

# **Exhibit 10**

# Deposition Transcript

Case Number: 2:24-cv-01043-DJC-DMC

Date: November 4, 2025

In the matter of:

STOCK v BOARD OF TRUSTEES OF THE STATE UNIVERSITY, et al.

David Andrew Daley

**CERTIFIED  
COPY**

Reported by:  
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1 Q. Do you see that?

2 A. Yes, I do.

3 Q. Any reason that you thought she was going to  
4 play the race card at this point?

5 A. Because that was an expectation that you  
6 alluded to earlier that -- and I don't know,  
7 but that was an assumption and it was going  
8 around.

9 Q. When --

10 A. And people wouldn't care if she was green with  
11 horns.

12 Q. I'm sorry. When you say it was an expectation  
13 that was going around, what do you mean?

14 A. I think the ag community were assuming that it  
15 was going to move in that direction rather than  
16 the fact that she wasn't doing a good job in  
17 her role, and as I said people wouldn't care if  
18 she was green with horns. They really  
19 wouldn't.

20 Q. And you say there was an expectation in the  
21 community that it was going to move in that  
22 direction?

23 A. I'm -- based on the feedback I got and whether  
24 that were people just guessing or not guessing,  
25 but they were frustrated.

1 Q. So are you saying that prior to this text you  
2 had had conversations with folks in the  
3 community where they expressed their concern  
4 that Dean Stock was going to play the race  
5 card?

6 A. This all moves in -- it's really hard for me to  
7 say dates before, after, exactly when what  
8 happened. But it is a large community, but  
9 they talk a lot among themselves. And so I was  
10 getting that kind of feedback. I can not tell  
11 you when exactly, but that's what the  
12 expectation was.

13 Q. Got you. So there was -- you received feedback  
14 from a large number of community members  
15 suggesting that they felt that --

16 A. I didn't say large.

17 Q. -- Dean Stock was going to play the race card?

18 A. I didn't say a large number.

19 Q. How many do you think?

20 A. I don't know. I can't tell you. But again  
21 this tends to morph into this extended period  
22 of time where it's hard to say who exactly  
23 called you and who said what.

24 Q. Either way you recall there was a sense in the  
25 community that Dean Stock was going to, quote,

1 unquote, play the race card?

2 A. And -- yes, and there was frustration, because  
3 it was about how she treated people and how she  
4 acted as a Dean or didn't and how she was  
5 unwilling to listen.

6 Q. But at this you're not aware of Dean Stock  
7 giving any indication that she believed that  
8 they -- conduct was motivated by race prior to  
9 that general understanding of the community;  
10 right?

11 A. I don't know. No, I don't.

12 Q. So there was an assumption in the community  
13 that Dean Stock was going to respond to this by  
14 playing the race card, is that fair?

15 A. Yes.

16 Q. You think it displays prejudice to assume that  
17 a minority is going to respond to criticism by,  
18 quote, unquote, playing to race card?

19 MR. NORTON: Objection. Calls for  
20 speculation, lacks foundation, and is  
21 argumentative.

22 Go ahead.

23 BY MR. KING:

24 A. I'm not even sure how to answer that. I -- you  
25 know, people have their own beliefs and their

CERTIFICATE OF REPORTER

I, the undersigned, a Registered Professional Reporter, Licensed by the State of Pennsylvania, being empowered to administer oaths and affirmations do hereby certify:

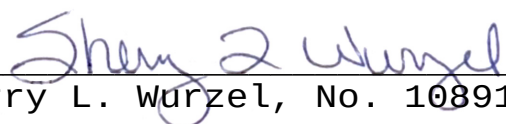
That the foregoing proceedings were taken before me at the time and place herein set forth; that any witness in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney or any of the parties.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [ ] was [x] was not requested.

IN WITNESS WHEREOF, I have this date subscribed my name.

DATED: Nov. 17, 2025

  
Sherry L. Wurzel, No. 1089165