		1
1	IN THE SUPERIOR COURT OF WASHINGTON	
2	IN AND FOR PIERCE COUNTY	
3		
4		
5	GILLIAN MARSHALL,)	
6	Plaintiff,)	
7	vs) No. 19-2-11120-3)	
8	THE STATE OF WASHINGTON,) UNIVERSITY OF WASHINGTON, a)	
9	State Agency, DIANE YOUNG,) individually, and TOM DIEHM,)	
10	individually, Defendants.	
11 12 13 14	VIDEOTAPED REMOTE DEPOSITION OF RICHARD FURMAN, Ph.D Taken at the instance of the Plaintiff	
15 16 17 18 19	Tuesday, November 17, 2020 11:30 a.m. to 11:41 a.m. Virtual Videotaped Zoom Deposition Washington	
20	Anita Mitchell, Court Reporter	
21		
22	BRIDGES REPORTING & LEGAL VIDEO	
23	Certified Shorthand Reporters 1312 N. Monroe Street	
24	Spokane, Washington 99201 (509) 456-0586 - (800) 358-2345	
25		

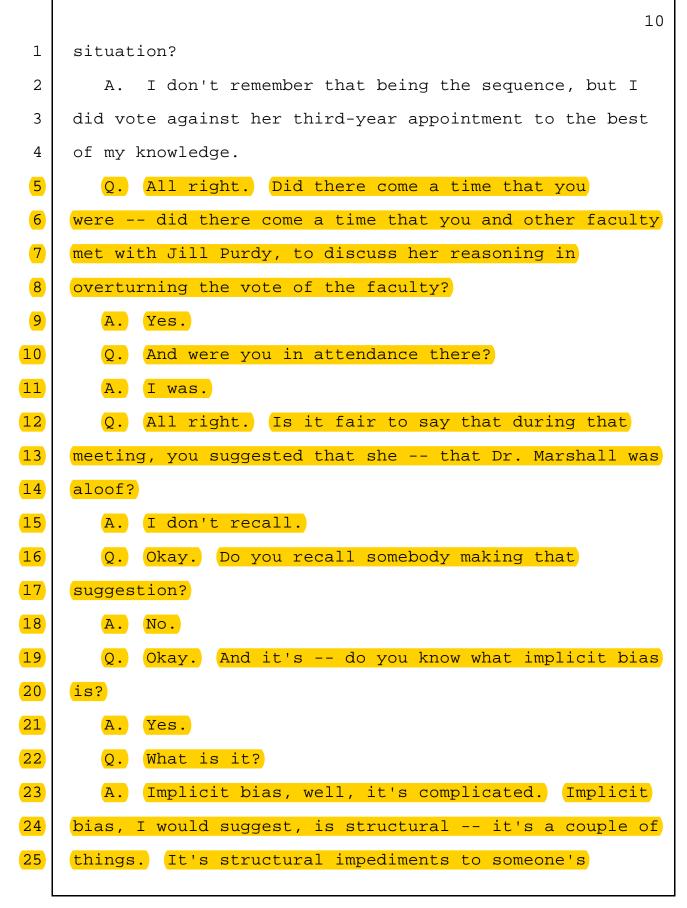
Г

	2
1	BE IT REMEMBERED that the deposition of
2	RICHARD FURMAN, Ph.D, was taken on behalf of the
3	Plaintiff, pursuant to the Washington Rules of Civil
4	Procedure before Anita Mitchell, Certified Shorthand
5	Reporter for Washington, on Tuesday, the 17th day of
6	November, 2020, in Washington State, commencing at the
7	hour of 11:30 a.m.
8	
9	
10	* * *
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

1 **APPEARANCES:** 2 3 For the Plaintiff: JOHN P. SHERIDAN 4 ANDRA KRANZLER 5 SHERIDAN LAW FIRM Hoge Building, Suite 1200 705 Second Avenue 6 Seattle, WA 98104 7 206.381.5949 206.447.9206 Fax 8 Jack@sheridanlawfirm.com Andra@sheridanlawfirm.com 9 10 11 For the Defendant: 12 13 JAKE EWART HILLIS CLARK MARTIN & PETERSON 14 999 Third Avenue, Suite 4600 Seattle, WA 98104-3188 206.623-1745 15 206.623.7789 Fax 16 Jake.ewart@hcmp.com 17 18 ALSO PRESENT: 19 Dr. Gillian Marshall - Plaintiff 20 Dr. Diane Young - Defendant Tony Dondero_- Legal Assistant 21 22 Shannon Glover - Videographer 23 BRIDGES REPORTING & LEGAL VIDEO 1312 N. Monroe Street 24 Spokane, Washington 99201 (509) 456-0586 - (800) 358-2345 25

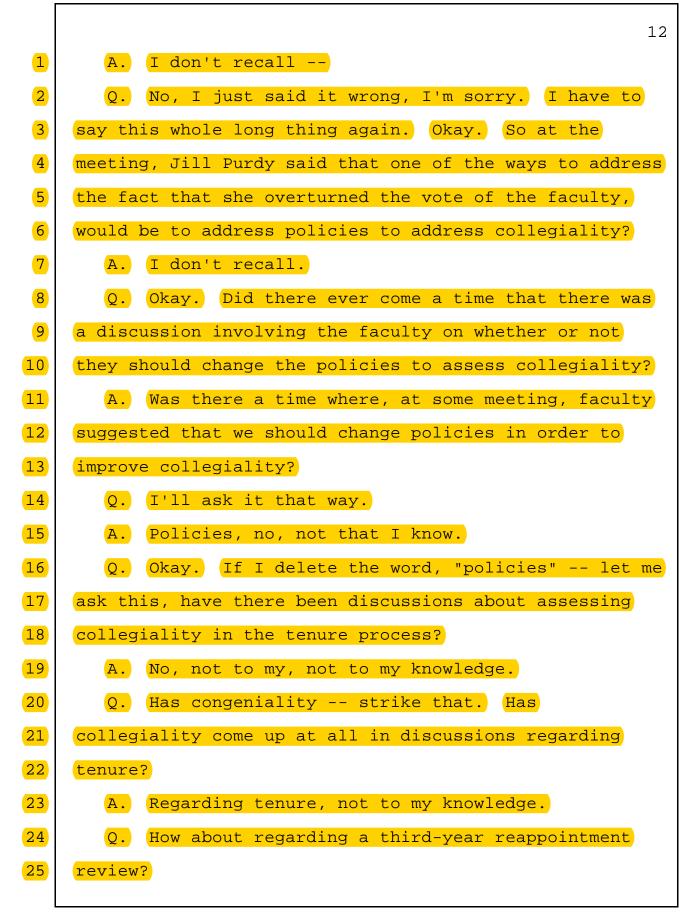
3

* * * I N D E X EXAMINATION PAGE 6 - 14 BY MR. SHERIDAN PREVIOUSLY MARKED EXHIBITS INDEX EXHIBIT NO. DESCRIPTION PAGE NO. (No Exhibits)



(509) 456-0586 BRIDGES REPORTING & VIDEO (800) 358-2345

	11
1	success, based on a protected category. It's probably
2	the best answer I can give.
<mark>3</mark>	Q. Okay. And could you tell us, at that meeting
4	that we were just discussing, where I asked you if she
5	said she was aloof, at that meeting, did Jill Purdy
6	suggest in response to, to discussions by faculty, that,
7	that one way to address this issue, the fact that she
8	had overruled your vote, is to create policies to assess
9	collegiality?
10	A. I don't know. I don't know if that those two
11	were connected in that meeting. I have no idea.
12	Q. Okay. Did there come a time that that was raised
13	as a possible solution to the problem?
14	A. What problem? You're suggesting so what I'm
<mark>15</mark>	hearing, to be clear, just so I can understand, that,
16	that during that meeting well, can you rephrase your
17	question in a way that I can answer it.
18	Q. I hope so. We'll take a shot.
19	A. Okay.
20	Q. All right. So at the meeting, is it true that,
21	that Jill Purdy said words to the effect, that one way
22	to address this concern, the fact that she had
23	overturned the vote of the faculty regarding whether
24	Dr. Marshall could continue, would be to create policies
25	to assess that assess congeniality?



	13
1	A. No. I've never heard any discussion of
2	collegiality and faculty assessment.
3	Q. Okay. How about for management or the
4	administration?
5	A. Could you say the question. I'm not clear.
6	Q. Yeah. So have you ever heard from anyone in the
7	administration, discussions regarding collegiality?
8	A. Yes, we hear discussions of collegiality all the
9	time, but not in relationship to evaluation, tenure,
10	promotion and those things, yeah.
11	Q. How about whether or not you could change some
12	aspect of the third-year appointment review to include
<mark>13</mark>	consideration as to whether or not the candidate is a
14	good fit within the organization?
<mark>15</mark>	A. Have those discussions occurred, is that
16	Q. Yes.
17	A. Not to my knowledge.
18	Q. Okay. All right. I have no further questions.
19	Thanks for your time.
20	MR. EWART: Nothing from me at this time.
21	Thanks.
22	MR. SHERIDAN: I did it. All right. See
23	everybody at 1:30. Thank you, Doctor.
24	THE VIDEOGRAPHER: This concludes this
25	concludes the video deposition of Richard Furman,

	14
1	consisting of one tape. The time is approximately 11:41
2	a.m. The original tapes of today's testimony will
3	remain in the custody of Bridges Reporting & Legal
4	Video.
5	(The deposition concluded at 11:41 a.m.)
6	(Signature Reserved)
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

2 STATE

1

3

4

STATE	OF	WASHINGTON)	
)	SS
COUNTY	OF	KITSAP)	

5 I, Anita Mitchell, do hereby certify that at the 6 time and place heretofore mentioned in the caption of 7 the foregoing matter, I was a Certified Shorthand Reporter for Washington; that at said time and place I 8 9 reported in stenotype all testimony adduced and 10 proceedings had in the foregoing matter; that thereafter 11 my notes were reduced to typewriting and that the foregoing transcript consisting of 14 typewritten pages 12 13 is a true and correct transcript of all such testimony 14 adduced and proceedings had and of the whole thereof. 15 I further certify that I am herewith securely

16 sealing the said original deposition transcript and 17 promptly delivering the same to Jack Sheridan.

18 Witness my hand at Kitsap County, Washington, on19 this 2nd day of December, 2020.

21 22

23

24

25

20

Anita Mitchell CSR NO. 2586 Certified Shorthand Reporter 16