

EXHIBIT 9

1/28/2022

BRADFORD RAY COLLINS

| | | Page 1 | Page 3 |
|----|-------------------------------------|--|--------|
| 1 | IN THE UNITED STATES DISTRICT COURT | | |
| 2 | DISTRICT OF SOUTH CAROLINA | | |
| 3 | COLUMBIA DIVISION | | |
| 4 | Jaime Susanne Misenheimer,) | 1 Also Present (via phone/video): | |
| 5 | Plaintiff,) | 2 Jaime Misenheimer | |
| 6 | v.) | 3 Pamela Bowers | |
| 7 | University of South Carolina) | 4 | |
| 8 | and David W. Voros, in his) | 5 INDEX | |
| 9 | individual capacity,) | 6 Stipulations 4 | |
| 10 | Defendants.) | 7 Examination by Ms. Albrecht 4 | |
| 11 | | 8 Examination by Mr. Wlodarczyk 34 | |
| 12 | | 9 Reexamination by Ms. Albrecht 35 | |
| 13 | Pamela Jean Bowers,) | 10 Certificate 37 | |
| 14 | Plaintiffs,) | 11 | |
| 15 | v.) | 12 | |
| 16 | University of South Carolina) | 13 EXHIBITS | |
| 17 | and David W. Voros, in his) | 14 (There were no exhibits marked to this deposition.) | |
| 18 | individual capacity,) | 15 | |
| 19 | Defendants.) | 16 | |
| 20 | | 17 | |
| 21 | | 18 | |
| 22 | | 19 | |
| 23 | | 20 | |
| 24 | | 21 | |
| 25 | | 22 | |
| | | 23 | |
| | | 24 | |
| | | 25 | |

| | | Page 2 | Page 4 |
|----|---|--------|--|
| 1 | The deposition of Bradford Ray Collins was taken | 1 | STIPULATIONS |
| 2 | before Kimberly C. Young, a notary public in and for the | 2 | It is stipulated by and between counsel |
| 3 | State of South Carolina, commencing on January 28, 2022, at | 3 | for the respective parties that all objections |
| 4 | the law offices of Cromer Babb Porter & Hicks, 1418 Laurel | 4 | are reserved until the time of trial, except as |
| 5 | Street, Columbia, South Carolina, pursuant to Notice of | 5 | to the form of the questions. |
| 6 | Deposition and/or agreement of counsel. | 6 | This deposition is being taken pursuant to |
| 7 | APPEARANCES | 7 | the Federal Rules of Civil Procedure. |
| 8 | Attorneys for the Plaintiffs: | 8 | ----- |
| 9 | Samantha Albrecht, Esquire | 9 | The reading and signing of this deposition |
| 10 | Elizabeth M. Bowen, Esquire | 10 | is waived by the deponent and counsel for the |
| 11 | CROMER BABB PORTER & HICKS | 11 | respective parties. |
| 12 | 1418 Laurel Street | 12 | Whereupon, |
| 13 | Columbia, South Carolina 29201 | 13 | BRADFORD RAY COLLINS, being duly sworn and |
| 14 | samantha@cbphlaw.com | 14 | cautioned to speak the truth, the whole truth, |
| 15 | beth@cbphlaw.com | 15 | and nothing but the truth, testified as follows: |
| 16 | * * * * * | 16 | EXAMINATION |
| 17 | Attorney for Defendant USC: | 17 | BY MS. ALBRECHT: |
| 18 | Evan M. Gessner, Esquire | 18 | Q. Good afternoon, Mr. Collins. |
| 19 | DAVIS FRAWLEY | 19 | A. Good afternoon. |
| 20 | 140 East Main Street | 20 | Q. My name is Samantha Albrecht. I represent Jaime |
| 21 | Lexington, South Carolina 29072 | 21 | Misenheimer and Pam Bowers in cases they have |
| 22 | evan@oldcourthouse.com | 22 | currently pending against both the University as |
| 23 | * * * * * | 23 | well as David Voros. |
| 24 | Attorney for Defendant David Voros: | 24 | A. Okay. |
| 25 | Damon Wlodarczyk, Esquire | 25 | Q. Can I have you state your full name for the |
| | RILEY POPE & LANEY | | |
| | 2838 Devine Street | | |
| | Columbia, South Carolina 29205 | | |
| | damonw@rplfirm.com | | |
| | * * * * * | | |

1/28/2022

BRADFORD RAY COLLINS

| | | Page 5 | Page 7 |
|----|--|--------|--|
| 1 | record? | | |
| 2 | A. My name is Bradford Ray Collins. | 1 | conversations. But when you see it typed out -- |
| 3 | Q. And, Mr. Collins, have you ever had your | 2 | A. It's crazy. |
| 4 | deposition taken before? | 3 | Q. -- and we interrupt, yes, exactly. It starts to |
| 5 | A. No. | 4 | overlap and it's a little harder to figure out |
| 6 | Q. Okay. Before we get started, I'm going to go | 5 | what it was you were trying to say when you said |
| 7 | through some ground rules as well as my own | 6 | it and I want to make sure your testimony is as |
| 8 | recommendations to try and make this go as | 7 | accurate as possible. Additionally, we have a |
| 9 | quickly and smoothly as possible for everybody. | 8 | tendency to give both nonverbal as well as some |
| 10 | A. Okay. | 9 | unclear answers in our day-to-day lives. We like |
| 11 | Q. First, while I'm the counsel deposing you, I'm | 10 | to nod and shake our head, we say things like uh- |
| 12 | going to ask that if you need me to repeat | 11 | huh or huh-uh. None of that, while I may |
| 13 | anything, you don't understand my question -- | 12 | understand today what you meant, that's not going |
| 14 | A. I will ask you. | 13 | to come across clearly in a written transcript. |
| 15 | Q. -- yeah, you need some sort of clarification, you | 14 | So try and give a verbal response to my |
| 16 | direct those questions to me. | 15 | questions. This isn't a marathon; if you need a |
| 17 | A. I will definitely. I will. | 16 | break at any point in time, just let me know. It |
| 18 | Q. Next, your attorney may object to the form of my | 17 | should not take very long, but if you need a |
| 19 | question, but unless you're specifically told not | 18 | break and we haven't taken one, you just say so |
| 20 | to, I'm still gonna have you answer those | 19 | and we'll take one. Do you understand everything |
| 21 | questions. Those objections -- | 20 | I've gone through thus far? |
| 22 | A. Okay. | 21 | A. So far so good, yeah. |
| 23 | Q. -- are being put on the record, but you go ahead | 22 | Q. Did you do anything to prepare for today's |
| 24 | and just kind of let them finish talking and then | 23 | deposition? |
| 25 | you keep talking unless you're told otherwise. | 24 | A. Not really. I had a brief conversation with Evan |
| | | 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 |
|----|---|--|
| 1 | A. In general, no. In specifics, yes. | 1 A. Her name is Alexandra Mathwig. |
| 2 | Q. Anything out of the ordinary from anybody else's memory? | 2 Q. And then do you have any other immediate family who live in South Carolina who are over the age of 18? |
| 3 | | 3 |
| 4 | A. No. | 4 |
| 5 | Q. Okay. Are you taking any drugs or medications that might interfere with your ability to answer my questions? | 5 A. No. |
| 6 | | 6 Q. Do you attend a church? |
| 7 | | 7 A. No, I do not. |
| 8 | A. No. | 8 Q. Are you involved in any civic organizations? |
| 9 | Q. If at anytime during your deposition you realize an answer you've already given me as either incomplete or incorrect, will you let me know? | 9 A. No, I am not. |
| 10 | | 10 Q. Are you involved in any professional organizations? |
| 11 | | 11 |
| 12 | A. Yes. | 12 A. Yes. |
| 13 | Q. Okay. | 13 Q. What professional organizations? |
| 14 | A. This is -- this is hard talking. This is practice. This takes practice. | 14 A. The College Art Association. |
| 15 | | 15 Q. Is that a national organization? |
| 16 | Q. When I tell people not to interrupt people, people think it's super obvious, right? And then they realize how much we do it in day-to-day conversations and it does become more difficult. | 16 A. It's a national organization. |
| 17 | | 17 Q. Are you on the board or anything like that? |
| 18 | | 18 A. No. I used to be but not now. |
| 19 | | 19 Q. What social media sites do you use? |
| 20 | No, I understand. I apologize. What was -- what is your current address? | 20 A. Google? Is that what you mean? Is that what you mean? |
| 21 | | 21 |
| 22 | A. 1315 Glenhaven Drive in Columbia, South Carolina. | 22 Q. Like Facebook, Instagram? |
| 23 | Q. And how long have you lived there? | 23 A. I do Facebook. Yeah, I do Facebook. Less -- |
| 24 | A. I would say over 20 years. | 24 less than I used to. |
| 25 | Q. What is your date of birth? | 25 Q. So you have a Facebook. |
| | Page 10 | Page 12 |
| 1 | A. December 7, 1942. | 1 A. I have Facebook. |
| 2 | Q. Are you married? | 2 Q. Do you have any accounts with other social media sites? |
| 3 | A. I am married. | 3 |
| 4 | Q. And who are you married to? | 4 A. No, I do not. No. |
| 5 | A. I'm married to Stacey Milner-Collins. | 5 Q. Any Instagram? |
| 6 | Q. And what does your wife do? | 6 A. No, I do not. |
| 7 | A. My work is a yoga teacher. She used to own City Yoga. | 7 Q. I keep telling people I need to update my questions because I have MySpace listed as a possible question. |
| 8 | | 8 |
| 9 | Q. Does she still teach with a studio? | 9 |
| 10 | A. Not -- well, not right now. She's teaching from home until the -- until COVID is over. | 10 A. Whoa. |
| 11 | | 11 Q. But earlier this week someone told me they had a Tik Tok account and I was like, well, that's how |
| 12 | Q. Yup, I understand. Have you been married previously? | 12 |
| 13 | | 13 I know that these questions are really out of date because I just asked you about MySpace and you told me in response that you had a Tik Tok. |
| 14 | A. I have been. | 14 So I'm working on it. Have you posted, commented, talked to anybody on Facebook about |
| 15 | Q. Okay. And does your prior spouse live in South Carolina? | 15 Jaime's lawsuit or Pam's lawsuit or any of the allegations against David Voros? |
| 16 | | 16 |
| 17 | A. She does not. | 17 A. Not to my -- not to my recollection. I mean, you guys have my emails, I'm sure. And you could |
| 18 | Q. Do you have any children who are over the age of 18 who live in South Carolina? | 18 |
| 19 | | 19 correct me on that but it is not -- |
| 20 | A. Yes, I have two. | 20 Q. You're not posting things -- |
| 21 | Q. All right. What are their names? | 21 A. To my best -- |
| 22 | A. Living -- did you say living in South Carolina? | 22 |
| 23 | Q. Yes. | 23 Q. -- on your Facebook -- |
| 24 | A. I have one living in South Carolina. | |
| 25 | Q. What's their name? | |

1/28/2022

BRADFORD RAY COLLINS

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

1/28/2022

BRADFORD RAY COLLINS

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

1/28/2022

BRADFORD RAY COLLINS

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

1/28/2022

BRADFORD RAY COLLINS

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

1/28/2022

BRADFORD RAY COLLINS

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

1/28/2022

BRADFORD RAY COLLINS

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

1/28/2022

BRADFORD RAY COLLINS

Page 37

1 CERTIFICATE

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

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

10 I further certify that pursuant to Federal Rule
11 30(f)(1), a review of this deposition was not requested.

12 I further certify that I am neither employed by
13 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.

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

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

19
20
21
22
23
24
25