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1 **expectations for students with disabilities. That's**  
2 **what I mean by forward thinking.**  
3 Q. And this was the beginning of the Transitions  
4 programs?  
5 **A. I don't know what it was called then, truthfully. It**  
6 **was run through Rochester School District, although**  
7 **not at that point. It was still, you know, brewing,**  
8 **but it was a transition service. Whether or not it**  
9 **was given that name, truthfully, I don't know.**  
10 Q. Were you involved in the development of the Options  
11 program?  
12 **A. Well, in that, I was -- I had a few -- a couple of**  
13 **meetings over those next couple of years sharing**  
14 **information, talking about what was being done**  
15 **nationally. I think it then eventually became much**  
16 **more of an organized group to develop a new program**  
17 **that Oakland University would run, which was different**  
18 **than the first, what, two or three years prior to**  
19 **that. So I think I attended one meeting only because**  
20 **I was meeting with Bob after that meeting, so...**  
21 Q. Bob Wiggins?  
22 **A. Yeah, I'm sorry. Yeah, Dr. Wiggins.**  
23 Q. Okay. What was that meeting about?  
24 **A. The meeting around the formation of a new program,**  
25 **that meeting?**

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1 Q. Well, why were you meeting with Dr. Wiggins to begin  
2 with?  
3 **A. Oh, I was coordinating a conference, a symposium on**  
4 **post-secondary education. I was hired by the**  
5 **Developmental Disabilities Institute at Wayne State**  
6 **University to organize a symposium bringing in some of**  
7 **the national leaders as well as local people. So at**  
8 **that point -- and Oakland University was one of the**  
9 **members of the advisory group that we had established**  
10 **to help create the symposium. So I was meeting with**  
11 **him to talk about that.**  
12 Q. Okay. And then you also attended a meeting regarding  
13 Options?  
14 **A. Yeah, because the meeting was happening prior to our**  
15 **meeting and they said, you know, why don't you come**  
16 **in.**  
17 Q. And when was this, do you recall?  
18 **A. That's going to take a little bit of work. You know,**  
19 **I'm guessing it would be -- I'm not very -- 2000**  
20 **and -- - end of 2007, something like that. It would**  
21 **have to be before the symposium. And I know you're**  
22 **going to ask me when the symposium was, but I'm not**  
23 **exactly sure when that was.**  
24 Q. Let's have as a date, a benchmark, the -- your son --  
25 **A. Oh, right.**

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1 Q. -- was trying to get into housing in the fall of '07.  
2 **A. Yes.**  
3 Q. That's when he applied, for the winter of '08.  
4 **A. Right, correct.**  
5 Q. Okay. Does that help you put it in the time-frame?  
6 **A. Yeah. So let's see, the symposium must have been --**  
7 **I'm really drawing a blank.**  
8 Q. Okay. Who else was present at the meeting?  
9 **A. I know that there was a faculty person from Oakland**  
10 **Community College. I remember sitting across -- a**  
11 **male. I don't know his name. My memory's not that**  
12 **good. Maybe Oakland -- I'm guessing there was someone**  
13 **from Oakland Schools and probably community mental**  
14 **health, but I don't know.**  
15 Q. How long was the meeting?  
16 **A. Well, I was only there for about 45 minutes.**  
17 Q. What was discussed while you were there?  
18 **A. I think it was more about cri -- I think it was about**  
19 **criteria, who would be allowed to enter the -- the**  
20 **program or programs, whatever they might be.**  
21 Q. Do you know what criteria they were discussing?  
22 **A. No. I don't recall now.**  
23 Q. Did your son meet all the criteria for being an  
24 Options student?  
25 **A. I assume so. I -- he was a paying member so...**

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1 Q. Has he completed high school?  
2 **A. He's still under the auspices. This is -- I feel**  
3 **vague about this. He has -- he can receive services**  
4 **until he's the age of 26. He does have a certificate**  
5 **of completion, as far as I understand. There is this**  
6 **sort of diploma-looking certificate he has.**  
7 Q. You can still -- one can still receive services after  
8 receiving a certificate of completion?  
9 **A. Well, I -- I question -- I -- I don't know. But I**  
10 **know that he's doing -- I know that he's still, you**  
11 **know, on the -- he's still under the auspices, is the**  
12 **way I see it, of Berkley High School.**  
13 Q. What services do they provide?  
14 **A. He has an IEP, an individual educational plan. He**  
15 **meets with his teacher, Sharon Berke, who's sort of**  
16 **the coordinator of that, of his services. They**  
17 **identify what goals he'll work on, assist with that.**  
18 **If there are additional services needed, he would --**  
19 **you know, he could be, you know, assessed as to**  
20 **whether or not that's needed. So it's sort of, like,**  
21 **a -- in my understanding, a coordinator of services.**  
22 Q. Do they provide any financial support?  
23 **A. No.**  
24 Q. Do the -- the person that you dealt -- deal with at  
25 Berkley is Sharon Berke you said?

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1 time?

2 **A. It was a brand new program, similar sort of features.**

3 Q. That it was a pilot?

4 **A. I don't know if I had that sense of it was a pilot. I**

5 **mean, he had -- he was on campus. He had been on**

6 **campus, so it didn't feel new to us because he was**

7 **moving.**

8 Q. Was he already in class in September, attending

9 classes in September when you got word that he could

10 apply to housing, do you know?

11 **A. Oh, he -- I would guess. I remember we sat the first**

12 **day of the Options program when we met with Bob**

13 **Wiggins and maybe Leeann and got the classes. They**

14 **needed some help in terms of finding faculty because**

15 **it was -- Leeann had just started, so we got -- I**

16 **remember that meeting. And then -- you know, after**

17 **that meeting, maybe, I don't know, a couple months or**

18 **so maybe, he -- he actually knew that he could apply.**

19 Q. Why didn't he apply for housing in the fall?

20 **A. Well, it was a -- this was the first time he --**

21 **everything -- every step of the way was -- was new. I**

22 **mean, they -- this was the first time we were having**

23 **to pay tuition. So it was like everything was**

24 **unfolding and plus I guess now the idea was that I**

25 **don't think he could apply for the winter until after**

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1 the -- you know, until after students got into the

2 program.

3 Q. Why is that?

4 **A. Well, somehow the idea that they were just getting**

5 **students in for the fall and then they would know.**

6 **What we learned is that -- because in my mind, I**

7 **remember thinking, well, he's not going to be able to**

8 **move in, because there won't be any spaces available,**

9 **right, because I was naive enough to just think kids**

10 **would go the whole year. So I remember being informed**

11 **that some of the kids will drop out, so there will be**

12 **spaces. And so I remember being informed, instructed**

13 **about that.**

14 Q. Okay. And you understood that the regularly enrolled

15 students would have priority rights to dorm rooms?

16 **A. I don't -- there was some discussion about that. It**

17 **was confusing to me. So I don't know what -- what I**

18 **just remember is -- sorry to sound like I'm repeating**

19 **myself -- is that Micah could apply for the winter**

20 **because there will be space available and he now --**

21 **and we now are paying tuition. That was the -- that**

22 **was the basic information that I needed to know as a**

23 **parent.**

24 Q. Okay. So at some point, he applied for housing,

25 correct?

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1 **A. Uh-huh.**

2 Q. Were you involved in the completion of that form?

3 **A. I think he did that with a friend. He was very proud**

4 **and didn't want us to be involved in it and we**

5 **supported that 100 percent. I think he wrote -- if I**

6 **remember correctly, you know, he has a distinct**

7 **handwriting, and he put his name on the application,**

8 **and then filled it out with a friend.**

9 Q. Are you comfortable with him signing contracts?

10 **A. Absolutely. I'll tell you why. Because he is very**

11 **cautious and will ask the help of, you know,**

12 **appropriate people, if he has a question. It's a**

13 **great skill he has.**

14 Q. All right. So he completed the contract. What

15 happened next in regard to the housing issue? You

16 said you had a phone call from Roxanne about meal

17 plans?

18 **A. Right. So he went to -- so I said, you know,**

19 **really -- usually what I say when people ask us**

20 **questions is either here's Micah's cell phone number**

21 **or I -- call the home phone number and I won't pick up**

22 **on the answering machine. You can leave him a**

23 **message. So that's standard protocol, if you will, at**

24 **our home. Then he -- what I remember is that he and**

25 **Kim went to the housing department, I guess, or office**

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1 to learn about the meal plan and to select. And I

2 think he talked to -- because just as she started

3 talking, it was certainly different kinds of meal

4 plans than what I had when I went to school. It was

5 very complicated in my mind. So he also talked to

6 some of his friends who are living in the dorm to say,

7 you know, what should I do here. So he was getting

8 the information he needed to make a good decision.

9 Q. What was Kim's involvement?

10 **A. I think to learn what he was learning about.**

11 Q. Okay. What happened next with regard to housing, to

12 your recollection?

13 **A. I think he picked a -- as far as I know, he picked a**

14 **plan and then I either got a letter or an e-mail**

15 **indicating that his move-in date was the 6th, I think,**

16 **of January, 2008.**

17 Q. After receiving that, what was the next thing that

18 happened?

19 **A. On the morning of the PCP or IEP -- I think it's a**

20 **PCP, the PCP, I'm pretty sure we got an e-mail from**

21 **Dr. Wiggins, it was fairly early in the morning,**

22 **indicating that there was some issue and Micah would**

23 **not be able to move into the dorm on January 6th.**

24 Q. What was your understanding as to what the reason was?

25 **A. I don't think I under -- was given a reason. I think**

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1 **I remember seeing the word policy, a policy or**  
2 **something like that.**  
3 Q. Did you have any further communication after receiving  
4 that e-mail?  
5 **A. Not that I recall. We knew we were going to be at the**  
6 **meeting that -- later that afternoon.**  
7 Q. Okay. Where was that meeting?  
8 **A. At Oakland University, the student center on the lower**  
9 **level.**  
10 Q. Who was present at that meeting?  
11 **A. Dr. Wiggins probably -- I'm not sure if Sharon Berke**  
12 **was there or not. There was one she wasn't able to**  
13 **attend. I mean, if you have the form -- but he had**  
14 **several of his friends, a couple neighbors.**  
15 **Obviously, Mike, who's nicknamed Buddha was there,**  
16 **because that was where the idea of staying one night**  
17 **came. Maybe two people from MORC, couple other**  
18 **students, maybe Jean Ann Miller. I'm not sure. Maybe**  
19 **Sandy Laham was there.**  
20 Q. Who's that?  
21 **A. I mentioned her earlier. She teaches at Oakland**  
22 **University. Richie and me.**  
23 Q. Any Oakland University administrators?  
24 **A. I don't know if Jean Ann Miller is considered an**  
25 **administrator, and I think she was there, but I don't**

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1 **know. I'd have to review the record.**  
2 Q. Okay. Dr. Wiggins?  
3 **A. Uh-huh.**  
4 Q. He was there?  
5 **A. Yes, absolutely.**  
6 Q. Okay. Was the housing issue discussed during that  
7 meeting?  
8 **A. Yes.**  
9 Q. Okay. And other than the fact that Buddha volunteered  
10 to have Micah stay at his place, what else was  
11 discussed?  
12 **A. Well, I remember one of the students saying this**  
13 **doesn't have to be the end. How about if we write**  
14 **some letters. Micah should be able to be in the dorm**  
15 **and Micah said that was a good idea. So there was a**  
16 **spirit of let's keep looking at this, you know,**  
17 **options. And -- yep. There were other issues talked**  
18 **about, but that was -- that's -- let's continue to**  
19 **have conversations was sort of the theme.**  
20 **MARKED BY THE REPORTER:**  
21 **DEPOSITION EXHIBIT 2**  
22 **11:57 a.m.**  
23 **BY MR. BOONIN:**  
24 Q. Were you aware of any explanation or rationale for the  
25 university's decision at that time, was that

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1 discussed?  
2 **A. I don't recall that.**  
3 Q. Okay. What happened next?  
4 **A. Well, I know that Micah met with some of his friends**  
5 **and -- about this idea of letter writing and getting**  
6 **supporting letters, documentation that Micah is**  
7 **capable from the student's perspective. And then he**  
8 **got letters from adults, you know, people with**  
9 **credibility who knew of him, would speak to his**  
10 **ability to live in a dorm. I think Rich had a couple**  
11 **of conversations with Bob, Dr. Wiggins, about, you**  
12 **know, what's -- how do we continue to -- how do we**  
13 **keep the conversation going so that we can look at**  
14 **what is needed to move this forward.**  
15 Q. What's your understanding as to what they discussed,  
16 little more detail?  
17 **A. You mean Rich and Dr. Wiggins?**  
18 Q. Yes.  
19 **A. That -- well, I think Rich -- I wasn't there, so I**  
20 **don't know. What I know is that Micah wanted to**  
21 **continue to try to have conversations with people so**  
22 **that this could be looked at. You know, sometimes**  
23 **people aren't -- because he wanted to live in the**  
24 **dorm.**  
25 Q. Now, he did receive a letter from Mr. Maten at some

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1 point, didn't he?  
2 **A. I know he got one from, you know, Mary Beth Snyder.**  
3 Q. Do you recall receiving one from Mr. Maten saying that  
4 his -- he's not eligible to be in the dorms?  
5 **A. That sounds reasonable. I don't remember that letter,**  
6 **but that sounds reasonable.**  
7 Q. And that was because he wasn't registered as a student  
8 for the winter term, do you recall that in the letter?  
9 **A. It's reasonable. I don't remember the letter.**  
10 Q. Do you recall that being the reason the university was  
11 denying him the ability to be in the dorms?  
12 **A. No, I don't. I recall that -- I mean, at that point,**  
13 **he was his -- see, in my mind, he was accepted into**  
14 **the dorm. So we -- that's what we knew. So it didn't**  
15 **make sense that he all of a sudden wasn't.**  
16 Q. And what was your understanding as to what the  
17 university's reasons were or not?  
18 **A. I didn't understand them.**  
19 Q. Well, what was the -- I'm not saying whether you  
20 understood them or not, but what was the university  
21 telling you at that time?  
22 **A. At that time, I don't know. Eventually, I don't -- I**  
23 **don't know. I don't remember. I'm sorry. I don't**  
24 **remember.**  
25 Q. Okay. Before you is a document marked Exhibit 2,

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1 which, Counselor, is the same as Exhibit 4 in  
2 Mr. Feldman's deposition. It's a series of e-mails.  
3 **A. Okay. Do you want me to read them, is that --**  
4 **Q. Well, do you recognize it?**  
5 **A. This one?**  
6 **Q. Okay.**  
7 **A. I remember that one.**  
8 **Q. The first one?**  
9 **A. Uh-huh.**  
10 **Q. Do you recognize the other e-mails here that are**  
11 **between your husband and Professor Wiggins?**  
12 **A. That one looks -- the second one looks familiar. Do**  
13 **you want me to give you a date or are you following**  
14 **along?**  
15 **Q. I'm just asking you if the others look familiar or**  
16 **not. Did your husband share these with you when they**  
17 **were received?**  
18 **A. Sometimes he would. Sometimes I would choose not to**  
19 **read them just so I wouldn't get so upset, you know.**  
20 **This was a big thing to Micah. Overall, we stayed in**  
21 **close communication.**  
22 **I remember that. Uh-huh. I guess I'm**  
23 **reading too fast. I don't see registered student in**  
24 **this.**  
25 **Q. I'm not suggesting that it's in this document.**

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1 **A. Oh, okay. Uh-huh, I remember this. Uh-huh, and --**  
2 **yes, okay. This is Lionel Maten is still willing to**  
3 **meet with me to discuss this. I will keep the issue**  
4 **on the table.**  
5 **Q. There's a statement on one two -- on the fourth page,**  
6 **the last paragraph, where he says he found out --**  
7 **here's the quote, it has been university practice for**  
8 **some time that the dorm facilities are restricted to**  
9 **students who are pursuing a degree.**  
10 **A. Uh-huh.**  
11 **Q. Do you recall hearing that yourself?**  
12 **A. I eventually did hear that. Degree-seeking student**  
13 **was the term.**  
14 **Q. Okay. Do you have -- are you aware of any facts that**  
15 **would suggest that Dr. Wiggins' statement here is not**  
16 **true?**  
17 **A. We were told by a couple of students that some of the**  
18 **students were -- and were -- were foreign students,**  
19 **students from outside the United States, who are not**  
20 **degree seeking who are living in the dorm.**  
21 **Q. Okay. Who told you that?**  
22 **A. One of the students who was from another country,**  
23 **perhaps Turkey. I'm not sure.**  
24 **Q. A student told you that herself?**  
25 **A. Yes, uh-huh.**

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1 **Q. Do you recall her name?**  
2 **A. It was a male name. Male in our -- Dennis maybe, but**  
3 **I don't remember a last name.**  
4 **Q. When was this?**  
5 **A. Well, it was during this period after --**  
6 **Q. How did you know this person?**  
7 **A. She was a student who met Micah through another**  
8 **student.**  
9 **Q. How old was she?**  
10 **A. I assume she was college age. I don't know.**  
11 **Q. Do you know why she was here?**  
12 **A. No, I -- studying, that's what I know.**  
13 **Q. Okay. Do you know where she is now?**  
14 **A. Back in her home country. At least that's the last I**  
15 **knew of her.**  
16 **Q. Did she go back to go to college in her home country?**  
17 **A. I don't know.**  
18 **Q. Do you know if she was enrolled in college when she**  
19 **was here?**  
20 **A. Well, I -- she told me that she was not a**  
21 **degree-seeking student, so...**  
22 **Q. At Oakland University?**  
23 **A. Correct.**  
24 **Q. Do you know if she was enrolled in college in Turkey?**  
25 **A. I don't know. No, the impression she gave me is I'm**

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1 **not a degree-seeking student, but that's --**  
2 **Q. How long was she in the United States?**  
3 **A. I don't know. Maybe for a semester or two.**  
4 **Q. Do you know why?**  
5 **A. She was studying. That's as much as I know.**  
6 **Q. Do you have any other facts that you believe would**  
7 **suggest that what Dr. Wiggins is saying in this e-mail**  
8 **is not true?**  
9 **A. There was some discussion about the office that**  
10 **supports students who are from other countries who**  
11 **come to Oakland University to learn. So there was**  
12 **information that was shared with -- you know, Rich or**  
13 **Micah that said you do not have to be a degree-seeking**  
14 **student to live in the dorm. And then there was a**  
15 **memo that was later on distributed to staff, which**  
16 **said there will no longer be -- students who are from**  
17 **other countries will no longer be able to live in the**  
18 **dorm. That was what was told to us from -- somehow**  
19 **through faculty. So it -- it gave the impression to**  
20 **us that students who were not degree-seeking students**  
21 **were living in the dorm.**  
22 **Q. Have you ever seen that document, that memo?**  
23 **A. I don't recall.**  
24 **Q. Do you have a copy of it?**  
25 **A. Do I have a copy of it?**

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1 Q. Does he live in a cabin with other campers?  
2 **A. Uh-huh.**  
3 Q. Is that a yes?  
4 **A. Yes. Oh, I'm sorry. Yes. Yes.**  
5 Q. Okay. And how old are the other campers?  
6 **A. You know, I don't know. How old is he, 20? Some of**  
7 **them are his age.**  
8 Q. So after the summer, he still wants to live in the  
9 dorms, so now we're -- are we in August?  
10 **A. Yes. Yes.**  
11 Q. Okay. What happens next?  
12 **A. So then we felt that we wanted to go directly to**  
13 **Dr. Snyder to let her know that Micah really wanted to**  
14 **pursue that. So we talked with Micah about you've met**  
15 **with, you know, Dr. Snyder. Are you okay with us**  
16 **meeting with her. And he says yeah, and I said will**  
17 **you come with us. And he says why don't the two of**  
18 **you go. So we respected that and went and met with**  
19 **her at -- to indicate to her -- to try to, you know,**  
20 **clarify once again, because it still was unclear to us**  
21 **what this meant, because he was paying tuition, he had**  
22 **moved into the -- his application was expected --**  
23 **accepted. He was given a date. All -- all indicators**  
24 **were -- for us meant that he was moving into the dorm.**  
25 **It did not make sense to us. So we wanted to be clear**

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1 **about it. We wanted her to understand our situation**  
2 **and make sure that there wasn't misunderstandings. I**  
3 **mean, we -- I mean, I make a living at trying to**  
4 **negotiate issues, so I respect the need to have**  
5 **conversations with people.**  
6 Q. Did she tell you that his acceptance of his  
7 application was a mistake?  
8 **A. I don't recall her ever using that word, mistake.**  
9 Q. What did she say?  
10 **A. Well, within two minutes, she said he's not moving in**  
11 **the dorm. She handed us a form, the housing**  
12 **application form, which we assumed was the one that**  
13 **Micah had signed. And indicating that here's the**  
14 **policy, it's on the back. Read it.**  
15 Q. Isn't it true she didn't have a form at that meeting?  
16 **A. We left -- no, that's not true. We did -- she sent us**  
17 **a form ahead of time so that we would review it. She**  
18 **handed the form. She had the form in front of us and**  
19 **we said, as I remember it, you did send us the form.**  
20 **Thank you for sending us that form.**  
21 Q. Okay. So did she explain any further why he was not  
22 eligible to live in the dorms?  
23 **A. I think that's when I began to hear that word**  
24 **degree-seeking student.**  
25 Q. Okay.

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1 **A. And, yeah. So that's...**  
2 Q. Anything else said during that meeting?  
3 **A. We had a conversation about, you know, how much**  
4 **everybody had grown because of Oakland's willing --**  
5 **you know, openness to have students with cognitive**  
6 **disabilities on the campus.**  
7 Q. You understood that Oakland didn't have an obligation  
8 to have the Options program at all, correct?  
9 **A. An obligation? Is it a requirement by law? No, it's**  
10 **not a requirement.**  
11 Q. Okay. And you were appreciative of the fact that  
12 Oakland created this program?  
13 **A. Always been very public about that. I've always been**  
14 **very public.**  
15 Q. You want that program, though, to include housing?  
16 **A. Pardon me?**  
17 Q. But you want that program to include housing?  
18 **A. Well, that was what we all talked about from the**  
19 **beginning, to have the full college experience. I**  
20 **mean, from, you know, once the issue of housing became**  
21 **on the table.**  
22 Q. And you were hoping that Dr. Snyder would waive the  
23 requirement that students be pursuing degrees as a  
24 condition for being in the housing?  
25 **A. I -- I can't say that it was about waiving a**

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1 **requirement. It -- it was not -- it wasn't a**  
2 **requirement by action. Micah had been accepted to**  
3 **live in the dorm and we were paying tuition. So we --**  
4 Q. You were paying tuition, but that doesn't cover  
5 housing.  
6 **A. No. And that's why it was clearly stated we would pay**  
7 **the housing, and that was -- there was not going to be**  
8 **any -- there was discussions of that at various**  
9 **points, that, you know, the schools wouldn't pay for**  
10 **it, the Options program wouldn't pay for it. The**  
11 **parents would have to pay for it.**  
12 Q. And Dr. Snyder decided that -- gave you the -- told  
13 you that he was not eligible to live in housing?  
14 **A. Based on her -- yes. Based on her understanding,**  
15 **based on this new form that she gave us or different**  
16 **form, let me say, than what Micah had signed.**  
17 Q. Did she ever indicate that the policy was changing?  
18 **A. That it was changing, no. That it was changing, I'm**  
19 **not sure I know what that means. I'm sorry.**  
20 Q. Did she ever indicate that it -- the policy used to be  
21 something other than you had to be an enrolled student  
22 pursuing a degree?  
23 **A. No, I was led to believe that he had signed a form**  
24 **that was an accurate statement of their policy.**  
25 Q. How long did that meeting last?

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1 **A. I think we were told within the first two minutes, and**  
2 **I only know that because I was looking at the clock,**  
3 **but then we continued to have conversation for**  
4 **probably about another 40 minutes, something like**  
5 **that.**  
6 Q. Do you recall anything else about the meeting other  
7 than what you've already testified to?  
8 **A. Do I know -- remember anything else?**  
9 Q. Yes.  
10 **A. Can I take a break? Can I talk to --**  
11 MR. DAVIS: You have to answer a question  
12 while it's posed.  
13 THE WITNESS: Okay. Well, here's the part  
14 I remember that was very frustrating to me was that  
15 Mr. Maten had said that the reason that Micah wanted  
16 to live in the dorm was because he wanted to learn how  
17 to cook. And I looked at him and I said to him, then  
18 he wouldn't move into a dorm, because you don't cook  
19 in a dorm. So maybe a minor point to you, but it was  
20 a frustrating point to a parent.  
21 BY MR. BOONIN:  
22 Q. Anything else?  
23 **A. We wanted her to know that, again, we respected what**  
24 **she did, and that Micah would make a decision based on**  
25 **what he wanted to do next.**

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1 Q. What happened next with regard to the housing issue?  
2 **A. Well, we met with -- I mean, not met. We -- you know,**  
3 **we talked with Micah saying that she said no to us as**  
4 **well, and so clearly that was her position and I think**  
5 **at that point he said, you know, I want to live in the**  
6 **dorm. I mean, he was very clear about that. So we**  
7 **made contact with a number of people who would provide**  
8 **us with information, this was a very new issue for us,**  
9 **to talk more about what options are available, what**  
10 **are Micah's rights, what should we know, what should**  
11 **we understand.**  
12 Q. Who did you talk to?  
13 **A. Richard Bernstein, a lawyer, who's known for his work**  
14 **with disability issues. We talked -- I talked with --**  
15 **at some point talked with Mark McWilliams from**  
16 **Michigan Protection & Advocacy; Elizabeth Bauer, who's**  
17 **on the State Board of Education, a member of the State**  
18 **Board of -- yeah, Michigan Education; Meg Grigal, who**  
19 **is one of the leading experts in the field of post**  
20 **secondary education is what it's called; probably Deb**  
21 **Hart, both of those two, as you know, coordinate the**  
22 **federally funded projects that are researching post**  
23 **secondary education. Those are the names that come**  
24 **to -- you know, immediately to my mind.**  
25 Q. When did you speak with -- well, who's Richard

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1 Bernstein?  
2 **A. He's a lawyer.**  
3 Q. How do you know him?  
4 **A. We've been -- had conversations, been at same**  
5 **gatherings around primarily disability issues. He's**  
6 **someone -- someone knew him when -- at -- knew Richard**  
7 **Bernstein when Micah was in high school, suggested**  
8 **that Micah meet Mr. Bernstein, to know another sort**  
9 **of -- you know, possibly be a mentor, you know -- you**  
10 **know, Micah who is living this inclusive life and sort**  
11 **of adhered to the principles that he understood**  
12 **Mr. Bernstein to have.**  
13 Q. Had Micah and Mr. Bernstein gotten together often?  
14 **A. Not often.**  
15 Q. All right. What did you talk to him about,  
16 Mr. Bernstein?  
17 **A. Well, I think Richie --**  
18 MR. DAVIS: Just caution.  
19 THE WITNESS: Oh.  
20 MR. DAVIS: Actually, you can answer that  
21 question.  
22 THE WITNESS: I -- yeah. I was not at that  
23 meeting, you know, conversation, so...  
24 BY MR. BOONIN:  
25 Q. What's your understanding as to what happened at that

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1 meeting?  
2 **A. Well, I think that's my understanding. I don't know.**  
3 **I don't know. Mr. Bernstein did attend the Board of**  
4 **Directors meeting and give -- what would be the word?**  
5 **Give a statement about why OU should open -- why Micah**  
6 **should be able to live in the dorm.**  
7 Q. You said that you -- was it you or your husband had a  
8 conversation with Mr. Bernstein?  
9 **A. Yes. I -- oh, Richie did.**  
10 Q. Okay. And what did your husband tell you about his  
11 conversation with Mr. Bernstein?  
12 **A. That he was willing to come and testify and support**  
13 **Micah's efforts to live in the dorm.**  
14 Q. To testify where?  
15 **A. Well, to testify -- I'm sorry if I'm using the wrong**  
16 **word -- to stand before the Board of Trustees and give**  
17 **a statement of support.**  
18 Q. University trustees?  
19 **A. Correct.**  
20 Q. Other than that, is there anything else that you were  
21 aware of that was discussed?  
22 **A. No. At that point, that was sort of what made sense**  
23 **to do. So that was the -- the next step.**  
24 Q. Have you had contact or your husband have contact with  
25 Mr. Bernstein since?