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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TARIKH DEMEKPE,

Plaintiff,

vs.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE
UNIVERSITY,

Defendant.

Case No. CV11-1177 DDP (MLG)

Date: November 21, 2011

Time: 10:00 a.m.

Courtroom: 3

Judge: Hon. Dean D. Pregerson

**DECLARATION OF GINGER WILSON
IN SUPPORT OF DEFENDANT CSU'S
MOTION FOR SUMMARY JUDGMENT**

Date of Filing: February 23, 2011

Trial Date: Not Set

I, Ginger K. Wilson, declare as follows:

1. I am the Program Coordinator for the Human Services program in the College of Professional Studies at California State University, Dominguez Hills.

2. CSUDH offers a major in Human Services. It is a single-subject major in an interdisciplinary program combining courses from Child Development, Health Sciences, Leisure Studies, Psychology, Sociology, Anthropology, and other areas. It is similar to a degree in social work. A true and correct copy of the Human Services program description from the CSUDH 2009/2011 Catalog is submitted as CSU Exhibit No. 6.

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1 3. The major offers a set of core courses to provide a broad background of the
2 knowledge and skills needed to help improve the quality of life of those in need, plus
3 electives to provide specialized, in-depth training in an area of concentration chosen and
4 designed by the student. The bachelor's degree in Human Services prepares students
5 for occupations in human service settings, social work, or graduate training.

6 4. To complete the major requirements, a student must have a minimum of
7 120 units, including General Education courses (55 to 62 unit), and required major
8 courses (57 units). A minimum of 40 units must be upper division courses. All courses
9 for the major must be completed with a grade of C or better in order to successfully
10 complete the major.

11 5. The required common core courses for the Human Services major include
12 five Human Services 3-unit courses:

- 13 • HUS 300: Introduction to Human Services
- 14 • HUS 310: Helping and Professional Relationships
- 15 • HUS 400: Case Management
- 16 • HUS 410: Advance Case Management with Special Populations
- 17 • HUS 460: Research Methods for Human Services

18 6. The major also requires 9 units of fieldwork practicum and 21 units of
19 various interdisciplinary courses from other departments. Finally, the major requires at
20 least 4 upper division electives in at least two of the following departments: Child
21 Development, Health Sciences, Human Services, Recreation and Leisure Studies,
22 Anthropology, Psychology, or Sociology.

23 7. The course at issue in this case was HUS 460: Research Methods for
24 Human Services. The CSUDH 2009/2011 Catalog describes this course as follows:
25 "This course is an overview of research methods in human services, including study
26 design, sampling data collection and analysis, statistical techniques and reporting
27 writing. Also included is a critical analysis of published research and examination of
28 relevance of data to decision making."

1 8. Tarikh Demekpe was enrolled in HUS 460 in Spring 2010 and Summer
2 2010. Jorge Escamilla taught that class during both the spring semester and the summer
3 session. In Spring, Demekpe received a "D" in that class, and then after repeating it in
4 Summer, received a "D+." Neither grade is sufficient to complete the major
5 requirement, since a grade of C or better is required for this major.

6 9. In Spring 2010, HUS 460 was offered on Monday evenings from 5:30 to
7 8:45 pm. In Summer 2010, HUS 460 was offered Monday evenings from 5:30 to 8:45
8 pm.

9 10. The CSUDH Grade Appeals procedure requires that informal attempts be
10 undertaken before proceeding to more formal steps. Because I was the Program
11 Coordinator, I was heavily involved in Mr. Demekpe's grade appeal relating to HUS
12 460. As will be described in more detail below, I sometimes served as a conduit of
13 communications between Mr. Demekpe, Professor Escamilla, and the administration.
14 Additionally, when things turned contentious by Mr. Demekpe towards Professor
15 Escamilla, I collected the emails exchanged between them to ensure we had a complete
16 file.

17 11. A true and correct copy of Tarikh Demekpe's August 17, 2010 email to
18 Jorge Escamilla is submitted as CSU Exhibit No. 15.

19 12. A true and correct coy of Mr. Demekpe's August 17, 2010 email to me,
20 and my response, is submitted as CSU Exhibit No. 16.

21 13. When I first learned of Mr. Demekpe's discontent with his grades from
22 HUS 460, I met with him and Jorge Escamilla on August 18, 2010, in an informal
23 attempt to resolve the dispute. Mr. Demekpe was unwilling to talk about the merits of
24 the dispute, but instead accused Prof. Escamilla of discrimination and prejudice. Mr.
25 Demekpe got verbally abusive, such that I requested that he leave the meeting and
26 instead put his concerns in writing.

27 14. A true and correct copy of Mr. Demekpe's August 19, 2010 email to Prof.
28 Escamilla is submitted as CSU Exhibit No. 17, and a true and correct copy of that same

1 item as forwarded to Dean Joshi and me is submitted as CSU Exhibit No. 18.

2 15. Prof. Escamilla prepared a student incident report regarding the August 18,
3 2010 verbal altercation by Mr. Demekpe. He later updated it with notes regarding
4 subsequent contacts with Mr. Demekpe, and emailed that updated incident report to
5 Dean Joshi and me on August 23, 2010. A true and correct copy of that email and the
6 updated report is submitted as CSU Exhibit No. 19.

7 16. On September 17, 2010, Prof. Escamilla emailed to Dr. Joshi and me his
8 proposed response to the grade appeal, also attaching the summer final exam and the
9 course syllabus. A true and correct copy of that email, including its attachments, is
10 submitted as CSU Exhibit No. 24. A true and correct copy of Prof. Escamilla's final
11 response is submitted as CSU Exhibit No. 25.

12 17. As Program Coordinator, I reviewed Mr. Demekpe's submissions, Prof.
13 Escamilla's response, the HUS 460 course syllabus, and other submitted materials. I
14 did not find any substantiation supporting Mr. Demekpe's claim that Prof. Escamilla
15 had treated students differently. I noted that Mr. Demekpe's claim that he attended
16 class regularly and on time to be contradicted by Prof. Escamilla's class attendance
17 records. I did not see any facts substantiating a grade appeal and thus recommended
18 that his grade remain a D+. A true and correct copy of my report, including the
19 transmittal email, sent on September 20, 2010, is submitted as CSU Exhibit No. 26.

20 18. After I issued my recommendation, I continued to receive emails from Mr.
21 Demekpe, either directly from him, or forwarded to me from Prof. Escamilla. They
22 were escalating in tone and very disconcerting to both of Prof. Escamilla and me.

23 19. For example, Mr. Demekpe sent another email to Prof. Escamilla on
24 October 19, 2010; a true and correct copy is submitted as CSU Exhibit No. 29. That
25 email was forwarded to me the next day; a true and correct copy is submitted as CSU
26 Exhibit No. 30.

27 20. As another example, Mr. Demekpe sent another email to Prof. Escamilla on
28 November 11, 2010; a true and correct copy is submitted as CSU Exhibit No. 41. That

1 email was copied to me; a true and correct copy of Prof. Escamilla's reply is submitted
2 as CSU Exhibit No. 42.

3 21. Prof. Escamilla was very concerned about Mr. Demekpe's
4 communications. A true and correct copy of Prof. Escamilla's November 12, 2010
5 email regarding his concerns is submitted as CSU Exhibit 43.


6 22. I was likewise concerned. After receiving another email from Mr.
7 Demekpe on November 12, 2010, I replied, telling him to stop emailing the both of us.
8 A true and correct copy of that email exchange is submitted as CSU Exhibit No. 44. A
9 true and correct copy of Mr. Demekpe's reply is submitted as CSU Exhibit No. 45.

10 23. A true and correct copy of my email directing Prof. Escamilla to print out
11 all of Mr. Demekpe's emails for me is attached as CSU Exhibit No. 46.

12 24. During April 2011, I had some noncontroversial email communications
13 with Mr. Demekpe. A true and correct copy of one such exchange on April 6, 2011 is
14 submitted as CSU Exhibit No. 55.

15 25. Most recently, Mr. Demekpe sent me an email asking me for a letter of
16 recommendation for a job. A true and correct copy of his August 13, 2011 email is
17 submitted as CSU Exhibit No. 56.

18 I declare under penalty of perjury under the laws of the State of California that
19 this declaration is true and correct. Signed on October 12, 2011, at Carson, California.

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21 Ginger Wilson
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PROOF OF SERVICE
Demekpe v. Board of Trustees of the California State University
U.S. District Court Case No.: CV11-1177 DDP (MLG)
OGC No.: 11-0186

I, Jason T. Taylor, declare as follows:

I am employed in the County of Los Angeles, State of California. I am at least 18 years old, and not a party to this action. I am an employee of California State University, Office of General Counsel, whose business address is 401 Golden Shore, 4th Floor, Long Beach, CA 90802-4210.

On **October 17, 2011**, I served the document described as **DECLARATION OF GINGER WILSON IN SUPPORT OF DEFENDANT CSU'S MOTION FOR SUMMARY JUDGMENT** on the interested parties in this action as follows:


Tarikh Demekpe
688 Caliburn Drive, #24
Los Angeles, CA 90001

Plaintiff *In Pro Per*
tdemekpe@toromail.csudh.edu
Tel: (323) 572-1774

☒ **BY MAIL—COLLECTION BOX:** I placed each document in a sealed envelope with postage fully prepaid, in the California State University Office of General Counsel's mail collection box in Long Beach, California, so that following ordinary business practices, the envelope would be collected and mailed on this date. I am readily familiar with this office's business practice for collection and processing of mail. In the ordinary course of business, each document would be deposited with the United States Postal Service on that same day.

☒ **BY E-MAIL:** I served each document on the parties by emailing each document in PDF format to each email address listed above. Each e-mail was successfully sent via CSU's email server.

Signed on October 17, 2011, at Long Beach, California. I declare under penalty of perjury under the laws of the State of California that this declaration is true and correct.



Jason T. Taylor