

1 CALIFORNIA STATE UNIVERSITY  
OFFICE OF GENERAL COUNSEL  
2 Christine Helwick (SBN 057274)  
Susan Westover (SBN 151211)  
3 401 Golden Shore, 4th Floor  
Long Beach, CA 90802-4210  
4 Tel.: (562) 951-4500  
Fax: (562) 951-4956  
5 [swestover@calstate.edu](mailto:swestover@calstate.edu)

6 Attorneys for Defendant Board of Trustees  
of the California State University  
7

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10

11 TARIKH DEMEKPE,

12 Plaintiff,

13 vs.

14 BOARD OF TRUSTEES OF THE  
15 CALIFORNIA STATE  
UNIVERSITY,

16 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 DR. ANUPAMA  
JOSHI IN SUPPORT OF DEFENDANT  
CSU'S MOTION FOR SUMMARY  
JUDGMENT**

Date of Filing: February 23, 2011

Trial Date: Not Set

17  
18  
19 I, Dr. Anupama Joshi, declare as follows:

20 1. In Fall of 2010, I was the Acting Director and Associate Dean of the  
21 College of Professional Studies in CSUDH's School of Health and Human Services.

22 2. Prior to Tarikh Demekpe's submission of a formal grade appeal, I had  
23 received several emails between Mr. Demekpe, Jorge Escamilla, and/or Ginger Wilson,  
24 including those submitted as CSU Exhibit Nos. 17 and 19.

25 3. On August 27, 2010, Mr. Demekpe submitted a grade appeal via email to  
26 me. True and correct copies of that email and its attachment are submitted as CSU  
27 Exhibit 20. The one-page appeal did not specify whether the appeal was directed to the  
28 grade from Spring or Summer 2010. The grounds cited for the appeal were alleged

1 “attendance discrepancies and poor grading methods.” Mr. Demekpe requested that “all  
2 of [his] assignments be evaluated by the board,” but he did not submit any assignments  
3 for review in that email or at any other time.

4 4. In reply to the August 27th email, I sent Mr. Demekpe an email that same  
5 day acknowledging receipt of the grade appeal, and providing a link to the procedures to  
6 be followed. On August 28, 2010, Mr. Demekpe replied, noting that he would be  
7 submitting additional information. A true and correct copy of the August 27-28, 2010  
8 email exchange between us is submitted as CSU Exhibit 21.

9 5. On September 3, 2010, Mr. Demekpe sent me another email and  
10 attachment in support of the grade appeal. Mr. Demekpe’s attachment complained  
11 about his grades from both Spring and Summer, listing the different grades he received  
12 on each of the class assignments. A true and correct copy of that email and its  
13 attachment is submitted as CSU Exhibit No. 22.

14 6. On September 13, 2010, Mr. Demekpe sent me another email and  
15 attachment in support of the grade appeal. The attachment purported to be a letter from  
16 a former student, Celeste Wilson, noting that when she took HUS 460 class in Summer  
17 2009, the instructor offered an extra credit opportunity. The letter was unsigned. A true  
18 and correct copy of that email and its attachment is submitted as CSU Exhibit 23. I  
19 conferred with Ms. Celeste Wilson and learned that she took the course a year before  
20 Mr. Demekpe.

21 7. On or after September 19, 2010, I reviewed the email and attachment from  
22 Prof. Escamilla (Exh. 24). On or after September 20, 2010, I reviewed Ginger Wilson’s  
23 email and attachment (Exh. 26). I also conferred with Mr. Escamilla, who explained to  
24 me his grading criteria and where Mr. Demekpe had lost points. After consideration of  
25 all the facts and evidence before me, I concluded that the grade should not be changed.  
26 On October 11, 2010, I sent my written recommendation on the grade appeal to the  
27 grade appeals board. A true and correct copy of my recommendation is submitted as  
28 CSU Exhibit 27.



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 DR.  
11 ANUPAMA JOSHI 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](mailto: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