

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE LANCASTER DISTRICT  
3 OF PENNSYLVANIA

4 \* \* \* \* \*

5 STACY SNYDER, \*  
6 Plaintiff \* Case No.  
7 vs. \* 07-1660  
8 MILLERSVILLE \*  
9 UNIVERSITY; J. \*  
10 BARRY GIRVIN; DR. \*  
11 JANE BRAY; DR. \*  
12 VILAS A. PRABHU, \*  
13 Defendants \*

14 \* \* \* \* \*

15  
16 DEPOSITION OF  
17 JUDITH WEINRICH  
18 MARCH 7, 2008  
19  
20  
21  
22

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EXHIBIT  
"F"

1 answered. She considered all  
 2 these documents.  
 3 ATTORNEY VOIGT:  
 4 Okay. Well, I'm  
 5 wondering whether she  
 6 considered particular portions  
 7 of these documents.  
 8 BY ATTORNEY VOIGT:  
 9 Q. You considered that Ms. Snyder  
 10 did a good job with purpose; correct?  
 11 A. I read and considered all the  
 12 observations that were then provided  
 13 to me.  
 14 Q. Turn to the next page, it says  
 15 April 18th. You considered this  
 16 document; correct?  
 17 A. Yes.  
 18 Q. And in this document, Mr.  
 19 Girvin gives Ms. Snyder ten glowing  
 20 remarks; correct?  
 21 A. Yes.  
 22 Q. And you considered each one of  
 23 these; correct?  
 24 ATTORNEY KRAMER:  
 25 Objection, asked and

1 Q. Turn to Exhibit 77. This is  
 2 Stacy's PRAXIS tests updated from  
 3 March of 2006, it looks like. Do you  
 4 see that?  
 5 A. Yes.  
 6 Q. And it looks like Stacy passed  
 7 her English Language, Literature  
 8 Composition Content and Knowledge  
 9 test; is that right?  
 10 A. Yes.  
 11 Q. Are you familiar with that  
 12 test at all?  
 13 A. No.  
 14 Q. Well, you would agree with me  
 15 that passing the PRAXIS test is a  
 16 prerequisite to becoming a teacher;  
 17 right?  
 18 A. It's necessary in Pennsylvania  
 19 to be certified, yes.  
 20 Q. And you would agree that the  
 21 PRAXIS test is recognized as an  
 22 appropriate test of the preparedness  
 23 of future high school teachers?  
 24 A. No. I wouldn't agree  
 25 with ---.

1 answered.  
 2 ATTORNEY VOIGT:  
 3 I'll give you a  
 4 standing objection to the  
 5 asked and answered.  
 6 ATTORNEY KRAMER:  
 7 Right. But they're  
 8 repetitive questions that  
 9 aren't getting anywhere.  
 10 BY ATTORNEY VOIGT:  
 11 Q. So you considered that Ms.  
 12 Snyder had made great improvement and  
 13 content; correct?  
 14 A. Yes.  
 15 Q. And you considered that Ms.  
 16 Snyder had excellent CIRQL unit  
 17 planning; correct?  
 18 A. Yes.  
 19 Q. You considered that Mr. Girvin  
 20 complemented Ms. Snyder for getting  
 21 this class under control. Do you see  
 22 that? Number one.  
 23 A. Yes. I considered all of the  
 24 statements he wrote and all of his  
 25 observations.

1 Q. You don't agree with that?  
 2 A. I wouldn't agree that it's  
 3 sufficient. I would agree it's  
 4 considered ---.  
 5 Q. Okay. You wouldn't agree that  
 6 the PRAXIS test is an appropriate  
 7 test of the preparedness of future  
 8 high school teachers?  
 9 A. No. Not in and of itself, no.  
 10 Q. Do you know why the state  
 11 makes students take PRAXIS tests if  
 12 they're not appropriate ages ---?  
 13 ATTORNEY KRAMER:  
 14 Objection. That isn't  
 15 what she said.  
 16 BY ATTORNEY VOIGT:  
 17 Q. Well, you can answer.  
 18 A. It's one standardized measure.  
 19 Q. Turn to Exhibit 47, page five.  
 20 What's this document? Do you know  
 21 what this document is?  
 22 A. I believe it's the rubric for  
 23 the CIRQL project.  
 24 Q. Do you see the signature by  
 25 Mr. Girvin dated May 2 of 2006?

1 A. Uh-huh (yes).  
 2 Q. Is that a yes?  
 3 A. Yes.  
 4 Q. So this is the grading that  
 5 Mr. Girvin gave Ms. Snyder for her  
 6 CIRQL project; correct?  
 7 A. It's for a piece, so I'm not  
 8 sure.  
 9 Q. Did you consider the CIRQL  
 10 project grade that Ms. Snyder  
 11 received when you made your decisions  
 12 in May of 2006?  
 13 A. Yes.  
 14 Q. Turn to Exhibit 93. Do you  
 15 recognize this photo?  
 16 A. Yes.  
 17 Q. Did you see this photo in or  
 18 about May of 2006?  
 19 A. No.  
 20 Q. When did you first see it?  
 21 A. I don't recall.  
 22 Q. Turn to Exhibit 51. Have you  
 23 ever seen this photo and text before?  
 24 A. Yes.  
 25 Q. When did you first see it?

1 photo and text; correct?  
 2 A. Yes.  
 3 Q. And you are not aware of any  
 4 interference in student discipline at  
 5 Conestoga Valley due to this photo  
 6 and text; correct?  
 7 A. No.  
 8 Q. And you do not consider this  
 9 photo and text lewd or obscene, do  
 10 you?  
 11 A. No.  
 12 Q. And you reviewed also the text  
 13 accompanying the photograph; correct?  
 14 A. Yes.  
 15 Q. In the text, Ms. Snyder  
 16 discusses her decision not to apply  
 17 for a job at Conestoga Valley;  
 18 correct?  
 19 ATTORNEY KRAMER:  
 20 I'll object. It  
 21 doesn't refer to Conestoga  
 22 Valley.  
 23 ATTORNEY VOIGT:  
 24 All right.  
 25 BY ATTORNEY VOIGT:

1 A. May of 2006.  
 2 Q. And how did you come to  
 3 receive this photo and text?  
 4 A. It was one of the pieces of  
 5 material that Mr. Girvin brought to  
 6 my office.  
 7 Q. When was that?  
 8 A. May of 2006.  
 9 Q. All right. Now, as you sit  
 10 here today, you do not know of any  
 11 actual disruption of the learning  
 12 environment at Conestoga Valley due  
 13 to the photo and text; correct?  
 14 A. I didn't say that.  
 15 Q. I'm asking you that question.  
 16 A. I'm sorry. Can you repeat it?  
 17 Q. Okay. You do not know of any  
 18 actual disruption of the learning  
 19 environment at Conestoga Valley due  
 20 to the photo and text, Exhibit P-51;  
 21 correct?  
 22 A. I don't have any direct  
 23 knowledge, no.  
 24 Q. You would agree with me that  
 25 there's nothing threatening about

1 Q. It says, they keep asking me  
 2 why I won't apply there. Do you have  
 3 any idea what that means?  
 4 A. No.  
 5 Q. Now, Stacy was set to receive  
 6 her BSE Degree at graduation  
 7 ceremonies on May 13 of 2006. Is  
 8 that what your understanding was?  
 9 ATTORNEY KRAMER:  
 10 At what time? At what  
 11 point in time was she set to  
 12 receive it?  
 13 BY ATTORNEY VOIGT:  
 14 Q. Well, as of May 7th, 2006, Ms.  
 15 Snyder was scheduled to receive her  
 16 BSE Degree at graduation ceremonies  
 17 on May 13, 2006; correct?  
 18 A. Assuming completion of all  
 19 requirements, yes, that's my  
 20 understanding.  
 21 Q. It says assuming completion of  
 22 all requirements. Before seeing the  
 23 photo and text, you were not aware of  
 24 anybody that took any steps to deny  
 25 Ms. Snyder her BSE Degree; correct?

1 ATTORNEY KRAMER:  
 2 Objection as to the  
 3 characterization. You can try  
 4 to answer.  
 5 BY ATTORNEY VOIGT:  
 6 Q. Prior to May 8th of 2006, you  
 7 were not aware of anybody either at  
 8 Millersville or Conestoga Valley who  
 9 took any steps to deny Ms. Snyder her  
 10 BSE Degree; correct?  
 11 A. Yes.  
 12 Q. Is that ---?  
 13 A. Yes, that's correct.  
 14 Q. Okay. Prior to the incident  
 15 which came to light on May 8th of  
 16 2006, you personally had not taken  
 17 any steps to deny Ms. Snyder her BSE  
 18 Degree and teaching certificate;  
 19 correct?  
 20 ATTORNEY KRAMER:  
 21 Objection. She doesn't  
 22 have a right to Ms. Snyder's  
 23 teaching certificate.  
 24 ATTORNEY VOIGT:  
 25 All right.

1 text here --- well, strike that.  
 2 Describe for me how you  
 3 received this photo and text. What  
 4 time of day was it?  
 5 A. I don't recall what time of  
 6 day it was.  
 7 Q. All right. You said that Mr.  
 8 Girvin gave this photo and text to  
 9 you; is that correct?  
 10 A. Mr. Girvin brought a lot of  
 11 materials relating to her  
 12 performance. This was one document  
 13 in the materials that he had brought  
 14 to me.  
 15 Q. When was that?  
 16 A. I believe it was on a  
 17 Thursday.  
 18 Q. Thursday. Would that be May  
 19 8th?  
 20 A. I think so. The Thursday of  
 21 that week, I believe.  
 22 ATTORNEY KRAMER:  
 23 On here it says  
 24 Thursday, May 4th.  
 25 ATTORNEY VOIGT:

1 BY ATTORNEY VOIGT:  
 2 Q. You can answer.  
 3 A. Can you repeat the question?  
 4 Q. Sure. Prior to May 8th of  
 5 2006, you did not take any steps to  
 6 deny Ms. Snyder her teaching  
 7 certificate; correct?  
 8 ATTORNEY KRAMER:  
 9 Objection as to the  
 10 form.  
 11 BY ATTORNEY VOIGT:  
 12 Q. You can answer.  
 13 ATTORNEY KRAMER:  
 14 And it assumes facts  
 15 not in evidence, arbitrary to  
 16 the record.  
 17 ATTORNEY VOIGT:  
 18 I'll rephrase.  
 19 BY ATTORNEY VOIGT:  
 20 Q. Prior to May 8th of 2006, you  
 21 did not take any steps to deny Ms.  
 22 Snyder her BSE Degree; correct?  
 23 A. Yes. I hadn't had any  
 24 involvement with Ms. Snyder.  
 25 Q. After receiving the photo and

1 I'll pull out my  
 2 calendar.  
 3 BY ATTORNEY VOIGT:  
 4 Q. All right. May 10th, 2006 was  
 5 a Thursday. Is that when you first  
 6 saw this photo and text?  
 7 A. I believe so.  
 8 Q. No, strike that. I didn't go  
 9 back far enough.  
 10 ATTORNEY KRAMER:  
 11 Off the record.  
 12 OFF RECORD DISCUSSION  
 13 BY ATTORNEY VOIGT:  
 14 Q. So the first time you saw this  
 15 was Thursday, May 11th of 2006?  
 16 A. Yes.  
 17 Q. How did it come to your  
 18 attention?  
 19 ATTORNEY KRAMER:  
 20 Objection, asked and  
 21 answered ---.  
 22 BY ATTORNEY VOIGT:  
 23 Q. Did you and Girvin have a  
 24 conversation about this?  
 25 A. We had a conversation about

1 the materials.  
 2 Q. Well, what was your reaction  
 3 when you saw this document?  
 4 ATTORNEY KRAMER:  
 5 Which document? This  
 6 one specific ---  
 7 ATTORNEY VOIGT:  
 8 P-51.  
 9 ATTORNEY KRAMER:  
 10 --- P-51?  
 11 ATTORNEY VOIGT:  
 12 Yes.  
 13 A. I don't recall.  
 14 BY ATTORNEY VOIGT:  
 15 Q. Did you take any action after  
 16 you saw the document, Exhibit P-51?  
 17 ATTORNEY KRAMER:  
 18 Objection. She didn't  
 19 see any of this document,  
 20 P-51. She said repeatedly  
 21 that she saw many materials.  
 22 ATTORNEY VOIGT:  
 23 Okay.  
 24 BY ATTORNEY VOIGT:  
 25 Q. After seeing P-51, did you

1 the first time I have seen it.  
 2 It is not part of the official  
 3 record and has not yet been  
 4 accepted by the Court.  
 5 Nonetheless, you may choose  
 6 the aspect of the stipulated  
 7 facts of the alleged  
 8 allegations.  
 9 ATTORNEY VOIGT:  
 10 Well, just to respond  
 11 briefly, you were provided a  
 12 copy of it through the court's  
 13 electronic filing system at  
 14 about one o'clock last night.  
 15 And by agreement between you  
 16 and the Court and me and the  
 17 Court, the electronic filing  
 18 system is the official service  
 19 of process.  
 20 ATTORNEY KRAMER:  
 21 Yes. I simply said I  
 22 haven't seen it yet.  
 23 ATTORNEY VOIGT:  
 24 All right.  
 25 BY ATTORNEY VOIGT:

1 take any action?  
 2 ATTORNEY KRAMER:  
 3 Same objection. You  
 4 can try to answer.  
 5 A. Not specifically to this.  
 6 BY ATTORNEY VOIGT:  
 7 Q. Okay. Did you take any action  
 8 in general with regard to Stacy's  
 9 future and her upcoming graduation?  
 10 A. I scheduled a conference with  
 11 Stacy.  
 12 Q. Why did you do that?  
 13 A. To talk with her.  
 14 Q. All right. Turn to P-100.  
 15 OFF RECORD DISCUSSION  
 16 BY ATTORNEY VOIGT:  
 17 Q. Page six, paragraph 28.  
 18 ATTORNEY KRAMER:  
 19 Off the record.  
 20 OFF RECORD DISCUSSION  
 21 ATTORNEY KRAMER:  
 22 Just for the record,  
 23 I'm going to object to any  
 24 reference to the document  
 25 under the complaint. This is

1 Q. Page six, paragraph 28. On or  
 2 about May 4, 2006, a CV  
 3 representative downloaded a  
 4 photograph and text. Do you know who  
 5 that representative was?  
 6 A. No.  
 7 Q. Did you speak with Ms.  
 8 Buffington about Ms. Snyder's  
 9 situation on or about May 8th, 2006?  
 10 A. No.  
 11 Q. Okay. Turn to paragraph  
 12 30 --- strike that.  
 13 Turn to Plaintiff's Exhibit  
 14 48. This is an e-mail from Anne  
 15 Buffington to Nicole Reinking, et  
 16 cetera. Did you receive this  
 17 document?  
 18 A. Not the first page, the  
 19 second.  
 20 Q. When did you receive the  
 21 second page?  
 22 A. It was one of the pieces of  
 23 information that Mr. Girvin provided  
 24 me with.  
 25 Q. Did you speak directly with

1 degree; is she mistaken?  
 2 ATTORNEY KRAMER:  
 3 Objection. That's not  
 4 what Doctor Bray said.  
 5 BY ATTORNEY VOIGT:  
 6 Q. So you're saying that you do  
 7 not award BSE degrees; correct?  
 8 ATTORNEY KRAMER:  
 9 Objection, ---  
 10 BY ATTORNEY VOIGT:  
 11 Q. Personally?  
 12 ATTORNEY KRAMER:  
 13 --- asked and answered.  
 14 Let's move on, Mark. You're  
 15 not getting anywhere on this  
 16 line.  
 17 BY ATTORNEY VOIGT:  
 18 Q. Ms. Snyder recalls ---. Did  
 19 you discuss Ms. Reinking's list at  
 20 the meeting on April --- on May 15th?  
 21 A. Can you show me what the list  
 22 was?  
 23 Q. Exhibit 48. Do you recall  
 24 discussing that list?  
 25 A. No.

1 Q. Do you recall Doctor Bray  
 2 saying during the meeting on May 15th  
 3 that the picture and caption promoted  
 4 underage drinking?  
 5 ATTORNEY KRAMER:  
 6 Object as to form.  
 7 Compound question.  
 8 BY ATTORNEY VOIGT:  
 9 Q. Do you recall Doctor Bray  
 10 saying during the meeting that the  
 11 picture promotes underage drinking?  
 12 ATTORNEY KRAMER:  
 13 Object as to form.  
 14 ATTORNEY VOIGT:  
 15 You can answer.  
 16 ATTORNEY KRAMER:  
 17 You can try to answer.  
 18 BY ATTORNEY VOIGT:  
 19 Q. Do you recall Doctor ---  
 20 A. No.  
 21 Q. --- Bray saying during the  
 22 meeting that the picture, Exhibit 51,  
 23 promotes underage drinking?  
 24 A. No, I do not.  
 25 Q. Do you recall Doctor Bray

1 telling Ms. Snyder that she should  
 2 feel flattered because she had made  
 3 it the closest to graduation before  
 4 losing her BSE degree?  
 5 ATTORNEY KRAMER:  
 6 Object as to form. You  
 7 can try to answer ---.  
 8 BY ATTORNEY VOIGT:  
 9 Q. Do you remember ---?  
 10 A. She didn't say that.  
 11 Q. Did you say that?  
 12 A. No. No one said that.  
 13 Q. Do you remember Ms. Snyder's  
 14 mother being present during that  
 15 meeting?  
 16 ATTORNEY KRAMER:  
 17 Object as to form. She  
 18 said she did, so I object.  
 19 Asked and answered.  
 20 BY ATTORNEY VOIGT:  
 21 Q. Do you remember Ms. Snyder's  
 22 mother saying anything during the  
 23 meeting?  
 24 A. No.  
 25 Q. No? Do you remember Doctor

1 Bray telling Ms. Snyder's mother that  
 2 she was the most calm parent that had  
 3 ever set foot into an appeal hearing?  
 4 ATTORNEY KRAMER:  
 5 Object as to form. You  
 6 can answer.  
 7 A. No, I don't remember.  
 8 BY ATTORNEY VOIGT:  
 9 Q. Turn to Exhibit 83. Did you  
 10 ever see this document before?  
 11 A. No.  
 12 Q. Let me represent to you that  
 13 these are signatures and comments by  
 14 Ms. Snyder's students. Would this  
 15 document have been significant to you  
 16 in making your decisions?  
 17 A. No.  
 18 ATTORNEY VOIGT:  
 19 Let's take a break.  
 20 SHORT BREAK TAKEN  
 21 BY ATTORNEY VOIGT:  
 22 Q. During this process, did you  
 23 ever consider allowing Ms. Snyder to  
 24 just repeat her student teaching  
 25 practical in another school?

1 A. She could always have done  
2 that.  
3 Q. How would she have done that  
4 through Millersville?  
5 A. That's not what you asked me.  
6 Q. Okay. At any time during the  
7 events that transpired in May of  
8 2006, did you consider allowing Ms.  
9 Snyder, while still a student at  
10 Millersville University, to repeat  
11 her student teaching practical at  
12 another school?  
13 ATTORNEY KRAMER:  
14 Object to form.  
15 BY ATTORNEY VOIGT:  
16 Q. At another public school?  
17 ATTORNEY KRAMER:  
18 Same objection. You  
19 can answer.  
20 A. That would --- Stacy could  
21 have pursued that.  
22 BY ATTORNEY VOIGT:  
23 Q. How would have Stacy have  
24 pursued that?  
25 A. She could have applied to

1 teaching assignment?  
2 A. No.  
3 Q. Why not?  
4 A. It was my professional opinion  
5 that there were difficulties with  
6 both her knowledge of content, or her  
7 lack thereof, and the types of  
8 judgment and her inability as  
9 documented by the evidence that was  
10 in front of me, to successfully  
11 implement the suggestions of a  
12 cooperating teacher and her  
13 supervisor.  
14 Q. You mentioned content. Stacy  
15 had been a student at Millersville  
16 for almost four years; right?  
17 A. I don't recall.  
18 Q. All right. Would it not have  
19 been possible for Millersville to  
20 allow Stacy to take some remedial  
21 content courses while still a student  
22 at Millersville University and then  
23 resume her student teaching practical  
24 at another school?  
25 A. I suppose it was possible.

1 another institution.  
2 Q. What other institution? Are  
3 you talking about a college?  
4 A. I thought that's what you were  
5 talking about.  
6 Q. No. At any time, did you  
7 consider allowing Stacy to remain  
8 enrolled at Millersville University,  
9 take another semester and repeat her  
10 student teaching assignment at  
11 another high school?  
12 A. Yes.  
13 Q. Why did you not offer that to  
14 Ms. Snyder?  
15 A. I hadn't made any decision  
16 before Stacy came and spoke with me.  
17 And she participated in, you know,  
18 offering me information.  
19 Q. That wasn't responsive to my  
20 question. Did you ever offer Ms.  
21 Snyder the opportunity, while still a  
22 student at Millersville University,  
23 to come back for an additional  
24 semester, go to another public high  
25 school and repeat her student

1 Q. But you rejected that?  
2 ATTORNEY KRAMER:  
3 No, that's not what she  
4 said. If you know, Doctor  
5 Weinrich, answer yes. If you  
6 don't know, don't speculate.  
7 A. Can you repeat the question?  
8 BY ATTORNEY VOIGT:  
9 Q. If Stacy was weak on content,  
10 why didn't Millersville try to help  
11 her and allow her to remain a  
12 student, take some more remedial  
13 content courses and then go back and  
14 try her student teaching again?  
15 A. It wasn't just the content.  
16 Q. It was the professionalism;  
17 right?  
18 ATTORNEY KRAMER:  
19 Objection. That's not  
20 what she's saying.  
21 BY ATTORNEY VOIGT:  
22 Q. Well, if it wasn't just the  
23 content, then what else was it?  
24 ATTORNEY KRAMER:  
25 She answered that.

1 That's in all the evidence,  
 2 all that ---.  
 3 ATTORNEY VOIGT:  
 4 Okay. Well, if you  
 5 don't mind, Barry, I'll let  
 6 the witness answer ---.  
 7 ATTORNEY KRAMER:  
 8 I know. She already  
 9 asked --- she already answered  
 10 the question.  
 11 ATTORNEY VOIGT:  
 12 No, she didn't. She's  
 13 been beating around the bush  
 14 all afternoon.  
 15 ATTORNEY KRAMER:  
 16 She answered your  
 17 question. Try to answer it  
 18 again.  
 19 A. She had --- it was clear to me  
 20 that Stacy had not only received the  
 21 feedback from her supervisors and  
 22 cooperating teachers, she had  
 23 received it in writing. She had  
 24 received it throughout the placement,  
 25 early in the placement. At mid-

1 ATTORNEY KRAMER:  
 2 If that's what the  
 3 document says.  
 4 BY ATTORNEY VOIGT:  
 5 Q. So content knowledge and  
 6 preparation was not a weakness?  
 7 A. That's not true.  
 8 ATTORNEY KRAMER:  
 9 Object.  
 10 BY ATTORNEY VOIGT:  
 11 Q. What part of this document do  
 12 you see as showing a weakness in  
 13 content knowledge, as per Exhibit 58?  
 14 A. I wasn't talking --- I wasn't  
 15 referring solely to this  
 16 document ---.  
 17 Q. Wasn't this the final  
 18 evaluation?  
 19 ATTORNEY KRAMER:  
 20 Object. You're getting  
 21 argumentative. Ask open-ended  
 22 questions. She'll give you an  
 23 answer.  
 24 BY ATTORNEY VOIGT:  
 25 Q. All right. What happened ---

1 point, her performance was failing.  
 2 She was not able, or at least did not  
 3 demonstrate that she could implement  
 4 the suggestions that they were making  
 5 to her in a variety of areas.  
 6 BY ATTORNEY VOIGT:  
 7 Q. And by the variety of areas,  
 8 you're talking about the list of  
 9 unprofessional behavior in the  
 10 classroom at P-48, page two?  
 11 ATTORNEY KRAMER:  
 12 Objection. That's not  
 13 what she said.  
 14 BY ATTORNEY VOIGT:  
 15 Q. Well, what variety of areas  
 16 are you talking about?  
 17 A. Many of the areas where she  
 18 was rated unsatisfactory on all of  
 19 those evaluations forms. Classroom  
 20 management was one area.  
 21 Preparation, content knowledge.  
 22 Q. Were you aware that Mr.  
 23 Girvin --- turn to Exhibit 58. Mr.  
 24 Girvin rated Ms. Snyder satisfactory  
 25 or competent in preparation; correct?

1 let's move on. There eventually was  
 2 an appeal in or about February of  
 3 2007; right?  
 4 A. Uh-huh (yes).  
 5 ATTORNEY KRAMER:  
 6 I'll object. Same  
 7 objection to all these  
 8 questions about the appeal.  
 9 They're not at all relevant in  
 10 this case.  
 11 BY ATTORNEY VOIGT:  
 12 Q. Did you have any conversations  
 13 with Doctor Prabhu prior to the  
 14 appeal?  
 15 A. No.  
 16 Q. Did you have any conversations  
 17 with Doctor Bray about Ms. Snyder  
 18 prior to the appeal?  
 19 A. No. I mean, not --- you know,  
 20 we had talked, of course, before the  
 21 appeal had been made to Doctor Bray,  
 22 but not prior to the other appeal.  
 23 Q. Did you have any input into  
 24 Doctor Prabhu's decision on the  
 25 appeals, Exhibit 63?