

Exhibit 17

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

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Susana Patricia Stock, an)

individual;)

Plaintiff,) No. 2:24-cv-01043-

vs.) DJC-DMC

Board of Trustees of the State)

University, a State agency;)

Stephen Perez, an individual;)

and Does 1-10, inclusive,)

Defendants.)

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Videotaped Remote Deposition of LEORA FREEDMAN,

at Los Angeles, California, commencing at

12:03 P.M., Thursday, June 26, 2025, before

Judith Schlussel, CSR No. 4307.

1 in the appendices to the first stage request,
2 correct?

3 A. Correct.

4 MR. NORTON: Robert, can you do me a favor,
5 Robert, and zoom in a little bit so I can read that 01:23:27
6 better.

7 MR. KING: For sure. Is that better?

8 MR. NORTON: Yes.

9 Q. BY MR. KING: Did you ever ask to view the
10 stage 1 request? 01:23:38

11 A. I don't recall.

12 Q. So in connection with Dean Stock's stage 2
13 request, she raises a number of issues. Correct?

14 A. Yes.

15 Q. And she specifically raises concerns about 01:24:03
16 wrongful termination based on retaliation,
17 whistleblower, harassment, discrimination, correct?

18 MR. NORTON: Objection. The document
19 speaks for itself. But go ahead.

20 THE WITNESS: I don't actually -- didn't 01:24:19
21 read the sentence that way. But she does mention
22 those things. It was a very strange sentence. And
23 I'm going to -- I can't read that so I'm going to
24 pull up my copy.

25 Q. BY MR. KING: I'm going to ask you to 01:24:33

1 please look at my copy and I'll expand it so you can
2 read it so we can be on the same page and know that
3 we're looking at the same things. Okay?

4 A. Okay.

5 THE REPORTER: You're kind of both speaking 01:24:49
6 at the same time. Please.

7 THE WITNESS: Sorry.

8 Q. BY MR. KING: You can read that now?

9 A. Yes.

10 Q. Great. So do you recall Dean Stock raising 01:24:57
11 concerns about racial discrimination in this appeal?

12 MR. NORTON: Hold on, hold on.

13 THE WITNESS: Sorry.

14 MR. NORTON: It's overbroad as to scope.
15 It's vague. Go ahead. Document speaks for itself. 01:25:15

16 THE WITNESS: I did not interpret what she
17 was saying to allege that. I want to go back to
18 that sentence that you just read. She said that,
19 and she told me she had retained counsel in the
20 meeting. I remember that. And what this letter 01:25:30
21 says is, in discussions with legal counsel, we have
22 concluded that collectively there is clearly
23 sufficient information to establish unlawful
24 termination based on retaliation, whistleblower,
25 harassment, discrimination and tortuous interference 01:25:50

1 criteria singly or in combination, which to me means
 2 I don't know what actually. But it means that there
 3 may, you know -- that to me does not mean I am
 4 alleging discrimination. It means there might be or
 5 there might be this tortuous interference criteria 01:26:17
 6 singly. That's also a possibility. And then when I
 7 read the rest of the letter, the rest of the letter
 8 makes very clear to me why she believes she was
 9 unfairly terminated. And those are not based on her
 10 protected status. 01:26:36

11 Q. BY MR. KING: What was that?

12 A. Okay. Do you want me to go through the
 13 letter?

14 Q. I want your recollection of the opinion you
 15 formed after reading it at the time. 01:26:48

16 A. The opinion I formed was that there were, I
 17 think, three primary reasons why. One of them was
 18 that she was pursuing, to the annoyance of other
 19 people, concerns of financial mismanagement dating
 20 back to 2015 that had been partially uncovered in an 01:27:12
 21 audit that preceded her time, I believe. But that
 22 she was diligently pursuing and getting a lot of
 23 resistance to that. And that this, you know, this
 24 was one reason why she was non retained.

25 Another reason that she was non retained 01:27:32

1 was because of her selection of someone other than
 2 an internal candidate and she went into great detail
 3 in this letter about how the internal candidate was
 4 sort of part of the Farm -- what's the name of
 5 the -- the Farm Bureau clique, sort of, there was a 01:27:54
 6 clique of people who were -- had been doing business
 7 together for a long time, who were all aligned in
 8 terms of their philosophies about how the businesses
 9 and the school should proceed, and that she wanted
 10 to select somebody else and did in fact select 01:28:14
 11 somebody else. And that they were very unhappy,
 12 that the Farm Bureau folks and the former Farm
 13 Bureau -- Farm director, daily, who was on the
 14 search committee, there was a lot of dissatisfaction
 15 with her choice -- her refusal to go with an 01:28:32
 16 internal candidate.

17 And then the third reason was that she
 18 talked about a campaign by Daley, former director --
 19 former Farm director Daley to discredit her
 20 management and that he was telling the Farm Bureau 01:28:51
 21 people that she was going backwards. If you scroll
 22 down, there is a whole -- she goes into this
 23 discussion about how Daley says that she was going
 24 backwards and she wasn't leading the department well
 25 or the college well, and that she said nothing -- 01:29:07

1 you know, it's quite to the contrary, something like
2 that in her letter.

3 So clearly, there were big personality
4 conflicts and she was also alleging this, you know,
5 this resistance, great resistance to continuing the 01:29:24
6 audit that she wanted to, you know, seek.

7 Q. Did you have an understanding as to the
8 race of the Farm director that she did hire over the
9 internal candidate?

10 A. Yeah. She mentioned that she had hired -- 01:29:50
11 she sort of posits these hypotheticals, well, was it
12 because I was a Hispanic dean who hired a Hispanic
13 director, Farm director at a HSI, is that why? And
14 then she says, actually, let me find it --

15 Q. Again, I'm going to ask you not to refer to 01:30:18
16 the document outside of what we are looking at
17 together so it's preserved for the record. If you
18 would like me to scroll through the document to find
19 something, I'm happy to do so.

20 A. Yes. Would you scroll down? 01:30:30

21 Q. Sure.

22 A. Slow down. So this is where, on page --
23 we're on page -- keep going so I can see the page.
24 Page 29 where she talks -- this is where she talks
25 about she was pressured by the Farm Bureau to hire 01:30:49

1 one of their own. They objected to the selection of
2 her person. He wasn't one of their own. And
3 then -- keep going. Okay. So it's on this page
4 where she says -- she sort of posits these
5 questions. Why were they not happy with me? Was it 01:31:24
6 because -- you know, I didn't -- absolutely none of
7 them had incurred any financial cost or hardship
8 under my management. Then she says was it
9 because -- and this is where she says a Hispanic
10 dean hired a Hispanic Farm director out of HSI and 01:31:39
11 then she says, one likely reason they objected to my
12 efforts as dean was that they were convinced of this
13 fabricated crisis. And that was the third point,
14 third reason. Fabricated crisis in the mission of
15 the college delivered through sustained messaging by 01:31:58
16 none other than the former Farm director whom they
17 have many years of financial and social
18 interactions, simply put, they unquestionably
19 supported their fellow Farm Bureau member in his
20 persistent campaign declaring that the College of 01:32:13
21 Agriculture was going backwards and is in trouble.

22 The reality is exactly the opposite. Then
23 she says, the campaign was accelerated with the
24 draft reports from the Farm audit and was further
25 accelerated during the selection of the new Farm 01:32:29

1 director. Sorry. Go ahead.

2 Q. Go ahead. Didn't mean to cut you off.

3 A. No. Go ahead.

4 Q. Is it your testimony that because -- was it

5 because a Hispanic dean hired a Hispanic Farm 01:32:49

6 director at a designated Hispanic-serving

7 institution is formed in the phrase of a question

8 that it is not a complaint of racial bias?

9 A. I did not read that as a complaint of

10 racial bias. No, I did not. 01:33:08

11 Q. How about the next sentence, racist

12 sentiments were expressed by the hostile Farm Bureau

13 members at a public meeting. Did you read that as a

14 complaint of racial bias?

15 A. No. I read that as a complaint of 01:33:21

16 inappropriate or unprofessional behavior and, as we

17 discussed before, I don't know what else was said

18 there. They obviously -- it sounds like that

19 meeting did not go well and was not professional.

20 The fact that they made these -- these are non 01:33:38

21 employees who made these racist comments or racial

22 sentiments is highly inappropriate but that didn't

23 seem -- I didn't read this to be her alleging that

24 it is because of her protected status that she was

25 non retained. 01:34:03

1 And I would note that she told me that she
2 was represented by counsel. She told me -- my
3 recollection was that she was saying, this is --
4 this was wrong, I should not have been fired, and we
5 can get into what she was hoping to get out of this 01:34:25
6 meeting. But I felt that she was thinking very hard
7 about all these things, that she didn't -- I did not
8 read this to be an allegation, but I also read those
9 comments and I heard what she was saying, and that's
10 why I referred her to -- and her counsel to our 01:34:44
11 nondiscrimination policy and our whistleblower
12 policy.

13 Q. But you didn't refer this for
14 investigation, correct?

15 A. I did not, because I did not believe that I 01:34:55
16 knew or had reason to know of violations of the
17 policy.

18 Q. Going back to Exhibit 55, the last
19 paragraph here, Dean Stock writes, as noted in the
20 reconsideration for MMP procedure guidelines, I'm 01:35:46
21 including in this appeal a copy of all materials
22 considered for reconsideration, stage 1, together
23 with a copy of the response letter sent by Interim
24 Provost Lau in relation to my request for
25 reconsideration, correct? 01:36:10

1 STATE OF CALIFORNIA) ss:
2 COUNTY OF LOS ANGELES)
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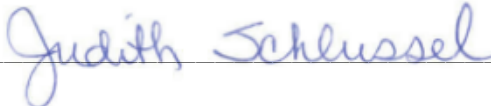
4 I, JUDITH SCHLUSSEL, C.S.R. No. 4307, do hereby
5 certify:
6

7 That the foregoing deposition testimony of LEORA
8 FREEDMAN was taken before me at the time and place
9 therein set forth, at which time the witness was
10 placed under oath and was sworn by me to tell the
11 truth, the whole truth and nothing but the truth;

12 That the testimony of the witness and all
13 objections made by counsel at the time of the
14 examination were recorded stenographically by me,
15 and were thereafter transcribed under my direction
16 and supervision, and that the foregoing pages
17 contain a full, true and accurate record of all
18 proceedings and testimony to the best of my skill
19 and ability.

20 I further certify that I am neither counsel for
21 any party to said action, nor am I related to any
22 party to said action, nor am I in any way interested
23 in the outcome thereof.
24
25

1 IN WITNESS WHEREOF, I have subscribed my name
2 this 10th day of July, 2025.

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6 JUDITH SCHLUSSEL, C.S.R. No. 4307

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