

# **EXHIBIT E**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

CAMBRIDGE UNIVERSITY  
PRESS, *et al.*,

Plaintiffs,

v.

MARK P. BECKER, in his official  
capacity as Georgia State University  
President, *et al.*,

Defendants.

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Case No. 1:08-CV-1425-ODE

**DECLARATION OF RACHEL NELMS**

I, Rachel Nelms, do hereby declare under penalty of perjury as follows:

1. My name is Rachel Nelms. I am over the age of 18 and competent to make this declaration. All of the facts stated herein are within my personal knowledge and are true and correct.

2. I am the Administrative Specialist for Curriculum for the College of Arts and Sciences at Georgia State University. My responsibilities include course scheduling and curriculum coordination for the College of Arts and Sciences. As a necessary result of these responsibilities, I have access to the College of Arts and Sciences' records of courses taught and the number of students enrolled in each course.

3. I understand that Plaintiffs in this case have alleged that certain works were used in certain courses that were taught within the College of Arts and Sciences during Maymester 2009, Summer 2009, and Fall 2009.

4. I have reviewed the College of Arts and Sciences courses Plaintiffs allege were taught during Maymester 2009, Summer 2009, and Fall 2009. I have checked each such course against the College of Arts and Sciences' enrollment records to determine whether it was actually taught. As set forth with specificity below, some of the courses identified in Plaintiffs' allegations were never taught. Further, some of Plaintiffs' allegations appear to incorrectly identify certain courses. I provide below what I believe to be the correct course information.

5. According to the enrollment records of the College of Arts and Sciences, the following courses identified in Plaintiffs' allegations as being taught in Maymester 2009 were not taught in Maymester 2009:

<b>Course ID</b>	<b>Course Name</b>	<b>Professor</b>
AL4011	Applied Linguistics	Linda Grant
AL8330	Intercultural Communication	Gayle Nelson
AL8470	Applied Linguistics	Joan Hildenbrand
AL8530	Issues in Second Language Writing	Diane Belcher
AL8900 Practicum	Teaching ESL	Jennifer Burke
ENGL3280	English Drama Hamlet	James Hirsh
HIST4780	Middle East History, 600-1800	Isa Blumi
JOUR4780	Women and Media	Marian Meyers
PERS2001	Perspectives	Larry Youngs

PHIL2050	Philosophical Thinking	Sandra Dwyer
PHIL4060	Kant	Melissa Merritt
PHIL8060	Aesthetics and Teleology in Kant's Critique	Melissa Merritt
POLS8228	Comparative Party System Development	Carrie Manning
POLS8471	Military Conflict and International Security	John Duffield
PSYC8230	Program Evaluation in Community Psychology	Gabriel P. Kuperminc

6. In their allegations for Maymester 2009, Plaintiffs identified a course titled "POLS443 – International Political Economy" taught by Professor Hankla. I believe this may have been a typographical error, as the College of Arts and Sciences does not offer any such course. The College of Arts and Sciences does, however, offer POLS4430, which is titled "International Political Economy." Assuming Plaintiffs intended to identify POLS4430 taught by Professor Charles Hankla, that course was not taught during Maymester 2009.

7. In their allegations for Maymester 2009, Plaintiffs identified four courses as having been taught in Maymester 2009: "COMM4750 – Film Theory and Criticism" taught by Professor Alessandra Raengo, "Film1010 – Film Aesthetics and Analysis" taught by Professor Kristopher Cannon, "MUS8860 – Romantic Period 1800-1900" taught by Professor Nathaniel Lee Orr, and "SOCI3216 – Gender and Society" taught by Professor Marni Khan Brown. These professors did not teach these courses in Maymester 2009.

8. Instead, FILM1010 (Cannon), MUS8860 (Orr), and SOCI3216 (Brown) were taught in Summer 2009. Professor Raengo taught FILM4750 (rather than COMM4750) in Summer 2009. The College of Arts and Sciences does not offer any course identified as COMM4750.


9. According to the enrollment records of the College of Arts and Sciences, the following courses identified in Plaintiffs' allegations as being taught in Fall 2009 were not taught in Fall 2009:

<b>Course ID</b>	<b>Course Name</b>	<b>Professor</b>
AL8500	Pragmatics and Language Teaching	Lucy Pickering
HIST4540	Britain, Ireland, and the British Atlantic 1500-1700	Jacob Selwood
WST4830	Class Matters	Juliana Kabala
WST8004	Feminist Methodologies	Susan Talburt

10. In their allegations for Fall 2009, Plaintiffs identified a course titled "SOCI3030 – Social Theory" taught by Professor Harvey. I note that the proper title for SOCI3030 is "Sociological Theory." I also believe that Plaintiffs' identification of SOCI3030, taught by Professor Harvey in Fall 2009, may have been a typographical error, as Professor Harvey did not teach SOCI3030 in Fall 2009. Professor Adia Harvey did, however, teach SOCI8030, which is titled "Sociological Theory I," in Fall 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 10, 2011

  
Rachel Nelms