

<p style="text-align: right;">Page 13</p> <p>1 A. Yes.</p> <p>2 Q. How many children do you have?</p> <p>3 A. Two.</p> <p>4 Q. And their names?</p> <p>5 A. Shanna Ray, Lisa Eileen.</p> <p>6 Q. How old is Shanna Ray?</p> <p>7 A. Shanna is 30.</p> <p>8 Q. Where is she located at?</p> <p>9 A. She's home.</p> <p>10 Q. She's the one home with the two grandchildren?</p> <p>11 A. Mm-hmm.</p> <p>12 Q. And Lisa Eileen?</p> <p>13 A. She's also here, she has her own apartment.</p> <p>14 Q. How old is she?</p> <p>15 A. Thirty-seven.</p> <p>16 Q. And when you say that Shanna Lee is here temporarily,</p> <p>17 where does she --</p> <p>18 A. Shanna Ray.</p> <p>19 Q. Shanna Ray, where did she come from?</p> <p>20 A. She comes from Wetumpka (ph), Alabama, she has a home</p> <p>21 there. They are more or less separated right now.</p> <p>22 Q. How long has she been in Michigan?</p> <p>23 A. She just returned. She's been visiting now for about</p> <p>24 a month.</p> <p>25 Q. Have you made any tape recordings of any meetings or</p>	<p style="text-align: right;">Page 15</p> <p>1 A. No, we haven't made any.</p> <p>2 Q. Okay. Correct. So there would have been none made</p> <p>3 and you have not, therefore, retained any, correct?</p> <p>4 A. Correct.</p> <p>5 Q. What's your date of birth?</p> <p>6 A. August 4th, '43.</p> <p>7 Q. And your Social Security Number?</p> <p>8 A. 363-44-9332.</p> <p>9 MR. MARZANO: Sorry, could you say the last</p> <p>10 four digits? I couldn't hear it.</p> <p>11 A. 9332.</p> <p>12 MS. HUSBAND: Could we have the whole thing</p> <p>13 again? It was too fast.</p> <p>14 MS. LLOYD: I can do it, 363-44-9332, now</p> <p>15 that I'm talking in my new loud voice.</p> <p>16 BY MS. LLOYD:</p> <p>17 Q. And it's fair to say that, other than this Workers'</p> <p>18 Compensation case that you've told me about, you've</p> <p>19 been involved in no other lawsuits, correct?</p> <p>20 A. No.</p> <p>21 Q. And you've never been sued for anything, correct?</p> <p>22 A. No.</p> <p>23 Q. One of the claims --</p> <p>24 A. No. No. I was sued once.</p> <p>25 Q. What was that?</p>
<p style="text-align: right;">Page 14</p> <p>1 conversations that you have had with any of the</p> <p>2 defendants in this case?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And have you provided copies of all those tapes</p> <p>5 to the defendants?</p> <p>6 A. No. At this point in time, no. But we can. That is</p> <p>7 not a problem.</p> <p>8 Q. Well, let's go over as far as Glacier Hills is</p> <p>9 concerned, all right?</p> <p>10 A. Okay.</p> <p>11 Q. What tape recordings have you made, if any, with</p> <p>12 anyone from Glacier Hills?</p> <p>13 A. Glacier Hills, I don't believe there are any. When I</p> <p>14 say "tape recording," this is mostly over the appeals</p> <p>15 system, the college appeals procedure involving seven</p> <p>16 steps.</p> <p>17 Q. So is it fair to say that you don't have any tape</p> <p>18 recordings regarding any conversations with anyone</p> <p>19 from Glacier?</p> <p>20 A. That's correct.</p> <p>21 Q. And is it also fair to say that you never made any</p> <p>22 tape recordings of conversations with anyone from</p> <p>23 Glacier?</p> <p>24 A. No.</p> <p>25 Q. That's not fair to say?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. Involving my daughter's apartment. She could not make</p> <p>2 the payments, and so I was left with a bill.</p> <p>3 Q. Mm-hmm. When was that?</p> <p>4 A. The date, I don't have offhand.</p> <p>5 Q. Okay. How about the year?</p> <p>6 A. That would be around three years ago.</p> <p>7 Q. So approximately 2000?</p> <p>8 A. Mm-hmm.</p> <p>9 Q. And what, what entity sued you?</p> <p>10 A. What/what?</p> <p>11 Q. Did the apartment complex sue you?</p> <p>12 A. Yes.</p> <p>13 Q. What was the name of the complex?</p> <p>14 A. Lakes Apartments. It was settled, it was settled and</p> <p>15 the amount was given. Actually, I was making</p> <p>16 payments, and I, they wanted more and we went to court</p> <p>17 over it to settle the matter.</p> <p>18 Q. All right. Where was it that you went to court over</p> <p>19 it?</p> <p>20 A. This would be the Southfield, in the 46th District</p> <p>21 Court.</p> <p>22 Q. Did that case go to trial?</p> <p>23 A. Oh, no.</p> <p>24 Q. Other than that case, about three years ago, have you</p> <p>25 been involved in any other lawsuits, either suing</p>

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- 1 A. Yes.
- 2 Q. How many children do you have?
- 3 A. Two.
- 4 Q. And their names?
- 5 A. Shanna Ray, Lisa Eileen.
- 6 Q. How old is Shanna Ray?
- 7 A. Shanna is 30.
- 8 Q. Where is she located at?
- 9 A. She's home.
- 10 Q. She's the one home with the two grandchildren?
- 11 A. Mm-hmm.
- 12 Q. And Lisa Eileen?
- 13 A. She's also here, she has her own apartment.
- 14 Q. How old is she?
- 15 A. Thirty-seven.
- 16 Q. And when you say that Shanna Lee is here temporarily,
- 17 where does she --
- 18 A. Shanna Ray.
- 19 Q. Shanna Ray, where did she come from?
- 20 A. She comes from Wotompka (ph), Alabama, she has a home
- 21 there. They are more or less separated right now.
- 22 Q. How long has she been in Michigan?
- 23 A. She just returned. She's been visiting now for about
- 24 a month.
- 25 Q. Have you made any tape recordings of any meetings or

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- 1 conversations that you have had with any of the
- 2 defendants in this case?
- 3 A. Yes.
- 4 Q. Okay. And have you provided copies of all those tapes
- 5 to the defendants?
- 6 A. No. At this point in time, no. But we can. That is
- 7 not a problem.
- 8 Q. Well, let's go over as far as Glacier Hills is
- 9 concerned, all right?
- 10 A. Okay.
- 11 Q. What tape recordings have you made, if any, with
- 12 anyone from Glacier Hills?
- 13 A. Glacier Hills, I don't believe there are any. When I
- 14 say "tape recording," this is mostly over the appeals
- 15 system, the college appeals procedure involving seven
- 16 steps.
- 17 Q. So is it fair to say that you don't have any tape
- 18 recordings regarding any conversations with anyone
- 19 from Glacier?
- 20 A. That's correct.
- 21 Q. And is it also fair to say that you never made any
- 22 tape recordings of conversations with anyone from
- 23 Glacier?
- 24 A. No.
- 25 Q. That's not fair to say?

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- 1 A. No, we haven't made any.
- 2 Q. Okay. Correct. So there would have been none made
- 3 and you have not, therefore, retained any, correct?
- 4 A. Correct.
- 5 Q. What's your date of birth?
- 6 A. August 4th, '43.
- 7 Q. And your Social Security Number?
- 8 A. 363-44-9332.
- 9 MR. MARZANO: Sorry, could you say the last
- 10 four digits? I couldn't hear it.
- 11 A. 9332.
- 12 MS. HUSBAND: Could we have the whole thing
- 13 again? It was too fast.
- 14 MS. LLOYD: I can do it, 363-44-9332, now
- 15 that I'm talking in my new loud voice.
- 16 BY MS. LLOYD:
- 17 Q. And it's fair to say that, other than this Workers'
- 18 Compensation case that you've told me about, you've
- 19 been involved in no other lawsuits, correct?
- 20 A. No.
- 21 Q. And you've never been sued for anything, correct?
- 22 A. No.
- 23 Q. One of the claims --
- 24 A. No. No. I was sued once.
- 25 Q. What was that?

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- 1 A. Involving my daughter's apartment. She could not make
- 2 the payments, and so I was left with a bill.
- 3 Q. Mm-hmm. When was that?
- 4 A. The date, I don't have offhand.
- 5 Q. Okay. How about the year?
- 6 A. That would be around three years ago.
- 7 Q. So approximately 2000?
- 8 A. Mm-hmm.
- 9 Q. And what, what entity sued you?
- 10 A. What/what?
- 11 Q. Did the apartment complex sue you?
- 12 A. Yes.
- 13 Q. What was the name of the complex?
- 14 A. Lakes Apartments. It was settled, it was settled and
- 15 the amount was given. Actually, I was making
- 16 payments, and I, they wanted more and we went to court
- 17 over it to settle the matter.
- 18 Q. All right. Where was it that you went to court over
- 19 it?
- 20 A. This would be the Southfield, in the 46th District
- 21 Court.
- 22 Q. Did that case go to trial?
- 23 A. Oh, no.
- 24 Q. Other than that case, about three years ago, have you
- 25 been involved in any other lawsuits, either suing

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1 before I make a statement on the record, it's your
 2 testimony that you believe you didn't receive due
 3 process because you believe that there were problems
 4 with the hearings and that they were not fair and
 5 impartial, is that correct?
 6 A. There was no thorough investigation.
 7 Q. Okay. So it is your belief that you didn't receive
 8 due process because the hearings were not fair and
 9 impartial and that you believe there was not
 10 appropriate investigation, is that correct?
 11 A. That's true, yes.
 12 Q. Any other reason you believe you did not receive due
 13 process?
 14 A. Are you talking about now from Glacier Hills as well?
 15 Q. From anyone. Why do you believe you did not receive
 16 due process?
 17 A. Well, due process from Glacier Hills was not fulfilled
 18 in the fact that evidence pertaining to a Glacier
 19 Hills letter destroyed any advantage that I had of
 20 being reinstated. It was the instrument they used to
 21 remove me. It was this letter that influenced the
 22 defendants at the fourth appeal hearing as well as the
 23 nine-member panel.
 24 Q. Okay. So is it fair to say that, as far as Glacier
 25 Hills is concerned, you believe that the letter that

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1 this count as well, that by writing the letter, the
 2 Glacier Hills 1996 letter, that you believe Glacier
 3 Hills and Linnea Atkins conspired to violate your
 4 civil rights?
 5 A. I definitely do, yes.
 6 Q. Is there any other reason why you believe that Glacier
 7 Hills or Linnea Atkins violated your civil rights or
 8 conspired to violate your civil rights?
 9 A. In 1999, we asked, through the Freedom of Information
 10 Act, for all documentation pertaining to me, my
 11 internship at that time. They replied back that there
 12 was nothing in my file much less a file at all. There
 13 was no record of this letter as ever being existent.
 14 So it shows conspiracy. Not only that, the Glacier
 15 Hills letter was issued after I had withdrawn from
 16 Glacier Hills. If this letter was that important,
 17 then why wasn't it issued well before this time?
 18 Q. Okay. And I'll go into more questions regarding
 19 that --
 20 A. Okay.
 21 Q. -- as we go further. I just want to make sure, then,
 22 as far as the conspiracy to violate civil rights, you
 23 believe that the actions of Glacier Hills, as far as
 24 writing the letter in the first instance --
 25 A. Mm-hmm.

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1 was written on November 1st, 1996 --
 2 A. Correct.
 3 Q. -- was an inappropriate one, and therefore, by
 4 drafting that letter, you were denied due process?
 5 A. Yes, I do.
 6 Q. Okay. And that's your claim essentially against
 7 Glacier Hills?
 8 A. Yes, it is, exactly.
 9 MR. BANKS: May I confer with my client for
 10 a moment?
 11 MS. LLOYD: You know, you may not. And you
 12 know, especially in Federal Court, even outside of the
 13 room, at any point in time after it starts, you cannot
 14 discuss or have any contact with your client.
 15 MR. BANKS: Fair enough.
 16 BY MS. LLOYD:
 17 Q. I want to focus in -- I'd like to focus in then on
 18 your claims, because as you know, this is a
 19 multi-count complaint --
 20 A. Yes, it is.
 21 Q. You not only have a due process claim, you have some
 22 other claims. All right. You also have a count, it's
 23 count 2 in Your Complaint, it's called Violation of
 24 the Ku Klux Klan Act, conspiracy to violate civil
 25 rights. And it's my understanding that your claim in

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1 Q. -- the fact that they indicated that they did not have
 2 the letter when you made this Freedom of Information
 3 Act request in 1999, and the fact that the letter was
 4 dated after you had allegedly withdrawn from Glacier
 5 Hills supports your conspiracy claim?
 6 A. Yes.
 7 Q. Are there any other facts, as far as Glacier Hills or
 8 Linnea Atkins is concerned, that you believe they did
 9 that somehow constitutes conspiracy or a violation of
 10 your civil rights?
 11 A. There was nothing really outside of this letter. This
 12 was the instrument, as I mentioned before, that was
 13 used.
 14 Q. Would it be fair to say that, as far as Glacier Hills
 15 is concerned and Linnea Atkins, the other claims you
 16 have in this case as far as misrepresentation and
 17 defamation, that they all essentially come from the
 18 writing of this letter --
 19 A. Yes.
 20 Q. -- is that correct? So your real problem, as far as
 21 or your claim against Glacier Hills, is centered
 22 around the November 1st, 1996 letter?
 23 A. That is correct.
 24 Q. And so that would go to each and every count of your
 25 Complaint, is that fair to say?

<p style="text-align: right;">Page 37</p> <p>1 A. Yes.</p> <p>2 Q. Now, as I understand it, when you went through the</p> <p>3 appeal process with Schoolcraft, you had a number of</p> <p>4 hearings, is that right?</p> <p>5 A. Yes. Mm-hmm.</p> <p>6 Q. And you attended each of those hearings?</p> <p>7 A. Oh, yes.</p> <p>8 Q. Is it fair to say that there was no one from Glacier</p> <p>9 Hills that appeared or testified at those hearings?</p> <p>10 A. No.</p> <p>11 Q. That no one --</p> <p>12 A. No.</p> <p>13 Q. -- appeared or testified, correct?</p> <p>14 A. No, that's correct.</p> <p>15 Q. I also understand that one of your concerns was that,</p> <p>16 at some of the hearings that you had had at</p> <p>17 Schoolcraft, you, at the time of those hearings, you</p> <p>18 did not have the Glacier letter that we referred to</p> <p>19 as --</p> <p>20 A. That is correct, it -- yes.</p> <p>21 MS. LLOYD: James, can I see those? Where</p> <p>22 is the exhibit pile?</p> <p>23 MR. BANKS: Which exhibits? The Complaint?</p> <p>24 MS. LLOYD: The exhibit pile, the ones she</p> <p>25 had in front of her.</p>	<p style="text-align: right;">Page 39</p> <p>1 this letter and looking over its contents, we, my</p> <p>2 husband and I, went to see Linda Novack. At this</p> <p>3 time, we presented the letter to her and she stated</p> <p>4 that she had -- was not even aware of the contents to</p> <p>5 not agree with it, nor does she remember signing the</p> <p>6 letter or seeing it. My husband was a witness to this</p> <p>7 fact. The only comment that she would make, and I'll</p> <p>8 make it brief, she stated that my signature is there,</p> <p>9 I must have done so. But she did not remember doing</p> <p>10 it. She went over the contents of the letter and she</p> <p>11 did not agree with its contents. It is hard for me to</p> <p>12 believe that she would have signed a letter when she</p> <p>13 did not agree to its composition.</p> <p>14 MS. HUSBAND: Can we get a date or a time?</p> <p>15 MS. LLOYD: We're going to go to that in a</p> <p>16 second.</p> <p>17 MR. BANKS: May I have those back?</p> <p>18 MS. LLOYD: Sure. Before I get them all</p> <p>19 confused?</p> <p>20 MR. BANKS: Yes.</p> <p>21 MS. LLOYD: Yes. Let me make sure I've got</p> <p>22 mine in here.</p> <p>23 MR. BANKS: I've got 1.</p> <p>24 MS. LLOYD: Do you have 9 in front of you?</p> <p>25 MR. BANKS: Yes. Thank you.</p>
<p style="text-align: right;">Page 38</p> <p>1 BY MS. LLOYD:</p> <p>2 Q. And as a matter of fact in reading the transcript,</p> <p>3 that was one of the concerns that you voiced, was that</p> <p>4 at some of those hearings, individuals were talking</p> <p>5 about a Glacier letter, but you had not received it,</p> <p>6 is that correct?</p> <p>7 A. This letter did not reveal itself until the fifth</p> <p>8 appeal on demand.</p> <p>9 Q. As a matter of fact, you didn't receive that letter</p> <p>10 until April 22nd, 1998 --</p> <p>11 A. That is correct.</p> <p>12 Q. -- when you received it from --</p> <p>13 A. Conway Jeffress.</p> <p>14 Q. -- Conway Jeffress, as indicated in Exhibit Number 9,</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. Is it fair to say that when you were attending those</p> <p>18 hearings before you received the Glacier Hills letter</p> <p>19 in April of 1999, and you were hearing things about</p> <p>20 this Glacier Hills letter, that you were concerned</p> <p>21 that you had never seen it?</p> <p>22 A. Definitely.</p> <p>23 Q. Did you start to think at that point that there was</p> <p>24 some kind of conspiracy?</p> <p>25 A. I knew. I knew there was. If you, upon receiving</p>	<p style="text-align: right;">Page 40</p> <p>1 BY MS. LLOYD:</p> <p>2 Q. So, is it fair to say that once you actually received</p> <p>3 Exhibit 9 and had the Glacier letter in front of you,</p> <p>4 that you were even more sure of the fact that there</p> <p>5 was a conspiracy?</p> <p>6 A. Yes.</p> <p>7 Q. The conversation that you had with Linda Novack, when</p> <p>8 was that?</p> <p>9 A. That was after the appeals. It's when we actually</p> <p>10 received the letter. So it was sometime in '98.</p> <p>11 Q. Sometime in --</p> <p>12 A. No, not '98. It was fairly recent. I don't have the</p> <p>13 actual date, I'm sorry, I really -- I should refrain</p> <p>14 from giving you a time period. It was not that long</p> <p>15 ago.</p> <p>16 Q. It's fair to say you don't recall the date, correct?</p> <p>17 A. Mm-hmm.</p> <p>18 Q. But that would have been the time that you showed up</p> <p>19 at Linda Novack's home, correct?</p> <p>20 A. Mm-hmm.</p> <p>21 Q. And you showed up at Linda Novack's home with your</p> <p>22 husband, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And as I understand it, she was coming back from</p> <p>25 jogging or doing some type of outside activity, is</p>