UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

CAMBRIDGE UNIVERSITY PRESS, et al.,

Plaintiffs,

Civil Action File No.1:08-CV-1425-ODE

v.

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

Defendants.

NOTICE OF INTRODUCING DEPOSITION TESTIMONY

Plaintiffs give notice of introducing the testimony listed below by video in

open court on the dates listed below. Said testimony was introduced for purposes

of impeachment.

May 23, 2011

Paula Christopher [Docket No. 168]

- 1. Page 159 line 17 through page 160 line 4; and
- 2. Page 112 line 19 through page 113 line 1.

Jodi Kaufmann [Docket No. 173]

1. Page 57 lines 12 through 14;

- 2. Page 57 lines 12 through 25;
- 3. Page 65 line 23 through 66 line 2; and
- 4. Page 93 lines 4 through 19.

May 24, 2011

Jennifer Esposito [Docket No. 321]

- 1. Page 88 line 8 through page 89 line 11; and
- 2. Page 62 lines 10-14.

May 27, 2011

Margaret Moloney [Docket No. 330]

- 1. Page 82 lines 13 through 23; and
- 2. Page 98 line 4 through 99 line 2.

May 31, 2011 – June 1, 2011

John M. Murphy [Docket No. 331]

- 1. Page 48 lines 6 through 12;
- 2. Page 28 lines 13 through 19;
- 3. Page 29 lines 3 through 5;
- 4. Page 32 lines 9 through 17;
- 5. Page 33 line 13 through 34 line 16; and
- 6. Page 34 lines 21 through 23;

June 1, 2011

John Duffield [Docket No. 320]

1. Page 72 line 22 through 73 line 14

Respectfully submitted this 1st day of June, 2011.

<u>/s/ John H. Rains IV</u> Edward B. Krugman Georgia Bar No. 429927 John H. Rains IV Georgia Bar No. 556052

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing NOTICE OF

INTRODUCING DEPOSITION TESTIMONY with the Clerk of Court using

the CM/ECF filing system which will send e-mail notification of such filing to

opposing counsel as follows:

Stephen M. Schaetzel, Esq. John W. Harbin, Esq. Natasha H. Moffitt, Esq. Kristen A. Swift, Esq. C. Suzanne Johnson, Esq. Mary Katherine Bates, Esq. KING & SPALDING 1180 Peachtree Street Atlanta, Georgia 30309

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Mary Jo Volkert, Esq. Assistant State Attorney General 40 Capitol Square Atlanta, Georgia 30334 This 1st day of June, 2011.

/s/ John H. Rains IV John H. Rains IV