

Exhibit 18

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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.)
-----)

Videotaped Remote Deposition of DYLAN SAAKE,
at Los Angeles, California, commencing at
10:00 A.M., Tuesday, August 5, 2025, before
Judith Schlussel, CSR No. 4307.

1 further information about next steps she could take
2 after her removal?

3 A. Again, seeing an email I sent with the
4 policy and saying this is your avenue for filing
5 a -- pursuing a discrimination, retaliation, 11:47:53
6 harassment complaint. I provided her with the
7 policy.

8 Q. Why did you provide her with the policy?

9 A. I assume because she asked about how to
10 pursue something such as that. 11:48:03

11 Q. Because she asked about how to pursue a
12 discrimination complaint?

13 A. Or harassment or retaliation.

14 Q. So you provided it to her because she asked
15 about how to pursue a complaint of discrimination or 11:48:17
16 harassment, correct?

17 A. That is my assumption, which is standard
18 practice.

19 Q. Did she ask you about how to do that?

20 A. I don't know the specifics. But I did see 11:48:29
21 an email where I sent her the policy saying here's
22 the avenue to do so if you would like to.

23 Q. You've been involved in a fair number of
24 separation conversations, right?

25 A. Yeah. Fair. 11:48:46

1 Q. About how many total would you estimate?

2 A. Oh, I don't know. 20.

3 Q. In those about 20 separation conversations

4 that you've been involved in, in how many have you

5 sent the person who is being separated the 11:49:06

6 anti-discrimination policy after the fact?

7 A. You know, I don't know exactly, but if the

8 person is saying, I think this is discriminatory,

9 retaliatory, harassing, that would be the avenue.

10 Here is your avenue to pursue if you're interested. 11:49:21

11 Q. Fair to say that you don't send that as a

12 matter of course?

13 A. Correct.

14 Q. And you send it when someone raises a

15 concern about discrimination or harassment? 11:49:31

16 A. Correct.

17 Q. Just so that, again, we're on the same page

18 here, I'm going to drop into the chat what will be

19 marked as -- David, help me here -- 76. You left

20 off on 75, I believe. 11:49:53

21 Exhibit 76 which is -- once I can get my

22 computer to cooperate with me, a one-page document:

23 I apologize. I'm having some technical issues here.

24 In the chat is Exhibit 76, one-page

25 document with the Bates label Saake 223. When you 11:50:56

1 have that open in front of you, let me know. If you
2 need me to share my screen, I can.

3 (Deposition Exhibit No. 76 was marked for
4 identification.)

5 THE WITNESS: Okay. I have it. 11:51:24

6 Q. BY MS. OBANDO: Do you recognize this
7 document?

8 A. This is the email I was referencing during
9 our prior back and forth.

10 Q. So this is the email that you sent 11:51:33
11 Dr. Stock about the CSU nondiscrimination policy?

12 A. Yes.

13 Q. Do you have any reason to believe this is
14 not a true and accurate email that you sent?

15 A. No reason to believe it is not accurate. 11:51:44

16 Q. And you see the last line of the first
17 paragraph where it says, I'll follow up with the
18 other question as soon as I have an answer?

19 A. Yes.

20 Q. Does that refresh your recollection as to 11:51:57
21 whether Dr. Stock asked you for this information?

22 A. The last line?

23 Q. Sure. It says, I'll follow up with the
24 other question as soon as I have an answer. Does
25 that refresh your recollection as to whether 11:52:14

1 Dr. Stock asked you a question about the
2 nondiscrimination policy?

3 A. I assume that was referring to something
4 else outside of the nondiscrimination policy realm,
5 'cause I believe I'm equipped to answer questions 11:52:29
6 about the nondiscrimination policy. I assume that
7 was something about either -- I don't know, I don't
8 know what that was referring to, but I assume it was
9 outside the scope of this realm.

10 Q. Just to be clear, you don't know what it's 11:52:44
11 referring to when it says the other question? You
12 don't know what the other question is?

13 A. As I sit here, I do not.

14 Q. Okay. Does that sentence of I'll follow up
15 with the other question help you remember that 11:52:56
16 Dr. Stock asked you about the discrimination policy,
17 i.e., that it was a question that she asked in
18 addition to other questions?

19 MR. NORTON: Objection; asked and answered.
20 Go ahead. 11:53:09

21 THE WITNESS: Again, I read that last
22 sentence to refer to something outside of the
23 nondiscrimination world and whether it's about
24 reconsideration, whether it's about access, email,
25 whether it's about timelines, I don't know. But I 11:53:24

1 do not believe that is reference to anything in the
2 discrimination realm.

3 Q. BY MS. OBANDO: Okay. Regardless, you sent
4 her this email because you believe that she asked
5 you some questions about discrimination? 11:53:35

6 A. Yes.

7 Q. And you sent it to her on June 26, 2023,
8 correct?

9 A. That's -- I assume that's accurate.

10 Q. So fair to say that she probably asked you 11:53:46
11 those questions on or before June 26, 2023?

12 A. Yes.

13 Q. So fair to say that as of June 26, 2023,
14 you understood that she had some concerns about
15 discrimination? 11:54:04

16 MR. NORTON: Objection; calls for
17 speculation. It's vague and ambiguous. Go ahead.

18 THE WITNESS: I assume I sent her this
19 based on a conversation we had and how, you know --
20 so, yeah. 11:54:16

21 Q. BY MS. OBANDO: So yes, you had an
22 understanding as of June 26, 2023, that she had some
23 concerns about discrimination?

24 MR. NORTON: Same objections. Lacks
25 foundation. Go ahead. 11:54:26

1 THE WITNESS: Yeah.

2 Q. BY MS. OBANDO: Now, did you have any
3 conversations with Steve Perez or anyone else about
4 the reasons for Dr. Stock's removal after her
5 removal?

11:54:41

6 A. Not that I recall.

7 Q. Did you have any conversations with Terence
8 Lau, I believe that's T-E-R-A-N-C-E [sic], L-A-U,
9 after her removal?

10 A. I don't -- I believe Terence ultimately did 11:55:02
11 the level, first level of reconsideration process.
12 And so if that is about her removal, then yeah, it's
13 possible that I talked to Terence about that.

14 Q. Did you have any conversations with Steve
15 Perez about her reconsideration after the removal? 11:55:24

16 A. I do not recall. That's typically, again,
17 not my realm.

18 Q. When you say it's typically not your realm,
19 what do you mean?

20 A. That if it's reconsideration process for 11:55:38
21 MPPs, that's Sheryl who typically manages that.

22 Q. So it would be atypical for you to have
23 conversations with the person who is doing the
24 reconsideration? Is that what you're trying to say?

25 A. Well, it would be atypical to, like, foster 11:55:55

1 don't think that it's fair to say it should have.

2 Q. If we go down to the page No. 1335, let me
3 know when you're there.

4 A. Okay.

5 Q. The second paragraph, do you see that? 12:44:34

6 A. A fundamental question?

7 Q. Fundamental question here is why were Farm
8 member bureaus so upset with my performance as dean
9 or my selection as Farm director?

10 A. Uh-huh. 12:44:50

11 Q. Then continuing down another two lines or
12 so, was it because a Hispanic dean hired a Hispanic
13 Farm director at a designated Hispanic-serving
14 institution? Racist sentiments were expressed by
15 the hostile Farm Bureau members at the public 12:45:07
16 meeting where objections to the Farm director
17 selection were made. One reason these Farm Bureau
18 members objected so strongly to my efforts as dean
19 were that they were convinced, etcetera, etcetera.
20 You can read the rest of the paragraph there. 12:45:25

21 A. Uh-huh.

22 Q. You don't think that's a complaint of
23 discrimination?

24 MR. NORTON: Objection; lacks foundation.

25 Calls for speculation. Also, he has not had the 12:45:33

1 opportunity to review the entire document. You're
2 picking and choosing some sentences in here. He has
3 testified numerous times it depends on the context.
4 It seems to me, Andrea, that you want him to answer
5 a question as to whether or not this letter should 12:45:48
6 have been sent -- if you want the answer to that
7 question, I guess he should read the entire
8 document, get familiar with what you're going for
9 here.

10 MS. OBANDO: Sure. Go ahead, read the 12:46:00
11 document.

12 MR. NORTON: Let's take a break here.
13 Dylan, I guess, you can scroll through. We can stay
14 on video if you want. Go ahead and review the
15 document for me. 12:46:10

16 THE WITNESS: All right. I mean I've
17 reviewed it to a degree, kind of skimmed the parts
18 about the audit and the financials and all those
19 things and focused on the stuff I think we're
20 talking about. 12:48:04

21 Q. BY MS. OBANDO: So you feel like you've had
22 a sufficient opportunity to review the document,
23 right?

24 A. Yeah.

25 Q. Now going back to that second paragraph 12:48:11

1 that we were looking at on Page 1335, is it your
2 opinion as someone with 20 years of experience doing
3 civil rights and employment and discrimination work,
4 this is a complaint of discrimination?

5 A. I kind of keep going to the specifics, 12:48:29
6 because what I see here is saying the information
7 you received, provost, was faulty, right, and
8 perhaps tainted with animus, but it is not saying
9 that his decision was motivated by that or saying
10 that, you know, that the provost's decision was 12:48:47
11 motivated by protected status.

12 So it is kind of this in-between about like
13 you should not rely on the information you received
14 here, which is like you had bad information that's
15 -- you had bad information that is appropriately in 12:49:11
16 the reconsideration world.

17 Q. So is it your testimony that relying on
18 information that is tainted by discriminatory animus
19 is appropriate?

20 A. I think that's where an investigation, you 12:49:27
21 know, is important before you can make any of that
22 type of assessment of what happened because the
23 complaint would be that his decision was motivated
24 by animus.

25 Q. So you agree with me that an investigation 12:49:42

1 into what she's alleging here in this second
2 paragraph on Page 1335 would have been appropriate?

3 A. No. I am saying that in order to say
4 that -- the question you asked I think was, is that
5 decision tainted by animus, problematic, you know, 12:50:01
6 under the policy is where I go with my mind. I'm
7 saying we don't know, we have to look into the
8 specifics to make a decision of where this lies with
9 respect to the policy.

10 Q. So what you're saying is that you need more 12:50:17
11 information about what she is sharing in that
12 paragraph on Page 1335?

13 A. I would want more information.

14 Q. And how would you obtain that more
15 information? 12:50:30

16 A. I would send her the policy and invite her
17 to participate in the investigatory process if she
18 was interested.

19 Q. Did anyone ever refer this document,
20 Exhibit 49, to your office? 12:50:43

21 A. I do not recall.

22 Q. Your office is the appropriate office to
23 refer it to to get that investigatory process going,
24 right?

25 A. Right. I mean it would be what I did; 12:50:58

1 essentially, like, here's the process, here's the
2 policy, do you want to pursue? That would be the
3 initial step, right. It's outreach with
4 information.

5 Q. So you think that just based off of this 12:51:10
6 one paragraph here, there was nothing further that
7 should have been done about her complaints that
8 Steve Perez was relying on racist information?

9 MR. NORTON: Objection; lacks foundation.
10 Calls for speculation and assumes facts not in 12:51:22
11 evidence. Go ahead.

12 THE WITNESS: I mean we would want to give
13 her the channels to pursue that if she wanted to.

14 Q. BY MS. OBANDO: You wouldn't affirmatively
15 do anything to make sure that the decision wasn't 12:51:33
16 being tainted by animus?

17 A. You know, we -- we would look into doing an
18 investigation if that was initiated.

19 Q. And so the onus would be entirely on her to
20 initiate that. Is that what you're saying? 12:51:52

21 A. I mean it's -- you know, we give them
22 information on what we would need to pursue and
23 evaluate the complaint. That would be our step. We
24 would need input from complainants, as we would talk
25 about in our process to know if there is enough 12:52:07

1 information to open an investigation and pursue.

2 Q. So the onus would be on her to provide you
3 with a complaint that you would then investigate?

4 A. With sufficient information that we could
5 evaluate it. 12:52:21

6 Q. And so is that consistent with your
7 understanding of how to prevent discrimination at
8 CSU?

9 A. Yeah. I mean each case is unique. You
10 know, pretty standard though is concern, outreach, 12:52:34
11 ask for more information and move forward.
12 Sometimes we have more information and it's enough
13 to -- for us to move forward. But again, each
14 situation we evaluate based on the information we're
15 given. 12:52:51

16 Q. So you don't believe that her saying --
17 raising questions about a Hispanic dean hiring a
18 Hispanic Farm director at a Hispanic-serving
19 institution is sufficient to raise a concern that
20 would then prompt you to reach out to her? 12:53:04

21 A. I had already reached out.

22 Q. But you didn't recall that conversation
23 with her?

24 A. The email clearly shows I sent her the
25 policy and the information about how to file a 12:53:15

1 Q. I am going to introduce what I will mark as
2 Exhibit 79 which is a one-page document with the
3 Bates label -- it has two Bates labels. One of them
4 is DEF 46855. The other is Saake 206.

5 (Deposition Exhibit No. 79 was marked for 12:59:49
6 identification.)

7 MR. NORTON: Counsel, upon review of this
8 document, it is marked confidential. I do think it
9 would be appropriate to mark the portion of this
10 transcript and any testimony about this document as 01:00:07
11 confidential pursuant to the stipulated protective
12 order.

13 MS. OBANDO: That's fine. We can go on
14 confidential.

15 THE WITNESS: There's just one, right? 01:00:18

16 Q. BY MS. OBANDO: One page. Just one page,
17 two Bates labels.

18 A. Okay. Got it. Yes.

19 Q. Do you recognize this document?

20 A. Yeah. I mean this is our kind of case 01:00:30
21 management -- a printout from our case management
22 system and, yeah, I mean it looks like a standard
23 Maxient is the case management system,
24 M-A-X-I-E-N-T.

25 Q. And it appears to be a complaint about Clay 01:00:52

1 STATE OF CALIFORNIA) ss:
2 COUNTY OF LOS ANGELES)
3

4 I, JUDITH SCHLUSSEL, C.S.R. No. 4307, do hereby
5 certify:
6

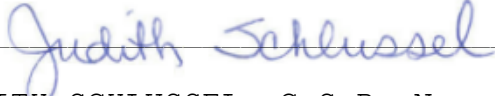
7 That the foregoing deposition testimony of DYLAN
8 SAAKE was taken before me at the time and place
9 therein set forth, at which time the witness was
10 placed under oath and was sworn by me to tell the
11 truth, the whole truth and nothing but the truth;

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.
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IN WITNESS WHEREOF, I have subscribed my name
this 11th day of August, 2025.


JUDITH SCHLUSSEL, C.S.R. No. 430