

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- x
MARY V. PHILLIPS, :
 :
 :
 Plaintiff, :
 :
 :
 v. : 1:05 CV-00862 (ESH)
 :
 :
 DAVID RUBENSTEIN, et al., :
 :
 :
 Defendants. :
----- x

March 13, 2007
Washington, D.C.

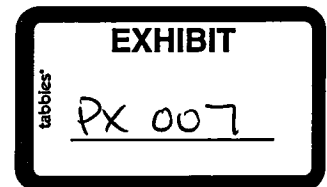
DEPOSITION OF:

SHARON STYLES-ANDERSON

called for oral examination by counsel for the
Defendants, in the offices of Hansen &
Associates, P.C., 419 7th Street, N.W., Suite
201, Washington, D.C. 20004, beginning at 3:50
p.m. on Tuesday, March 13, 2007, before Russell
L. Page, Jr., Court Reporter and Notary Public,
when were present:

ON BEHALF OF THE PLAINTIFF:

CURT S. HANSEN, Esquire
HANSEN & ASSOCIATES
419 7th Street, N.W., Suite 201
Washington, D.C. 20004
(202) 638-6700



1 unique role in dealing with the issues
2 holistically.

3 I do remember them coming to me and
4 expressing concerns about Mary and her not maybe
5 performing in a pure prosecutorial function. I
6 explained to them in my role as senior deputy
7 that I didn't think that their evaluation of her
8 was appropriate, and hence when they tried to
9 bring forth derogatory performance evaluations, I
10 would not approve them or I would challenge them
11 with Mr. Rigsby or Arabella Teal, and I don't
12 have a specific recollection of the issue with
13 the probation officers at all.

14 Q. You said derogatory performance
15 appraisals. Were there instances where they,
16 either David or Dave, prepared derogatory
17 performance appraisals?

18 A. I felt that she was in a position to
19 receive the bonuses that were available to the
20 employees that got exceeds as opposed to meets,
21 and based on what she was doing with respect to
22 the whole family court transition, I felt that

1 she was deserving of a higher evaluation because
2 of the type of work that she was doing, and
3 because, again, they were looking at things, in
4 my view, from a more purely prosecutorial
5 function as opposed to the direction that I felt
6 that the administration was moving, I did not
7 support them.

8 Q. So in doing so, were they directed to
9 revise her performance appraisal?

10 A. Yes.

11 Q. The performance rating that I guess
12 they initially prepared, and the word you used
13 was derogatory, but then I think you sort of
14 adjusted it --

15 A. Yes.

16 Q. -- to use a term that's applicable to
17 performance appraisals.

18 A. Yes.

19 Q. Did you view those lesser performance
20 appraisals that were submitted, did you see that
21 they had a discriminatory animus in them as
22 opposed to just a managerial disagreement or

1 A. Before looking at this, I thought that
2 Dave had something to do with the negative
3 performance evaluation. If he was part of the
4 panel, then I guess he was, but I remember having
5 a conversation at some point with Dave about the
6 fact that Mary should have received a higher
7 rating than what she received and their not
8 evaluating her appropriately.

9 Q. I'm going to ask -- you may not
10 remember, I don't know, and I realize it's been
11 awhile.

12 A. Yes.

13 Q. Dave Rosenthal not evaluating her
14 appropriately, do you know if it was before or
15 after this January 18th? The reason why I say it
16 is because the appraisal that was submitted gave
17 her an exceeds expectations and the panel
18 downgraded her.

19 A. If that's what this says, then that's
20 what happened with respect to this. Now, I don't
21 know if over the two-year period there was more
22 than one, but I recall having a conversation with