

EXHIBIT B

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

CAMBRIDGE UNIVERSITY)
PRESS, et al.,)
)
Plaintiffs,)
)
vs.) Civil Action File
) No. 1:08-CV-1425-ODE
MARK P. BECKER, in his)
official capacity as)
Georgia State University)
President, et al.,)
)
Defendants.)

- - -

Videotaped deposition of LAURA G. BURTLE,
taken on behalf of the plaintiffs, pursuant to the
stipulations contained herein, before Sharon A.
Gabrielli, RPR, CCR No. B-2202, at 104 Marietta Street,
6th floor, Room 3, Atlanta, Georgia, on Friday, April
24, 2009, commencing at the hour of 9:13 a.m.

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1 been used in course EPY 7090, the Psychology of
2 Learning of Young Children, in spring 2009 taught by
3 Flexner, Kruger, and Lederberg?

4 MR. ASKEW: I'll object to the form of
5 that question. I don't think there's a
6 foundation for that question with this
7 witness, and I don't know how this witness
8 would know whether that document was used in
9 this class or not. All this witness knows is
10 what is reported on this form.

11 MS. SINGER: Okay.

12 MR. ASKEW: We went through this a lot
13 yesterday, and I felt like at one point that
14 we really needed to stop and see if we
15 couldn't just have some sort of an agreement
16 that the witness is allowed to tell you that
17 these items are on the form. But you can ask
18 her, but I seriously doubt that she's going
19 to know whether that actual document was
20 actually used in that class. It would be
21 beyond what she would know. She can tell you
22 it's on the form. She can probably you tell
23 you that she has no reason to believe that
24 the form is inaccurate, but all she's going
25 to be able to tell you is that this document

1 appears in that report --

2 MS. SINGER: All right. I appreciate --

3 MR. ASKEW: -- and the data's there.

4 MS. SINGER: I appreciate your position.

5 MR. ASKEW: And if you'd like to maybe
6 go through and just identify the various
7 items that you would like to have that
8 acknowledgement made, I think we could do
9 that, maybe it could speed things up; but
10 beyond that, I don't know what else she can
11 tell you.

12 MS. SINGER: I appreciate your position.
13 I'm going to go ahead and ask my questions
14 because it's my deposition.

15 Q (BY MS. SINGER) So on page 7, entry 15a),
16 it's the second entry on page 17 of P-77, we see that
17 this excerpt from the Oxford Unity -- University Press,
18 Awakening Children's Minds, is listed as being used in
19 course EPY 7090, the Psychology of Learning of Young
20 Children, in spring 2009. Do you see that?

21 A Yes.

22 Q Do you have any reason to believe that
23 that -- that excerpt was list -- not listed for that
24 course?

25 A No.