

Exhibit 16

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SUSANA PATRICIA STOCK, an)
individual,)
Plaintiff,) CASE NO.
vs.) 2:24-cv-01043-DJC-DMC

BOARD OF TRUSTEES OF THE STATE)
UNIVERSITY, a State agency,)
et al.,)
Defendants.)
_____)

VIDEOTAPED ZOOM DEPOSITION OF SHERYL WOODWARD

WEDNESDAY, APRIL 30, 2025

Reported by: Shelley Lynn Schniepp

CSR No. 5487

Job No.: 319003

1 BY MR. KING: 11:47:54

2 Q. Mr. Orellana. 11:47:54

3 A. No. 11:47:54

4 Q. Were you aware of concerns being raised about 11:48:00

5 racial bias towards Mr. Orellana at any point? 11:48:03

6 A. Not during the search process. 11:48:08

7 Q. Did you become aware of concerns after the 11:48:11

8 search process was over? 11:48:12

9 A. When the lawsuit came in. 11:48:15

10 Q. Prior to the lawsuit being filed were you 11:48:18

11 aware of any concerns about racial animus towards 11:48:21

12 Mr. Orellana? 11:48:23

13 A. No. 11:48:26

14 MR. NORTON: Belated objection; outside the 11:48:27

15 scope of the PMK, but she answered. 11:48:30

16 BY MR. KING: 11:48:43

17 Q. Did you review the request for reconsideration 11:48:43

18 that Dean Stock submitted? 11:48:46

19 A. No. I pushed it to the provost's office. 11:48:50

20 Q. Did you review the appeal that Dean Stock 11:48:55

21 submitted? 11:48:58

22 A. I pushed that to the chancellor's office. 11:48:59

23 Q. When you say you pushed it, you didn't open 11:49:03

24 it, look at it? You just hit forward? 11:49:06

25 A. I e-mailed it to them, and if I looked at it, 11:49:10

1 I may have just quickly glanced at it. 11:49:13

2 Q. Do you know if the policy regarding reporting 11:49:23

3 incidents of harassment or retaliation applies to folks 11:49:27

4 in the chancellor's office as well? 11:49:30

5 A. Yes, it does. 11:49:33

6 Q. Do you remember the process for hiring the 11:50:35

7 Farm Director being atypical? 11:50:38

8 MR. NORTON: Objection; vague. 11:50:43

9 Go ahead. 11:50:45

10 THE WITNESS: It was only atypical because 11:50:46

11 there was a lot of faculty on the search committee and 11:50:48

12 faculty searches are run differently than staff 11:50:54

13 searches and staff administrator. 11:50:59

14 BY MR. KING: 11:51:11

15 Q. Was the search being run pursuant to a faculty 11:51:11

16 search? 11:51:14

17 A. I think there was just confusion on the 11:51:17

18 process so we -- Jenni had to explain the process to 11:51:21

19 the chair because she was a faculty member and wasn't 11:51:27

20 familiar with the process on the staff administrator's 11:51:30

21 side of the house. 11:51:34

22 MR. KING: I'll show you what I'll mark as 11:52:20

23 Exhibit 48. I know we're jumping out of order here. 11:52:22

24 Exhibit 48 is an e-mail chain, Bates numbered Stock 11:52:36

25 000559, one-page document. The first e-mail looks like 11:52:53

1 resources and her name is Leora, and I can't remember 12:56:04
2 her last name at this point. 12:56:10
3 Q. She's a former vice chancellor? 12:56:11
4 A. Correct. 12:56:17
5 Q. Do you know if Dean Stock ever submitted a 12:56:24
6 complaint about retaliation or discrimination? 12:56:36
7 A. I'm not aware of one. 12:56:39
8 MR. KING: I'm going to show you what I will 12:57:33
9 mark as Exhibit 49. Exhibit 49 is a 35 page document 12:57:51
10 beginning with Bates No. Stock 001332. 12:58:19
11 (Exhibit 49 was marked.) 12:58:31
12 BY MR. KING: 12:58:31
13 Q. Do you recognize this document? 12:58:31
14 A. I do. 12:58:32
15 Q. What is it? 12:58:33
16 A. It's our Stage 2 request for 12:58:35
17 reconsideration. 12:58:39
18 Q. What's this signature in the middle of it 12:58:42
19 here? 12:58:45
20 A. I assumed it was Dean Stock's, but I don't 12:58:46
21 know. 12:58:50
22 Q. This one? 12:58:51
23 A. I don't have any idea. 12:58:51
24 Q. You see in the introductory paragraph she 12:59:02
25 notes that she believes there's retaliation, 12:59:05

1 harassment, discrimination in connection with her 12:59:11

2 dismissal, correct? 12:59:17

3 A. I see that, yes. 12:59:18

4 Q. Did you read this at the time? 12:59:19

5 A. I glanced at it, yes. 12:59:23

6 Q. Did you refer it to Ms. Romo? 12:59:25

7 A. I did not. 12:59:28

8 Q. Why not? 12:59:31

9 A. I want to clarify a little bit here. Ms. Romo 12:59:34

10 was not in this role at the time. It was Dylan Saki. 12:59:38

11 Ms. Romo is the current EDR director and I did not 12:59:44

12 refer it to Dylan either. Why not? I don't -- I just 12:59:50

13 pushed it through the reconsideration process. 12:59:54

14 Q. You would agree with me that under the 12:59:58

15 anti-discrimination policy that applies to employees at 13:00:01

16 CSU, this is a complaint that should have been sent to 13:00:06

17 Dylan at the time? 13:00:11

18 A. Yes. 13:00:13

19 Q. It's something, a complaint that the 13:00:14

20 chancellor's office also should have sent to the equal 13:00:17

21 employment investigations group as well, correct? 13:00:23

22 A. Yes. I cannot respond whether or not they 13:00:30

23 did. 13:00:32

24 Q. But you do agree with me that they should 13:00:36

25 have? 13:00:38

1 A. Yes. 13:00:39

2 Q. Do you know why you didn't? 13:00:42

3 A. I don't know why I didn't. 13:00:44

4 Q. Did you review the evidence that Dean Stock 13:00:49

5 submitted in connection with this? 13:00:52

6 A. I glanced at it. There was a lot of 13:00:54

7 documentation with it so I moved it to the second 13:00:57

8 appeal process to go forward and dig deeper. 13:01:00

9 Q. Do you know what they did to investigate it at 13:01:04

10 the second appeals process? 13:01:07

11 A. I do not know what they did. 13:01:09

12 Q. Do you know if they did anything? 13:01:11

13 A. I don't know what they did. 13:01:14

14 Q. The anti-retaliation and discrimination 13:01:31

15 process applies to provosts as well, correct? 13:01:34

16 A. Yes. 13:01:46

17 Q. If a provost were to receive a complaint that 13:01:46

18 there were racial epithets being used by committee 13:01:51

19 members towards a member of the college, that's 13:01:54

20 probably something they should report, correct? 13:01:56

21 MR. NORTON: Objection; lacks foundation, 13:01:58

22 calls for speculation, assumes facts. 13:02:01

23 Go ahead. 13:02:04

24 THE WITNESS: I would have to reacquaint 13:02:05

25 myself with the policy and how it applies to external 13:02:07

1 individuals. 13:02:11

2 MR. KING: I'll show you what I've marked as 13:03:29

3 Exhibit 50. Exhibit 50 is a 90 page document. 13:03:30

4 (Exhibit 50 was marked.) 13:04:03

5 BY MR. KING: 13:04:03

6 Q. I'm not going to ask you to read all of it, 13:04:03

7 but it appears to be the policy that was in effect in 13:04:06

8 2023-2024 regarding discrimination and harassment, 13:04:16

9 correct? 13:04:19

10 A. It appears to be, yes. 13:04:23

11 Q. It notes that all students and employees have 13:04:31

12 the right to participate fully in CSU programs, 13:04:33

13 activities and employment free from discrimination, 13:04:38

14 harassment, et cetera, et cetera, and retaliation, 13:04:41

15 correct? 13:04:45

16 A. Correct. 13:04:46

17 Q. It notes here that "Any employee other than 13:04:56

18 those listed below who knows or has reason to know of 13:05:02

19 incidents that may violate the policy has a duty to 13:05:06

20 report those," correct? 13:05:09

21 A. Correct. 13:05:10

22 Q. It notes here "A complaint of discrimination, 13:05:31

23 harassment" -- there are a number of complaint 13:05:34

24 procedures, correct? 13:05:36

25 A. Yes. 13:05:37

1 Q. It notes that one of them under Sub Section D 13:05:40
2 here is complaints against third parties, correct? 13:05:44
3 A. Yes. 13:05:47
4 Q. That's contrasted from employees, former 13:05:47
5 employees or applicants, students and student 13:05:50
6 employees, correct? 13:05:54
7 A. Yes. 13:05:55
8 Q. And complaints against third parties should be 13:05:56
9 made under the procedures for complaints against 13:05:59
10 discrimination, correct? 13:06:02
11 A. Correct. 13:06:04
12 Q. So does that help you understand whether there 13:06:05
13 was an understanding that this policy applies to 13:06:08
14 discrimination, harassment or retaliation by third 13:06:11
15 parties? 13:06:14
16 A. Yes. 13:06:16
17 Q. And it does, correct? 13:06:16
18 A. It appears so. 13:06:18
19 Q. Having reviewed that, if Provost Perez had 13:06:22
20 become aware that there were racial statements 13:06:26
21 targeting an employee of the college being made by 13:06:29
22 third parties, that's something he should have 13:06:33
23 reported, correct? 13:06:36
24 A. Yes. 13:06:38
25 Q. I'll show you what's previously been marked as 13:07:23

1 Exhibit 29. Exhibit 29 is an e-mail from Ahmad Boura 13:07:28

2 to Steve Perez dated May 16, 2023. Do you see that? 13:07:46

3 A. I do. 13:07:51

4 Q. It's forwarding a message from Dean Stock 13:07:51

5 talking about the meeting that occurred with the Butte 13:07:54

6 County Farm Bureau. 13:08:00

7 Do you see that? 13:08:03

8 A. I do. 13:08:03

9 Q. It's attaching a document discussing it. It 13:08:07

10 notes that one of the Farm Bureau members made a racist 13:08:35

11 comment suggesting that Latinos should not be involved 13:08:39

12 in part of the FFA program. Do you see that? 13:08:42

13 A. I see that. 13:08:45

14 Q. And that other members attacked the choice of 13:08:48

15 the new Farm Director, correct? 13:08:59

16 A. I think that was in there somewhere. 13:09:01

17 Q. Is that something that Mr. Perez should have 13:09:06

18 reported? 13:09:09

19 A. Based on my understanding of the policy, yes. 13:09:10

20 The ODR director would know better. 13:09:14

21 Q. Let me show you what has previously been 13:09:42

22 marked as Exhibit 27. Exhibit 27 is a document, an 13:09:45

23 e-mail from Mr. Perez to Dean Stock, copying a number 13:10:19

24 of people including yourself, correct? 13:10:23

25 A. Yes. 13:10:31

REPORTER'S CERTIFICATE

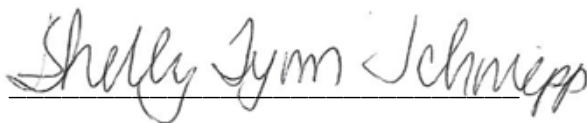
I, Shelley Lynn Schniepp, Certified Shorthand Reporter in and for the State of California, Certificate No. 5487, do hereby certify as follows:

That the witness in the foregoing deposition was by me first duly sworn to testify to the truth; that the deposition was then reported by me in shorthand and transcribed; that the above and foregoing deposition transcript is a true record of the proceedings.

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 requested.

I do further certify I am neither financially interested in the action nor a relative or employee of any attorney or party to this action.

In witness whereof, I have hereunto set my hand this 11th day of May, 2025.



SHELLEY LYNN SCHNIEPP, CSR #5487