

# EXHIBIT 9

1/28/2022

BRADFORD RAY COLLINS

Page 1	Page 3
Page 2	Page 4

1/28/2022

BRADFORD RAY COLLINS

Page 5		Page 7	
1	record?	1	conversations. But when you see it typed out --
2	A. My name is Bradford Ray Collins.	2	A. It's crazy.
3	Q. And, Mr. Collins, have you ever had your	3	Q. -- and we interrupt, yes, exactly. It starts to
4	deposition taken before?	4	overlap and it's a little harder to figure out
5	A. No.	5	what it was you were trying to say when you said
6	Q. Okay. Before we get started, I'm going to go	6	it and I want to make sure your testimony is as
7	through some ground rules as well as my own	7	accurate as possible. Additionally, we have a
8	recommendations to try and make this go as	8	tendency to give both nonverbal as well as some
9	quickly and smoothly as possible for everybody.	9	unclear answers in our day-to-day lives. We like
10	A. Okay.	10	to nod and shake our head, we say things like uh-
11	Q. First, while I'm the counsel deposing you, I'm	11	huh or huh-uh. None of that, while I may
12	going to ask that if you need me to repeat	12	understand today what you meant, that's not going
13	anything, you don't understand my question --	13	to come across clearly in a written transcript.
14	A. I will ask you.	14	So try and give a verbal response to my
15	Q. -- yeah, you need some sort of clarification, you	15	questions. This isn't a marathon; if you need a
16	direct those questions to me.	16	break at any point in time, just let me know. It
17	A. I will definitely. I will.	17	should not take very long, but if you need a
18	Q. Next, your attorney may object to the form of my	18	break and we haven't taken one, you just say so
19	question, but unless you're specifically told not	19	and we'll take one. Do you understand everything
20	to, I'm still gonna have you answer those	20	I've gone through thus far?
21	questions. Those objections --	21	A. So far so good, yeah.
22	A. Okay.	22	Q. Did you do anything to prepare for today's
23	Q. -- are being put on the record, but you go ahead	23	deposition?
24	and just kind of let them finish talking and then	24	A. Not really. I had a brief conversation with Evan
25	you keep talking unless you're told otherwise.	25	over here, which he went over some of the same
Page 6		Page 8	
1	A. Okay.	1	rules.
2	Q. Third, you're not allowed to engage in any	2	Q. I don't want to know what yet talked to about
3	private, off-the-record conversations with your	3	him.
4	attorney about the testimony that you're giving	4	A. No, no. A brief conversation.
5	now that your deposition has began until after	5	Q. But did you do anything besides talking to your
6	it's over.	6	attorney about your thing today?
7	A. Okay.	7	A. Absolutely not.
8	Q. So if we take any break, you can't go ask how to	8	Q. Did you review any documents when you were
9	answer a question or this, that and the other.	9	getting ready for today?
10	A. Okay.	10	A. No.
11	Q. There are some rare circumstances where that	11	Q. Who, if anyone besides your attorney, knows you
12	might be different, but we would talk about that	12	have a deposition today?
13	on the record first.	13	A. I've mentioned it to a couple of people at school
14	A. Okay.	14	who are also involved in this case or have been
15	Q. Additionally, we have a court reporter here,	15	involved in this case. Just kind of curious to
16	she's taking down that every down everything that	16	see if they've been deposed as well. But that's
17	everybody's saying and she's putting it into a	17	it.
18	written transcript. With that in mind and in	18	Q. Who did you ask?
19	order to keep the written transcript as clear as	19	A. I asked Laura Kissel if she was being deposed. I
20	possible and as accurate as possible as far as	20	asked Peter Chametzky.
21	what your testimony is, try and let me finish	21	Q. Is there anything that might make it difficult
22	asking a question before you begin speaking.	22	for you to truthfully answer my questions today?
23	A. Yes.	23	A. Absolutely nothing.
24	Q. And I'll try my best to do the same for you. We	24	Q. Do you have any issues with recall or your memory
25	do this every day in our normal day-to-day	25	in general?

1/28/2022

BRADFORD RAY COLLINS

Page 9	Page 11
<p>1 A. In general, no. In specifics, yes.</p> <p>2 Q. Anything out of the ordinary from anybody else's</p> <p>3 memory?</p> <p>4 A. No.</p> <p>5 Q. Okay. Are you taking any drugs or medications</p> <p>6 that might interfere with your ability to answer</p> <p>7 my questions?</p> <p>8 A. No.</p> <p>9 Q. If at anytime during your deposition you realize</p> <p>10 an answer you've already given me as either</p> <p>11 incomplete or incorrect, will you let me know?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 A. This is -- this is hard talking. This is</p> <p>15 practice. This takes practice.</p> <p>16 Q. When I tell people not to interrupt people,</p> <p>17 people think it's super obvious, right? And then</p> <p>18 they realize how much we do it in day-to-day</p> <p>19 conversations and it does become more difficult.</p> <p>20 No, I understand. I apologize. What was -- what</p> <p>21 is your current address?</p> <p>22 A. 1315 Glenhaven Drive in Columbia, South Carolina.</p> <p>23 Q. And how long have you lived there?</p> <p>24 A. I would say over 20 years.</p> <p>25 Q. What is your date of birth?</p>	<p>1 A. Her name is Alexandra Mathwig.</p> <p>2 Q. And then do you have any other immediate family</p> <p>3 who live in South Carolina who are over the age</p> <p>4 of 18?</p> <p>5 A. No.</p> <p>6 Q. Do you attend a church?</p> <p>7 A. No, I do not.</p> <p>8 Q. Are you involved in any civic organizations?</p> <p>9 A. No, I am not.</p> <p>10 Q. Are you involved in any professional</p> <p>11 organizations?</p> <p>12 A. Yes.</p> <p>13 Q. What professional organizations?</p> <p>14 A. The College Art Association.</p> <p>15 Q. Is that a national organization?</p> <p>16 A. It's a national organization.</p> <p>17 Q. Are you on the board or anything like that?</p> <p>18 A. No. I used to be but not now.</p> <p>19 Q. What social media sites do you use?</p> <p>20 A. Google? Is that what you mean? Is that what you</p> <p>21 mean?</p> <p>22 Q. Like Facebook, Instagram?</p> <p>23 A. I do Facebook. Yeah, I do Facebook. Less --</p> <p>24 less than I used to.</p> <p>25 Q. So you have a Facebook.</p>
Page 10	Page 12
<p>1 A. December 7, 1942.</p> <p>2 Q. Are you married?</p> <p>3 A. I am married.</p> <p>4 Q. And who are you married to?</p> <p>5 A. I'm married to Stacey Milner-Collins.</p> <p>6 Q. And what does your wife do?</p> <p>7 A. My work is a yoga teacher. She used to own City</p> <p>8 Yoga.</p> <p>9 Q. Does she still teach with a studio?</p> <p>10 A. Not -- well, not right now. She's teaching from</p> <p>11 home until the -- until COVID is over.</p> <p>12 Q. Yup, I understand. Have you been married</p> <p>13 previously?</p> <p>14 A. I have been.</p> <p>15 Q. Okay. And does your prior spouse live in South</p> <p>16 Carolina?</p> <p>17 A. She does not.</p> <p>18 Q. Do you have any children who are over the age of</p> <p>19 18 who live in South Carolina?</p> <p>20 A. Yes, I have two.</p> <p>21 Q. All right. What are their names?</p> <p>22 A. Living -- did you say living in South Carolina?</p> <p>23 Q. Yes.</p> <p>24 A. I have one living in South Carolina.</p> <p>25 Q. What's their name?</p>	<p>1 A. I have Facebook.</p> <p>2 Q. Do you have any accounts with other social media</p> <p>3 sites?</p> <p>4 A. No, I do not. No.</p> <p>5 Q. Any Instagram?</p> <p>6 A. No, I do not.</p> <p>7 Q. I keep telling people I need to update my</p> <p>8 questions because I have MySpace listed as a</p> <p>9 possible question.</p> <p>10 A. Whoa.</p> <p>11 Q. But earlier this week someone told me they had a</p> <p>12 Tik Tok account and I was like, well, that's how</p> <p>13 I know that these questions are really out of</p> <p>14 date because I just asked you about MySpace and</p> <p>15 you told me in response that you had a Tik Tok.</p> <p>16 So I'm working on it. Have you posted,</p> <p>17 commented, talked to anybody on Facebook about</p> <p>18 Jaime's lawsuit or Pam's lawsuit or any of the</p> <p>19 allegations against David Voros?</p> <p>20 A. Not to my -- not to my recollection. I mean, you</p> <p>21 guys have my emails, I'm sure. And you could</p> <p>22 correct me on that but it is not --</p> <p>23 Q. You're not posting things --</p> <p>24 A. To my best --</p> <p>25 Q. -- on your Facebook --</p>

1/28/2022

BRADFORD RAY COLLINS

Page 13	Page 15
<p>1 A. No, no.</p> <p>2 Q. -- is kind of my question.</p> <p>3 A. I do not believe so. To the best of my</p> <p>4 knowledge, I do not believe so.</p> <p>5 Q. Where did you graduate from high school?</p> <p>6 A. West Springfield High School, Massachusetts.</p> <p>7 Q. And what is your highest level of education?</p> <p>8 A. I have a Ph.D.</p> <p>9 Q. In a narrative fashion, can you tell me kind of</p> <p>10 where you went to school after high school, what</p> <p>11 degree, if any, you got from each institution or</p> <p>12 college, when you got it, and what the degree was</p> <p>13 in?</p> <p>14 A. I can.</p> <p>15 Q. Thank you.</p> <p>16 A. All right. I have a BA in American Studies from</p> <p>17 Amherst College in Massachusetts. And then I</p> <p>18 have a Ph.D. from Yale University in art history.</p> <p>19 Q. And then when did you receive that bachelor's</p> <p>20 degree?</p> <p>21 A. I got a bachelor's degree in 1964 and I got a</p> <p>22 Ph.D. in 1980.</p> <p>23 Q. Thank you very much. Are you currently employed?</p> <p>24 A. I am.</p> <p>25 Q. Where are you employed?</p>	<p>1 A. Two years.</p> <p>2 Q. flourished?</p> <p>3 A. Two years. So and I've been here since 1987.</p> <p>4 Q. And what was your position when you first came to</p> <p>5 work at the University of South Carolina?</p> <p>6 A. I was an assistant professor.</p> <p>7 Q. And had you had tenure at any of your prior</p> <p>8 positions?</p> <p>9 A. No.</p> <p>10 Q. Was the assistant professor position you took at</p> <p>11 USC, was that a tenure track position?</p> <p>12 A. It was a tenure track position, correct.</p> <p>13 Q. And then how long were you working in the</p> <p>14 assistant professor position before you received</p> <p>15 a promotion?</p> <p>16 A. I think I got promoted in five years,</p> <p>17 approximately. It could have been four, but</p> <p>18 either four or five.</p> <p>19 Q. And your promotion was to professor?</p> <p>20 A. No, that promotion was to associate professor.</p> <p>21 Q. Okay.</p> <p>22 A. And I was in that position for about seven or</p> <p>23 eight years before I was promoted to full</p> <p>24 professor.</p> <p>25 Q. And did you receive tenure at some point during</p>
Page 14	Page 16
<p>1 A. At the University of South Carolina.</p> <p>2 Q. And what is your job with the University?</p> <p>3 A. I'm a professor. I teach art history.</p> <p>4 Q. And then also in a kind of a narrative fashion,</p> <p>5 can you let me know where you worked after --</p> <p>6 after college, at least within the teaching</p> <p>7 field, what you did there before you came to work</p> <p>8 for the University of South Carolina?</p> <p>9 A. Okay. I had -- I worked at the University of</p> <p>10 British Columbia for about six years. And then -</p> <p>11 -</p> <p>12 Q. What were you doing there?</p> <p>13 A. I was teaching art history.</p> <p>14 Q. Okay.</p> <p>15 A. Okay. And then I had a -- I taught briefly at</p> <p>16 Willamette University. Then I taught at the</p> <p>17 University of Illinois in Chicago. And then I</p> <p>18 ran a cabaret theater in Washington, in Seattle,</p> <p>19 Washington, before returning to art history at</p> <p>20 Florida State University before coming here.</p> <p>21 Q. And how long did you teach at UIC?</p> <p>22 A. I taught for five years at UIC.</p> <p>23 Q. And how long were you working with the cabaret?</p> <p>24 A. The cabaret, for two years.</p> <p>25 Q. And then how long at Florida State?</p>	<p>1 that?</p> <p>2 A. Yes, I did. I -- you get tenure when you get to</p> <p>3 the associate level.</p> <p>4 Q. Okay. Have you ever been terminated from any</p> <p>5 employment?</p> <p>6 A. No, I have not.</p> <p>7 Q. Have you ever received any major disciplinary</p> <p>8 action from the University of South Carolina?</p> <p>9 A. I have not.</p> <p>10 Q. And currently as a professor in art history, what</p> <p>11 building -- I guess let me back up. You have an</p> <p>12 office, where is your office housed?</p> <p>13 A. My office is in McMaster on the -- on the fourth</p> <p>14 floor of McMaster.</p> <p>15 Q. All right. And are the courses you teach</p> <p>16 typically within McMaster as well?</p> <p>17 A. Yes, they are. Indeed they are.</p> <p>18 Q. And approximately how many classes are you</p> <p>19 teaching in a given semester?</p> <p>20 A. The standard, I teach two a semester.</p> <p>21 Q. And are you typically teaching undergraduate</p> <p>22 versus graduate?</p> <p>23 A. I teach one graduate course a year and three</p> <p>24 undergraduate classes.</p> <p>25 Q. Perfect. Thank you.</p>

1/28/2022

BRADFORD RAY COLLINS

Page 17	Page 19
<p>1 A. And that's fairly standard.</p> <p>2 Q. Can you recall when and how you first met Jaime Misenheimer?</p> <p>3 A. No.</p> <p>4 Q. Did you meet her prior to working --</p> <p>5 A. No, no, I did not --</p> <p>6 Q. -- at USC?</p> <p>7 A. -- meet her. No, no. It had to have been while she was working at the University. And I believe</p> <p>8 at that point, I believe she was a graduate</p> <p>9 student at the time that I met her.</p> <p>10 Q. Okay. Do you know Jaime at all outside of your -</p> <p>11 -</p> <p>12 A. No.</p> <p>13 Q. -- time at USC?</p> <p>14 A. No, no. Not at all, no.</p> <p>15 Q. Can you recall when and how you met Pam Bowers?</p> <p>16 A. I met Pam Bowers when she was hired as an</p> <p>17 instructor at the University.</p> <p>18 Q. Were you involved in any way in the decision to</p> <p>19 hire Pam?</p> <p>20 A. I was involved in the hiring of David and the</p> <p>21 hiring of -- I -- I had nothing to do with the</p> <p>22 hiring of Pam.</p> <p>23 Q. Did you meet both Pam Bowers and David Voros at</p>	<p>1 A. I --</p> <p>2 Q. -- future?</p> <p>3 A. -- would report to the chair of the department</p> <p>4 until we became a school at which point the chair</p> <p>5 of the department became the director of the</p> <p>6 school.</p> <p>7 Q. Perfect. Thank you. It's why I ask these</p> <p>8 questions. Were you ever involved in the</p> <p>9 decision to demote, transfer, fire, assigned</p> <p>10 courses to, Jaime Misenheimer?</p> <p>11 A. No. No, no involvement in that at all.</p> <p>12 Q. Did you ever work directly with Jaime while she</p> <p>13 was working with the school?</p> <p>14 A. I did not, no.</p> <p>15 Q. Were you ever involved in a decision to demote,</p> <p>16 transfer, fire, anything, with Pam Bowers'</p> <p>17 employment?</p> <p>18 A. I had no involvement in that.</p> <p>19 Q. Did you ever work directly with Pam Bowers on</p> <p>20 anything?</p> <p>21 A. I did not. I mean Pam Bowers and Jaime are in</p> <p>22 the -- are in the studio area. The university --</p> <p>23 the School of Visual Art and Design has four</p> <p>24 distinct areas.</p> <p>25 Q. Okay.</p>
Page 18	Page 20
<p>1 about the same time?</p> <p>2 A. About the same time. The same year that they</p> <p>3 were -- that David was applying for the job.</p> <p>4 Q. And what was your involvement in the hiring of</p> <p>5 David Voros?</p> <p>6 A. I was on the search committee that hired him.</p> <p>7 Q. And do you know what he was hired to do?</p> <p>8 A. He was hired to teach painting and he was hired</p> <p>9 to be in charge of the area, the painting area in</p> <p>10 the studio. The painting area in the studio area</p> <p>11 of the department.</p> <p>12 Q. What department was that?</p> <p>13 A. The department -- at that time it was the</p> <p>14 Department of Arts.</p> <p>15 Q. Okay. And is that not currently the department?</p> <p>16 A. No. No. It is now the School of Visual Art and</p> <p>17 Design.</p> <p>18 Q. Who is your direct supervisor?</p> <p>19 A. My direct supervisor is Laura Kissel.</p> <p>20 Q. And what is her position?</p> <p>21 A. She's the director of the School of Visual Art</p> <p>22 and Design.</p> <p>23 Q. And while the director may have changed</p> <p>24 throughout time, have you reported to the</p> <p>25 director of the school for at least the recent --</p>	<p>1 A. Okay. And one area is our history, and another</p> <p>2 area is studio. And the courses -- each of these</p> <p>3 areas has a program director, okay, who answers</p> <p>4 to the director of the school. But the people in</p> <p>5 art -- the art historians have nothing to do with</p> <p>6 what happens in the studio area. We have no</p> <p>7 involvement in the hiring, firing, whatever.</p> <p>8 Q. So is it fair to say that while you work in the</p> <p>9 same building, you're slightly different</p> <p>10 departments within the School of Visual Art and</p> <p>11 Design?</p> <p>12 A. Yes. Yes, it's fair to say.</p> <p>13 Q. Okay. Have you spoken to David Voros at all</p> <p>14 about Pam Bowers at any point?</p> <p>15 A. I have,</p> <p>16 Q. And what were kind of the topics of those</p> <p>17 discussions?</p> <p>18 A. Well, in general -- in general, he -- the general</p> <p>19 cases that were against him and how he felt about</p> <p>20 them.</p> <p>21 Q. How would you describe your relationship with</p> <p>22 David Voros?</p> <p>23 A. We are -- we are friendly colleagues. We are --</p> <p>24 I wouldn't call us friends. We do not socialize</p> <p>25 outside of school. In some ways -- in some ways</p>

1/28/2022

BRADFORD RAY COLLINS

Page 21	Page 23
<p>1 my relationship with David, I have been something</p> <p>2 of a big brother to David. I like David and --</p> <p>3 and from time to time, he would come to me with</p> <p>4 questions and, you know, discuss -- discuss</p> <p>5 problems and we would talk. So we are -- we are</p> <p>6 on friendly terms, that would be the -- friendly</p> <p>7 colleagues would be in my description.</p> <p>8 Q. All right. And so is it fair to say while you</p> <p>9 may not be going out outside of work, you do</p> <p>10 interact with each other at the University?</p> <p>11 A. Rarely.</p> <p>12 Q. Okay. All right. And what were the cases</p> <p>13 against David that he was talking to you about?</p> <p>14 A. The Dunavant case and the Pam Bowers and Jaime</p> <p>15 case.</p> <p>16 Q. Just those three?</p> <p>17 A. Yes.</p> <p>18 Q. And what did he express to you about the Dunavant</p> <p>19 case?</p> <p>20 A. He thought he was -- he thought he was being</p> <p>21 mistreated. He didn't think he had mistreated</p> <p>22 her. He did not for a minute believe that he had</p> <p>23 sexually harassed her, as she has said, and so</p> <p>24 she -- yeah, that's it.</p> <p>25 Q. And what has he told you about the Pam Bowers</p>	<p>1 Q. That's sounds right. I don't know if they've</p> <p>2 changed their name or anything --</p> <p>3 A. I don't know.</p> <p>4 Q. -- like that now.</p> <p>5 A. Well, it's the Post and Courier I think.</p> <p>6 Q. Oh, is it? Now it's switched again.</p> <p>7 A. You need -- you need to keep up.</p> <p>8 Q. They switch a lot.</p> <p>9 A. You keep up with Tik Tok and not the newspaper.</p> <p>10 You're spending too much time.</p> <p>11 Q. I know.</p> <p>12 A. Anyway, go ahead.</p> <p>13 Q. So you spoke to a reporter; is that fair to say?</p> <p>14 A. I did. I spoke to one.</p> <p>15 Q. Okay. And then you received some -- you said you</p> <p>16 received some nasty emails?</p> <p>17 A. A couple.</p> <p>18 Q. All right. And were those -- who are those from?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay.</p> <p>21 A. Yeah.</p> <p>22 Q. Were they from the newspaper or --</p> <p>23 A. No, no, no. No, no, no, no.</p> <p>24 Q. Okay. These were private emails?</p> <p>25 A. Private emails.</p>
Page 22	Page 24
<p>1 case?</p> <p>2 A. It's very hard to remember. I --</p> <p>3 Q. I guess if -- let me back up a little bit. When</p> <p>4 you say the Pam Bowers case, do you mean the</p> <p>5 current case she has against the University and</p> <p>6 David and --</p> <p>7 A. I'm not sure.</p> <p>8 Q. Okay.</p> <p>9 A. And in many ways, you know, in some ways I should</p> <p>10 correct myself. I -- because I -- I believe the</p> <p>11 last time I spoke with him about this he, you</p> <p>12 know, he had said that he really wasn't at</p> <p>13 liberty to talk about the case, so we didn't.</p> <p>14 And the occasion for that was I had spoken to the</p> <p>15 newspaper, I had been called by the newspaper on</p> <p>16 the subject, and I had -- I had defended David.</p> <p>17 And, afterward, I had received a couple of nasty</p> <p>18 emails and David and I talked about that. And</p> <p>19 but that was -- so that was not -- it was</p> <p>20 indirectly about the case, not directly about the</p> <p>21 case.</p> <p>22 Q. Do you recall what newspaper you spoke to?</p> <p>23 A. The State.</p> <p>24 Q. And --</p> <p>25 A. I think at the time it was The State.</p>	<p>1 Q. And what was kind of the substance of those</p> <p>2 emails?</p> <p>3 A. Oh, just that I shouldn't be defending him</p> <p>4 basically.</p> <p>5 Q. Okay.</p> <p>6 A. That's it. Simple as that.</p> <p>7 Q. And you don't know who they came from?</p> <p>8 A. No, I don't.</p> <p>9 Q. Do you remember if they came to your school</p> <p>10 email?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. Did you send those on or let anybody know</p> <p>13 you received them?</p> <p>14 A. Not really. I just ignored them.</p> <p>15 Q. And then have you had any conversations with</p> <p>16 David about Jaime's case?</p> <p>17 A. No, none. None.</p> <p>18 Q. Do you know any of the particulars about any of</p> <p>19 the lawsuits that have been filed?</p> <p>20 A. No, I don't. I know more about the Dunavant</p> <p>21 lawsuit.</p> <p>22 Q. Okay.</p> <p>23 A. Partly because I was -- I was on -- I was on Ms.</p> <p>24 Dunavant's committee and so I had her -- her MFA</p> <p>25 committee.</p>

1/28/2022

BRADFORD RAY COLLINS

Page 25	Page 27
<p>1 Q. Okay, yup.</p> <p>2 A. And because when she -- when she returned after</p> <p>3 that summer, she in fact came to talk to me about</p> <p>4 the incident, complaining about the incident. So</p> <p>5 I had a great deal of familiarity about that.</p> <p>6 But I have very little familiarity with the Jaime</p> <p>7 and Pam case, quite frankly.</p> <p>8 Q. Have you heard anything from any of the students</p> <p>9 about the cases against David?</p> <p>10 A. I have not. No, I have not heard from a single</p> <p>11 student.</p> <p>12 Q. Okay. And have you said anything to any students</p> <p>13 about the allegations?</p> <p>14 A. Oh, absolutely not. No.</p> <p>15 Q. Have you ever made any allegations that people</p> <p>16 are lying about David to students?</p> <p>17 A. Oh, no, absolutely not.</p> <p>18 Q. Have you heard any statements made about David</p> <p>19 since all of this started?</p> <p>20 A. Statements made by anyone, no. I mean what --</p> <p>21 Q. Have they made any statements to you?</p> <p>22 A. No one has made a statement to me.</p> <p>23 Q. Okay.</p> <p>24 A. No, no.</p> <p>25 Q. And has anybody made any statements about Jaime</p>	<p>1 in general, yes.</p> <p>2 Q. And then do you know is there a set person you're</p> <p>3 supposed to report any of those things to?</p> <p>4 A. I don't believe. I don't know. I would begin</p> <p>5 with my department chair.</p> <p>6 Q. Who is your current department chair?</p> <p>7 A. Well, the director, that's Laura Kissel.</p> <p>8 Q. Thank you</p> <p>9 A. I would begin with Laura Kissel.</p> <p>10 Q. And prior to Laura, was it Peter Chametzky?</p> <p>11 A. It was Peter Chametzky, correct.</p> <p>12 Q. In the time that you've been employed at USC,</p> <p>13 have you ever made a Title IX report?</p> <p>14 A. I have not.</p> <p>15 Q. Have you ever heard any allegation that a student</p> <p>16 has been harassed or assaulted or --</p> <p>17 A. I have not.</p> <p>18 Q. -- anything?</p> <p>19 A. No, I have not. It's a pretty safe environment.</p> <p>20 Q. And does most of what you do at the University</p> <p>21 remain within the one McMaster building?</p> <p>22 A. Absolutely. All of it.</p> <p>23 Q. Okay. So you're kind of in your one --</p> <p>24 A. Yeah.</p> <p>25 Q. -- I guess space within --</p>
Page 26	Page 28
<p>1 to you?</p> <p>2 A. Absolutely not.</p> <p>3 Q. Has anybody made any statements about Pam to you?</p> <p>4 A. No, none.</p> <p>5 Q. Do you know -- are you aware of whether or not</p> <p>6 you're a mandatory reporter under Title IX with</p> <p>7 your position?</p> <p>8 A. What's that again?</p> <p>9 Q. Do you know if you're a mandatory Title IX</p> <p>10 reporter for the University?</p> <p>11 A. I think all faculty are.</p> <p>12 Q. And what is your understanding of what that</p> <p>13 means?</p> <p>14 A. Oh. Well, if something comes up, some incident</p> <p>15 occurs, then you should speak to the appropriate</p> <p>16 people. Now, I don't always know who the</p> <p>17 appropriate people would be, but the first thing</p> <p>18 I would do is find out who the appropriate people</p> <p>19 are and then I would speak to the appropriate</p> <p>20 people.</p> <p>21 Q. And then you just said if something comes up or</p> <p>22 an incident occurs. Do you know what kinds of</p> <p>23 incidents you're supposed to report?</p> <p>24 A. Well, any sexual harassment, gender harassment,</p> <p>25 or gender prejudice, any misbehavior of -- yeah,</p>	<p>1 A. From time to time, we teach in another building</p> <p>2 but -- but it's fair to say that it's almost</p> <p>3 entirely within McMaster.</p> <p>4 Q. And then in your position as an art history</p> <p>5 professor, are you permitted -- I can't speak</p> <p>6 this morning or afternoon -- primarily dealing</p> <p>7 with art majors of some sort?</p> <p>8 A. Yes.</p> <p>9 Q. Okay.</p> <p>10 A. I would say probably -- I'd say probably about 40</p> <p>11 percent of them are involved in the art</p> <p>12 department and the others are students from other</p> <p>13 departments; psychology, English, history, and</p> <p>14 some of the sciences.</p> <p>15 Q. What is your understanding of why Jaime</p> <p>16 Misenheimer is no longer teaching with USC?</p> <p>17 A. I have no idea. And I didn't even know that she</p> <p>18 wasn't quite frankly.</p> <p>19 Q. Okay.</p> <p>20 A. That's how in the loop I am. I did not know she</p> <p>21 was no longer teaching.</p> <p>22 Q. And do you know if Pam is still teaching with the</p> <p>23 University?</p> <p>24 A. I believe she is.</p> <p>25 Q. Okay.</p>



1/28/2022

BRADFORD RAY COLLINS

Page 29	Page 31
<p>1 A. I believe she is. I was on medical leave last</p> <p>2 year.</p> <p>3 Q. Okay.</p> <p>4 A. So I'm a --</p> <p>5 Q. A little out of the --</p> <p>6 A. -- little out of the loop.</p> <p>7 Q. Between that and remote COVID things --</p> <p>8 A. Yeah, exactly.</p> <p>9 Q. -- you might not know what's going on.</p> <p>10 A. Exactly.</p> <p>11 Q. I understand.</p> <p>12 A. But it is my understanding that Pam is still</p> <p>13 teaching at the University.</p> <p>14 Q. Were you contacted by anybody at the University</p> <p>15 to investigate any allegations that Pam made</p> <p>16 about David?</p> <p>17 A. Absolutely not. No, I was not talked to, no.</p> <p>18 Q. And were you ever contacted by anybody at the</p> <p>19 University as far as investigating any of the</p> <p>20 allegations that Jaime Misenheimer made?</p> <p>21 A. Oh, no, no. No, I was not.</p> <p>22 Q. Have you ever been contacted by the University as</p> <p>23 far as any investigation they were conducting?</p> <p>24 A. No one calls me.</p> <p>25 Q. All right. Let's go ahead and take a quick five-</p>	<p>1 Q. All right. And one of the other statements was</p> <p>2 that David has a strong personality.</p> <p>3 A. Yes, he does.</p> <p>4 Q. Would you have made that statement?</p> <p>5 A. I -- definitely. Definitely has a strong</p> <p>6 personality.</p> <p>7 Q. All right. And then the last statement was that</p> <p>8 the lawsuits are the actual harassers in this</p> <p>9 situation, do you know --</p> <p>10 A. Did I say that?</p> <p>11 Q. Well, it's in the newspaper article that you were</p> <p>12 also interviewed in, which is why I'm kind of</p> <p>13 asking those questions is because I'm trying to -</p> <p>14 -</p> <p>15 A. I don't -- I don't --</p> <p>16 Q. -- narrow that down.</p> <p>17 A. -- I don't remember saying that. And I don't</p> <p>18 know if in the article it was quoted that way,</p> <p>19 but --</p> <p>20 Q. Did you ever make any statements that the</p> <p>21 lawsuits are harassing in any way?</p> <p>22 A. It's quite possible.</p> <p>23 Q. Okay. And why would you have made that</p> <p>24 statement?</p> <p>25 A. I would have made that statement because I -- I</p>
Page 30	Page 32
<p>1 minute break.</p> <p>2 (Off the record from 1:32 p.m. until 1:46 p.m.)</p> <p>3 BY MS. ALBRECHT:</p> <p>4 Q. I just have a handful of questions. Were you</p> <p>5 involved in the promotion when Pam was promoted</p> <p>6 from a regular instructor to a senior instructor?</p> <p>7 Do you recall that?</p> <p>8 A. Not to my recollection.</p> <p>9 Q. Okay.</p> <p>10 A. Not to my recollection. I mean I don't know what</p> <p>11 year that was and I don't -- I don't know -- not</p> <p>12 to my recollection. I do not recollect.</p> <p>13 Q. And have you made any statements to anybody about</p> <p>14 the various student activism that has taken place</p> <p>15 throughout McMaster?</p> <p>16 A. I have not.</p> <p>17 Q. All right. And then there were some statements</p> <p>18 in the newspaper after you'd given your</p> <p>19 interview, one of which said you had said that</p> <p>20 David had a temper. Do you recall making a</p> <p>21 statement that David had a temper?</p> <p>22 A. I might have.</p> <p>23 Q. Okay. Would you agree that David has a temper?</p> <p>24 A. Yeah, David has a temper. David is a strong-</p> <p>25 minded individual.</p>	<p>1 think that that could -- that could be true.</p> <p>2 That is -- that is quite possibly true. Now, do</p> <p>3 I know that that's true? No. But that was my</p> <p>4 opinion. I spoke to the newspapers for one</p> <p>5 reason; I spoke to them because up until that</p> <p>6 point David had -- David had, I believe, had been</p> <p>7 tried and convicted in the newspapers, and no one</p> <p>8 had -- no one had mentioned the fact that there's</p> <p>9 two sides of the story and that there could be</p> <p>10 some exaggerations and some things that aren't</p> <p>11 true. And I just thought that -- that I owed it</p> <p>12 to not necessarily to David, but I owed it to the</p> <p>13 situation. As a colleague, I thought I owed it</p> <p>14 to David to say maybe let's stop the rush to</p> <p>15 judgment because he's been, really has been,</p> <p>16 tarred and feathered in the press. And anyway, I</p> <p>17 think there's a possibility that -- that the --</p> <p>18 and again, I don't know, I don't know all the</p> <p>19 details of this, of this case. I don't know what</p> <p>20 they're accusing him of.</p> <p>21 Q. Do you know which, if any, of the accusations in</p> <p>22 the newspapers are true versus which are false or</p> <p>23 anything like that?</p> <p>24 A. I do know one that's false.</p> <p>25 Q. Okay.</p>

1/28/2022

BRADFORD RAY COLLINS

Page 33	Page 35
<p>1 A. And that is the statement that is the -- the</p> <p>2 claim made by Allison Dunavant that David had</p> <p>3 sexually harassed her, had tried to invite her</p> <p>4 into his relationship with Alex Stasko. And I</p> <p>5 know that that is not true. And I suspected that</p> <p>6 it was not true before I found out that it was</p> <p>7 not true. And I suspected it was not true</p> <p>8 because when Alex -- that when Allison Dunavant</p> <p>9 came to me to talk to me after the summer, she</p> <p>10 did not mention that. And I thought it was very</p> <p>11 odd that she would not have mentioned that if it</p> <p>12 turns out -- so I didn't -- I suspected that she</p> <p>13 -- that was not true. And since then I have</p> <p>14 learned that that was not true. So that was the</p> <p>15 only -- that's the only fact in the situation</p> <p>16 that I'm -- that I'm -- that I'm aware of.</p> <p>17 Anything else, no, I don't.</p> <p>18 Q. And how did you find out that accusation was not</p> <p>19 true?</p> <p>20 A. I heard that from him. From -- from Evan --</p> <p>21 Q. Oh, I don't want to know about your conversations</p> <p>22 with Evan. Did you ever make any statements to</p> <p>23 anybody in your courses or any of your students</p> <p>24 that they should turn in anybody who is spreading</p> <p>25 lies about anybody else at the University?</p>	<p>1 A. No, I have not.</p> <p>2 Q. Okay. Do you have any information, either</p> <p>3 positive or negative, about Jaime Misenheimer's</p> <p>4 work performance while being an adjunct</p> <p>5 professor?</p> <p>6 A. I have -- no, I have no knowledge of that at all.</p> <p>7 Q. Okay. And the same question as it applies to Ms.</p> <p>8 Bowers.</p> <p>9 A. The -- I was interim chair in the department on</p> <p>10 two occasions. And, as such, I would have</p> <p>11 reviewed her, Jaime's -- I mean not Jaime -- I</p> <p>12 would have reviewed Pam's teaching evaluations.</p> <p>13 And as I remember, she was a fine teacher. And</p> <p>14 so that -- I --</p> <p>15 Q. Okay.</p> <p>16 A. That's my recollection.</p> <p>17 Q. Very good. Thank you, sir, I don't have any</p> <p>18 other questions.</p> <p>19 A. You're welcome.</p> <p>20 MR. GESSNER: Nothing from me.</p> <p>21 MS. ALBRECHT: I just have one more because I didn't</p> <p>22 read my notes carefully enough.</p> <p>23 REEXAMINATION</p> <p>24 BY MS. ALBRECHT:</p> <p>25 Q. Do you know if the University has any policies</p>
Page 34	Page 36
<p>1 A. Oh, I don't remember doing that. I don't -- I</p> <p>2 tend not to -- I -- I don't have a tendency to do</p> <p>3 that, so I wouldn't be very, very surprised if</p> <p>4 that's the case. But I certainly do not</p> <p>5 remember. I certainly do not remember saying</p> <p>6 that to any of my classes.</p> <p>7 Q. And do you have any personal knowledge about what</p> <p>8 went on between David and Allison?</p> <p>9 A. No. All I know is what Allison told me and what</p> <p>10 David told me.</p> <p>11 Q. Okay. I don't have any other questions for you,</p> <p>12 but answer questions that Damon and Evan might</p> <p>13 have for you.</p> <p>14 EXAMINATION</p> <p>15 BY MR. WLODARCZYK:</p> <p>16 Q. Professor Collins, I just have a few I think.</p> <p>17 I'm Damon Wlodarczyk and I represent David Voros.</p> <p>18 And you may have already answered this. Just to</p> <p>19 confirm, have you ever heard David Voros make any</p> <p>20 disparaging comments, either personal or</p> <p>21 professional, about Jaime Misenheimer?</p> <p>22 A. No, I have not.</p> <p>23 Q. And have you heard him make any disparaging</p> <p>24 comments, either personal or professional, about</p> <p>25 Pam Bowers?</p>	<p>1 about professors, staff instructors, etcetera,</p> <p>2 having relationships with students?</p> <p>3 A. There's no -- there's no specific policy. But</p> <p>4 it's just I believe -- it's probably written down</p> <p>5 somewhere, but I'm not aware --</p> <p>6 Q. Okay. Okay. That was the only --</p> <p>7 A. I'm sure there is. You would know more about it</p> <p>8 than I.</p> <p>9 Q. That's fine.</p> <p>10 A. You would know more about it than I.</p> <p>11 Q. That is all I have. Thank you.</p> <p>12 (There being nothing further, the deposition concluded at</p> <p>13 1:55 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1/28/2022

BRADFORD RAY COLLINS

Page 37

## CERTIFICATE

Be it known that I, Kimberly C. Young, do hereby certify that Bradford Ray Collins appeared before me and I took the foregoing deposition at the time and place aforesaid by means of stenomask with backup; that I was then and there a notary public in and for the State of South Carolina and that by virtue thereof, I was duly authorized to administer an oath; and that the witness was by me first duly sworn to testify to the truth, the whole truth, and nothing but the truth.

I further certify that the foregoing transcript represents a true, accurate, and complete transcript of said deposition. This transcript may contain quoted material; said material is transcribed as read or quoted by the speaker.

I further certify that pursuant to Federal Rule 30(f)(1), a review of this deposition was not requested.

I further certify that I am neither employed by nor related to any of the parties in this matter nor their counsel; nor do I have any interest, financial or otherwise, in the outcome of this action.

Witness my hand and seal this 11th day of February, 2022.

/Kimberly C. Young/  
Kimberly C. Young  
Notary Public for South Carolina  
My Commission Expires: 08/14/2030