

IN THE SUPERIOR COURT OF WASHINGTON  
IN AND FOR PIERCE COUNTY

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GILLIAN MARSHALL, )  
 )  
 Plaintiff, )  
 vs ) No. 19-2-11120-3  
 )  
 THE STATE OF WASHINGTON, )  
 UNIVERSITY OF WASHINGTON, a )  
 State Agency, DIANE YOUNG, )  
 individually, and TOM DIEHM, )  
 individually, )  
 Defendants. )

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VIDEOTAPED REMOTE DEPOSITION OF CHARLES EMLETT, Ph.D  
Taken at the instance of the Plaintiff

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Tuesday, November 17, 2020  
10:00 a.m. to 11:07 a.m.  
Virtual Videotaped Zoom Deposition  
Washington

Anita Mitchell, Court Reporter

BRIDGES REPORTING & LEGAL VIDEO  
Certified Shorthand Reporters  
1312 N. Monroe Street  
Spokane, Washington 99201  
(509) 456-0586 - (800) 358-2345

1                   BE IT REMEMBERED that the deposition of  
2 CHARLES EMLETT, 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 10:00 a.m.

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## APPEARANCES:

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ALSO PRESENT:

Dr. Gillian Marshall - Plaintiff  
Dr. Diane Young - Defendant  
Tony Dondero\_- Legal Assistant

Shannon Glover - Videographer  
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EXAMINATION	PAGE
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PREVIOUSLY MARKED EXHIBITS INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
No. 137	Bates Stamped 2609 Re: Qualifications	14
No. 75	E-mail Dated 4-16-18	38

1 A. No.

2 Q. How about Dr. Furman, do you recall him saying  
3 that?

4 A. I don't recall what he said.

5 Q. Would you agree with me, just sitting here today,  
6 that you found her to be aloof?

7 A. Yes.

8 Q. Okay. Fair enough. All right. And is it also  
9 true that at the meeting, in terms of, in terms of  
10 giving you and the faculty some options, is it true that  
11 Jill Purdy said -- she said that you -- I have to ask it  
12 again. Too much time passed.

13 Is it true that at this meeting in October of  
14 2018, Jill Purdy suggested that the faculty could create  
15 policies to assess collegiality, to ensure that other  
16 applicants were a good fit?

17 A. I'm sorry. You broke up during that question.

18 Q. I'll try again. Let me try again.

19 A. I didn't hear it.

20 Q. It means the record is not doing well either, if  
21 that happens. Let me try again.

22 Okay. So is it true that at the meeting with  
23 Jill Purdy, in the fall of 2018, she suggested that the  
24 faculty could create policies to assess congeniality, to  
25 make sure that applicants are a good fit or words to

1 that effect?

2 A. I don't recall that being said.

3 Q. Okay. Was there a discussion about collegiality  
4 as perhaps being something that needed to be factored  
5 in?

6 A. No, not to my, not to my recollection.

7 Q. Okay. How about being a good fit. Do you have  
8 any recollection of that?

9 A. No.

10 Q. Okay. And it's true, is it not, that by this  
11 time you certainly knew that she -- that Dr. Marshall  
12 had, had made the UCIRO complaint of discrimination?

13 A. That's probably correct in terms of chronology,  
14 but I can't be sure.

15 Q. Okay. We have other -- I think you're right,  
16 okay, but I had to ask you. All right. So then this  
17 year in 2020, Dr. Marshall actually came up for tenure,  
18 right?

19 A. Correct.

20 Q. Were you on the committee that was appointed for  
21 that purpose?

22 A. Yes.

23 Q. Okay. And who was the Chair of that committee?

24 A. Jeff Cohen.

25 Q. And is he a Full Professor in Tacoma?