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2 THE HONORABLE KARENA KIRKENDOLL  
3 Motion to Compel for Summary Judgment  
4 Hearing date and time: Friday, October 22 at 9 a.m.  
5  
6

7 IN THE SUPERIOR COURT OF WASHINGTON IN AND  
8 FOR PIERCE COUNTY

9 GILLIAN MARSHALL,

10 Plaintiff,

11 vs.

12 THE STATE OF WASHINGTON,  
13 UNIVERSITY OF WASHINGTON, a State  
14 Agency, DIANE YOUNG, individually, and  
15 JILL PURDY, individually, and MARK  
16 PAGANO, individually,

17 Defendants.

Case No.: 19-2-11120-3

DECLARATION OF SARAH  
HAMPSON

17 I, Sarah Hampson, make the following statement based on personal knowledge.

18 1. I am a white woman. I have a Ph.D. I worked at the School of Arts and  
19 Interdisciplinary Sciences until I resigned in 2021.

20 2. I was up for tenure the year before Gillian Marshall was up for tenure, but  
21 we had an overlap. There was a 2018 change to the faculty code that suggested that all  
22 committee members on the tenure and promotion committee had to be from the applicant's  
23 unit. I was up for tenure in the academic year 2019-2020.

24 3. In February 2020, I learned from emails that Jill Purdy was enforcing the  
25

DECLARATION OF SARAH  
HAMPSON IN SUPPORT OF REPLY  
IN SUPPORT OF MOTION - 1

SHERIDAN LAW FIRM, P.S.  
Hoge Building, Suite 1200  
705 Second Avenue  
Seattle, WA 98104  
Tel: 206-381-5949 Fax: 206-447-9206


1 2018 faculty code change. I spoke with Dr. Purdy and expressed my concern that my  
2 committee membership had included faculty from outside my unit. Jill reassured me that it  
3 would be okay for me since the committee had already been constituted and done their  
4 work and that she knew that the change was made in error.

5 4. After I spoke with Dr. Purdy, I spoke with Dr. Marshall who told me that  
6 she was not permitted to have members on her tenure and promotion committee who were  
7 not faculty at her school/unit which was the School of Social Work and Criminal justice at  
8 UW Tacoma.  
9

10 5. I am aware and approve that some of my documents may be given to the  
11 plaintiff and filed with the Court thus becoming available to the public. I waive any  
12 privacy objections associated with the documents related to my time at UW Tacoma other  
13 than the privacy of my social security number, my address and phone number, and medical  
14 information contained in my personnel file.  
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16 I declare under penalty of perjury under the laws of the State of Washington that  
17 the above statements are true to the best of my knowledge.

18 DATED this 15<sup>th</sup> day of September, 2021.

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Sarah Hampson

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**CERTIFICATE OF SERVICE**

I, Tony Dondero, certify that on October 11, 2021, I served the document to  
which this Certificate is attached to the party listed below in the manner shown.

Mary Crego Peterson, WSBA #31593  
Jake Ewart, WSBA #38655  
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- By United States Mail
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Dated this 11th day of October, 2021.

s/Tony Dondero  
Tony Dondero, Legal Assistant