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10 Attorneys for Defendant Board of Trustees
 11 of the California State University

12 UNITED STATES DISTRICT COURT
 13 CENTRAL DISTRICT OF CALIFORNIA

14 TARIKH DEMEKPE,

15 Plaintiff,

16 vs.

17 BOARD OF TRUSTEES OF THE
 18 CALIFORNIA STATE
 19 UNIVERSITY,

20 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 SUSAN WESTOVER
 IN SUPPORT OF DEFENDANT CSU'S
 MOTION FOR SUMMARY JUDGMENT**

Date of Filing: February 23, 2011

Trial Date: Not Set

21 I, Susan Westover, declare as follow:

22 1. I am an attorney who is licensed to practice in California and am admitted
 23 to the Central District. I am employed as University Counsel at CSU's Office of
 24 General Counsel. I am the attorney handling the defense of this case.

25 2. On July 18, 2011, my office served CSU's request for production of
 26 documents to plaintiff Tarikh Demekpe. A true and correct copy of that request is
 27 submitted as CSU's Exhibit 57.

28 3. On September 5, 2011, plaintiff served his written response to CSU's
 request for production of documents. A true and correct copy of that response, as well
 as the image of the envelope in which it arrived, is submitted as CSU's Exhibit 58.

1 4. Before and after plaintiff served his written response to the request for
2 production, he randomly mailed me six sets of documents he was intending to produce
3 in response to CSU's request for production. A true and correct copy of the first set of
4 documents, including the image of the envelope in which it arrived, is submitted as
5 CSU's Exhibit 59.

6 5. A true and correct copy of the second set of documents, including the
7 image of the envelope in which it arrived, is submitted as CSU's Exhibit 60.

8 6. A true and correct copy of the third set of documents, including the image
9 of the envelope in which it arrived, is submitted as CSU's Exhibit 61.

10 7. A true and correct copy of the fourth set of documents, including the image
11 of the envelope in which it arrived, is submitted as CSU's Exhibit 62.

12 8. A true and correct copy of the fifth set of documents, including the image
13 of the envelope in which it arrived, is submitted as CSU's Exhibit 63.

14 9. A true and correct copy of the sixth set of documents, including the image
15 of the envelope in which it arrived, is submitted as CSU's Exhibit 64.

16 10. Mr. Demekpe also made an informal production of documents earlier in
17 this case, when we met in person to exchange documents and attempt informal
18 resolution of this matter. True and correct copies of the four emails he informally
19 produced to me in person when we met are collectively submitted as Exhibit 65.

20 I declare under penalty of perjury under the laws of the State of California that
21 this declaration is true and correct. Signed on October 12, 2011, at Long Beach,
22 California.

23 
24 Susan Westover

1 **PROOF OF SERVICE**
2 **Demekpe v. Board of Trustees of the California State University**
3 **U.S. District Court Case No.: CV11-1177 DDP (MLG)**
4 **OGC No.: 11-0186**

5 I, Jason T. Taylor, declare as follows:

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

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


13 Tarikh Demekpe
14 688 Caliburn Drive, #24
15 Los Angeles, CA 90001

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

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

26 **BY E-MAIL:** I served each document on the parties by emailing each document
27 in PDF format to each email address listed above. Each e-mail was successfully
28 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.

29 
30 Jason T. Taylor