Exhibit No. 143	326
Exhibit No. 146-150	326

BY MR. AGOSTINO: [29] 69/21 70/6
71/13 76/11 85/23 88/19 91/20 92/6
94/19 97/17 104/1 104/15 105/6 105/16
106/7 107/15 109/22 116/22 117/12
120/21 121/9 124/22 125/12 127/12
128/6 131/15 187/5 188/13 191/6
BY MR. GALLINARO: [9] 44/19 45/8
47/14 51/7 59/1 61/12 61/25 64/8 65/11
BY MR. LEICHTY: [34] 52/7 67/8
136/1 140/14 144/11 146/23 147/9
147/20 151/22 155/14 162/5 162/10
163/16 164/17 165/5 170/11 172/18
173/9 174/10 175/4 177/9 178/17 184/5
185/11 198/14 278/15 281/18 284/3
289/20 297/23 301/22 303/23 310/18
320/1
BY MS. HAMILL: [17] 200/20 208/6
213/3 218/12 221/8 228/4 234/9 241/8
247/7 250/11 252/13 272/6 275/12
312/19 313/23 315/25 319/8
BY THE WITNESS: [3] 65/23 201/18
227/22
DEPUTY CLERK: [4] 44/3 69/7 133/2
200/6
MR. AGOSTINO: [43] 2/22 69/10 70/5
82/25 85/21 89/4 92/4 103/21 104/12
106/6 107/13 116/17 116/21 125/7
125/11 127/10 128/5 131/11 132/1
132/13 133/7 133/12 133/19 134/13
134/20 135/2 135/5 135/7 135/22
146/19 147/16 151/13 155/9 163/12
171/3 171/16 171/25 174/6 177/5 187/1
188/9 198/7 198/9
MR. GALLINARO: [19] 2/20 44/6 45/5
45/7 47/12 48/7 50/21 50/23 60/7 61/10
63/24 65/2 65/6 65/8 66/19 68/9 252/11
315/22 327/9
MR. LAHEY: [1] 2/17
MR. LEICHTY: [112] 2/12 7/9 8/3 8/5
8/17 8/21 8/23 9/12 9/16 9/19 11/1
25/15 26/6 26/23 31/8 31/19 31/22
31/25 32/23 35/10 35/25 36/7 36/12
36/21 37/1 39/8 39/21 45/3 52/5 59/24
60/9 60/14 60/20 61/2 68/7 68/18
116/10 116/16 116/18 131/24 132/6
132/19 133/23 134/3 134/8 135/17
140/9 140/12 146/16 147/7 147/13
151/20 155/5 162/9 163/9 164/9 164/13
164/24 169/8 169/10 170/25 171/10
171/13 171/17 171/21 171/23 174/3
175/1 177/2 186/12 186/24 198/11
199/22 227/18 274/16 275/7 278/1
278/13 281/12 289/10 303/10 303/14
303/22 310/16 312/14 319/22 320/6
320/18 320/25 321/6 321/17 321/24
322/2 322/5 322/10 322/17 323/11
323/13 323/16 323/21 323/25 324/21
325/3 325/19 326/1 326/8 326/25 327/4
327/8 328/7 328/13 328/15
MS. HAMILL: [111] 2/18 3/12 3/16
6/25 9/22 10/2 10/7 10/18 11/5 11/10
11/17 11/23 12/3 12/5 12/10 12/22 13/1
13/5 13/9 13/16 13/19 13/22 13/25 14/7
14/10 14/13 14/25 15/6 15/25 17/15
18/1 18/4 18/16 19/11 19/13 19/15
20/24 21/8 22/23 23/3 23/24 24/1 24/5
24/9 25/10 25/12 39/24 40/1 41/1 41/5
43/19 60/24 68/22 68/25 69/3 121/7
200/9 208/5 221/7 231/23 241/6 252/9

252/12 272/3 273/16 273/24 274/5
274/7 274/13 274/24 277/20 278/6
278/9 280/14 281/1 289/15 303/4
312/17 313/22 315/23 319/7 319/14
319/20 320/7 320/9 320/12 320/15
320/22 321/3 321/10 321/14 322/7
322/11 322/24 324/12 324/18 325/1
325/7 325/16 326/15 326/17 327/1
327/5 327/10 327/18 328/3 328/10
328/14 328/16 329/1 329/4
MS. NEMETH: [2] 2/24 324/17
MS. PRUITT: [5] 2/15 169/9 171/8
171/22 303/19
THE COURT: [393]
THE MARSHAL: [1] 43/22
THE REPORTER: [1] 201/15
THE WITNESS: [125] 44/15 46/16
46/20 46/22 46/24 47/2 47/4 48/10
48/17 48/20 49/4 49/8 49/11 49/17 50/2
50/13 50/18 60/5 60/11 60/17 60/19
61/6 61/23 64/2 64/4 64/6 66/24 67/3
68/12 69/16 70/4 71/9 71/12 75/2 75/10
83/2 83/5 83/9 83/13 83/15 83/19 83/24
84/2 84/6 84/9 84/11 85/8 85/18 88/17
89/7 89/11 89/21 90/3 90/18 91/10
91/19 94/16 94/18 104/13 105/5 109/21
117/5 120/19 121/8 124/21 127/11
129/23 129/25 130/24 131/2 131/7
143/24 144/3 144/7 144/10 169/14
169/17 169/20 170/1 170/4 170/9 172/6
172/8 172/12 172/14 173/5 178/8
178/11 184/2 185/2 186/21 188/12
191/2 200/13 200/15 200/17 201/17
212/3 218/10 221/4 221/6 232/12
232/16 232/18 233/12 233/14 247/4
247/6 250/7 271/17 271/20 272/1 272/5
296/17 296/22 297/7 297/22 301/8
313/16 313/20 319/5 319/17 319/19
319/21 321/12
'
cause [8] 80/3 82/4 95/7 98/23 106/1
242/23 259/5 272/11
1
1/31/17 [1] 314/19
10 [13] 12/21 126/12 187/17 187/18
200/2 254/24 274/6 278/4 293/23
293/25 298/25 323/4 331/11
10 percent [1] 90/1
10-minute [1] 200/1
10-page [1] 323/10
100 [6] 1/20 83/11 280/22 281/13
281/17 332/4
100 percent [1] 220/16
101 [4] 145/3 146/18 146/22 332/5
103 [5] 288/20 289/12 289/17 289/19
332/6
104 [6] 151/9 151/25 155/7 155/12
155/13 332/7
105 [2] 285/13 291/11
107 [7] 147/15 147/19 156/18 158/3
285/11 296/3 332/8
10:25 [1] 69/5
10:28 a.m [1] 5/1
10:41 [1] 69/7
11 [2] 160/19 223/21
11/29 [1] 172/8
111 [5] 171/23 171/24 172/2 172/3
332/9

115 [5] 163/19 163/22 164/11 164/16
332/10
116 [5] 164/19 164/25 165/1 165/4
332/11
1171 [1] 1/21
118 [5] 165/7 171/2 171/6 207/7 332/12
119 [5] 162/2 162/13 163/11 163/15
332/13
11:30 [2] 3/23 289/4
11:59 p.m [1] 291/3
11B [2] 295/15 296/8
12 [10] 36/14 42/12 54/25 83/8 252/7
252/8 252/23 252/23 278/4 331/12
121 [4] 140/11 195/6 195/7 275/15
123 [10] 175/6 175/14 175/23 177/4
177/7 177/8 177/13 179/11 179/18
332/14
124 [2] 326/6 326/20
124-125 [1] 332/15
125 [3] 326/6 326/20 332/15
127 [2] 326/6 326/20
127-129 [1] 332/16
128 [2] 326/6 326/20
129 [3] 326/6 326/20 332/16
12:15 [1] 194/4
12:20 [1] 132/25
12:46 a.m [1] 4/6
12th [6] 11/12 11/17 36/9 45/25 263/18
264/4
13 [8] 97/10 218/14 253/6 275/19 278/4
285/21 316/17 331/13
130 [3] 326/6 326/20 332/17
131 [4] 1/16 326/5 326/19 332/18
132 [7] 173/12 173/14 174/5 174/8
174/9 331/18 332/19
135 [1] 331/20
136 [1] 330/10
138 [5] 300/2 303/14 303/15 303/18
332/20
13th [11] 181/13 194/11 207/25 213/7
215/24 263/20 275/20 275/25 276/4
285/2 316/8
14 [9] 42/12 152/12 153/3 153/23 278/5
315/6 320/23 321/2 331/14
14-year-old [1] 225/25
141 [3] 325/20 325/23 332/21
143 [3] 326/5 326/19 332/22
146 [3] 326/5 326/19 332/5
146-150 [1] 332/23
147 [3] 326/5 326/19 332/8
148 [2] 326/5 326/19
149 [2] 326/5 326/19
14th [7] 94/22 182/1 194/12 194/13
316/10 316/14 316/20
15 [8] 125/9 246/11 276/7 276/8 278/5
298/19 298/25 331/15
15-minute [1] 68/17
15-month [1] 32/18
150 [3] 326/6 326/20 332/23
1500 [1] 1/12
1510 [1] 1/17
155 [1] 332/7
156 [1] 302/15
157 [1] 302/15
15th [1] 11/12
16 [7] 278/5 282/18 314/15 315/21
321/4 321/9 331/16
16-page [3] 214/14 214/19 214/19
163 [1] 332/13
164 [1] 332/10

1
165 [1] 332/11
166 [1] 22/23
17 [9] 43/13 278/5 314/19 316/2 319/11
320/10 320/17 320/21 331/17
171 [1] 332/12
172 [2] 332/9 332/19
177 [2] 302/24 332/14
17th [1] 182/3
18 [4] 73/5 83/5 201/7 201/9
18-month [1] 32/17
183 [1] 299/25
187 [1] 330/10
18th [2] 182/8 182/21
19 [2] 201/9 201/9
19102 [1] 1/13
194 [1] 301/24
198 [1] 330/11
199 [1] 197/14
1996 [1] 279/1
1998 [3] 201/13 201/20 279/2
19th [2] 182/9 182/23
1:15 [1] 132/22
1:22 [1] 133/2
1st [1] 1/20

2
2 p.m [1] 194/5
20 [12] 49/6 49/19 91/23 96/9 132/5
132/8 132/10 135/11 219/4 219/6
243/25 298/19
20-46 [1] 331/18
20-year-olds [1] 90/15
200 [1] 330/13
2000 [1] 4/8
2001 [2] 201/20 201/21
2003 [2] 201/21 201/24
2008 [1] 137/10
2010 [1] 109/13
2011 [3] 26/8 109/14 126/16
2012 [4] 201/6 201/6 201/25 202/6
2013 [2] 21/17 61/20
2015 [3] 61/22 138/8 185/4
2016 [23] 22/25 23/5 23/5 62/10 76/10
77/7 97/10 105/13 134/23 150/10
152/12 153/3 153/23 165/16 168/13
198/24 206/18 207/5 207/7 227/13
275/18 276/9 316/8
2017 [14] 1/6 24/17 36/9 95/15 105/14
126/21 135/12 135/14 179/11 179/18
180/1 243/25 253/6 275/25

2018 [1] 18/12
2035 [1] 95/5
2036 [1] 95/5
206 [1] 302/9
20th [10] 11/13 180/5 220/12 221/25
222/2 222/3 243/22 245/19 290/7
290/16
21 [4] 95/1 95/23 195/6 261/14
21-year-olds [1] 90/15
215 [1] 1/13
22 [3] 95/12 95/24 289/2
23 [2] 97/7 276/9
233-1171 [1] 1/21
23rd [1] 276/18
24 [3] 100/23 165/21 290/4
24/7 [1] 166/3
24th [6] 65/25 245/17 257/23 259/19
263/14 315/1
25 [1] 102/11

25th [1] 223/19
26 [5] 104/3 105/8 117/21 135/14 285/5
27 [3] 105/19 158/3 253/6
278 [13] 330/13 331/4 331/5 331/6
331/7 331/8 331/9 331/10 331/11
331/12 331/13 331/15 331/19
27th [6] 141/23 179/7 179/8 180/4
213/6 252/4
28 [7] 1/6 23/4 106/18 107/14 158/15
188/5 188/15
281 [1] 332/4
288-1510 [1] 1/17
289 [1] 332/6
28th [1] 142/4
29 [13] 107/17 134/23 160/19 165/16
168/13 172/8 195/8 198/24 207/7
275/18 276/1 295/15 296/6
298 [2] 1/4 2/4
29th [7] 172/7 172/7 173/6 194/6
197/20 197/25 208/11
2:53 [1] 200/4

3
30 [14] 49/6 49/20 54/24 55/4 55/12
55/18 56/12 56/17 105/13 108/9 135/10
157/3 187/14 232/6
300 [1] 105/9
300 feet [2] 103/15 104/23
303 [1] 332/20
30th [1] 106/3
31 [3] 43/10 110/2 111/7
312 [1] 330/14
31st [1] 197/18
32 [3] 110/24 111/6 285/5
320 [2] 330/14 331/17
321 [1] 331/14
325 [1] 332/21
326 [6] 332/15 332/16 332/17 332/18
332/22 332/23
33 [1] 111/15
332 [1] 331/16
34 [1] 112/5
35 [2] 112/16 249/7
36 [1] 113/15
37 [1] 114/1
38 [1] 115/17
39 [1] 116/24
3900 [1] 1/12
3:10 [1] 200/6
3:17-CV-298 [2] 1/4 2/4
3:30 [1] 299/13

4
4-day [2] 12/2 138/7
40 [1] 119/12
41 [1] 120/2
42 [1] 120/23
43 [2] 121/11 123/3
44 [2] 123/12 330/4
45 [3] 9/18 59/6 128/2
46 [6] 128/20 129/4 132/5 132/9 132/10
331/18
46601 [2] 1/16 1/21
47 [9] 131/17 133/9 133/12 134/10
134/12 197/14 260/12 278/5 331/19
48 [2] 134/15 135/19
48-55 [2] 135/21 331/20
4:35 [1] 153/23
4:39 p.m [1] 3/22
4:58 [1] 274/1

5
500 [1] 267/18
51 [1] 135/1
52 [3] 135/5 135/8 330/4
55 [6] 132/24 134/15 135/13 135/20
135/21 331/20
57 [1] 135/2
574 [2] 1/17 1/21
59 [1] 330/5
5:06 [1] 274/3
5th [2] 36/9 209/4

6
6 p.m [1] 194/5
60 [3] 258/21 312/7 314/4
60-day [2] 43/16 313/25
61 [1] 330/7
634 [1] 26/5
634 F.3d [1] 26/8
67 [1] 330/7
69 [1] 330/9
6:20 [1] 329/8

7
700 [1] 1/20
747 [1] 104/5
748 [2] 104/5 104/6
749 [3] 104/5 105/2 105/8

8
8083 [1] 1/13
864-8083 [1] 1/13
883 [2] 26/5 26/8
8:30 [5] 7/18 8/1 8/25 9/5 9/10
8A [1] 160/10
8th [6] 11/5 11/15 121/9 241/12 243/21
328/20

9
90 percent [2] 89/23 197/9
9:30 [4] 5/25 8/14 10/7 14/4
9:37 [1] 44/1
9:52 [1] 44/3
9th [2] 241/5 328/21

A
a.m [6] 4/6 5/1 44/1 44/3 69/5 69/7
A1 [1] 197/14
AA [1] 212/18
ability [15] 22/5 64/23 99/13 190/7
191/12 213/22 232/23 235/1 271/12
283/19 287/21 291/25 293/19 325/12
325/13
able [58] 6/10 12/14 12/23 14/18 15/11
15/17 15/23 15/23 16/14 16/17 17/18
18/22 23/22 24/14 31/21 57/7 58/10
64/17 65/1 66/2 66/11 66/16 71/7 84/16
86/7 114/13 121/23 122/18 123/1 139/4
140/16 142/1 143/2 144/23 145/3
158/22 159/16 162/22 184/4 186/23
190/5 196/22 199/7 224/4 225/6 226/7
235/6 236/7 240/15 242/20 252/3 254/4
269/12 284/19 286/12 289/6 299/22
322/16
about [373]
above [3] 42/13 72/7 329/14
above-entitled [1] 329/14
abrupt [1] 327/24
absence [2] 35/5 270/14
absolute [2] 59/6 266/17

<p>A absolutely [11] 5/16 17/2 45/11 201/13 227/7 255/1 272/2 292/17 308/1 323/14 328/16 absorb [1] 191/13 abuse [4] 80/25 81/1 212/13 309/16 abusing [2] 259/20 287/1 abusive [10] 31/6 31/9 31/15 31/16 31/18 33/11 146/13 193/25 228/3 304/17 academic [6] 14/22 25/7 51/19 80/21 270/16 272/18 academically [1] 124/4 accept [4] 324/14 324/16 325/15 325/19 accepted [1] 236/14 access [6] 80/11 80/12 145/1 254/4 254/8 256/2 accidentally [1] 260/19 accommodate [3] 94/5 191/22 193/8 accommodated [1] 222/12 accommodates [1] 192/8 accommodating [2] 111/18 192/21 accommodation [12] 66/13 110/17 114/17 119/14 119/20 119/25 134/17 135/15 183/6 183/9 192/11 193/17 accommodations [6] 40/8 114/18 120/3 120/17 183/2 193/2 accompany [1] 210/1 accordance [2] 139/5 141/25 according [1] 289/22 account [7] 213/9 213/11 213/13 224/17 225/16 259/13 307/8 accountability [3] 281/3 282/2 282/13 accountable [1] 282/12 accuracy [2] 129/18 144/9 accurate [18] 71/22 72/4 73/21 75/22 78/21 78/25 79/24 80/14 81/12 102/5 103/17 113/21 119/8 122/2 143/23 189/19 303/6 315/18 accurately [2] 114/13 140/19 accusation [2] 54/3 54/3 accusations [8] 43/2 47/8 47/9 47/25 48/12 48/13 53/9 53/17 accused [6] 35/17 35/19 35/21 43/1 63/3 324/25 accuser [7] 3/2 21/8 35/7 35/16 35/19 35/21 326/8 accusing [2] 42/16 42/25 achieve [1] 312/13 acknowledge [1] 214/2 acquaint [1] 136/21 act [2] 124/15 229/3 action [6] 78/2 104/8 241/16 242/6 264/9 271/5 actions [4] 48/2 81/7 109/25 231/16 active [1] 133/16 actively [3] 149/6 224/2 224/20 activism [1] 185/7 activities [5] 80/22 201/13 201/25 217/15 218/1 activity [1] 99/15 acts [1] 40/16 actual [9] 36/13 114/14 143/2 193/1 216/21 266/7 284/5 286/9 298/22 actually [86] 7/11 19/6 19/19 30/11 30/20 35/20 41/6 43/7 52/15 58/9 71/11 71/18 73/24 74/12 76/14 77/15 83/5 87/8 88/15 91/12 94/14 98/12 98/22 106/11 110/15 122/17 130/1 130/13</p>	<p>133/25 136/10 137/17 138/22 139/17 140/1 140/7 142/5 142/7 144/8 145/6 146/3 146/15 148/20 154/15 156/12 156/15 158/10 160/6 167/10 169/15 175/16 176/2 179/24 180/11 180/25 182/7 184/20 184/24 187/14 195/12 196/6 199/9 199/10 204/20 213/6 213/18 215/14 225/6 233/11 234/19 247/12 249/8 249/22 255/4 257/5 260/13 266/22 270/5 285/3 289/6 289/7 291/5 292/3 298/3 309/14 311/24 328/10 adapted [1] 282/7 add [7] 66/22 98/14 205/17 207/21 239/13 243/10 306/21 added [3] 130/11 262/21 296/12 addition [5] 4/7 54/17 175/11 202/18 298/13 additional [34] 6/5 23/16 27/25 32/9 37/6 37/10 67/1 74/13 96/10 131/4 144/24 151/1 157/25 159/15 162/23 177/12 221/17 242/19 243/19 254/17 261/13 274/13 274/16 280/19 292/23 294/19 302/11 302/17 321/14 321/16 321/25 322/22 326/7 326/13 additionally [1] 204/25 address [15] 7/10 15/3 81/24 94/5 128/12 128/13 152/10 152/16 203/20 238/12 241/14 241/15 257/18 258/14 259/24 addressed [8] 118/7 118/18 163/23 254/25 258/3 314/4 314/13 315/1 addresses [1] 308/9 addressing [3] 35/15 138/20 292/9 adequate [2] 25/3 41/13 adhere [1] 29/11 adhering [1] 220/5 adjacent [2] 50/4 157/5 adjourn [1] 14/4 adjudging [1] 22/12 adjudicate [3] 29/13 87/8 228/25 adjudicated [3] 259/3 260/2 307/18 adjudicating [1] 281/21 adjudication [3] 86/18 87/1 88/8 administer [4] 17/7 70/9 115/16 181/2 administered [6] 11/19 44/15 61/6 69/16 115/7 200/15 administering [1] 4/22 administrators [4] 122/11 158/11 160/9 198/19 administration [8] 42/19 70/10 81/3 99/12 138/7 138/15 138/23 284/23 administrative [156] 37/9 64/12 68/1 71/17 82/13 84/25 87/10 96/4 100/1 100/5 103/6 107/9 108/6 114/8 117/7 119/10 121/13 129/19 133/14 139/20 139/22 141/8 141/14 142/8 142/13 143/7 143/15 144/5 146/10 146/16 148/23 150/21 150/25 155/17 157/14 157/19 158/20 159/7 159/11 159/17 160/4 160/12 160/13 160/22 160/23 160/24 164/8 164/21 165/10 170/16 173/15 174/13 174/23 176/9 176/22 179/9 179/12 179/16 180/8 180/16 181/18 188/7 188/16 188/18 190/8 190/8 190/11 196/3 198/18 202/13 203/6 205/9 206/21 207/23 208/25 209/9 216/12 217/2 221/19 221/21 222/13 223/3 223/6 224/3 224/7 226/14 231/3 231/14 231/16 234/18 234/23</p>	<p>236/21 237/19 239/12 239/18 240/5 240/7 240/13 242/14 243/19 244/25 245/11 245/24 246/5 246/7 251/10 257/8 257/21 258/10 259/11 262/16 263/11 265/20 265/25 266/8 275/22 284/13 284/23 285/16 286/3 286/5 286/8 286/16 287/22 288/2 288/10 288/13 290/18 291/18 291/22 292/2 292/4 292/12 292/16 292/22 293/13 293/21 294/5 294/11 295/1 298/23 299/3 299/10 299/12 299/19 304/1 304/8 306/19 307/7 309/13 310/20 314/8 314/11 317/16 318/4 321/6 administrators [7] 75/15 76/2 76/7 138/9 252/2 279/16 279/23 admission [13] 31/6 146/18 147/14 155/7 165/1 171/2 171/24 174/5 177/4 281/13 289/12 300/2 303/16 admit [6] 134/7 134/10 155/12 164/10 303/20 320/25 admitted [45] 31/9 132/9 135/19 146/21 146/23 147/18 147/20 155/14 163/14 163/16 164/15 164/17 164/25 165/2 165/3 165/5 171/5 171/7 172/2 172/4 174/8 174/10 177/7 177/9 214/5 278/3 278/5 281/16 281/18 289/14 289/18 289/20 303/17 303/19 306/1 320/20 320/22 321/3 321/8 321/10 323/21 325/22 325/24 326/21 326/22 admittedly [1] 209/12 adopted [4] 30/19 31/14 183/24 312/10 advance [2] 65/4 293/21 advantage [1] 166/17 adverse [1] 68/16 advise [2] 287/21 294/13 advised [9] 7/17 33/5 143/4 167/10 167/22 199/2 285/22 286/15 292/8 adviser [29] 158/16 158/23 158/25 159/1 159/2 159/4 189/17 189/18 189/21 226/22 229/23 230/10 277/18 285/4 285/4 287/25 288/1 288/2 291/13 291/16 291/17 291/18 291/20 291/22 292/1 292/6 298/21 298/21 298/24 advisers [6] 82/18 82/20 224/4 229/19 231/12 231/12 advising [1] 202/3 advocate [1] 230/11 affairs [13] 70/22 70/24 70/25 72/14 72/18 72/24 76/3 86/15 137/24 279/5 279/19 279/20 280/1 affect [10] 118/21 119/3 249/13 255/11 256/4 256/14 256/23 305/7 307/24 308/2 affected [1] 80/15 affection [2] 238/15 240/25 affectionate [2] 237/24 238/1 affidavit [13] 223/10 223/16 223/25 275/1 275/8 304/7 315/6 316/16 320/23 324/3 324/11 324/12 325/16 affidavits [3] 254/22 323/18 323/22 affirmative [9] 25/21 25/24 25/24 26/3 26/17 37/22 38/16 38/20 40/3 affirmatively [1] 27/23 afford [1] 306/16 afforded [2] 110/6 142/14 afraid [1] 259/5 after [70] 6/5 7/20 7/20 32/1 37/8 37/9 38/3 46/2 49/21 52/1 52/1 53/1 53/4 75/9 75/20 88/25 91/17 92/13 94/16 94/18 95/24 106/11 112/6 117/11</p>
---	---	--

A
 after... [46] 121/21 122/4 136/23
 139/13 189/23 197/22 154/28 169/7
 172/11 172/15 172/20 172/22 172/25
 176/12 176/17 177/22 180/14 180/19
 181/18 181/21 181/21 182/15 198/18
 200/2 209/9 216/2 225/10 227/10
 234/18 239/9 239/12 242/20 243/8
 243/16 243/19 245/15 245/24 249/4
 251/21 252/6 254/10 283/20 284/22
 290/23 306/3 307/6
 after-discovered [1] 254/10
 afternoon [9] 4/9 5/15 7/14 136/3 136/4
 200/22 200/23 278/17 278/18
 afterwards [3] 155/20 225/14 242/16
 again [49] 19/3 22/6 33/24 37/12 38/25
 41/15 83/17 84/16 88/3 103/18 105/1
 108/16 112/19 113/22 114/16 117/5
 121/1 123/1 130/7 150/12 162/2 167/16
 181/17 181/17 195/3 202/2 207/1
 218/14 221/22 230/22 231/22 234/24
 236/23 258/25 259/13 261/19 262/8
 275/2 275/3 287/4 290/3 294/15 300/6
 302/1 302/16 321/19 326/14 328/1
 329/6
 against [40] 35/7 42/22 45/13 47/7 47/8
 48/13 53/9 53/18 62/3 62/11 89/20
 89/21 89/23 89/24 117/19 129/21
 133/18 133/18 133/20 133/25 146/3
 163/24 170/16 178/6 178/19 181/12
 214/15 217/17 239/13 242/8 243/7
 259/16 263/6 263/14 265/3 309/24
 309/25 310/1 313/15 320/4
 agencies [1] 202/25
 agency [4] 77/15 157/11 184/8 184/9
 agitated [2] 48/4 49/2
 ago [4] 59/13 161/7 168/1 308/10
 AGOSTINO [18] 1/14 1/15 2/23 2/24
 69/10 85/20 103/19 103/23 116/12
 125/6 131/11 131/25 155/9 183/1
 183/17 187/1 330/9 330/10
 agree [34] 64/15 78/11 79/20 79/22
 81/8 81/17 95/10 141/21 142/1 203/23
 204/1 204/17 205/13 205/22 207/16
 208/11 208/15 212/6 214/16 216/15
 219/20 220/25 221/1 221/12 228/6
 231/9 234/24 237/1 238/4 238/6 261/7
 272/16 272/19 328/22
 agreed [3] 76/18 164/21 220/17
 ahead [11] 48/8 51/5 95/12 115/3
 129/25 131/11 233/2 234/9 254/4 256/2
 275/7
 aid [4] 29/8 33/25 186/2 310/9
 aided [1] 1/24
 air [1] 185/9
 alarmed [1] 85/6
 alcohol [1] 219/5
 aligns [1] 281/9
 all [236] 2/6 3/19 3/20 8/3 8/19 10/19
 10/24 11/10 12/10 13/4 14/2 14/3 15/21
 18/14 19/21 20/12 20/18 24/11 26/12
 26/25 27/6 29/5 30/14 31/13 32/5 33/4
 34/2 35/8 37/9 37/13 37/14 37/17 38/24
 39/2 39/15 40/2 40/7 43/18 44/4 44/5
 44/17 45/2 50/21 52/3 53/1 60/7 60/11
 61/8 67/7 68/11 69/8 71/19 77/21 78/6
 81/13 81/15 81/21 85/17 86/12 87/8
 88/23 89/3 89/12 90/25 91/19 96/18
 97/4 98/20 100/16 101/13 101/16
 107/11 107/20 109/2 113/22 113/25

117/21 118/10 118/17 120/15 121/3
 123/17 125/10 126/9 130/20 131/1
 131/18 132/2 132/8 133/8 138/3 138/4
 133/4 133/13 135/7 135/19 135/25
 136/5 138/25 140/1 140/16 140/24
 141/10 146/21 148/12 149/1 150/12
 151/17 152/21 153/2 153/5 153/12
 155/3 155/4 156/13 156/24 157/6
 158/12 158/13 159/6 159/9 159/18
 159/21 159/21 159/24 160/6 161/21
 162/17 163/7 163/14 163/18 163/25
 164/24 165/13 165/16 167/5 167/13
 167/16 168/24 170/19 170/20 170/25
 173/2 173/11 177/7 179/6 179/21
 179/25 180/9 181/17 182/1 183/20
 185/18 186/3 186/6 186/8 186/11
 186/13 186/20 186/24 187/13 188/2
 189/21 195/13 198/20 199/4 200/7
 203/4 203/15 205/10 210/13 210/23
 211/2 212/20 214/15 215/10 216/5
 223/21 226/11 230/16 231/21 234/8
 234/19 235/3 236/20 243/3 244/24
 245/1 247/12 247/13 247/17 248/4
 250/25 252/15 256/14 258/14 263/2
 265/22 265/24 278/3 278/3 279/20
 281/3 285/22 286/2 286/6 286/11
 286/19 287/4 287/13 288/12 288/19
 291/2 291/20 293/16 294/10 296/14
 299/14 301/7 302/24 303/17 306/15
 307/11 310/24 311/11 311/24 312/15
 319/21 321/16 322/11 323/9 327/13
 327/14 328/24 329/6 329/7
 allegation [25] 85/8 91/13 116/25
 117/10 130/5 130/13 139/14 146/3
 162/25 163/24 167/8 178/1 181/24
 182/15 182/24 196/1 198/3 238/4 238/7
 238/8 239/24 240/3 240/25 297/3
 314/18
 allegations [34] 70/11 70/11 73/25
 83/19 84/15 87/19 89/21 90/16 90/20
 90/22 95/20 109/18 117/16 133/25
 139/25 170/14 170/22 177/12 178/6
 178/19 179/17 180/17 182/1 187/19
 237/13 239/11 239/13 239/15 241/13
 242/8 243/8 264/19 296/20 307/15
 alleged [19] 22/15 22/15 23/17 38/14
 60/5 79/15 88/2 100/7 107/10 117/6
 118/6 130/6 141/18 166/22 175/17
 214/20 225/22 228/1 230/8
 allegedly [4] 99/23 117/1 182/19
 318/18
 alleges [2] 42/14 42/18
 alleging [3] 42/18 139/15 260/17
 allocation [1] 202/4
 allow [26] 6/21 16/17 16/23 17/12
 23/15 24/10 27/24 29/17 29/18 80/13
 220/13 221/16 222/11 222/15 222/16
 224/1 226/3 240/16 243/7 243/15 247/9
 269/11 270/13 311/13 324/11 328/23
 allowed [30] 15/8 22/1 23/8 23/21
 82/18 82/20 103/13 103/14 103/16
 104/7 105/16 219/23 222/20 222/23
 232/15 237/13 237/17 238/24 239/1
 239/9 243/18 254/20 271/2 284/10
 317/10 318/2 318/7 318/11 318/13
 318/23
 allowing [2] 15/2 24/8
 allows [4] 181/3 203/24 226/19 270/12
 alluded [1] 281/25
 almost [5] 16/15 21/20 70/17 212/20

238/19
 alone [2] 49/14 172/12
 among [5] 173/2 73/16 134/14 205/14
 234/4
 already [32] 14/19 14/20 24/13 25/22
 31/1 38/15 46/5 106/15 106/16 107/9
 108/6 123/21 155/9 155/10 164/12
 171/1 198/1 206/20 213/5 221/12
 243/24 258/20 258/22 263/5 271/6
 285/14 285/19 294/20 297/21 306/1
 320/24 323/20
 also [99] 1/23 4/17 17/2 17/22 18/20
 20/4 20/21 22/4 22/20 35/7 37/10 38/9
 39/2 40/7 40/14 53/23 54/1 77/1 77/5
 80/25 94/13 101/24 118/16 124/5
 124/15 124/20 127/5 128/14 129/6
 130/6 134/15 137/3 149/24 150/16
 151/1 157/14 158/7 159/15 165/11
 166/8 166/11 166/14 168/10 178/5
 179/25 180/3 180/15 180/20 183/17
 202/9 202/16 202/23 203/14 211/25
 212/23 212/25 214/24 217/21 219/3
 219/3 224/8 226/1 228/22 230/25
 232/20 234/12 235/21 238/18 241/14
 242/8 242/16 251/16 253/18 254/7
 254/17 256/24 257/4 257/14 267/24
 269/18 270/15 274/25 275/2 277/1
 277/15 279/4 282/2 282/5 283/23
 287/15 293/16 297/14 300/19 304/17
 305/22 308/4 314/18 323/4 323/18
 Although [1] 305/9
 altogether [1] 232/11
 always [3] 131/5 218/23 223/24
 am [25] 5/16 31/21 36/12 44/25 45/10
 54/13 65/20 114/2 130/2 130/24 145/4
 149/6 179/2 184/17 202/16 210/4 221/6
 231/19 244/4 244/6 249/25 251/21
 251/22 325/12 325/13
 Amber [10] 65/16 66/6 66/8 87/5
 216/25 217/4 217/10 217/14 220/2
 291/1
 amended [5] 104/21 104/21 104/25
 105/14 112/7
 Amherst [3] 23/6 23/6 23/8
 among [5] 29/9 30/14 38/24 57/15
 219/16
 amount [2] 221/11 304/24
 analysis [5] 99/22 197/3 197/8 205/15
 256/14
 and/or [3] 37/13 166/24 207/15
 Anderson [3] 1/15 264/12 264/14
 ANDREW [2] 1/11 2/21
 Anecdotaly [1] 197/11
 anger [1] 212/15
 angry [1] 212/14
 Ann [7] 123/21 134/16 134/17 134/22
 135/9 135/12 194/22
 Anna [6] 124/19 124/22 135/14 161/20
 162/16 165/18
 Anna Dettlefsen [1] 124/19
 Annette [1] 97/24
 Annie [9] 97/21 97/25 98/7 123/22
 124/25 154/15 194/23 194/24 194/25
 Annie Eaton [1] 123/22
 annual [7] 147/12 149/2 149/21 219/7
 279/14 282/17 283/4
 annually [2] 197/7 233/25
 another [46] 10/6 22/25 35/22 40/19
 43/13 53/23 57/3 81/11 89/4 90/18
 90/23 91/6 105/4 106/23 107/21 108/15

<p>A another... [30] 110/25 111/16 117/10 126/9 128/1 134/1 134/2 148/18 153/20 168/9 178/24 178/24 188/10 193/24 217/21 219/17 220/20 226/25 235/8 240/2 244/19 246/11 246/11 250/18 251/10 255/21 281/2 286/22 319/5 324/4 answer [25] 23/19 46/15 59/10 71/7 74/6 105/5 114/13 119/23 121/23 122/18 162/21 170/7 184/4 186/23 188/23 209/22 221/4 226/20 227/16 227/21 227/21 228/24 247/4 256/21 262/18 answered [2] 59/17 119/23 anteroom [1] 246/1 anticipate [2] 30/18 274/15 anticipated [1] 290/22 anticipating [1] 7/24 any [189] 3/9 6/7 6/12 10/10 23/19 32/6 34/3 35/1 35/3 36/5 47/8 48/12 53/9 54/14 58/25 60/13 62/14 63/11 63/21 65/2 65/11 67/1 67/22 73/1 73/12 75/4 78/12 80/2 80/4 80/19 86/4 93/25 94/5 94/5 97/1 98/20 98/21 98/25 99/2 99/6 99/7 99/9 99/21 100/8 100/8 100/9 106/15 111/5 112/11 112/13 113/8 113/22 118/21 123/11 129/17 132/6 133/23 135/17 135/17 138/19 142/17 143/16 143/20 146/19 147/16 151/3 154/12 155/8 157/22 157/25 158/21 158/23 160/25 163/12 170/13 171/3 171/25 174/6 176/5 176/25 177/5 178/5 180/18 181/11 182/20 183/5 183/20 183/20 185/23 187/1 190/10 190/16 191/8 192/1 192/3 192/5 192/22 194/6 194/15 195/4 195/21 196/4 197/2 198/11 199/17 199/19 206/23 208/16 208/17 208/18 209/14 211/24 212/12 212/23 213/9 213/16 214/12 215/8 217/23 217/23 218/3 219/6 220/24 222/23 224/11 224/21 224/25 225/1 227/14 227/16 232/1 233/17 234/13 234/14 234/17 235/6 235/12 236/23 237/21 238/10 238/11 240/2 241/1 246/4 256/1 256/4 257/18 258/3 258/6 259/4 259/6 261/14 262/8 262/11 266/2 266/19 267/6 268/13 273/5 274/13 274/15 277/24 277/24 281/11 281/14 282/17 288/1 291/25 293/20 299/15 300/10 302/10 302/25 307/24 308/14 308/16 309/20 311/1 313/12 313/15 317/22 320/18 321/14 321/16 322/7 322/17 327/18 328/7 328/11 anybody [6] 60/13 140/7 247/22 268/9 291/16 327/18 anybody's [1] 58/8 anymore [1] 66/21 anyone [12] 5/9 40/9 66/9 80/18 98/15 110/7 151/6 158/22 243/7 268/2 268/2 302/16 anyplace [1] 224/11 anything [33] 3/3 39/23 41/9 43/14 47/7 52/19 60/9 63/15 66/3 68/9 84/20 86/4 88/2 91/12 114/14 118/20 124/11 137/15 156/24 159/16 170/13 175/15 189/18 195/17 209/14 209/15 227/4 240/18 246/25 279/21 307/10 313/20 327/3 anytime [2] 163/4 292/5</p>	<p>anyway [4] 6/15 12/15 131/10 267/10 anywhere [2] 213/16 259/6 apartment [1] 48/17 apologize [20] 10/23 70/6 103/22 105/6 106/7 116/18 118/19 120/12 126/17 128/3 188/22 201/18 227/24 229/7 256/7 260/8 267/4 271/18 272/6 319/6 apparent [1] 59/19 apparently [3] 36/15 36/19 126/16 appeal [4] 22/15 30/12 250/21 283/20 appeals [2] 28/22 33/13 appear [7] 101/8 126/4 189/4 216/13 224/15 294/14 295/4 appearance [1] 2/10 appeared [1] 93/8 appears [8] 75/8 85/2 97/23 118/8 128/4 128/10 261/2 295/15 applicable [7] 216/13 234/15 234/21 235/22 236/16 237/1 295/18 application [3] 41/6 249/2 252/16 applied [4] 22/10 22/12 22/16 34/2 applies [5] 26/2 26/3 30/14 30/15 38/24 apply [5] 24/25 72/9 267/24 305/1 309/16 applying [1] 41/17 appointment [1] 287/24 appreciate [7] 14/13 39/20 68/11 108/13 327/7 327/9 327/10 appreciating [1] 33/12 approach [18] 35/8 35/9 44/10 80/6 80/23 131/14 140/11 147/8 151/11 151/21 162/4 162/8 163/19 169/5 175/2 216/6 323/16 327/16 approached [1] 114/20 approaches [1] 33/23 approaching [2] 169/2 169/3 appropriate [16] 4/3 6/19 21/7 35/22 87/11 99/20 122/10 190/4 198/21 266/20 267/2 295/4 300/24 301/1 301/21 306/25 appropriately [4] 26/10 140/4 140/14 327/16 approval [1] 280/2 approved [4] 113/4 113/9 113/23 248/4 approximate [4] 55/4 55/12 56/12 56/17 approximately [6] 4/8 53/3 53/7 137/12 194/4 219/4 April [16] 1/6 36/9 36/9 36/14 36/14 37/6 37/10 43/8 43/17 109/14 135/11 181/13 223/19 263/18 263/20 264/4 April 12 [1] 36/14 April 12th [3] 36/9 263/18 264/4 April 13th [2] 181/13 263/20 April 20 [1] 135/11 April 25th [1] 223/19 April 5 [1] 36/14 April 5th [1] 36/9 arbitrariness [1] 28/10 are [476] area [19] 21/10 21/11 39/8 39/15 39/19 41/15 74/1 102/19 109/12 112/4 114/5 137/9 139/3 149/17 150/3 150/5 181/9 202/2 269/19 areas [2] 71/1 158/14 aren't [8] 81/17 108/4 191/5 211/12 216/10 216/10 269/12 269/21 arena [2] 309/21 310/3 argue [1] 194/6 arguing [1] 233/4 argument [5] 22/20 34/17 250/16</p>	<p>323/11 324/6 arise [1] 228/9 arising [1] 217/15 218/1 228/9 arose [3] 4/15 20/8 227/15 around [13] 41/3 49/1 49/24 106/9 137/12 222/1 260/22 284/14 291/2 291/4 298/20 316/8 316/9 arranged [1] 9/6 arrangements [1] 288/9 arrived [1] 60/22 Art [1] 137/4 articulable [2] 30/24 32/12 articulated [5] 33/17 255/13 266/25 280/17 305/7 articulates [3] 232/22 288/4 302/21 articulating [1] 15/6 Articulation [1] 145/20 as [406] aside [5] 40/25 55/8 138/1 181/10 293/18 ask [56] 7/5 8/13 9/13 14/17 14/25 47/13 50/15 55/7 64/12 74/4 82/8 83/2 89/4 103/9 103/23 105/19 106/18 123/20 125/14 162/9 186/15 216/15 216/16 218/12 226/9 228/6 230/14 231/23 235/8 235/11 235/13 235/14 236/2 236/3 236/6 239/9 244/12 249/17 254/4 264/12 270/8 272/9 284/5 292/19 292/23 299/22 300/16 301/2 301/18 302/2 302/6 312/23 313/14 318/7 319/5 326/14 asked [24] 4/3 39/4 39/10 39/11 45/12 59/11 62/2 63/14 64/14 113/1 123/14 126/24 138/14 186/16 197/5 220/4 221/3 234/13 236/23 272/25 292/14 302/10 302/25 323/9 asking [20] 16/15 17/11 40/9 40/10 40/20 62/25 78/14 82/16 83/25 122/21 208/1 208/2 208/3 233/5 241/12 242/4 247/3 270/10 271/10 313/11 asks [3] 129/7 169/3 302/16 aspect [4] 6/2 6/12 12/24 41/24 aspects [3] 7/6 23/14 317/11 assault [25] 41/14 42/18 43/3 57/9 60/5 70/13 77/18 77/19 78/16 80/16 80/19 83/19 91/13 109/4 118/13 166/23 185/5 193/25 207/14 230/8 240/9 240/10 269/8 301/12 301/15 assaulted [1] 54/4 assaulter [1] 325/1 assaults [2] 84/5 84/14 assert [2] 80/18 110/15 asserting [2] 81/19 107/4 assertion [3] 101/15 103/1 103/2 assess [1] 59/22 assessing [2] 99/17 99/18 assessment [5] 176/3 176/4 176/6 176/8 176/12 assign [4] 87/21 87/22 156/15 161/13 assigned [11] 124/6 124/7 124/9 124/16 124/18 125/17 158/25 161/12 161/17 163/1 167/23 assigning [1] 283/24 assignment [1] 165/18 assignments [1] 201/24 assigns [1] 161/14 assist [3] 124/13 149/15 166/3 assistance [5] 94/14 98/2 99/18 111/14 150/17 assistant [14] 121/14 136/15 137/4</p>
---	--	---

A
 assistant... [11] 149/16 201/22 201/25
 202/13 202/13 202/14 211/4 216/4
 288/13 291/1 300/7
 assisted [2] 119/19 194/24
 associate [7] 71/16 76/3 76/4 94/12
 149/18 202/1 279/19
 Association [2] 138/6 138/9
 assume [12] 10/1 24/11 81/4 119/5
 134/7 144/3 223/17 230/4 274/11
 289/15 293/3 314/25
 assumes [1] 227/19
 assuming [3] 210/3 224/22 226/11
 assumption [1] 230/9
 assumptions [1] 216/10
 assuredly [1] 35/6
 athlete [4] 34/1 39/1 186/4 310/12
 athletes [1] 29/7
 Atlanta [1] 23/24
 attached [1] 151/25
 attachments [1] 206/23
 attempt [1] 278/20
 attend [3] 66/3 124/8 226/14
 attending [1] 104/8
 attention [7] 42/10 195/6 223/21 254/7
 254/9 263/5 315/10
 attitude [1] 257/9
 attorney [7] 100/19 126/9 226/21
 226/25 233/4 291/23 292/1
 attorneys [3] 226/23 227/2 229/20
 audio [7] 54/10 54/13 230/13 244/16
 244/19 246/6 246/15
 audiotapes [1] 245/6
 August [2] 201/6 202/6
 August 2012 [2] 201/6 202/6
 auspices [1] 206/11
 authenticate [1] 10/5
 authenticating [1] 324/3
 author [2] 244/3 244/7
 authorities [1] 103/21
 automatically [1] 65/7
 available [21] 5/2 30/7 81/3 93/11
 121/21 158/12 161/11 164/9 173/18
 203/15 226/17 251/11 253/21 254/20
 287/8 287/14 287/24 291/5 306/12
 307/2 307/6
 avenue [2] 78/22 79/5
 avenues [3] 78/14 78/19 78/20
 average [1] 228/11
 avoid [1] 65/10
 award [1] 270/24
 awarding [2] 270/19 271/14
 aware [79] 7/16 30/6 33/5 45/12 45/15
 45/17 57/2 57/4 58/6 58/8 62/2 62/6
 62/10 63/16 67/15 67/19 67/21 67/23
 67/25 76/22 77/20 77/25 82/8 96/14
 98/25 99/6 100/19 121/20 151/17 152/6
 159/3 159/6 163/2 163/4 168/12 184/3
 185/1 192/14 192/24 192/25 193/1
 194/21 199/19 217/23 217/25 219/8
 221/22 221/24 222/5 225/23 230/8
 247/23 251/21 253/2 257/22 258/1
 259/9 261/17 262/1 262/5 269/7 269/9
 273/8 276/13 276/16 276/24 276/25
 277/4 277/5 280/20 294/25 306/4 308/5
 308/21 309/3 309/7 309/20 316/9
 316/12
 awareness [1] 80/23
 away [8] 49/14 74/14 104/23 170/1
 212/7 214/3 270/11 282/11

awkward [2] 44/23 61/16
 B
 back [58] 7/8 11/1 15/24 16/25 18/23
 23/7 23/20 24/16 27/24 32/19 35/16
 36/11 37/23 38/19 47/23 48/16 50/25
 50/25 59/9 59/9 67/2 92/9 111/2 116/10
 129/22 130/3 130/23 132/22 137/9
 137/16 150/24 169/25 187/22 200/3
 206/17 213/22 214/1 214/6 215/3
 219/11 224/25 226/2 227/8 236/11
 246/15 247/19 251/7 251/13 255/4
 263/17 265/19 267/9 267/11 268/17
 291/11 299/2 307/19 320/5
 back-to-back [1] 50/25
 background [7] 42/22 42/23 86/13
 136/7 137/19 278/23 278/25
 bad [3] 28/10 126/16 179/15
 bailiwick [3] 181/7 208/9 232/1
 balance [6] 16/2 19/4 26/12 301/20
 305/19 305/22
 balancing [4] 19/11 26/15 34/14 37/20
 Ball [1] 283/6
 ballpark [1] 59/24
 Bank [1] 1/20
 bar [5] 49/8 297/1 318/11 318/13
 318/17
 Barnes [2] 1/19 2/14
 barrage [1] 85/3
 bars [1] 47/20
 based [31] 19/23 22/1 23/9 23/13 28/17
 30/17 34/7 56/20 59/18 60/2 73/22 77/4
 80/11 93/3 103/3 103/17 114/8 125/22
 139/15 141/23 181/4 216/13 246/1
 251/1 260/10 271/12 282/22 294/23
 296/12 314/25 322/21
 basically [18] 15/16 40/5 41/9 96/8
 101/14 169/25 222/20 229/13 233/4
 238/15 242/4 244/15 254/11 255/9
 260/17 260/22 268/22 275/6
 basis [9] 28/7 89/20 147/12 220/10
 255/11 256/3 256/8 279/15 283/4
 Bates [10] 4/2 91/24 95/4 100/25 104/5
 131/18 132/3 152/2 197/14 322/11
 batting [1] 267/18
 BCC [1] 152/14
 be [381]
 Bea [1] 192/13
 bear [2] 39/13 149/11
 bears [1] 122/5
 beat [2] 232/19 250/13
 because [113] 4/21 5/25 8/1 10/10
 10/23 11/3 12/13 12/19 17/6 17/19
 18/17 19/18 21/6 21/14 22/9 27/14 29/3
 34/4 34/6 34/14 35/14 37/8 38/19 48/22
 49/1 49/18 54/25 56/23 59/17 72/23
 82/9 83/17 84/23 85/16 90/18 91/1 92/1
 92/25 93/20 94/2 96/12 98/8 99/20
 100/13 103/6 103/25 104/21 105/14
 106/6 109/2 112/22 114/23 117/1
 117/15 118/17 119/22 120/17 125/23
 128/25 130/3 130/20 134/5 136/6 139/3
 143/19 151/15 152/25 154/20 158/10
 158/20 164/5 164/6 170/6 178/14
 180/13 182/6 182/9 187/20 188/19
 189/24 192/3 194/8 195/5 196/15 198/1
 198/19 200/1 213/5 219/7 231/6 231/7
 241/13 252/10 252/19 253/22 256/18
 257/25 260/18 266/18 267/11 267/19
 272/10 304/23 305/16 308/5 312/22

317/16 322/22 324/15 326/4 327/14
 327/23 328/24
 becomes [4] 130/18 139/2 139/10
 198/17
 becomes [7] 121/21 131/10 174/23
 186/19 212/19 306/12 307/2
 been [162] 3/19 6/9 8/25 10/24 12/14
 14/16 16/22 19/18 25/22 28/25 29/14
 32/5 32/9 34/24 36/19 37/11 39/4 41/11
 42/7 43/12 45/12 47/25 48/22 51/16
 53/1 62/2 66/16 80/2 80/18 83/5 83/8
 88/7 89/15 91/17 92/25 94/23 97/5 99/3
 101/9 102/18 106/15 106/17 107/17
 108/8 112/7 114/17 114/19 114/20
 115/5 116/1 116/4 116/6 117/3 117/9
 119/23 126/14 130/9 130/15 136/9
 136/10 136/11 138/5 138/14 139/4
 148/5 149/25 151/9 154/20 161/10
 162/25 165/2 167/7 169/21 172/15
 173/11 176/18 176/20 177/22 179/9
 179/13 179/15 180/6 180/9 182/4
 188/19 190/22 191/15 201/7 201/12
 202/9 203/8 206/20 207/6 207/24
 209/12 210/14 211/8 214/15 214/20
 216/11 216/19 216/23 217/25 218/25
 220/8 221/25 225/25 227/6 239/15
 241/4 242/14 243/24 244/22 247/18
 249/23 250/9 251/3 251/4 251/8 251/13
 252/5 253/5 254/23 259/21 259/23
 261/4 261/4 261/18 261/22 261/23
 261/24 264/14 266/19 267/10 267/19
 272/8 272/14 283/1 283/2 284/23
 285/14 296/10 296/11 306/1 306/4
 307/8 307/23 309/4 309/21 310/2 310/3
 314/4 314/9 315/1 315/2 315/3 315/5
 317/18 318/7 318/16 326/22 327/7
 before [84] 1/7 15/12 17/1 18/10 21/11
 26/14 30/13 43/13 45/6 46/1 46/9 46/13
 51/1 52/14 64/6 68/15 71/23 73/6 75/13
 85/9 88/7 88/25 91/5 91/22 97/7 100/23
 102/10 105/18 106/17 108/23 125/11
 136/13 136/22 137/3 137/15 144/10
 160/12 160/13 169/15 169/17 169/18
 172/24 173/4 179/22 179/24 180/3
 194/14 196/8 199/12 204/8 204/9
 206/11 213/7 215/17 215/18 215/19
 217/12 221/13 222/17 222/20 224/17
 225/10 225/11 227/9 234/17 241/2
 248/8 258/15 259/11 261/1 266/1 274/9
 283/1 289/24 289/25 290/18 292/9
 292/24 293/13 293/15 307/10 311/12
 316/6 319/12
 beforehand [2] 167/9 225/13
 begin [4] 11/9 62/19 178/19 212/16
 beginning [9] 44/3 69/7 133/2 138/23
 200/6 219/25 231/22 234/12 274/3
 behalf [13] 2/17 2/20 2/22 2/23 2/25
 25/23 40/6 110/6 111/5 111/22 119/16
 143/8 159/4
 behave [1] 145/17
 behaved [1] 229/6
 behavior [52] 27/13 31/15 34/24 75/3
 78/12 79/15 81/20 84/15 88/2 99/23
 99/24 100/2 100/6 107/10 141/17
 145/11 145/16 146/14 149/23 175/17
 176/10 190/6 190/21 190/21 193/25
 196/2 213/2 214/6 225/13 226/2 229/8
 229/12 229/15 232/5 233/5 255/19
 255/22 258/4 261/21 266/21 266/25
 281/7 281/8 281/9 287/1 297/19 314/3

B
 behavior... [5] 317/15 317/17 318/5
 behaviors [6] 228/17 229/5 256/10
 256/15 260/1 305/23
 being [45] 12/23 15/17 15/17 15/23
 17/10 24/14 25/7 28/6 36/5 36/6 37/13
 40/4 47/8 53/8 78/2 78/4 80/22 81/18
 81/25 82/3 82/5 88/17 105/22 105/25
 117/4 119/8 130/20 141/4 144/2 169/7
 200/25 204/16 207/19 232/4 232/14
 237/23 237/25 257/24 259/9 286/22
 289/17 316/12 320/6 321/22 325/14
 belabor [4] 24/23 221/22 253/22 322/3
 believe [73] 5/20 8/6 15/16 18/6 46/7
 46/7 59/15 62/18 63/13 64/3 64/11
 66/17 71/1 93/4 96/10 98/19 102/20
 102/24 108/15 111/11 111/13 113/10
 116/4 116/9 119/2 119/4 122/7 123/3
 123/7 126/12 128/17 128/24 129/10
 129/15 146/4 146/12 146/13 147/24
 155/19 156/4 164/15 165/2 169/15
 169/21 178/21 179/7 180/5 187/13
 194/12 197/9 202/18 204/10 219/19
 237/3 237/4 238/18 238/22 243/8 244/3
 252/5 254/21 255/13 256/2 262/17
 262/19 278/24 280/8 288/11 291/24
 293/7 311/17 318/5 318/14
 believed [1] 102/18
 believes [1] 276/20
 bench [4] 62/21 63/7 262/2 262/10
 benchmark [1] 282/21
 benchmarked [1] 306/25
 benchmarking [1] 282/15
 BEND [12] 1/2 1/16 1/21 10/16 10/17
 10/18 18/24 137/8 137/9 137/10 137/16
 137/18
 best [20] 4/11 8/8 39/9 48/3 61/16
 63/18 63/20 66/4 89/19 138/15 154/9
 178/20 214/6 237/11 238/10 282/23
 282/25 296/12 328/23 328/25
 bet [1] 50/23
 better [12] 11/8 114/3 132/19 135/8
 135/8 149/24 171/20 177/16 186/16
 186/23 245/25 272/4
 between [50] 10/18 16/3 21/3 22/2
 28/19 34/20 45/19 50/20 52/24 62/7
 65/25 67/3 82/5 90/16 134/22 134/25
 135/9 135/13 151/18 157/3 160/25
 161/21 162/16 163/8 175/9 180/15
 193/13 215/12 215/14 228/16 241/17
 242/7 249/9 250/14 261/15 264/19
 265/19 269/8 300/3 304/25 310/6 310/8
 310/11 310/14 311/20 312/1 313/11
 316/23 318/19 326/9
 beyond [14] 18/25 43/16 67/2 74/8
 74/11 99/19 109/14 122/12 143/19
 155/8 155/10 283/25 314/5 321/17
 bias [5] 33/22 34/4 40/18 41/23 41/24
 biased [1] 251/9
 Bill [3] 76/3 94/12 151/8
 binary [1] 186/19
 binder [6] 123/15 215/15 215/15 215/17
 260/13 299/13
 binders [1] 161/25
 bit [20] 86/7 95/13 103/24 126/19 141/3
 142/11 157/18 158/9 162/17 168/1
 169/6 180/14 205/20 224/16 238/23
 266/9 281/25 293/8 299/2 312/22
 blacked [1] 65/9

blackout [2] 50/19 52/24
 blaming [6] 235/9 300/24 301/8 301/9
 301/14 301/18
 blanche [1] 101/14
 blanketly [1] 158/10
 block [1] 289/4
 blown [1] 13/15
 blurry [1] 216/20
 board [36] 33/15 75/23 76/1 76/18 77/6
 78/8 83/2 88/8 95/10 122/24 122/25
 139/21 141/5 141/20 150/22 202/4
 205/10 205/15 249/21 249/22 249/22
 249/24 249/25 251/1 251/6 251/14
 251/20 254/9 255/1 255/10 264/3 264/7
 264/13 306/10 306/13 307/3
 body [2] 42/16 139/12
 boils [1] 90/16
 bombard [1] 107/24
 book [27] 147/1 147/4 147/23 148/2
 156/12 156/18 156/22 156/25 157/7
 159/25 173/24 187/7 187/15 188/9
 188/12 193/11 193/13 203/11 203/12
 262/17 285/5 285/10 285/11 285/12
 286/6 290/23 296/4
 booked [3] 289/8 290/17 290/20
 booklet [2] 203/16 293/17
 both [56] 5/6 5/8 30/5 30/5 42/15 57/19
 57/23 58/15 59/5 63/9 90/6 90/17 92/2
 95/19 95/19 95/19 106/11 110/15
 110/17 127/25 133/25 142/13 142/19
 148/23 158/4 161/13 176/18 177/12
 182/4 183/12 183/14 215/12 222/19
 226/15 228/4 229/18 229/19 229/21
 235/5 238/1 254/7 260/19 263/9 263/10
 265/16 288/11 292/14 294/18 295/18
 307/15 308/8 309/11 309/14 309/14
 311/17 313/8
 bothered [1] 23/16
 bottle [1] 15/24
 bottom [3] 121/17 152/2 153/3
 boxes [1] 204/20
 boy [1] 295/16
 Bradley [1] 279/1
 branch [1] 79/25
 Brandeis [5] 20/8 29/17 29/17 29/18
 30/2
 breach [5] 20/4 22/9 28/6 28/8 34/12
 break [16] 60/23 68/17 78/18 132/15
 153/12 157/17 179/22 182/6 200/1
 273/23 273/23 292/5 317/23 318/3
 318/4 320/4
 breaking [1] 63/3
 breaks [6] 189/21 189/21 189/23
 229/22 284/9 292/3
 Brenda [1] 87/5
 Brian [1] 76/4
 bridge [1] 297/2
 brief [14] 10/4 10/6 14/9 16/9 25/5
 28/24 32/9 38/12 68/15 201/10 227/1
 312/18 323/10 326/15
 briefer [1] 198/1
 briefly [4] 39/24 39/25 198/13 312/17
 bring [9] 50/9 95/13 149/11 235/1
 237/13 237/17 238/9 238/11 238/24
 bringing [4] 30/23 43/4 237/21 240/24
 brings [1] 108/19
 broadly [2] 71/2 83/17
 broke [1] 195/25
 brother [3] 101/19 225/24 225/25
 brought [10] 28/6 36/12 50/1 62/3 85/1

214/15 239/4 254/7 254/8 276/19
 Brown [5] 22/7 22/25 23/4 28/11
 05/17
 building [5] 49/19 63/8 86/21 86/24
 144/17
 buildings [1] 40/4
 built [1] 40/4
 bulk [1] 90/1
 bullet [6] 146/1 146/3 207/2 207/25
 280/18 286/17
 bulleted [1] 145/22
 bullets [1] 145/22
 burden [7] 6/18 19/19 26/3 26/9 26/11
 26/13 26/16
 busy [3] 3/20 44/13 328/25
 but was [1] 268/6

C
 calendar [8] 83/7 160/11 160/13 221/20
 252/6 288/14 288/21 293/13
 calendars [1] 288/12
 call [47] 4/18 5/2 5/6 5/9 5/11 5/17 8/9
 12/17 13/13 17/18 30/7 31/10 31/11
 31/15 43/25 68/16 69/10 88/1 146/6
 146/6 147/4 200/8 200/10 216/9 217/3
 219/23 225/14 225/16 227/2 231/4
 232/3 244/1 268/20 280/12 280/13
 283/24 287/20 287/24 288/11 295/21
 296/1 306/17 306/18 306/19 306/20
 306/21 321/19
 called [13] 8/10 8/12 40/14 42/21 48/18
 144/17 176/11 184/18 211/11 218/5
 230/1 243/18 283/10
 calling [8] 6/5 44/7 195/6 202/9 261/9
 274/13 274/15 281/2
 calls [5] 27/3 69/12 227/20 243/15
 256/16
 calm [1] 49/22
 came [15] 37/8 37/9 51/22 92/13 92/14
 109/14 118/8 172/20 206/11 213/7
 225/23 241/14 275/10 287/22 292/24
 camera [5] 49/7 49/15 49/18 53/21
 53/24
 cameras [1] 54/9
 campus [31] 29/5 37/23 50/2 50/2 50/3
 71/1 79/1 80/17 80/20 86/19 93/17
 102/21 102/25 103/5 103/13 103/16
 137/6 161/11 161/12 166/11 184/20
 185/4 185/8 202/5 202/5 202/20 212/4
 261/6 279/15 279/23 283/3
 campuses [2] 185/5 283/13
 can [222] 2/9 2/11 5/3 7/2 10/19 11/1
 11/21 12/21 13/7 14/25 15/22 21/12
 21/13 24/4 24/16 31/19 32/10 40/13
 43/21 44/5 44/10 45/24 46/1 46/3 48/7
 50/17 54/22 59/3 61/9 62/17 63/24 65/5
 66/4 68/15 69/9 69/13 69/19 70/3 73/11
 74/6 74/15 74/23 75/14 77/15 78/11
 79/17 79/19 79/20 80/15 80/21 82/18
 82/25 83/22 83/23 84/20 85/4 86/15
 89/4 89/7 89/19 89/19 95/5 95/7 97/5
 97/16 105/8 106/5 108/11 108/11
 109/11 110/3 110/4 111/13 111/15
 112/5 112/16 113/15 115/9 115/10
 115/17 116/24 119/13 120/2 120/23
 121/6 121/12 122/21 123/12 124/13
 124/15 128/2 128/3 128/20 130/25
 132/16 133/4 138/4 139/9 142/16
 143/11 144/25 147/24 149/24 150/1
 157/9 157/18 157/18 157/20 157/22

C
can... [113] 157/24 158/13 159/19
160/11 161/24 162/15 162/21 165/10
166/12 167/17 168/9 168/24 169/2
175/7 185/2 186/15 187/22 188/12
188/18 189/17 189/20 189/23 190/2
198/20 199/8 199/11 200/8 203/9 204/5
207/2 207/13 214/6 214/8 216/20
216/21 221/3 221/23 223/22 223/23
225/12 225/15 227/3 227/21 227/22
229/1 231/23 232/18 234/4 234/23
235/13 235/14 236/9 236/10 240/5
240/10 240/13 241/10 241/12 244/21
245/11 246/15 251/17 251/18 255/13
255/15 256/22 256/23 258/10 258/14
260/5 260/16 262/20 262/23 270/19
271/24 273/2 273/6 273/17 273/23
274/25 275/1 275/3 279/10 283/7 285/3
285/4 287/25 287/25 288/2 291/16
292/22 293/5 294/2 294/18 297/17
298/23 299/17 300/2 303/7 305/3
306/16 306/21 306/22 309/8 311/15
313/21 316/25 319/4 321/20 326/24
327/15 328/19 329/1
can't [32] 14/23 18/20 24/24 41/3 48/22
59/8 59/10 82/16 90/8 91/14 97/3 99/8
106/6 159/8 170/7 189/18 199/3 220/19
227/22 236/13 240/9 240/12 246/18
253/16 258/24 269/7 270/11 271/7
271/7 282/14 299/11 313/17
candidly [3] 4/10 4/17 6/7
cannot [2] 58/23 79/22
capacity [1] 220/23
capriciousness [1] 28/10
car [2] 10/19 194/4
care [14] 3/6 30/4 97/25 99/4 123/14
123/24 124/7 124/20 141/16 212/21
213/12 218/7 229/13 229/14
career [2] 212/15 232/10
carefully [1] 116/20
cares [5] 29/4 29/5 29/6 29/7 267/11
Carly [1] 229/24
carried [3] 28/16 30/13 211/14
carries [2] 219/21 297/11
carryover [1] 295/13
carte [1] 101/14
case [199] 2/5 4/21 5/6 5/15 5/17 5/18
6/2 6/6 6/12 6/18 6/18 12/21 13/16
14/21 14/24 15/22 16/7 16/8 18/18
19/19 20/8 20/19 21/2 21/11 21/15 22/1
22/6 22/8 22/14 22/21 22/25 23/6 23/7
23/8 23/8 23/13 23/14 23/15 26/5 26/8
26/15 26/18 26/20 27/8 28/8 28/11
28/15 29/12 29/17 30/11 30/23 32/19
33/14 33/19 34/10 34/20 35/6 36/25
38/17 38/18 40/17 41/4 42/1 43/4 45/13
45/17 62/3 62/6 67/4 75/19 76/8 76/15
76/18 77/4 77/6 79/18 81/6 88/6 89/13
100/10 108/19 108/22 109/7 117/17
117/19 122/7 122/14 122/22 122/24
125/15 131/5 132/19 139/9 140/13
140/20 142/3 153/16 156/7 159/19
162/25 163/20 164/4 176/6 180/21
180/24 181/4 181/19 193/8 205/10
205/15 211/6 213/17 215/12 218/4
220/12 220/25 222/9 224/19 225/17
225/21 226/21 227/14 230/10 230/18
232/14 233/4 242/16 243/12 244/16
244/18 246/17 246/18 246/20 248/23
248/24 249/1 249/4 249/11 249/20

249/22 250/5 250/10 250/17 250/18
251/20 252/4 252/16 252/25 253/7
253/9 253/11 258/24 254/9 254/25
255/1 255/12 259/7 259/10 263/17
263/21 264/13 265/14 267/5 268/13
269/15 271/5 284/6 289/3 290/25 291/1
291/17 292/1 294/22 296/19 297/3
298/5 298/13 298/25 299/4 304/13
306/9 306/10 306/11 306/13 306/22
307/3 307/14 307/17 308/3 308/12
308/12 309/9 310/1 311/16 316/17
317/6 318/1 326/8 328/25
cases [41] 19/7 20/7 20/21 21/6 21/12
21/13 25/5 26/4 26/19 28/23 28/24
29/15 30/3 34/18 35/15 38/12 40/3
71/17 85/7 85/10 89/24 118/13 118/14
131/7 196/24 197/6 197/9 203/24
212/20 217/24 219/3 219/3 219/6 228/8
246/9 246/19 269/19 269/23 283/23
288/16 307/25
catalyst [1] 112/15
catch [1] 182/18
catching [3] 64/20 64/25 66/1
category [1] 158/3
Catholic [5] 99/21 182/11 280/9 282/2
282/19
caught [1] 12/17
causal [1] 33/21
cause [4] 2/3 27/6 100/3 148/18
causes [2] 148/20 229/3
center [6] 1/12 1/20 162/24 166/5
192/13 202/5
central [2] 137/22 219/2
cert [1] 250/15
certain [16] 26/2 29/11 33/1 54/13 60/6
79/2 136/9 172/24 207/17 229/6 254/5
254/18 269/24 274/19 305/23 316/21
certainly [27] 6/13 16/8 22/5 26/7 84/14
85/4 103/9 118/16 119/2 204/17 211/13
214/12 214/13 230/11 239/17 240/10
240/13 254/2 256/22 260/16 261/20
261/24 289/8 293/2 297/12 302/4
317/17
certainty [1] 59/23
CERTIFICATE [1] 329/11
certification [1] 138/9
certify [1] 329/12
cetera [3] 260/1 282/20 283/6
chain [2] 70/18 123/4
challenge [1] 91/11
challenged [1] 110/16
chambers [3] 2/6 327/23 328/6
chance [5] 68/17 132/1 151/24 232/8
232/9
change [20] 63/23 101/15 102/1 110/12
126/24 141/24 142/2 183/20 183/23
185/25 211/17 227/14 227/16 250/10
251/3 255/23 256/6 271/7 271/7 288/3
changed [5] 12/13 211/19 249/14 251/5
251/13
changes [4] 147/6 203/12 224/17
282/18
changing [1] 212/15
channel [1] 79/11
character [2] 319/1 324/10
characterization [1] 31/8
characterize [4] 50/18 57/7 83/23 101/7
characterizing [1] 233/8
charge [7] 87/1 134/25 213/7 216/24
232/3 240/22 269/1

charged [5] 170/15 207/19 232/3
248/11 266/11
charges [34] 29/18 31/11 88/12 86/22
88/25 146/6 195/8 195/11 195/16
205/10 206/18 207/1 207/5 207/22
209/15 211/8 211/12 211/19 211/21
214/15 214/22 215/23 215/25 224/20
241/2 247/15 266/10 266/16 269/24
275/19 275/21 275/24 276/1 276/4
chart [6] 70/19 72/9 72/10 72/11 72/23
140/16
check [11] 90/5 94/13 106/1 112/12
146/12 149/8 210/15 262/19 299/14
299/15 311/5
checked [1] 78/8
checking [2] 135/9 204/19
Chicago [2] 66/1 137/5
chief [5] 4/21 5/17 6/6 128/17 128/18
choice [4] 158/16 229/19 291/14
291/16
choose [3] 32/10 79/17 298/9
chose [5] 5/3 91/17 118/8 159/3 298/8
chronological [1] 326/4
chunk [2] 53/25 84/7
circle [2] 61/1 97/16
Circuit [11] 19/8 21/19 25/20 26/1 26/8
27/1 27/1 27/3 28/1 42/1 42/12
circuits [1] 28/2
circumstance [1] 218/24
circumstances [7] 21/15 34/23 47/18
114/9 153/16 226/11 304/4
cite [3] 21/12 21/13 25/5
cited [7] 16/9 20/22 28/24 28/25 38/12
38/17 214/19
citing [1] 209/20
City [1] 318/11
civil [9] 42/3 109/17 109/20 241/16
242/6 269/7 276/9 276/14 282/12
claim [7] 19/23 20/4 21/3 28/8 34/12
34/13 129/7
claimed [1] 62/15
claiming [2] 317/19 317/24
claims [13] 14/16 19/21 28/6 43/4
70/16 89/24 122/1 124/9 143/12 204/14
269/12 277/2 277/6
clarification [10] 77/9 86/3 103/19
133/24 193/15 205/5 207/21 244/24
271/6 311/17
clarified [2] 284/12 294/23
clarify [25] 81/14 102/22 105/16 109/11
115/6 122/21 157/15 157/15 159/10
159/16 188/6 188/18 198/2 235/6 235/7
236/9 239/1 239/20 239/21 240/15
292/11 292/15 292/16 294/17 294/18
clarifying [1] 88/18
class [6] 62/19 62/24 63/9 63/13 262/3
262/4
classes [4] 101/18 135/15 183/3 223/7
classroom [2] 63/12 67/13
clean [1] 327/15
clear [19] 5/16 14/21 17/19 18/18 18/19
19/8 25/8 28/9 28/14 40/7 45/5 135/1
169/22 194/10 195/3 215/5 223/22
234/25 249/9
clearly [5] 33/3 48/3 49/1 249/7 280/17
clerk [1] 103/25
click [1] 286/12
client [1] 6/24
clinician [2] 191/11 192/4
clip [6] 57/22 58/7 58/8 58/14 260/13

<p>C clip... [1] 328/5 close [17] 51/9 51/9 64/16 54/18 54/20 54/21 55/20 56/3 56/6 56/8 56/12 56/16 56/21 56/22 59/4 181/10 327/20 close [6] 59/3 61/1 64/10 74/14 83/10 248/21 closed [1] 301/13 closely [3] 72/22 192/12 241/11 closes [1] 142/1 closing [2] 323/11 323/17 clubs [2] 201/15 201/21 CNN [1] 42/9 cocurricular [1] 80/22 code [10] 27/19 204/22 220/15 233/10 258/8 262/14 279/13 280/8 285/8 294/17 codes [1] 29/13 coerced [1] 240/8 coercion [1] 22/11 coercive [1] 85/13 cognizant [1] 42/19 collaborative [1] 279/24 collapse [2] 13/16 15/20 collateral [1] 324/9 Colleague [5] 91/18 109/8 109/14 109/16 269/9 colleagues [2] 14/6 232/25 collection [1] 140/6 college [7] 32/3 124/7 137/17 137/24 185/5 279/4 283/13 colleges [2] 269/18 269/21 colloquially [1] 32/22 color [2] 203/11 241/1 Columbia [3] 21/18 42/1 42/11 column [4] 72/3 141/10 141/11 195/7 combine [3] 117/24 258/11 260/5 combined [3] 37/11 134/2 265/18 come [52] 7/8 17/8 18/23 27/12 33/4 35/16 44/11 45/21 48/21 48/24 49/9 61/4 62/25 69/13 73/11 78/15 80/24 82/16 84/20 90/6 90/9 90/24 100/16 112/13 179/3 179/19 180/3 181/17 200/12 202/24 213/22 214/1 214/6 219/18 223/1 233/18 235/10 243/9 245/16 250/18 258/25 283/3 283/11 287/25 288/9 288/24 288/25 289/3 290/24 295/1 299/17 301/10 come-back [1] 35/16 comes [16] 20/16 71/21 74/8 79/11 79/25 122/4 150/24 197/6 218/19 239/24 244/7 245/4 245/19 297/15 307/6 307/11 comfortable [5] 52/23 56/25 226/23 226/24 268/19 coming [14] 7/13 68/12 75/20 88/22 93/10 131/4 133/16 184/9 201/9 215/3 222/7 260/19 294/11 305/10 comma [1] 248/1 command [1] 70/18 commence [1] 177/21 commencement [4] 11/10 11/11 11/12 271/24 comment [2] 231/11 268/17 comments [4] 14/3 25/18 51/16 231/13 commit [1] 31/15 committed [5] 33/6 34/23 108/25 109/2 148/4 common [9] 212/11 212/14 230/25 235/10 235/13 273/8 288/3 301/1 301/9</p>	<p>communicate [6] 64/22 144/24 145/18 197/22 298/1 298/4 communicated [10] 8/25 9/5 9/9 64/24 113/17 180/6 211/9 214/10 266/23 312/9 communicating [4] 74/8 194/19 316/25 317/1 communication [19] 100/17 100/18 112/8 137/22 151/3 151/6 151/8 153/5 153/11 153/12 161/24 184/11 192/1 192/1 194/18 234/17 287/2 292/7 321/5 communications [8] 90/16 152/18 152/20 161/21 163/8 183/18 184/9 199/19 communities [1] 234/3 community [57] 17/1 64/24 71/7 82/23 86/17 88/19 89/1 114/7 114/12 115/8 115/15 121/22 122/11 122/12 122/15 122/18 123/8 136/15 137/13 140/7 140/8 143/1 144/17 144/23 145/17 149/14 158/9 158/10 160/8 176/20 177/23 180/11 180/25 181/1 189/23 190/12 198/19 199/9 201/3 202/7 202/8 212/4 212/25 244/10 260/9 263/2 280/9 280/16 280/25 281/4 282/3 300/7 305/4 305/6 305/19 305/23 314/20 comparable [4] 34/24 124/17 124/24 309/3 comparative [3] 35/8 35/10 35/13 comparatively [1] 195/1 comparator [4] 21/7 35/20 35/22 37/17 compared [3] 186/9 186/18 194/25 comparing [1] 194/22 compel [2] 241/15 242/7 compelled [2] 109/24 109/25 compilation [1] 162/3 compile [1] 211/2 compiled [2] 174/20 175/14 complainant [58] 21/4 22/3 27/11 30/5 34/21 73/24 74/20 75/9 77/15 78/4 79/18 86/6 87/15 88/4 88/9 88/11 95/19 110/7 110/11 111/17 111/20 118/14 118/22 118/23 119/2 125/4 125/18 140/1 144/2 158/5 161/23 175/19 176/14 181/3 192/24 211/5 222/8 225/9 226/15 234/16 235/5 236/8 240/19 253/18 258/13 258/14 259/2 259/14 259/25 263/6 268/5 289/25 291/5 294/18 300/3 300/11 300/17 313/15 complainants [17] 38/1 41/12 42/6 89/20 110/15 125/24 159/14 161/12 173/22 183/12 196/24 230/7 230/10 295/18 295/20 301/11 314/12 complained [2] 313/3 313/5 complaining [5] 197/10 227/5 239/6 277/15 317/1 complains [1] 101/17 complaint [50] 6/2 35/5 35/7 35/9 35/9 35/16 36/4 36/5 36/5 36/7 36/8 36/12 36/15 36/23 37/3 37/6 37/7 37/10 42/13 43/8 73/13 77/7 83/15 84/2 85/1 94/18 96/15 105/21 105/25 106/10 109/3 109/4 129/21 206/9 257/24 259/16 263/6 263/7 263/8 263/13 266/3 271/20 271/23 309/24 314/1 314/2 314/4 314/17 320/3 320/6 complaints [31] 36/10 36/14 37/5 37/6 37/15 41/7 41/13 41/20 41/21 42/6 42/17 73/2 73/10 73/11 73/15 78/16 83/8 90/7 131/4 138/21 142/24 181/11</p>	<p>182/14 185/19 257/15 257/25 263/9 263/10 276/21 307/19 308/19 completed [70] 18/24 24/15 24/21 22/23 123/15 220/18 271/11 271/24 273/6 312/6 completed [7] 14/19 24/17 179/9 179/13 206/20 242/15 265/24 completely [8] 24/8 36/24 36/25 54/8 71/5 234/6 294/9 327/25 complex [4] 11/23 244/18 246/19 246/20 compliant [1] 150/2 complicate [1] 265/16 complicated [6] 20/14 228/10 269/19 269/20 323/3 328/25 complications [1] 20/11 compliment [1] 23/10 component [4] 118/16 147/3 154/13 261/20 components [1] 144/18 comprehensive [1] 283/3 computer [3] 1/24 111/25 196/17 computer-aided [1] 1/24 concede [1] 32/16 concept [3] 184/7 280/8 322/9 concern [22] 6/16 7/11 27/16 32/6 37/12 37/20 47/8 57/12 77/19 77/25 86/3 88/13 93/4 93/8 119/6 124/4 150/4 150/14 159/13 176/9 259/18 288/6 concerned [21] 4/16 10/24 37/23 37/25 38/9 47/24 48/2 53/8 53/17 54/2 54/6 54/7 81/22 92/24 93/1 93/6 131/6 131/7 185/15 225/17 256/12 concerning [4] 97/8 267/2 305/18 311/8 concerns [23] 29/16 36/4 45/17 62/6 67/16 77/1 77/22 78/5 81/24 94/5 98/20 118/5 124/3 129/17 150/15 153/1 154/15 157/21 176/8 184/23 277/7 318/5 323/22 conclude [1] 82/3 concluded [4] 142/9 143/16 181/19 307/8 conclusions [1] 216/10 concurred [1] 220/4 conditionally [1] 18/4 conditions [1] 226/1 conduct [92] 4/20 27/19 29/11 29/14 41/8 70/14 78/5 81/15 84/17 86/18 87/8 87/20 88/16 122/24 138/7 138/25 140/9 140/25 145/6 145/8 145/10 145/13 145/20 146/2 148/17 150/18 157/15 160/7 166/24 175/20 176/1 176/16 176/19 178/12 180/13 181/1 181/2 184/13 198/20 199/5 199/12 201/23 202/21 203/3 204/23 205/6 207/15 207/25 211/18 214/3 219/4 224/25 225/22 226/5 226/5 228/3 229/2 231/5 231/8 231/8 232/25 251/20 254/2 254/25 263/9 263/13 263/21 264/2 264/6 266/4 267/1 267/2 270/2 270/17 270/20 279/13 280/8 280/12 281/10 283/5 285/8 287/18 294/4 294/17 296/20 304/15 304/15 304/21 305/18 305/18 309/12 312/3 conducted [7] 204/19 208/24 237/6 237/8 237/10 254/3 308/2 confer [2] 18/10 292/6 conference [2] 138/17 270/6 conferences [2] 39/4 138/16 conferral [1] 271/25</p>
---	--	---

C
 conferred [6] 15/4 17/15 18/1 18/4
 180/11 189/25
 conferring [1] 17/23
 confession [1] 79/3
 confidential [4] 78/19 78/22 79/25
 152/4
 confidentiality [2] 3/3 68/24
 confirm [5] 5/1 43/12 144/9 261/4
 319/10
 confirmed [2] 6/21 113/19
 conflict [1] 219/16
 conform [1] 275/17
 confuse [2] 112/4 170/13
 confused [2] 249/8 250/13
 confusing [2] 127/23 130/3
 confusion [1] 65/11
 connected [4] 94/22 99/7 162/24
 218/16
 connection [10] 33/21 96/14 109/8
 109/15 112/19 112/21 115/3 124/9
 223/10 315/7
 Conrad [1] 1/11
 consent [1] 187/20
 consequence [1] 232/4
 consequences [3] 91/8 211/14 232/12
 consider [22] 28/2 32/11 76/21 100/3
 133/20 142/24 190/4 191/1 224/22
 224/25 235/14 249/3 251/9 251/14
 262/8 262/11 287/13 297/9 301/18
 306/11 311/22 326/24
 consideration [9] 133/10 160/3 243/20
 249/4 292/13 292/13 292/19 311/1
 323/19
 considered [19] 36/5 36/6 37/14 86/2
 114/22 121/21 122/5 141/5 150/22
 190/8 219/15 256/9 259/22 259/23
 274/17 305/11 306/3 306/8 310/21
 considering [3] 213/14 258/9 311/12
 consistent [3] 35/12 127/19 237/5
 consisting [1] 123/3
 consists [1] 115/14
 constantly [1] 259/16
 constitute [3] 193/25 229/9 229/16
 constituted [1] 22/18
 constitution [1] 282/1
 consult [5] 39/11 268/2 268/9 268/20
 292/1
 consultant [7] 97/25 99/5 123/14
 123/24 124/7 124/20 141/16
 consultants [1] 283/16
 consulted [1] 220/3
 contact [67] 41/21 43/10 62/11 63/3
 67/17 67/23 70/13 71/6 73/15 73/16
 84/8 87/18 91/13 94/2 103/7 103/10
 110/6 110/12 111/21 111/22 118/6
 125/2 125/17 139/24 140/3 140/3 142/6
 152/25 153/13 154/6 154/16 165/11
 165/21 167/23 168/2 168/5 168/7 168/9
 168/12 169/17 169/18 170/14 170/24
 176/14 176/18 181/15 187/16 194/5
 194/17 197/17 197/21 225/9 226/16
 250/4 257/16 257/17 258/1 258/5
 258/19 259/17 261/5 262/9 304/23
 308/20 309/1 314/18 321/6
 contacted [12] 86/5 111/14 116/1 116/8
 125/3 142/4 172/15 182/1 182/3 182/7
 283/1 283/2
 contacting [2] 126/24 128/24
 contacts [1] 314/3

contain [2] 175/11 208/16
 contains [3] 147/1 208/12 315/13
 content [2] 86/8 149/2
 context [57] 20/10 38/16 47/11 50/11
 83/4 85/17 86/8 88/14 150/15 190/16
 193/24 194/1 194/2 194/20 195/18
 199/8 203/23 206/22 210/10 211/16
 219/1 225/12 225/15 225/16 225/19
 226/4 227/15 228/13 228/15 228/15
 228/17 228/22 229/10 230/16 235/1
 235/24 236/7 236/8 236/9 236/10 240/3
 245/3 245/23 255/17 258/10 259/7
 259/8 259/9 262/9 262/12 262/15
 263/14 296/24 297/16 297/17 316/7
 317/7
 continual [2] 307/19 307/19
 continually [3] 39/3 49/22 306/16
 continuance [1] 113/2
 continue [9] 90/23 90/24 101/25 104/8
 139/5 150/1 168/9 306/21 316/25
 continued [5] 105/24 185/8 221/15
 224/21 275/12
 continues [5] 108/16 128/8 166/11
 169/5 169/6
 continuing [3] 4/1 148/18 234/11
 contract [5] 20/4 22/9 28/7 28/8 34/12
 control [1] 16/21
 convenience [2] 132/16 323/2
 conversation [16] 49/22 56/15 56/23
 57/2 150/20 154/25 169/22 187/22
 192/5 195/18 216/11 268/11 268/20
 297/11 316/23 324/3
 conversations [7] 59/18 219/20 220/7
 220/9 225/1 232/24 246/8
 convince [2] 249/17 249/18
 convinced [1] 13/4
 convoluted [1] 130/15
 coordinated [2] 60/23 154/16
 coordinates [2] 264/16 264/17
 coordinating [1] 153/19
 coordinator [45] 69/25 70/8 70/9 72/5
 72/10 72/19 72/22 73/8 112/17 112/18
 114/25 121/25 122/3 123/14 124/5
 124/16 124/17 124/19 134/19 136/8
 136/13 139/8 149/13 149/20 156/15
 158/22 161/8 161/9 161/10 161/17
 161/22 162/19 162/20 163/1 164/4
 165/9 165/19 190/18 192/7 201/15
 201/20 206/15 206/25 207/11 240/11
 coordinator/care [1] 123/14
 coordinators [2] 124/15 138/25
 copied [6] 92/1 123/6 152/18 152/20
 162/1 163/8
 copies [10] 123/15 131/21 161/24
 211/2 211/3 211/5 211/8 215/4 215/6
 216/2
 copy [15] 92/1 103/9 103/11 104/4
 131/25 151/12 163/19 188/10 188/11
 203/13 223/4 241/21 253/12 255/15
 298/8
 copying [2] 128/10 128/14
 Cornell [3] 20/25 21/1 23/5
 correct [269] 7/1 9/23 12/11 18/2 18/5
 19/14 53/10 56/18 57/13 57/20 57/24
 58/22 67/13 72/3 72/5 75/21 75/24
 76/10 78/17 78/20 79/5 81/11 81/25
 82/1 82/12 93/12 95/2 96/20 97/8
 106/25 107/3 108/17 108/20 110/10
 112/2 113/20 115/5 122/1 125/15
 125/19 126/7 126/10 126/21 128/8

135/2 141/8 150/8 153/9 154/1 161/15
 168/18 187/11 188/17 189/5 191/16
 191/18 192/18 203/22 204/14 205/4
 205/24 206/5 206/6 206/7 206/12
 206/13 206/16 206/21 207/20 208/6
 208/17 208/22 208/23 209/1 209/2
 209/10 209/11 209/16 209/17 210/2
 210/4 210/11 210/12 210/14 211/15
 214/22 215/2 215/9 215/20 215/22
 217/1 217/2 217/3 217/5 217/6 217/8
 217/9 217/13 217/18 217/22 218/2
 218/17 218/18 219/13 219/14 220/23
 221/7 221/13 221/14 221/18 222/12
 222/17 222/22 222/25 223/5 223/11
 223/19 225/5 226/13 228/11 228/12
 228/20 228/21 229/4 229/13 229/18
 229/20 229/21 229/22 229/24 230/2
 230/19 230/23 230/24 231/18 234/21
 234/23 235/4 235/20 235/22 235/23
 235/25 236/1 236/17 237/6 237/10
 238/16 239/12 239/23 242/11 242/12
 242/21 242/25 243/5 243/5 243/6
 243/11 243/16 243/20 243/22 243/23
 244/2 245/5 245/12 248/23 248/24
 249/16 249/21 249/25 250/24 250/25
 251/8 251/18 252/4 252/17 252/18
 252/20 253/12 253/18 253/19 253/25
 255/12 256/4 256/9 256/14 258/10
 261/9 261/13 261/16 263/3 263/16
 263/18 263/25 264/1 264/14 264/17
 266/14 267/14 267/22 267/23 268/1
 268/24 268/25 269/3 269/5 269/6
 269/10 269/16 269/17 270/12 270/18
 270/20 271/1 271/4 271/14 271/21
 272/2 272/19 272/20 272/25 273/3
 273/11 275/22 277/19 277/20 279/9
 284/18 284/20 285/12 286/10 286/14
 286/17 286/20 287/2 287/3 287/7
 287/20 290/2 291/8 291/10 292/25
 294/12 295/2 295/19 297/23 300/12
 301/5 301/6 302/14 304/3 310/22
 310/23 311/10 313/1 314/6 314/10
 314/24 315/1 315/16 315/19 317/20
 318/2 318/9 318/24 319/12 319/18
 319/20 321/24 329/13
 correction [1] 4/4
 correctly [5] 105/15 146/1 155/24
 262/22 267/25
 correspondence [4] 107/11 162/16
 196/6 196/8
 Coughlin [1] 76/4
 could [140] 2/10 4/11 4/14 10/17 11/7
 11/16 12/8 17/1 21/2 26/6 27/15 36/1
 39/18 41/6 41/18 44/24 47/16 47/25
 48/25 51/2 56/14 59/17 59/22 61/16
 61/17 62/25 65/13 65/17 65/17 66/5
 66/9 68/4 71/12 74/12 75/3 76/19 79/15
 80/19 84/21 85/5 87/14 88/3 95/10
 98/12 99/24 100/3 102/21 103/12
 103/24 107/10 110/7 112/24 116/1
 118/7 118/16 121/16 122/8 122/8 124/4
 125/4 129/17 134/20 139/17 141/13
 141/18 141/21 145/5 157/13 157/14
 161/8 171/17 171/18 173/14 175/17
 176/4 179/15 180/13 186/23 188/23
 190/22 195/13 200/25 201/10 206/22
 210/22 211/16 214/17 215/25 218/3
 219/1 220/21 222/4 225/19 226/17
 230/9 231/20 232/9 232/10 236/2 237/7
 239/2 239/4 239/14 241/19 251/8

C
 could... [35] 254/18 254/19 256/21
 267/13 260/21 257/23 261/24 262/19
 266/19 267/6 269/4 269/15 270/13
 270/21 270/24 271/3 271/9 273/1
 278/25 281/24 287/16 288/11 297/7
 301/12 301/13 301/16 301/18 303/20
 304/1 305/6 309/6 311/19 315/1 315/2
 317/21
 couldn't [2] 226/3 236/3
 counsel [34] 7/16 7/20 7/25 8/12 11/7
 25/23 28/11 65/9 70/21 70/22 71/16
 71/16 107/13 149/19 164/1 180/15
 204/7 208/3 208/5 226/10 226/13
 226/15 226/17 226/20 227/3 229/18
 247/9 274/18 274/24 277/11 277/14
 278/8 279/21 303/8
 counseling [9] 78/23 93/14 99/11
 162/24 166/5 212/13 214/5 260/18
 309/16
 counselor [6] 78/24 190/5 190/14 225/4
 225/6 226/7
 counselor's [1] 305/8
 counselors [4] 224/2 224/13 225/2
 305/10
 counsels [1] 70/23
 count [1] 138/4
 counter [1] 90/11
 counterclaimant [1] 95/18
 counterclaim [1] 309/11
 countercomplaints [3] 89/25 90/2 90/21
 counterpart [1] 29/16
 counterpart's [1] 25/18
 country [1] 28/2
 County [2] 103/21 241/16
 couple [41] 3/14 3/17 3/24 25/17 26/4
 37/19 38/12 62/24 71/5 74/4 74/15
 75/16 86/12 95/21 100/20 115/14
 123/20 130/3 133/7 133/8 144/15 153/2
 169/7 178/23 181/4 181/13 198/12
 209/13 218/7 224/5 230/14 248/8 270/8
 272/9 273/19 275/14 278/8 297/4
 308/19 312/23 328/21
 course [28] 4/10 18/6 18/14 24/3 24/15
 31/2 31/10 41/8 58/2 65/6 147/12
 148/17 152/21 156/10 158/13 168/24
 169/1 185/13 198/9 239/5 248/25 292/2
 292/7 296/21 297/18 304/15 305/17
 305/18
 courses [2] 14/18 272/14
 coursework [7] 14/19 17/10 264/25
 270/22 271/3 271/11 273/6
 court [76] 1/1 2/1 5/12 6/17 20/9 21/2
 21/16 21/18 21/25 21/25 22/9 23/8
 27/15 28/1 28/20 28/22 28/22 30/1
 30/18 31/12 32/10 32/25 33/13 33/13
 35/2 36/2 36/2 37/21 38/6 38/22 42/11
 44/2 44/24 61/18 66/24 69/6 78/13
 104/9 133/1 133/10 136/21 137/20
 139/10 141/13 145/5 152/21 158/13
 161/9 162/15 162/17 168/24 173/14
 175/7 200/5 242/5 250/15 250/16
 250/17 273/23 274/2 274/23 278/25
 279/10 281/22 306/15 306/18 306/19
 306/20 309/7 310/25 312/2 316/7 322/4
 327/8 329/17 329/17
 Court's [3] 28/14 28/18 34/18
 courtesy [1] 298/2
 courtroom [4] 3/20 5/2 51/3 51/5
 courts [2] 21/23 41/17

cover [1] 158/24
 covered [5] 53/21 54/1 111/6 278/23
 278/24
 create [12] 30/24 32/12 81/13 168/7
 173/17 196/8 212/8 212/25 234/1
 234/22 280/13 282/4
 created [3] 27/17 33/17 175/8
 creates [4] 84/18 166/24 207/15 272/16
 creating [3] 234/3 280/9 282/1
 credence [1] 101/23
 credibility [9] 256/17 256/23 257/8
 257/11 259/14 261/19 262/11 325/12
 325/13
 credible [1] 257/7
 credits [3] 24/25 25/1 25/4
 criminal [5] 31/11 32/25 120/7 281/22
 312/2
 crisis [2] 136/25 137/7
 criteria [1] 77/3
 critical [5] 42/5 101/8 101/9 108/16
 130/20
 criticism [2] 42/15 105/24
 criticisms [1] 42/20
 criticizing [1] 193/21
 cross [17] 5/3 7/4 52/5 52/7 67/7 67/8
 132/18 136/1 187/3 264/19 278/13
 278/15 308/19 330/4 330/7 330/10
 330/13
 cross-allegations [1] 264/19
 cross-complaints [1] 308/19
 CROSS-EXAMINATION [8] 52/7 67/8
 136/1 278/15 330/4 330/7 330/10
 330/13
 crosses [2] 304/21 304/24
 cruel [1] 107/6
 culled [1] 326/13
 culture [5] 29/1 29/4 33/17 185/4 282/2
 cure [1] 24/9
 cured [1] 24/5
 curiosity [1] 160/2
 curious [2] 169/24 264/22
 current [8] 16/25 17/11 18/11 34/20
 180/16 201/1 217/15 226/6
 currently [5] 91/18 117/3 120/6 202/12
 276/13
 cursory [1] 196/15
 cut [2] 51/3 303/5
 CV [2] 1/4 2/4

D
 daily [1] 220/10
 damage [2] 146/14 286/21
 damaged [1] 130/9
 DAME [133] 1/5 1/23 2/4 2/15 2/17
 2/18 4/19 6/6 6/20 6/24 7/4 7/12 8/15
 9/3 10/12 11/8 17/1 27/9 27/13 27/17
 27/22 29/2 29/10 30/4 30/14 30/19 31/3
 33/1 33/2 33/18 33/23 34/4 34/6 34/8
 36/16 36/18 36/23 37/2 37/14 37/24
 38/11 38/23 39/3 42/2 42/8 44/25 45/13
 45/18 52/11 55/18 57/23 57/25 58/2
 58/15 61/19 62/4 62/7 67/11 67/15
 67/22 70/1 72/2 73/12 73/17 78/15
 78/15 82/10 91/23 95/4 95/22 98/16
 101/13 104/5 104/8 131/19 136/10
 136/11 136/14 136/18 136/22 137/13
 137/16 138/20 140/5 140/20 143/9
 144/13 144/17 145/14 146/6 147/11
 149/11 150/4 158/25 161/14 180/7
 183/24 184/18 184/24 185/6 185/25

192/18 193/3 195/25 199/21 201/1
 202/25 204/14 205/13 255/5 262/5
 269/11 270/4 273/7 274/16 275/16
 276/11 276/13 280/5 281/21 282/15
 283/25 287/5 291/25 306/7 309/3 310/2
 310/6 312/3 312/10 312/13 315/15
 315/15
 Dame's [8] 3/21 29/13 39/12 139/1
 204/7 205/1 207/7 282/24
 DAMON [4] 1/18 2/14 4/25 67/10
 Danny [1] 123/15
 date [26] 11/5 11/16 62/18 105/12
 121/4 130/2 141/23 150/4 164/23 172/6
 179/23 192/6 195/22 219/18 221/25
 222/10 247/16 248/20 252/5 285/22
 285/23 290/3 297/10 312/7 312/8
 329/15
 dated [13] 95/14 97/10 106/3 134/23
 135/14 152/12 165/16 179/11 179/11
 179/18 207/7 263/18 276/9
 dates [7] 106/1 121/6 140/22 195/19
 288/23 288/23 289/8
 dating [21] 22/17 22/18 58/10 58/12
 70/13 84/12 91/14 147/23 148/2 148/3
 161/6 166/23 167/6 176/9 193/15
 207/14 268/3 268/14 268/17 286/24
 309/9
 daughter [1] 101/5
 dawned [1] 10/15
 day [51] 2/8 12/2 12/8 13/8 36/16 36/18
 38/22 43/16 63/8 63/15 64/20 65/1
 83/13 102/19 107/23 108/1 138/7
 155/19 156/4 172/10 173/5 173/8 182/8
 220/22 222/16 233/21 234/5 239/20
 239/22 241/2 246/3 246/10 246/11
 246/11 246/12 246/12 250/18 263/20
 264/4 288/3 288/3 289/4 290/23 290/24
 297/11 299/12 311/2 313/25 322/20
 323/9 326/15
 day-to-day [1] 288/3
 days [32] 3/15 12/21 32/3 32/4 43/13
 160/12 160/13 182/24 209/13 215/18
 221/13 221/20 222/20 248/22 248/24
 252/6 258/21 261/14 273/2 289/24
 289/25 290/18 290/20 290/25 291/6
 291/6 293/13 293/14 299/10 312/7
 314/4 328/21
 de [2] 250/6 250/21
 dead [3] 11/16 232/19 250/13
 deadline [3] 164/22 252/6 291/3
 deadlines [4] 293/13 306/15 306/24
 312/4
 deal [9] 11/22 13/21 39/20 41/1 69/2
 94/5 105/1 191/18 306/15
 dealing [4] 9/1 9/2 26/17 90/14
 deals [1] 214/21
 dealt [2] 138/19 265/20
 Dean [1] 42/21
 Dear [5] 91/18 109/8 109/13 109/16
 269/9
 DeBartolo [1] 62/20
 debate [1] 230/22
 December [2] 134/23 276/18
 December 23rd [1] 276/18
 December 29 [1] 134/23
 decide [14] 28/20 33/3 33/14 33/15
 56/21 71/20 79/12 79/22 245/20 245/21
 247/14 260/4 270/24 279/25
 decided [13] 22/7 34/4 34/6 49/23
 49/25 87/17 106/9 150/17 170/3 248/17

<p>D decided... [3] 248/18 248/19 250/2 decides [1] 240/22 deciding [2] 73/10 247/12 decipher [1] 99/14 decision [76] 27/18 29/1 30/13 42/24 71/18 74/25 75/2 88/7 88/10 118/2 118/21 120/16 141/7 143/21 157/9 175/25 176/5 176/17 179/23 180/3 180/9 180/19 180/23 181/21 185/23 190/12 199/13 214/9 214/13 214/14 214/18 220/11 220/17 220/21 220/24 221/2 233/19 233/19 242/5 242/15 243/20 243/22 244/1 244/2 244/7 244/13 245/11 245/24 246/13 247/19 251/21 252/6 260/6 260/6 263/12 265/15 266/22 266/23 267/21 268/18 268/18 268/19 271/7 283/20 283/22 297/25 298/2 298/5 305/13 305/25 306/4 306/21 312/8 319/19 321/24 322/15 decision-making [1] 297/25 decisions [15] 27/15 73/3 73/4 73/6 73/7 77/16 103/5 138/25 143/20 163/23 180/5 184/14 213/16 228/13 246/4 decline [2] 74/6 253/14 declined [1] 304/5 decompress [1] 246/3 deemed [1] 250/22 deep [1] 309/6 deeply [1] 57/2 defect [9] 249/23 250/9 251/2 251/6 251/8 251/8 251/16 251/18 263/24 defects [3] 249/12 250/7 253/24 defendant [7] 1/18 2/14 217/14 217/21 217/25 218/5 332/3 Defendant's [16] 146/22 147/19 155/13 163/15 164/16 165/4 171/6 172/3 174/9 177/8 195/7 281/17 289/19 303/18 325/23 326/19 Defense [1] 275/15 defer [3] 270/19 270/24 271/14 deferring [1] 271/14 define [1] 193/11 defined [5] 148/2 148/3 148/16 235/3 295/22 defining [1] 189/14 definite [1] 103/5 definition [13] 22/11 22/12 22/16 148/12 148/15 268/10 295/7 295/11 295/13 295/14 295/15 295/17 296/8 definitions [1] 267/24 definitively [4] 58/23 59/17 261/23 293/4 deflecting [1] 90/10 degree [19] 15/4 16/21 17/1 17/14 17/19 17/23 17/25 18/9 18/10 18/15 18/24 25/2 136/23 137/21 137/23 270/19 270/24 271/24 279/1 degrees [1] 99/12 delay [5] 113/2 113/13 115/13 242/4 271/13 delayed [1] 232/10 deliberate [3] 41/1 41/18 42/7 deliberated [1] 261/15 deliberately [2] 41/9 262/15 deliberating [1] 259/7 deliberation [5] 219/24 245/15 245/20 246/14 259/8 deliberations [5] 220/6 243/10 245/23</p>	<p>259/19 268/13 demographic [1] 196/24 demographic [1] 16/24 denial [2] 242/13 263/20 denied [6] 113/12 113/23 183/9 193/17 238/21 242/11 Denise [2] 51/3 327/12 department [5] 70/21 93/15 98/16 109/21 202/12 departments [1] 149/10 DePauw [1] 16/8 depend [1] 115/11 depending [3] 10/4 125/1 181/3 depends [3] 21/14 21/16 90/20 depressed [2] 225/21 225/24 depression [4] 191/9 191/22 192/15 193/9 depth [1] 299/9 deputy [19] 69/25 70/8 70/9 72/5 73/8 114/25 121/24 122/3 128/17 136/8 136/13 139/8 149/13 190/18 192/7 206/14 206/24 207/10 240/10 describe [4] 47/17 133/12 261/1 286/6 describes [6] 26/10 153/25 154/3 188/8 189/1 287/23 describing [1] 188/16 description [1] 286/2 deserving [1] 34/5 designations [1] 322/17 designed [1] 318/24 despite [1] 170/22 detail [10] 136/20 160/18 162/18 187/14 187/14 211/18 214/15 218/15 249/6 285/19 detailed [2] 127/17 321/23 details [4] 57/1 117/7 142/12 217/19 determination [9] 38/3 73/22 87/7 88/24 107/8 122/22 155/16 265/12 307/12 determinations [1] 88/15 determine [23] 28/15 28/19 75/16 79/14 79/19 87/9 141/20 175/16 175/19 176/14 180/12 184/12 198/21 219/22 229/7 229/15 249/12 250/7 264/7 287/14 300/23 306/13 311/24 determined [15] 23/13 77/2 87/13 87/14 95/10 103/3 107/10 129/17 141/17 180/14 198/18 215/25 215/25 217/10 305/5 determines [3] 71/15 208/19 308/13 determining [10] 78/11 78/11 100/2 215/23 220/7 248/11 250/8 251/15 255/20 276/10 Detlefsen [10] 124/19 124/22 135/12 135/14 161/20 162/16 163/4 165/19 194/23 194/25 develop [2] 139/5 279/7 developing [1] 21/14 development [6] 50/4 76/5 149/18 201/14 201/20 201/21 developmental [2] 212/9 305/20 deviate [1] 308/7 diagnosis [1] 193/1 diagnostic [1] 99/20 dialogue [2] 281/11 282/4 dictate [1] 297/6 did [183] 2/7 4/14 6/7 7/17 31/15 35/8 35/9 39/18 43/14 45/21 45/24 46/4 46/11 46/11 46/19 47/4 48/9 48/12 48/13 48/16 51/18 51/20 51/20 51/20 54/14 54/16 54/17 56/8 56/21 56/24</p>	<p>59/20 62/14 63/7 63/11 63/15 63/18 63/21 64/1 64/12 64/15 64/16 64/22 64/22 66/9 66/13 68/6 68/7 75/20 75/23 77/2 86/1 86/6 92/19 92/20 92/23 93/4 93/20 93/24 94/1 94/4 94/21 94/23 96/15 96/20 98/15 98/20 100/16 101/22 103/2 103/9 103/11 103/12 107/8 110/21 111/2 116/12 120/15 120/18 127/2 127/19 127/20 128/22 128/23 128/25 129/9 133/6 135/3 135/3 137/8 137/12 137/15 142/19 154/12 154/25 155/21 156/1 156/2 156/9 160/21 161/4 170/3 176/6 179/3 179/6 182/13 183/20 183/21 183/23 184/1 191/2 191/2 192/20 193/20 193/20 194/23 194/23 195/22 197/19 197/24 211/18 213/13 213/15 219/22 220/3 223/10 224/21 224/25 225/1 227/4 229/6 229/8 237/17 238/9 238/20 239/13 244/13 244/13 245/22 247/14 248/13 254/1 254/16 255/20 257/18 258/16 259/4 259/6 262/8 262/10 262/13 264/3 264/7 268/2 268/2 268/8 268/8 268/20 276/20 288/9 288/11 290/8 290/14 290/15 291/17 292/15 292/18 293/1 293/4 297/19 299/3 299/4 299/6 308/2 309/24 311/2 311/4 311/16 311/21 315/15 318/21 318/21 320/3 328/2 didn't [65] 5/24 6/7 7/3 10/16 15/19 29/17 29/18 41/19 46/9 50/9 52/22 53/9 53/18 68/6 76/19 86/4 86/4 94/21 96/1 96/14 96/16 99/2 102/1 102/6 102/20 120/16 126/1 141/19 144/7 147/25 160/18 167/8 182/18 187/15 192/22 193/7 193/8 199/20 220/25 221/1 221/19 231/20 235/14 235/17 237/14 238/10 239/7 239/9 245/16 250/2 250/21 250/22 256/4 256/6 256/14 258/16 258/25 259/13 261/14 269/16 311/1 318/18 318/20 327/19 328/12 difference [4] 82/5 82/9 250/14 304/25 different [45] 19/24 20/16 20/19 32/17 32/21 32/25 35/21 39/6 59/13 72/15 73/14 73/18 74/15 78/14 78/15 80/16 86/24 89/15 90/20 90/22 90/24 136/24 138/4 144/15 144/18 149/25 181/5 181/13 198/4 201/11 202/11 203/2 203/3 204/12 220/21 238/23 243/17 244/15 244/25 267/3 283/15 304/14 308/16 308/19 323/20 differentiate [5] 29/9 310/6 310/8 310/11 310/14 differently [3] 36/24 295/20 295/25 difficult [6] 13/11 39/17 39/19 110/10 111/11 130/21 difficulty [1] 103/25 digital [1] 192/1 dignity [3] 234/3 280/10 282/3 dinner [1] 297/18 diploma [6] 265/6 265/8 270/16 271/4 271/14 271/25 direct [13] 10/4 44/19 61/12 69/21 168/8 200/20 234/17 275/12 279/12 330/4 330/7 330/9 330/13 directed [5] 7/5 15/5 268/5 268/5 268/8 directing [1] 115/20 direction [2] 13/25 238/23 direction that [1] 13/25 directly [7] 73/16 129/10 226/21 235/2 236/13 283/1 294/16</p>
---	---	---

<p>D</p> <p>director [17] 136/15 136/24 136/24 137/4 137/11 149/14 201/3 201/22 201/25 202/1 202/2 202/6 202/8 202/14 216/6 291/1 300/7</p> <p>directors [4] 202/13 211/4 216/4 283/5</p> <p>disabilities [3] 191/18 191/19 192/8</p> <p>disability [5] 192/10 192/21 192/23 192/23 193/2</p> <p>disadvantage [1] 312/22</p> <p>disagree [5] 232/20 234/8 318/25 319/2 319/4</p> <p>disagreement [1] 219/16</p> <p>disciplinary [16] 17/20 17/22 22/10 22/15 28/15 42/14 45/18 46/2 46/5 46/10 51/19 62/6 206/4 211/19 270/23 271/11</p> <p>discipline [3] 18/3 186/20 201/23</p> <p>disclose [1] 78/22</p> <p>discover [2] 15/22 103/2</p> <p>discovered [2] 249/14 254/10</p> <p>discovery [1] 306/17</p> <p>discretion [4] 234/13 235/18 236/24 266/10</p> <p>discretionary [1] 189/22</p> <p>discuss [12] 42/22 154/5 154/8 156/10 156/22 157/8 158/18 159/18 159/21 160/21 181/7 275/9</p> <p>discussed [10] 166/8 166/14 167/3 173/20 188/5 237/25 257/21 263/5 277/25 318/4</p> <p>discussion [15] 56/8 56/11 57/10 57/15 150/13 151/17 153/19 154/14 160/25 180/15 184/15 295/3 300/3 307/21 307/23</p> <p>discussions [4] 59/14 98/15 107/3 154/12</p> <p>disfavored [2] 27/4 28/3</p> <p>dislocate [1] 40/8</p> <p>dismiss [4] 27/18 34/6 123/9 231/4</p> <p>dismissal [15] 25/21 30/13 34/5 38/15 214/8 215/1 215/2 231/9 267/2 267/6 287/17 304/12 305/1 305/1 308/15</p> <p>dismissals [1] 34/9</p> <p>dismissed [23] 15/12 15/17 16/22 25/22 34/24 38/8 211/24 212/12 213/11 213/20 233/25 271/15 271/15 305/15 305/15 309/4 309/15 309/21 309/22 313/3 313/6 313/9 313/16</p> <p>disparate [9] 19/25 21/3 22/1 34/16 34/19 41/10 43/6 80/13 243/2</p> <p>dispute [2] 45/19 214/12</p> <p>disregard [1] 79/17</p> <p>disrespectful [1] 6/17</p> <p>disrupt [5] 9/4 231/14 231/15 231/16 292/4</p> <p>dissent [1] 221/4</p> <p>dissenting [1] 220/13</p> <p>dissents [2] 220/19 220/20</p> <p>dissipate [1] 170/3</p> <p>distinction [2] 236/5 236/6</p> <p>distinguish [1] 193/13</p> <p>distinguishable [1] 203/12</p> <p>distributed [1] 288/5</p> <p>DISTRICT [8] 1/1 1/1 1/7 21/18 21/18 21/25 21/25 329/17</p> <p>disturbing [1] 31/1</p> <p>divided [1] 210/19</p> <p>division [9] 1/2 70/25 72/14 72/15 72/16 72/17 72/18 72/24 76/2</p>	<p>do [343]</p> <p>docket [1] 83/24</p> <p>document [21] 65/13 71/23 103/6 105/18 147/11 151/15 160/6 185/20 204/5 204/6 204/9 207/8 209/6 209/8 215/8 216/21 241/18 245/10 253/7 253/9 260/12</p> <p>documentary [6] 3/4 42/4 42/9 185/1 185/3 185/17</p> <p>documentation [11] 88/3 123/16 142/23 157/23 157/25 161/25 192/22 221/10 290/14 290/17 293/9</p> <p>documented [1] 169/23</p> <p>documents [53] 3/25 4/2 4/4 4/5 4/9 4/13 4/14 30/8 30/9 95/4 95/22 97/4 111/4 112/21 133/13 133/15 144/4 159/19 174/20 209/13 210/9 210/14 210/20 214/12 215/10 215/17 216/6 216/16 221/11 221/17 221/23 222/3 222/15 222/21 222/24 243/6 243/9 243/13 243/19 245/10 249/10 253/3 266/7 288/4 288/14 288/16 288/24 289/24 290/24 291/2 291/20 311/24 316/4</p> <p>DOE [282] 1/3 2/4 2/20 2/22 2/23 2/25 6/3 6/8 7/19 7/21 8/9 9/14 12/23 14/17 14/18 16/7 20/1 20/7 21/17 22/7 22/15 23/4 23/5 23/6 23/7 24/12 25/22 27/10 30/6 30/23 31/3 33/11 34/4 34/6 34/20 35/6 36/4 37/12 38/14 41/7 42/1 42/11 43/7 45/13 45/19 51/13 56/4 56/6 56/13 56/17 58/9 58/16 58/21 59/12 59/15 60/4 62/8 62/12 63/12 67/16 67/22 68/3 87/18 92/22 92/23 94/7 94/8 94/12 94/22 95/19 95/24 96/19 98/3 98/21 99/6 101/14 101/23 102/18 102/21 102/25 107/2 111/6 113/9 113/10 113/23 117/1 117/6 117/14 117/19 123/7 124/18 126/23 127/6 127/18 129/7 129/21 130/5 133/18 134/1 135/11 135/13 135/13 140/21 142/6 142/14 142/19 143/4 145/23 146/3 146/11 150/15 151/4 151/7 151/8 151/18 152/24 153/6 153/20 154/1 154/19 155/1 155/18 156/8 156/10 156/20 156/25 157/2 157/7 157/18 158/7 158/18 159/3 159/7 159/18 160/16 160/25 161/17 162/16 163/1 163/5 163/24 165/8 165/13 166/8 166/14 167/8 167/22 168/12 169/2 169/5 170/15 173/20 173/25 174/21 175/10 177/13 178/3 178/5 178/19 179/5 181/10 182/1 182/24 183/5 187/10 190/4 194/3 194/15 194/16 195/21 197/15 197/16 197/20 198/24 199/16 200/24 206/18 207/18 208/12 211/14 213/20 215/24 216/24 217/12 218/14 221/17 224/23 225/21 227/11 235/5 236/19 237/14 237/19 239/9 240/22 241/12 243/16 243/18 247/14 248/6 248/11 248/22 249/10 252/3 253/1 253/6 253/23 255/9 256/1 256/13 256/25 257/16 257/23 258/18 259/4 259/20 259/25 260/16 261/16 262/2 262/4 263/20 266/11 266/22 268/23 273/5 274/18 274/21 275/19 275/21 284/16 284/19 284/22 285/20 286/2 286/12 286/15 287/5 287/9 287/21 288/9 288/23 289/6 290/8 290/14 290/17 291/13 291/17 292/1 292/7</p>	<p>292/15 292/23 293/21 294/7 294/13 294/25 298/13 298/15 299/22 300/13 301/4 302/1 302/10 302/25 305/16 307/16 308/20 311/20 314/17 314/17 316/21 316/24 316/25 317/10 317/24 318/12 320/3 321/19 321/21 324/4 326/8 326/9</p> <p>Doe's [22] 7/16 25/23 28/15 36/23 37/5 40/7 41/20 68/1 101/18 164/1 206/10 213/14 224/19 224/24 234/25 242/3 250/20 266/3 302/22 303/3 306/2 314/1</p> <p>does [108] 5/23 11/9 11/9 12/10 13/24 14/1 14/1 15/2 18/15 24/7 24/8 26/20 27/12 29/3 29/8 39/15 50/2 55/12 60/13 65/7 72/9 73/1 75/10 76/12 99/21 101/8 105/11 105/12 108/21 112/13 118/10 118/21 120/6 126/4 126/5 126/8 130/16 130/18 140/18 143/3 144/6 147/7 150/4 151/6 158/25 158/25 159/13 165/24 175/11 177/21 178/5 178/19 180/9 181/11 181/23 183/11 183/14 184/8 184/18 185/17 185/18 185/25 190/2 193/3 193/11 193/13 195/23 209/25 210/18 210/18 210/19 214/23 216/5 218/22 220/13 220/14 224/15 226/14 229/9 229/16 231/8 247/22 265/2 280/6 287/21 288/22 291/25 294/13 296/21 297/25 302/6 305/2 307/3 307/8 307/24 307/24 310/6 310/8 310/11 310/14 311/13 311/25 311/25 312/4 317/7 322/24 323/15 327/18</p> <p>doesn't [41] 6/15 10/21 58/7 58/14 75/11 80/3 101/15 106/15 110/12 130/25 169/6 181/2 184/11 184/12 189/25 195/16 195/21 207/17 208/16 210/21 213/11 214/3 214/13 217/24 220/16 226/11 233/2 239/25 240/1 241/1 255/5 255/11 255/22 261/3 263/23 265/16 269/11 282/9 289/5 292/4 317/8</p> <p>doing [22] 41/9 62/21 63/5 81/17 82/2 89/10 94/13 95/25 111/24 112/9 126/14 149/21 178/11 204/20 205/21 209/21 211/7 227/5 227/6 247/2 272/5 273/22</p> <p>domestic [5] 70/14 84/13 91/14 166/23 207/14</p> <p>dominate [1] 30/22</p> <p>don't [220] 2/7 3/11 5/9 6/16 10/10 11/19 12/5 12/16 14/2 16/9 19/20 20/21 21/1 25/19 31/11 32/11 34/11 35/12 35/14 35/24 46/7 46/7 46/8 46/14 52/22 54/6 54/10 54/11 54/13 54/19 54/20 55/7 59/6 59/10 59/21 62/18 65/22 66/20 68/16 71/1 71/18 72/10 75/10 81/10 84/23 85/14 88/9 88/21 90/9 91/6 94/2 95/25 96/2 96/10 96/24 97/1 97/3 97/14 97/14 98/19 100/11 100/13 103/5 103/17 105/1 105/13 109/2 109/5 109/15 110/18 111/3 111/8 112/4 112/4 113/10 113/11 113/24 114/13 114/23 115/16 116/3 116/6 119/2 119/4 119/4 120/1 120/20 123/11 125/10 128/12 129/3 131/10 132/2 132/15 132/22 136/20 140/13 140/22 143/20 146/6 151/15 153/18 155/5 162/9 169/4 169/22 170/13 171/14 172/14 172/16 176/5 188/9 189/15 189/24 190/1 190/10 190/16 191/4 192/3 192/5 192/5 195/1 195/3 195/19 196/15 197/7 199/6 199/6 200/1 208/18 209/14 212/6</p>
--	--	--

D
 don't... [88] 213/25 213/25 214/1 215/1
 216/21 218/3 219/20 220/15 220/6
 220/22 220/24 221/22 222/7 223/4
 224/13 226/23 228/14 228/24 228/25
 229/12 229/14 229/14 231/25 232/19
 233/7 233/17 233/23 234/8 236/5 236/6
 237/21 238/3 238/12 239/17 241/19
 241/24 245/24 246/12 247/16 248/20
 248/25 250/13 251/17 251/19 251/25
 254/13 256/1 256/2 257/4 258/2 261/22
 262/24 266/5 266/23 267/11 269/23
 271/8 271/16 273/5 275/4 275/7 277/6
 278/23 278/24 280/3 285/2 288/5
 288/17 298/3 298/21 300/18 300/21
 303/5 304/23 305/10 308/7 312/22
 316/14 317/14 319/13 320/6 321/22
 322/9 322/19 323/9 325/8 326/4 327/6
 done [29] 4/11 10/15 10/16 10/17 12/5
 18/13 39/17 40/22 56/23 65/3 66/18
 112/11 118/10 119/16 125/11 144/3
 174/18 192/7 211/16 214/21 220/3
 244/14 258/15 265/25 266/2 269/4
 282/15 284/23 322/16
 doors [1] 6/11
 dotted [1] 72/19
 double [3] 90/5 146/12 149/8
 double-check [3] 90/5 146/12 149/8
 doubt [3] 30/24 32/13 273/5
 dovetail [1] 296/22
 down [33] 4/13 40/4 49/23 63/9 71/9
 73/24 76/15 78/18 90/16 92/3 95/13
 104/3 110/4 121/8 121/17 128/3 157/17
 159/9 165/11 166/1 181/6 199/25
 201/16 201/17 207/12 227/2 246/12
 256/22 298/25 300/21 317/13 321/12
 326/25
 downloaded [1] 72/1
 Dr [1] 76/3
 Dr. [17] 94/12 96/21 99/4 151/8 152/9
 152/19 152/23 153/5 153/20 154/12
 154/25 169/23 169/25 170/6 172/20
 194/18 195/4
 Dr. Bill [2] 94/12 151/8
 Dr. Stackman [13] 96/21 99/4 152/19
 152/23 153/5 153/20 154/12 154/25
 169/23 169/25 170/6 194/18 195/4
 Dr. Stackman's [1] 172/20
 Dr. William [1] 152/9
 draft [3] 204/10 244/13 244/14
 draw [4] 207/12 223/21 263/4 315/10
 drift [2] 171/16 171/20
 drink [3] 52/19 52/21 53/4
 drinking [7] 47/19 48/22 52/14 52/16
 52/17 52/20 53/1
 drive [5] 48/23 210/23 211/1 313/7
 328/10
 driving [3] 44/12 52/23 245/2
 Drohosky [3] 329/12 329/16 329/16
 drop [1] 11/16
 drove [1] 297/1
 drugs [1] 219/5
 drunk [4] 48/3 49/1 50/17 50/20
 drunken [1] 228/11
 du [52] 29/10 30/19 31/7 31/14 33/4
 33/17 33/23 113/25 114/1 117/21 140/5
 140/6 142/22 143/3 144/14 144/22
 144/25 145/6 145/9 147/3 149/1 149/3
 149/4 149/21 176/2 202/17 203/7
 203/23 204/9 205/2 205/3 224/11 263/1

270/10 271/13 275/16 279/7 279/13
 280/4 280/6 280/25 282/16 287/5
 289/23 290/21 293/19 295/5 295/18
 295/15 296/10 308/11 312/11
 du lac [2] 149/3 295/5
 due [1] 250/25
 Duke [1] 282/20
 dump [1] 215/17
 Dunn [1] 277/13
 duplicate [1] 164/14
 during [26] 42/14 110/16 142/8 157/13
 158/7 166/9 166/14 167/4 167/13
 167/14 189/18 189/21 195/5 195/18
 199/17 225/10 225/13 225/21 227/10
 234/17 239/18 246/22 277/25 289/8
 296/25 324/2
 dust [2] 3/8 35/23
 dust-up [1] 3/8
 duties [1] 70/8
 DVD [1] 171/18

E
 e-mail [83] 7/16 7/18 7/25 65/4 65/14
 65/17 76/13 95/14 95/24 95/25 96/5
 96/7 96/10 97/13 97/14 97/15 97/19
 97/21 97/21 98/4 100/20 101/2 101/7
 102/12 105/19 106/23 107/18 107/21
 108/15 111/17 112/6 112/11 112/17
 113/16 115/18 116/13 116/17 119/22
 120/25 121/9 121/13 121/18 123/4
 123/18 128/4 128/12 128/13 128/21
 129/7 129/11 130/11 134/16 134/17
 134/21 134/25 135/10 135/11 135/13
 152/10 152/12 152/16 153/3 153/18
 153/20 155/22 169/23 172/20 182/23
 185/15 197/15 197/16 197/22 197/24
 241/5 241/11 241/25 260/15 261/1
 284/25 287/24 288/11 314/25 328/6
 e-mailed [1] 327/22
 e-mailing [2] 65/15 65/16
 e-mails [26] 97/7 100/22 107/24 108/1
 111/1 111/5 123/13 130/8 131/17
 131/21 133/15 135/9 151/10 151/25
 152/23 155/23 178/22 183/2 183/17
 183/20 184/1 193/22 193/23 194/22
 197/12 291/4
 each [29] 9/19 9/21 14/16 168/10
 172/11 203/12 204/18 204/20 204/25
 205/5 205/14 211/3 215/8 231/1 234/4
 234/17 236/1 236/3 236/14 255/8
 260/17 260/20 266/12 267/12 267/12
 267/15 267/21 282/3 309/13
 ear [1] 41/13
 earlier [23] 21/17 22/24 59/11 75/4
 120/25 126/17 130/1 184/7 197/5
 197/12 199/4 211/11 224/16 230/15
 230/23 260/4 280/7 281/25 283/9 294/6
 295/3 314/1 314/7
 early [2] 178/21 299/13
 easier [4] 10/24 33/19 173/23 260/13
 easily [1] 144/25
 Easter [1] 182/11
 Eastern [1] 279/2
 easy [1] 36/1
 Eaton [14] 97/22 97/24 97/25 98/20
 123/21 123/22 124/25 134/16 134/18
 134/22 135/9 154/15 194/23 194/24
 echoing [1] 230/22
 echos [1] 230/15
 educate [2] 74/16 202/20

educated [1] 294/2
 education [16] 31/13 80/11 80/15 80/17
 88/13 109/21 136/17 136/22 137/3
 138/17 232/23 272/13 279/2 279/3
 283/16 301/10
 educational [21] 137/19 202/19 211/20
 211/23 212/1 212/2 212/3 212/9 230/21
 230/23 231/4 232/21 233/5 233/8 234/1
 240/14 278/24 279/4 281/11 282/1
 282/8
 effect [6] 18/11 37/25 38/2 38/9 40/11
 213/10
 effective [3] 6/20 37/25 192/3
 efficiency [1] 149/24
 efficient [9] 5/18 6/19 7/2 8/14 132/20
 273/18 273/20 274/23 278/20
 effort [4] 152/25 154/22 279/24 279/24
 efforts [1] 4/7
 egregious [3] 75/8 233/23 305/3
 eight [17] 89/16 101/19 134/16 149/8
 149/9 159/9 159/25 174/17 188/6 188/8
 188/15 188/25 189/1 215/13 215/20
 284/14 287/24
 eight inches [2] 215/13 215/20
 eight-week [1] 101/19
 EILEEN [2] 1/19 2/16
 either [33] 5/6 22/11 40/17 55/17 74/23
 96/13 98/3 99/4 142/23 161/13 170/15
 170/16 170/21 170/23 174/21 174/21
 186/19 216/3 222/3 223/1 225/9 230/7
 249/12 264/8 264/15 272/13 272/22
 272/22 288/25 308/25 309/18 311/15
 312/4
 elect [3] 159/1 159/2 293/1
 elected [3] 159/3 293/6 299/22
 electronic [1] 203/17
 electronically [4] 210/19 285/21 286/12
 298/7
 element [4] 14/16 22/14 38/21 257/10
 elements [1] 26/14
 eleven [1] 14/7
 elicit [1] 55/7
 eligible [2] 18/14 297/13
 ELMO [6] 65/5 140/10 162/2 163/18
 163/20 276/7
 else [16] 5/9 16/17 25/25 39/24 55/4
 60/9 68/9 87/21 87/22 99/4 137/15
 151/6 157/7 244/14 264/12 327/3
 else's [1] 46/19
 emerging [1] 270/3
 emotional [1] 246/4
 emotions [1] 107/6
 employed [1] 218/25
 employees [3] 6/20 7/4 78/15
 employer [1] 272/23
 employment [2] 136/18 278/23
 encompassed [1] 268/4
 encompasses [1] 117/15
 encounter [1] 53/19
 encourage [1] 127/20
 encouraged [1] 127/6
 end [30] 6/4 6/15 11/9 12/9 12/20 12/23
 15/12 18/13 27/14 38/22 61/21 64/10
 75/10 91/7 138/23 220/22 231/2 233/21
 234/5 247/2 248/14 261/12 271/23
 297/12 322/20 323/9 326/15 327/5
 328/22 329/10
 ending [1] 307/19
 ends [2] 24/18 284/24
 enforce [1] 27/18

<p>E enforced [1] 103/5 enforcement [2] 40/15 86/18 engage [6] 228/18 234/16 255/22 281/11 297/19 318/21 engaged [12] 99/14 100/9 190/22 214/4 214/5 217/16 225/22 231/5 231/7 232/5 233/6 266/25 engages [2] 266/21 282/4 engaging [3] 148/17 259/25 261/21 enjoin [2] 40/10 40/10 enjoining [2] 26/21 26/22 enough [34] 37/1 52/22 52/23 67/6 84/23 133/22 173/2 213/3 222/16 223/22 233/23 234/9 249/2 249/13 249/14 249/19 250/10 250/17 250/22 251/3 251/5 251/13 266/16 267/2 267/8 267/17 267/18 288/17 303/9 303/9 303/10 305/3 318/20 322/24 enrolled [1] 271/8 enrollment [1] 282/20 ensure [8] 48/15 213/1 246/16 282/6 285/6 288/17 299/16 308/6 entail [1] 286/3 enter [2] 3/7 326/11 entering [1] 37/22 enters [1] 169/8 entire [8] 51/16 53/12 53/16 138/22 157/11 292/21 309/12 311/13 entirely [2] 32/20 42/23 entirety [1] 207/9 entities [2] 279/15 283/2 entitled [7] 6/17 16/25 17/7 145/19 158/4 158/4 329/14 entrance [1] 49/19 entries [1] 196/13 entry [1] 288/14 environment [6] 84/18 166/25 168/10 207/16 234/2 273/1 equal [3] 80/12 82/5 219/21 equally [2] 30/14 34/2 equitable [4] 40/24 82/5 205/19 206/6 equitably [1] 276/21 erase [1] 15/11 erroneous [1] 40/14 especially [4] 89/24 91/8 118/17 269/20 essentially [7] 30/12 66/23 91/4 168/5 321/23 324/24 325/3 established [1] 235/19 estimate [1] 54/22 et [3] 260/1 282/20 283/6 ethics [1] 233/10 ethos [1] 281/1 evaluate [16] 12/22 13/7 34/19 37/11 100/9 119/1 228/24 256/15 264/3 264/10 266/21 287/12 307/8 324/16 325/12 325/13 evaluating [2] 142/24 255/20 evaluation [1] 241/1 even [21] 10/16 11/19 12/8 14/23 15/3 19/9 25/4 29/17 29/18 33/11 38/21 62/22 63/6 82/20 115/1 173/4 224/17 243/8 249/3 317/1 327/24 evening [5] 3/23 3/23 5/5 7/17 48/2 event [3] 3/10 263/5 263/8 events [2] 202/5 202/6 eventually [6] 47/20 47/21 48/25 139/8 208/9 208/21 ever [20] 30/13 34/13 62/14 64/12 66/9 66/13 116/8 143/24 144/6 149/1 150/3</p>	<p>183/8 204/9 219/15 238/13 251/19 253/14 282/24 313/2 320/3 evolving [1] 150/3 every [22] 12/24 17/7 17/21 30/4 30/4 38/6 38/8 53/24 83/12 145/15 147/6 149/23 149/25 213/23 215/8 218/19 220/17 244/7 246/17 246/18 269/1 280/10 everybody [11] 2/10 2/11 11/25 20/17 21/1 44/5 69/19 133/5 202/18 243/3 288/18 everybody's [1] 219/21 everyday [1] 124/3 everyone's [1] 322/4 everything [11] 2/9 4/10 6/9 16/17 49/20 104/24 157/21 219/21 322/13 323/3 326/22 evidence [62] 3/4 13/8 28/9 29/19 30/1 30/18 30/25 31/1 31/2 32/20 33/12 33/22 34/3 34/6 36/3 37/16 39/12 68/21 115/1 127/2 127/20 132/5 132/11 134/13 135/22 146/23 147/20 155/14 163/16 164/12 164/17 165/5 171/7 172/4 174/10 177/9 227/20 249/14 254/10 257/14 267/8 267/9 278/6 281/18 287/13 289/20 303/19 308/13 317/20 317/25 319/1 320/8 320/22 321/3 321/10 324/10 325/24 326/11 326/21 326/23 331/1 332/1 evolving [6] 21/10 21/11 41/15 41/17 150/3 269/19 exact [11] 59/6 62/18 179/23 215/21 248/20 276/16 277/6 289/1 290/12 295/23 295/24 exactly [6] 40/24 63/4 109/3 207/18 251/25 295/12 exaggerate [2] 256/18 256/24 exam [12] 11/8 11/12 11/17 12/9 12/24 15/2 15/15 24/13 24/16 119/15 119/15 328/22 examination [30] 44/19 52/7 59/1 61/12 67/8 69/21 132/23 136/1 187/5 198/14 200/20 275/12 277/23 277/25 278/15 312/19 320/1 330/4 330/4 330/5 330/7 330/7 330/9 330/10 330/10 330/11 330/13 330/13 330/14 330/14 example [13] 21/24 79/4 99/15 118/4 187/17 188/5 195/17 251/10 271/19 301/11 312/21 313/8 316/6 examples [2] 313/7 313/12 exams [19] 11/5 14/18 15/9 15/20 15/23 16/16 16/17 16/23 17/13 18/20 23/21 24/8 25/25 27/24 183/3 264/25 271/2 271/9 328/23 exceedingly [1] 130/21 Excel [1] 196/19 excellent [1] 29/4 except [1] 229/22 exceptions [1] 308/7 excessive [1] 99/15 exchange [4] 134/22 134/25 316/8 316/23 exchanged [1] 241/17 excuse [5] 4/24 188/21 220/1 240/11 313/5 Executive [1] 76/6 exhibit [191] 91/23 95/1 95/12 95/23 95/24 96/9 97/7 100/23 102/11 104/3 105/8 105/19 106/18 107/13 107/17 108/9 110/2 110/24 111/15 112/5</p>	<p>112/16 113/15 114/1 115/17 116/24 119/12 120/2 120/23 121/11 123/3 123/11 126/4 128/2 128/5 128/20 129/4 131/13 131/17 132/4 132/10 133/9 133/12 134/7 134/10 134/12 135/21 140/11 145/3 146/18 146/22 147/15 147/19 151/9 151/25 155/7 155/12 155/13 156/18 162/2 162/13 163/11 163/15 163/19 163/22 163/25 164/11 164/14 164/16 164/19 165/4 165/7 171/2 171/6 171/19 171/22 171/23 171/24 172/2 172/3 173/12 173/14 174/9 175/6 175/6 175/14 175/23 177/4 177/8 177/13 179/11 179/18 195/6 195/7 197/14 203/9 204/4 206/17 207/2 207/7 209/5 216/20 218/14 223/14 241/4 243/25 252/7 252/8 252/23 252/23 253/6 254/24 260/12 263/1 275/15 275/15 276/6 276/7 276/8 278/4 280/22 281/13 281/17 285/11 285/13 285/14 288/20 289/12 289/19 291/11 296/3 300/2 303/14 303/15 303/18 314/15 315/4 315/6 315/21 315/21 316/2 319/11 320/10 320/17 320/21 320/23 321/2 321/4 321/9 325/19 325/20 325/23 326/5 326/5 326/19 331/4 331/5 331/6 331/7 331/8 331/9 331/10 331/11 331/12 331/13 331/14 331/15 331/16 331/17 331/18 331/19 331/20 332/4 332/5 332/6 332/7 332/8 332/9 332/10 332/11 332/12 332/13 332/14 332/15 332/16 332/17 332/18 332/19 332/20 332/21 332/22 332/23 Exhibit 1 [2] 203/9 263/1 Exhibit 10 [1] 254/24 Exhibit 100 [2] 280/22 281/13 Exhibit 101 [2] 145/3 146/18 Exhibit 103 [2] 288/20 289/12 Exhibit 104 [3] 151/9 155/7 155/12 Exhibit 105 [2] 285/13 291/11 Exhibit 107 [4] 147/15 156/18 285/11 296/3 Exhibit 111 [3] 171/23 171/24 172/2 Exhibit 115 [3] 163/19 163/22 164/11 Exhibit 116 [1] 164/19 Exhibit 118 [3] 165/7 171/2 207/7 Exhibit 119 [3] 162/2 162/13 163/11 Exhibit 12 [4] 252/7 252/8 252/23 252/23 Exhibit 121 [3] 140/11 195/7 275/15 Exhibit 123 [7] 175/6 175/14 175/23 177/4 177/13 179/11 179/18 Exhibit 13 [1] 253/6 Exhibit 131 [1] 326/5 Exhibit 132 [2] 173/12 173/14 Exhibit 138 [2] 300/2 303/14 Exhibit 14 [2] 315/6 320/23 Exhibit 141 [1] 325/20 Exhibit 146 [1] 326/5 Exhibit 15 [2] 276/7 276/8 Exhibit 16 [3] 314/15 315/21 321/4 Exhibit 17 [4] 316/2 319/11 320/10 320/17 Exhibit 2 [3] 204/4 206/17 207/2 Exhibit 20 [2] 91/23 96/9 Exhibit 21 [3] 95/1 95/23 195/6 Exhibit 22 [1] 95/12 Exhibit 23 [1] 97/7 Exhibit 24 [1] 100/23 Exhibit 25 [1] 102/11</p>
--	---	---

<p>E</p> <p>Exhibit 26 [2] 104/3 105/8 Exhibit 27 [1] 106/19 Exhibit 28 [1] 106/18 Exhibit 29 [1] 107/17 Exhibit 30 [1] 108/9 Exhibit 31 [1] 110/2 Exhibit 32 [1] 110/24 Exhibit 33 [1] 111/15 Exhibit 34 [1] 112/5 Exhibit 35 [1] 112/16 Exhibit 36 [1] 113/15 Exhibit 37 [1] 114/1 Exhibit 38 [1] 115/17 Exhibit 39 [1] 116/24 Exhibit 4 [1] 209/5 Exhibit 40 [1] 119/12 Exhibit 41 [1] 120/2 Exhibit 42 [1] 120/23 Exhibit 43 [2] 121/11 123/3 Exhibit 44 [1] 123/12 Exhibit 45 [1] 128/2 Exhibit 46 [2] 128/20 129/4 Exhibit 47 [6] 131/17 133/9 133/12 134/10 197/14 260/12 Exhibit 5 [2] 216/20 218/14 Exhibit 7 [1] 223/14 Exhibit 8 [1] 241/4 Exhibit 9 [1] 243/25 exhibits [14] 132/5 132/8 134/15 135/17 136/6 142/12 274/19 277/23 277/25 322/6 327/13 329/7 331/1 332/1 Exhibits 20 [1] 132/5 expect [2] 213/1 280/16 expectation [1] 145/17 expectations [14] 28/17 139/6 144/19 145/11 145/18 202/21 205/18 213/1 280/14 280/14 280/15 281/10 282/6 305/22 expected [6] 31/21 33/2 124/24 204/24 283/13 285/9 expecting [1] 3/12 expedited [2] 15/10 15/21 expel [1] 186/20 expelled [4] 232/9 266/19 267/10 267/19 experience [5] 114/16 136/22 157/12 157/12 232/1 experienced [2] 20/1 106/24 experiencing [1] 257/11 expert [1] 100/8 expertise [1] 149/11 explain [9] 16/12 161/8 232/18 256/22 272/22 281/24 285/1 287/6 298/5 explained [1] 268/23 explaining [1] 106/24 explanation [1] 168/2 explicitly [2] 128/25 157/13 exploitations [1] 107/5 explore [3] 11/4 178/15 205/20 explored [1] 317/16 expulsion [1] 213/22 extended [1] 221/15 extending [1] 113/11 extension [1] 113/1 extensive [2] 204/8 204/18 extent [9] 6/14 32/6 33/7 60/21 187/24 218/10 227/21 315/16 317/9 extenuating [2] 114/8 218/24 external [2] 184/9 185/23</p>	<p>extra [4] 27/21 98/14 188/11 328/21 extract [3] 237/15 238/15 316/2 extracted [2] 240/24 240/25 extraordinary [5] 27/6 27/21 28/5 37/22 40/6 extremely [2] 39/12 110/10 eye [1] 207/12</p> <hr/> <p>F</p> <p>F.3d [1] 26/8 F.3rd [1] 26/5 face [2] 75/8 294/3 faced [2] 161/2 211/14 facilitate [1] 124/2 facilitation [1] 144/20 facilities [4] 201/24 202/1 202/4 273/24 facing [3] 49/19 212/17 227/18 fact [45] 18/21 20/12 24/19 25/6 26/21 28/24 31/18 33/11 34/8 34/24 34/25 37/12 38/4 38/14 58/16 60/23 75/19 81/12 82/20 101/13 101/22 101/23 102/20 142/19 150/3 156/1 156/14 221/15 227/4 233/9 237/6 237/8 238/14 241/15 258/18 261/25 270/19 275/24 290/8 292/15 293/20 306/11 306/18 317/20 317/25 factor [8] 18/25 77/22 77/23 80/13 99/22 118/14 120/16 191/15 factors [7] 23/13 26/12 75/16 76/16 76/21 78/1 304/14 facts [9] 28/19 30/24 32/12 33/14 33/16 208/16 208/18 218/16 227/19 factual [3] 37/18 42/22 42/23 factually [1] 37/16 faculty [11] 110/6 110/12 110/25 111/14 111/16 111/21 112/4 128/11 183/7 243/2 252/2 failed [1] 43/2 fair [38] 31/17 35/8 35/10 37/1 37/8 40/23 60/1 67/6 80/7 81/8 81/10 81/18 81/25 82/3 115/1 115/13 119/21 120/9 122/1 127/23 129/24 133/22 173/2 182/16 188/7 203/24 204/25 205/2 205/13 205/16 205/17 205/19 205/22 206/7 213/3 221/11 234/9 283/25 fairly [5] 19/19 27/2 38/24 119/21 210/10 fairness [4] 20/10 31/13 39/16 114/18 faith [2] 28/10 81/5 fall [9] 61/20 62/10 109/13 138/7 201/6 203/5 205/3 224/25 226/2 false [5] 47/9 48/12 48/13 103/2 262/15 familiar [13] 100/14 114/1 123/6 179/1 184/16 207/8 209/6 230/4 230/6 241/18 253/2 253/8 254/6 familiarize [1] 74/2 family [3] 137/11 186/2 310/9 far [3] 55/14 55/15 204/16 farcical [2] 130/19 131/10 farther [2] 80/4 181/6 fault [3] 116/21 120/13 301/15 favor [1] 42/25 favorably [1] 21/22 feasibly [1] 306/23 featured [1] 42/8 February [48] 23/5 36/11 43/8 43/9 43/17 45/25 64/2 65/25 95/14 126/21 130/5 142/10 177/22 178/22 179/11 179/18 180/1 197/15 207/25 209/4 215/24 218/14 221/25 245/17 257/23</p>	<p>257/23 258/20 259/19 259/21 260/15 263/14 266/3 275/19 275/20 275/25 276/4 285/2 285/21 288/2 290/4 290/7 290/16 293/23 293/25 314/1 314/16 315/1 321/4 February 10 [2] 293/23 293/25 February 12th [1] 45/25 February 13 [3] 218/14 275/19 285/21 February 13th [6] 207/25 215/24 275/20 275/25 276/4 285/2 February 20th [3] 221/25 290/7 290/16 February 22 [1] 289/2 February 24 [1] 290/4 February 24th [6] 65/25 245/17 257/23 259/19 263/14 315/1 February 3 [10] 43/8 43/9 95/14 197/15 257/23 258/20 259/21 260/15 266/3 314/1 February 5 [1] 179/18 February 5th [1] 209/4 February 9 [2] 314/16 321/4 federal [12] 27/15 38/6 269/13 269/14 279/22 282/5 283/13 306/15 306/18 306/18 306/20 312/2 fee [1] 202/4 feedback [7] 101/25 279/15 279/16 279/17 279/23 279/25 296/13 feel [15] 48/9 52/22 56/25 100/20 104/21 148/19 148/20 219/17 219/17 226/23 226/24 257/6 261/5 282/9 304/19 feeling [3] 108/4 258/18 260/24 feels [2] 118/14 212/7 feet [2] 103/15 104/23 fellow [1] 262/10 felt [7] 41/12 94/15 109/24 109/25 110/9 127/7 150/16 female [18] 19/25 21/3 21/21 22/2 29/6 34/25 38/25 41/12 42/6 42/17 42/25 43/2 80/22 178/24 276/19 309/19 309/20 309/22 females [1] 197/10 few [17] 3/14 4/5 32/8 32/8 40/2 52/12 100/22 136/6 158/14 191/16 202/11 230/15 273/17 283/12 297/17 299/21 321/25 field [3] 239/25 283/18 301/10 Fifty [6] 134/21 134/22 134/25 135/6 135/10 135/11 Fifty-four [1] 135/11 Fifty-one [1] 134/22 Fifty-seven [1] 134/25 Fifty-three [1] 135/10 Fifty-two [1] 135/6 figure [4] 98/23 114/22 127/25 241/7 figured [3] 5/10 5/25 14/11 file [20] 74/14 133/14 133/16 168/22 174/24 176/22 206/19 206/20 210/18 244/16 245/12 248/24 250/1 253/13 264/19 299/3 307/15 309/12 321/6 323/10 filed [9] 36/14 37/10 37/10 252/3 252/11 253/18 309/10 309/11 320/6 files [1] 210/24 filing [4] 129/7 129/12 134/5 323/11 filings [1] 3/1 fill [1] 251/23 fills [1] 84/18 film [2] 53/18 184/18 filmed [3] 46/4 53/12 260/22</p>
--	--	---

F
 filming [1] 48/1
 final [9] 14/13 22/6 19/15 19/15
 170/21 175/25 199/13 215/15 308/17
 finally [5] 43/6 198/17 247/18 315/20
 315/20
 find [20] 11/22 23/16 120/15 120/18
 127/19 167/17 170/6 175/22 187/13
 190/13 194/24 207/13 240/9 267/21
 267/25 269/23 279/7 282/16 286/13
 318/18
 finding [9] 67/21 221/1 245/21 248/19
 267/13 267/15 283/23 287/16 318/22
 findings [3] 126/6 214/16 214/22
 fine [12] 14/8 51/4 78/9 209/3 209/23
 241/22 273/25 301/19 322/25 323/12
 323/14 326/16
 finger [1] 248/10
 finish [1] 271/3
 finished [4] 17/10 180/9 264/25 270/22
 firm [1] 230/1
 firm/organization [1] 230/1
 firmly [1] 41/25
 first [43] 3/19 7/24 8/10 9/10 19/9 24/11
 25/19 40/2 46/12 51/15 62/17 77/23
 92/13 97/13 101/9 104/20 117/11 118/7
 130/13 134/25 139/10 146/1 146/13
 152/9 167/9 167/13 179/12 179/17
 181/18 188/25 205/15 215/15 215/17
 219/11 230/15 237/18 238/24 239/15
 242/5 252/15 285/23 291/15 324/12
 firsthand [1] 225/16
 fish [1] 32/17
 fit [1] 172/9
 fits [1] 20/12
 five [20] 10/3 89/14 126/15 128/6
 136/12 138/4 140/8 149/8 194/24 200/2
 201/6 211/3 213/9 215/6 235/11 235/14
 273/22 287/24 289/5 319/7
 five-and-a-half [2] 136/12 289/5
 five-minute [1] 273/22
 fixed [1] 122/25
 flags [2] 299/14 299/16
 flavor [1] 83/22
 fleminated [1] 231/25
 flex [1] 186/15
 flexibility [1] 186/17
 flip [9] 35/21 41/10 92/1 92/9 95/1
 151/24 242/3 255/4 318/21
 floating [1] 222/1
 floor [5] 50/7 50/7 50/9 50/10 62/20
 Florida [4] 23/25 24/1 25/1 25/2
 flow [1] 292/4
 flowchart [2] 173/15 173/25
 fly [6] 10/14 11/25 64/20 66/2 327/14
 328/12
 focus [6] 14/15 25/6 223/24 229/5
 229/7 229/7
 focused [3] 19/24 230/6 275/22
 fold [1] 154/3
 folks [6] 14/6 43/22 65/23 73/18 100/12
 173/22
 follow [18] 29/24 39/13 48/7 109/25
 144/19 156/5 167/1 182/23 185/8
 198/12 204/24 226/7 228/1 259/1
 278/20 285/9 286/7 308/6
 follow-up [3] 144/19 182/23 278/20
 followed [10] 30/20 31/12 39/1 140/20
 141/14 182/9 183/23 219/9 242/12
 308/3

following [18] 2/1 12/7 22/8 24/8 44/2
 69/6 109/3 110/5 133/1 165/13 168/2
 182/5 182/6 200/5 216/25 228/17 274/2
 329/4
 follows [11] 2/2 30/4 44/3 69/7 133/2
 180/7 185/25 200/6 249/4 274/3 281/21
 foot [2] 105/9 215/13
 forecasted [1] 168/1
 forefront [2] 26/10 26/16
 foregoing [1] 329/12
 foregone [1] 216/10
 forever [3] 15/23 16/12 272/21
 Forget [1] 247/12
 form [4] 175/14 251/22 261/5 328/6
 formal [7] 36/13 37/5 43/7 91/5 91/16
 96/6 286/5
 formally [2] 68/7 69/3
 format [2] 203/17 204/10
 formative [2] 212/10 305/20
 formatting [1] 255/3
 former [9] 55/25 56/11 56/15 57/12
 57/16 57/20 58/17 58/22 73/8
 forms [1] 153/12
 formulate [1] 88/12
 forth [8] 32/19 67/2 130/4 130/24
 236/11 247/19 265/20 307/20
 Forty [3] 128/6 134/16 134/17
 Forty-eight [1] 134/16
 Forty-five [1] 128/6
 Forty-nine [1] 134/17
 forward [60] 3/5 15/22 22/1 23/9 23/15
 23/18 27/13 44/11 61/4 69/13 75/13
 75/14 75/21 76/12 76/20 77/8 79/18
 79/21 79/23 80/1 84/23 85/11 85/15
 86/1 86/1 86/2 86/9 87/16 87/17 88/5
 88/10 88/11 88/22 89/7 90/6 90/24
 93/10 106/10 106/12 106/14 106/15
 118/17 119/1 134/24 139/24 141/19
 142/7 150/1 150/20 170/4 175/16
 175/19 175/21 184/12 184/13 212/9
 221/25 222/1 260/9 276/10
 forwarded [10] 97/21 105/22 118/6
 162/1 179/5 215/10 259/23 307/17
 309/13 314/12
 forwarding [1] 121/13
 foul [1] 266/18
 found [17] 22/9 28/21 49/23 127/16
 170/23 211/15 214/21 232/4 233/9
 247/15 267/5 267/20 268/23 308/11
 308/14 308/25 310/4
 foundation [2] 41/25 216/11
 foundational [1] 172/5
 founded [1] 267/13
 four [27] 31/7 135/11 160/11 203/2
 203/3 213/9 215/16 215/18 221/13
 222/16 235/14 241/2 244/25 247/15
 266/11 266/16 267/6 269/4 275/21
 281/12 289/24 293/13 293/14 294/22
 299/13 308/11 308/13
 four inches [1] 215/16
 four o'clock [1] 299/13
 four-day [1] 222/16
 fourth [5] 77/22 167/22 267/7 267/12
 290/23
 frame [2] 80/5 172/16
 frames [1] 79/2
 framework [4] 22/22 190/24 211/17
 234/22
 frankly [10] 4/21 5/18 7/2 10/14 21/12
 21/15 24/20 82/11 225/4 327/23

frantic [1] 62/24
 free [1] 60/17
 free [6] 12/3
 freezing [2] 38/2 38/2
 frequently [2] 89/24 240/18
 freshman [7] 30/15 45/1 61/20 144/14
 186/9 186/18 310/15
 freshmen [1] 33/5
 Friday [10] 12/3 65/21 65/25 182/6
 182/11 221/21 278/19 290/4 293/23
 310/25
 friend [13] 47/19 47/22 48/25 49/2 49/3
 49/12 49/12 49/13 49/13 49/23 233/3
 255/21 262/3
 friend's [1] 48/19
 friendly [1] 163/21
 friends [2] 106/25 238/2
 frightened [3] 148/19 148/21 256/24
 frivolous [4] 257/15 257/25 258/5
 258/19
 front [8] 26/5 30/22 39/9 92/9 140/23
 188/9 231/2 326/24
 frozen [1] 27/13
 fudge [1] 11/22
 full [12] 13/15 23/10 33/6 241/16 247/1
 250/19 250/23 270/20 291/15 311/15
 312/22 315/16
 full-blown [1] 13/15
 fuller [4] 250/21 311/11 315/7 316/5
 fully [4] 30/6 39/19 170/7 326/24
 function [4] 122/9 162/18 190/7 202/11
 functions [1] 202/11
 fundamental [2] 20/9 27/9
 fundamentally [1] 20/6
 further [18] 42/19 66/7 68/10 73/2
 73/23 78/7 79/13 87/20 104/8 105/24
 122/12 143/16 154/5 166/1 176/25
 198/10 198/11 264/9
 future [8] 27/12 38/1 38/10 38/10 76/24
 78/2 167/24 178/5

G
 GALLINARO [8] 1/11 2/22 23/2 61/10
 68/9 330/4 330/5 330/7
 gap [13] 14/22 15/13 15/14 16/10 16/11
 18/25 24/4 24/9 24/22 272/10 272/12
 272/21 272/24
 gaps [1] 84/18
 garnered [1] 42/9
 gather [5] 73/19 84/24 242/20 243/13
 279/15
 gathered [3] 23/11 115/5 175/12
 gathering [1] 177/2
 gauge [1] 84/22
 gave [6] 5/11 87/15 231/17 234/12
 312/21 313/8
 gears [1] 63/23
 gee [1] 324/25
 geez [1] 328/2
 gender [9] 33/22 34/4 40/16 41/23
 41/24 79/9 80/11 80/13 80/16
 general [23] 54/6 70/21 71/15 71/16
 124/10 124/11 161/25 196/25 204/15
 204/16 205/12 208/13 208/15 225/17
 226/13 226/17 226/20 227/2 265/18
 276/1 277/11 279/21 322/9
 generality [1] 195/24
 generally [11] 22/4 78/19 109/9 133/11
 140/19 140/22 149/10 168/25 177/25
 195/13 259/9

G
generate [2] 93/25 197/2
generated [4] 93/24 209/3 209/4
209/24
genie [1] 15/24
gentleman [2] 60/14 178/25
gentleman's [1] 58/13
genuine [1] 93/8
get [107] 4/14 5/21 6/11 10/12 10/13
10/19 11/19 12/5 12/14 12/17 14/6
14/11 16/21 17/1 17/14 17/18 18/9
19/10 19/16 24/17 25/1 25/2 25/3 26/14
34/13 41/3 43/7 47/11 50/8 60/23 73/2
73/10 75/10 83/4 83/15 85/6 87/25 88/9
93/2 94/14 97/5 98/23 100/17 102/20
125/10 136/7 137/2 150/17 157/16
159/1 161/24 162/22 193/20 202/9
204/6 205/21 206/19 208/9 209/25
210/17 210/18 210/19 212/8 212/20
214/2 215/3 222/3 222/4 222/15 222/17
223/4 224/17 227/8 234/4 235/17
237/20 237/23 238/15 241/16 242/6
243/3 245/6 247/9 248/23 252/16
252/19 256/18 260/3 263/17 264/3
266/13 267/12 267/17 269/25 279/25
281/6 303/9 305/6 305/16 311/11 316/6
323/4 324/6 325/9 327/21 328/18
328/19
gets [8] 29/22 69/3 71/3 91/5 159/2
208/21 210/18 265/14
getting [24] 10/10 35/15 57/1 90/3
91/10 92/15 137/6 162/23 171/16
177/24 186/21 206/17 208/5 212/21
213/8 219/11 235/18 243/10 247/13
259/14 271/16 272/3 309/6 313/13
girl [7] 47/5 48/14 51/24 53/25 55/22
56/7 56/24
girlfriend [7] 55/25 56/12 56/15 57/12
57/20 58/18 58/22
girlfriend's [1] 57/16
girls [2] 57/19 323/24
gist [1] 327/25
give [36] 3/11 13/24 19/22 54/22 60/3
68/17 75/5 77/14 83/22 84/16 88/4
88/21 89/19 101/23 115/1 139/9 150/12
157/11 189/9 201/10 207/17 210/22
226/4 231/18 233/24 247/9 273/23
274/9 280/2 318/2 319/7 322/20 322/24
323/9 326/12 328/21
given [30] 8/8 33/7 33/9 33/9 33/17
59/5 91/16 91/17 101/14 142/22 180/7
187/19 209/12 227/14 237/2 243/1
243/13 253/11 271/11 273/1 286/2
291/7 291/13 292/23 293/9 308/9 311/2
317/5 325/5 328/11
gives [3] 22/5 22/20 85/17
giving [4] 3/14 184/7 184/8 249/3
glad [1] 212/21
gleaned [1] 31/2
go [73] 4/1 7/24 15/22 18/22 22/1 23/6
23/8 23/15 23/16 23/20 24/14 24/25
28/4 33/8 48/8 51/5 60/17 73/23 74/23
74/24 75/1 75/13 75/14 79/22 80/3
91/15 97/4 129/22 129/25 131/11 136/6
136/20 139/24 156/17 156/20 156/24
160/18 164/2 167/7 170/4 171/8 171/10
173/25 175/20 192/9 194/22 204/20
205/21 221/24 222/1 227/1 234/9 246/4
246/15 248/10 249/6 255/8 262/3
262/24 267/9 275/7 276/7 285/18

286/13 287/7 289/7 289/7 292/22 299/6
300/19 302/6 310/24 325/9
315/5 6/13 90/18 205/23 312/14
328/19
Goen [1] 135/12
goes [12] 28/18 118/2 143/21 150/22
166/17 184/12 192/14 214/18 238/23
257/10 283/25 308/12
going [197] 3/5 4/18 5/11 6/3 7/19 7/21
7/22 8/4 8/9 8/10 8/12 8/16 9/7 9/13
9/15 10/9 10/11 12/2 14/9 15/3 15/4
15/11 15/13 15/14 16/2 16/12 16/13
16/20 17/6 17/7 17/17 17/25 18/1 18/19
18/21 19/22 20/2 20/5 24/11 24/21
24/23 24/25 25/15 27/14 27/21 32/11
35/1 35/24 36/24 36/24 42/2 44/8 44/14
47/11 47/13 49/21 50/25 63/18 66/22
68/20 71/9 75/21 80/1 84/22 85/4 85/14
90/17 91/5 92/1 92/9 95/12 100/9
101/19 102/8 102/10 102/17 103/23
105/18 106/17 111/11 113/19 127/25
130/23 132/12 132/18 133/6 133/9
136/5 136/6 137/11 151/11 151/14
154/20 155/11 156/14 157/6 162/2
163/19 169/12 179/22 199/20 203/8
204/5 205/1 205/2 208/9 211/18 212/11
217/8 218/5 218/12 223/2 223/3 223/10
223/13 225/22 232/3 232/5 232/5 232/6
232/7 237/18 240/21 241/4 241/10
243/24 245/3 245/21 245/21 247/14
247/19 249/1 249/17 253/4 253/22
254/23 255/10 257/11 259/5 260/4
260/11 260/12 260/19 262/23 264/24
265/7 265/12 267/10 269/23 269/24
271/22 273/22 274/4 274/11 274/13
274/20 274/25 275/2 275/22 276/6
276/7 277/22 278/19 282/17 284/22
285/7 286/15 291/11 296/3 296/21
299/25 303/7 303/7 305/4 310/24
312/23 314/14 315/3 315/5 316/3
316/16 319/7 321/21 322/19 322/23
324/11 324/14 324/14 324/16 324/24
325/12 325/13 325/15 326/11 327/13
328/24 328/25
gone [5] 190/11 212/22 219/24 258/22
316/10
gonna [3] 50/11 95/1 209/4
good [34] 2/13 2/16 2/19 2/21 10/21
20/19 44/12 44/21 44/22 52/9 52/10
60/19 61/4 61/14 61/15 67/10 68/12
69/13 69/23 69/24 81/5 84/3 117/12
136/3 136/4 182/6 182/11 182/11
200/22 200/23 267/17 278/17 278/18
327/12
goodwill [2] 119/5 119/7
Google [1] 288/21
got [35] 3/21 4/5 4/8 15/12 17/8 41/7
62/24 72/11 75/17 89/18 121/3 121/4
171/20 172/18 188/4 201/17 213/11
215/24 217/12 224/18 224/20 228/22
238/14 253/20 256/25 259/14 264/24
266/17 267/8 267/24 313/8 314/8 316/4
323/5 327/24
Gotch [1] 3/10
gotten [5] 4/10 247/18 249/4 301/17
322/13
government [1] 282/7
grades [1] 101/17
grads [1] 273/16
graduate [8] 27/24 136/23 137/23

138/1 186/19 234/4 271/22 272/23
graduated [1] 265/17
graduating [8] 30/16 186/9 265/1 186/5/3
273/9 273/10 305/21 310/15
graduation [1] 18/22
grammar [1] 300/21
grand [2] 137/24 232/6
grant [4] 12/9 12/19 13/9 13/14
granted [2] 222/6 243/16
great [3] 201/2 262/25 305/21
grew [2] 137/9 215/19
ground [5] 40/19 42/5 184/15 184/19
185/17
grounds [2] 181/5 202/5
group [9] 78/1 117/3 130/6 131/13
131/17 149/9 212/17 216/7 221/2
groups [3] 144/21 238/2 315/11
guarantee [1] 290/25
guess [27] 7/17 19/16 23/24 81/19
89/17 101/22 104/20 109/9 109/11
113/1 119/4 119/7 148/23 161/13 205/5
205/8 205/17 205/20 228/24 236/6
240/4 243/25 245/2 271/6 293/18
297/14 308/4
guessing [2] 84/13 126/13
guidance [2] 279/4 280/1
guide [3] 184/11 202/17 279/14
guideline [5] 312/5 312/10 312/13
313/25 313/25
guidelines [7] 43/15 91/16 109/18
149/25 237/12 258/22 269/13
guides [1] 205/18
guys [1] 329/6

H
habit [1] 110/18
habits [1] 162/10
had [205] 4/16 5/10 6/14 6/21 7/12 7/14
8/24 9/7 14/14 21/11 22/10 22/12 30/11
30/11 36/15 36/15 36/16 36/18 36/19
38/23 39/17 41/13 42/3 43/2 43/10 44/1
45/21 46/1 46/5 46/5 46/5 49/2 49/21
51/16 52/19 52/19 52/20 52/21 52/21
53/1 53/19 53/24 55/11 56/11 56/15
57/2 57/2 57/19 62/10 62/14 62/21
62/22 63/3 63/9 63/12 64/6 64/14 66/11
66/15 66/24 67/22 68/3 69/5 75/7 77/12
83/9 84/12 85/7 85/7 92/25 93/5 95/19
102/18 102/22 104/24 106/24 107/9
107/11 108/6 110/6 112/7 114/17
114/20 116/7 116/9 116/19 116/25
117/1 117/6 117/6 118/17 119/18
119/23 123/7 123/8 123/14 123/15
124/4 129/2 130/5 130/6 130/9 131/3
132/25 136/17 138/2 138/12 141/24
142/6 150/14 150/15 151/8 151/24
153/1 154/14 154/20 155/2 158/19
158/21 160/17 162/12 163/4 164/4
168/12 169/16 169/21 172/22 177/22
179/13 179/25 181/13 182/2 182/4
182/6 182/23 188/13 191/18 192/10
192/17 192/23 192/25 200/4 217/11
220/13 224/19 225/9 225/24 225/25
227/11 228/8 229/18 229/19 229/21
232/25 235/2 235/3 235/21 237/14
238/5 238/14 239/11 239/15 241/15
248/22 249/12 249/17 249/18 249/19
250/2 251/9 254/8 254/9 254/19 256/2
256/15 257/15 257/23 259/4 259/20
260/18 263/12 263/12 268/11 270/23

H
had... [21] 274/1 280/3 283/2 291/19
294/7 297/1 298/21 299/1 308/13
309/9 309/22 313/12 313/15 316/10
318/5 318/24 319/2 324/3 324/15 328/1
329/8
hadn't [5] 23/16 63/5 116/9 182/10
194/2
half [8] 53/3 136/12 211/18 233/24
246/10 246/12 289/5 291/6
halfway [1] 10/18
hall [6] 53/23 62/20 63/10 136/24
202/24 298/25
hallway [8] 62/25 63/1 63/9 67/13
102/19 259/5 259/12 262/2
HAMILL [9] 1/10 2/20 3/11 11/1 39/23
200/24 274/4 330/13 330/14
hand [16] 20/22 21/1 22/6 22/21 44/13
61/5 69/14 139/11 141/10 163/19
173/22 192/14 192/14 200/13 241/21
324/20
handbook [14] 17/19 202/16 203/14
203/19 204/23 205/18 224/12 224/15
226/19 279/14 280/6 280/17 280/25
287/8
handed [5] 47/5 48/14 209/25 249/20
314/8
handful [1] 233/25
handle [9] 3/8 3/9 3/10 90/17 183/3
184/18 192/8 265/22 277/8
handled [4] 34/8 105/25 122/15 206/11
handling [5] 42/6 122/1 138/2 204/13
276/15
hands [1] 118/19
Hang [1] 129/23
hanging [1] 17/21
happen [12] 40/8 65/7 130/25 144/6
183/11 183/14 250/22 265/10 285/7
306/22 311/1 311/16
happened [36] 15/11 15/17 28/10 28/19
38/15 47/7 59/4 62/22 62/22 63/4 71/5
74/4 85/9 100/6 109/13 119/22 173/6
225/12 225/15 227/10 228/14 229/13
229/15 229/19 231/21 256/11 257/20
271/5 291/1 296/24 297/1 301/15
309/11 310/1 318/17 318/19
happening [6] 127/22 139/15 225/13
238/13 270/3 284/24
happens [6] 38/5 144/15 176/17 196/10
198/23 265/13
happy [7] 3/13 23/19 65/2 212/22
274/18 303/12 322/4
harass [1] 259/15
harassed [3] 257/24 258/19 316/12
harassing [9] 31/15 32/22 33/10 41/20
146/13 266/4 287/1 304/17 314/2
harassment [13] 70/12 109/19 129/7
129/16 147/2 148/18 164/7 176/11
204/14 218/20 269/12 269/15 313/19
hard [10] 71/11 111/13 116/20 120/11
187/13 203/13 211/2 219/19 243/2
298/8
harm [25] 14/21 15/3 15/5 16/3 16/5
16/7 17/3 17/6 18/20 19/4 19/18 22/17
25/5 37/20 37/21 38/13 38/14 38/21
93/7 94/15 193/13 193/14 266/18 268/4
268/5
harming [2] 85/12 150/15
harms [3] 19/11 23/22 34/14
has [119] 9/1 10/25 14/19 14/22 16/21

17/21 23/2 23/23 24/13 24/19 25/21
25/22 27/9 27/17 28/12 30/19 30/25
38/2 38/21 34/8 34/23 34/24 36/23 37/2
37/14 38/9 38/15 42/2 43/12 55/4 55/18
60/22 62/3 73/13 76/22 79/9 80/18 85/9
88/7 88/9 89/13 89/14 101/9 101/14
106/15 138/20 139/1 140/8 144/17
144/22 148/5 161/10 165/2 166/2
176/18 176/20 179/8 180/19 180/22
185/13 185/21 187/23 191/8 202/18
206/20 208/21 213/22 214/4 214/5
215/8 217/17 217/20 217/24 218/5
219/18 223/16 228/8 233/18 233/22
236/13 240/3 242/6 242/14 243/24
244/22 251/2 257/5 257/9 261/4 261/5
265/3 267/13 270/12 272/10 272/12
273/5 276/13 281/7 281/8 282/7 282/15
283/11 284/23 296/10 300/17 302/6
302/10 302/16 302/25 305/18 306/1
306/4 307/7 307/17 309/21 312/10
314/17 317/2 327/7
hasn't [4] 218/4 263/24 294/20 314/4
have [718]
haven't [17] 6/9 12/14 21/11 32/9 41/13
42/7 100/15 164/4 171/1 211/8 214/11
218/3 319/11 322/13 324/15 324/18
324/19
having [15] 7/4 9/5 69/1 71/11 98/11
103/25 117/24 120/11 168/8 171/14
194/17 225/4 237/22 240/8 254/18
Hawaii [1] 101/19
he [223] 5/22 8/12 11/16 14/19 15/4
15/10 15/12 15/13 15/13 15/15 15/19
15/23 16/24 17/1 17/13 17/16 18/8 18/8
18/9 18/13 18/20 18/22 18/22 23/21
23/23 24/14 24/16 24/17 24/19 24/19
24/20 31/9 31/15 31/16 34/6 35/6 36/8
36/11 36/15 43/10 43/11 44/10 51/22
62/15 63/15 63/18 63/21 64/14 68/15
70/22 70/23 70/25 71/3 92/25 93/4 93/6
93/7 94/13 94/14 94/15 94/15 95/24
96/10 96/20 96/21 103/14 111/13
114/20 116/8 116/10 117/1 117/15
127/7 153/1 153/25 154/3 154/20
154/20 154/25 155/2 155/2 157/9
157/13 157/14 157/18 157/20 157/22
157/24 158/1 158/21 159/19 161/2
167/17 174/2 178/11 179/6 181/11
181/13 186/22 187/23 195/22 199/20
211/14 213/5 213/11 213/11 213/12
213/12 213/21 213/22 214/6 224/19
224/20 224/20 224/20 225/22 225/24
225/24 226/11 226/12 227/3 227/12
235/2 238/18 238/19 238/21 239/13
239/14 239/14 240/24 241/12 241/14
241/14 241/15 242/4 242/6 242/7
243/21 249/12 249/17 249/18 249/19
250/2 250/22 251/1 251/2 254/1 254/4
254/7 254/8 254/9 254/17 254/19
254/21 256/2 257/24 257/25 258/18
259/17 260/20 260/21 260/22 260/23
261/3 261/11 262/9 263/24 264/16
264/17 266/23 267/10 267/19 271/9
271/11 271/15 271/15 273/6 285/22
286/12 288/11 288/11 288/25 288/25
289/1 289/8 290/15 291/7 291/19
291/20 292/7 292/18 293/1 293/4 293/6
297/5 298/20 298/21 298/24 299/1
302/1 302/6 302/10 302/13 302/25
303/6 304/6 304/7 305/5 305/6 305/7

317/12 317/13 317/18 317/19 317/20
318/5 318/7 318/17 318/20 318/21
318/21 318/24 325/5
he'd [1] 263/25
he'll [3] 3/6 3/9 23/22
he's [35] 9/1 11/20 14/20 15/8 16/20
16/22 16/25 17/9 18/13 18/21 24/13
24/15 24/21 37/10 153/8 153/25 167/10
167/10 182/15 199/2 207/19 208/3
208/4 214/5 214/20 225/22 249/2 259/5
259/5 259/17 260/17 261/6 261/8 261/9
271/8
head [18] 16/10 83/18 84/17 90/5
112/14 115/24 120/1 127/22 172/10
173/7 197/11 202/10 202/12 239/17
241/19 290/12 313/18 313/22
headed [1] 201/5
headphones [2] 244/17 245/13
health [10] 93/17 98/21 99/7 99/7 166/6
224/2 224/13 228/25 228/25 297/22
Healthdyne [1] 38/18
healthier [1] 269/25
hear [20] 7/7 13/8 14/3 14/5 29/19
30/18 31/21 36/2 37/16 38/23 61/9
69/19 87/6 224/22 224/23 236/20
250/16 250/18 283/17 328/2
heard [15] 11/13 28/6 30/10 34/17
116/9 246/2 246/7 261/15 263/10
263/11 264/18 294/6 321/17 323/13
325/11
hearing [214] 1/6 2/5 4/12 8/10 13/18
15/10 29/18 29/23 30/11 31/2 31/3 31/5
33/15 37/9 39/7 42/15 46/2 49/21 52/1
64/6 64/7 64/13 64/21 64/23 65/1 65/21
66/3 66/10 66/24 68/1 87/10 88/25 90/9
91/1 91/5 114/8 115/4 121/21 122/4
122/5 144/10 146/11 160/12 160/13
160/23 170/17 179/21 179/25 180/8
180/22 181/21 188/16 188/19 189/2
189/18 190/9 190/11 203/6 207/23
208/4 211/4 215/18 215/19 216/12
216/17 217/2 217/8 218/19 219/13
220/1 221/13 221/15 221/20 221/21
221/24 222/14 222/17 222/20 223/3
223/6 224/8 225/1 225/24 226/9 229/17
230/13 231/3 231/14 231/16 234/12
234/14 234/18 234/23 236/21 236/24
237/6 237/8 237/10 237/14 237/17
237/25 238/7 238/9 238/25 239/9
239/11 239/13 239/16 239/18 239/22
240/3 240/6 240/7 240/13 240/22
241/13 242/9 242/14 242/20 243/8
243/14 243/16 243/19 244/25 245/13
245/16 245/25 246/5 246/7 246/22
248/1 248/11 250/21 251/9 251/12
254/3 254/5 254/12 254/19 256/13
256/17 257/10 257/15 257/18 257/21
257/22 258/3 258/6 258/10 259/11
260/5 262/12 263/11 263/13 263/14
266/8 268/15 274/22 275/20 275/22
283/17 283/18 284/5 284/8 284/13
284/19 284/22 285/16 285/22 285/23
286/3 286/5 286/8 286/16 287/10 288/2
289/24 289/25 290/3 290/19 291/19
291/22 292/2 292/4 292/8 292/16
292/21 292/22 293/14 293/22 294/5
294/11 294/19 294/20 295/1 295/1
295/4 298/23 299/10 299/11 299/12
299/19 300/8 300/22 304/1 304/11
306/19 307/25 309/13 310/20 311/22

H
hearing... [3] 317/13 317/17 318/4
hearings [10] 203/7 171/8 220/1 12/1
117/25 218/23 226/12 226/14 233/1
257/8
hears [1] 30/1
Heather [25] 8/6 60/22 69/12 69/20
70/5 76/5 98/5 134/23 135/9 135/11
135/12 206/12 222/8 243/15 257/24
260/3 260/7 260/15 265/14 276/2
307/11 314/2 316/15 321/5 330/8
Heather Ryan [1] 265/14
heck [1] 10/24
heightened [1] 308/6
held [15] 2/1 31/3 44/2 45/18 69/6
133/1 157/4 157/5 179/21 200/5 201/13
274/2 293/20 293/21 298/14
Hello [1] 66/6
help [15] 65/2 66/4 73/12 93/2 94/13
124/2 137/10 192/20 212/8 212/24
214/3 227/12 305/3 305/6 305/17
helpful [19] 3/16 21/13 21/14 25/9
50/13 74/16 85/23 93/20 93/22 104/1
111/18 140/7 158/1 166/18 228/17
229/11 241/20 323/7 328/5
helping [3] 101/5 112/19 279/7
helps [4] 60/21 72/12 145/18 214/4
her [145] 3/2 3/3 3/4 4/9 47/5 47/23
48/1 48/2 48/5 48/12 48/14 48/16 49/1
49/6 49/22 49/24 50/1 50/1 50/6 50/9
50/10 50/10 50/16 53/13 53/20 53/25
54/4 55/9 56/8 57/12 59/14 60/23 63/21
65/17 66/5 68/16 78/8 93/2 93/4 93/6
93/10 93/10 93/11 93/21 95/10 100/18
100/19 101/5 101/14 101/15 101/17
102/19 107/2 107/5 110/6 111/19 112/8
112/9 116/10 117/8 121/4 124/21
125/17 126/6 126/24 126/25 127/5
127/7 127/20 128/23 128/24 128/24
129/9 130/14 132/18 141/24 141/25
158/16 159/1 159/2 164/3 164/21
168/15 169/2 169/3 169/3 169/8 170/1
175/20 193/20 193/23 194/11 195/17
197/24 206/14 209/1 210/13 210/15
210/21 217/17 218/1 220/4 221/17
222/11 222/12 222/15 222/16 229/23
230/20 237/15 237/20 237/21 237/24
238/16 238/17 239/13 243/15 258/19
259/6 260/16 260/21 262/8 262/11
263/14 264/25 264/25 265/8 265/8
271/24 275/1 277/25 315/7 316/5 317/1
317/12 317/15 317/19 317/19 317/24
318/5 319/5 319/19 324/6 324/16
325/13
here [188] 2/5 2/12 5/14 5/14 5/19 5/21
5/24 5/25 6/3 6/8 6/11 6/13 6/20 7/14
7/18 7/23 8/1 8/4 8/24 9/5 9/6 9/6 9/10
10/7 10/12 10/14 10/18 11/1 11/16
11/22 12/1 12/5 12/16 12/17 14/5 14/6
14/15 14/17 16/16 17/4 17/8 19/18 20/7
22/14 24/12 24/16 33/14 34/20 35/6
37/8 38/10 38/11 40/21 40/22 40/24
40/24 41/7 41/11 41/18 41/19 42/23
43/6 43/22 44/14 45/10 54/15 54/18
55/7 62/2 66/23 68/16 70/4 70/20 83/18
83/24 86/13 95/13 97/6 97/12 97/19
104/3 105/2 105/8 111/6 114/5 117/22
123/3 123/20 126/4 127/11 128/10
129/6 130/18 132/22 136/5 139/8
140/10 140/14 140/18 140/24 145/19

148/12 151/25 153/18 158/14 159/24
160/10 160/19 162/2 163/18 163/19
167/16 170/3 173/12 177/13 195/7
200/2 200/12 200/25 203/4 203/13
203/19 203/21 204/6 204/8 206/17
207/2 208/14 208/25 211/13 214/4
214/11 214/12 215/14 216/12 221/23
224/9 224/23 227/3 227/15 229/18
230/16 230/21 231/23 245/21 247/11
248/25 250/19 252/7 255/13 258/16
262/23 264/5 266/11 269/16 269/24
273/18 273/24 274/5 275/14 275/18
275/19 276/7 278/19 284/11 286/6
286/9 288/7 289/5 293/5 293/9 296/19
296/22 303/10 304/14 307/22 312/2
312/23 316/7 323/4 323/6 324/5 325/11
326/23 327/14 328/23 329/1 329/7
herself [1] 134/18
heterosexual [1] 313/8
hey [1] 9/3
Hi [1] 65/20
high [5] 29/2 33/1 106/25 211/24
215/13
higher [10] 26/2 26/3 31/13 136/17
136/21 138/17 232/22 280/14 283/16
301/10
highlighted [5] 107/7 114/5 145/22
185/6 237/9
highlights [2] 185/7 299/15
highly [1] 2/8
him [115] 6/4 6/10 6/11 6/13 6/14 8/13
15/2 15/5 15/17 15/17 16/17 16/20
16/21 17/12 17/15 18/10 18/11 18/21
24/8 41/20 46/9 47/13 51/16 56/9 57/20
59/16 59/17 63/14 87/19 93/2 94/13
96/1 96/7 96/8 96/14 97/1 98/24 99/1
99/2 103/13 103/16 105/4 111/8 116/9
126/24 127/6 129/10 129/14 129/15
150/17 150/18 152/25 154/14 154/14
154/16 155/2 155/21 156/1 156/3 157/8
157/13 157/20 158/19 159/21 160/21
161/4 165/8 165/14 165/21 167/3
167/16 167/23 169/25 170/7 172/16
172/22 172/25 173/5 182/2 182/23
190/6 194/19 195/21 199/18 199/19
213/7 214/9 214/10 214/15 214/21
225/4 237/20 237/22 237/24 238/1
240/8 242/7 242/9 242/11 242/14
242/15 254/11 260/22 260/22 264/4
266/25 267/20 273/6 275/5 291/19
298/19 305/14 305/20 318/18 328/23
himself [8] 31/16 93/1 93/7 94/15
150/15 154/21 213/5 297/5
hired [1] 202/14
his [109] 12/24 14/18 14/22 15/9 15/13
15/14 15/15 16/21 17/1 17/10 18/9
18/14 18/20 18/21 18/24 18/25 22/15
22/17 23/21 24/4 24/20 24/21 25/23
31/8 36/4 36/10 44/8 45/13 46/1 46/5
46/9 51/15 51/19 58/14 59/18 60/2
63/12 63/13 64/12 68/15 92/24 96/15
99/7 107/2 113/12 120/18 124/19 129/6
157/10 157/22 158/16 158/21 159/1
159/2 159/4 159/19 165/8 165/19
178/25 186/16 190/5 190/6 190/7 193/8
197/5 204/8 213/8 224/23 224/24
224/24 225/4 226/1 237/14 237/19
237/23 242/13 249/19 250/22 253/24
254/3 254/22 254/24 262/3 262/4
263/13 263/21 266/22 268/17 271/2

271/3 271/4 271/9 271/11 271/14 273/6
287/21 291/14 291/22 292/8 294/13
298/2 305/8 305/19 317/11 317/7
317/22 317/22 318/14 328/23
history [7] 41/12 76/22 76/24 77/7 77/9
77/24 316/5
hold [7] 17/22 156/17 265/5 265/6
265/8 270/16 271/4
holding [1] 282/12
holds [1] 12/24
hole [1] 41/4
home [4] 49/24 49/25 64/20 66/2
homework [2] 62/21 63/5
honest [10] 26/24 209/22 210/16 241/3
241/24 251/25 256/5 264/10 277/3
319/13
honestly [3] 26/23 120/16 120/20
Honor [161] 2/13 2/16 2/19 2/21 3/13
4/25 6/14 7/1 7/10 8/22 9/8 9/14 9/17
9/24 10/8 10/20 11/6 11/18 12/11 13/10
13/23 14/1 14/14 15/1 16/16 19/14
20/20 22/7 22/20 23/18 24/2 24/6 25/13
25/16 25/17 26/4 26/10 26/24 28/12
29/19 29/21 30/1 30/25 32/10 32/25
33/20 34/17 35/11 36/10 36/13 37/5
37/15 37/16 37/19 38/12 38/22 39/10
39/13 39/22 39/25 40/3 40/12 43/18
44/7 45/4 45/8 48/8 52/6 60/10 60/12
60/15 60/21 61/11 65/3 66/20 68/10
69/11 70/6 85/22 116/11 125/8 128/6
131/14 132/4 132/7 132/20 134/14
135/4 135/18 135/24 140/10 140/11
146/17 147/8 147/14 151/14 151/21
155/6 162/4 162/8 163/10 163/13
164/10 165/1 172/1 174/4 174/7 175/2
177/3 177/6 186/14 186/25 187/2 197/5
198/8 200/10 204/8 208/6 221/8 227/19
273/18 273/25 274/8 274/14 274/17
274/20 275/9 277/22 278/2 278/7
278/10 278/14 281/15 289/11 289/16
303/5 303/20 310/17 312/15 312/18
319/21 319/23 320/11 320/13 320/19
321/15 321/18 322/25 323/12 323/17
324/13 326/2 326/16 327/1 327/2 327/5
327/6 327/11 327/19 328/8 329/5
Honor's [5] 48/6 50/22 151/11 323/2
323/19
HONORABLE [1] 1/7
Honors [1] 279/2
hookup [1] 228/11
hope [3] 212/24 234/2 280/10
hopefully [4] 10/7 14/4 14/6 33/8
hopes [1] 242/6
horn [1] 10/13
horse [2] 232/20 250/13
hospital [2] 101/19 137/2
hospitalized [1] 225/25
host [2] 184/20 310/21
hostile [3] 84/18 166/24 207/15
hot [1] 232/22
hour [9] 9/18 9/19 9/21 31/3 53/3 53/19
132/16 157/3 246/11
hour-and-a-half [1] 53/3
hours [8] 53/4 53/7 53/12 53/16 165/21
246/11 284/9 289/5
housing [3] 50/4 201/22 201/24
how [129] 9/15 11/19 12/13 15/2 21/4
24/7 24/8 27/10 35/8 35/9 35/12 35/18
41/20 47/12 51/14 51/22 52/21 53/1
53/5 54/17 54/22 59/3 60/3 63/11 73/4

H
 how... [104] 74/17 76/12 82/23 83/8
 83/18 84/22 85/3 87/40 88/10 89/6
 89/20 93/3 93/6 94/13 98/23 101/7
 103/4 105/24 106/24 109/18 111/25
 113/16 115/11 123/2 125/6 125/21
 128/5 130/19 131/9 136/9 136/17 139/1
 144/23 145/17 148/2 149/7 149/24
 155/17 156/3 157/2 169/22 174/16
 184/8 184/18 184/22 185/8 185/17
 185/20 187/17 188/18 189/6 189/11
 189/14 189/23 190/3 191/8 201/5
 202/21 203/19 204/18 204/20 204/22
 205/21 209/11 209/18 210/18 213/5
 215/24 219/22 234/4 234/4 236/10
 237/6 237/8 237/9 244/12 244/14 254/3
 254/4 256/17 256/24 258/24 264/10
 271/9 274/4 283/3 283/7 283/13 284/8
 284/10 287/11 290/11 296/10 296/21
 297/18 297/19 298/17 299/6 300/13
 305/6 307/8 307/13 308/2 316/25
 however [5] 46/9 225/3 242/18 255/19
 328/10
 huh [26] 76/11 81/23 83/14 83/16 92/16
 93/9 93/16 97/20 100/24 101/1 105/10
 107/1 113/5 114/6 118/1 123/23 128/15
 170/2 189/3 198/5 204/15 245/18
 248/15 295/6 302/18 308/22
 human [2] 234/3 280/9
 Hunt [2] 87/5 218/22
 Hunting [4] 42/5 184/15 184/18 185/17
 hurt [1] 85/14
 hurts [1] 212/7

I
 I'd [13] 37/19 106/1 111/3 111/3 120/8
 131/14 136/7 178/21 193/22 230/25
 293/2 311/5 322/8
 I'll [27] 3/10 21/1 22/6 22/21 23/6 26/24
 34/16 47/16 48/6 92/10 107/17 108/8
 131/13 169/11 227/1 241/3 241/24
 242/3 245/23 252/23 255/4 263/1 276/6
 299/9 324/20 326/3 328/18
 I'm [272] 3/3 3/5 3/6 3/13 4/15 6/9 7/16
 8/10 8/16 9/9 11/21 12/12 12/18 13/4
 13/8 13/21 16/9 23/19 24/7 24/25 25/7
 26/6 26/25 32/4 32/5 34/13 35/15 37/23
 37/25 38/9 44/8 44/12 46/7 49/14 50/25
 52/2 54/24 58/12 60/6 61/19 65/16 70/5
 71/9 71/11 77/20 85/4 85/6 85/14 85/20
 89/4 90/2 90/4 91/9 91/22 91/25 92/1
 92/5 92/9 94/8 94/11 94/11 95/1 95/7
 95/9 95/12 95/22 97/19 98/4 98/5 98/7
 99/8 102/7 102/10 103/23 103/25 104/6
 104/10 104/10 104/15 105/1 105/2
 105/3 105/6 105/18 105/23 106/1
 106/17 112/6 112/12 113/14 116/15
 119/15 120/8 120/9 120/9 120/11 121/3
 121/6 124/2 126/3 126/13 126/13 127/8
 127/22 128/3 130/2 130/7 130/12
 130/17 130/20 131/6 131/7 135/1 136/5
 151/9 151/11 151/14 155/11 158/3
 159/8 162/2 163/19 164/25 167/7 169/4
 169/24 171/16 172/9 173/1 173/6
 173/11 179/12 179/15 179/22 180/20
 184/3 185/1 186/21 188/22 190/2
 190/16 191/11 193/22 194/8 194/21
 195/5 195/6 197/15 203/8 203/25 204/5
 205/8 205/21 206/2 208/2 208/8 208/8
 208/9 208/10 209/4 210/3 210/8 210/8

212/21 212/21 212/22 212/22 215/14
 217/19 217/23 218/4 218/5 218/7
 218/12 223/9 228/9 223/13 226/11
 230/3 231/20 231/25 232/3 232/5
 233/14 233/18 234/11 235/17 237/15
 238/19 238/21 241/4 241/7 241/10
 242/23 243/17 243/24 247/3 247/10
 247/23 249/3 249/8 249/17 250/13
 252/7 252/22 253/4 253/5 253/22
 254/23 256/6 256/22 259/13 260/11
 260/12 262/23 265/17 265/18 266/24
 269/7 269/8 270/10 271/6 271/9 273/8
 273/12 273/15 273/18 273/18 274/18
 276/6 276/6 276/7 276/16 276/16 277/3
 277/5 277/22 278/19 289/2 291/11
 296/3 299/25 301/24 303/7 308/5 308/6
 312/21 312/23 313/7 313/11 313/13
 314/14 315/3 315/5 316/16 319/7
 321/19 322/4 322/19 324/10 324/14
 324/14 324/16 325/15 326/3 326/11
 327/13 328/19 328/23 328/24 328/25
 328/25
 I've [8] 26/25 35/3 48/22 105/8 131/17
 163/18 255/21 283/1
 idea [13] 5/21 7/4 9/7 80/12 80/20
 115/25 250/4 256/5 264/10 265/10
 277/3 319/13 327/12
 ideation [3] 192/14 229/1 304/19
 identifiable [1] 203/13
 identified [7] 143/11 216/8 221/21
 251/2 288/25 289/1 294/22
 identifies [1] 294/20
 identify [16] 3/4 58/14 65/13 65/22
 94/14 143/5 196/22 203/9 212/24 216/3
 223/14 252/24 287/15 289/1 299/8
 299/17
 identifying [2] 86/9 134/18
 identity [1] 45/15
 ignore [1] 102/3
 ignored [1] 102/3
 ignoring [1] 193/3
 Illinois [1] 279/2
 illness [5] 98/21 225/20 228/22 231/6
 231/7
 illnesses [1] 229/1
 imagine [3] 3/19 5/3 149/15
 immediate [4] 13/22 15/7 15/19 153/8
 immediately [3] 169/7 225/14 234/18
 impact [9] 23/23 102/9 107/11 118/15
 118/22 118/22 168/10 185/17 185/23
 impacted [4] 80/18 279/22 281/8 281/8
 impacts [1] 185/20
 impartial [6] 203/25 205/1 205/2 205/14
 205/16 205/17
 impermissible [1] 261/5
 implicated [1] 233/12
 importance [2] 145/13 312/4
 important [9] 9/2 28/13 100/3 157/21
 228/15 261/18 266/13 324/23 325/5
 imposing [1] 40/11
 impossible [1] 21/20
 impression [2] 7/20 180/20
 improper [1] 34/19
 in-person [2] 156/7 298/14
 inaccurate [1] 233/24
 inadequacy [1] 23/9
 Inc [1] 277/16
 inches [8] 17/9 215/13 215/16 215/16
 215/18 215/20 221/11 221/11
 incident [51] 28/18 57/3 57/5 57/8

57/16 58/17 58/22 65/25 67/12 118/18
 140/25 166/21 168/15 168/18 190/24
 202/28 203/1 225/8 225/10 225/10
 225/13 228/1 228/2 228/3 228/3 228/4
 236/16 236/25 257/20 262/1 266/8
 294/17 295/9 295/10 295/17 295/21
 296/1 296/8 296/15 296/23 297/6
 297/13 297/15 297/16 297/22 309/20
 311/9 318/15 318/17 318/19 320/4
 incidentally [1] 96/18
 incidents [10] 203/20 234/15 234/20
 235/3 235/21 248/7 276/22 313/15
 316/21 317/7
 inclined [1] 3/3
 include [8] 17/22 70/12 96/1 96/5
 100/11 160/6 215/11 231/15
 included [13] 78/1 93/14 112/25 144/4
 146/14 180/16 180/18 180/20 244/21
 284/9 284/16 305/12 314/19
 includes [1] 127/5
 including [9] 26/16 31/5 138/17 138/23
 166/5 202/3 287/1 304/16 317/12
 inclusive [2] 132/9 135/20
 incoherent [1] 52/23
 incomplete [2] 24/19 272/14
 incorporating [1] 96/16
 increase [2] 84/12 84/15
 increasing [1] 106/13
 indeed [2] 117/18 182/13
 independent [2] 170/22 279/24
 independently [1] 77/8
 INDEX [3] 330/1 331/1 332/1
 INDIANA [4] 1/1 217/16 218/2 218/7
 indicate [3] 31/17 150/24 255/10
 indicated [9] 5/7 7/13 7/25 34/19
 229/17 254/17 303/12 308/14 314/7
 indicates [8] 29/12 33/11 34/3 37/16
 165/21 258/12 302/1 315/11
 indicating [3] 261/8 314/12 314/17
 indication [1] 35/3
 indications [1] 33/10
 indicator [1] 99/16
 indifference [3] 41/1 41/18 42/7
 indifferent [1] 41/10
 indirect [1] 168/8
 indiscernible [1] 178/12
 indisernible [1] 199/5
 indisputable [2] 16/6 17/3
 individual [18] 8/11 28/21 33/24 45/3
 55/17 56/3 58/17 58/21 148/6 148/20
 191/25 216/5 225/8 234/5 280/10
 304/16 304/18 310/14
 individual's [2] 58/7 225/12
 individuals [13] 7/12 8/15 30/21 38/11
 67/3 73/15 143/4 182/4 219/6 219/19
 304/11 311/15 312/1
 individuals' [1] 28/20
 inexcusable [1] 107/6
 inflicted [2] 193/13 193/14
 influenced [1] 282/5
 inform [6] 87/19 139/24 142/3 164/3
 176/19 214/4
 informal [1] 91/15
 information [162] 5/11 35/3 56/25 67/2
 73/19 74/3 74/6 74/22 74/22 75/12
 75/15 76/14 76/16 78/16 79/14 81/2
 81/5 81/14 82/4 84/21 84/23 84/24 85/5
 86/5 86/6 87/14 88/4 88/13 96/11 96/17
 98/12 109/5 113/3 113/18 114/21
 114/23 115/2 115/4 115/6 115/9 115/12

<p>information... [121] 115/14 116/7 117/2 117/8 118/6 118/8 119/6 121/20 122/4 122/8 123/5 123/11 126/21 127/3 127/17 128/1 129/2 130/6 130/15 138/6 139/18 140/1 140/4 140/6 140/18 142/16 142/17 143/12 144/18 147/1 155/25 157/10 157/25 158/11 159/10 159/15 160/5 165/9 165/11 175/12 177/2 178/9 178/13 180/10 182/3 187/20 188/6 190/10 191/3 191/9 191/9 191/13 191/13 191/14 191/23 191/25 192/17 196/15 196/18 196/19 196/23 196/24 196/25 198/21 199/10 203/16 208/12 209/16 211/3 214/24 216/14 229/10 235/7 236/20 237/21 239/1 239/2 239/20 239/21 240/15 246/16 249/24 250/9 251/1 251/4 251/10 251/11 251/14 255/19 262/15 263/25 266/7 274/21 280/19 283/7 283/19 284/12 286/13 287/9 287/12 287/14 291/13 292/9 292/11 292/15 292/16 294/16 294/23 305/9 305/11 305/12 306/3 306/7 306/11 306/14 306/22 307/2 307/9 311/12 314/19 318/20 informational [2] 293/20 293/24 informed [5] 130/14 141/18 141/24 176/15 242/14 inherently [1] 129/16 initial [42] 37/7 74/12 74/19 88/13 96/11 103/1 103/17 104/22 113/11 117/10 118/4 123/13 123/18 138/24 139/13 141/15 148/10 154/16 155/22 158/19 160/17 161/1 161/5 163/24 165/14 166/9 166/15 167/4 173/21 175/9 176/3 176/6 176/8 176/12 199/6 206/9 208/10 220/2 249/5 298/18 299/7 306/2 initially [15] 75/20 84/23 85/15 90/7 98/23 118/3 125/25 140/2 141/15 142/16 148/9 150/13 150/14 208/3 217/10 initiate [4] 95/11 99/25 125/2 164/21 initiated [11] 88/14 108/6 117/10 130/10 142/5 148/10 164/5 176/8 187/21 189/24 197/1 initiation [1] 165/9 initiatives [1] 202/19 injunction [27] 1/6 2/5 8/8 12/9 12/18 12/19 13/13 13/15 13/18 15/10 15/21 22/8 25/19 25/21 25/24 26/3 26/9 26/11 26/18 27/4 27/5 28/3 28/7 35/2 38/16 38/20 40/3 inquiries [1] 227/17 inquiry [1] 80/21 inside [1] 49/8 instance [11] 62/14 199/19 244/12 245/22 248/18 249/25 251/24 265/7 269/4 301/3 313/2 instances [1] 312/24 instead [6] 29/9 34/22 37/2 38/5 211/21 211/22 Institute [1] 137/5 institution [4] 25/4 108/23 145/15 282/14 institutions [4] 136/24 185/5 282/19 283/5 instruct [1] 300/20 instruction [3] 109/18 153/12 231/17 instructions [4] 231/18 237/2 237/4</p>	<p>251/8 instructive [1] 22/4 instructs [1] 230/20 integrity [4] 27/9 37/24 118/24 185/21 intend [2] 9/12 153/18 intended [1] 162/20 intensive [1] 138/7 intent [1] 255/23 intention [2] 60/13 132/17 intentional [1] 81/13 intentionally [1] 148/16 interact [1] 63/21 interacted [1] 297/18 interacting [1] 98/22 interaction [10] 53/24 62/23 77/5 90/11 95/20 99/2 151/2 172/6 173/4 185/16 interactions [9] 47/10 48/1 49/25 86/8 157/10 157/22 157/24 185/13 199/17 interest [4] 27/9 219/16 232/16 295/1 interfere [1] 191/12 interferes [1] 80/17 interim [1] 151/3 interject [1] 231/23 internal [1] 82/14 interpersonal [1] 137/21 interpret [1] 99/14 interpretation [3] 268/3 268/9 268/15 interpreted [1] 268/23 interrupt [8] 31/19 45/2 46/14 63/24 82/25 116/12 231/20 240/13 interrupted [2] 157/6 161/7 intertwined [1] 90/18 interview [3] 143/11 144/3 277/4 interviewed [3] 36/19 144/2 174/13 interviewing [2] 209/9 209/19 interviews [4] 87/20 144/2 209/21 266/6 intimate [1] 148/5 intimidated [6] 36/15 36/20 148/19 148/21 182/5 182/19 intimidation [2] 181/16 181/24 introduce [4] 44/24 61/17 137/19 328/10 introducing [1] 165/8 introduction [3] 145/10 164/4 230/20 introductory [1] 230/17 investigate [2] 36/25 263/7 investigated [3] 117/4 207/19 208/21 investigates [1] 263/8 investigating [4] 182/15 190/21 281/21 283/22 investigation [142] 23/10 33/6 35/24 42/4 43/14 43/16 73/2 74/24 74/24 75/14 81/3 84/25 87/7 87/13 88/15 90/22 90/23 91/1 95/11 96/1 96/4 96/12 100/1 100/5 106/12 107/9 108/6 112/23 113/11 115/7 115/19 117/2 117/8 117/11 117/14 117/23 118/4 119/10 120/7 129/16 129/19 130/10 131/22 133/14 134/4 134/24 139/11 139/20 139/22 141/8 141/11 141/14 142/5 142/9 142/13 143/1 143/7 143/8 143/15 144/5 146/10 146/16 148/10 148/23 150/21 150/25 155/17 157/14 157/19 158/21 159/7 159/11 160/4 160/22 160/24 161/6 164/5 164/8 164/22 165/10 168/11 168/22 170/17 174/14 174/24 175/9 175/12 176/1 176/9 176/22 178/15 179/9 179/12 179/16 180/8 180/16 181/18 188/7 190/25 191/5 196/3 197/1 198/18 199/8 199/12</p>	<p>203/25 205/9 206/10 208/4 208/25 210/7 224/8 239/5 240/12 258/24 265/2 265/8 265/9 265/10 265/13 266/2 266/6 270/17 272/1 276/11 283/19 284/23 287/22 288/4 288/10 292/12 299/3 304/8 306/17 307/7 307/10 307/12 307/15 307/23 309/10 309/11 314/11 investigation's [1] 270/9 investigations [17] 42/3 81/15 89/11 115/11 126/14 138/16 184/13 210/6 224/3 260/7 265/24 276/14 276/17 276/25 277/1 277/4 308/5 investigative [11] 39/6 125/14 159/17 160/7 175/8 210/15 237/19 238/5 246/5 262/7 264/19 investigator [17] 23/11 23/15 42/25 125/15 140/3 142/18 160/5 167/23 209/9 210/20 210/24 217/17 218/2 233/18 283/10 283/11 283/21 investigator's [1] 206/23 investigators [2] 89/6 138/10 investigatory [1] 29/22 invitation [2] 65/20 253/14 invite [6] 48/16 160/21 216/17 224/2 285/3 294/13 invited [2] 220/1 294/20 inviting [1] 153/8 involve [4] 78/16 97/8 192/20 309/24 involved [29] 29/20 29/21 34/21 58/17 58/21 60/4 67/5 75/10 76/25 78/2 83/18 108/24 117/23 139/10 149/4 149/6 149/7 161/21 183/18 184/14 191/15 196/5 209/1 224/14 279/6 309/8 312/24 312/25 324/4 involvement [5] 143/17 177/1 248/6 279/10 284/16 involves [1] 168/15 involving [13] 29/15 45/18 140/20 145/23 146/11 147/23 148/17 152/18 178/23 269/8 276/14 277/1 316/21 iPhone [1] 4/24 irregular [1] 190/13 irreparable [13] 14/21 16/3 16/5 16/7 17/3 17/6 18/20 19/4 19/18 25/5 37/20 38/13 38/21 is [1100] isn't [27] 11/16 16/13 17/5 18/22 33/13 35/8 35/16 39/7 82/21 214/6 217/14 217/22 228/4 232/15 233/10 256/18 259/18 262/14 269/18 270/1 271/23 275/24 297/22 315/18 317/5 317/10 319/1 issue [28] 4/15 11/23 12/21 37/20 38/13 38/18 41/24 42/22 91/2 98/6 130/14 146/10 148/7 148/22 161/1 167/11 198/17 199/1 199/2 199/4 199/14 208/14 212/21 213/25 256/25 257/11 282/7 305/16 issued [5] 103/20 142/5 207/10 207/24 243/22 issues [24] 80/24 98/1 137/1 138/2 138/13 138/17 148/9 184/21 211/12 212/18 212/24 214/2 219/8 227/15 228/22 258/9 259/9 261/15 265/19 269/8 269/20 276/15 305/2 305/6 it [950] it's [18] 3/23 27/10 82/11 82/13 84/20 89/22 98/8 121/3 121/4 130/19 131/9 169/23 176/1 228/2 239/17 293/2 296/24 316/2</p>
---	---	---

I
item [7] 188/5 188/15 188/25 188/25
189/9 206/17 289/22
items [1] 80/6
its [29] 22/10 27/9 27/18 27/19 29/3
29/4 29/5 29/6 29/7 29/11 30/15 33/23
38/24 42/24 79/23 147/11 149/22
180/19 180/23 185/25 199/12 205/1
207/9 258/20 276/15 282/15 292/18
300/2 303/15
itself [4] 22/2 27/5 170/17 210/8
IUPI [1] 283/6
IX [80] 4/20 5/23 9/1 19/5 19/23 21/3
22/5 23/9 28/7 30/22 33/19 34/13 40/13
41/1 41/25 43/5 57/8 69/25 69/25 70/8
70/9 70/16 70/22 70/24 71/17 72/5
72/10 72/19 72/22 73/8 74/1 80/8 82/9
82/16 87/9 98/6 109/3 109/12 109/25
114/25 121/24 121/25 122/1 122/3
124/9 124/12 124/13 136/8 136/13
138/2 138/9 138/12 138/15 139/8
139/11 144/21 149/13 149/20 170/6
170/9 173/16 178/15 185/18 190/18
191/21 192/7 194/16 194/20 206/14
206/24 207/10 217/15 217/17 218/1
219/7 230/7 240/10 309/21 310/2
315/14

J
jail [1] 282/11
Jane [80] 4/7 19/25 31/24 35/7 35/10
45/1 45/15 45/19 46/24 47/10 47/19
47/23 48/18 49/3 49/13 49/14 49/14
49/24 51/12 61/21 61/23 61/24 62/7
62/10 62/14 62/22 63/2 63/15 66/1
75/19 76/8 77/6 78/7 85/2 92/11 96/15
98/3 100/17 102/14 105/21 105/25
106/10 106/14 106/24 110/9 111/18
112/19 114/18 119/17 121/1 123/9
124/25 127/20 133/19 133/21 134/16
134/18 134/22 134/23 135/10 193/18
194/10 194/24 227/4 239/11 241/17
242/7 252/3 256/12 261/15 261/19
264/19 264/24 265/7 271/19 275/1
315/6 316/4 320/23 326/13
Jane Roe [20] 106/24 110/9 123/9
133/19 133/21 134/16 134/18 134/22
134/23 135/10 193/18 194/10 239/11
242/7 256/12 261/15 271/19 315/6
316/4 320/23
Jane Roe's [6] 105/25 106/14 227/4
261/19 275/1 326/13
Jane's [3] 101/2 101/17 119/20
January [12] 43/10 43/10 62/19 64/3
64/4 105/13 105/16 135/14 197/18
214/7 262/2 270/7
January 26 [1] 135/14
January 30 [1] 105/13
January 31 [1] 43/10
January 31st [1] 197/18
job [11] 18/21 18/24 23/23 70/15 71/20
83/5 130/21 183/21 265/16 273/6
273/11
JOHN [79] 1/3 2/4 2/20 2/22 2/23 2/25
19/25 35/6 44/25 45/13 45/19 46/1 46/4
49/21 51/13 51/18 51/20 51/24 56/25
59/12 59/19 60/4 61/20 62/3 62/8 62/12
62/19 62/25 63/1 63/3 63/7 63/13 64/6
64/12 66/1 66/11 68/3 94/6 94/7 94/8
94/12 94/22 96/19 98/3 98/21 99/6

101/14 101/18 101/23 102/21 102/25
107/2 111/6 111/11 112/11 113/8
113/10 137/23 114/19 116/5 119/25
124/18 124/25 127/20 133/18 135/11
135/13 135/13 194/3 194/15 194/16
238/14 241/17 248/1 256/25 261/16
264/20 271/2 326/8
John Doe [3] 62/12 111/6 135/11
join [2] 137/12 287/25
joined [2] 136/22 137/16
jointly [1] 98/10
Joseph [2] 103/21 241/16
jot [1] 300/21
joyous [1] 212/22
judge [10] 1/7 3/6 3/8 23/14 68/13
219/1 230/25 231/21 250/14 297/14
judges [1] 27/1
judging [2] 261/19 262/11
judgment [2] 88/1 306/20
Julie [1] 135/12
July [1] 24/12
jump [3] 95/12 153/18 306/1
jumping [1] 115/3
junction [1] 37/22
June [2] 195/17 201/9
June 1 [1] 195/17
junior [3] 45/1 61/23 186/18
just [209] 2/7 2/8 2/9 3/14 4/18 6/10 9/8
10/5 10/15 13/2 14/5 15/20 18/18 18/25
19/22 20/21 23/20 24/24 26/11 27/10
28/10 29/20 32/20 38/10 39/24 40/2
40/11 43/6 45/5 47/16 47/17 47/24 48/7
49/14 50/17 50/25 51/2 51/5 51/9 52/11
53/24 54/6 54/7 54/12 61/3 62/20 63/4
63/9 63/23 65/10 65/17 65/22 68/15
69/2 69/18 70/3 71/23 74/12 82/25
83/23 85/18 86/12 87/8 94/9 96/4 98/13
100/14 100/15 101/25 103/19 106/5
112/3 113/16 124/10 127/9 130/17
130/19 130/21 130/23 131/10 132/15
132/17 132/17 133/11 133/24 135/1
140/13 156/17 160/2 160/6 161/25
168/25 169/5 172/14 176/4 178/10
178/14 180/13 186/15 191/1 191/5
194/10 196/15 198/2 199/6 201/9
201/10 202/14 203/7 203/7 203/19
203/25 204/19 205/11 205/20 205/21
209/4 209/16 209/25 210/8 210/17
210/22 211/16 215/5 217/22 218/5
218/6 219/11 223/9 225/15 225/18
228/3 229/12 230/13 230/16 231/11
234/11 234/24 236/23 237/9 239/10
241/10 241/20 242/3 242/23 244/12
246/1 247/3 247/4 247/10 249/10 250/1
250/6 250/8 250/13 252/15 255/4 256/3
256/21 257/5 262/10 264/16 264/17
264/22 265/18 266/9 270/8 270/11
271/6 271/10 271/13 272/9 273/17
273/19 275/1 275/2 275/2 275/5 275/14
275/16 275/24 276/8 276/18 279/25
285/2 293/16 297/9 298/3 298/10
298/10 298/10 299/16 300/1 300/21
301/12 301/13 301/16 304/18 305/9
306/21 316/5 316/6 319/10 320/14
321/17 326/2 327/13 327/16 328/2
justice [6] 230/2 230/3 269/22 270/2
270/5 277/16
justify [1] 308/15

K
K-A-R-T-M-A-N [1] 26/7
Kalamaros [8] 106/20 125/05 142/9
143/8 174/18 175/9 208/25 209/18
Kalamaros's [1] 215/7
Karrah [2] 72/23 149/20
Karrah Miller [1] 72/23
Kartman [3] 26/5 26/7 26/15
keep [14] 106/9 106/14 121/3 150/4
169/12 196/5 196/8 196/12 196/17
196/18 227/1 230/21 303/7 316/25
keeping [2] 196/7 227/24
Kei [3] 97/13 97/14 128/18
Keller [1] 1/15
Keri [3] 97/13 97/14 128/18
kettle [1] 32/17
key [7] 20/7 50/7 50/8 50/9 214/23
228/23 292/14
kids [2] 32/3 32/3
kill [6] 85/4 92/25 154/21 297/2 297/5
304/23
killing [2] 193/1 304/20
kind [25] 13/24 19/8 23/22 24/5 49/5
50/16 50/17 80/2 83/9 85/8 89/10 91/8
100/9 125/3 130/19 134/2 137/2 186/19
187/9 187/13 189/8 230/15 261/21
263/5 302/19
kinds [1] 191/4
King [1] 16/7
knew [2] 53/20 156/15
know [146] 2/6 2/11 6/11 7/3 9/17
10/14 11/8 11/19 11/21 11/22 13/11
17/5 23/12 24/24 25/20 26/19 27/2 27/3
27/5 27/14 28/5 35/25 45/3 46/4 46/8
50/17 50/24 51/14 51/25 52/1 54/11
54/13 54/20 55/3 55/14 55/15 57/22
59/3 59/6 59/10 62/18 63/18 66/3 68/4
71/15 75/9 78/5 82/6 83/12 83/17 90/23
96/1 96/24 97/1 97/3 98/3 100/13 102/8
103/17 105/13 109/3 109/7 109/13
109/15 113/8 113/12 113/22 114/23
115/23 116/3 116/8 117/21 118/2
119/24 120/1 120/20 123/9 124/17
128/12 129/2 130/15 131/10 136/8
139/7 153/13 154/14 154/16 155/5
159/14 166/2 169/22 172/6 172/14
172/16 173/6 176/18 180/18 182/2
184/7 190/1 192/3 195/1 195/3 199/6
199/7 209/18 211/11 215/21 218/6
218/8 219/18 229/14 241/7 248/20
248/25 251/19 251/19 256/21 261/12
265/7 266/2 266/5 267/8 271/9 272/11
277/6 278/19 283/1 288/15 293/14
296/16 308/18 317/6 322/3 322/22
323/5 323/8 323/9 324/11 324/15 325/9
326/23 326/24 327/7 328/2 328/20
knowingly [1] 148/16
knowledge [7] 63/19 63/20 67/12 113/4
151/6 218/10 261/14
known [9] 8/24 44/25 61/20 61/21
202/17 203/6 203/11 207/22 279/4
knows [4] 20/17 29/21 209/18 295/11

L
labeled [3] 4/2 204/8 326/1
labeling [1] 198/21
lac [52] 29/10 30/19 31/7 31/14 33/4
33/17 33/23 113/25 114/1 117/21 140/5
140/6 142/22 143/3 144/14 144/22
144/25 145/7 145/9 147/3 149/1 149/3

L
 lac... [30] 149/4 149/21 176/2 202/17
 203/7 208/23 204/9 205/2 205/3 224/1
 263/1 270/10 271/13 275/16 279/7
 279/13 280/4 280/6 280/25 282/16
 287/5 289/23 290/21 293/19 295/5
 295/13 295/15 296/10 308/12 312/11
 lack [2] 177/16 245/25
 lady [1] 44/14
 Lahey [7] 1/23 2/18 70/20 70/21 71/15
 226/9 226/16
 language [12] 103/3 104/23 112/3
 204/1 211/17 211/19 242/1 242/2
 247/13 268/16 268/22 296/12
 laptop [1] 130/9
 large [8] 4/21 23/12 83/24 147/2 210/7
 294/15 299/3 316/4
 larger [3] 72/11 260/11 316/7
 last [21] 3/14 4/5 5/5 14/14 22/7 37/19
 46/15 53/4 83/8 89/14 89/16 95/8 138/3
 201/6 204/8 209/13 248/2 253/8 253/16
 262/21 283/12
 late [8] 3/22 5/5 32/1 96/21 262/1
 278/19 310/24 311/5
 later [27] 7/15 7/21 7/23 9/6 12/21 65/1
 69/2 76/19 107/23 116/10 120/19
 137/14 150/22 159/22 162/1 179/19
 194/14 194/14 213/10 261/14 262/4
 263/20 264/4 300/2 327/15 328/20
 329/4
 launch [1] 240/11
 Laura [1] 277/13
 law [16] 14/21 16/7 18/18 19/19 21/12
 28/8 29/12 35/12 37/18 38/7 41/15 43/4
 103/25 150/3 230/1 281/22
 lawsuit [6] 39/18 217/15 217/17 217/19
 217/20 217/21
 lawsuits [2] 217/23 218/1
 lawyer [1] 232/15
 lawyers [3] 6/7 89/12 248/25
 lay [1] 60/1
 layer [1] 27/25
 laying [1] 120/9
 lays [3] 26/1 214/14 214/20
 lead [2] 102/24 231/19
 leader [1] 139/3
 leadership [2] 137/24 201/21
 leading [2] 284/2 299/10
 learn [17] 73/25 73/25 81/5 85/16 90/20
 100/6 103/12 119/11 125/2 129/17
 139/4 139/14 143/18 149/23 176/14
 178/14 196/2
 learned [2] 141/15 254/18
 learning [1] 191/10
 least [21] 53/3 106/13 114/21 125/24
 126/12 138/4 139/9 140/19 153/19
 194/24 208/21 217/25 225/23 228/9
 266/17 290/17 294/25 296/11 307/6
 307/14 318/10
 leave [7] 156/24 169/6 172/11 212/14
 265/21 270/13 273/11
 led [2] 59/14 267/6
 left [10] 3/20 24/13 141/10 141/11
 147/25 182/6 239/25 288/23 301/12
 329/7
 left-hand [1] 141/10
 legal [7] 11/23 22/20 103/6 138/17
 218/8 233/1 282/9
 legitimate [2] 301/17 301/19
 legs [1] 301/13

LEICHTY [19] 1/18 2/14 5/13 5/20 7/9
 25/15 40/12 41/23 67/7 67/10 135/25
 188/4 826/6 330/4 330/7 330/11 330/11
 330/13 330/14
 Leichty's [1] 41/16
 length [3] 298/18 306/25 307/12
 less [5] 16/5 83/20 84/14 233/24
 269/11
 lessen [1] 38/13
 let [54] 4/17 7/7 7/10 24/14 24/16 25/17
 45/2 46/14 55/7 66/3 68/4 78/18 82/8
 94/25 104/3 105/4 110/2 121/11 129/22
 129/23 131/23 154/14 154/16 156/17
 158/14 159/14 176/18 182/2 205/20
 210/17 215/3 218/6 226/9 227/8 228/6
 230/16 244/3 244/12 247/10 249/10
 261/11 272/9 275/5 280/21 284/5
 285/13 288/19 300/16 302/9 302/15
 306/1 308/9 319/5 329/4
 let's [25] 8/9 8/13 15/9 15/20 24/11
 83/7 83/7 105/4 118/21 145/19 153/2
 156/5 157/17 157/17 159/9 171/11
 204/5 245/16 246/12 246/13 262/23
 271/19 288/7 304/10 307/6
 letter [108] 91/18 92/10 93/24 93/25
 94/16 94/21 94/22 95/6 95/7 95/8 95/23
 96/2 96/6 96/16 109/8 109/14 109/16
 109/17 110/9 111/16 134/22 146/12
 163/23 164/2 164/20 165/8 165/13
 166/11 167/14 167/17 172/12 172/17
 172/25 178/13 190/15 194/10 195/11
 195/12 197/19 197/20 197/24 197/25
 198/24 207/10 207/23 207/24 208/11
 208/18 211/22 214/14 214/14 214/18
 214/20 214/23 215/1 215/24 216/23
 217/3 217/4 218/14 218/17 220/4 220/5
 220/11 220/12 224/18 240/7 244/1
 244/2 244/13 244/21 244/23 245/4
 245/11 245/15 245/19 246/13 247/1
 247/13 247/25 248/13 248/15 255/3
 255/7 256/10 269/9 275/21 275/25
 276/1 276/3 276/18 277/6 285/3 285/17
 286/11 293/10 293/19 294/13 297/25
 298/3 298/7 298/10 298/11 298/13
 305/8 305/25 306/21 321/24
 Letter's [1] 248/4
 letters [3] 191/5 220/24 244/25
 letting [3] 43/11 96/1 261/3
 level [4] 21/19 33/16 78/12 118/22
 Lexus [1] 42/13
 liberal [1] 297/15
 lieu [2] 274/18 274/22
 life [7] 76/6 137/4 201/22 202/17
 212/15 279/14 280/13
 light [1] 153/15
 like [81] 2/9 11/11 12/7 12/20 13/8 14/2
 15/8 16/15 21/11 24/16 36/5 40/4 43/13
 47/24 49/15 50/8 59/9 59/20 77/1 79/2
 79/9 86/4 88/5 88/10 94/15 95/23
 100/20 104/21 105/12 111/23 111/25
 112/17 115/18 120/3 120/11 120/24
 123/13 123/18 131/1 131/14 136/7
 139/23 142/3 144/1 150/16 154/5 154/8
 175/19 176/15 185/17 194/18 195/17
 195/24 209/15 220/19 225/19 238/11
 238/12 240/19 240/23 241/25 246/25
 249/10 250/15 250/20 253/3 269/12
 282/9 285/1 285/18 289/3 296/16 298/6
 298/24 304/19 307/22 323/15 323/18
 327/22 327/25 328/2

likelihood [10] 16/3 19/3 19/9 19/10
 19/20 20/3 26/13 28/4 30/17 34/11
 line [16] 7/13 229/8 229/8 244/22
 287/14 317/15
 limit [5] 189/4 189/10 189/12 236/15
 323/4
 limited [2] 13/14 235/21
 limiting [1] 234/25
 Lindley [1] 73/9
 line [13] 28/16 28/23 72/19 73/12 73/13
 116/15 187/15 187/15 285/5 285/6
 301/19 304/21 304/24
 lines [2] 188/25 283/15
 link [3] 286/4 286/9 287/7
 linked [1] 280/18
 links [2] 286/6 286/12
 list [3] 204/12 204/17 235/11
 listed [7] 72/2 72/8 72/10 72/23 104/24
 203/20 287/18
 listen [4] 120/18 246/6 246/15 285/4
 listening [3] 244/16 245/8 245/13
 lists [2] 207/16 218/15
 litigating [1] 4/23
 litigation [1] 4/13
 little [37] 3/11 59/13 68/14 68/15 83/20
 86/7 86/12 95/13 103/24 115/10 126/16
 126/19 136/7 141/3 142/11 157/17
 158/9 161/7 162/17 168/1 169/6 180/14
 204/6 205/20 224/16 230/13 238/23
 241/11 266/9 266/18 267/3 281/25
 285/18 288/8 293/8 299/2 312/22
 live [7] 10/17 49/9 50/2 53/23 128/13
 145/16 325/11
 lives [2] 50/3 50/3
 Lizzie [2] 108/19 109/7
 LLP [1] 1/19
 local [2] 18/24 202/25
 located [2] 86/20 144/25
 location [3] 76/23 78/1 285/24
 lock [2] 50/7 50/8
 locked [1] 50/10
 lodged [5] 14/16 36/7 36/8 41/11 83/8
 log [1] 196/17
 logistics [2] 68/25 69/1
 long [25] 7/3 20/8 20/10 20/11 32/17
 32/18 53/1 53/5 73/4 90/14 91/9 136/9
 136/17 157/2 201/5 203/15 212/23
 228/8 258/24 272/8 284/8 288/1 296/10
 298/17 307/13
 long-term [7] 20/8 20/10 20/11 90/14
 91/9 212/23 228/8
 longer [7] 125/6 126/19 143/21 232/10
 232/25 233/4 274/4
 look [45] 21/24 22/4 26/11 40/21 40/22
 75/15 79/14 81/4 82/4 83/9 85/10 90/21
 90/24 99/23 103/18 106/6 111/3 122/10
 127/21 130/8 131/23 153/2 155/22
 159/9 163/20 178/21 192/23 193/22
 195/1 196/11 209/12 209/14 222/21
 241/11 244/14 267/9 273/18 282/9
 293/5 299/8 299/9 300/23 304/25
 316/23 322/8
 looked [19] 29/15 32/8 85/10 129/16
 163/25 178/10 183/1 183/17 210/20
 250/1 250/1 250/20 268/15 268/22
 275/20 282/24 305/8 305/9 306/25
 looking [20] 35/18 104/6 130/2 130/11
 132/4 190/20 190/23 209/19 209/20
 212/23 223/9 227/10 229/12 235/24
 251/1 251/6 264/7 270/10 276/18

L
 looking... [1] 328/19
 lookout [1] 80/28
 looks [21] 12/7 95/8 105/12 112/17
 115/18 120/3 120/24 123/13 123/18
 163/21 194/18 204/18 241/25 249/10
 253/2 253/3 253/8 255/2 255/3 267/7
 298/6
 Lord [1] 117/12
 lose [3] 18/21 232/6 232/7
 loses [1] 24/18
 loss [1] 106/24
 lot [28] 10/24 32/4 40/3 42/9 82/11
 115/10 116/20 116/22 118/13 128/1
 132/12 136/20 173/23 185/7 197/7
 209/13 210/5 211/16 227/5 257/20
 263/23 264/18 269/21 272/11 294/16
 299/15 319/14 328/1
 lots [3] 73/14 73/18 92/15
 Louisiana [1] 38/17
 low [1] 19/19
 luck [3] 60/19 68/12 264/5
 lucky [1] 273/10
 lunch [3] 125/11 132/15 132/16
 Lynn [11] 89/13 115/20 116/9 125/15
 128/21 142/9 143/8 174/18 175/9
 208/25 215/7

M
 ma'am [4] 9/22 69/14 199/24 200/16
 Mackie [1] 137/17
 Madden [1] 73/8
 made [71] 4/7 29/1 38/4 40/7 43/7 45/6
 47/8 47/20 47/25 48/2 48/12 48/13
 53/18 73/4 73/6 80/16 85/13 85/25 88/9
 90/1 107/2 110/6 114/17 114/19 117/16
 119/18 123/15 130/5 146/3 152/6 153/1
 162/25 176/12 176/17 177/12 180/19
 182/15 192/24 192/25 192/25 193/1
 215/4 216/3 221/24 222/5 225/14
 225/16 238/5 238/7 239/16 242/8
 243/21 251/11 251/22 252/16 257/15
 257/23 259/16 259/20 260/5 260/6
 261/5 263/12 265/22 271/7 283/9
 303/11 306/5 312/8 314/17 315/8
 magistrate [3] 3/6 3/7 3/10
 mail [83] 7/16 7/18 7/25 65/4 65/14
 65/17 76/13 95/14 95/24 95/25 96/5
 96/7 96/10 97/13 97/14 97/15 97/19
 97/21 97/21 98/4 100/20 101/2 101/7
 102/12 105/19 106/23 107/18 107/21
 108/15 111/17 112/6 112/11 112/17
 113/16 115/18 116/13 116/17 119/22
 120/25 121/9 121/13 121/18 123/4
 123/18 128/4 128/12 128/13 128/21
 129/7 129/11 130/11 134/16 134/17
 134/21 134/25 135/10 135/11 135/13
 152/10 152/12 152/16 153/3 153/18
 153/20 155/22 169/23 172/20 182/23
 185/15 197/15 197/16 197/22 197/24
 241/5 241/11 241/25 260/15 261/1
 284/25 287/24 288/11 314/25 328/6
 mailed [1] 327/22
 mailing [2] 65/15 65/16
 mails [26] 97/7 100/22 107/24 108/1
 111/1 111/5 123/13 130/8 131/17
 131/21 133/15 135/9 151/10 151/25
 152/23 155/23 178/22 183/2 183/17
 183/20 184/1 193/22 193/23 194/22
 197/12 291/4

main [3] 67/4 86/21 185/6
 maintain [6] 16/19 25/19 27/7 27/23
 48/19 220/6
 maintaining [1] 3/2
 maintains [2] 15/15 147/11
 major [6] 191/9 191/22 192/15 193/9
 202/5 283/5
 majority [1] 220/22
 make [88] 5/4 6/15 10/13 13/2 18/15
 19/8 23/20 26/21 28/13 30/4 36/1 37/19
 40/7 40/8 45/24 51/5 51/18 53/9 53/22
 54/8 59/20 61/3 61/8 65/1 65/22 68/6
 69/3 69/18 73/3 73/22 75/2 77/16 80/21
 81/24 88/1 88/15 88/24 94/9 95/9 96/14
 98/9 103/5 107/8 110/8 112/3 118/10
 118/25 119/7 121/16 121/25 130/2
 130/16 131/13 135/8 142/14 143/20
 154/22 158/23 176/4 176/5 176/7 178/5
 181/11 184/14 191/23 192/7 193/8
 199/7 211/5 230/9 231/13 246/4 246/16
 249/1 250/16 250/17 260/13 265/12
 265/15 274/22 275/6 288/9 299/15
 307/12 308/7 320/3 322/15 329/6
 maker [1] 143/21
 makers [1] 42/24
 makes [9] 82/9 111/23 119/5 141/7
 155/16 199/13 231/11 233/19 263/6
 making [31] 41/7 41/22 51/16 70/10
 71/18 73/6 81/10 111/21 129/15 139/14
 154/20 175/25 176/3 178/19 182/24
 185/24 190/12 211/8 224/17 228/13
 230/17 238/17 249/2 255/9 257/25
 258/5 261/6 262/8 282/17 297/25
 316/10
 male [16] 20/1 21/4 21/22 22/3 29/5
 34/7 38/25 40/17 40/17 42/18 43/1
 80/22 109/4 309/19 310/3 313/15
 males [1] 197/10
 man [12] 33/24 44/11 58/9 58/12 80/19
 186/7 309/24 312/25 313/2 313/4 313/5
 313/12
 manage [10] 82/23 103/6 103/7 114/16
 204/22 219/2 219/3 237/12 283/14
 288/16
 managed [5] 91/14 99/3 102/1 103/4
 260/7
 management [2] 137/1 201/24
 manages [2] 114/12 121/22
 managing [5] 98/1 110/10 110/21 202/4
 246/9
 mandatory [1] 26/9
 manic [1] 99/15
 manipulation [1] 22/11
 manipulative [1] 150/16
 manner [6] 91/15 205/22 222/14
 258/25 324/17 325/14
 manually [1] 245/14
 many [21] 39/4 39/7 83/8 83/18 89/6
 89/20 139/3 149/7 166/3 174/16 226/14
 246/18 269/18 273/8 273/10 282/22
 282/22 284/10 290/11 292/3 320/16
 many and [1] 320/16
 March [16] 120/4 121/9 178/21 179/7
 179/8 180/4 180/5 220/12 241/5 241/12
 243/21 243/22 243/25 245/19 252/4
 253/6
 March 20 [1] 243/25
 March 20th [4] 180/5 220/12 243/22
 245/19
 March 27 [1] 253/6

March 27th [4] 179/7 179/8 180/4 252/4
 March 8th [3] 121/9 241/12 243/21
 March 9th [1] 241/5
 mark [7] 15/4 128/5 223/10 243/24
 272/16 272/18 314/14
 marked [57] 91/22 94/25 102/10 106/17
 107/17 108/8 110/2 113/25 119/12
 131/17 132/10 134/12 135/21 146/22
 147/19 151/9 152/4 155/13 156/18
 163/15 164/16 165/4 171/6 172/3
 173/11 174/9 175/6 177/8 203/8 204/3
 207/6 216/19 223/13 241/4 243/24
 253/5 254/23 260/12 278/5 280/21
 281/17 285/13 285/14 288/19 289/19
 299/21 300/1 303/18 315/3 315/5
 320/21 321/2 321/9 322/5 322/6 325/23
 326/20
 market [3] 1/12 273/14 273/15
 marking [1] 126/3
 Mary's [7] 55/18 57/23 58/4 58/10
 58/12 58/15 108/24
 Master [1] 137/23
 Masters [1] 279/3
 material [3] 160/3 160/11 290/1
 materials [16] 74/13 159/22 209/10
 210/1 242/20 249/20 287/22 288/10
 289/8 290/5 290/9 290/11 290/18
 290/21 299/4 299/6
 math [1] 126/16
 matriculate [1] 144/13
 Matt [4] 2/18 70/19 70/21 226/16
 matter [34] 8/9 8/13 12/20 22/16 26/23
 66/4 75/10 75/23 91/4 91/7 106/16
 145/23 155/24 158/2 177/25 199/14
 204/19 206/4 206/20 223/11 228/9
 255/11 259/3 270/17 270/20 270/23
 271/2 271/12 308/18 315/14 317/8
 323/17 326/25 329/14
 matters [10] 9/1 9/2 186/1 204/18
 204/20 205/3 218/8 218/20 257/7 257/8
 Matthew [1] 1/23
 maximum [2] 59/5 59/6
 may [73] 5/2 11/5 11/12 11/15 11/15
 11/17 13/13 17/24 23/23 37/12 44/17
 44/17 61/8 61/10 64/1 69/10 69/18
 76/23 85/20 114/7 116/10 116/14 117/3
 117/9 130/15 131/14 140/11 154/9
 155/25 162/4 163/25 164/14 166/22
 167/23 176/11 182/18 198/8 199/4
 199/5 199/16 199/17 199/24 200/17
 205/18 207/21 209/13 210/20 211/24
 212/18 219/18 231/15 231/16 232/20
 235/11 244/20 244/24 246/10 246/25
 263/7 263/10 272/10 279/22 280/8
 290/24 294/22 295/21 296/1 299/17
 317/22 319/3 321/12 328/20 328/21
 May 12th [1] 11/17
 May 8 [1] 11/12
 May 8th [3] 11/5 11/15 328/20
 May 9th [1] 328/21
 maybe [26] 9/19 10/3 11/7 13/16 37/4
 50/15 74/15 125/25 131/13 178/22
 186/16 214/6 215/13 215/15 245/9
 249/9 255/18 266/17 271/23 281/8
 284/14 298/19 298/25 308/13 326/2
 328/9
 me [157] 2/6 3/11 4/17 4/24 7/7 7/10
 7/25 9/3 9/5 9/8 9/10 10/15 11/7 12/3
 12/7 24/17 25/17 32/20 34/7 35/10
 39/16 43/11 43/12 43/25 45/2 46/14

<p>M me... [131] 47/5 48/14 48/18 53/22 54/22 56/7 65/20 59/49 62/1 62/26 64/14 65/5 66/3 66/11 73/15 78/18 82/8 83/22 85/3 85/17 89/19 92/22 92/24 94/25 104/3 110/2 110/3 112/18 117/5 120/24 121/6 121/11 121/13 128/21 128/25 129/22 129/23 130/20 130/21 131/18 131/23 140/23 141/18 142/3 142/16 150/12 156/17 158/14 158/22 176/15 179/5 182/10 185/2 188/21 203/23 204/1 204/17 205/13 205/20 205/23 207/16 208/11 210/17 210/22 212/12 214/16 215/3 216/6 216/21 217/20 217/24 218/6 220/1 220/4 221/12 222/8 225/15 225/18 226/3 226/9 227/8 228/6 228/6 230/16 232/18 238/4 240/11 240/23 240/24 240/25 241/21 241/23 241/23 244/3 244/12 247/10 249/10 249/10 250/19 250/20 253/3 261/3 261/4 261/5 261/11 268/18 272/9 272/16 272/19 274/9 275/5 280/21 281/8 284/5 285/13 288/19 293/16 296/19 298/10 300/16 302/9 302/15 304/23 306/1 307/22 308/9 313/5 323/7 324/9 326/24 329/4 mean [41] 11/16 12/16 39/15 39/17 46/15 48/9 70/17 77/24 78/18 81/2 85/25 89/22 91/8 94/7 101/7 101/8 103/9 109/9 109/9 109/11 110/19 110/21 115/11 130/17 130/19 130/24 155/2 189/12 190/18 224/8 231/20 235/17 287/6 289/5 296/17 296/20 301/8 303/5 303/9 321/22 328/3 meaning [2] 213/21 239/22 means [4] 77/9 79/22 98/11 283/18 meant [7] 80/8 102/23 112/3 136/25 179/12 234/19 281/22 measurements [1] 215/21 meat [1] 177/25 media [2] 42/16 157/24 mediate [2] 269/8 269/11 mediated [1] 91/4 medical [5] 117/1 117/8 124/4 130/6 130/14 Mee [1] 229/24 meet [29] 2/6 8/1 68/15 73/20 73/24 76/15 77/2 98/13 125/24 126/1 139/14 142/19 155/24 156/1 156/5 165/22 172/16 172/22 205/1 246/10 263/25 279/18 285/1 285/3 298/3 298/4 298/8 298/9 316/10 meeting [52] 7/11 42/21 73/22 82/16 87/18 96/22 96/23 98/13 99/19 123/19 125/22 140/2 153/8 153/19 153/25 156/7 156/11 157/2 157/4 158/8 158/19 158/21 159/18 160/17 161/1 165/14 166/9 166/15 167/4 167/13 169/16 172/25 173/21 195/5 212/18 214/9 228/4 247/17 266/22 292/5 293/20 293/25 294/6 294/8 294/10 298/2 298/14 298/17 298/18 298/19 305/13 316/14 meetings [7] 98/14 158/23 191/25 196/4 268/12 279/21 283/4 Melissa [1] 73/8 member [9] 111/1 111/16 161/10 211/3 216/3 220/25 251/9 277/15 300/22 members [11] 73/17 112/4 215/4 217/8 219/17 243/2 251/22 263/2 270/6</p>	<p>299/11 300/8 memo [1] 76/13 memoirs [1] 299/23 men [10] 34/9 38/1 89/20 89/21 89/23 89/23 90/6 183/14 295/25 310/6 mental [15] 98/21 98/21 99/6 99/7 191/18 224/2 224/13 225/20 228/22 228/25 228/25 228/25 231/6 231/7 297/21 mention [6] 34/16 58/8 101/23 192/6 231/21 295/7 mentioned [16] 29/16 52/13 54/9 68/3 77/21 77/23 96/19 123/21 126/9 130/1 155/2 193/17 280/8 299/7 312/4 312/24 mentioning [1] 222/8 mentions [1] 101/18 merely [1] 214/21 merit [2] 250/2 250/23 merits [11] 13/16 14/16 14/24 16/4 16/13 19/3 20/3 24/12 26/14 28/5 30/17 message [4] 9/3 275/3 297/10 311/8 messages [40] 4/8 5/21 23/10 23/11 23/16 31/22 33/7 92/25 157/23 195/19 210/25 222/4 236/10 241/17 242/7 244/20 255/23 256/16 260/1 274/19 301/17 310/22 311/1 311/11 311/14 311/21 312/1 315/7 316/22 318/16 319/11 319/14 320/12 321/20 322/22 324/5 325/25 326/8 326/9 326/13 messaging [2] 316/12 317/3 met [16] 18/14 94/12 98/3 141/17 142/6 150/8 154/25 155/2 156/3 182/7 182/20 182/21 194/4 213/1 263/24 316/20 Michigan [2] 1/20 137/22 microphone [3] 61/9 69/19 103/24 mid [2] 130/5 177/22 mid-February [2] 130/5 177/22 middle [4] 140/24 141/1 240/22 295/8 might [47] 3/4 3/19 6/5 8/19 15/20 23/19 32/22 53/17 66/11 68/21 73/15 73/16 73/17 74/13 78/5 78/22 93/20 94/15 105/14 116/6 124/11 132/19 143/18 144/23 149/15 162/1 169/10 180/5 188/19 191/3 191/12 196/11 199/1 208/13 219/15 220/20 225/19 226/1 228/13 228/14 229/4 230/10 233/3 233/20 256/24 274/23 285/14 Miller [2] 72/23 149/20 mimic [1] 281/22 mind [12] 41/3 48/3 50/16 51/3 80/5 80/23 101/22 112/13 126/25 141/25 142/2 230/21 minds [1] 294/22 mine [2] 50/4 232/1 minimum [1] 246/3 ministry [2] 93/18 166/12 minor [2] 77/1 78/4 minute [11] 50/4 59/13 68/17 72/12 169/10 169/11 200/1 237/16 249/18 263/17 273/22 minutes [23] 9/18 10/3 49/6 49/20 54/21 54/24 55/4 55/13 55/18 56/12 56/17 59/6 125/9 132/24 157/3 187/15 200/2 200/2 246/11 274/6 298/19 298/25 319/7 mirrors [1] 234/2 misconduct [8] 28/22 28/23 41/14 166/23 204/13 207/14 218/20 276/15 missing [3] 36/12 101/18 104/10 mixed [1] 202/9</p>	<p>model [9] 20/19 39/5 39/6 39/6 233/18 283/10 283/11 283/21 284/1 modifications [1] 190/6 modify [1] 282/22 modules [1] 144/18 mom [5] 100/17 100/19 105/22 106/14 317/1 moment [8] 47/16 156/17 162/7 198/8 288/7 308/10 310/17 312/16 moments [2] 262/4 273/17 Monday [6] 182/5 182/7 290/6 291/2 291/3 291/4 money [1] 232/6 Monroe [20] 38/17 65/16 87/5 216/25 217/4 217/10 217/14 218/22 230/16 231/11 234/12 300/4 300/6 300/9 300/13 301/4 302/4 302/10 302/16 302/21 month [6] 13/15 15/9 16/13 32/17 32/18 64/10 months [16] 13/19 16/13 73/5 83/5 83/8 89/17 141/24 142/2 164/22 212/19 212/19 213/9 213/9 239/5 296/21 297/5 more [81] 20/14 20/14 20/15 21/22 22/19 24/25 32/14 41/11 54/20 57/14 71/8 73/25 74/3 82/6 83/2 83/4 83/25 85/16 86/7 86/12 90/11 91/15 93/2 98/6 100/6 101/23 109/5 113/18 114/13 117/23 118/20 119/11 123/1 126/12 129/17 132/12 136/7 138/8 139/14 142/11 142/12 143/2 150/17 158/9 162/18 176/11 178/14 186/15 186/17 187/23 190/2 195/12 196/2 199/8 204/6 215/21 221/12 228/10 229/8 229/8 241/11 244/22 255/18 261/11 273/19 274/22 275/14 285/19 286/13 287/14 288/8 289/22 291/7 296/19 299/9 301/20 306/22 306/22 315/13 319/7 323/10 morning [38] 2/14 2/16 2/19 2/21 4/1 4/15 4/25 5/2 5/12 5/19 6/16 6/21 7/15 7/23 8/7 9/1 9/6 9/7 44/12 44/12 44/21 44/22 45/10 52/9 52/10 61/4 61/14 61/15 67/10 69/14 69/23 69/24 141/3 150/7 151/16 178/23 183/1 291/4 most [8] 9/17 10/4 15/7 15/19 138/5 219/8 233/16 291/21 mother [10] 100/18 101/2 106/23 107/21 108/15 128/4 183/18 193/21 193/23 227/4 motion [7] 241/15 242/6 296/16 296/20 311/8 311/13 311/21 motioned [1] 123/9 motivated [3] 40/16 42/25 226/1 motivation [4] 191/1 224/24 226/5 226/5 motive [2] 259/14 262/11 move [44] 7/6 76/20 79/18 79/21 80/1 85/25 86/1 87/16 87/17 88/5 88/10 88/11 103/24 118/17 119/1 137/8 141/19 146/17 147/14 147/24 150/1 155/6 165/1 169/11 171/1 171/24 174/4 175/19 177/3 184/13 218/12 258/21 260/8 260/23 269/25 277/22 281/13 289/11 300/2 303/15 303/20 320/8 327/19 328/12 moved [11] 20/4 73/10 85/11 85/15 106/12 106/15 107/9 137/9 241/15 258/20 260/21 moves [2] 143/16 260/9</p>
---	--	---

M
moving [14] 14/11 23/18 77/8 86/2 86/9
106/10 106/14 127/10 127/13 34/24
212/8 265/1 276/10 305/20
MP3 [1] 245/12
Mr [73] 2/24 5/1 6/3 6/8 7/9 7/16 7/19
7/21 8/9 9/14 12/23 14/17 14/18 16/7
22/15 24/12 25/15 25/22 25/23 27/10
27/12 30/6 30/23 31/3 33/11 34/4 34/6
34/20 36/4 36/23 37/5 37/12 38/14 40/7
40/12 41/7 41/16 41/20 41/23 43/7 56/4
56/6 56/13 56/17 58/9 58/16 58/21
59/15 63/12 67/7 67/16 67/22 68/1
95/24 135/25 140/21 142/6 167/8 188/4
235/5 278/11 323/8 330/4 330/4 330/5
330/7 330/7 330/9 330/10 330/10
330/11 330/13 330/14
Mr. [233] 4/18 5/8 5/13 5/14 5/20 5/22
7/11 8/25 23/2 29/19 29/24 36/3 61/10
68/3 68/9 69/10 71/15 85/20 96/19 97/1
103/19 103/23 105/22 116/12 121/18
125/6 131/11 131/25 134/1 142/14
142/19 143/4 145/23 146/11 151/4
151/7 151/8 151/18 151/18 152/24
153/6 153/20 154/1 154/19 155/1 155/9
155/18 156/8 156/10 156/20 156/25
157/2 157/7 157/18 158/7 158/18 159/3
159/7 159/18 160/16 160/25 161/17
163/1 163/5 164/1 165/13 166/8 166/14
167/22 168/12 170/15 173/20 173/25
174/21 177/13 178/3 178/5 178/19
179/5 181/8 181/10 182/24 183/1 183/5
183/17 186/16 187/1 187/10 190/4
195/21 197/15 197/16 197/20 198/24
199/16 200/11 200/12 200/22 200/24
206/10 206/18 207/18 208/8 208/12
211/14 213/14 213/20 215/24 216/24
217/12 218/14 224/19 224/23 224/24
225/21 226/9 227/11 234/25 236/19
237/14 237/19 239/9 240/22 241/12
242/3 243/16 243/18 247/14 248/22
249/10 250/20 252/3 252/9 253/1 253/6
253/23 255/9 256/1 256/13 257/16
257/23 258/18 259/4 259/20 259/25
260/16 262/2 262/4 263/20 264/12
264/14 266/3 266/11 266/22 268/23
272/8 273/5 274/18 274/21 275/4
275/14 275/19 275/21 277/23 278/17
279/6 280/21 281/20 284/19 284/22
285/10 285/20 286/2 286/12 286/15
287/5 287/9 287/21 288/9 288/20
288/23 289/6 289/22 290/14 290/17
291/11 291/13 291/17 292/1 292/7
292/15 292/23 293/21 294/7 294/13
294/25 298/13 298/15 299/18 299/22
300/13 301/4 301/24 302/1 302/10
302/22 302/25 303/3 303/25 305/13
306/2 307/16 308/20 310/20 311/20
312/21 314/1 314/17 314/17 315/5
316/21 316/24 316/25 317/10 317/24
318/12 319/10 320/3 320/3 321/19
321/21 324/4 326/9
Mr. Agostino [12] 69/10 85/20 103/19
103/23 116/12 125/6 131/11 131/25
155/9 183/1 183/17 187/1
Mr. Anderson [2] 264/12 264/14
Mr. Doe [157] 134/1 142/14 142/19
143/4 145/23 146/11 151/4 151/7 151/8
151/18 152/24 153/6 153/20 154/1
154/19 155/1 155/18 156/8 156/10

156/20 156/25 157/2 157/7 157/18
158/7 158/18 159/3 159/7 159/18
160/16 160/25 161/17 163/1 163/5
165/13 166/8 166/14 167/22 168/12
170/15 173/20 173/25 174/21 177/13
178/3 178/5 178/19 179/5 181/10
182/24 183/5 187/10 190/4 195/21
197/15 197/16 197/20 198/24 199/16
200/24 206/18 207/18 208/12 211/14
213/20 215/24 216/24 217/12 218/14
224/23 225/21 227/11 236/19 237/14
237/19 239/9 240/22 241/12 243/16
243/18 247/14 248/22 249/10 252/3
253/1 253/6 253/23 255/9 256/1 256/13
257/16 257/23 258/18 259/4 259/20
259/25 260/16 262/2 262/4 263/20
266/11 266/22 268/23 273/5 274/18
274/21 275/19 275/21 284/19 284/22
285/20 286/2 286/12 286/15 287/5
287/9 287/21 288/9 288/23 289/6
290/14 290/17 291/13 291/17 292/1
292/7 292/15 292/23 293/21 294/7
294/13 294/25 298/13 298/15 299/22
300/13 301/4 302/1 302/10 302/25
305/13 307/16 308/20 311/20 314/17
314/17 316/21 316/24 316/25 317/10
317/24 318/12 320/3 321/19 321/21
324/4 326/9
Mr. Doe's [13] 164/1 206/10 213/14
224/19 224/24 234/25 242/3 250/20
266/3 302/22 303/3 306/2 314/1
Mr. Gallinaro [3] 23/2 61/10 68/9
Mr. John [1] 68/3
Mr. Lahey [2] 71/15 226/9
Mr. Leichty [2] 5/13 5/20
Mr. Ryan [1] 8/25
Mr. Stackman [4] 96/19 97/1 105/22
151/18
Mr. Willerton [35] 4/18 5/8 5/14 5/22
7/11 29/19 36/3 121/18 181/8 186/16
200/11 200/12 200/22 208/8 252/9
272/8 275/4 275/14 277/23 278/17
279/6 280/21 281/20 285/10 288/20
289/22 291/11 299/18 301/24 303/25
310/20 312/21 315/5 319/10 320/3
Mr. Willerton's [1] 29/24
Mrs. [1] 136/3
Mrs. Ryan [1] 136/3
Ms [3] 4/24 330/13 330/14
Ms. [160] 3/11 4/19 4/25 5/1 5/7 5/8
5/13 5/13 5/20 5/23 7/12 11/1 27/11
27/12 29/20 29/21 30/5 31/4 33/10
34/21 36/3 36/3 36/15 37/6 37/13 38/10
39/23 41/8 41/20 45/22 52/13 53/5 53/9
53/19 55/8 57/11 57/23 57/25 58/6
58/13 60/22 69/13 69/23 98/20 133/5
133/25 136/8 140/16 140/21 141/4
142/14 142/19 143/4 143/8 145/3
146/25 147/22 150/8 150/13 151/24
153/13 155/16 162/7 162/12 163/4
163/18 164/2 164/19 164/20 165/7
165/18 166/1 168/12 168/17 170/15
173/11 174/12 174/18 174/21 175/7
177/12 177/19 178/6 178/20 178/23
181/12 183/2 183/8 183/18 197/19
198/16 208/12 208/19 209/18 211/11
218/22 218/22 221/17 221/24 227/11
229/23 230/16 231/11 234/12 235/2
236/19 237/13 237/17 240/24 243/13
254/11 257/15 257/25 258/4 258/5

258/19 259/4 259/20 259/25 260/17
262/3 266/3 274/4 275/8 277/13 277/18
284/16 284/17 290/8 291/9 294/8 300/4
300/6 300/9 300/11 300/13 301/4 302/4
302/10 302/16 302/21 307/15 308/19
311/20 314/2 314/16 316/9 316/10
316/16 316/18 316/20 316/21 316/24
316/24 317/12 317/24 320/4 323/18
324/1 326/10
Ms. Anna [1] 165/18
Ms. Detlefsen [1] 163/4
Ms. Doe [3] 221/17 284/16 290/8
Ms. Eaton [1] 98/20
Ms. Hamill [4] 3/11 11/1 39/23 274/4
Ms. Heather [1] 60/22
Ms. Hunt [1] 218/22
Ms. Kalamaros [1] 209/18
Ms. Laura [1] 277/13
Ms. Lynn [2] 143/8 174/18
Ms. Monroe [13] 218/22 230/16 231/11
234/12 300/4 300/6 300/9 300/13 301/4
302/4 302/10 302/16 302/21
Ms. Pruitt [4] 4/25 5/7 5/13 5/20
Ms. Roe [82] 27/11 30/5 31/4 33/10
34/21 36/15 37/6 37/13 38/10 41/20
45/22 52/13 53/5 53/9 53/19 55/8 57/11
57/23 57/25 58/6 58/13 133/25 140/21
141/4 142/14 142/19 143/4 150/8
150/13 153/13 155/16 164/2 164/20
168/12 168/17 170/15 174/21 177/12
177/19 178/6 178/20 178/23 181/12
183/2 183/8 197/19 221/24 227/11
229/23 235/2 236/19 237/13 237/17
240/24 243/13 254/11 257/15 257/25
258/5 258/19 259/4 259/20 259/25
260/17 262/3 275/8 284/17 291/9
300/11 307/15 308/19 311/20 316/9
316/20 316/21 316/24 316/24 317/12
317/24 320/4 323/18 326/10
Ms. Roe's [7] 41/8 183/18 258/4 266/3
277/18 314/2 324/1
Ms. Roes [1] 27/12
Ms. Ryan [35] 4/19 5/1 5/8 5/13 5/23
7/12 29/20 29/21 36/3 36/3 69/13 69/23
133/5 136/8 140/16 145/3 146/25
147/22 151/24 162/7 162/12 163/18
164/19 165/7 166/1 173/11 174/12
175/7 198/16 208/12 208/19 211/11
294/6 314/16 316/10
Ms. Ryan's [2] 316/16 316/18
much [22] 4/12 9/15 10/21 21/14 30/15
52/21 54/17 54/22 74/5 74/21 102/3
115/11 125/6 160/18 171/14 173/17
179/19 181/9 254/4 272/4 274/4 282/8
multiple [4] 27/19 108/1 244/23 288/16
must [5] 221/25 234/14 234/20 236/25
288/4
mutual [3] 47/19 47/22 49/12
my [107] 2/8 4/24 7/19 8/11 12/1 14/8
16/10 24/17 25/18 29/16 34/7 36/2 41/3
44/25 45/1 46/18 47/21 47/22 48/11
48/25 49/3 49/10 49/12 49/13 53/4
53/22 54/19 59/11 61/20 61/21 63/20
65/10 65/20 67/10 73/10 82/2 84/17
87/18 90/5 99/12 101/15 103/25 104/20
108/23 112/14 114/16 115/24 118/19
120/1 120/13 121/13 126/16 127/22
131/9 131/21 135/3 137/21 137/22
146/14 149/16 154/6 155/22 157/5
172/10 173/7 176/8 179/15 181/9

M
my... [39] 188/23 196/6 197/11 200/24
21/15 212/15 218/2 228/18 229/24
235/16 237/11 238/10 238/23 239/17
240/21 241/19 246/24 250/16 267/3
268/11 269/14 273/23 277/11 277/20
277/23 279/12 279/12 279/18 288/21
290/12 299/14 299/14 313/17 313/22
316/22 318/3 318/6 327/23 328/19
My degrees [1] 99/12
myself [13] 47/23 48/13 66/4 85/4
85/15 136/5 211/4 216/4 297/2 299/11
299/12 304/20 304/23

N
name [21] 44/8 44/23 51/15 55/7 58/7
58/8 58/19 59/18 63/14 65/10 65/10
67/10 70/3 116/12 124/21 186/16
200/24 200/25 223/16 229/23 294/2
named [1] 182/4
names [4] 28/20 61/17 65/10 196/13
narrow [5] 14/15 14/17 17/2 221/3
225/7
narrowest [1] 16/19
national [1] 138/16
nature [18] 33/9 37/15 38/2 70/14
76/25 84/2 84/9 84/10 85/18 90/12
99/20 148/6 150/14 154/5 177/25 178/8
187/2 260/10
navigate [1] 184/23
navigating [1] 158/1
NDSP [3] 93/14 101/4 103/3
near [6] 30/16 167/23 186/9 259/6
302/24 310/15
near-graduating [1] 30/16
necessarily [9] 17/5 23/12 90/12 94/3
96/3 119/4 131/4 210/13 304/17
necessary [4] 20/15 20/15 285/4
321/22
need [41] 6/5 9/4 13/5 13/25 20/13
20/13 24/25 36/17 44/13 48/10 48/21
50/7 50/8 61/5 71/9 80/24 90/23 98/2
98/8 115/15 116/14 125/1 155/24 162/9
162/23 201/16 206/4 212/13 214/3
219/9 241/6 255/15 261/11 268/19
273/23 275/4 289/12 300/25 319/8
322/15 327/3
needed [14] 6/4 7/18 8/1 9/3 9/10 66/7
99/18 111/13 137/2 149/5 192/11 222/2
243/14 292/3
needs [13] 16/24 28/9 30/23 34/22
166/25 204/25 205/16 282/13 283/16
294/23 305/20 305/24 312/5
negate [1] 240/2
negligible [1] 19/9
neither [2] 168/8 234/15
NEMETH [2] 1/15 2/25
never [12] 9/5 9/9 15/16 24/5 50/24
66/14 67/15 238/5 250/1 255/22 261/1
307/19
new [35] 21/18 21/25 21/25 83/15
122/8 179/19 180/10 191/9 202/20
237/13 238/4 238/6 239/11 239/13
239/15 239/24 240/3 240/11 240/22
240/25 240/25 241/13 242/8 243/8
249/23 250/9 251/4 251/11 251/14
263/24 267/9 306/11 307/2 308/13
318/11
newly [1] 249/13
next [26] 4/1 12/2 12/3 27/14 65/21

65/25 69/10 71/21 74/25 87/17 87/18
139/12 139/17 156/4 165/21 176/13
180/12 200/9 211/6 286/4 287/11
287/23 292/10 294/4 304/24 328/24
nice [3] 28/12 204/17 273/12
nicer [1] 173/17
night [26] 3/21 4/5 5/5 20/17 20/18 47/7
47/10 47/17 47/22 48/4 48/19 51/17
52/19 52/20 52/21 56/24 57/10 59/14
59/16 59/19 291/3 291/3 296/25 297/1
301/14 318/11
nine [1] 134/17
Ninth [1] 27/3
no [273] 5/14 9/7 9/7 20/12 22/24 25/9
33/22 35/10 36/13 41/21 43/9 46/11
46/25 49/9 52/18 53/14 53/16 53/22
55/14 55/16 58/19 58/19 58/23 60/10
60/15 62/11 63/3 63/17 63/20 63/22
64/18 66/14 67/17 67/21 67/22 68/7
71/13 71/18 73/3 77/7 77/12 77/18
77/20 80/3 86/23 88/9 88/23 88/23
94/23 95/25 96/3 96/16 96/25 98/17
99/10 99/12 99/17 100/11 100/15 102/5
102/7 103/7 105/3 107/11 107/14 108/7
110/20 112/1 113/24 116/3 118/6 124/2
132/7 133/24 134/8 134/9 134/12
135/18 140/2 142/5 143/18 143/21
143/25 146/20 146/22 147/17 147/19
151/5 154/6 155/2 155/13 157/1 163/6
163/13 163/15 164/16 165/4 165/11
168/2 168/5 168/7 169/3 169/17 169/18
170/14 170/18 170/23 170/25 170/25
171/4 171/6 172/1 172/3 174/7 174/9
177/2 177/6 177/8 181/15 183/22
183/25 184/3 186/3 186/20 193/5
193/10 193/12 193/15 194/5 195/12
195/18 195/23 197/16 197/21 197/21
198/1 198/10 199/22 213/6 214/18
218/15 220/8 220/9 221/4 223/20 226/7
232/25 233/4 236/4 236/11 237/3
239/14 241/3 241/22 244/9 244/11
245/7 247/2 247/7 247/21 247/23 250/4
250/4 255/7 255/11 256/5 256/16
256/21 257/16 257/17 258/1 258/5
258/7 258/17 258/19 259/8 259/17
262/9 262/13 264/10 265/10 266/18
266/18 274/14 277/3 278/2 281/15
281/17 289/15 289/16 289/16 289/16
289/19 291/16 294/9 296/2 300/11
302/13 303/4 303/18 305/18 308/4
308/17 308/20 308/25 309/2 310/7
310/10 310/13 310/16 311/3 313/7
314/3 314/18 318/17 318/22 318/25
319/2 319/13 320/19 320/21 321/1
321/2 321/5 321/7 321/9 321/15 321/18
322/13 322/18 323/10 325/23 326/19
328/8 328/20 329/3 331/4 331/5 331/6
331/7 331/8 331/9 331/10 331/11
331/12 331/13 331/14 331/15 331/16
331/17 331/18 331/19 331/20 332/4
332/5 332/6 332/7 332/8 332/9 332/10
332/11 332/12 332/13 332/14 332/15
332/16 332/17 332/18 332/19 332/20
332/21 332/22 332/23
Noel [1] 43/25
nomenclature [1] 12/17
nonconfidential [7] 78/19 79/4 79/5
79/8 79/12 98/8 141/16
nonconsensual [4] 70/13 84/4 84/8
91/13

none [2] 255/10 327/19
nonetheless [1] 8/4
nonparticipating [1] 226/19
nonsense [1] 35/23
nonsexual [1] 76/25
nonspeaking [2] 189/16 224/4
noon [1] 14/7
NORTHERN [3] 1/1 21/18 21/25
Nos [3] 132/10 135/21 278/4
not [410]
note [5] 116/11 143/3 196/7 199/10
217/4
notebook [1] 196/11
notebooks [2] 196/12 223/1
noted [3] 120/25 160/8 164/6
notes [14] 196/5 196/8 196/10 196/16
220/9 223/2 231/13 246/5 246/22
246/24 247/17 247/20 247/22 299/15
nothing [10] 7/24 66/7 68/10 78/7 225/3
242/17 242/24 243/1 258/8 263/13
notice [30] 20/13 20/15 29/17 62/23
167/8 195/8 195/16 195/21 195/24
196/1 198/23 205/9 205/15 206/18
207/1 207/2 207/5 207/17 207/22 213/7
216/24 221/20 222/16 275/18 275/24
276/1 276/4 276/8 284/21 284/24
noticed [2] 4/2 63/6
notification [9] 66/7 207/23 211/22
217/3 220/5 240/7 244/25 285/16
298/12
notified [6] 106/11 141/24 199/11
251/22 275/20 304/6
notify [3] 95/9 242/15 294/21
notifying [1] 164/20
noting [3] 138/22 142/8 164/22
notion [1] 38/19
NOTRE [141] 1/5 1/23 2/4 2/15 2/17
2/18 3/21 4/19 6/6 6/20 6/24 7/4 7/12
8/15 9/3 10/12 11/8 17/1 27/8 27/13
27/17 27/22 29/2 29/10 29/13 30/4
30/14 30/19 31/3 33/1 33/2 33/18 33/23
34/4 34/6 34/8 36/16 36/18 36/23 37/2
37/14 37/24 38/11 38/23 39/3 39/11
42/2 42/8 44/25 45/13 45/18 52/11
55/18 57/23 57/25 58/2 58/15 61/19
62/3 62/7 67/11 67/15 67/22 70/1 72/1
73/12 73/17 78/15 78/15 82/10 91/23
95/4 95/22 98/15 101/13 104/5 104/8
131/19 136/10 136/11 136/14 136/18
136/22 137/12 137/16 138/20 139/1
140/5 140/20 143/9 144/13 144/17
145/14 146/5 147/11 149/11 150/4
158/25 161/14 180/7 183/24 184/18
184/24 185/6 185/25 192/18 193/3
195/25 199/21 201/1 202/25 204/7
204/14 205/1 205/13 207/7 255/5 262/5
269/16 270/4 273/7 273/16 275/16
276/11 276/13 280/5 281/21 282/15
282/24 283/25 287/5 291/25 306/7
309/3 310/2 310/6 312/3 312/10 312/13
315/15 315/15
Notre Dame [6] 34/4 78/15 273/7 280/5
281/21 315/15
Notre Dame's [1] 204/7
November [23] 86/5 86/10 86/11 87/12
105/15 106/3 135/10 142/4 151/2
165/16 168/13 172/7 194/6 195/8
197/20 197/25 198/24 206/18 207/5
207/7 208/11 275/18 276/1
November 2016 [1] 206/18

N
 November 28th [1] 142/4
 November 29 [7] 65/16 68/13 96/8
 198/24 207/7 275/18 276/1
 November 29th [5] 172/7 194/6 197/20
 197/25 208/11
 November 30 [1] 135/10
 November 30th [1] 106/3
 Novemberish [1] 311/6
 novo [2] 250/6 250/21
 now [72] 5/20 10/19 12/2 13/15 15/9
 16/13 16/13 16/18 16/23 18/9 18/14
 25/1 25/6 27/21 31/24 37/4 37/7 37/10
 38/5 63/23 68/3 73/10 84/17 95/21 99/8
 100/16 112/13 113/25 117/4 132/9
 132/19 150/7 155/16 162/25 169/4
 177/11 179/25 183/1 196/4 201/8 203/7
 204/16 206/9 206/10 206/19 208/10
 208/19 208/24 209/3 209/12 222/19
 224/16 224/18 230/12 232/23 237/13
 246/13 247/19 249/3 253/22 259/15
 269/1 270/5 271/8 271/20 284/21
 291/11 294/4 322/21 322/23 324/21
 325/9
 nowhere [1] 102/21
 number [30] 2/3 52/22 54/21 59/22
 73/12 84/14 93/11 104/12 105/23
 107/13 126/10 151/16 151/16 158/15
 159/9 159/25 160/19 196/23 210/5
 210/6 233/24 235/13 235/14 246/9
 252/7 253/24 276/16 276/24 284/12
 325/19
 numbered [2] 152/2 322/11
 numbers [3] 25/3 84/16 195/2
 nuts [1] 224/9

O
 O'Brien [1] 1/11
 o'clock [1] 299/13
 oath [7] 44/14 44/15 61/5 61/6 69/15
 69/16 200/15
 object [2] 151/14 303/7
 objection [31] 59/25 132/6 133/23
 134/8 134/9 135/17 135/18 146/19
 147/16 155/8 155/11 163/12 171/3
 171/25 174/6 177/5 227/19 277/24
 281/14 284/2 289/15 289/16 320/18
 321/1 321/7 322/7 322/14 322/18
 325/17 327/18 328/7
 objective [1] 31/17
 obligated [1] 226/6
 obligation [1] 205/1
 observation [1] 93/3
 observations [1] 227/9
 observe [3] 62/14 71/3 226/18
 observed [2] 199/18 318/1
 observer [1] 226/19
 obtain [4] 113/17 114/21 143/12 291/17
 obtained [3] 62/11 63/12 126/21
 obtaining [1] 222/9
 Obvious [1] 225/25
 obviously [10] 4/12 12/14 53/8 79/7
 84/3 131/12 140/22 181/17 277/5 323/2
 occasion [6] 45/21 130/25 131/2
 183/11 183/14 212/22
 occasions [1] 71/6
 occur [6] 46/6 114/15 142/8 161/21
 229/8 311/4
 occurred [10] 25/22 27/19 43/10 46/7
 47/18 62/7 62/17 173/4 287/15 297/4

occurrence [1] 140/25
 occurs [1] 144/20
 OCS [18] 139/4 185/13 185/16 276/10
 277/4 307/23 308/5 312/4
 OCS [30] 29/23 68/6 79/9 79/10 86/15
 87/2 88/17 122/23 123/1 142/23 143/16
 143/21 143/24 146/10 148/8 148/11
 148/23 149/17 176/23 176/25 179/21
 180/19 181/21 184/2 198/17 202/9
 202/10 242/4 275/20 290/5
 October [27] 76/10 77/7 86/3 94/18
 94/22 96/21 96/23 97/10 98/25 99/2
 123/14 141/23 150/10 152/12 153/3
 153/23 169/25 194/11 194/12 194/13
 213/6 213/7 227/13 316/8 316/10
 316/14 316/20
 October 13 [1] 97/10
 October 13th [3] 194/11 213/7 316/8
 October 14 [3] 152/12 153/3 153/23
 October 14th [6] 94/22 194/12 194/13
 316/10 316/14 316/20
 October 2016 [1] 150/10
 October 27th [2] 141/23 213/6
 odd [1] 190/13
 off [52] 7/21 16/9 38/5 48/18 50/2 50/3
 51/2 51/3 59/18 83/18 84/17 90/5 98/4
 112/14 115/24 120/1 127/22 139/12
 140/25 141/10 153/12 161/12 172/10
 173/7 182/12 197/6 197/11 201/25
 204/19 209/25 216/14 217/11 217/12
 227/1 235/17 239/17 241/19 246/3
 249/20 260/13 279/20 280/18 282/14
 290/12 301/16 303/6 306/16 306/18
 307/22 313/17 313/21 314/8
 offensive [1] 34/7
 offer [14] 61/3 68/20 110/17 132/4
 133/9 163/10 206/3 206/4 214/8 274/23
 298/4 321/19 324/11 325/21
 offered [15] 28/12 69/3 93/10 97/1
 194/11 194/15 195/4 213/23 239/11
 298/19 298/23 303/13 309/15 324/17
 325/10
 offering [2] 134/15 322/21
 office [87] 4/20 29/23 42/3 64/24 70/23
 71/7 82/22 86/15 86/17 86/20 86/22
 88/19 89/1 109/17 109/20 114/7 114/12
 115/8 115/15 121/22 122/10 122/12
 122/16 122/17 123/8 126/14 136/15
 137/13 142/23 143/1 144/22 149/14
 157/4 157/5 158/10 160/8 176/20
 180/11 180/25 181/1 185/18 190/11
 198/19 199/9 201/3 201/5 201/22 202/6
 202/8 202/10 202/24 206/11 209/25
 215/4 216/25 217/7 219/2 222/7 226/20
 227/2 242/19 243/3 243/5 244/7 245/4
 246/24 251/7 251/14 251/18 260/9
 264/20 269/7 276/9 276/14 277/11
 284/21 288/5 288/12 288/15 291/19
 294/3 304/6 307/24 314/10 314/12
 314/20 314/23
 office's [1] 279/12
 officer [4] 63/2 63/4 63/11 63/14
 officers [2] 89/9 219/4
 offices [5] 149/10 201/11 208/22
 218/20 279/18
 official [7] 261/7 261/9 266/3 266/5
 277/6 314/2 314/3
 officially [2] 43/12 261/4
 often [2] 39/10 90/15
 oh [13] 23/3 24/16 53/15 81/9 105/6

118/12 129/5 130/22 130/22 135/3
 240/24 267/17 328/2
 okay [295] 3/1 3/15 7/9 25/11/15 12/4
 13/2 18/17 19/15 23/3 24/3 25/11 25/12
 25/14 33/16 36/21 39/21 43/19 43/24
 45/5 45/17 47/14 48/20 48/24 49/4
 49/17 50/13 50/14 50/21 51/4 53/5 53/8
 53/12 54/14 54/25 57/10 58/20 59/11
 61/25 64/4 64/8 64/22 67/1 67/6 67/15
 67/18 67/21 68/6 68/14 70/18 70/23
 71/3 71/10 71/20 71/23 72/1 72/15 73/4
 74/2 74/11 75/17 76/7 76/18 77/4 77/13
 78/6 78/13 79/17 80/10 80/12 80/15
 82/8 82/16 82/24 83/12 84/6 84/11 86/9
 86/12 86/20 87/1 87/12 87/20 88/7
 88/21 88/21 88/24 89/3 89/18 91/19
 92/13 94/21 94/25 95/17 95/21 96/18
 97/12 97/24 98/18 98/25 100/8 100/16
 100/23 101/4 101/11 101/17 101/22
 102/24 103/2 103/9 103/23 104/19
 105/21 105/24 106/22 107/5 107/8
 107/22 108/8 108/16 108/22 110/2
 110/14 110/18 110/21 110/24 111/2
 111/5 112/2 113/1 113/4 113/8 113/15
 113/19 114/11 115/20 116/1 117/12
 117/12 117/19 119/7 119/16 120/4
 120/21 121/1 121/7 121/15 121/20
 122/15 122/20 122/25 123/9 123/12
 124/17 125/12 126/6 127/2 127/5
 127/14 127/19 128/23 129/9 129/12
 129/25 131/20 131/23 133/11 133/22
 134/7 135/16 140/18 142/11 142/22
 144/10 146/9 150/24 154/12 157/4
 158/13 159/18 168/17 168/20 168/24
 170/8 170/11 171/11 172/8 173/9 175/1
 175/14 175/25 177/16 177/21 177/24
 178/17 180/22 181/6 181/10 181/23
 182/22 183/11 184/5 185/11 187/9
 188/1 188/25 189/4 189/20 190/4
 191/21 193/6 194/3 195/11 195/24
 196/10 196/13 196/19 197/19 199/24
 207/1 207/5 211/11 213/3 216/20 221/5
 222/19 223/13 224/11 234/9 236/19
 241/8 242/11 243/13 245/2 248/3 248/9
 248/17 250/11 250/18 252/21 253/4
 255/8 255/16 264/22 267/18 274/8
 275/7 275/11 275/14 276/5 276/24
 277/13 278/9 278/20 280/3 285/18
 285/19 286/8 287/9 287/18 289/6
 289/11 289/14 290/5 290/8 291/25
 293/24 294/6 299/19 299/20 300/9
 300/9 301/3 304/18 304/19 305/25
 306/10 311/7 311/16 312/10 315/25
 316/19 317/5 320/17 321/12 322/2
 322/19 323/25 325/7 325/8 326/7
 326/17 326/25 328/10 329/4
 old [2] 162/10 225/25
 olds [2] 90/15 90/15
 once [19] 6/4 19/10 73/24 98/12 125/2
 142/6 142/6 143/15 143/21 155/16
 170/3 175/14 176/25 180/22 210/21
 231/22 258/25 270/9 294/15
 one [205] 3/9 6/2 9/8 10/22 11/3 11/14
 15/8 20/1 20/7 20/12 20/17 20/25
 21/10 21/17 23/14 23/23 26/5 31/6 31/7
 31/10 31/14 31/16 34/16 35/11 35/22
 35/22 36/9 36/14 36/19 38/6 40/12 42/8
 46/16 50/3 50/15 51/2 51/5 51/15 51/15
 55/23 55/25 57/14 58/10 59/8 79/15
 80/15 80/16 81/11 84/22 90/18 91/6

O
one... [153] 98/13 103/18 104/22
104/24 105/4 105/14 105/15 109/6
106/3 111/1 116/11 116/21 117/11
117/23 118/10 118/18 123/13 129/23
131/3 131/7 133/17 133/18 133/18
133/20 133/24 134/2 134/22 140/8
140/11 142/25 144/16 146/1 148/7
148/9 148/22 149/23 151/16 153/23
156/17 168/9 169/20 170/15 170/21
170/23 173/17 179/13 179/17 181/15
182/8 182/19 182/20 182/21 185/6
185/6 185/7 187/21 188/12 188/13
188/13 189/9 193/24 194/25 195/14
197/12 197/13 202/11 203/2 203/15
205/14 206/3 211/3 211/5 211/6 216/3
216/4 216/9 217/7 217/10 219/17
220/14 220/20 226/12 230/17 233/19
235/11 236/13 240/17 244/19 245/3
246/9 246/10 251/15 252/1 252/12
252/24 253/1 253/3 259/12 260/5
263/20 265/20 265/23 265/25 266/19
267/1 267/6 267/7 267/12 267/12
267/12 270/6 274/21 274/21 275/9
277/5 280/17 281/2 283/21 289/22
297/8 297/10 300/7 300/14 301/18
302/2 304/5 304/14 306/10 308/5 308/9
308/13 308/25 309/8 309/9 309/19
309/19 309/19 310/17 311/1 311/8
311/9 311/9 312/24 313/11 313/17
316/5 317/22 318/10 319/8 319/23
323/17 323/22 325/6
one-night [1] 20/17
ones [8] 4/22 32/9 203/21 319/16
319/16 321/23 321/25 323/20
ongoing [11] 36/20 96/4 120/6 134/5
178/15 220/10 245/23 246/7 246/14
246/14 246/15
online [7] 145/2 167/20 173/18 181/14
203/16 287/8 288/6
only [17] 9/11 9/14 12/2 13/7 27/22
28/14 40/12 103/7 189/21 206/7 240/4
280/6 282/2 319/8 322/12 323/1 323/1
open [15] 2/1 6/11 35/24 42/3 42/21
44/2 69/6 117/17 117/19 133/1 133/16
142/3 200/5 274/2 276/14
opened [1] 96/11
opening [2] 14/3 14/8
operate [5] 2/7 72/15 72/16 111/25
119/4
operating [5] 10/14 11/25 111/24
153/15 327/14
opinion [3] 60/1 190/19 323/8
opinions [1] 220/13
opponent's [1] 33/14
opportunities [3] 235/6 295/23 303/13
opportunity [55] 24/18 27/18 30/7 30/8
30/9 30/10 30/10 30/11 33/8 39/7 66/15
74/21 112/23 113/3 115/1 115/4 115/6
138/12 139/19 142/14 142/22 143/3
143/5 144/8 152/22 157/15 158/15
159/10 159/15 159/21 160/21 162/12
188/6 213/24 236/20 238/19 239/25
240/1 252/22 253/13 280/3 289/7
289/24 292/10 292/12 292/23 298/20
305/1 307/4 309/15 322/13 322/15
324/16 326/12 327/25
opposed [4] 60/4 186/4 290/21 296/16
opposing [4] 7/20 7/25 28/11 274/24
opted [1] 298/24

option [11] 74/5 75/5 81/6 87/15 253/13
269/15 269/16 274/23 289/23 293/9
304/12
options [4] 81/3 114/22 164/8 306/10
oral [1] 54/3
order [59] 3/5 3/7 3/9 4/3 4/20 8/16
8/20 12/12 17/14 17/17 20/5 24/16
27/25 43/10 47/9 47/25 48/5 48/15
62/11 62/15 63/3 67/17 67/23 102/22
102/25 103/7 103/10 103/20 104/4
104/6 104/11 104/13 112/7 123/10
140/3 168/3 168/6 168/7 169/17 169/18
170/24 181/15 221/16 222/3 222/11
222/16 257/16 257/17 258/1 258/5
258/19 259/17 264/11 267/13 280/15
308/20 309/1 314/19 326/4
orders [2] 37/23 142/6
ordinary [1] 12/20
organization [3] 230/1 230/5 277/18
organizational [2] 70/18 72/9
organizations [3] 89/15 201/21 202/3
orientation [1] 144/16
oriented [3] 33/4 144/14 327/24
original [6] 35/7 215/22 240/6 243/20
263/8 294/24
originally [3] 36/12 53/20 259/16
OSC [1] 202/9
Oscars [1] 307/22
other [157] 2/8 6/2 6/25 7/6 7/22 8/14
11/3 11/14 12/24 13/8 16/23 21/6 23/6
23/13 26/14 28/1 28/24 29/15 30/3
30/12 31/1 31/4 31/22 32/2 32/6 34/16
35/15 36/5 37/15 39/5 39/18 41/23
41/24 46/22 48/13 49/23 50/15 52/13
53/5 53/10 53/18 53/25 54/9 54/14
54/14 55/4 55/8 55/12 55/17 56/23
56/24 57/12 57/16 58/4 58/11 59/8
59/20 60/4 70/14 71/1 72/16 73/18 77/1
77/21 77/25 78/3 78/4 78/5 79/8 81/7
84/17 85/7 85/12 90/7 92/19 99/2
100/11 117/9 117/15 131/7 133/15
138/10 142/12 144/22 149/7 153/18
157/6 157/23 157/25 172/11 174/20
176/3 181/11 182/9 188/2 197/21 206/4
212/17 217/7 218/22 219/3 219/12
231/2 231/11 231/16 234/4 234/17
235/12 236/1 236/3 236/14 236/15
238/10 238/11 239/11 239/25 240/16
248/15 249/9 252/12 260/18 260/20
263/4 263/23 266/18 268/13 274/18
274/20 276/25 277/1 277/4 279/23
282/3 282/24 283/2 299/11 300/10
304/5 304/16 305/9 308/15 309/10
309/20 312/24 313/11 313/12 317/25
318/21 321/18 322/17 323/1 323/1
323/17 324/25 324/25 325/9 325/25
other's [1] 168/10
others [8] 16/8 28/25 113/12 193/14
278/8 281/8 305/7 317/25
otherwise [5] 37/25 231/14 231/15
268/21 307/18
our [147] 4/11 4/21 5/4 5/6 5/15 5/17
6/2 6/6 6/18 6/18 6/18 7/23 16/9 17/7
22/14 25/5 28/24 32/8 32/9 33/14 38/12
47/10 48/1 49/22 49/23 49/25 54/1
74/16 81/12 91/12 94/11 94/24 102/1
110/5 114/22 116/21 118/24 123/15
138/22 141/25 145/15 145/17 146/15
152/6 161/11 161/25 173/15 181/14
187/20 191/25 192/10 192/13 201/24

202/4 202/12 202/16 202/20 202/21
202/24 203/3 203/11 204/22 204/23
207/22 212/4 212/24 212/25 213/1
214/7 215/14 216/3 216/4 220/6 220/8
220/10 220/15 220/24 221/20 222/7
226/6 226/14 226/16 226/18 226/24
227/2 229/2 229/7 229/7 229/9 229/10
231/8 236/10 242/12 246/10 248/4
253/23 255/21 270/6 271/6 276/3 276/3
279/13 279/14 279/17 279/19 279/21
280/1 280/6 280/15 280/17 281/5
281/10 282/6 282/8 282/17 282/22
282/22 283/4 283/7 283/18 284/24
285/8 288/5 288/6 288/12 288/14
288/15 290/25 291/3 294/3 294/16
294/17 294/22 296/19 300/7 303/11
304/6 304/20 305/4 305/5 305/22
305/23 312/14 314/12 324/5 324/6
327/5
ourselves [3] 47/10 48/1 48/5
out [103] 4/3 5/10 5/21 10/11 20/8 26/1
28/16 30/14 33/3 36/17 37/8 39/13
47/20 50/6 50/9 50/10 50/16 56/12
56/17 62/25 63/1 63/15 65/10 66/14
68/3 78/8 89/21 98/23 104/6 109/14
113/25 114/22 116/9 116/10 119/23
120/15 120/18 122/4 126/25 127/6
127/20 127/25 133/16 140/14 152/23
154/19 155/18 155/19 156/24 160/2
167/16 172/22 173/22 175/18 187/9
194/24 195/11 200/2 213/6 214/14
214/20 216/24 217/15 218/1 220/21
223/4 225/18 225/23 226/16 227/12
228/10 232/11 233/17 239/24 241/7
244/7 244/17 245/4 245/16 245/19
246/1 251/23 256/18 262/5 264/4 267/7
276/2 281/6 287/22 288/6 289/4 293/14
293/17 294/16 298/20 298/23 299/13
320/14 326/3 328/15 328/18 328/20
329/3
out-of-her-mind [1] 50/16
outcome [24] 30/25 32/13 40/14 40/15
181/4 212/6 213/10 214/10 214/25
221/2 224/18 249/13 249/15 251/3
251/5 255/11 256/4 266/14 271/25
287/19 304/10 304/12 308/15 308/17
outcomes [2] 213/17 283/24
outdoor [1] 202/5
outlined [6] 42/13 240/6 249/7 262/17
275/21 285/8
outlines [1] 275/15
outset [1] 28/14
outside [6] 43/21 49/15 67/13 122/17
138/5 177/13
over [41] 10/17 16/16 16/21 17/21
24/13 42/25 44/12 47/20 48/24 63/2
66/12 68/12 86/21 89/22 92/1 95/1
105/4 126/1 126/16 132/16 138/3
148/12 153/18 156/12 156/17 171/12
206/20 212/18 231/1 249/5 250/14
255/17 255/18 268/9 275/19 296/21
297/4 297/18 311/12 318/11 318/12
overall [1] 203/18
override [1] 155/11
overruled [5] 60/2 151/19 227/22 284/3
325/18
oversee [1] 175/18
oversees [2] 5/22 149/17
overstates [1] 19/6
overview [4] 139/10 201/10 204/15

O
 overview... [1] 204/16
 own [7] 53/22 64/1 79/12 79/23 90/13
 135/3 213/8
 owning [1] 157/12

P
 P-R-A-S-A-D [1] 20/25
 p.m [11] 3/22 132/25 133/2 194/5 194/5
 200/4 200/6 274/1 274/3 291/3 329/8
 PA [1] 1/13
 pad [1] 300/19
 page [61] 13/3 28/12 42/12 72/1 92/9
 104/6 105/2 105/8 105/18 113/25
 117/21 126/20 145/6 145/8 145/19
 147/22 147/24 147/25 148/12 152/9
 156/12 156/12 156/20 156/20 157/7
 157/7 158/3 158/3 158/15 160/19
 187/10 187/10 187/17 187/18 188/5
 188/15 203/15 214/14 214/19 214/19
 242/4 248/2 249/7 255/4 280/17 280/18
 291/12 291/15 295/15 296/6 299/14
 299/14 299/14 299/25 301/24 302/9
 302/15 302/24 323/4 323/10 330/2
 page 10 [2] 187/17 187/18
 page 107 [1] 158/3
 page 12 [1] 42/12
 page 177 [1] 302/24
 page 2 [4] 28/12 126/20 145/19 291/12
 page 26 [1] 117/21
 page 27 [1] 158/3
 page 28 [3] 158/15 188/5 188/15
 page 29 [3] 160/19 295/15 296/6
 page 35 [1] 249/7
 page 6 [2] 147/22 147/24
 page 7 [1] 148/12
 page 748 [1] 104/6
 page 749 [1] 105/8
 pages [12] 3/24 4/8 95/21 115/14 123/3
 210/5 210/6 223/17 223/17 285/5
 290/12 323/4
 pages 26 [1] 285/5
 paid [1] 14/20
 panel [46] 40/21 180/22 189/22 190/1
 211/4 215/5 216/17 217/8 218/19
 219/13 219/16 219/22 220/2 220/17
 220/18 220/25 221/2 224/21 225/1
 227/18 234/14 236/25 238/9 241/2
 248/1 248/11 251/9 254/3 267/9 268/15
 287/10 292/9 292/18 292/24 294/19
 294/20 295/1 299/12 300/8 300/22
 304/11 305/25 308/12 310/21 311/12
 311/22
 panel's [2] 28/21 241/1
 panelists [1] 218/23
 panels [2] 138/14 184/21
 paper [2] 40/5 300/19
 papers [3] 14/12 20/22 249/19
 paragraph [22] 104/7 104/13 165/18
 166/1 166/21 167/22 168/2 207/12
 223/21 263/2 276/19 281/2 285/23
 286/4 287/11 287/23 291/15 292/10
 294/15 295/8 315/11 316/17
 paragraph 13 [1] 316/17
 paragraph 2 [2] 104/7 104/13
 paragraphs [4] 189/4 195/15 248/8
 324/22
 parameter [1] 189/13
 parameters [3] 189/6 189/11 325/15
 paraphrasing [1] 169/4

pardon [3] 100/21 104/17 293/16
 parent [6] 101/9 184/10 184/11 185/15
 185/15 283/3
 parents [2] 101/25 102/3
 park [1] 136/5
 parking [1] 257/20
 parse [1] 244/17
 part [65] 4/16 16/25 23/9 27/5 32/8
 33/20 37/7 43/14 55/6 61/2 68/23 81/24
 85/13 94/1 98/22 99/5 99/21 99/21
 104/10 117/2 118/7 122/11 127/8
 130/12 142/13 143/7 146/2 146/15
 152/6 153/11 157/19 168/22 170/5
 170/16 170/21 174/13 175/12 180/20
 188/15 189/24 190/16 191/4 194/25
 197/14 204/13 205/11 212/9 220/2
 220/25 230/20 239/6 240/14 245/11
 248/13 253/10 258/6 260/11 263/4
 288/10 310/20 314/8 314/9 314/23
 316/3 321/20
 partially [1] 231/10
 participants [1] 38/10
 participate [31] 64/23 66/9 66/12 66/16
 68/4 71/3 71/18 74/5 128/22 129/1
 138/14 149/13 160/22 168/9 184/20
 189/6 189/11 189/14 189/24 212/5
 212/13 212/17 219/6 219/7 224/3 224/4
 225/6 226/7 304/1 304/5 304/7
 participated [5] 89/14 138/5 138/6
 159/6 279/17
 participates [4] 149/14 149/19 149/19
 251/21
 participating [7] 93/23 111/9 115/18
 162/21 194/16 212/16 288/2
 participation [2] 168/11 225/2
 particular [32] 27/8 36/4 38/20 53/2
 63/8 75/19 77/4 151/15 155/1 156/7
 197/13 210/3 222/10 229/3 265/17
 271/5 282/14 289/1 296/25 297/19
 299/4 299/9 301/3 302/11 303/1 304/12
 304/13 308/3 308/18 311/8 311/16
 315/10
 particularly [16] 26/9 27/4 27/20 28/2
 28/8 107/6 131/6 202/25 228/19 231/1
 234/25 244/18 269/22 283/12 324/23
 325/4
 parties [21] 27/6 73/16 81/13 81/21
 91/6 106/11 117/9 140/4 161/13 176/18
 182/8 206/3 210/14 215/5 215/13
 222/19 228/16 229/18 230/20 234/25
 306/21
 partners [2] 138/5 202/19
 parts [3] 210/20 248/15 302/19
 party [9] 82/19 161/13 168/8 168/8
 182/9 184/12 206/4 215/8 225/11
 Pasalich [1] 72/8
 pass [4] 133/6 135/16 135/23 231/13
 passed [3] 73/2 260/17 260/20
 passes [1] 208/20
 past [4] 42/3 231/21 242/1 260/21
 path [1] 91/17
 PATRICIA [4] 1/10 2/20 5/7 200/24
 Patricia Hamill [1] 2/20
 pattern [2] 189/8 304/15
 pause [6] 112/24 113/17 221/19 243/15
 243/18 288/7
 paused [2] 113/20 221/16
 PC [1] 1/15
 peer [1] 282/18
 peg [1] 41/4

pending [13] 43/15 217/17 217/20
 265/2 265/3 265/9 270/16 270/20
 270/22 271/12 271/25 276/13 309/16
 penetration [1] 84/4
 pens [1] 300/20
 people [32] 29/20 70/23 78/1 81/4 87/2
 90/14 99/3 99/23 105/16 116/19 117/3
 118/25 122/17 122/19 122/20 122/22
 149/7 192/8 193/3 196/5 212/17 213/21
 219/13 220/20 244/23 252/1 280/12
 280/13 282/11 287/20 301/18 304/22
 per [1] 109/15
 percent [5] 89/23 90/1 197/9 220/16
 233/24
 percentage [4] 89/20 197/5 203/18
 234/1
 percentages [1] 273/12
 perception [1] 60/2
 perhaps [7] 32/14 32/24 33/19 36/1
 171/18 188/18 311/9
 period [16] 11/9 11/12 18/23 24/13
 42/14 43/16 136/9 151/3 213/23 214/8
 214/25 215/2 225/21 272/15 306/17
 311/4
 periodically [1] 196/12
 periods [1] 243/17
 permanent [7] 14/22 16/11 272/16
 272/18 272/19 287/17 304/25
 permanently [4] 213/20 305/14 305/15
 309/22
 permission [10] 47/2 48/6 50/22 147/8
 151/11 151/21 162/8 162/9 164/10
 175/2
 permits [2] 246/10 299/9
 permitted [3] 231/12 231/13 234/16
 perpetual [1] 85/3
 persistent [1] 32/19
 person [65] 48/14 48/14 58/20 59/20
 60/4 72/7 73/20 74/8 76/25 80/19 87/23
 88/5 92/19 93/22 98/11 124/1 124/6
 125/3 125/4 125/25 126/1 130/13
 139/14 148/4 148/18 148/19 149/17
 154/15 156/7 156/16 159/6 162/20
 197/22 199/18 207/18 208/24 216/5
 217/1 217/7 220/20 225/12 225/15
 233/9 233/19 244/19 244/20 251/10
 252/1 257/3 257/5 257/5 259/15 283/21
 283/22 283/23 284/13 297/17 298/4
 298/4 298/9 298/14 298/22 309/10
 310/21 311/22
 person's [1] 47/1
 personal [5] 130/8 142/14 153/13 257/9
 288/14
 personally [1] 323/3
 perspective [6] 81/14 157/10 157/22
 199/20 233/16 324/6
 perspectives [1] 284/11
 pertains [1] 158/20
 PETER [2] 1/14 2/23
 petition [2] 250/15 250/20
 phase [3] 208/5 294/4 307/10
 phases [3] 204/18 208/9 208/10
 Philadelphia [1] 1/13
 PHILIP [1] 1/7
 philosophical [1] 280/24
 philosophy [1] 281/1
 phone [26] 46/18 46/20 46/22 47/1 47/6
 48/14 48/19 51/24 54/19 55/9 55/22
 56/7 66/10 66/12 66/16 68/4 116/2
 126/1 222/3 222/9 225/14 225/16

<p>P phone... [4] 256/16 284/13 285/4 304/16 photocopies [1] 222/23 photograph [1] 296/16 phrase [3] 230/3 230/25 283/17 phrased [1] 235/9 physical [9] 22/18 22/18 22/19 54/3 77/18 148/3 148/4 193/11 268/3 physically [1] 216/15 pick [6] 24/24 48/21 132/22 132/22 200/3 210/18 picked [2] 249/20 320/14 picture [7] 296/16 296/20 311/8 311/11 311/14 311/21 312/23 pictured [1] 56/16 pictures [1] 210/25 piece [11] 24/23 41/23 43/6 77/14 80/3 84/13 85/16 103/4 130/11 176/11 188/19 pieces [15] 20/2 81/4 85/13 90/8 90/20 90/24 117/15 142/7 144/22 144/24 150/2 156/13 165/12 177/2 214/23 pinpoint [1] 199/3 place [21] 12/24 16/20 18/8 28/17 46/12 47/21 47/23 49/10 59/3 63/8 64/2 96/5 102/10 105/18 106/17 140/3 162/22 166/3 257/22 270/15 305/19 placed [3] 38/21 71/24 282/7 places [1] 269/25 placing [1] 91/22 plaintiff [7] 1/10 28/16 34/20 69/11 69/20 200/19 331/3 plaintiff's [28] 91/22 95/1 102/10 132/10 133/9 134/12 134/15 135/21 203/9 204/4 209/5 216/20 223/14 243/25 252/8 253/5 254/24 260/12 278/4 285/14 314/15 315/3 315/6 315/21 316/2 320/21 321/2 321/9 plaintiffs [1] 328/22 plan [2] 212/8 212/25 plane [3] 64/20 65/1 66/2 planned [1] 4/16 plans [2] 5/9 212/16 plausible [2] 42/24 194/8 play [5] 46/13 47/16 50/25 99/21 171/17 played [3] 51/7 171/13 327/23 pleadings [1] 253/23 please [29] 33/10 43/12 57/14 66/3 66/5 69/14 110/4 120/2 131/23 145/5 150/12 162/15 166/2 175/7 212/11 214/17 216/1 219/1 223/15 226/17 230/21 235/13 235/14 236/9 237/7 261/4 270/21 278/25 317/21 plenty [1] 235/6 podium [1] 23/7 point [72] 9/16 9/22 10/1 13/9 20/5 29/22 29/23 32/12 42/20 43/16 49/24 51/18 68/21 73/3 74/25 77/14 78/10 83/10 86/1 87/12 88/7 93/2 100/15 106/16 116/11 123/11 125/17 127/9 129/11 130/18 133/24 139/23 141/7 143/17 143/22 150/18 150/24 157/16 159/24 163/10 167/16 172/5 177/11 178/5 178/14 179/4 179/13 185/10 186/14 188/13 194/17 199/4 207/2 208/19 209/25 211/7 211/9 211/10 216/4 217/1 224/12 232/8 240/21 240/23 263/1 293/18 303/9 303/9</p>	<p>303/11 307/17 320/15 327/14 pointing [4] 23/23 97/19 129/6 203/25 points [10] 25/17 32/15 33/20 37/19 40/2 157/9 157/9 207/25 280/18 286/17 police [12] 63/2 63/11 73/18 79/7 89/9 93/14 98/16 101/13 128/17 202/25 203/1 262/5 policies [23] 28/17 75/4 79/16 84/22 91/12 144/21 147/2 149/2 164/6 166/22 167/17 175/18 176/2 187/21 188/2 195/13 195/25 207/13 240/5 240/6 280/13 280/19 287/5 policy [84] 31/10 31/14 37/11 37/12 38/4 38/4 67/16 67/25 87/15 88/4 88/16 99/24 107/11 117/22 139/16 146/2 146/6 146/9 146/13 148/7 148/9 148/22 161/1 161/5 167/3 167/5 167/9 167/10 167/17 175/17 176/5 180/23 187/20 187/25 190/22 197/1 198/16 198/22 199/1 199/2 199/4 199/10 199/13 207/17 208/17 209/15 209/20 211/11 211/21 216/8 216/12 216/18 217/11 219/5 220/13 228/2 229/4 232/2 234/15 234/20 235/3 235/22 236/16 236/25 238/12 242/23 242/24 243/7 266/11 266/12 266/24 266/24 267/16 267/21 267/24 268/16 268/22 269/2 281/22 286/15 286/17 299/8 308/11 308/14 poor [1] 38/25 pop [1] 65/8 portion [10] 4/21 5/23 23/12 40/11 84/3 203/14 203/14 247/25 287/5 298/18 portrayed [1] 184/21 pose [1] 308/9 posed [1] 302/7 poses [1] 301/4 position [8] 13/12 17/13 28/21 53/21 122/3 201/14 234/8 305/17 positions [1] 201/11 positive [1] 238/19 possession [10] 46/11 46/15 51/21 51/23 55/3 55/4 55/12 55/18 179/3 180/4 possibility [2] 75/20 316/11 possible [14] 4/17 16/19 65/2 208/13 239/2 239/18 257/2 269/2 271/8 282/9 287/16 293/3 294/2 317/17 possibly [16] 75/3 79/15 84/21 87/14 88/3 93/7 99/24 107/10 139/16 141/18 175/17 176/4 182/4 227/17 274/25 296/11 post [2] 136/23 138/1 post-graduate [2] 136/23 138/1 potential [6] 6/23 57/7 208/17 208/20 218/15 287/18 potentially [2] 99/25 180/13 powers [1] 270/9 practically [1] 18/18 practice [10] 2/8 76/21 94/23 96/3 193/3 197/21 224/1 230/6 236/14 305/10 practiced [1] 126/10 practices [5] 39/9 138/15 282/23 282/25 296/12 Prasad [3] 20/25 21/24 23/5 preamble [2] 234/11 237/9 preapprove [1] 88/21 preceded [2] 37/4 37/5 precedent [2] 25/21 27/12 preceding [1] 42/14</p>	<p>precipitated [1] 151/1 precisely [1] 199/3 predominantly [2] 70/15 70/17 prefer [2] 3/7 132/20 preliminary [12] 1/6 2/5 8/8 12/18 12/19 13/13 13/15 13/18 15/10 15/21 22/8 35/2 prepared [6] 6/10 12/13 13/9 209/8 231/3 294/2 preponderance [1] 287/13 prerogative [3] 29/13 33/2 33/15 present [27] 1/23 5/8 6/13 8/17 9/12 9/16 32/10 39/4 39/10 53/25 75/16 76/17 82/18 115/1 130/14 138/12 158/23 159/19 160/3 193/4 195/5 226/10 226/12 232/15 284/10 291/18 307/4 presentations [2] 138/19 139/2 presented [15] 32/9 79/14 86/7 87/14 115/7 115/9 115/12 122/8 128/1 140/25 159/10 236/21 255/19 287/12 292/11 presenting [1] 81/5 president [12] 42/21 76/4 76/5 76/6 94/12 128/10 149/16 149/18 251/17 279/19 279/20 280/1 pressed [1] 35/7 pressure [4] 106/13 106/15 108/4 108/7 pressures [1] 185/23 presumably [7] 18/9 18/13 255/6 265/1 266/12 271/22 277/14 presume [2] 54/12 232/6 presumption [1] 119/8 pretty [9] 60/6 102/3 104/22 108/2 119/23 125/1 155/19 185/9 324/9 prevail [9] 14/23 15/9 15/15 15/24 18/6 18/7 24/12 24/12 24/19 Prevailing [1] 16/12 prevent [1] 243/1 prevented [2] 242/18 258/9 preventing [1] 263/13 preview [2] 3/11 274/9 previously [28] 47/24 132/10 134/12 135/21 146/22 147/19 155/13 163/15 164/16 165/3 165/4 171/6 172/3 174/9 177/8 207/6 216/19 223/13 278/5 281/17 289/19 303/18 317/19 320/21 321/2 321/9 325/23 326/20 priest [1] 79/1 primarily [1] 137/5 primary [1] 67/12 print [2] 173/22 211/3 printout [1] 42/13 prior [13] 24/14 64/7 77/12 136/18 136/21 154/14 169/19 169/22 254/11 254/12 256/12 317/12 317/23 privacy [2] 224/23 288/6 private [2] 82/11 238/1 privilege [1] 189/1 probably [23] 22/24 32/14 82/10 83/20 89/23 98/5 114/21 125/9 137/3 149/8 160/18 187/2 197/18 202/18 219/19 246/24 248/2 262/20 262/23 274/6 275/5 300/14 327/16 problem [10] 10/10 12/16 25/6 71/13 257/12 273/1 273/2 322/9 324/8 324/12 procedural [9] 233/11 249/12 249/23 250/7 251/2 251/16 253/24 263/24 277/7 procedure [6] 39/1 39/2 140/19 153/15 188/16 306/7</p>
--	---	---

P
 procedures [51] 29/15 29/16 29/24 30/3
 30/6 30/14 30/19 30/20 31/13 30/23
 34/1 37/14 39/14 40/23 138/20 139/1
 147/2 149/3 149/22 158/4 183/24
 185/25 187/10 203/19 204/12 204/24
 219/9 224/12 227/24 227/25 227/25
 233/17 235/7 242/12 248/22 249/7
 259/1 259/1 279/7 279/20 279/25 281/5
 282/15 282/21 282/22 282/25 285/8
 289/23 294/1 294/16 308/7
 proceed [17] 8/8 8/14 8/20 8/21 40/13
 44/6 44/18 61/10 78/7 85/21 133/5
 141/7 150/20 150/25 151/20 155/17
 274/7
 proceeded [1] 188/1
 proceeding [14] 15/21 17/20 22/10
 45/18 46/5 46/10 62/7 90/17 134/3
 250/23 265/21 265/23 265/25 282/10
 proceedings [14] 1/24 2/1 6/9 44/2
 51/19 69/6 133/1 200/5 230/7 233/1
 236/15 274/2 283/14 329/13
 process [230] 5/22 16/22 17/25 19/8
 20/1 20/6 20/10 20/13 20/15 21/5 22/2
 27/10 27/17 28/15 29/20 29/22 31/12
 34/21 36/6 36/20 37/7 37/9 37/24 38/3
 38/11 38/24 38/24 40/18 41/21 70/10
 73/11 73/19 74/16 75/13 76/12 77/5
 77/15 79/19 80/3 80/17 80/25 81/6 81/8
 81/10 81/12 81/16 82/12 82/13 84/25
 87/12 88/16 89/2 91/4 91/16 93/23 94/1
 94/3 94/24 100/9 101/10 101/15 102/1
 103/7 107/12 111/13 112/20 112/22
 113/12 113/19 115/13 117/2 118/24
 119/1 121/22 122/7 122/9 122/14
 124/14 130/9 138/23 138/24 138/25
 139/12 141/13 141/25 143/3 143/15
 143/17 144/9 146/2 148/8 148/11
 148/24 149/4 149/7 149/12 149/15
 149/19 156/5 156/13 157/11 157/16
 157/19 158/11 159/7 160/3 160/4 160/7
 160/10 164/9 170/4 170/6 170/9 173/15
 174/2 175/20 176/16 176/19 176/21
 177/1 177/17 178/12 178/16 180/7
 180/14 180/19 181/1 181/3 181/23
 182/5 184/12 184/13 185/22 185/23
 188/4 188/19 191/10 191/21 192/9
 194/16 194/20 198/2 198/20 199/11
 199/21 202/22 203/3 204/8 204/13
 204/19 204/21 204/22 205/7 205/15
 206/6 206/21 207/22 208/19 211/18
 211/20 211/23 212/1 212/2 212/5
 212/10 213/8 214/7 215/3 216/1 221/20
 222/11 224/8 224/14 224/21 225/5
 226/4 226/6 226/9 226/24 229/10
 229/17 229/21 230/21 230/23 231/4
 233/5 233/8 233/9 233/11 237/12
 240/14 242/16 243/12 247/14 249/5
 257/19 258/6 258/21 258/23 259/15
 259/20 262/16 263/9 270/3 275/16
 276/3 279/7 279/17 281/6 281/6 281/11
 281/20 282/4 282/8 283/4 283/20 285/2
 287/18 294/5 296/13 297/25 298/5
 300/16 306/9 307/7 308/2 308/2 310/21
 312/5 322/22
 processes [12] 4/22 17/7 30/13 35/21
 39/12 139/5 161/11 162/21 186/11
 191/9 283/8 286/6
 processing [5] 70/15 71/12 130/20
 203/2 315/14

produced [10] 1/24 5/5 91/23 97/5
 104/4 255/5 315/12 315/13 315/22
 316/3
 production [6] 3/21 152/6 275/1 315/7
 322/10 326/14
 professional [1] 272/23
 program [2] 72/5 212/16
 progress [1] 224/24
 progressed [1] 47/22
 progressive [1] 282/5
 prohibited [2] 178/11 225/3
 project [1] 139/12
 promise [1] 205/2
 promises [1] 203/24
 promoted [2] 202/1 202/2
 prompt [1] 203/24
 prompted [1] 94/16
 promptly [1] 276/21
 prongs [1] 263/25
 proper [4] 35/13 37/17 137/10 191/24
 property [1] 130/8
 proposing [1] 154/1
 protect [9] 43/1 43/2 47/9 48/1 48/5
 48/10 48/10 212/25 232/16
 protected [3] 47/6 53/9 54/8
 protecting [1] 54/2
 protection [2] 102/22 112/7
 protective [9] 3/5 3/7 3/9 102/25 103/20
 104/4 123/10 241/16 242/6
 protocol [1] 253/10
 prove [4] 6/4 6/5 14/15 19/20
 provide [43] 26/4 46/9 51/18 51/20 56/9
 56/13 56/22 66/13 80/12 94/21 113/3
 124/24 139/25 142/23 151/12 154/23
 157/24 162/17 187/16 189/11 191/25
 199/8 205/13 206/22 211/16 214/23
 216/11 225/12 225/15 235/9 236/8
 236/10 244/24 253/14 262/14 263/23
 280/7 292/5 294/16 295/11 297/17
 298/8 300/19
 provided [25] 56/3 56/6 56/17 65/4
 95/24 124/25 126/20 127/3 183/2
 225/19 235/6 238/18 251/2 277/4
 284/21 287/9 290/5 290/17 292/3
 294/24 295/23 304/7 305/8 311/17
 319/17
 provider [1] 297/22
 provides [7] 126/3 181/11 189/6 214/24
 214/24 221/20 280/7
 providing [4] 109/17 160/5 165/9
 298/13
 province [1] 205/3
 provision [6] 147/22 220/24 226/18
 251/16 262/21 270/12
 provisions [3] 207/17 209/15 209/21
 PRUITT [6] 1/19 2/16 4/25 5/7 5/13
 5/20
 pseudo [1] 233/1
 pseudonyms [1] 94/11
 psychological [2] 100/8 286/21
 psychologist [2] 100/8 190/14
 psychologists [1] 100/11
 psychology [3] 99/9 99/11 279/4
 public [5] 42/16 82/12 137/22 238/1
 280/15
 publicly [1] 288/5
 publish [1] 279/13
 publishing [1] 202/16
 pull [4] 4/11 108/11 262/23 299/13
 pulled [2] 113/25 262/5

punched [1] 195/17
 punitive [4] 212/7 233/9 233/11 269/23
 Purpose [1] 283/6
 purpose [18] 77/16 78/10 95/5 145/8
 149/21 153/25 154/19 164/1 168/5
 184/8 226/21 280/4 280/5 293/24 294/1
 294/10 316/21 317/16
 purposes [11] 4/12 16/2 19/5 23/7 44/9
 203/7 223/9 249/6 252/15 252/24 253/4
 pursue [8] 75/6 80/21 81/7 87/10
 139/20 139/21 164/23 176/15
 pursued [2] 37/2 194/2
 purview [1] 307/11
 push [1] 12/8
 put [41] 4/21 5/15 5/18 5/21 6/17 6/18
 7/19 15/24 17/21 34/17 59/22 65/5
 104/3 123/2 140/2 140/10 162/2 163/18
 204/7 220/4 220/21 221/12 221/17
 232/8 244/13 249/10 249/19 252/25
 256/1 260/19 262/24 265/5 271/3 275/1
 275/2 276/7 288/14 294/2 306/16
 306/18 316/16
 puts [2] 13/11 39/16
 putting [4] 245/10 282/11 321/5 322/14

Q
 qualify [3] 218/3 240/4 308/4
 quarter [2] 83/20 303/10
 question [73] 38/4 46/3 50/15 56/14
 67/16 67/25 82/2 89/4 97/12 104/20
 105/5 120/18 131/21 132/18 146/13
 148/11 148/25 161/5 177/16 179/15
 186/22 188/23 189/16 199/16 205/12
 208/1 216/9 221/3 226/20 227/8 231/23
 232/2 233/15 234/15 234/20 235/9
 235/9 235/16 235/22 236/11 236/14
 236/16 236/16 237/1 238/23 247/4
 267/3 268/14 270/10 275/4 281/22
 299/16 299/17 300/17 300/18 300/21
 300/23 300/24 300/24 300/25 301/1
 301/4 301/14 301/17 301/19 302/2
 302/6 302/22 316/6 316/22 317/14
 319/5 319/23
 questioned [2] 6/12 195/13
 questioning [2] 59/11 306/2
 questions [103] 6/14 8/13 9/13 23/19
 31/11 31/14 37/11 37/12 52/3 52/12
 66/21 74/4 74/7 82/17 83/2 86/13 88/16
 123/20 125/14 132/13 133/7 133/8
 146/2 146/7 146/9 148/7 148/22 161/1
 162/21 167/3 167/5 167/9 167/11
 167/18 180/23 186/13 187/23 190/20
 197/1 198/10 198/11 198/16 198/22
 199/1 199/2 199/4 199/10 199/13
 211/21 216/8 216/13 216/15 216/16
 216/18 217/11 219/23 224/5 226/22
 230/14 233/5 234/13 234/14 234/19
 235/3 235/8 235/10 235/11 235/12
 235/21 236/1 236/2 236/7 236/15
 236/23 238/12 254/5 267/16 270/8
 272/9 273/19 274/11 275/5 275/6
 275/14 278/20 286/15 286/18 292/13
 292/18 292/24 299/1 299/8 299/22
 300/10 300/25 301/10 301/20 302/11
 302/17 303/1 303/13 312/23 318/7
 quick [2] 63/1 247/11
 quickly [7] 119/21 119/23 119/24
 155/19 260/21 322/16 328/18
 quite [7] 3/6 28/13 89/24 191/16 210/4
 253/23 327/23

Q
 quo [4] 16/18 25/20 27/7 27/23
 quote [4] 28/12 26/21 266/6 283/17
 quote-unquote [3] 207/21 266/5 283/17
 quoting [1] 236/13

R
 race [1] 90/8
 radius [1] 105/9
 raise [6] 12/1 32/6 44/13 61/5 69/14
 200/13
 raised [7] 67/16 68/1 250/2 253/23
 265/19 306/2 317/14
 Rakoczy [1] 76/5
 rash [1] 246/4
 rather [13] 31/1 32/2 32/4 96/6 98/11
 98/14 235/8 274/20 276/1 291/6 321/21
 322/3 323/2
 rationale [4] 27/5 214/24 244/22 247/24
 rationally [1] 60/2
 re [2] 142/3 246/14
 re-open [1] 142/3
 re-visit [1] 246/14
 reach [12] 32/11 126/25 127/6 127/20
 154/19 155/18 175/18 226/16 227/12
 242/15 245/24 246/13
 reached [11] 8/7 36/17 66/14 68/3
 116/9 116/10 155/19 172/22 283/20
 304/10 304/13
 reaching [3] 152/23 213/6 283/22
 reaction [2] 131/9 328/1
 read [27] 14/12 21/6 28/11 31/22 34/18
 35/12 65/17 66/5 95/7 103/13 109/5
 120/8 129/23 135/3 152/22 158/13
 160/10 187/15 207/3 241/20 255/13
 260/16 264/11 264/11 274/20 293/19
 326/3
 readily [1] 10/17
 reading [9] 31/17 65/23 98/7 104/10
 104/15 112/6 120/11 127/8 255/2
 readmission [3] 214/7 305/2 309/16
 ready [10] 8/13 11/20 11/20 44/6 133/5
 171/8 171/10 200/8 290/24 300/18
 real [4] 63/1 232/4 273/2 324/8
 Realistically [1] 125/8
 realization [1] 212/19
 realize [5] 181/6 224/18 240/21 312/2
 322/15
 really [38] 2/7 12/2 15/19 16/1 16/15
 18/10 21/7 22/22 23/18 37/17 37/19
 40/9 54/24 62/22 63/6 85/2 118/19
 125/3 130/17 158/24 181/9 185/20
 207/17 209/22 210/21 211/12 211/20
 224/18 235/16 250/1 271/10 275/25
 275/25 280/10 281/1 317/7 318/23
 324/9
 reapply [5] 16/24 17/14 17/18 18/12
 304/12
 reapplying [1] 17/24
 reason [19] 12/1 28/1 29/3 53/22 63/7
 98/22 116/3 152/22 154/5 164/5 194/6
 198/17 199/3 237/3 256/1 273/5 290/20
 305/15 328/11
 reasonable [11] 13/19 16/3 19/2 19/20
 20/3 28/16 40/8 148/19 257/2 257/5
 323/15
 reasonably [1] 287/23
 reasons [5] 8/20 24/11 26/25 216/9
 242/5
 recall [61] 45/24 46/1 59/21 60/13

64/10 92/10 95/23 95/25 95/25 96/2
 96/7 96/10 99/8 103/15 104/23 111/3
 115/11 116/11 113/24 116/6 116/10
 127/22 129/20 132/18 146/1 155/23
 156/3 174/16 178/20 179/6 179/21
 183/3 183/5 222/7 222/8 230/3 230/17
 237/21 237/23 237/25 238/2 238/3
 238/13 239/17 239/18 241/19 241/24
 257/17 258/2 258/7 266/7 268/20
 290/11 292/22 293/5 298/22 311/18
 316/14 317/14 317/22 320/6
 recalling [1] 37/5
 receive [21] 73/14 87/9 139/13 142/17
 144/5 191/4 191/13 191/23 206/22
 206/24 210/23 211/1 211/2 216/2
 235/11 253/12 258/12 260/10 284/24
 288/13 293/19
 received [30] 32/1 76/16 95/21 100/18
 101/2 102/7 103/11 113/10 116/25
 132/11 134/13 135/22 177/22 179/24
 182/2 192/11 192/12 194/5 196/1
 215/15 259/2 259/24 260/8 263/20
 285/1 296/13 299/2 325/14 331/1 332/1
 receiver [1] 85/5
 receives [1] 212/6
 receiving [2] 103/12 207/18
 recent [1] 211/1
 recently [2] 138/8 217/22
 recess [6] 44/1 69/5 132/25 200/4
 274/1 329/8
 recognize [20] 29/10 102/12 105/19
 106/18 107/18 108/10 110/24 121/17
 123/4 131/18 207/9 211/25 252/23
 253/1 253/7 280/23 285/15 288/20
 305/16 319/13
 recognized [2] 19/18 21/2
 recollection [6] 104/19 105/11 146/15
 237/11 238/10 324/1
 recommendation [2] 312/5 312/7
 recontacted [1] 142/4
 record [72] 2/3 2/9 2/10 5/4 6/10 12/14
 14/23 15/14 16/11 25/7 34/8 35/2 46/19
 47/6 70/4 97/5 161/25 172/5 195/3
 197/13 201/1 203/8 203/10 204/7 209/5
 209/25 210/3 211/8 219/24 221/12
 221/17 221/23 222/5 222/17 223/2
 223/9 223/15 239/10 239/14 240/2
 241/10 241/13 243/8 252/15 252/24
 252/25 253/5 253/23 256/1 257/14
 264/7 272/13 272/17 276/8 277/22
 300/1 311/5 314/9 314/23 320/24
 321/21 322/14 322/21 323/2 323/5
 324/17 326/3 326/12 327/21 328/9
 328/12 329/13
 recorded [6] 46/17 47/10 48/5 254/13
 256/6 256/6
 recording [11] 23/7 50/6 53/22 59/9
 59/9 220/9 244/16 244/19 246/6 246/15
 255/25
 recordings [1] 255/25
 recordkeeping [1] 121/16
 records [7] 17/22 112/12 143/19 220/6
 222/4 222/9 254/4
 recovery [1] 40/19
 RECROSS [4] 198/14 320/1 330/11
 330/14
 RECROSS-EXAMINATION [4] 198/14
 320/1 330/11 330/14
 rector [1] 166/11
 rectors [1] 93/17

red [21] 147/1 147/4 147/22 148/2
 156/12 156/18 156/22 156/25 157/7
 159/25 173/24 187/7 188/11 193/1
 193/13 203/11 262/17 285/11 285/12
 286/6 296/3
 red book [1] 156/12
 redact [3] 116/15 116/20 116/22
 redacted [5] 1/6 289/17 303/21 325/21
 327/15
 redaction [1] 289/13
 reddish [1] 147/5
 redirect [8] 58/25 59/1 187/1 187/5
 312/19 330/5 330/10 330/14
 refer [10] 75/23 122/19 187/22 213/21
 220/11 225/8 227/2 235/7 267/15 276/3
 reference [8] 57/22 129/19 209/14
 210/21 214/18 238/8 238/9 283/9
 referenced [5] 6/1 40/12 210/24 254/21
 280/7
 references [1] 210/22
 referencing [5] 104/12 116/16 127/10
 210/9 210/13
 referral [2] 99/6 193/8
 referred [13] 29/22 73/17 76/8 97/12
 99/1 141/20 176/19 176/20 180/13
 251/17 263/9 264/20 265/14
 referring [10] 51/12 55/21 58/9 58/16
 58/20 59/12 59/19 59/23 60/3 227/25
 refine [1] 283/7
 reflect [2] 140/19 288/22
 reflected [2] 213/16 220/21
 refrain [1] 61/17
 refresh [2] 104/19 105/11
 refreshes [1] 299/23
 regard [8] 9/4 31/19 40/15 155/21
 161/4 170/22 279/11 314/8
 regarding [11] 116/15 134/16 134/18
 134/24 135/13 135/14 163/23 206/10
 276/9 314/16 321/5
 regardless [5] 34/9 80/22 186/11 228/6
 267/1
 regional [1] 138/10
 regionally [1] 138/16
 registrar [2] 137/17 272/11
 regular [1] 124/3
 regulations [5] 269/14 279/22 282/6
 282/8 283/13
 rehash [1] 278/24
 rehearing [1] 250/10
 reiterating [1] 236/23
 rejecting [1] 256/3
 relate [3] 131/22 184/9 234/20
 related [45] 66/23 70/10 70/11 74/1
 84/4 95/20 109/19 118/5 147/2 149/2
 163/24 166/22 167/17 173/15 175/9
 175/17 176/10 178/15 179/16 180/17
 181/15 181/16 181/18 181/24 203/19
 205/6 207/13 217/19 219/7 234/14
 234/20 235/2 236/25 256/15 266/6
 268/14 276/19 283/12 297/8 307/7
 307/10 307/15 311/22 311/25 320/4
 relates [2] 3/5 67/2
 relating [7] 3/2 3/8 133/14 133/15 135/9
 144/21 276/11
 relation [1] 193/15
 relations [1] 79/9
 relationship [35] 20/9 20/11 20/11
 20/14 32/18 32/18 70/19 90/14 139/4
 148/5 164/3 214/5 227/14 227/16 228/7
 228/8 228/10 228/14 228/15 228/16

<p>R relationship... [15] 228/19 235/1 235/24 236/2 236/7 236/10 238/17 239/20 269/22 296/24 296/25 297/16 311/20 317/6 317/11 relationships [1] 91/9 relatively [1] 213/23 relayed [1] 93/3 released [1] 60/16 relentless [1] 85/4 relevant [10] 23/11 23/17 122/5 143/12 145/23 227/17 243/9 256/19 261/22 323/5 relief [11] 12/19 13/14 14/17 15/5 17/11 22/21 25/24 27/6 27/21 28/5 40/6 remain [1] 134/11 remand [3] 251/7 251/13 264/8 remarks [1] 14/8 remedy [1] 186/17 remember [10] 105/15 129/14 169/13 179/23 238/17 247/16 251/25 254/13 262/22 306/6 reminders [1] 144/24 removed [2] 18/3 63/13 rendered [3] 180/23 306/1 306/4 renders [1] 233/19 repeat [8] 18/12 26/6 46/3 56/14 214/17 237/7 270/21 317/21 repeated [2] 148/17 255/17 repeatedly [2] 78/2 297/5 repercussions [1] 211/13 repetitive [1] 33/9 rephrase [2] 300/25 301/20 rephrasing [1] 300/25 report [64] 43/9 43/11 74/12 74/19 76/19 79/7 87/9 87/23 87/25 88/3 90/9 98/9 119/5 126/3 126/4 129/15 129/18 139/13 141/15 144/3 159/17 160/7 166/25 175/8 175/11 178/10 190/5 192/11 206/24 209/3 209/4 210/1 210/8 210/13 210/17 210/21 215/7 215/22 216/2 238/6 240/15 246/6 257/17 258/12 259/2 259/20 259/24 259/24 260/8 260/10 260/10 261/3 261/7 261/8 261/9 261/10 261/17 262/7 262/9 284/25 285/1 309/10 312/8 314/11 report's [1] 209/24 reported [15] 1/24 2/2 43/12 44/3 69/7 80/2 127/18 133/2 141/1 200/6 258/18 260/23 261/5 274/3 316/21 reporter [2] 273/23 329/17 reporting [9] 72/13 77/24 90/8 141/4 181/14 197/16 259/17 281/5 314/3 reports [18] 77/10 77/12 126/23 126/23 127/6 138/24 144/1 144/1 181/14 199/6 202/23 202/23 203/1 218/4 238/11 258/6 258/20 276/21 represent [7] 6/7 6/8 52/11 67/10 92/10 200/24 232/16 representation [2] 82/19 234/7 representative [5] 192/17 226/13 233/3 234/5 277/14 representatives [1] 4/19 represented [1] 232/24 reproduced [1] 4/5 reputation [3] 58/13 58/15 286/21 request [60] 17/2 68/6 68/7 74/23 74/24 75/12 75/14 75/20 78/11 79/20 95/11 110/5 110/7 110/8 111/19 111/21 113/10 113/13 113/22 119/14 119/16</p>	<p>119/18 119/20 120/3 121/4 135/14 139/20 141/21 154/6 164/21 175/20 180/21 181/4 192/13 192/23 198/2 193/17 221/18 221/24 222/5 222/7 239/13 242/3 242/11 242/13 243/21 249/11 250/23 252/4 253/6 253/11 253/24 254/22 254/25 263/21 288/13 302/22 306/3 306/4 315/16 requested [8] 78/7 111/17 183/8 222/1 239/14 288/24 323/6 329/10 requesting [4] 111/8 112/24 139/21 183/5 requests [9] 110/12 111/9 113/8 119/24 120/24 121/1 134/17 255/9 294/19 require [3] 18/11 220/15 232/23 required [5] 102/25 125/2 204/24 269/1 290/6 requirements [3] 18/14 24/15 271/24 requiring [1] 40/5 reschedule [2] 114/8 221/19 rescheduled [1] 114/11 rescheduling [1] 114/15 research [1] 268/21 researching [2] 244/16 270/6 reserve [5] 5/5 6/3 6/14 8/11 270/15 reserved [1] 5/17 reserves [1] 265/5 resided [1] 137/6 residence [3] 47/21 47/23 104/24 resident [3] 136/23 137/4 201/22 resident's [1] 202/24 Residential [1] 76/6 resolution [6] 203/25 205/3 205/14 270/17 270/20 270/25 resource [26] 80/3 98/8 98/25 112/17 112/18 123/14 124/5 124/15 124/16 124/19 134/18 138/24 141/17 156/15 158/22 161/8 161/9 161/10 161/17 161/22 162/18 162/20 163/1 164/3 165/8 165/19 resources [16] 96/12 96/14 96/17 98/2 98/24 118/25 124/2 139/25 156/14 161/11 162/23 163/24 166/3 166/18 195/4 280/7 respect [38] 39/2 43/4 57/12 73/1 77/6 94/6 113/23 114/17 114/19 115/20 119/20 140/20 146/10 179/17 182/19 183/11 183/14 185/18 188/2 189/8 199/16 203/4 208/13 215/23 221/10 222/19 223/25 229/17 230/12 232/20 233/15 234/3 234/7 250/25 255/25 257/4 282/3 311/19 respects [1] 280/9 respond [20] 41/19 102/8 109/18 111/2 115/4 125/3 128/23 129/9 162/22 236/20 238/19 239/15 240/16 240/19 242/8 252/3 252/19 253/11 254/8 276/21 responded [8] 5/7 66/6 119/21 119/24 123/8 129/10 163/5 182/10 respondent [57] 21/4 21/21 21/22 22/3 30/5 34/23 40/17 74/23 75/12 76/22 77/24 81/1 92/20 92/21 93/25 94/2 96/12 104/7 110/7 110/11 111/20 114/20 117/23 119/18 125/4 125/18 130/12 139/18 139/24 156/6 158/4 161/23 181/3 189/1 190/15 211/6 211/9 225/9 226/15 234/16 235/5 236/8 240/20 258/13 258/13 259/2 259/25 263/6 268/8 289/25 291/5 294/18 300/4</p>	<p>300/14 300/17 302/1 302/19 respondents [14] 99/24 110/16 125/24 059/14 161/12 173/23 183/12 199/24 295/18 295/20 301/11 309/4 310/3 314/13 responding [9] 31/24 65/20 70/11 120/24 121/1 137/1 277/8 277/9 314/16 responds [2] 302/4 302/13 response [32] 36/2 36/23 39/24 41/13 65/18 66/5 93/10 110/25 111/1 119/14 121/4 123/6 150/18 193/10 193/20 223/20 236/4 239/10 242/3 253/13 253/15 253/17 253/18 254/24 263/18 264/3 283/12 302/22 303/3 305/24 315/12 315/13 responses [1] 35/11 responsibility [19] 78/12 118/24 121/24 139/7 176/5 202/3 206/14 221/1 229/10 248/19 267/14 267/15 267/22 279/12 279/13 281/3 283/23 287/16 306/14 responsible [20] 22/13 28/21 86/17 170/23 202/16 211/15 214/21 240/9 246/2 246/2 247/15 251/15 255/20 266/24 267/5 267/20 268/24 304/22 310/4 318/18 responsive [1] 42/8 rest [5] 16/19 29/24 95/7 123/4 289/4 restorative [3] 269/22 270/2 270/5 Restraining [1] 20/5 restrict [2] 189/15 291/25 restriction [1] 291/16 result [4] 170/21 231/9 248/6 265/8 retaliated [2] 117/1 117/7 retaliation [5] 130/7 130/9 130/13 178/2 178/8 retaliatory [1] 90/12 retired [1] 89/9 returning [1] 202/20 reveal [1] 79/1 revealed [1] 176/1 revenge [2] 256/13 257/1 revengeful [1] 257/9 reverse [1] 35/5 review [104] 30/9 30/12 34/7 38/6 71/17 81/2 87/6 88/25 115/2 115/3 122/7 122/12 122/14 122/22 122/24 132/16 140/18 149/2 149/4 149/7 149/12 149/21 159/16 162/7 162/12 166/25 168/24 175/22 180/18 180/21 180/24 181/4 182/3 202/23 205/10 205/15 216/5 216/16 216/25 220/2 242/16 242/21 242/22 243/6 243/12 248/5 248/23 248/24 249/1 249/4 249/11 249/21 249/22 249/25 250/3 250/4 250/5 250/6 250/21 250/23 251/20 252/4 252/16 252/25 253/7 253/9 253/11 253/20 253/24 254/9 254/16 254/25 255/1 255/9 255/10 255/12 263/17 263/21 264/2 264/6 264/13 267/5 279/21 282/17 283/3 287/21 288/9 288/14 288/24 289/7 290/1 290/18 290/24 294/1 298/5 299/4 299/7 306/9 306/10 306/13 307/3 308/12 308/12 328/1 reviewed [18] 27/15 35/4 39/3 88/8 127/2 127/16 152/23 158/7 160/12 223/17 249/11 254/15 254/20 266/8 290/25 304/9 311/24 314/10 reviewing [8] 180/23 203/1 209/10 221/10 288/15 290/21 291/20 299/6</p>
--	--	---

R
 reviews [1] 213/17
 rewind [2] 245/1 245/14
 Rice [1] 282/20
 rich [2] 33/25 38/25
 right [271] 5/6 5/17 8/3 11/16 11/17
 11/24 12/6 12/10 13/4 13/6 13/10 13/17
 13/20 14/2 16/9 17/21 18/9 19/12 21/9
 22/20 24/10 34/18 39/15 41/5 44/5
 44/13 44/14 44/17 50/21 52/15 53/1
 54/12 55/2 56/1 56/13 57/3 57/5 57/17
 57/23 57/25 59/9 60/7 60/11 61/5 61/8
 61/9 67/7 67/17 68/1 68/4 68/11 69/14
 69/19 72/7 73/20 74/9 74/14 77/11
 77/21 78/6 84/17 85/17 86/12 89/3 91/2
 91/3 91/19 92/7 96/18 97/4 97/19 98/20
 99/8 100/16 101/13 102/14 106/3 107/6
 107/20 107/25 109/2 112/9 112/13
 113/22 113/25 114/3 114/4 115/10
 117/4 117/21 117/22 117/24 120/15
 121/3 121/5 123/17 125/10 126/9
 127/11 130/24 131/8 132/8 133/4 133/5
 134/4 135/7 135/25 136/5 140/16
 140/24 141/5 141/10 143/13 146/7
 146/21 147/12 148/12 149/1 150/12
 150/22 152/10 152/21 153/2 153/5
 153/6 155/4 156/24 157/6 159/6 159/9
 159/21 159/24 162/17 163/7 163/8
 163/14 163/18 163/25 164/24 165/13
 165/16 165/16 165/19 167/13 167/16
 167/20 168/3 168/15 169/4 169/24
 170/19 172/13 172/20 173/1 173/2
 173/11 174/24 177/7 177/14 179/6
 179/19 179/21 179/25 181/17 181/19
 181/21 182/12 183/20 184/16 185/13
 186/24 187/13 188/8 189/1 189/5 189/9
 189/12 189/15 194/13 199/14 200/13
 208/5 208/10 215/17 215/19 221/6
 222/21 222/24 223/4 223/7 223/21
 224/23 231/17 238/21 238/25 239/6
 239/22 240/21 242/24 243/4 245/24
 246/1 246/13 246/16 246/20 248/10
 249/15 250/3 252/11 252/19 253/11
 254/5 254/12 254/15 254/20 257/1
 257/7 257/12 261/11 261/12 263/15
 265/5 266/13 267/17 267/25 269/2
 270/11 270/15 270/17 270/25 271/8
 271/20 272/24 275/23 278/3 279/8
 284/1 284/16 285/22 285/25 286/2
 286/11 286/19 286/19 287/7 288/19
 290/1 293/16 294/8 294/10 294/13
 295/5 296/4 296/14 296/20 300/11
 300/14 301/7 302/24 303/17 304/2
 308/20 311/9 312/25 314/4 318/7 318/8
 321/16 324/20 328/4 329/6
 rights [10] 42/3 81/11 109/17 109/20
 233/12 269/7 276/9 276/14 282/12
 292/8
 rise [5] 33/16 44/4 69/8 133/3 200/7
 risk [1] 193/4
 road [2] 4/13 181/6
 robust [10] 27/17 30/3 30/12 37/25 38/3
 38/23 39/12 41/17 219/20 233/17
 robustly [1] 39/2
 Roe [141] 19/25 27/11 30/5 31/4 33/10
 34/21 35/7 35/10 36/15 37/6 37/13
 38/10 41/20 45/15 45/19 45/22 46/24
 52/13 53/5 53/9 53/19 55/8 57/11 57/23
 57/25 58/6 58/13 62/7 62/10 75/19 78/7
 85/2 86/6 88/6 92/11 94/6 95/9 95/19

98/3 101/6 106/24 110/5 110/9 112/18
 116/7 116/25 117/6 117/19 120/3 123/9
 129/21 129/22 129/22 130/1 130/5
 130/6 133/19 133/21 133/25 134/16
 134/18 134/22 134/23 135/10 140/21
 141/4 141/17 142/14 142/19 143/4
 146/3 150/8 150/13 153/1 153/13
 155/16 163/23 164/2 164/20 168/12
 168/17 169/2 170/15 174/21 175/10
 177/12 177/18 177/19 178/6 178/20
 178/23 181/12 183/2 183/8 193/18
 194/10 197/19 221/24 227/11 229/23
 235/2 236/19 237/13 237/17 239/11
 240/24 242/7 243/13 254/11 256/12
 257/15 257/25 258/5 258/19 259/4
 259/20 259/25 260/17 261/15 262/3
 271/19 275/8 284/17 291/9 300/11
 307/15 308/19 311/20 315/6 316/4
 316/9 316/20 316/21 316/24 316/24
 317/12 317/24 320/4 320/23 323/18
 326/10
 Roe's [25] 4/7 31/24 41/8 76/8 77/6
 100/17 105/21 105/25 106/10 106/14
 106/23 107/21 108/15 112/18 128/4
 183/18 227/4 258/4 261/19 266/3 275/1
 277/18 314/2 324/1 326/13
 Roes [1] 27/12
 role [11] 28/14 28/18 73/1 109/7 124/1
 136/14 189/14 189/16 218/21 224/4
 305/11
 roles [2] 164/7 309/14
 romantic [1] 148/5
 room [4] 11/22 50/1 157/5 264/15
 rough [1] 230/12
 roughly [6] 83/9 83/10 83/13 169/13
 290/11 311/5
 round [2] 41/4 179/16
 rug [1] 35/23
 ruin [1] 254/11
 ruining [1] 212/15
 ruled [1] 23/14
 rules [5] 96/13 220/22 233/22 233/22
 280/12
 run [4] 4/19 24/16 43/21 82/13
 running [2] 17/8 200/1
 rushed [1] 38/5
 Russell [1] 76/5
 Ryan [65] 4/19 5/1 5/8 5/13 5/23 7/12
 8/6 8/7 8/25 29/20 29/21 36/3 36/3
 60/22 69/12 69/13 69/20 69/23 70/5
 87/5 133/5 134/23 135/9 135/11 135/12
 136/3 136/8 140/16 145/3 146/25
 147/22 151/24 162/7 162/12 163/18
 164/19 165/7 166/1 173/11 174/12
 175/7 176/19 198/16 200/19 201/3
 206/12 208/12 208/19 211/11 218/6
 222/8 243/15 257/24 260/3 260/15
 265/14 276/2 294/6 314/2 314/16
 316/10 316/15 321/5 330/8 330/12
 Ryan's [3] 307/11 316/16 316/18

S
 S/Stacy [2] 329/16 329/16
 sacrament [1] 79/2
 sacrifice [1] 81/11
 safer [1] 327/16
 safety [1] 92/24
 said [42] 5/14 7/23 9/8 11/20 12/12
 14/14 27/1 31/16 36/23 42/12 43/11
 46/16 47/24 48/21 48/22 48/24 58/19

59/12 59/13 64/1 81/21 103/14 155/9
 155/10 180/3 182/18 196/14 197/9
 225/14 230/15 230/22 239/20 240/3
 247/18 247/24 252/1 255/21 260/4
 266/23 268/12 268/13 276/24
 sailed [1] 10/25
 same [47] 13/3 37/3 37/13 37/14 42/23
 63/9 89/21 90/11 90/17 90/22 90/25
 91/2 96/8 96/13 98/13 102/18 102/19
 116/14 139/25 140/2 155/19 186/11
 189/8 197/24 212/18 231/18 242/19
 243/3 243/5 243/16 248/18 248/20
 255/3 255/3 263/7 277/2 277/6 277/7
 277/18 283/22 294/7 295/14 295/23
 295/24 298/11 317/18 328/1
 sample [1] 275/3
 sanction [9] 12/25 16/18 16/20 16/25
 18/8 18/11 40/11 214/22 248/17
 sanctioning [2] 40/18 270/9
 sanctions [2] 283/24 287/20
 Sara [1] 192/13
 sat [1] 182/14
 saw [8] 6/4 63/1 116/14 169/25 178/23
 194/3 291/19 319/16
 say [111] 5/13 12/12 15/9 16/2 17/6
 21/17 24/24 26/19 28/18 35/23 36/17
 39/6 39/23 40/21 50/19 53/3 53/7 54/19
 55/21 58/10 58/23 59/8 59/17 67/4 77/9
 80/7 83/7 83/8 87/1 91/6 91/12 102/4
 118/21 119/21 125/8 127/23 139/11
 139/23 144/7 155/23 155/24 159/8
 169/19 181/24 185/22 187/17 187/22
 187/24 188/7 189/12 189/18 189/25
 190/2 195/16 213/24 215/1 215/6
 215/12 216/7 216/12 216/16 218/4
 220/20 220/24 221/19 224/12 226/17
 227/22 229/14 231/22 232/2 233/2
 235/12 235/13 238/10 240/1 240/18
 241/3 241/24 246/1 246/12 246/18
 247/10 250/16 250/18 261/3 261/23
 263/24 266/16 267/6 267/10 280/16
 281/22 283/16 283/25 284/25 289/2
 289/3 291/5 297/9 298/10 298/23
 305/14 305/23 306/16 307/3 307/6
 318/20 319/4 324/24 329/4
 saying [24] 12/12 15/20 17/12 22/17
 23/22 27/22 39/20 59/16 62/25 66/11
 90/4 98/5 102/7 133/17 133/18 190/2
 218/3 242/23 255/18 256/8 256/10
 271/10 301/11 308/4
 says [41] 16/8 28/13 29/9 51/15 75/9
 98/10 101/13 104/7 105/12 114/7
 120/14 121/9 128/22 129/6 144/6
 159/10 166/17 166/21 169/3 169/5
 195/8 206/17 207/2 207/5 207/13 236/9
 240/8 260/16 261/11 267/7 275/18
 281/7 282/13 297/17 300/9 300/11
 300/13 300/14 302/19 304/21 325/3
 scale [5] 16/4 19/4 19/17 26/15 34/14
 scenario [1] 308/9
 scenarios [1] 309/7
 schedule [9] 9/4 87/18 123/18 165/22
 222/13 222/13 246/10 287/24 298/1
 scheduled [2] 7/14 223/6
 schedules [2] 125/22 125/22
 scheduling [1] 114/14
 school [21] 24/13 41/7 64/22 66/13
 66/14 103/14 104/23 106/25 190/7
 213/12 213/13 213/22 227/5 270/9
 271/12 272/22 272/23 272/23 273/11

<p>S school... [2] 313/16 317/1 schools [3] 41/12 82/11 243/2 245/25 282/24 Science [1] 279/3 screen [6] 92/4 97/16 106/5 262/24 276/12 288/21 screens [1] 184/24 scroll [6] 92/3 106/5 110/4 121/8 128/3 165/10 scrutiny [2] 26/2 38/20 scurrying [1] 259/5 se [1] 109/15 seal [10] 3/3 133/9 134/6 134/11 197/13 303/21 316/3 320/10 325/21 327/13 seated [8] 44/5 44/17 61/8 69/9 69/18 133/4 200/8 200/17 second [56] 11/1 21/19 24/3 24/23 33/20 35/13 36/2 36/18 42/1 42/12 45/2 51/2 51/15 54/25 57/22 58/7 58/8 58/14 63/24 72/3 82/25 96/16 105/21 129/19 129/23 131/22 131/25 133/14 133/17 133/18 134/4 146/2 146/15 154/13 154/19 165/18 166/1 167/10 167/14 177/17 179/13 179/16 188/21 195/14 206/17 207/2 241/20 248/2 251/16 255/14 264/18 276/19 281/2 307/14 324/2 324/11 secondary [2] 18/25 279/2 secondly [2] 40/12 154/8 seconds [1] 55/1 section [6] 104/11 104/13 140/24 145/19 275/18 280/25 sections [6] 140/8 156/22 187/16 242/9 299/9 299/21 security [9] 49/7 49/15 49/18 53/21 53/24 54/9 73/18 98/16 203/1 see [142] 10/10 15/25 30/17 30/25 37/20 37/21 38/7 40/23 43/21 47/4 49/11 52/14 53/6 54/18 54/25 55/8 55/23 55/25 56/20 72/10 91/24 92/14 94/13 95/14 97/14 97/14 98/12 101/20 101/21 103/18 104/9 104/18 104/24 105/9 106/6 108/11 114/5 114/9 116/12 116/15 116/21 117/25 121/17 126/25 127/2 127/7 127/14 132/24 140/16 140/24 141/11 145/3 145/19 147/22 147/25 148/12 152/2 152/9 152/14 152/14 153/3 153/11 153/20 153/21 154/3 154/6 154/9 158/3 158/16 159/11 159/24 160/10 160/13 160/19 165/16 165/18 165/22 166/1 166/3 166/6 166/12 166/18 167/1 169/2 173/12 177/13 195/8 204/5 208/18 209/14 216/20 216/21 223/22 223/23 227/13 236/21 237/18 242/9 244/3 245/16 252/10 252/16 259/4 259/6 260/14 260/25 262/23 263/21 276/11 276/12 276/22 276/23 277/13 277/15 277/16 281/9 286/8 286/11 289/12 290/16 293/9 296/8 299/23 300/3 301/3 301/22 302/1 302/4 302/10 302/16 302/19 302/21 302/25 307/14 314/20 314/22 315/8 317/2 317/4 321/22 322/16 324/5 Seeberg [2] 108/19 109/7 seeing [6] 121/6 130/24 196/16 196/16 230/3 319/14 seek [4] 63/15 271/6 279/23 305/3 seeking [3] 13/14 25/23 38/19</p>	<p>seeks [1] 25/24 seem [6] 12/10 39/16 127/21 225/18 287/4 828/15 seems [5] 30/22 41/3 98/7 105/13 296/15 seen [18] 31/1 35/3 54/15 84/15 137/3 139/3 151/15 168/20 204/9 204/10 209/14 214/12 218/3 255/22 261/1 319/11 324/18 324/19 selected [2] 56/20 224/5 selecting [1] 209/1 selective [1] 40/14 self [4] 22/17 85/12 193/13 268/4 self-inflicted [1] 193/13 semester [10] 15/11 15/13 18/12 24/18 24/20 24/21 232/7 232/8 272/13 304/13 send [14] 94/21 96/5 96/16 197/19 197/24 207/24 242/1 267/11 284/25 285/2 298/3 298/7 298/10 298/10 sending [11] 56/25 92/10 92/25 95/6 95/23 95/25 96/2 96/7 96/10 111/5 241/25 senior [8] 30/16 44/25 61/19 61/23 61/24 186/10 265/3 310/15 seniors [3] 264/24 273/9 273/10 sense [16] 3/14 18/15 19/22 26/20 31/12 60/3 85/18 89/19 118/10 130/16 150/13 210/22 249/1 265/22 308/6 324/10 sensitive [3] 42/20 56/24 57/1 sent [22] 5/20 51/24 51/25 55/20 65/14 96/11 108/1 123/7 165/13 172/25 193/24 194/10 195/21 197/20 210/19 215/24 217/12 255/23 285/19 286/11 291/4 328/5 sentence [1] 166/2 separate [8] 26/13 49/13 56/21 56/22 142/25 236/12 294/9 298/2 separated [2] 49/2 272/15 separately [2] 142/20 263/11 separating [1] 89/21 September [4] 22/8 23/1 23/4 276/9 September 23 [1] 276/9 September 28 [1] 23/4 series [5] 133/15 151/10 260/1 297/4 311/14 serious [7] 27/16 34/10 57/5 225/25 232/4 232/12 282/7 seriously [2] 42/17 185/22 Serve [3] 230/1 230/3 277/15 served [1] 124/5 serves [1] 251/19 service [2] 99/7 260/18 services [15] 4/20 76/4 79/8 93/11 93/17 96/8 97/2 124/24 137/7 149/17 154/23 166/6 192/10 194/11 194/15 session [1] 223/7 sessions [1] 260/20 set [11] 5/22 10/5 21/20 33/3 189/25 241/10 272/14 280/13 282/18 315/7 316/4 sets [4] 27/12 29/2 104/6 187/9 setting [9] 191/16 203/5 212/1 212/17 216/7 232/21 245/3 286/5 306/23 settings [4] 203/2 203/3 245/1 281/12 settled [1] 217/22 seven [9] 116/19 126/18 134/25 158/15 189/9 221/20 248/22 248/24 252/6 Seventeen [2] 136/19 315/23 Seventh [7] 19/7 25/20 26/1 26/8 26/25</p>	<p>27/1 28/1 several [11] 3/24 19/24 77/23 89/14 96/25 138/3 144/17 163/17 184/35 185/5 257/15 severity [1] 213/25 sex [7] 80/11 89/21 237/15 237/20 237/22 240/8 240/24 sexual [42] 28/22 28/23 41/14 41/14 42/18 43/3 57/9 70/11 70/13 76/24 77/18 78/3 78/16 80/16 80/18 83/19 84/4 84/9 84/10 84/14 91/13 91/13 109/19 147/2 164/7 166/23 166/23 185/4 204/13 204/13 207/14 207/14 218/20 230/8 240/9 240/10 269/8 276/15 276/22 301/12 301/15 313/19 shaping [1] 266/10 share [39] 74/5 74/21 76/14 81/14 84/21 88/13 98/11 98/20 139/19 140/4 142/16 142/17 144/18 155/21 157/9 157/13 157/18 157/19 157/20 157/22 159/15 161/4 164/5 187/19 219/1 219/18 220/16 230/25 231/2 239/2 245/23 258/24 278/25 279/10 281/3 283/6 283/19 297/14 305/10 shared [21] 75/4 100/20 100/22 113/16 116/7 117/1 130/5 130/15 155/3 157/13 158/11 160/16 161/5 178/10 214/9 217/20 218/6 266/22 288/12 305/13 305/14 shares [1] 119/6 sharing [8] 90/7 117/7 119/7 138/6 157/12 157/22 178/13 240/12 she [181] 37/9 41/21 48/3 48/4 48/4 48/21 48/24 48/25 49/1 49/20 50/2 50/3 50/3 50/9 50/10 50/16 51/15 51/16 51/25 55/12 55/20 55/21 56/24 57/2 58/7 58/14 58/16 59/12 59/14 59/15 59/16 59/19 59/20 59/23 63/6 63/18 63/21 73/1 75/19 75/20 76/19 76/19 87/16 87/17 92/13 92/14 92/14 92/15 92/19 92/20 92/22 92/23 92/24 92/24 93/1 93/3 93/4 93/6 93/8 97/25 98/3 98/8 98/10 100/20 100/22 101/13 101/17 101/18 102/18 102/20 102/22 102/24 108/1 108/16 108/19 108/21 109/2 110/21 112/22 113/1 120/6 121/16 123/15 124/5 124/24 125/22 125/23 126/3 126/6 126/8 126/9 126/20 126/21 126/23 126/24 127/3 128/8 128/22 128/25 130/14 141/7 141/18 141/19 141/23 141/24 143/11 150/14 150/17 150/18 150/20 150/24 150/25 151/17 155/16 160/5 165/24 169/3 169/7 170/3 176/14 176/15 176/15 188/12 208/20 209/3 209/3 209/21 210/21 217/7 217/11 217/15 217/16 217/17 217/20 217/21 217/23 217/24 218/4 218/5 220/3 221/3 222/2 222/2 222/2 222/4 222/5 222/9 230/20 231/17 234/12 237/14 237/17 238/5 238/7 238/9 238/14 238/24 239/4 239/6 239/6 243/14 243/14 243/17 256/24 256/24 256/25 257/25 260/21 261/21 271/24 291/3 294/7 302/6 307/11 315/8 315/11 316/11 317/2 317/15 319/16 324/2 she'll [1] 165/21 she's [36] 58/9 58/20 60/3 106/24 107/4 107/5 107/24 108/2 123/24 126/9 126/14 128/10 128/14 132/4 160/6 171/10 176/17 209/19 209/20 210/9</p>
--	---	---

S
 she's... [16] 210/13 217/25 230/1
 230/22 256/25 259/15 259/18 271/46
 271/19 271/22 277/14 277/15 300/7
 313/14 324/3 324/24
 Shibata [1] 97/13
 shifted [1] 149/25
 ship [1] 10/24
 short [4] 60/22 137/14 213/23 301/14
 shortest [3] 214/8 214/25 215/1
 shortly [1] 182/15
 shot [2] 46/16 288/21
 should [26] 8/25 10/15 26/20 26/23
 27/2 56/16 65/3 65/8 98/10 100/13
 114/18 121/21 150/20 150/21 157/16
 180/15 216/16 216/17 222/9 227/6
 232/12 239/19 259/18 264/8 307/13
 327/20
 shouldn't [10] 38/7 48/22 256/8 258/20
 258/22 259/21 259/23 301/13 305/14
 308/14
 show [44] 16/6 19/2 19/7 19/9 19/10
 20/2 20/6 21/21 21/23 26/13 50/16
 94/25 107/17 108/8 110/2 119/12 121/6
 121/11 131/17 203/8 204/3 207/6
 216/19 221/23 223/13 226/11 240/17
 241/4 254/23 260/11 280/21 285/13
 288/19 296/3 299/18 299/25 302/9
 302/15 314/14 315/3 315/5 315/20
 316/16 318/24
 showed [4] 5/12 65/9 112/7 193/23
 showing [7] 151/9 173/11 250/17 253/5
 301/24 316/22 319/11
 shown [2] 34/22 35/2
 shows [6] 32/20 40/18 72/2 72/11
 72/13 194/3
 shut [2] 256/22 317/12
 side [8] 16/16 31/22 32/2 32/6 39/19
 41/10 141/10 189/9
 sides [2] 92/2 308/8
 sighing [1] 231/15
 sign [5] 216/14 217/11 244/24 245/1
 245/4
 signature [3] 92/7 95/2 255/5
 signed [3] 217/4 223/18 223/19
 significant [6] 37/21 98/1 211/14 249/13
 249/14 290/13
 signs [1] 279/20
 silent [1] 229/21
 silos [1] 272/12
 similar [17] 34/23 42/2 42/11 51/16
 59/16 95/8 111/6 113/8 113/22 114/18
 197/19 238/17 253/8 255/3 277/1
 282/19 324/4
 similarly [1] 34/22
 SIMON [6] 1/7 219/2 230/25 231/21
 250/15 297/14
 simply [3] 17/8 34/14 270/11
 simultaneous [2] 298/11 323/10
 simultaneously [1] 263/10
 since [15] 3/20 21/19 35/6 44/25 45/1
 61/20 61/21 126/16 166/21 180/16
 218/21 218/24 254/8 288/16 303/21
 sincere [1] 93/4
 Sincerely [1] 66/8
 singing [1] 307/22
 single [8] 39/6 214/14 214/20 263/10
 269/1 283/10 283/11 283/21
 single-space [1] 214/20
 sir [34] 2/12 9/20 39/21 52/4 52/9 54/5

57/22 61/4 61/14 65/13 67/10 68/11
 81/9 83/6 86/25 87/24 109/22 110/1
 112/1 112/2 121/2 123/25 128/19
 134/20 135/25 138/3 187/8 200/12
 278/21 298/16 314/21 315/8 317/8
 321/12
 sit [8] 40/21 41/18 73/24 76/14 218/19
 233/2 246/12 326/25
 sits [2] 71/16 76/1
 sitting [5] 62/20 63/4 130/17 262/2
 262/10
 situated [2] 34/23 60/23
 situation [25] 13/22 17/9 25/3 27/11
 32/21 35/1 35/19 38/8 39/17 75/7 85/7
 90/13 92/14 97/8 110/10 110/22 111/12
 127/24 141/4 206/10 213/14 227/11
 260/24 307/18 309/9
 situational [2] 118/20 125/1
 situations [4] 91/3 121/20 309/3 310/2
 six [18] 31/3 89/16 89/16 116/19
 141/24 142/2 164/22 194/14 194/14
 194/24 215/14 215/19 221/11 267/1
 284/9 284/14 284/14 303/10
 six inches [1] 221/11
 six-hour [1] 31/3
 sixish [1] 284/15
 size [1] 20/12
 skipped [1] 135/1
 skipping [2] 252/7 276/6
 skirt [1] 301/14
 sliding [5] 16/4 19/4 19/17 26/15 34/14
 sliding-scale [1] 26/15
 slightly [1] 150/16
 slow [3] 71/9 201/16 201/17
 slowly [2] 245/13 245/14
 small [4] 144/20 203/18 234/1 234/1
 smiled [1] 260/22
 Smith [1] 128/16
 snapshot [2] 311/7 311/9
 so [530]
 social [2] 148/5 157/24
 sole [3] 234/13 235/18 236/24
 solely [2] 70/17 72/16
 some [146] 3/1 3/8 4/4 5/25 9/3 11/22
 11/22 13/8 16/24 17/18 17/25 19/9
 21/23 27/23 28/9 30/2 30/24 31/5 32/12
 33/8 33/21 34/4 40/5 47/20 50/17 51/18
 54/2 54/22 55/17 55/20 56/23 62/21
 63/5 68/21 72/16 73/12 73/19 76/23
 77/16 79/4 79/8 83/2 83/4 83/23 85/17
 85/18 86/6 87/12 87/13 88/1 88/14 90/2
 91/4 91/5 97/4 98/2 98/24 99/14 106/25
 108/4 112/14 117/16 118/13 120/24
 123/21 125/14 125/17 129/10 131/3
 133/13 136/21 138/8 138/10 141/7
 142/12 144/19 144/22 146/4 149/15
 150/15 150/24 169/21 176/3 177/11
 178/5 179/3 183/2 183/2 184/15 185/1
 189/6 191/3 191/14 195/24 196/15
 208/19 213/21 213/24 219/19 221/17
 226/1 226/4 230/4 230/13 231/8 232/23
 233/16 235/1 236/9 239/10 241/13
 242/19 243/2 244/20 245/9 245/25
 249/9 254/2 254/10 254/17 273/4
 274/19 274/20 274/21 278/20 280/12
 280/13 280/19 283/15 283/17 283/18
 283/23 287/5 287/20 289/12 295/3
 298/9 300/19 301/18 303/9 307/17
 307/21 307/23 317/11 318/14 320/14
 somebody [41] 26/21 26/22 32/17

32/21 32/21 43/21 46/19 91/7 144/6
 186/17 186/18 210/18 220/19 225/11
 225/17 225/20 228/8 229/5 232/15
 232/24 234/7 242/19 244/13 245/8
 248/23 256/18 257/7 257/9 260/5
 263/12 264/12 267/5 267/7 270/22
 272/21 281/6 281/7 281/7 282/13
 297/12 304/19
 somebody's [2] 256/17 256/20
 somehow [3] 8/11 27/13 167/8
 someone [31] 55/3 64/24 82/22 87/21
 87/22 90/9 94/4 99/4 99/4 99/14 99/18
 103/12 116/6 119/5 119/6 142/1 162/21
 190/13 190/22 191/8 192/11 192/20
 192/25 196/15 231/5 232/2 240/23
 249/17 249/18 249/19 310/8
 something [55] 17/16 17/20 25/25
 26/22 26/22 54/4 59/13 78/23 79/1 79/7
 79/11 98/10 99/16 99/17 100/14 106/14
 108/4 109/24 123/7 123/7 124/13
 144/16 158/7 158/18 160/16 161/14
 166/8 166/14 173/20 181/7 190/7 206/3
 214/9 224/19 225/14 227/9 229/6 232/3
 238/9 239/4 239/24 241/25 243/10
 258/21 259/18 261/11 269/11 270/3
 283/11 296/24 305/7 328/12 328/18
 328/20 329/3
 sometime [3] 62/18 86/10 307/6
 sometimes [14] 21/15 21/24 74/14 90/8
 115/9 115/10 118/3 118/10 162/23
 163/20 226/23 260/5 282/13 290/23
 somewhat [5] 56/10 56/11 101/8
 127/23 139/7
 somewhere [8] 23/24 24/21 49/8 49/24
 50/20 52/24 144/25 247/25
 soon [5] 5/10 8/15 155/17 156/3 264/25
 sophomore [2] 61/21 186/18
 sorry [49] 9/9 16/9 26/6 46/3 49/5 50/21
 56/14 57/14 58/12 65/15 72/11 85/20
 89/4 91/25 92/5 94/8 94/11 104/10
 105/6 111/17 112/6 113/7 116/11
 118/18 119/15 120/8 120/9 121/3
 122/21 124/2 127/8 128/3 129/5 130/12
 136/19 167/7 179/12 188/22 195/6
 197/15 206/2 231/20 235/17 247/5
 252/22 256/6 271/9 315/24 326/4
 sort [113] 3/2 3/14 10/5 10/10 14/3 15/3
 15/8 15/24 16/4 16/10 19/17 19/17
 20/19 21/20 24/4 26/14 27/23 28/9
 29/21 30/24 33/13 33/21 34/13 41/10
 47/8 54/3 54/22 56/25 70/12 72/11
 72/13 72/19 74/25 76/23 77/16 78/1
 81/4 83/24 84/4 84/15 84/18 84/22
 85/11 85/12 85/12 85/13 85/15 86/18
 88/3 89/10 90/10 90/10 90/21 90/25
 91/12 91/16 91/17 96/5 100/6 102/1
 102/8 103/4 104/25 112/24 117/9 118/5
 118/18 118/19 124/3 124/3 130/18
 131/3 137/10 138/10 139/25 144/20
 145/11 145/16 149/23 150/1 156/13
 161/5 164/6 168/7 169/6 170/8 173/7
 176/3 176/6 176/10 177/24 180/18
 181/6 181/11 184/21 185/8 187/21
 190/24 195/19 196/6 196/23 196/25
 197/21 198/2 205/11 227/9 275/16
 284/21 297/6 299/3 308/18 323/11
 325/15
 sorts [1] 8/19
 sound [2] 33/12 111/23
 sounds [2] 130/21 254/6

<p>S soup [1] 224/9 source [2] 207/9 SOUTH [13] 1/2 1/16 1/16 1/21 10/16 10/17 10/18 18/23 137/8 137/9 137/10 137/16 137/18 space [9] 81/14 94/14 149/18 150/17 168/7 214/14 214/20 288/17 292/5 spaces [4] 81/13 81/21 142/25 197/23 span [1] 297/4 Spanish [1] 279/2 speak [17] 61/9 69/19 74/8 106/16 134/20 156/6 181/14 189/20 280/3 284/19 293/3 297/25 299/11 304/10 311/13 311/15 311/19 speak-up [1] 181/14 speakers [1] 245/13 speaking [10] 18/18 49/6 49/14 53/20 59/15 83/17 140/19 149/10 168/25 177/25 speaks [4] 26/8 26/16 38/18 232/21 specific [21] 54/7 54/20 79/2 84/16 85/10 89/13 112/3 117/8 124/6 127/21 138/2 139/9 156/22 190/21 193/16 195/19 195/22 247/16 251/7 294/10 296/12 specifically [16] 26/16 47/9 72/24 82/7 137/23 138/19 138/22 144/22 155/23 156/6 167/6 191/21 195/7 195/16 241/25 308/5 specificity [1] 238/3 specifics [1] 155/5 speculate [2] 71/1 97/3 speculating [2] 98/4 114/23 speculation [2] 59/25 227/20 speed [2] 131/12 134/14 spell [1] 293/14 spells [1] 195/11 spirit [1] 325/10 spoke [7] 49/3 49/19 96/19 96/21 173/4 240/18 323/23 spreadsheet [5] 196/18 196/19 196/20 197/2 197/6 spring [10] 18/12 24/17 61/21 179/22 185/3 304/13 317/23 318/3 318/4 320/4 square [2] 1/12 41/4 squarely [1] 43/3 St [3] 103/20 108/24 241/16 St. [6] 55/18 57/23 58/4 58/10 58/12 58/15 St. Mary's [6] 55/18 57/23 58/4 58/10 58/12 58/15 stack [1] 215/13 Stackman [22] 76/3 94/12 96/19 96/21 97/1 99/4 105/22 128/14 151/8 151/18 152/9 152/19 152/23 153/5 153/20 154/12 154/25 169/23 169/25 170/6 194/18 195/4 Stackman's [2] 152/10 172/20 Stacy [3] 329/12 329/16 329/16 staff [13] 73/16 89/6 124/2 149/15 161/10 202/12 202/25 216/3 219/2 220/10 244/15 248/4 270/6 stages [1] 142/11 stain [1] 24/4 stairs [1] 260/23 stairway [1] 260/20 stairwell [5] 49/16 50/12 59/5 95/20 260/18 stakes [1] 211/23</p>	<p>stalking [18] 32/21 70/14 84/15 91/14 148/13 148/15 148/16 161/6 166/24 167/6 176/10 207/15 257/4 261/21 286/19 313/19 317/19 317/24 stamp [3] 95/5 132/3 197/14 stamped [4] 91/24 100/25 104/5 131/18 stand [3] 20/17 44/8 219/12 standard [20] 21/20 26/2 26/17 27/2 27/3 30/22 33/16 33/21 76/21 94/23 104/22 111/9 153/15 185/9 207/9 257/3 257/5 257/6 267/1 280/25 standards [65] 29/2 29/11 31/7 33/1 33/3 64/25 71/7 82/23 86/17 86/18 88/19 89/1 114/7 114/12 115/8 115/15 121/22 122/11 122/13 122/15 122/18 123/8 136/16 137/13 140/9 143/2 144/23 145/6 145/8 145/10 145/13 145/20 145/23 149/14 158/9 158/10 160/8 176/20 177/23 180/11 180/25 181/2 189/23 190/12 198/19 199/9 201/4 202/7 202/8 202/21 207/25 220/8 229/2 229/9 231/8 244/10 255/21 260/9 267/1 280/12 280/14 282/22 300/7 304/20 314/20 stare [1] 233/2 staring [1] 231/15 start [13] 2/12 4/18 7/21 9/7 10/9 28/11 82/16 87/13 202/14 219/25 240/11 246/13 288/25 started [11] 59/9 73/6 100/17 201/13 201/25 213/6 213/8 213/12 218/21 224/19 227/12 starting [3] 3/21 28/4 107/24 starts [6] 140/25 166/2 177/16 240/24 241/11 248/1 state [7] 2/10 48/3 70/3 137/24 200/25 283/4 283/6 stated [2] 249/2 249/12 statement [11] 127/5 144/9 238/17 240/25 244/22 255/17 255/24 280/24 294/24 304/7 315/18 statements [14] 14/3 31/5 59/20 125/19 125/21 142/15 153/1 154/20 192/25 206/24 230/17 252/25 254/21 277/5 states [4] 1/1 1/7 232/23 234/13 statistical [2] 197/3 197/7 statistics [2] 21/23 312/21 status [5] 16/18 25/20 27/7 27/23 186/12 statuses [1] 217/23 stay [5] 169/25 192/6 234/23 288/5 298/20 steady [1] 130/22 Steibe [1] 72/8 Steibe-Pasalich [1] 72/8 stenotype [1] 1/24 step [15] 15/8 19/8 27/21 30/4 37/22 71/21 86/2 87/17 87/18 199/24 204/21 204/25 298/20 298/23 321/12 STEPHANIE [2] 1/15 2/25 steps [8] 75/1 94/5 139/17 180/12 205/6 205/6 205/14 261/13 still [23] 5/4 15/3 16/20 16/20 16/21 16/24 17/13 17/19 18/8 18/8 21/23 24/19 43/15 55/3 117/17 118/25 129/4 218/7 234/11 256/10 270/23 271/3 305/11 stipulate [3] 274/19 275/3 303/6 stipulation [3] 225/7 321/19 328/15 Stockholm [1] 317/2</p>	<p>stop [8] 14/25 27/6 33/10 35/14 126/24 212/12 234/19 240/12 stopped [13] 59/9 100/3 260/21 story [2] 66/23 250/19 straight [1] 233/2 strategic [1] 8/19 straw [3] 246/25 247/1 247/6 stream [1] 130/22 streamlined [1] 4/17 Street [3] 1/12 1/16 1/20 strike [3] 39/16 237/16 261/25 strikes [4] 32/20 35/10 296/19 324/9 string [1] 241/5 stronger [1] 16/5 structure [1] 72/13 student [184] 9/25 14/22 17/7 17/9 17/19 18/19 20/16 22/12 24/24 27/18 27/24 29/7 29/8 29/18 33/25 34/1 34/7 37/23 38/8 39/1 42/16 44/8 46/22 57/3 57/13 57/16 57/25 58/2 58/4 58/10 58/12 60/25 65/4 70/25 71/21 72/14 72/18 72/24 73/2 74/9 74/11 74/13 74/20 76/3 76/4 76/5 79/18 84/20 86/14 92/10 92/11 92/20 108/24 109/4 111/9 115/18 115/23 116/1 116/4 124/6 125/1 125/5 125/5 126/24 127/6 128/21 128/25 129/2 137/24 138/7 140/7 145/11 149/16 149/18 153/8 153/13 154/23 158/25 159/2 161/15 161/22 178/24 184/8 185/7 186/1 186/2 186/4 186/4 186/12 191/22 192/2 193/24 201/13 201/14 201/20 201/23 201/25 202/3 202/5 202/16 202/17 203/14 203/18 204/23 205/18 211/24 212/6 212/24 213/5 213/23 214/4 224/5 224/15 226/18 229/1 232/21 233/1 233/22 235/8 235/8 235/13 236/7 239/2 239/25 240/2 240/5 240/7 240/9 240/12 240/15 240/16 240/17 251/12 262/10 262/14 266/21 270/11 270/13 272/10 272/12 273/2 276/20 277/15 279/5 279/14 279/14 279/16 279/19 279/20 280/1 280/6 280/13 280/17 280/25 283/5 284/25 285/3 285/6 287/7 287/25 288/15 289/2 289/5 292/6 294/2 295/11 297/11 297/16 298/8 298/14 304/5 304/6 304/16 305/2 305/3 307/3 309/9 309/14 309/20 310/9 310/11 314/18 330/3 330/6 student's [7] 28/16 81/11 224/2 224/17 270/16 272/17 293/18 students [76] 5/24 6/25 7/22 8/14 11/14 14/4 27/10 29/3 29/5 29/6 29/7 29/9 29/11 30/15 33/4 38/25 42/18 42/18 43/3 70/10 80/21 90/6 98/1 102/9 124/3 125/23 137/1 137/6 144/13 144/25 145/16 145/18 157/11 184/8 184/14 184/22 191/18 202/20 202/20 202/25 207/24 212/5 212/12 213/24 214/2 228/18 231/1 233/25 239/1 265/16 265/19 265/21 269/8 269/25 273/4 279/16 280/16 280/20 282/4 282/20 288/6 290/23 292/14 293/9 294/21 294/22 296/13 298/1 298/2 298/9 300/19 300/20 309/14 309/18 310/3 317/25 studied [1] 26/25 study [2] 211/19 282/14 studying [1] 279/3 subject [10] 39/18 42/4 139/1 139/9</p>
---	--	--

S
 subject... [6] 228/9 271/20 288/7
 289/15 289/17 306/1
 subjective [4] 118/22 257/6 257/10
 261/20
 submission [2] 182/2 278/8
 submit [18] 30/8 159/22 171/19 190/5
 190/15 243/18 274/19 275/9 290/8
 290/14 292/13 292/18 294/19 300/21
 310/25 321/20 323/19 326/15
 submitted [18] 118/4 146/4 160/11
 176/22 176/25 177/22 181/13 191/6
 210/14 215/8 242/19 253/9 253/16
 254/14 259/12 290/6 291/2 314/20
 subpoena [3] 4/7 60/16 315/12
 subpoenaed [1] 32/2
 subsequent [1] 272/22
 substance [7] 85/2 85/8 175/22 212/13
 218/9 263/23 309/16
 substantial [6] 42/15 250/10 251/3
 251/4 251/13 274/11
 substantiate [1] 77/8
 substantive [5] 251/4 251/11 263/24
 282/18 306/14
 succeeding [1] 247/11
 success [10] 16/4 19/3 19/20 20/3
 26/13 28/4 30/17 34/11 171/15 305/17
 successful [2] 212/8 212/25
 such [9] 27/5 38/3 40/16 112/11 183/5
 203/21 233/11 244/18 280/19
 Sue [1] 72/8
 suffer [2] 16/7 18/19
 suffering [2] 191/22 225/20
 suffers [1] 80/16
 suggest [1] 296/15
 suggested [4] 13/8 21/7 47/6 134/5
 suggesting [2] 98/7 327/13
 suicidal [10] 93/5 101/18 101/24 127/7
 192/14 229/1 237/15 237/20 304/19
 317/15
 suicide [9] 85/3 94/6 107/3 108/25
 109/2 193/4 238/15 317/12 324/6
 Suite [1] 1/12
 sum [2] 85/2 85/8
 summaries [3] 187/16 210/25 215/9
 summarily [1] 15/12
 summarize [1] 187/18
 summarizes [1] 126/6
 summary [12] 126/20 126/23 127/5
 160/7 175/8 175/11 206/23 209/16
 210/15 214/23 237/19 238/6
 summer [6] 137/10 201/23 202/15
 297/18 311/5 318/12
 summons [2] 211/20 211/22
 super [5] 28/22 33/13 40/21 323/7
 328/24
 supervise [1] 202/12
 supervises [1] 149/17
 supervision [1] 29/25
 supervisor [4] 149/16 219/12 268/11
 279/18
 Supp [1] 22/23
 supplement [13] 239/10 239/14 240/2
 241/12 243/7 289/23 290/5 290/8
 290/14 290/16 322/20 326/12 328/9
 supplemental [5] 159/22 160/3 160/11
 293/8 306/3
 supply [2] 112/22 112/22
 support [9] 84/1 137/7 154/9 159/19
 166/12 170/7 208/17 266/17 267/20

supporting [3] 190/6 190/15 230/7
 supportive [1] 116/5
 suppose [4] 187/4 191/12 308/11 311/9
 supposed [1] 209/19
 supposedly [1] 318/12
 Supreme [1] 250/15
 sure [160] 2/13 3/6 3/13 3/16 10/13
 11/2 13/2 14/10 14/13 20/24 23/20
 26/25 30/5 31/20 32/5 32/5 34/13 40/1
 41/2 44/11 44/13 45/6 45/7 45/10 46/4
 46/8 47/19 48/8 51/5 52/2 52/25 54/8
 54/24 56/15 57/15 58/15 58/20 60/3
 61/3 61/8 63/25 65/6 65/22 69/3 69/4
 69/18 70/5 71/13 74/18 80/21 81/21
 81/24 83/1 83/3 83/25 85/19 86/3 89/5
 89/12 89/22 90/5 90/19 94/9 95/7 95/9
 95/22 98/4 99/8 105/23 106/1 112/3
 112/3 113/14 114/25 115/2 115/24
 118/25 121/16 121/25 123/15 126/13
 126/13 127/22 129/24 130/2 130/7
 131/15 131/24 134/21 136/23 137/21
 139/13 140/12 147/9 151/13 151/22
 158/23 159/8 162/5 162/9 164/25
 169/11 172/9 173/1 173/4 173/7 175/4
 185/3 185/11 188/24 191/23 192/7
 193/22 194/8 194/9 195/5 198/9 199/7
 202/11 203/11 205/17 210/23 212/4
 215/10 216/2 217/19 219/25 227/24
 231/24 232/17 233/13 233/18 238/21
 241/21 241/24 243/17 244/15 256/23
 273/12 273/15 273/19 273/21 275/6
 276/16 278/22 279/1 279/12 280/6
 281/25 288/23 289/2 289/6 290/23
 303/22 304/14 310/18 313/10 320/9
 325/5 329/7
 surprised [2] 194/23 230/11
 surrounded [1] 311/20
 suspect [1] 165/11
 sustain [1] 267/13
 swear [2] 44/14 200/13
 Switch [1] 171/12
 SWORN [2] 69/20 200/19
 syndrome [1] 317/2
 system [3] 181/14 204/14 282/5
 systematically [1] 255/8

T
 table [5] 6/8 70/20 318/12 318/21
 326/23
 tabs [1] 299/16
 take [72] 3/6 7/3 7/17 9/16 11/16 11/20
 12/24 14/18 15/2 15/9 15/23 16/17
 17/13 18/20 18/23 23/21 24/8 24/16
 27/24 44/13 49/3 49/13 49/23 54/14
 54/17 60/22 61/5 64/2 68/14 68/16
 69/15 79/13 94/4 125/18 162/7 166/17
 169/10 169/11 185/22 199/10 200/1
 212/19 213/8 213/10 213/12 213/13
 222/23 223/2 246/3 246/25 247/1 247/6
 248/23 256/13 256/25 259/13 260/13
 264/9 269/16 270/13 271/2 271/9
 271/19 273/17 273/22 282/13 287/4
 292/3 292/5 307/13 324/15 328/23
 taken [7] 30/4 52/15 53/2 125/21
 168/17 212/21 259/4
 takes [5] 15/15 37/21 223/24 258/24
 301/4
 taking [18] 12/8 15/8 16/23 42/17 49/24
 62/23 74/19 173/3 208/8 208/8 208/10
 212/7 218/7 224/16 245/9 264/25

282/11 325/9
 talk [55] 3/17 6/1 8/13 11/1 36/17 74/19
 76/13 79/15 76/16 80/5 82/22 89/4
 105/4 115/15 123/1 126/1 138/14
 139/17 142/11 143/2 144/23 157/9
 157/17 157/18 158/9 167/5 169/5
 184/21 184/22 187/7 187/19 188/18
 189/23 190/2 195/18 205/5 205/8
 205/11 217/24 224/7 227/3 228/1 231/1
 237/14 238/14 264/18 266/9 281/2
 286/4 288/7 296/23 298/21 298/24
 316/11 327/3
 talked [25] 5/12 17/4 20/9 66/11 139/7
 141/3 142/7 156/13 156/14 156/14
 167/6 184/7 196/13 197/12 202/18
 203/7 218/4 224/16 227/9 257/20 264/8
 293/8 313/25 314/1 317/6
 talking [53] 7/20 8/11 20/18 38/14
 38/15 41/24 58/6 62/21 63/2 63/5 74/11
 75/9 82/6 83/12 91/1 96/24 99/12
 103/20 118/19 144/21 161/8 173/23
 179/15 198/23 205/9 210/8 210/9
 210/10 215/6 215/7 215/7 216/23 224/9
 226/23 226/24 233/23 245/8 245/9
 254/11 256/13 261/19 265/17 265/18
 271/13 285/10 285/11 294/7 295/12
 296/22 311/7 318/16 324/2 324/25
 talks [13] 58/13 58/14 117/22 117/24
 158/15 178/13 185/4 195/12 195/12
 281/1 287/11 292/10 292/12
 tangent [2] 212/11 227/1
 task [2] 125/17 234/23
 taxing [2] 327/8 327/8
 Taylor [1] 1/16
 team [1] 216/3
 technology [1] 50/24
 tell [46] 5/24 8/16 11/7 48/25 62/17
 66/9 86/15 92/19 92/20 92/23 95/5
 110/3 111/15 112/5 112/16 113/15
 115/17 116/24 117/5 119/13 120/2
 120/6 120/23 121/12 123/12 128/2
 128/20 131/18 145/5 157/20 162/15
 173/14 175/7 185/2 189/17 189/20
 190/14 195/21 216/1 241/23 249/8
 250/19 304/19 309/6 324/8 324/20
 telling [7] 28/13 107/5 112/8 214/11
 226/3 240/23 264/4
 tells [1] 88/11
 temper [1] 318/24
 template [4] 104/25 110/13 111/21
 111/23
 Temporary [1] 20/5
 ten [1] 235/11
 tendency [1] 256/17
 tender [1] 303/12
 tenor [1] 38/7
 term [13] 20/8 20/10 20/11 74/21 90/14
 91/9 95/18 212/23 228/8 231/14 245/25
 301/9 324/10
 terms [61] 15/17 26/1 26/9 27/20 30/18
 33/19 34/16 35/12 38/1 59/22 70/22
 74/16 77/14 81/20 85/14 100/2 103/4
 118/15 123/1 138/8 140/2 141/4 141/14
 146/4 154/18 157/11 159/24 169/23
 170/13 180/7 180/12 181/23 198/16
 199/21 208/24 209/19 211/12 216/24
 218/15 224/7 245/15 245/20 247/12
 248/17 254/3 261/19 264/7 266/9
 266/13 275/24 278/8 282/25 292/8
 295/21 295/25 299/21 299/23 307/24

T
 terms... [3] 308/18 315/21 324/5
 terribly [2] 7/3 9/6 30
 terrorized [2] 148/19 148/21
 test [2] 16/1 26/15
 testified [4] 66/24 151/16 178/25
 297/21
 testify [9] 7/22 45/12 62/2 64/12 317/11
 317/19 317/23 318/11 318/13
 testimony [8] 150/7 219/11 275/17
 311/22 314/7 318/2 318/23 325/5
 text [46] 4/7 23/10 23/11 23/16 31/10
 31/22 33/7 110/11 153/1 157/23 195/19
 210/25 222/4 236/9 241/17 242/7
 244/20 256/15 260/1 274/19 275/3
 297/10 310/21 311/1 311/8 311/11
 311/14 311/21 312/1 315/7 316/5 316/8
 316/12 316/22 317/3 318/15 319/10
 319/14 320/12 321/20 322/22 324/5
 325/25 326/7 326/9 326/13
 texting [4] 93/1 93/6 118/5 127/21
 texts [16] 31/1 31/5 31/17 31/25 32/4
 40/21 62/24 86/4 92/15 99/15 150/14
 297/4 315/12 315/13 315/16 315/22
 than [47] 16/23 20/16 21/22 32/14
 32/21 32/25 54/14 54/20 71/8 83/20
 84/14 96/6 98/11 98/14 117/23 118/20
 126/12 150/18 157/6 173/17 173/24
 181/6 186/23 215/21 228/10 229/8
 229/8 233/24 235/8 240/1 244/22
 263/23 269/12 272/4 274/20 276/1
 280/15 285/19 287/14 291/6 315/13
 321/18 321/21 322/3 323/10 328/20
 329/4
 thank [79] 2/13 7/10 25/13 25/16 25/17
 39/21 39/22 43/11 43/20 43/24 45/8
 52/3 52/4 52/6 58/24 60/8 60/11 60/12
 60/17 60/18 60/20 61/11 64/8 66/6
 66/20 68/8 68/11 68/13 68/19 69/11
 72/12 85/22 88/18 91/19 92/5 94/10
 107/15 108/13 110/4 113/7 127/12
 131/23 135/25 147/25 186/24 186/25
 188/1 199/23 199/24 200/14 200/18
 200/25 221/8 255/16 261/3 272/4 274/8
 276/5 277/21 278/7 278/10 278/11
 278/12 278/14 300/9 303/23 312/17
 313/23 319/15 319/21 319/22 320/7
 321/12 321/13 327/1 327/2 327/11
 328/17 329/5
 Thanks [2] 44/12 329/6
 that [2034]
 that's [327] 3/15 3/16 6/10 7/1 9/8 9/9
 9/23 11/13 11/18 12/11 12/20 14/8 16/1
 17/8 17/10 18/10 18/21 18/25 19/14
 19/18 20/1 20/7 20/18 20/19 21/7 22/3
 22/19 22/21 22/24 23/18 28/23 31/6
 31/6 31/16 32/19 32/19 34/7 35/1 35/1
 35/2 35/12 35/17 35/20 36/25 37/16
 38/6 38/20 40/19 40/24 43/14 43/15
 43/18 50/11 50/13 51/4 58/21 60/1 71/5
 71/5 71/22 72/4 72/8 74/20 74/25 75/2
 75/22 77/16 78/21 78/25 79/7 79/25
 80/3 80/14 81/24 84/22 84/24 85/15
 86/9 88/2 90/19 91/7 91/12 91/17 91/18
 92/7 94/1 95/2 98/22 99/25 100/5 102/5
 103/17 105/13 105/22 107/4 107/7
 108/15 109/5 109/20 110/11 110/25
 111/6 111/8 111/25 112/21 113/21
 115/4 115/4 115/6 115/7 115/9 116/21
 118/8 119/10 121/13 122/2 122/9

122/15 123/2 127/18 128/12 128/12
 130/10 131/4 134/5 135/19 136/5 142/7
 143/23 147/3 141/4 144/10 160/8
 161/14 162/23 169/24 170/5 170/8
 173/15 181/7 181/9 185/1 185/8 185/9
 185/20 186/13 188/15 189/8 189/16
 189/19 190/24 194/8 197/12 197/24
 198/17 199/9 203/22 204/12 205/23
 205/23 206/6 206/7 206/13 206/14
 206/16 208/5 208/6 209/3 209/11
 209/11 209/17 209/23 210/2 210/12
 211/21 212/9 213/5 214/7 215/2 215/22
 216/9 217/2 217/6 217/9 217/13 218/10
 219/9 219/14 220/10 221/2 221/7
 222/25 227/10 228/8 229/1 229/6 229/7
 229/9 230/24 231/2 231/17 231/18
 233/14 234/22 235/9 237/9 238/6 239/4
 239/20 239/22 239/24 240/1 240/3
 242/1 242/1 242/16 242/25 243/23
 244/5 245/2 245/2 245/5 245/12 247/24
 248/13 248/24 249/24 252/16 253/19
 255/7 256/3 256/8 257/2 257/2 257/11
 260/1 260/4 261/2 261/12 262/7 262/17
 263/18 264/14 264/17 264/19 265/2
 266/19 267/18 268/19 269/11 269/15
 270/12 271/5 271/16 271/21 273/25
 275/23 277/18 277/20 280/10 281/10
 285/12 286/9 286/10 286/14 286/17
 287/3 287/7 287/8 287/11 287/18
 287/20 287/23 288/3 288/21 290/2
 291/15 292/14 294/11 294/12 294/15
 295/14 295/15 297/20 297/23 301/6
 301/14 301/17 301/19 301/20 303/6
 304/3 304/20 304/24 305/7 306/9
 306/10 306/14 306/14 306/24 306/24
 310/23 311/9 312/14 312/15 313/1
 315/18 315/19 315/25 317/17 318/9
 318/15 318/22 319/21 320/12 320/20
 320/24 321/8 323/7 323/12 323/14
 325/3 325/14 326/16 326/22 327/21
 328/23
 their [50] 2/10 8/17 9/4 27/13 39/5
 41/12 41/13 43/15 43/23 47/2 47/20
 51/22 61/2 80/21 81/14 81/24 86/20
 89/2 98/11 111/22 125/22 139/17
 139/18 142/2 143/2 144/13 157/12
 168/10 170/22 176/21 184/1 191/12
 214/2 229/19 230/6 232/10 232/16
 233/3 260/19 270/22 270/24 272/12
 282/12 282/21 284/10 291/16 292/6
 294/23 306/14 309/12
 them [146] 5/3 5/6 5/10 5/11 5/16 5/17
 5/21 5/24 7/5 7/7 7/13 7/14 8/2 8/7 8/16
 8/24 9/4 9/5 9/6 9/7 9/10 9/19 9/21
 10/13 14/5 16/9 20/22 20/22 21/5 21/13
 26/12 30/7 31/10 31/10 31/11 32/5
 32/22 33/3 40/9 41/17 46/19 47/17 49/2
 49/13 50/25 51/20 52/16 52/20 64/25
 73/20 74/4 75/5 76/13 76/13 76/14
 76/15 89/16 90/25 97/5 98/13 99/19
 100/15 111/22 118/10 118/15 119/19
 125/23 126/25 132/16 137/6 139/24
 162/22 163/8 164/9 170/16 170/21
 170/23 176/18 182/15 182/20 182/21
 185/6 186/20 189/17 189/20 195/1
 196/25 203/2 211/11 215/25 222/5
 222/9 227/2 228/4 229/3 230/4 232/4
 232/16 240/13 242/21 242/22 245/8
 245/10 248/5 253/1 254/15 256/6
 260/19 265/4 265/20 265/24 266/17

266/19 267/6 267/12 267/13 269/25
 277/5 280/12 280/13 282/12 283/18
 283/24 289/9 297/19 298/3 298/8 298/4
 308/25 310/25 313/8 318/19 319/12
 319/13 319/14 320/14 321/21 322/5
 322/6 322/8 324/20 326/1 327/15
 327/15 327/22 329/7
 thematic [1] 326/5
 theme [1] 255/22
 themselves [2] 232/21 232/22
 themselves [3] 43/1 193/1 215/5
 then [197] 4/4 5/10 5/11 5/23 5/23 7/5
 7/7 8/13 10/5 10/11 12/19 14/4 15/16
 18/7 18/23 19/2 19/10 20/3 22/6 24/3
 35/24 43/6 48/24 49/7 49/23 49/24 50/6
 50/10 51/23 52/24 70/15 71/20 72/7
 73/22 74/20 75/5 75/5 75/12 76/14
 76/16 77/1 77/4 77/21 78/4 80/5 81/6
 81/17 82/2 82/3 84/17 85/14 86/6 86/12
 86/14 86/15 87/6 87/20 87/25 87/25
 88/12 88/15 88/24 90/7 90/22 90/25
 91/8 92/9 94/13 94/25 97/1 99/13 99/25
 100/13 101/17 101/18 105/15 105/21
 108/8 111/9 121/17 125/25 126/3
 130/11 132/17 137/3 137/12 138/16
 139/5 139/11 139/16 139/19 139/24
 140/3 141/22 142/5 142/7 142/9 142/16
 143/1 143/8 143/11 144/22 150/4
 150/16 152/14 153/20 157/14 164/7
 164/8 168/1 169/7 175/18 176/12
 176/18 176/22 180/14 180/15 181/24
 182/6 182/8 188/1 189/4 189/9 194/4
 194/5 202/2 202/6 202/23 208/20
 208/21 208/21 209/24 211/1 211/5
 212/16 212/16 215/19 216/14 216/15
 216/24 217/8 219/11 219/23 220/3
 222/19 229/3 231/11 235/12 236/19
 236/23 237/23 241/10 243/21 244/24
 245/15 246/4 248/22 249/3 249/17
 249/19 249/20 253/4 253/10 253/10
 254/23 260/8 268/18 275/5 275/7
 275/19 278/7 279/17 279/19 280/1
 281/21 283/19 283/20 284/25 287/15
 289/24 295/11 298/7 298/10 299/8
 299/10 300/13 300/16 300/17 301/1
 301/4 302/6 302/21 304/5 309/12
 315/20 327/4 327/14
 theories [3] 19/24 40/13 41/16
 theory [3] 40/14 40/25 41/19
 therapist [7] 224/24 225/20 226/4 227/8
 227/13 227/17 228/7
 therapists [1] 224/13
 therapy [5] 213/8 224/19 224/20 227/12
 260/19
 there [228] 3/1 4/4 7/24 8/15 8/19 9/3
 14/25 17/20 20/9 20/21 21/2 21/13
 21/17 22/9 23/8 23/13 26/12 28/4 28/9
 30/2 30/23 32/6 33/6 33/12 33/21 34/2
 34/5 34/15 35/14 35/16 37/12 39/5 39/6
 42/11 42/15 45/21 47/7 48/11 48/24
 53/22 54/6 55/17 57/10 57/15 63/5 65/8
 66/3 67/21 72/2 72/12 73/14 74/15
 76/23 77/7 77/18 77/22 78/19 83/23
 84/7 84/19 90/2 90/7 90/13 91/3 92/3
 92/7 96/8 97/21 100/13 100/16 105/9
 105/14 108/7 117/10 120/9 121/6
 122/12 122/24 122/25 127/19 128/1
 129/17 130/3 141/1 141/10 141/11
 141/23 142/25 144/15 145/3 146/4
 147/22 149/2 149/25 152/2 152/14

T
there... [132] 152/25 153/21 154/18
156/17 156/24 157/23 158/12 159/15
160/8 160/25 164/6 167/22 169/19
169/21 172/6 174/12 174/20 177/11
178/24 181/15 183/8 184/15 185/7
185/21 186/15 186/17 188/19 188/25
191/3 191/21 192/22 195/11 197/23
198/17 199/3 204/1 210/5 210/18
210/20 212/19 213/24 221/4 221/25
224/11 225/11 225/18 225/19 228/7
229/15 232/25 233/2 233/17 235/12
240/18 243/9 243/14 244/22 248/10
250/7 250/8 250/9 251/6 251/7 252/10
252/10 252/24 253/2 254/13 254/17
255/11 255/18 257/14 258/8 259/11
261/7 261/20 262/1 263/12 266/6 266/6
266/16 267/8 268/16 268/17 269/21
270/24 272/11 274/10 277/16 281/7
283/15 283/15 283/16 284/5 285/25
286/2 287/9 287/15 289/13 290/20
291/13 291/18 293/20 295/3 295/7
297/3 298/9 298/14 300/3 300/9 301/12
303/25 304/14 304/17 305/12 305/24
306/7 307/2 307/21 308/11 308/18
310/2 311/17 313/2 313/2 316/11 317/4
317/20 317/25 318/22 319/14 321/25
there's [111] 3/8 4/12 11/3 14/21 15/3
16/8 17/20 20/7 20/12 21/9 21/12 21/23
23/22 26/2 26/4 26/19 31/6 32/12 32/18
33/12 33/22 34/11 34/22 38/20 40/14
40/25 49/18 50/7 50/25 53/23 53/25
56/21 57/22 58/19 72/18 72/21 76/24
78/14 79/4 82/5 86/15 87/2 90/15 91/8
97/12 97/19 106/13 109/15 117/19
120/6 122/9 122/14 130/21 133/25
143/11 144/3 144/16 144/19 153/19
160/10 162/25 164/22 165/11 167/7
168/2 168/17 186/20 194/3 198/2 205/2
208/20 212/20 214/18 217/20 218/15
218/24 219/16 220/8 220/8 220/9 225/3
232/4 232/8 232/9 233/11 236/12
242/17 242/23 243/1 244/23 249/3
249/23 250/14 251/16 257/10 265/1
268/14 275/18 280/19 281/8 284/22
286/8 289/23 290/20 299/7 299/16
301/19 306/11 307/23 309/8 320/16
thereabout [1] 232/7
thereafter [3] 155/18 156/3 181/12
therefore [1] 194/17
these [136] 6/24 9/25 10/1 10/11 14/6
16/23 17/13 26/12 27/15 29/15 30/3
30/20 31/17 32/3 32/3 33/7 33/9 33/9
33/10 34/1 34/8 36/25 37/10 38/6 41/16
42/20 43/22 50/11 53/2 54/9 56/20
65/22 67/3 71/17 76/7 80/6 80/24 89/9
91/8 95/4 97/7 110/16 114/11 116/20
118/13 118/13 131/18 133/13 134/6
138/20 139/2 142/11 146/5 146/6 146/6
146/9 152/18 152/20 152/22 152/23
153/2 157/21 166/18 167/10 179/19
180/4 180/23 181/10 181/25 182/14
184/9 185/18 186/1 194/22 203/19
203/24 212/20 212/24 216/7 216/9
218/20 218/23 219/3 219/6 222/15
222/21 230/7 232/25 233/22 235/7
236/9 236/14 245/1 246/9 247/15 248/6
256/10 258/11 260/5 265/17 265/19
267/18 269/19 273/2 280/19 282/19
283/14 285/7 287/4 287/6 288/5 289/8

290/21 293/16 299/21 301/17 303/12
305/6 307/25 308/7 311/11 311/25
312/3 312/6 316/22 318/15 320/8
321/23 322/10 322/11 322/21 322/23
324/5 326/3 326/4 326/9
they [354]
They'll [1] 278/3
they're [7] 35/18 87/6 125/3 190/20
211/12 232/5 233/1
thick [2] 215/18 215/20
thing [13] 27/14 27/20 34/16 40/20 54/7
85/11 116/14 137/2 163/20 220/20
275/3 322/12 326/25
things [29] 3/17 6/5 11/10 21/10 36/25
40/4 59/16 82/3 123/21 131/12 134/14
137/11 149/23 149/24 150/1 185/20
190/21 192/8 211/13 218/7 230/15
236/12 237/9 251/15 254/18 258/11
274/20 305/9 312/3
think [150] 2/11 3/23 3/24 4/6 4/8 6/19
7/2 7/3 7/14 8/7 9/15 9/23 10/16 11/11
11/13 11/13 11/18 12/11 16/6 17/16
18/17 18/18 19/6 19/7 19/14 19/17
20/19 20/21 21/9 22/3 22/4 22/25 25/19
27/4 27/20 28/1 28/12 28/23 29/19 30/1
30/25 31/16 32/2 32/11 32/22 33/7 33/9
33/12 33/19 34/11 34/17 35/12 35/14
35/15 36/2 37/4 37/15 38/13 38/18
38/22 39/11 39/12 39/16 41/25 43/23
52/1 54/6 60/1 77/21 77/22 78/13 80/20
82/4 82/9 85/10 93/6 93/22 95/17 95/17
96/21 100/22 102/6 104/22 104/25
105/12 112/2 114/18 114/20 114/25
115/24 116/6 119/22 125/7 127/25
141/22 149/9 151/1 151/15 157/3 161/7
164/12 171/10 171/14 185/4 185/21
186/22 188/19 194/1 195/14 208/5
215/14 225/23 228/14 236/12 237/16
240/17 243/9 247/24 250/14 251/18
253/16 261/18 261/22 266/24 271/16
274/15 276/6 280/3 281/25 283/9
284/14 284/14 285/13 298/18 302/15
303/11 304/22 305/25 309/8 313/17
313/21 316/17 320/24 321/11 324/25
325/4 327/6 327/12 327/24 328/1
thinking [2] 98/5 111/24
thinks [2] 158/1 317/2
third [13] 33/20 40/20 40/25 62/20
73/16 82/19 83/13 166/21 168/8 184/12
195/14 202/14 207/12
third-party [2] 82/19 168/8
this [621]
Thornburg [2] 1/19 2/14
thorough [2] 199/8 216/5
those [150] 4/1 4/4 4/13 4/14 9/11 9/14
9/16 10/9 10/10 11/10 14/4 15/23 16/17
25/1 26/15 29/9 29/13 30/14 31/5 31/14
32/1 32/2 32/7 32/11 33/3 33/4 33/5
33/5 33/14 33/16 35/15 36/17 36/19
37/11 37/13 39/13 40/3 51/9 52/3 54/20
56/3 56/6 56/20 56/22 59/4 73/4 73/6
73/6 73/15 75/4 81/4 82/2 83/18 83/21
84/22 86/8 90/17 90/21 91/3 93/14
93/20 96/13 111/1 120/24 122/17
122/20 125/21 131/3 131/18 131/21
132/8 135/17 135/19 138/19 142/7
144/21 145/18 145/22 150/2 158/23
162/7 167/3 167/17 170/15 174/18
179/1 179/3 179/5 179/24 180/17
181/17 182/8 183/3 183/20 184/1

184/14 184/23 185/23 191/4 193/24
193/25 196/10 203/1 204/23 209/21
215/25 217/24 218/16 219/6 220/9
231/18 231/21 232/11 237/1 237/4
237/11 241/14 246/23 251/15 254/2
254/16 258/9 259/6 266/12 267/16
267/19 267/19 274/21 280/14 280/20
281/11 282/8 287/4 287/20 294/9 297/8
299/6 304/4 308/13 308/15 309/12
309/18 310/24 311/1 322/14 325/15
325/25 326/7 326/11 327/21
though [13] 26/11 34/2 34/5 36/22
121/24 182/14 224/3 238/25 240/23
271/3 273/16 294/8 317/1
thought [17] 6/21 7/19 10/22 10/23
36/11 46/16 59/12 93/7 93/20 96/19
188/13 217/11 222/2 243/14 244/5
256/3 283/15
thoughts [1] 93/5
thousand [3] 3/24 95/21 115/14
thousands [1] 90/15
thread [2] 297/10 297/12
threads [1] 297/9
threat [8] 22/19 85/12 148/4 193/16
228/2 268/16 305/4 305/5
threatened [5] 85/3 148/20 148/21
238/15 297/2
threatening [2] 297/5 324/6
threats [10] 22/17 76/24 77/18 78/3
237/15 237/20 237/23 268/3 304/18
317/12
three [38] 9/14 20/21 53/7 53/12 53/16
53/18 57/15 75/15 76/2 76/7 87/2 87/6
89/8 123/3 135/10 182/1 200/2 201/14
212/19 215/16 215/18 219/2 219/10
221/11 242/17 242/18 252/1 252/2
290/18 290/20 296/11 296/21 304/10
308/15 310/21 311/22 324/22 325/9
three inches [3] 215/16 215/18 221/11
three-person [2] 310/21 311/22
threshold [1] 249/5
thrilled [1] 45/10
through [131] 3/22 4/1 4/10 5/4 6/9
12/14 16/22 17/25 20/1 32/5 33/8 40/17
40/18 73/12 79/10 79/11 79/19 79/25
80/2 81/2 81/5 81/15 81/15 82/13 88/16
89/15 89/16 90/22 91/15 94/3 97/4
103/7 111/3 111/11 112/20 112/23
115/7 118/7 122/7 132/5 132/9 134/15
135/20 136/6 138/24 138/25 139/17
141/13 142/7 143/1 144/5 144/9 144/16
144/21 151/24 152/22 156/5 156/13
156/20 156/25 157/6 157/15 158/14
159/11 159/16 160/24 164/9 167/7
173/25 178/16 182/5 187/10 187/14
187/16 188/6 190/11 191/5 191/25
192/1 192/9 193/22 194/1 194/22 196/3
199/11 205/10 206/21 208/8 208/10
209/12 218/19 219/24 224/21 225/22
229/21 232/24 236/3 240/14 241/20
242/6 246/4 248/13 251/22 254/7
254/18 255/8 257/24 258/21 258/22
258/23 262/24 265/10 268/12 274/21
282/4 285/5 285/18 292/11 292/22
303/7 304/8 305/8 309/10 310/24 311/6
312/8 316/12 316/23 321/21 322/13
322/23
throughout [3] 21/5 41/8 197/8
throwing [1] 225/18
thrown [1] 232/11

T
thumb [4] 34/18 210/23 211/1 328/10
time [15] 6/1 7/2 9/13 15/8 16/23
28/17 38/8 45/21 46/4 47/24 57/14 59/3
59/7 66/7 68/15 68/17 71/11 77/2 77/20
79/2 85/16 86/1 93/24 98/13 98/17
100/16 101/9 102/16 106/9 108/23
113/1 116/21 118/11 120/11 131/1
132/23 133/9 136/9 137/12 139/19
139/22 141/19 146/17 155/1 155/6
156/16 165/22 167/9 167/10 167/13
167/14 172/16 174/4 176/11 177/3
177/11 179/8 183/5 183/8 183/20 200/2
201/11 212/5 212/7 212/12 212/18
213/9 213/23 216/6 222/2 222/15 223/6
232/7 237/18 238/24 239/15 243/13
243/17 246/9 248/18 251/12 253/16
254/4 256/2 257/14 257/22 258/14
263/8 271/23 272/9 272/15 282/13
285/23 288/16 289/1 289/11 291/7
291/20 291/21 294/21 298/11 299/2
299/9 303/1 304/24 306/16 307/1 311/4
311/12 316/9 316/20 317/23 322/24
326/14 327/10
timeline [5] 130/7 143/18 172/10 194/3
194/8
timely [1] 222/14
times [15] 110/16 169/7 184/25 194/25
288/24 288/25 289/8 290/17 291/19
292/15 293/1 293/6 297/17 308/19
322/4
timing [3] 118/3 173/8 249/6
tipsy [3] 50/17 50/19 52/24
title [81] 4/20 5/23 9/1 19/5 19/23 21/3
22/5 23/9 28/7 30/22 33/19 34/12 40/13
41/1 41/25 43/5 57/7 69/25 69/25 70/8
70/9 70/16 70/22 70/24 71/17 72/5
72/10 72/19 72/22 73/8 74/1 80/8 82/9
82/16 87/9 98/6 109/3 109/12 109/25
114/25 121/24 121/25 122/1 122/3
124/9 124/12 124/13 136/8 136/13
138/2 138/9 138/12 138/15 139/11
144/21 149/13 149/20 170/5 170/8
173/16 178/15 185/18 190/18 191/21
192/7 194/16 194/20 201/1 203/20
206/14 206/24 207/10 217/15 217/16
218/1 219/7 230/7 240/10 309/21 310/2
315/14
Title IX [1] 124/12
titled [1] 101/4
today [43] 3/12 4/12 4/16 6/3 6/11 6/13
12/5 12/12 14/15 14/17 16/2 18/17
19/23 19/24 22/21 22/22 31/21 37/8
41/18 43/15 44/9 66/24 193/23 194/18
202/18 203/4 203/21 214/11 218/21
224/16 239/20 242/2 246/23 264/18
264/23 273/14 275/10 283/9 291/6
319/12 323/6 323/13 325/5
together [18] 4/11 26/12 89/16 123/2
183/1 227/12 227/13 228/4 228/19
242/20 243/3 244/13 247/18 249/11
258/14 265/25 312/25 326/3
told [24] 5/10 7/21 12/1 63/2 63/3 64/25
78/8 92/14 92/14 92/22 92/24 96/7
119/8 128/24 128/25 129/14 129/15
169/7 169/25 187/9 208/4 208/4 236/19
304/16
tolerated [1] 305/23
tomorrow [4] 5/2 5/6 5/8 11/20
too [13] 57/2 71/1 86/22 127/2 132/21

257/3 292/21 293/5 293/17 309/6
318/14 319/2 327/8
top [15] 42/13 47/17 51/19 54/23 55/5
56/18 116/20 182/7 182/11 194/14
219/12 246/5 246/22 257/22 289/7
top [23] 16/10 65/10 83/18 84/17 90/5
97/13 101/4 112/14 115/24 116/12
116/17 120/1 127/22 141/1 172/10
173/7 197/11 239/17 241/19 286/11
290/12 313/17 313/21
topic [3] 139/2 232/22 235/17
torn [1] 40/4
totality [1] 6/23
totally [2] 52/2 70/15
touch [4] 25/17 91/6 97/16 158/14
tough [3] 54/19 273/14 273/15
towards [4] 103/24 169/3 301/11
328/22
tracks [2] 203/16 295/14
tradition [1] 29/2
traditionally [1] 41/11
trained [3] 99/9 161/11 219/4
training [3] 89/10 138/2 219/8
trainings [3] 89/15 138/4 138/10
transcribed [1] 245/6
transcribing [3] 244/17 244/20 245/9
transcript [35] 1/6 1/24 14/22 15/13
16/11 19/1 24/4 24/9 24/17 24/20 25/7
230/12 238/18 239/19 240/17 265/6
265/8 270/16 272/10 272/18 272/24
274/22 292/21 293/2 293/5 299/18
300/1 301/25 302/9 302/24 303/6
303/12 318/6 329/10 329/13
transcription [1] 1/24
transferring [2] 25/4 272/22
transit [2] 8/5 8/6
transpired [3] 57/20 284/11 299/24
transpires [1] 168/25
traveling [1] 304/6
treat [3] 36/24 40/16 324/17
treated [7] 21/5 21/21 27/10 37/13
295/20 295/23 295/25
treating [1] 35/18
treatment [10] 19/25 21/3 22/2 34/17
34/20 41/11 43/6 80/13 212/13 309/17
trend [2] 270/1 270/2
trial [4] 12/2 12/2 306/19 328/24
trick [1] 105/2
tried [3] 173/17 317/18 317/23
tries [3] 125/24 157/11 312/13
triggered [1] 161/6
trip [1] 317/24
tripartite [14] 75/13 75/23 76/18 77/6
77/14 78/8 79/19 94/2 95/10 138/24
139/21 141/5 141/20 150/22
TRO [8] 1/6 12/12 12/18 12/21 13/13
16/2 20/22 25/5
TRO/PRELIMINARY [1] 1/6
troublesome [1] 27/20
truck [3] 168/15 168/18 257/21
true [22] 11/18 17/8 71/4 71/5 82/21
120/15 120/19 122/16 127/16 131/21
192/24 211/25 217/14 240/1 258/12
259/11 266/15 269/18 317/5 317/10
324/10 329/12
truthful [1] 119/9
truthfulness [1] 129/18
try [20] 19/22 23/16 73/20 73/25 81/2
81/19 90/21 90/25 98/12 102/8 102/20
123/18 125/10 143/19 150/4 192/6

234/22 248/23 250/15 292/16
trying [41] 5/4 11/21 13/21 16/19 19/16
49/22 81/13 85/6 92/25 94/11 98/4
98/23 102/22 102/24 105/2 105/3
111/18 113/17 114/21 118/16 127/25
131/12 154/22 170/6 178/14 196/2
205/21 205/23 211/22 215/14 234/1
237/15 241/7 247/10 250/7 256/22
260/23 271/6 273/18 313/7 313/14
Tuesday [10] 3/20 7/20 8/12 14/14 17/5
204/7 322/20 323/10 326/15 329/4
tuition [2] 14/20 232/6
turn [9] 40/3 51/2 139/8 145/19 158/14
206/9 241/6 241/23 325/8
turned [7] 105/8 206/20 260/22 291/2
291/4 301/16 318/12
turning [1] 269/22
turns [1] 267/7
two [136] 4/19 5/24 6/24 6/24 7/12 7/22
8/14 9/1 9/11 9/16 9/25 10/9 10/10
10/11 11/9 12/8 13/19 16/13 17/13 19/8
19/25 23/22 24/10 24/25 25/1 28/6
28/19 29/20 30/20 32/14 35/11 35/20
36/16 36/17 42/3 47/19 49/2 50/4 50/25
51/9 53/4 53/7 53/12 53/16 53/18 54/9
54/14 54/17 56/3 56/20 56/21 56/22
57/11 59/4 67/3 89/16 90/16 105/18
135/6 136/24 138/3 142/25 143/4
145/22 145/22 146/9 151/16 154/3
160/12 179/1 179/3 181/10 181/15
188/25 202/13 211/4 211/5 211/18
212/19 216/4 217/25 218/22 219/12
220/14 220/19 220/21 222/20 228/16
235/12 236/12 242/5 242/9 243/17
246/11 251/15 252/10 252/11 252/24
253/2 254/10 254/12 264/24 265/17
265/19 265/21 266/17 266/18 267/18
267/19 267/19 269/4 275/5 275/6
276/13 289/25 290/21 290/25 291/6
291/6 296/11 296/21 302/19 303/25
304/4 304/14 309/8 312/1 312/24
312/24 313/7 313/11 318/19 321/17
323/18 323/24 327/20
two-and-a-half [2] 211/18 291/6
two-fold [1] 154/3
two-minute [1] 50/4
two-page [1] 105/18
two-step [1] 19/8
two-to-three [1] 53/18
two-week [1] 11/9
type [16] 25/3 27/4 28/3 30/23 73/12
95/18 99/15 115/13 195/24 230/4 239/2
272/21 282/20 283/17 283/18 295/3
typed [2] 247/13 300/18
types [11] 87/8 138/21 149/10 157/23
186/1 203/24 211/13 254/5 258/9 277/2
307/25
typical [1] 163/7
typically [21] 74/10 96/4 100/11 114/11
124/8 125/22 142/17 155/23 161/24
190/24 191/4 191/5 196/6 196/9 197/7
216/7 226/16 230/9 236/6 289/4 301/10
typing [3] 244/17 245/14 246/13

U
U.S [1] 329/17
uh [26] 76/11 81/23 83/14 83/16 92/16
93/9 93/16 97/20 100/24 101/1 105/10
107/1 113/5 114/6 118/1 123/23 128/15
170/2 189/3 198/5 204/15 245/18

U
uh... [4] 248/15 295/6 302/18 308/22
uh-huh [26] 16/11 81/23 83/14 88/16
92/16 93/9 93/16 97/20 100/24 101/1
105/10 107/1 113/5 114/6 118/1 123/23
128/15 170/2 189/3 198/5 204/15
245/18 248/15 295/6 302/18 308/22
ultimate [1] 266/14
ultimately [7] 139/11 170/15 170/17
174/23 180/14 198/16 199/2
umbrella [2] 70/12 164/7
unable [1] 304/7
unanimous [1] 220/14
uncomfortable [2] 260/24 261/6
UND2033 [1] 91/24
UND647 [1] 100/25
under [44] 16/6 16/24 29/10 29/24
35/23 37/14 37/17 41/1 43/4 43/15
70/16 86/14 104/11 104/13 133/9 134/6
134/11 142/22 164/6 180/20 195/7
197/13 199/5 204/8 205/3 206/11 226/6
226/10 248/22 258/22 269/13 271/13
275/16 276/21 280/24 286/8 295/4
303/21 307/11 308/6 308/11 316/3
320/10 325/21
undergo [1] 38/11
undergraduate [4] 137/21 138/1 276/20
279/1
underline [1] 286/9
underlined [2] 286/13 287/4
underlying [7] 6/8 208/16 218/16 242/5
250/1 250/23 255/19
underscore [1] 211/22
understand [60] 8/18 13/10 13/21 18/16
23/21 25/9 30/2 31/23 35/19 36/9 39/19
40/20 44/23 46/14 57/8 67/12 71/6
72/24 78/13 81/19 85/5 85/25 90/2 90/4
91/9 132/17 146/5 150/7 150/19 154/8
163/7 173/3 173/24 174/12 177/11
180/22 185/21 186/20 186/22 191/23
199/20 209/11 212/20 213/25 213/25
234/6 236/5 239/12 256/23 268/7 279/6
283/3 289/22 294/3 296/18 300/16
303/25 305/2 305/6 320/17
understanding [26] 8/11 19/13 48/11
51/22 61/16 63/11 73/11 77/5 80/7
80/10 102/16 154/18 191/8 198/2
206/19 221/6 228/17 233/14 264/2
264/6 269/14 277/12 277/20 298/6
318/3 318/6
understands [2] 174/2 285/7
understood [6] 8/9 13/1 13/23 199/17
325/18 329/2
undertakes [1] 143/8
underway [1] 270/9
undo [1] 16/14
undone [1] 14/23
unequivocally [3] 28/14 220/17 246/18
unfair [1] 20/6
unfortunately [2] 64/25 66/1
unimportant [1] 35/18
unique [2] 17/9 85/7
UNITED [2] 1/1 1/7
universal [1] 27/3
universities [9] 39/5 39/16 42/7 42/8
185/9 269/18 269/21 272/12 282/19
universities' [1] 42/5
university [187] 1/5 1/23 2/4 2/15 2/17
2/18 9/2 15/18 16/21 16/22 17/5 17/14
17/17 17/21 17/25 18/7 18/12 20/8 21/4

21/23 22/7 22/10 22/16 22/25 24/14
25/1 25/2 25/23 27/8 27/22 28/11 29/2
29/4 29/10 29/12 30/3 33/1 38/2 33/18
33/22 34/3 35/17 36/16 36/18 36/22
37/21 37/24 38/17 38/23 39/3 39/11
39/20 40/6 40/10 40/16 41/19 42/15
42/17 42/21 43/1 43/13 52/11 55/17
61/19 62/3 62/11 67/11 67/15 67/22
70/1 70/19 71/16 72/20 77/1 77/10
77/12 77/22 77/25 78/5 78/10 78/23
78/23 79/10 79/20 79/22 82/10 82/13
82/14 91/5 91/23 93/11 93/17 94/4 95/4
97/25 99/21 101/10 103/8 109/25
117/24 121/25 131/19 136/10 136/11
137/22 137/25 138/18 141/21 142/1
144/19 145/12 145/14 145/20 146/5
149/1 149/11 154/9 154/22 164/20
166/2 166/5 166/5 166/25 176/16 180/9
181/1 181/2 181/23 182/11 184/22
185/13 190/6 190/14 190/15 191/16
192/18 199/12 201/7 201/11 202/21
211/25 212/8 213/21 217/16 218/2
218/8 226/10 231/5 231/9 232/9 232/11
233/17 233/21 234/6 263/2 263/7 263/9
265/2 265/5 265/22 266/13 270/12
270/15 270/19 270/22 270/23 271/3
272/8 272/15 276/20 277/8 279/1 279/3
280/4 281/9 281/20 283/2 294/4 305/19
306/16 306/23 307/8 309/15 309/23
312/3 315/14 315/15
University's [6] 40/23 42/19 42/24
166/22 207/13 224/1
University-wide [1] 42/21
unless [3] 218/24 235/2 259/23
unlike [2] 30/2 30/2
unnecessarily [1] 40/9
unquote [3] 207/21 266/5 283/17
unrelated [1] 170/8
unresponsive [1] 163/2
unsafe [2] 260/24 261/6
unseal [1] 327/15
unspoken [1] 58/7
until [14] 3/22 5/25 7/13 14/4 14/6
29/22 88/9 104/8 198/18 213/11 222/2
243/22 270/24 323/9
unusual [3] 2/8 114/15 190/13
unwelcome [1] 287/1
up [85] 3/8 5/12 6/11 7/13 10/5 12/3
12/17 20/22 21/19 21/20 22/6 22/21
24/24 27/14 29/22 43/23 48/7 48/21
50/1 65/8 71/24 79/11 90/1 105/2 106/5
108/11 108/19 110/5 129/6 131/12
132/22 132/22 134/20 136/5 137/9
144/19 147/24 150/4 167/1 181/14
182/9 182/23 192/6 198/12 200/3
200/12 202/9 210/19 218/21 219/18
226/11 232/8 233/18 237/13 237/21
238/9 238/11 238/24 239/4 239/24
240/24 241/14 243/9 247/2 247/9
247/13 248/13 249/20 260/23 262/23
262/24 270/22 271/23 274/23 275/10
278/20 283/11 284/24 294/11 299/2
299/10 299/13 308/12 326/23 327/15
update [1] 149/5
updated [1] 149/1
upholding [1] 282/6
upon [4] 15/4 17/15 18/21 322/21
upset [8] 48/4 49/1 49/12 49/20 57/19
108/2 128/8 212/14
urge [1] 166/17

us [68] 3/20 4/5 4/14 6/16 6/21 7/21
8/25 10/21 14/15 17/6 19/19 21/14
22/20 23/18 47/8 47/19 48/21 59/6
59/24 60/3 62/22 65/13 66/23 70/22
86/15 89/13 95/5 111/15 112/5 112/16
113/15 115/17 116/24 119/13 120/2
120/23 121/12 123/12 128/2 128/20
149/9 158/13 168/24 180/15 187/9
201/10 214/4 214/11 215/10 216/1
219/2 219/10 235/10 246/3 253/21
258/25 259/24 260/8 265/11 265/14
298/9 298/20 301/17 307/11 309/13
315/8 323/12 328/1
use [27] 32/4 39/5 41/16 44/8 51/19
74/20 74/21 78/4 79/8 94/11 110/11
110/13 111/22 111/23 112/3 196/6
197/2 198/20 207/22 211/17 211/21
221/16 231/1 242/2 245/11 273/24
287/12
used [11] 55/11 59/18 80/25 95/17
100/15 103/3 210/24 237/14 237/19
242/1 277/23
using [11] 4/24 41/21 44/23 47/1 61/17
110/18 237/23 259/15 270/2 270/4
270/5
usual [1] 147/11
usually [1] 73/20
utilize [1] 89/8
utilized [1] 138/20

V
vaguely [1] 141/16
validity [1] 88/25
Valley [1] 137/24
values [1] 145/15
vandalism [2] 219/5 228/3
Vanderbilt [1] 282/20
variety [3] 30/12 174/12 279/15
various [4] 210/9 215/4 277/22 279/18
vary [1] 125/4
VAWA [1] 219/7
vehicle [3] 169/2 169/3 169/8
venue [1] 239/21
verbally [1] 266/23
verbatim [1] 293/16
verify [3] 246/6 293/2 299/13
Vermont [1] 138/18
versa [1] 16/6
version [4] 104/21 104/22 203/13
204/10
versus [7] 2/4 21/1 26/22 35/9 89/21
305/1 311/7
very [88] 3/19 4/15 7/2 7/5 10/1 10/1
10/4 10/4 10/6 13/14 14/9 14/17 17/2
17/9 18/18 20/18 22/3 25/9 27/17 28/5
28/9 30/3 32/24 33/3 38/23 39/5 39/17
39/25 40/7 41/25 42/2 42/5 42/11 48/4
48/4 50/13 57/4 72/22 75/8 81/12 85/22
95/8 115/10 116/17 138/22 141/16
185/22 192/12 196/25 198/13 201/10
208/13 211/24 212/7 212/11 212/14
212/14 219/20 221/3 224/12 225/7
226/24 230/12 232/4 232/12 232/12
232/22 235/10 237/4 240/18 241/3
241/24 249/7 253/2 255/3 261/6 273/10
273/16 273/19 282/7 297/14 299/13
300/25 305/18 312/17 312/18 316/4
327/8
via [5] 153/1 157/24 197/22 197/24
285/4

<p>V vice [11] 16/6 76/3 76/4 76/6 94/12 149/16 149/18 257/1 270/19 279/19 280/1 victim [6] 235/9 300/24 301/8 301/9 301/14 301/18 victim-blaming [3] 235/9 300/24 301/14 victims [1] 230/8 video [43] 10/5 46/13 46/16 47/16 50/16 51/9 51/9 51/18 52/14 53/22 54/12 54/13 54/14 54/17 54/22 54/25 55/5 55/8 55/13 55/19 55/23 55/25 56/16 56/17 56/24 57/11 57/19 58/4 168/17 168/20 168/25 169/1 169/9 169/14 171/13 181/10 255/25 259/11 275/10 323/23 324/2 327/20 327/20 videos [22] 4/6 46/12 46/17 50/11 51/7 51/12 51/21 52/14 53/2 53/6 56/21 146/4 178/23 179/1 179/3 179/19 179/24 180/4 254/13 254/14 259/4 259/6 videotape [5] 6/1 45/22 45/24 49/25 68/21 videotapes [2] 54/1 254/10 videotaping [2] 178/25 323/24 view [7] 9/16 9/22 38/13 49/6 49/15 172/6 232/11 viewing [1] 12/18 viewings [1] 184/20 views [1] 220/21 vindictive [1] 281/5 violate [2] 240/5 255/21 violated [11] 29/14 38/4 38/5 62/15 67/22 216/11 233/10 233/22 269/24 308/25 314/18 violates [2] 91/7 231/8 violating [4] 170/23 257/16 258/1 259/17 violation [38] 43/9 67/17 75/4 79/15 84/21 87/15 88/4 99/25 107/11 139/16 141/18 166/22 175/17 176/2 190/23 197/17 208/20 220/8 228/2 229/2 229/4 229/6 229/9 229/16 240/22 244/23 257/17 258/5 258/19 262/9 262/14 267/21 267/25 269/2 287/15 304/20 308/14 321/6 violations [14] 27/19 33/6 118/6 170/14 181/15 197/22 208/13 208/17 218/15 219/5 228/9 266/12 308/11 308/20 violence [38] 22/17 22/18 22/19 22/19 70/13 70/14 76/24 78/2 78/3 78/3 78/3 84/13 84/13 91/14 91/14 147/23 148/2 148/3 148/3 148/4 161/6 166/24 167/6 176/9 193/11 193/15 193/16 193/16 207/15 268/3 268/4 268/14 268/16 276/22 286/24 304/18 309/9 313/19 violent [4] 255/22 318/18 318/20 318/24 virtually [1] 285/6 vis [2] 30/20 30/20 vis-a-vis [1] 30/20 visit [1] 246/14 visitation [1] 219/5 visitors [1] 283/2 visual [2] 210/17 210/22 voice [1] 219/21 volume [1] 93/1 voluminous [5] 32/3 32/4 175/6 210/4 210/11 vote [6] 220/15 220/15 220/16 246/25</p>	<p>247/1 247/6 vulnerable [1] 107/2 W wait [7] 10/11 14/6 18/9 76/19 78/9 87/23 213/11 waited [1] 298/25 waiting [5] 18/21 62/19 262/3 273/6 273/11 waived [1] 224/23 wake [2] 266/3 299/12 walk [9] 50/5 62/22 63/18 141/13 156/5 223/4 246/1 270/11 285/5 walked [5] 47/23 63/6 63/21 262/4 298/25 walking [4] 50/6 50/9 102/18 259/12 want [112] 2/12 6/16 8/20 8/21 11/3 12/17 13/9 13/12 14/11 14/18 16/16 20/22 23/20 39/23 43/25 48/12 60/23 61/1 63/23 68/14 68/21 69/3 71/1 74/6 74/22 75/10 79/13 80/5 80/20 81/8 81/10 83/4 84/24 85/25 87/13 88/11 90/9 94/9 95/8 95/12 97/4 102/20 118/25 119/5 122/4 123/20 125/14 126/1 128/22 128/25 130/2 139/19 142/23 145/15 156/6 163/20 169/4 170/13 196/15 199/7 204/3 205/8 205/11 206/9 207/6 211/25 214/1 216/19 218/6 221/16 221/22 223/21 224/22 228/7 230/13 231/1 232/19 233/7 233/23 234/7 241/21 241/23 247/10 250/13 250/16 250/18 252/12 263/4 266/9 267/9 270/8 273/19 275/16 278/23 281/9 288/5 288/17 293/3 299/2 299/18 299/23 305/16 305/17 310/25 314/14 315/10 315/20 319/10 322/12 325/8 326/23 328/10 wanted [28] 2/6 5/16 7/5 8/1 8/24 13/2 20/21 43/9 43/11 50/15 51/5 54/7 61/3 76/19 85/16 85/18 93/2 112/21 112/22 150/17 150/18 176/15 180/12 187/7 241/14 263/17 298/21 316/6 wanting [2] 254/11 256/13 wants [8] 150/25 155/16 169/5 199/12 241/14 242/8 256/25 302/2 was [596] was on [1] 141/22 wasn't [35] 23/12 43/8 51/6 59/18 99/5 103/14 123/6 129/15 170/5 187/21 193/1 194/16 194/17 195/5 213/21 235/16 236/12 237/13 243/22 251/11 257/14 261/17 267/8 268/4 268/5 271/10 271/15 271/15 298/22 316/14 317/13 317/20 318/1 325/5 327/24 watch [1] 171/11 watched [2] 51/9 323/23 way [83] 2/7 3/4 4/2 5/4 5/18 6/19 7/2 8/8 8/14 10/11 13/7 16/19 16/24 17/18 21/20 32/22 37/3 37/13 40/16 40/17 40/18 43/23 47/20 50/17 55/7 58/10 59/8 63/21 65/2 68/20 81/15 82/9 82/10 83/23 90/12 97/23 99/9 102/1 102/9 118/21 138/25 144/17 145/25 183/21 183/23 184/1 185/25 191/24 192/8 194/4 198/20 205/8 205/10 212/23 213/9 219/17 219/17 224/22 224/25 226/8 227/14 227/16 229/3 229/6 233/8 240/2 240/4 241/1 247/11 256/4 257/18 258/3 258/6 258/21 262/8 262/11 284/5 291/25 296/2 307/24 320/4 322/21</p>	<p>327/16 ways [14] 39/4 39/7 41/17 73/12 73/14 75/18 74/15 79/4 89/15 90/17 94/4 139/3 144/15 154/9 we [731] we'll [24] 14/4 14/5 14/5 15/22 33/8 43/7 48/24 60/25 69/2 125/23 132/22 132/23 134/10 134/10 142/11 200/13 278/7 282/21 294/15 298/1 300/23 325/9 328/9 328/12 we're [68] 2/3 4/23 10/9 10/11 10/14 16/15 17/6 19/22 19/24 20/2 20/5 22/22 24/11 24/23 26/17 36/23 36/24 37/8 38/14 38/15 40/9 40/10 40/20 40/22 40/24 41/25 43/3 43/4 43/16 44/7 45/5 50/11 83/12 90/9 106/16 118/16 134/15 136/6 158/1 177/2 179/8 190/20 203/4 204/24 208/1 214/12 215/6 215/7 220/7 226/6 233/5 234/1 248/25 255/18 268/12 269/23 269/24 273/2 273/22 278/19 282/12 285/9 289/6 297/14 302/24 306/15 310/24 327/14 we've [29] 4/11 6/1 17/8 20/4 28/24 40/6 41/7 54/15 84/14 91/17 106/11 106/12 118/17 139/7 145/22 151/15 164/25 179/25 202/9 209/12 211/16 223/13 264/18 266/17 282/7 284/25 288/19 293/8 300/1 wealthy [3] 29/8 186/1 310/9 weapon [1] 78/4 weapons [1] 76/25 web [3] 72/1 203/15 280/18 website [2] 203/15 286/9 Wednesday [1] 3/21 weeds [1] 309/6 week [11] 11/8 11/9 12/2 12/8 12/10 15/20 101/19 152/7 328/22 328/24 329/4 weekend [4] 66/2 119/22 144/16 182/7 weekly [1] 268/12 weeks [3] 194/14 194/14 254/12 weight [2] 219/21 311/25 welcome [1] 144/16 well [81] 4/17 7/19 7/23 8/7 11/15 13/13 15/7 17/6 20/12 27/11 32/11 70/25 74/7 78/14 84/8 89/25 95/1 103/25 107/24 111/12 111/20 117/15 117/16 119/19 124/16 127/16 130/9 130/22 130/23 131/10 135/4 135/16 137/7 138/8 138/11 144/20 149/20 149/20 164/1 165/10 189/8 199/11 201/23 202/4 205/8 206/23 211/2 211/5 219/1 233/16 236/14 239/19 248/4 248/16 249/8 252/3 253/7 253/18 253/20 254/3 255/4 262/1 266/16 267/13 273/16 275/9 277/19 279/23 283/25 284/19 286/22 287/25 290/14 293/10 294/3 298/8 301/12 315/20 316/9 322/1 323/7 well-accepted [1] 236/14 well-being [1] 286/22 went [23] 3/22 21/19 25/4 62/24 63/1 63/2 63/14 130/3 142/6 156/12 187/10 187/14 215/23 216/24 227/11 227/13 239/5 249/11 254/2 262/4 270/6 276/2 297/17 were [207] 2/1 3/1 4/1 4/2 4/3 4/4 4/6 4/18 4/22 5/11 6/3 7/21 7/22 8/10 8/12 9/7 9/13 11/20 12/9 13/3 14/23 17/4 20/21 23/10 23/17 30/20 31/7 36/14</p>
---	---	--

W
 were... [179] 40/23 42/25 44/2 46/16
 46/7 47/1 47/6 47/12 47/19 47/24 48/1
 48/12 49/25 50/6 50/6 50/9 51/7 52/13
 52/14 52/17 53/1 53/5 53/8 53/13 53/17
 53/23 54/2 54/19 56/3 56/7 57/19 58/2
 59/5 59/14 62/10 62/19 62/20 63/4
 64/17 66/22 69/6 76/7 77/18 77/19 79/1
 85/13 86/7 87/10 95/4 96/8 96/22 96/24
 98/22 98/23 100/19 102/22 105/16
 111/18 113/9 113/17 114/22 117/7
 120/25 122/10 127/25 129/17 130/3
 132/10 133/1 133/6 135/21 136/13
 137/1 137/11 137/15 137/16 146/4
 146/9 148/9 150/16 152/18 152/25
 161/1 161/7 170/15 170/21 170/22
 174/18 174/20 174/20 176/9 178/14
 181/15 183/2 192/24 193/24 197/1
 197/9 200/5 204/8 210/5 210/24 213/13
 215/10 215/24 217/7 217/11 221/12
 221/12 222/3 223/7 225/23 227/15
 234/25 235/5 236/19 237/1 237/2 237/3
 237/4 241/2 241/17 242/8 245/23
 249/13 250/7 251/22 251/24 252/10
 252/11 252/24 252/25 253/2 253/10
 254/10 254/13 254/14 254/14 254/20
 255/20 255/23 256/5 257/22 258/1
 259/19 262/1 265/19 265/24 266/6
 266/16 271/2 271/11 274/2 274/25
 277/25 278/5 279/6 284/10 285/8
 288/10 290/5 290/6 291/2 303/13
 303/25 304/4 304/17 308/25 309/14
 309/18 311/21 314/7 315/22 316/11
 319/14 319/16 323/11 326/20 328/2
 weren't [12] 18/6 18/7 46/15 173/4
 227/5 235/24 256/12 305/15 318/1
 318/10 318/10 318/13
 West [1] 1/12
 what [393]
 what's [45] 42/2 91/22 94/25 102/10
 106/17 107/17 108/8 110/2 119/12
 133/16 145/8 145/13 146/25 148/15
 149/21 151/9 164/1 164/19 165/7 168/5
 173/11 177/24 177/25 178/8 203/8
 207/6 207/22 216/19 219/23 241/4
 245/10 245/21 253/5 254/23 283/7
 285/7 285/13 293/24 296/3 299/25
 301/24 302/9 303/3 315/3 315/5
 whatever [11] 13/19 14/7 17/17 35/24
 221/16 222/4 223/1 224/14 233/20
 247/10 276/25
 whatnot [8] 100/7 118/5 137/7 143/20
 209/10 210/9 211/8 317/7
 when [165] 5/12 5/15 11/9 11/9 11/9
 14/21 16/10 17/4 20/16 22/4 24/18 25/2
 26/17 27/19 32/17 33/4 34/9 35/20 36/7
 38/14 38/15 43/25 45/21 45/24 51/25
 53/20 53/23 55/21 58/13 62/17 63/21
 64/1 65/23 67/4 71/15 71/20 74/19 77/9
 79/11 85/10 86/5 86/9 87/1 87/25 90/9
 90/13 90/20 92/13 94/1 96/11 98/7
 99/19 100/16 101/25 102/7 110/9
 111/20 111/23 117/22 118/3 119/5
 120/9 130/14 133/17 137/8 137/16
 138/15 139/10 139/11 139/13 144/13
 144/20 150/19 156/5 157/18 160/16
 161/7 169/13 169/14 169/19 172/9
 177/21 178/19 179/6 179/21 188/4
 189/12 193/20 197/5 197/21 202/9
 204/7 205/5 206/19 208/3 208/4 210/17

212/14 213/10 213/13 214/9 215/3
 215/6 217/16 219/11 220/7 221/19
 223/7 224/20 225/21 227/1 227/12
 228/1 228/17 228/19 228/22 231/1
 231/5 231/19 233/9 240/17 240/23
 241/23 245/8 245/22 247/13 254/13
 256/5 257/6 258/25 259/17 259/18
 260/7 260/17 261/4 261/15 262/9
 264/24 265/21 266/22 267/15 267/25
 269/20 284/22 285/10 285/20 288/25
 290/3 290/5 290/16 291/20 296/23
 297/1 297/15 299/2 304/25 312/5 313/8
 317/20 317/25 318/4 318/12 320/5
 326/25 327/23
 whenever [2] 226/14 288/13
 where [121] 9/8 12/21 17/9 22/14 23/8
 23/10 24/7 32/12 32/24 33/1 35/21 39/6
 42/1 47/12 47/21 47/22 48/24 49/9
 49/22 50/11 52/22 52/23 53/23 54/1
 59/23 74/25 75/7 78/15 85/7 86/20
 86/22 90/8 90/13 91/18 94/15 105/16
 118/8 119/4 121/20 127/9 129/6 133/5
 137/5 140/24 143/18 144/6 144/25
 157/9 162/22 167/17 168/7 172/16
 173/7 183/2 183/8 186/19 195/8 207/12
 207/25 210/20 211/7 211/7 213/19
 224/12 224/18 228/4 228/8 232/21
 232/23 233/1 233/5 233/19 235/10
 236/25 239/19 239/19 239/21 245/20
 245/24 246/22 247/17 248/7 248/10
 251/17 256/25 262/2 267/2 267/21
 268/4 270/13 272/13 272/13 272/14
 279/25 281/6 282/3 283/6 286/4 297/5
 299/7 299/17 301/10 302/1 302/10
 302/16 302/21 302/25 304/21 304/21
 304/24 307/18 309/9 309/9 309/20
 313/2 313/12 313/15 315/11 316/24
 317/24 318/17
 whereby [2] 13/16 91/5
 whether [92] 11/19 12/17 13/12 25/25
 28/15 28/20 29/5 29/6 29/7 29/8 33/23
 33/24 33/24 33/25 33/25 34/1 34/9
 34/11 34/12 37/17 38/1 38/25 40/23
 46/4 58/6 58/9 58/16 58/21 59/8 59/11
 71/20 73/1 73/23 79/12 79/20 88/5
 99/14 99/15 99/18 100/2 100/13 113/8
 113/12 119/24 124/17 136/17 139/16
 150/20 150/21 159/3 159/6 159/19
 161/22 170/14 172/11 172/24 175/25
 176/4 180/18 184/11 185/15 185/16
 185/16 186/1 192/3 199/18 202/24
 219/15 220/7 221/10 224/22 227/17
 228/7 234/24 240/19 249/12 249/23
 257/7 260/4 264/8 279/16 282/19
 284/13 292/23 299/21 302/10 302/16
 302/25 306/13 310/8 310/11 310/14
 which [96] 8/17 8/20 12/3 14/19 14/19
 14/23 15/12 17/22 17/25 19/9 20/8
 21/19 22/6 22/18 22/22 29/23 37/24
 38/18 40/13 42/5 42/9 42/22 43/10
 43/15 47/17 47/18 56/8 56/12 56/16
 58/20 62/14 74/9 85/2 91/4 91/9 93/14
 96/7 104/6 105/13 110/6 110/16 125/15
 138/5 140/8 141/25 144/17 145/10
 147/1 154/3 154/9 160/11 163/4 181/14
 182/5 183/23 199/19 202/9 202/17
 202/17 203/4 207/1 214/19 216/13
 220/1 222/3 222/15 224/13 225/7
 231/16 235/19 236/14 238/24 241/5
 243/25 250/9 251/2 251/4 251/11

252/23 254/10 263/5 275/15 287/23
 296/21 300/19 305/7 309/4 310/3
 316/11 318/23 321/4 321/20 324/7
 325/6 325/10 325/14
 while [14] 17/20 118/25 132/4 137/14
 137/15 161/7 204/17 207/16 208/12
 213/12 223/24 231/12 273/22 326/3
 whisper [1] 82/21
 whispering [1] 231/15
 who [142] 2/11 3/9 4/19 4/19 4/22 5/10
 5/23 5/24 6/1 8/9 17/9 20/16 27/9 32/21
 34/23 34/24 36/19 38/11 41/12 45/3
 46/16 47/5 51/12 55/21 56/3 56/6 56/16
 58/9 58/13 58/21 59/23 65/15 70/10
 70/20 72/7 73/6 73/16 74/22 75/15 76/1
 80/18 90/6 90/6 90/7 93/22 97/24 98/5
 99/14 99/23 108/25 112/4 117/3 117/9
 119/5 122/17 122/19 122/20 122/22
 125/2 128/16 128/22 130/12 130/13
 130/13 137/1 137/6 148/4 148/4 149/17
 153/13 156/15 161/10 161/19 162/20
 167/23 177/16 178/25 182/19 186/17
 186/18 196/13 202/14 208/24 211/24
 212/3 212/5 212/12 213/7 213/24 214/2
 214/4 214/5 215/25 216/16 217/10
 219/2 219/4 219/13 219/25 220/19
 225/9 225/25 226/15 229/19 230/17
 232/2 233/25 244/15 249/18 251/15
 251/19 251/19 251/21 251/22 251/24
 251/25 256/6 259/15 260/3 260/3 260/6
 264/12 265/3 265/12 265/21 267/11
 276/20 277/8 279/16 281/7 283/16
 284/12 288/1 291/1 297/7 298/22 300/6
 304/1 310/3 311/19 313/2 318/1
 who's [6] 18/19 72/23 139/14 207/18
 245/3 304/16
 whoever [1] 233/3
 whole [7] 5/22 39/8 39/15 68/23 87/25
 163/20 224/9
 whom [1] 324/1
 whose [4] 46/22 51/24 55/22 56/7
 why [72] 3/11 8/20 14/2 17/10 26/20
 26/20 26/25 35/8 40/24 47/4 48/9 48/16
 53/18 56/21 64/19 68/16 84/24 85/15
 88/14 100/5 101/4 109/3 110/16 119/10
 123/9 125/10 130/10 132/15 132/22
 134/5 147/4 154/18 190/2 191/2 199/3
 199/9 200/1 211/21 219/9 220/10 221/2
 226/12 227/3 229/13 229/14 231/2
 231/22 232/14 233/7 233/8 233/10
 234/7 235/10 242/16 243/12 257/2
 258/24 258/25 272/23 275/7 281/10
 281/24 290/20 301/20 304/11 306/9
 306/24 306/24 307/14 318/22 322/19
 323/5
 wide [1] 42/21
 will [86] 3/9 5/1 5/8 5/14 5/24 6/1 7/8
 7/23 10/7 11/7 12/12 13/14 13/15 14/5
 15/16 15/23 16/7 18/7 25/1 29/11 29/19
 30/2 30/18 30/25 32/6 34/2 34/5 36/2
 37/16 38/23 39/13 50/16 66/1 66/2
 88/12 127/9 134/7 134/11 135/23 139/8
 139/17 142/17 149/15 152/21 162/7
 164/13 167/22 199/9 199/13 200/3
 202/14 220/16 231/12 231/13 231/19
 234/13 234/16 236/24 243/10 244/18
 244/19 247/9 248/4 249/8 260/13
 265/10 274/19 276/10 282/21 283/20
 286/3 286/7 287/10 287/12 288/1
 289/14 292/3 294/21 304/22 304/23

W
 will... [6] 312/18 320/10 320/25 325/18
 326/22 329/3
 Will you [1] 127/9
 Willerton [42] 4/18 5/1 5/8 5/14 5/22
 7/11 29/19 36/3 87/5 121/18 176/19
 181/8 186/16 200/11 200/12 200/19
 200/22 201/3 208/8 252/9 272/8 275/4
 275/14 277/23 278/11 278/17 279/6
 280/21 281/20 285/10 288/20 289/22
 291/11 299/18 301/24 303/25 310/20
 312/21 315/5 319/10 320/3 330/12
 Willerton's [1] 29/24
 willful [1] 146/14
 Willfull [1] 286/21
 William [3] 128/14 152/9 152/9
 willing [3] 40/7 321/19 323/3
 wipe [1] 214/3
 wish [4] 10/15 10/21 10/22 141/19
 wished [2] 87/16 235/7
 wishes [1] 79/17
 withdraw [2] 270/11 270/13
 withheld [1] 271/25
 within [25] 22/2 31/7 31/14 33/23 36/16
 36/18 43/3 72/13 72/18 76/2 96/5
 103/14 145/17 164/8 182/24 185/24
 202/2 203/3 204/14 262/21 276/3
 280/16 281/5 283/12 283/18
 without [11] 15/22 40/15 44/23 57/1
 62/22 177/24 182/14 211/17 212/11
 255/2 309/6
 witness [55] 7/11 45/13 64/14 65/20
 68/15 68/16 69/10 69/20 125/7 128/22
 130/12 131/14 132/18 132/23 133/6
 135/16 135/23 143/11 143/12 143/24
 151/12 151/16 162/4 175/3 200/9
 200/19 206/23 210/25 215/8 218/5
 225/4 225/7 254/21 274/12 278/1 288/1
 294/17 295/8 295/10 295/17 295/21
 296/8 297/7 297/13 297/15 297/22
 301/5 302/11 305/11 311/22 317/18
 318/10 318/15 323/23 325/11
 witness's [1] 325/5
 witnesses [67] 6/6 6/24 7/23 8/17 9/11
 9/16 10/1 10/2 10/12 30/8 31/4 36/16
 36/17 36/19 117/3 117/9 125/18 125/25
 143/5 157/25 160/22 174/13 178/10
 178/13 181/16 181/25 182/19 190/23
 190/23 209/9 209/20 216/17 219/22
 219/25 220/1 224/1 225/7 225/8 236/24
 254/17 254/19 274/13 274/16 284/10
 284/12 292/19 292/24 294/14 294/19
 294/21 294/25 295/4 295/21 296/1
 299/8 303/25 304/4 311/13 311/19
 317/7 317/11 317/23 318/10 318/14
 321/14 321/17 330/1
 wobbly [1] 266/18
 woman [24] 33/24 52/14 53/6 53/10
 55/8 58/4 80/19 178/24 186/7 229/23
 309/24 309/25 309/25 310/1 310/1
 312/25 313/3 313/3 313/5 313/6 313/12
 313/16 313/16 324/4
 women [14] 34/9 38/1 57/11 89/20
 89/21 89/23 89/24 183/15 295/25 309/4
 309/18 310/6 312/24 313/11
 won't [2] 191/1 249/6
 wondering [1] 130/18
 word [10] 111/23 189/13 221/16 233/2
 245/10 255/2 255/2 285/6 285/6 292/14
 words [3] 33/13 41/16 110/18

work [33] 18/22 18/23 70/21 72/18
 72/22 74/1 76/12 79/19 86/14 87/9 89/7
 90/9 109/12 112/4 125/23 125/25
 137/7 138/1 184/1 184/22 192/10
 192/12 202/19 205/6 211/16 219/4
 223/3 240/10 244/18 269/24 278/8
 328/12 328/15
 worked [7] 89/13 136/17 136/25 137/3
 222/13 236/11 248/15
 working [17] 22/22 116/19 126/14
 137/1 137/5 137/6 138/15 170/6 201/15
 201/20 201/23 244/19 244/21 244/23
 268/12 283/7 316/24
 works [8] 70/22 70/25 82/10 82/11 94/4
 98/1 202/22 283/4
 worn [1] 301/13
 worry [2] 128/24 300/21
 worst [1] 50/5
 worth [1] 324/15
 would [338]
 wouldn't [31] 7/13 12/13 18/8 65/1 80/2
 84/16 94/23 96/3 99/13 99/17 99/19
 99/20 121/23 185/22 191/11 209/22
 214/16 225/6 226/3 238/8 242/22
 255/17 261/7 261/23 264/14 265/22
 293/3 297/9 301/16 305/5 318/7
 wound [1] 247/9
 wrapped [1] 271/23
 wrinkle [1] 11/3
 writ [1] 83/24
 write [2] 144/1 326/25
 writing [6] 102/14 135/4 207/18 292/13
 292/18 298/7
 written [5] 192/1 223/25 255/7 277/13
 298/11
 wrong [4] 22/10 22/12 22/16 105/13
 wrote [3] 4/24 4/25 110/9

Y
 yeah [38] 10/3 10/21 18/16 46/23 47/13
 50/23 68/23 90/19 100/22 103/15 106/2
 109/10 114/4 129/6 130/22 130/23
 169/10 170/10 171/9 187/4 196/9
 197/11 204/22 205/25 216/22 218/11
 232/19 244/2 252/12 252/13 271/10
 277/10 280/24 286/8 289/14 293/23
 314/22 325/2
 year [22] 18/10 22/24 45/1 45/1 61/20
 61/21 61/25 83/7 90/15 90/15 144/14
 147/6 149/23 149/25 184/25 197/8
 203/12 211/18 225/25 232/10 262/21
 285/9
 years [17] 89/14 89/22 126/10 126/15
 126/18 136/12 136/19 136/25 138/3
 138/3 191/16 201/6 201/7 201/9 201/14
 283/12 296/11
 yep [13] 88/19 91/20 97/23 115/2
 137/14 165/12 203/6 263/3 291/15
 292/10 296/7 302/5 306/13
 yes [452]
 yesterday [14] 4/5 4/9 4/25 5/7 6/22
 7/12 7/17 7/25 11/14 12/1 32/1 315/8
 316/5 322/10
 yet [8] 46/5 164/4 199/7 233/19 264/20
 264/21 314/4 324/18
 York [4] 21/19 21/25 22/1 318/11
 you [1463]
 You'd [1] 89/1
 you'll [2] 16/23 125/7
 you're [16] 3/12 26/21 72/2 82/8 86/9

90/4 90/14 108/4 111/24 172/24 210/10
 259/18 269/1 273/10 273/22 276/18
 288/22 229/17 249/4 259/14 264/24
 267/24 272/8 297/21 320/14
 young [4] 32/3 32/3 43/22 44/11
 younger [1] 225/24
 your [357]
 yours [2] 56/1 255/6
 yourself [7] 44/24 48/10 48/10 54/2
 61/17 74/2 98/16

Z
 zoom [2] 140/13 140/13