

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

DR. SHERI L. KLOUDA)
)
VS.) Civil Action No.
) 4-07CV-161-A
SOUTHWESTERN BAPTIST)
THEOLOGICAL SEMINARY and)
LEIGHTON PAIGE PATTERSON)

ORAL AND VIDEOTAPED DEPOSITION OF
DR. SHERI L. KLOUDA
FEBRUARY 26, 2008

ORAL AND VIDEOTAPED DEPOSITION OF DR. SHERI L.
KLOUDA, produced as a witness duly sworn by me at the
instance of the Defendants, taken in the above styled and
numbered cause on the 26th day of February, 2008, from
8:35 a.m. to 2:50 p.m., before Archie L. Cooper,
Certified Shorthand Reporter No. 620 in and for the State
of Texas, at the offices of Harris, Finley & Bogle, P.C.,
777 Main Street, Suite 3600, Fort Worth, Texas 76102,
pursuant to the Texas Rules of Civil Procedure and the
provisions stated on the record or attached therein.

METROPLEX COURT REPORTERS
1701 RIVER RUN, SUITE 400
FORT WORTH, TEXAS 76107
(817) 336-5342

APPEARANCES

FOR THE PLAINTIFF:

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FOR THE DEFENDANT SOUTHWESTERN BAPTIST THEOLOGICAL SEMINARY:

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Mr. Shannan E. Goss
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FOR THE DEFENDANT LEIGHTON PAIGE PATTERSON:

Mr. J. Shelby Sharpe
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Fort Worth, Texas

ALSO PRESENT:

Mrs. Dorothy Patterson
Mr. Bryan James, Videographer
Mr. Jason Duesing

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	(No documents/information agreed to be furnished.)	

CERTIFIED QUESTIONS

NUMBER	PAGE/LINE
	(No questions were certified during the deposition.)

A G R E E M E N T

1
2 It is hereby agreed by and between the parties
3 hereto, through their attorneys appearing herein, that
4 this deposition may be signed before any Notary Public in
5 and for the State of Texas, and thereafter returned into
6 Court and used on the trial of this cause with the same
7 force and effect as though all requirements of the rules
8 and statutes with reference to signature and return had
9 been fully complied with.

10 It is further agreed by the parties hereto, through
11 their attorneys appearing herein, that an unsigned copy
12 of this deposition may be filed and used in lieu of the
13 original of same if the original deposition is not signed
14 and filed with the custodial attorney at the time of any
15 hearing in this cause of action and/or upon the trial of
16 this cause of action.

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1 THE VIDEOGRAPHER: We're on the video
2 record, the time is 8:35.

3 *****

4 DR. SHERI L. KLOUDA,
5 having been first duly affirmed to testify the truth, the
6 whole truth, and nothing but the truth, testified as
7 follows:

8 EXAMINATION

9 BY MR. JOHNSON:

10 Q. Dr. Klouda, I'm Roland Johnson. What's your
11 full name?

12 A. Sheri L. Klouda.

13 Q. And did I understand that you did not like to
14 be sworn also, but promised is better for you?

15 A. Yes.

16 Q. Okay. What's that based on?

17 A. That's based on Matthew -- the Book of
18 Matthew, the Sermon on the Mount, Jesus says it's
19 important not to swear by heaven and earth or by
20 anything, but rather that a man's integrity or honesty
21 should be enough or his word should be enough.
22 Essentially that's the -- the gist of it.

23 Q. Okay. Is that a part -- Book of Matthew part
24 of the gospel?

25 A. Yes.

1 Q. And that's a part of the bible?

2 A. Yes.

3 Q. And you believe the bible is the infallible
4 and inerrant word of God?

5 A. I do.

6 Q. And you are willing to abide by any of the
7 verses in the bible?

8 A. I am.

9 Q. Okay. Tell me your husband's name.

10 A. William Klouda.

11 Q. And your daughter's name?

12 A. Abigail Klouda.

13 Q. And tell me about your marital history,
14 family history with your husband and family, please.

15 A. We married in 1986. I helped him raise two
16 children. After about nine years we got pregnant, we had
17 Abigail. We've lived in Ohio up until 1994, moved to
18 Dallas, Texas, to be near family since I now had a
19 daughter and she needed to know her grandparents and --
20 and great-grandparents. Went to school at Criswell
21 College and lived originally Rockwall, moved to Forney,
22 and eventually moved to Arlington later on.

23 Q. Okay. Has all of your post-bachelor -- well,
24 where did you get your bachelor's degree?

25 A. I earned my bachelor's degree at the Criswell

1 College.

2 Q. In what line of study?

3 A. A BA in biblical studies.

4 Q. And you had a master's in what from where?

5 A. A master's in Old Testament from the Criswell
6 College.

7 Q. And then your doctorate?

8 A. My doctorate was earned at Southwestern
9 Baptist Theological Seminary.

10 Q. And which school?

11 A. The School of Theology.

12 Q. And what specialty or degree?

13 A. I guess it would be considered theology,
14 although my focus was on the Old Testament.

15 Q. Have you done any -- enrolled in any school
16 outside of the Metroplex area?

17 A. Outside of the Metroplex? I have done some
18 work at Jewish Theological Seminary of America. Before I
19 started my formal bachelor's work I had taken some
20 courses through a small seminary in Liverpool, New York,
21 which is now defunct, and those courses were transferred
22 to Criswell College. So I guess that would -- that would
23 summarize the schools that I have been --

24 Q. When did you enroll in the Jewish Theological

25 --

- 1 A. Well, --
- 2 Q. -- Seminary of America?
- 3 A. -- there was never a formal enrollment, but I
- 4 did study with a professor there and I did receive a
- 5 grade from him, but it was an independent study. It was
- 6 not a formal enrollment.
- 7 Q. When?
- 8 A. Oh, let's see, that would probably have been
- 9 2003 to 2004 and then 2004 to 2005.
- 10 Q. Was that during the summers?
- 11 A. No, that was while I was working at
- 12 Southwestern as an elected faculty member. I was doing
- 13 that work for professional development reasons in
- 14 conjunction with my normal -- you know, in order to be
- 15 more -- to supplement various areas that I did not have a
- 16 benefit of in my doctrinal work and just to make myself
- 17 better qualified to teach.
- 18 Q. Did you find the fact that you had only
- 19 enrolled in schools in the Metroplek area -- Metroplex
- 20 area limiting in your job search when you left the
- 21 seminary?
- 22 A. I don't know.
- 23 Q. Have you ever been in a lawsuit before?
- 24 A. No.
- 25 Q. Have you ever thought about filing a lawsuit

1 before other than this one?

2 A. No.

3 Q. Have you ever made a claim against a person
4 before?

5 A. No.

6 Q. How old is your daughter?

7 A. She is going to be seventeen in June.

8 Q. Will she be able to go to Taylor University
9 as a free tuition as a part of your working there?

10 A. If that's her desire.

11 Q. Is that a benefit that is allowed you as
12 someone on faculty there?

13 A. Well, if they meet the admission criteria and
14 so forth, but, yes.

15 Q. What is the cost of tuition?

16 A. Approximately --

17 Q. Books, room, board?

18 MS. MERICA: Wait until he finishes the
19 whole sentence -- the whole question before you answer.

20 THE WITNESS: Okay.

21 BY MR. JOHNSON:

22 Q. What is the value of that benefit that she
23 can attend school there, in your opinion?

24 A. About \$24,000.00, something around that area.

25 Q. Per year?

1 A. Yes.

2 Q. Per nine-month period of time?

3 A. Yes.

4 Q. Has your husband ever been in a lawsuit
5 before?

6 A. I -- I don't know if it's really a lawsuit.
7 I'm not really sure how to -- he had a difference in --
8 of opinion with regard to damage to his vehicle. I don't
9 know if that's considered to be a lawsuit. I mean we
10 didn't actually go to court or anything.

11 Q. Was a lawsuit filed?

12 A. I don't think so, but I can't -- I can't be
13 sure. I think we just had the attorneys talking. It was
14 settled or, you know, resolved.

15 Q. When was that?

16 A. I don't know. It was in the 1980s.

17 Q. Where was that?

18 A. In Ohio.

19 Q. Okay. Have you ever sought counsel of a
20 lawyer prior to the filing of this lawsuit?

21 A. No.

22 Q. When is the first time you talked to a lawyer
23 related to this lawsuit?

24 A. Probably January or February of 2007.

25 Q. Okay. Who -- who have you talked to related

1 to this claim you're making against the seminary?

2 A. Cindy Bourland and Gary Richardson.

3 Q. No other law firms involved than their firms?

4 A. No.

5 Q. Okay. Tell me about your position at Taylor.

6 A. I teach undergraduate students introductory
7 courses that are nonlanguage. I do teach a Hebrew
8 course, but it's not a requirement or anything such as
9 that except for a small number of students, so a it's
10 relatively small class and that's what I do.

11 Q. What are the nonlanguage classes that you
12 teach?

13 A. Survey of the Old Testament, Survey of the
14 New Testament, and Inductive Bible Study.

15 Q. Do you teach the interpretation of the Old
16 Testament or New Testament?

17 A. No.

18 Q. Or of the bible?

19 A. No.

20 Q. Are you on a -- what is your -- are you on a
21 tenure track?

22 A. Yes.

23 Q. Describe what a tenure track means to you
24 there at Taylor.

25 A. Well, provided that one has a reasonable

1 expectation of continued employment if one -- if job
2 performance is satisfactory and scholarly or professional
3 development is satisfactory and if one doesn't -- and
4 one's behavior is -- one behaves in such a way as to
5 provide a good model to the other students from a moral
6 and ethical standpoint.

7 Q. Is there any spiritual or ministerial
8 component to the tenure track?

9 A. No.

10 Q. Was that something that was different when
11 you were at the seminary versus where you are now at
12 Taylor?

13 A. It is somewhat significantly different. I
14 guess I do want to say that there is a sense in which
15 tenure would -- at Taylor would involve -- would include
16 community service, which is not necessarily with the
17 church. So you need to do community service and you --
18 it's important to demonstrate some service to the Taylor
19 students and some service perhaps in a church setting as
20 well.

21 Q. Is the tenure track that you described at
22 Taylor, is it reduced to writing in a bylaw or a handbook
23 or a manual?

24 A. I do believe they have a written policy.

25 Q. And you are willing to abide by whatever is

1 in their bylaws or manuals about that?

2 A. Yes.

3 Q. The same question for the bylaws and manuals
4 and handbooks at the seminary as it speaks to tenure.

5 A. Well, I don't know how -- as it speaks to it
6 now, I don't know what is different in it now compared to
7 what was -- what it was when I first started there versus
8 when it changed, then it's gone through evolutions and
9 changes, and so I don't know that I can make that
10 statement necessarily.

11 Q. Okay. How was it at the seminary when you
12 first started?

13 A. I really enjoyed it a lot. I, of course --
14 well.

15 Q. As it relates to tenure, how did the bylaws
16 and the manuals and the handbooks relate to tenure when
17 you first started? I thought I understood you said it
18 was started one way in writing and changed while you were
19 there.

20 A. Yeah, there were different changes.

21 Q. Tell --

22 A. The manual changed each year, so I don't know
23 what the form is now compared to what it was.

24 Q. I'm -- I'm not asking about the form now.
25 I'm asking about the form when you were there at the

1 seminary. Are you willing to abide by the bylaw words,
2 the handbook and manual words as it relates to tenure at
3 the seminary while you were at the seminary?

4 MS. MERICA: Objection to form. Go ahead
5 and answer the question.

6 THE WITNESS: Yes.

7 BY MR. JOHNSON:

8 Q. Is there any part of the bylaws as they
9 existed when you were at the seminary or the faculty
10 handbook or manual when you were at the seminary that you
11 are not willing to abide by?

12 A. No.

13 Q. Did you have any agreement in writing with
14 the seminary as it relates to your employment other than
15 the bylaws and the faculty manual or handbook?

16 A. I believe that each year we signed a form
17 that had essentially the salary and benefits for the next
18 year.

19 Q. Okay.

20 A. We had to sign that by July 31st, if I'm
21 correct. I believe that's the case.

22 Q. Anything else that you say that's in writing
23 that relates to your terms of employment at the seminary?

24 A. Not that I can recall.

25 Q. Okay. So if I understand it, you would be

1 willing to say that it's the bylaws, the faculty handbook
2 or manual, and then the letter that you just mentioned,
3 those are the things in writing that govern the terms of
4 your employment when you were at the seminary?

5 MS. MERICA: Objection, form.

6 THE WITNESS: Yes.

7 (Exhibit No. 15 marked)

8 BY MR. JOHNSON:

9 Q. I'm going to show you what I have marked as
10 Exhibit No. 15. Have you seen that before?

11 A. Yes.

12 Q. Would you identify it for the judge and jury,
13 please?

14 A. It's the Original Complaint And Request For
15 Declaratory Judgment And Jury Demand.

16 Q. Did you see this before it was filed?

17 A. Probably.

18 Q. Were you --

19 A. It gets to a point where things are filed
20 quicker than I ever get to see them, so I would -- I
21 assume I did, but I'm not sure.

22 Q. Well, I'm asking about this particular
23 document that began the lawsuit.

24 A. I assume I did, but I'm not -- you know, I
25 couldn't a hundred percent guarantee.

1 Q. What would it take for you to know whether or
2 not you saw it and okayed it before it was filed?

3 A. Probably if counsel affirms that I saw it
4 ahead of time. The documents are getting to be so many
5 it's difficult to remember what I've seen and what I
6 haven't seen.

7 Q. Well, do you have a practice of -- of the
8 pleadings that are filed in this lawsuit, have you had a
9 practice of reviewing them before they're filed to see if
10 they're accurate?

11 A. Yes, I think in most cases.

12 Q. Okay, turn to page three. Do you see it
13 starts on page three called Statement of Facts? And
14 thumb through to page seven to see where those Statement
15 of Facts continue. Do you -- do you see that section of
16 this exhibit?

17 A. Yes.

18 Q. Okay. After looking at that section do you
19 recall having seen the Statements of Fact and believe
20 that those are accurate before the filing of this
21 pleading?

22 A. Please rephrase your question now that I've
23 read it.

24 Q. Sure. Do you believe that you had a chance
25 to review that section of the pleadings to confirm that

1 those Statement of Facts were accurate prior to filing
2 it?

3 A. Yes.

4 Q. And you believe those to be true?

5 A. Yes.

6 Q. Before the filing?

7 I'm sorry, I just need an answer for the
8 court reporter.

9 A. I said yes.

10 Q. Thank you.

11 (Exhibit No. 16 marked)

12 BY MR. JOHNSON:

13 Q. I'm going to show you what's been -- being
14 marked as Exhibit 16. Will you familiarize yourself with
15 that, please? Would you identify what it is?

16 A. Yeah, it's the first amended complaint -- my
17 first amended complaint.

18 Q. And do you believe that you had a chance to
19 review the accuracy of this document before it was filed
20 with the federal court?

21 A. Probably.

22 Q. Okay. Would you look at the same section
23 that I asked you to earlier? It begins on page three
24 again and goes to the bottom of page seven, the Statement
25 of Facts section. Does that look familiar to you?

1 BY MR. JOHNSON:

2 Q. Okay, I'm going to show you what's being
3 marked as Exhibit No. 17. If you would familiarize
4 yourself with that, please. Can you identify it?

5 A. It is the second amended complaint.

6 Q. Do you believe you had a chance to review the
7 accuracy of Exhibit 17 before it was filed?

8 A. Yes, I assume so.

9 Q. And after having had a chance to look at the
10 Statement of Facts section on Exhibit 17, are there any
11 corrections that need to be made on it?

12 A. Probably it would be important to note that
13 the same sorts of changes on these other documents that
14 have been just brought over.

15 Q. The ones that you've mentioned this morning?

16 A. The ones I've already mentioned.

17 Q. Anything other than what you've mentioned?

18 A. No.

19 Q. Otherwise, you believe 17 Statement of Facts
20 to be true and accurate?

21 A. That's correct.

22 (Exhibit No. 18 marked)

23 BY MR. JOHNSON:

24 Q. I'll show you what's being marked as Exhibit
25 No. 18 and ask for you to familiarize yourself with it,

1 please. I'll represent to you that at one time in this
2 claim that you've made against the seminary, a complaint
3 was filed in another court -- another judge's court in
4 the Northern District of Texas, Fort Worth Division, and
5 this is the complaint in that lawsuit. Are you aware
6 that that happened?

7 A. I'm not -- I don't know how to answer that
8 question. I'm not sure what you're asking.

9 Q. Okay. Have you seen Exhibit 18 before?

10 A. Yes, I believe so.

11 Q. Okay. After having a chance to look at this
12 Statement of Facts section on Exhibit No. 18, are there
13 any corrections that you think need to be made to it
14 other than what you have already mentioned this morning?

15 A. All -- just what I've mentioned this morning.

16 Q. Okay. If you'd pull out the No. 17 one,
17 please.

18 A. (Request complied with.)

19 Q. Is that -- does that have --

20 A. Yes.

21 Q. -- the second?

22 A. Uh-huh.

23 Q. Turn to the Statement of Facts section and
24 tell me when you first thought that you might have a
25 chance to teach at the seminary.

1 A. I was already teaching at the seminary in
2 2000 as -- as a teaching -- they commonly called a
3 teaching fellow, but essentially it's similar to an
4 adjunct, although you don't receive adjunct pay at that
5 point.

6 Q. Do you receive more or less than adjuncts?

7 A. Less.

8 Q. Okay. What -- what title did you give to
9 that teaching?

10 A. That was just a teaching fellow.

11 Q. A teaching fellow?

12 A. Uh-huh.

13 Q. And when did that begin?

14 A. In 2000. I believe the summer of 2000.

15 Q. And how long did you continue as a teaching
16 fellow?

17 A. All the way through my election to full-time
18 faculty.

19 Q. And when was that?

20 A. In April of 2002.

21 Q. And when did you first think that you might
22 teach at the seminary as a part of the elected faculty?

23 A. Probably at a conversation about that in
24 January of 2002.

25 Q. Tell me about that conversation.

1 A. My husband had just had triple bypass
2 surgery. My father was diagnosed with pancreatic cancer.
3 My mother was going through a terrible time. We were
4 originally slated to take a position at another
5 institution on my graduation from the seminary and I
6 spoke to one or two of my colleagues who were my
7 superiors and mentioned to them or asked them if there
8 was any way or, you know, if there was any possibility of
9 my being able to fill a permanent role at the seminary
10 with regard to teaching so that we did not have to move
11 away because we would had to have moved quite a distance
12 away and we were just in a terrible time.

13 Q. And you were asking for help from the
14 seminary to consider that?

15 A. Well, I asked -- I asked -- I talked to a
16 couple of colleagues with regard to the possibility that
17 this was even a viable option.

18 Q. Who did you talk to?

19 A. Dr. Paul Wolfe and Dr. George Klein.

20 Q. George Klein?

21 A. Klein, K-l-e-i-n.

22 Q. Tell me about your conversations with them,
23 please.

24 A. I asked them -- I told them of my
25 circumstances with regard to my husband's health and my

1 family and asked them if it were viable or if it were a
2 possibility that I could be considered for an Old
3 Testament or a -- pardon me, a teaching position --
4 full-time elected teaching position at the seminary. We
5 had need for somebody in Biblical Languages.

6 Q. What did they say?

7 A. That they would -- that they would talk to
8 Dr. Blaising.

9 Q. Anything else you remember about your
10 conversations with Dr. Wolfe or Dr. Klein?

11 A. No.

12 Q. Did you ever talk to Dr. Blaising yourself
13 during that initial time period?

14 A. No, I waited. If he wanted to contact me --

15 Q. What --

16 A. -- for any further, he would.

17 Q. What -- excuse me. I don't want to cut into
18 your answers.

19 A. No, that's all.

20 Q. Any -- any other conversations with Wolfe or
21 Klein at that juncture?

22 A. No.

23 Q. What happened next?

24 A. Eventually I was contacted by Dr. Blaising's
25 office and I don't recall the conversation with him, but

1 a -- an interview was arranged and we went through that
2 interviewing process. I had to answer some questions
3 with regard to the Baptist Faith and Message and do
4 whatever all else was necessary to prepare for that
5 interview.

6 Q. Who was present at the interview?

7 A. One of the trustees. Let's see, there were
8 two parts of the interview. One part Dr. Hunt, Dr.
9 Klein, Dr. Hemphill, Dr. Blaising, one of the trustees, I
10 believe that's about it, and myself. And then all were
11 dismissed except for Dr. Blaising, the trustee, Kent
12 Hemphill and myself.

13 Q. What happened during the first part? You
14 said it was two-part. I take it the first group you
15 mentioned was the first part?

16 A. Yeah, and that was more in terms -- that was
17 more of a meal where every -- you know, where -- which is
18 typical of the interview process. You get to go sit down
19 and have a meal, although since you're the one being
20 interviewed you don't really actually get to eat the
21 meal.

22 Q. You're answering questions?

23 A. Yes.

24 Q. Okay. Anything you remember of importance
25 from that meal portion of the interview process?

1 A. Nothing significant other than a little bit
2 of talk with regard to my research and writing, but
3 nothing overly significant.

4 Q. And then what happened in the second part
5 when you said it was Dr. Blaising, Dr. Klein and a
6 trustee?

7 A. Klein was not there, Dr. Hemphill.

8 Q. Dr. Hemphill?

9 A. The president.

10 Q. And Dr. Blaising and a trustee?

11 A. That's correct.

12 Q. Who was the trustee?

13 A. I -- his -- I was trying to remember his name
14 this morning. I would recognize it. I cannot -- I
15 cannot recall it right this minute. I had no way to --
16 no way to look at a list to recall it for this.

17 Q. And what happened in that portion of the
18 interview?

19 A. We talked about the Baptist Faith and
20 Message, we talked about my answers to the various
21 questions, talked about how I viewed my -- would view a
22 position there as a faculty member. Those were the kinds
23 of things that we discussed.

24 Q. Okay.

25 A. Pretty much.

1 Q. Anything else that you remember of
2 importance? Pardon?

3 A. Nothing -- nothing unique.

4 Q. Okay. What happened next in the interview
5 process?

6 A. Well, the interview process lasted a couple
7 of hours and then I went home.

8 Q. Then what?

9 A. Then eventually I received a call from Dr.
10 Blaising. Oh, no. Yeah, I believe I received a call
11 from Dr. Blaising letting me know that -- that the
12 meeting had gone well and that Dr. Hemphill was -- or Dr.
13 Blaising was going to present me as a candidate for
14 election to the faculty.

15 Q. And what would be -- what process would that
16 follow?

17 A. I don't know the finer points of all of that.
18 I assume Dr. -- well, I shouldn't assume anything. I
19 don't know the finer points of it. What I am aware of is
20 that Dr. Blaising in some way presents those candidates
21 and then they are voted on by the trustees.

22 Q. What did you actually participate in next
23 yourself?

24 A. Probably ate lunch with the trustees and
25 various faculty members during the trustees' meeting in

1 April.

2 Q. Okay. What else did you do besides -- what
3 did you do next in participation in the process?

4 A. Wait outside to be asked questions, if
5 necessary, by the trustees.

6 Q. Were you asked questions?

7 A. No.

8 Q. What happened next?

9 A. Then I left and I went and taught a class.

10 Q. Okay. What happened next in terms of the
11 election process?

12 A. Well, I had several trustees that I can
13 recognize by face, but not name, so if I have the faces I
14 could tell you who they are not knowing all the trustees
15 by name. Come up to me and congratulate me and tell me
16 and give me welcome to the seminary. I didn't actually
17 hear the result until later on after the vote was taken.
18 I think Dr. Klein was there and I was on break from class
19 and he mentioned that I had been elected. Other than
20 that, I didn't receive any formal word right away.

21 I got home, my phone was ringing off the hook
22 with news people, and then it was maybe -- I don't
23 remember if -- I don't believe it was that day, but was
24 probably a day or two later when Dr. Blaising -- maybe
25 the next day when Dr. Blaising told me of the decision

1 and we talked about the parameters of my
2 responsibilities.

3 Q. Tell me about that conversation, please.

4 A. He told me that I'd been elected. He told me
5 that there were a couple of trustees who had concerns and
6 in order to best meet those concerns, that we would limit
7 the classes...that I would teach two language classes.

8 Q. And what would those language classes be
9 entitled? Which ones?

10 A. Introductory of Biblical Hebrew I and II,
11 Aramaic, Ugaritic, Dead Sea Scrolls, Exegetical Method --
12 Hebrew Exegetical Method. And essentially that would be
13 -- those would be the classes. I did eventually teach
14 exegesis, but that was by assignment and I -- that was
15 later on, but exegetical method.

16 Q. And so the ones you just told me ending with
17 exegetical method were the limitations that were placed
18 at the beginning?

19 A. Right, that I wasn't to teach exposition or
20 English bible essentially.

21 Q. Now specifically it was the list of classes
22 that you gave me --

23 A. Well, no.

24 Q. -- ending with --

25 A. No, no, it was the statement that he -- that

1 is contained that we looked at yesterday that talks about
2 -- I mean that was what he said, but these were the types
3 of classes that would be permissible or that is helpful.
4 These are the types of classes that are permissible, but
5 it was the statement as is set forth with regard to my
6 limitations that Dr. Blaising perhaps put in his
7 affidavit or -- I'm not sure where that is.

8 Q. Okay. Did you ever go teach things other
9 than Hebrew I and -- beginning with the list of Hebrew I
10 and II that you gave me that ended with exegetical
11 method? Did you ever teach classes outside of that?

12 A. Eventually I taught an exegesis class or
13 Hebrew reading class, but that was later and that was by
14 assignment. That wasn't anything that I initiated.

15 Q. Did those assignments go back to the board of
16 trustees at Southwestern?

17 A. I don't know that they did. I know -- I know
18 they were approved by Dr. Blaising, otherwise I wouldn't
19 have been permitted to teach them.

20 Q. Did you ever teach anything related to the
21 exposition?

22 A. No.

23 Q. Did you ever interpret the bible?

24 A. No.

25 Q. You would say with a hundred percent

1 authority that none of your class notes and none of your
2 students would say that you ever taught exposition or
3 mentioned exposition or interpreted the bible?

4 MS. MERICA: Objection, form.

5 THE WITNESS: I would say that my students
6 would say the second that I didn't -- that they -- I did
7 mention exposition, but only with the -- with the goal of
8 explaining how method was important for exposition.

9 BY MR. JOHNSON:

10 Q. And so you did teach about how exegesis
11 related to exposition?

12 A. Yes, but in a very technical way.

13 Q. Do you have -- did you teach with notes?

14 A. Not particularly.

15 Q. Do you teach by manuscript?

16 A. Mostly textbook.

17 Q. Do you have the notes --

18 A. The Hebrew bible.

19 Q. Do you have notes or manuscripts related to
20 the classes you taught at the seminary?

21 A. I might have some.

22 Q. Did you allow students to tape?

23 A. I never had a problem with a student taping
24 anything.

25 Q. Okay. Did some students tape your classes?

1 A. Yes.

2 Q. Did you ever teach small group spiritual
3 formation?

4 A. Yes.

5 Q. Was small group spiritual formation a part of
6 the -- within the limits that you have described?

7 A. Yes, because it was directed -- it was all
8 women.

9 Q. You never had spiritual formation classes
10 that included any men?

11 A. No, I did not.

12 Q. Was that a class for credit?

13 A. Yes.

14 Q. Tell me what happened next with Dr. Blaising.

15 A. After what?

16 Q. After you last said you met with him.

17 A. You mean after he called me with regard to
18 the parameters of my job?

19 Q. Yes.

20 A. I can't recall when the next meeting would
21 have been.

22 Q. Okay. What do you recall as next happening
23 related to your election at the seminary in 2002?

24 A. Just I was advised by my colleagues to be
25 circumspect in every way and to strive to serve the

1 contingency and not make any problems.

2 Q. Who told you that?

3 A. Paul Wolfe, George Klein. Also not talk to
4 the news media.

5 Q. They said not talk to the news media?

6 A. Yeah, we don't talk to them.

7 Q. Did you?

8 A. No.

9 Q. Have you ever talked to the news media about
10 your time at the seminary?

11 A. Sure.

12 Q. When?

13 A. There was a point sometime while I was an
14 elected faculty member at Southwestern when I signed a
15 Baptist Faith and Message 2000 at my election and a
16 question was asked about that and I expressed my -- the
17 honor that I felt in doing so and my affirmation of it
18 and such as that.

19 Q. Any other times that you talked to the media?

20 A. Not until -- not that I recall until January
21 or February of 2007.

22 Q. Your colleagues that were your superiors at
23 the seminary had asked you not to speak to the media?

24 A. Well, they -- they at first told me not to on
25 my initial election, but they also said that if I were

1 approached by the media during my time at Southwestern,
2 that I should go through Public Relations and make sure
3 that it's cleared and so on and so forth and did receive
4 approval, not to speak on behalf of the seminary and such
5 as that without receiving approval.

6 Q. And that's what you did?

7 A. Yes.

8 Q. Any other talk that you remember about your
9 terms or conditions or your being elected to the faculty
10 at Southwestern other than what you've told me about?

11 A. For my election, you mean?

12 Q. During this election process and when you
13 began to work there at Southwestern during the --

14 A. Well, --

15 Q. -- 2002 period.

16 A. It's difficult because I never stopped
17 working there. I'd already been working there since 2000
18 to 2001 to 2002 I taught eighteen hours, so I was working
19 two hours short of full-time.

20 Q. Okay. Now --

21 A. So I never stopped working there.

22 Q. So as you made the transition from being a
23 teaching fellow to being on the elected faculty, I'm
24 interested in knowing whether or not you had any other
25 conversations that you remember about your terms of

1 employment or your working at the seminary as a part of
2 the elected faculty other than what you've told me about
3 this morning?

4 A. Not that I can recall.

5 Q. What happened next after you were elected?

6 A. I filled out paperwork. I do recall that Dr.
7 Blaising began paying me a little bit early with regard
8 to my time there, the summer before I actually -- the
9 summer before I actually began formal classes in order to
10 help us with regard to benefits. My husband, as I say,
11 this was the time he was recovering from heart surgery,
12 my dad was dying and so forth, you know, so -- and
13 financially we were struggling. He'd take off so much
14 time when you have heart surgery and I -- what I was
15 making at the seminary was very small.

16 Q. Is that -- you're telling me they started
17 paying you as if you were elected faculty before --

18 A. Yes.

19 Q. -- the fall?

20 A. Yes.

21 Q. And is that something you asked for or is
22 that something they helped with on their own?

23 A. I believe he helped with it on his own. I
24 didn't ask him to do that.

25 Q. Anything else about -- that you remember

1 conversations or meetings or otherwise about the terms of
2 your employment of the elected faculty that you haven't
3 told me about?

4 A. No.

5 Q. Okay. Then what happened next? The fall of
6 2000 began?

7 A. Yeah, it's -- you know, the paperwork was
8 filled out and all the normal things of employment during
9 the summer. I probably did receive a faculty manual at
10 some point in time and I was scheduled for classes, began
11 my work.

12 Q. And you're not asking to be exempted from the
13 terms and conditions of the faculty manual at anytime
14 while you were at Southwestern, are you?

15 A. No.

16 MS. MERICA: Objection, form.

17 BY MR. JOHNSON:

18 Q. Was there any component of your work as a
19 part of your work as elected faculty that concerned
20 itself with the interpretation of the bible?

21 A. No, unless it had to do with my own personal
22 writing, which -- scholarly writing, but with regard to
23 classroom interaction and such as that, no.

24 Q. Did you consider it a part of your job or not
25 to share your calling in faith with your students?

1 A. I never preached or anything like that in
2 class or outside of class or anywhere.

3 Q. I'm not --

4 A. If that's what you're asking.

5 Q. I'm not asking if you got behind a pulpit and
6 preached as a supply pulpit or anything like interim
7 pastor or anything else. Did you consider it to be a
8 part of your responsibilities as a professor at
9 Southwestern Baptist Theological Seminary to share your
10 calling or faith with students?

11 A. I'm not exactly sure how to answer the
12 question because I'm not sure what you're asking. Could
13 you rephrase it, please?

14 Q. Did you consider it a part of your
15 responsibilities as an elected faculty at Southwestern to
16 share with your students your calling to the seminary or
17 your faith as it relates to your understanding and
18 interpretation of the bible?

19 A. I shared my calling with the trustees at my
20 election. I don't know that I ever shared that with the
21 students. And as far as spreading faith or teaching
22 faith, faith can't be taught.

23 Q. I asked did you consider it a part of your
24 responsibilities --

25 A. To teach faith?

1 Q. -- to share -- to share that -- your faith
2 with your students?

3 A. I suppose so.

4 Q. How did you do that?

5 A. By my behavior, by being in harmony with the
6 principles as outlined in the Baptist Faith and Message.

7 Q. Would you include in harmony with the bible?

8 A. Yes.

9 Q. Was there a component of your
10 responsibilities with the elected faculty at the seminary
11 to have any ministerial component?

12 A. No.

13 Q. Was there any spiritual component to your
14 responsibilities?

15 A. No, other than teaching the spiritual
16 foundations class and maintaining my own personal
17 spiritual life.

18 Q. Did you consider yourself to be in the
19 ministry of teaching future pastors of the Southern
20 Baptist Convention?

21 A. I was -- I served the students at
22 Southwestern.

23 Q. Did you consider yourself to be in the
24 ministry of preparing future pastors of the Southern
25 Baptist Convention?

1 A. I considered that my area of service.

2 Q. Do you agree with the Baptist Faith and
3 Message statement that men are to be pastors?

4 A. Yes.

5 Q. Do you agree with the bible as it speaks to
6 the role of women that we talked about yesterday during
7 the deposition?

8 A. Yes.

9 Q. I understand you have never been a pastor or
10 minister at a local church. Is that right?

11 A. That's correct.

12 Q. Have you ever preached?

13 A. No.

14 Q. You never talked or stood behind a pulpit at
15 a local church?

16 A. Maybe back many years ago like to talk about
17 working with college students or Sunday School things or
18 something like that, but many -- it would have been --
19 wouldn't have even been in Texas. It would have been in
20 Ohio.

21 Q. What does the word ministry mean to you as it
22 relates to your calling?

23 A. Doing the best to my ability to serve my
24 constituencies, my colleagues and my students.

25 Q. And who is your constituencies?

1 A. The trustees of the Southern Baptist
2 Convention.

3 Q. And did you consider that you took part in
4 any ministry related to your elected faculty position at
5 Southwestern?

6 MS. MERICA: Objection, form.

7 THE WITNESS: No.

8 BY MR. JOHNSON:

9 Q. As a part of you accepting to become on the
10 elected faculty at the seminary, are there any other
11 conversations that relate to that period of time before
12 we go forward that you haven't told me about this morning
13 that you know of?

14 A. With regard to my election?

15 Q. Your election and your accepting to become an
16 elected faculty person at the seminary.

17 A. No, I don't believe so.

18 Q. Okay. When did you and your husband buy your
19 home in Arlington?

20 A. July of 2003.

21 Q. You have sued the seminary for breach of
22 contract. What -- what is that contract?

23 A. The reasonable expectation that because I was
24 elected to tenure track, that if I performed my duties on
25 a regular basis and I did not teach against or contrary

1 to the Baptist Faith and Message and that I served in my
2 role as teaching biblical language and method according
3 to the parameters that had been laid out.

4 Q. Anything else?

5 A. No, that's -- no, I don't think so.

6 Q. You have sued the seminary for fraud. What
7 do you say that the seminary fraudulently did to you?

8 A. I think that -- well, first of all, they did
9 not follow through with the tenure process only on the
10 basis of my gender. They had never told me that my
11 gender was ever an issue, not -- not -- I mean with
12 regard to my being on tenure track, that it was a
13 problem. And that the failure to follow through was --
14 the failure to follow through on the process and
15 dismissing me or -- well, they didn't actually dismiss
16 me, but -- until much later, but I was under the -- I was
17 under the understanding that as long as I did my job well
18 and didn't cause any problems and met the professional
19 requirements and met my scholarly requirements, academic
20 requirements, didn't -- didn't engage in anything -- any
21 moral -- morally reprehensible behavior, ethical conduct
22 that was inappropriate, that I had just as much -- just
23 as much rights or just as -- should be considered equally
24 with other faculty members and judged with the same
25 criteria and so forth.

1 Q. Anything else?

2 A. They did not clearly express to me that they
3 were going to terminate me until quite awhile down the
4 road, so they led me to believe that there were no limits
5 with regard to the time period that I would serve as a
6 professor apart from that which normally would be
7 considered for tenure track.

8 Q. Anything else?

9 A. Not that I could think of right at this
10 minute.

11 Q. And who are the persons that -- are those
12 things you just told me about your beliefs that the
13 seminary has committed fraud, are those in writing or are
14 those oral?

15 A. Well, have what in writing or what oral? I'm
16 not sure what you're asking.

17 Q. I asked you what you thought was done
18 fraudulently by the seminary and you answered. Correct?

19 A. Yeah, but --

20 Q. When -- is -- are the things that you say
21 they did false to you in writing?

22 A. You mean did they keep records of these
23 things?

24 Q. No, did they make any false representations
25 to you in writing?

1 A. I would say that on the basis of the tenure
2 track policy, that it does not state anywhere in there
3 that gender is -- is sufficient reason to terminate a
4 person.

5 Q. Anything else in writing?

6 A. No, I guess not. I mean not that I recall.

7 Q. And the time period for the -- when did these
8 fraudulent things happen? When do you say that those
9 representations were made to you?

10 A. Well, I first began to get a sense that there
11 was a problem as early as June of 2004, but I sought to
12 try and remediate that in some way.

13 Q. What happened in June of 2004?

14 A. I had a discussion with Paul Wolfe on June
15 7th. He told me that he -- his understanding of Dr.
16 Patterson's personal position with regard to women
17 teaching in the School of Theology, that his philosophy
18 differed and that it was unlikely that he was going to
19 recommend me for tenure. But, of course, we know that
20 Dr. Patterson has never elected anybody to tenure, so it
21 didn't necessarily mean that I couldn't continue on a
22 tenure track. I was in fact never taken off the tenure
23 track.

24 Q. Anything else that Dr. Wolfe told you on June
25 7th of 2004?

1 A. I asked him about -- at first I wasn't really
2 sure whether this meant that I was losing my job or that
3 I needed to leave. He said I -- there was no problem
4 with my continuing teaching, there was no problem with
5 continuing to teach the things that I was scheduled to
6 teach. He did say that it was important that -- that my
7 continuing to teach there was in some ways dependent upon
8 the administration -- of it not being known -- that
9 nobody knew -- the administration would prefer that it
10 not be known, that I would -- that the president would
11 not -- would not recommend me on the basis of my gender.

12 As I say, I asked about looking about -- you
13 know, the possibility of looking for a job. I was
14 welcome to do that, but there was no definitive time
15 period or I wasn't told I had to leave at a certain time
16 or I would stop teaching at a certain time or my contract
17 would be up at a certain time or anything like that.

18 Q. Anything else?

19 A. Well, he did say to me and he said it for
20 quite awhile, that my -- that I shouldn't take Dr.
21 Patterson's view wrongly, that it wasn't the view that --
22 not everybody holds that view, but that I should not
23 misunderstand that it was not on the basis of my
24 credentials, it was not on the basis of my job
25 performance, it was not on the basis of my inability to

1 get along with other colleagues or any other thing that I
2 had done that prompted Dr. Patterson to take this
3 position. And he was very encouraging with regard to
4 that I had not done anything professionally. I had never
5 caused any sort of -- as a matter of fact, I stayed away
6 from all confrontation when there were active
7 confrontations. I sought to simply do my job and -- so
8 it wasn't done on the basis of performance, evaluations,
9 anything that I'd done...my teaching, my research,
10 anything I've written or any other part -- anything that
11 I had done to cause Dr. Patterson to render this to be --

12 Q. And Dr. Patterson's view is the view that --
13 since the Baptist Faith and Message says that men are to
14 be pastors. Correct?

15 A. Yes.

16 Q. That those who teach men to be pastors in the
17 School of Theology at Southwestern, the faculty should be
18 pastor-qualified themselves?

19 A. That's his understanding.

20 Q. Right. And as expressed yesterday during his
21 deposition many times?

22 A. Correct.

23 Q. And that was the view that was communicated
24 to you by Dr. Wolfe as coming from Dr. Patterson as
25 president of Southwestern?

1 A. That's correct.

2 Q. When -- and this all occurred -- that you
3 knew that that was the view of the administration about
4 those who taught men should themselves be men because the
5 men were going to become pastors of the Southern Baptist
6 Convention?

7 A. No, that was not my understanding of the
8 administration.

9 Q. That was the understanding of Dr. -- Dr.
10 Patterson?

11 A. Yeah, his alone, though.

12 Q. Pardon?

13 A. Only he and probably whatever those two or
14 three trustees or however many there were that objected.

15 Q. Do you have names for these two or three
16 trustees?

17 A. Only those that he mentioned I didn't know.
18 The only one I knew about was R. E. Smith.

19 Q. Okay. And did you -- when you were told in
20 June that Dr. Patterson was not going to recommend you
21 for tenure, what did that mean to you?

22 A. Well, I sought to try and understand what
23 that meant for me. I was told by Dr. Wolfe in addition
24 -- another thing that I remember -- I probably will not
25 remember everything that Dr. Wolfe and I talked about,

1 but he did assure me that I would not walk in one day and
2 find myself without a job, so it didn't mean something
3 like that.

4 Q. Did you know what the tenure track document
5 said in the bylaws or the faculty handbook and manual at
6 that time?

7 A. I did in fact felt that I had met all the --
8 met the criteria and abided by that and didn't feel that
9 my position or what I did or anything had in any way, you
10 know, not fulfilled what I needed to or --

11 Q. Well, you knew that the tenure track had a
12 portion of it where you had to have the recommendation of
13 the president?

14 A. Yes, although he was also clear in stating
15 yesterday that just because you don't have his
16 recommendation doesn't mean that you won't get tenure.

17 Q. Because you knew you had an appeal process
18 beyond what the president recommended?

19 A. I did not. I was not aware of it, plus I did
20 not feel that my job at that point in time was ending, so
21 I did not have anything to appeal. What I did do instead
22 was appeal to Dr. Patterson to -- to rethink it, perhaps
23 to find some other -- if he felt that this was important,
24 I would -- it was very important to me to see if I
25 couldn't have Dr. Patterson's recommendation and I was

1 willing to do whatever would have been necessary in order
2 to get that. I was very, very concerned about the
3 security of my family, concerned about my livelihood,
4 concerned about our hospitalization with a sick husband
5 and child, concerned about a number of matters and so
6 that was my thinking, but I didn't -- at that point I
7 didn't think there was anything that I needed to appeal
8 other than to ask him to give some thought to perhaps we
9 could amend the position or do something that -- in order
10 to please him.

11 Q. But you knew as a part of your faculty manual
12 and handbooks that Dr. Patterson was in the sequence of
13 events necessary to gain tenure at Southwestern?

14 A. Yes.

15 Q. And you knew in June of 2004 that he was not
16 going to recommend you for tenure?

17 A. That's correct.

18 Q. And you in June of 2004 brought up the issue
19 of did you need to look for another job?

20 A. Well, I did ask about that, yes.

21 Q. And you -- was it told to you that it would
22 be good for you to start looking, but that you could keep
23 your job at present for some period of time while you
24 looked?

25 A. It was told to me that I was encouraged that

1 if that's what I chose to do was to look for another --
2 to look for a job, that I could. We, as professors,
3 often test the waters with regard to jobs even though we
4 don't -- may not actually make a switch.

5 Q. How did you -- how did you go about testing
6 the waters initially for what the possibilities were then
7 for leaving the seminary for another job?

8 A. Well, I applied for a few position.

9 Q. When did that begin?

10 A. Probably August, September-ish of 2004.

11 Q. Okay. And do you have records that you kept
12 related to your efforts to secure other jobs beginning in
13 August of 2004?

14 A. I used to have a list of where -- places that
15 I've -- that I sought a job, but I -- that was on an old
16 computer which belonged to Southwestern and a lot of
17 things that were on that computer I don't have anymore.

18 Q. Then just tell me what you remember. About
19 how many places did you start making inquiry to in August
20 of the time period of 2004?

21 A. I made a -- I made only a few. There were
22 problems with the academic cycle in terms of when you
23 begin looking for a job and the application process and
24 the interview process and the hiring process. One of the
25 things that is necessary for finding a position is -- in

1 many cases are presentations at the national meetings and
2 it was too late to schedule any of those. It was already
3 late in the year -- by August to have any hope of too
4 much, but I did apply for a few positions, but I was very
5 unsuccessful and knew that I still had the option of
6 remaining at Southwestern at least through the tenure
7 process.

8 Q. And you had -- were told in June or summer of
9 '04 that you could work there during the fall of '04 and
10 spring of '05. Is that right?

11 A. No, that was never -- there were no
12 limitations placed on how long I could work there.

13 Q. Just --

14 A. Yes.

15 Q. You did know you were going to start looking
16 for a job?

17 A. Well, I didn't know. I just thought I would
18 look into the possibilities and see what was out there.
19 I don't know necessarily that I would have made a switch
20 to a position or anything such as that.

21 Q. But you never had any opportunities actually
22 presented to you?

23 A. No, not for quite a long -- no, I didn't.

24 Q. When is the first time after you began
25 looking in August of '04 that you actually had a

1 likelihood that you could make a switch?

2 A. Probably June of 2006.

3 Q. So does that mean that when you went to
4 Taylor, that was your first opportunity to leave the
5 seminary?

6 A. Yes, but things had changed by then.

7 Q. In that you had been told that you would not
8 be teaching classes the fall of '06?

9 A. Well, actually what I was told -- I was told
10 many different things and then there seemed to be a lot
11 of discussion back and forth and I wasn't told anything
12 determinative for quite awhile. But there -- but I was
13 told first that my contract would end December 31st,
14 2006, which was a surprise to me, that my hospitalization
15 would cease, and that I could keep my title for the
16 spring of 2007, but that I would receive no money or
17 benefits.

18 Q. Then there was further talk?

19 A. There were -- there were further discussions
20 then.

21 Q. Go on, what happened next?

22 A. There was talk about -- at some point in May,
23 I think, it was mentioned to me by Craig Blaising that
24 they may have some responsibilities in the library for me
25 to take care of during that time of that five months, but

1 those were never defined and nothing -- I never knew what
2 those would be or anything like that. Nothing was ever
3 told to me.

4 Q. Okay, then what next?

5 A. It was pretty ambiguous to me. Then -- well,
6 somewhere in here I did have a meeting with -- I did at
7 the very end of March, I think, or spring with Dr.
8 Patterson and Dr. Wolfe, asked him to reconsider and he
9 would not and asked him if there were some way that I
10 could continue to get paid during 2007 and keep my
11 benefits because it was a hardship for me. He said -- he
12 was very noncommittal with regard to that other than he
13 would see me through the spring, but we really didn't
14 know what that meant. And Dr. Wolfe, after we left, said
15 to me, "You realize that he -- by saying that, that that
16 doesn't mean he'll pay you through August or through the
17 summer?" You know, that we were really only buying a few
18 months. And so given that, I was scared and that's why I
19 took the job at Taylor University and it was pretty late
20 in June.

21 Q. Okay.

22 A. Around -- yeah, and I'd put my house up for
23 sale at that point.

24 Q. Did you have the opportunity to keep working
25 at the seminary through December of '06?

1 A. Well, I could have, yes, but then I would
2 have been left kind of in a lurch.

3 Q. Did you have the opportunity to work at the
4 seminary beyond December of '06?

5 A. It sounded as it -- the way it sounded was
6 that, no, I wasn't supposed to do any work there.

7 Q. Did you have the opportunity to work in the
8 library or some writing classes?

9 A. Nobody told me anything about that. I wished
10 they had. I would have stayed because my daughter was in
11 high school -- she was in the middle of high school, we
12 had a home that we had to pay for. We had all kinds of
13 things that -- I had all kinds of financial
14 responsibilities and if somebody would have just said,
15 "Here's -- here's a permanent position to do this", I
16 would have said yes, but nobody ever did. All that was
17 said was that I would have some responsibilities in the
18 library for five months until they terminated my
19 contract.

20 Q. Did you talk to anybody in the library about
21 working in the library?

22 A. No.

23 Q. Did anyone in the library talk to you?

24 A. No.

25 MS. MERICA: Just wait on him.

1 THE WITNESS: Sorry.

2 BY MR. JOHNSON:

3 Q. Let's see. Do I understand correctly that
4 one of the things you wish the court to do is to declare
5 that you have standing and capacity to serve and continue
6 performing the obligations at Southwestern?

7 A. I'm not sure what that -- can you say that in
8 less formal terminology?

9 Q. Are you asking as a part of your lawsuit for
10 the court to say that you had standing and capacity to
11 serve, continue performing your obligations at the
12 seminary?

13 A. I'm not sure what that means. If you gave it
14 to me in some kind of different language, perhaps.

15 Q. Okay. You were elected in -- let's see here.
16 '02?

17 A. Yes.

18 Q. Did you have any kind -- have you -- I think
19 we've made it clear earlier, about you correct me if I'm
20 wrong. You've told me about all your conversations and
21 meetings and paperwork that led up to being a part of the
22 elected faculty at Southwestern?

23 A. Well, I don't know if I've told you
24 everything -- everything I can remember. Like now I do
25 remember we had a faculty workshop, we had new faculty

1 workshops, things like that that I did not mention, so
2 there are things -- other things, but just as I'm trying
3 to remember them, so there probably are other things. I
4 just don't remember everything.

5 Q. How does the faculty workshop or what you
6 just described, does it -- how does it relate to your
7 lawsuit against the seminary?

8 A. It really -- I guess it doesn't.

9 Q. Okay. When is the next time that you met
10 with someone about the terms and conditions of your
11 employment after you were elected to the faculty?
12 Because I have that down just by way of helping the
13 question. You were elected to faculty in April of '02,
14 you started teaching in the fall of '02, and then you
15 told me about your conversations in the summer of June of
16 '04.

17 A. Okay.

18 Q. Were there any meetings between your election
19 and June of '04 that related to your terms or conditions
20 of employment at the seminary?

21 A. The only one I can think of at this point --
22 and there may be others, but I don't recall any except
23 for one and that would have been the meeting with Dr.
24 Patterson in August of 2003.

25 Q. August 2003?

1 A. Yes, that would have been correct.

2 Q. Did you -- did you make any notes, keep any
3 journals, anything of that sort, related to the period of
4 time where you went through the election process to
5 faculty?

6 A. No.

7 Q. Did you make any notes related to what you
8 say is an August of '03 meeting with Dr. Patterson?

9 A. No.

10 Q. Did you make any notes or keep anything that
11 would refresh your memory on any of your meetings with
12 any of the administration or your colleagues as it
13 relates to your -- as it relates to your terms and
14 condition of employment?

15 A. No.

16 Q. Tell me what happened in August of '03 that
17 you've described this meeting with Dr. Patterson.

18 A. Dr. Patterson had just be elected as
19 president of Southwestern Seminary and he had the press
20 conference that we talked about yesterday. When -- he
21 had a meeting with each faculty meeting upon his coming
22 to the school, probably get to know them in whatever -- I
23 don't know really what the goal was, but he was meeting
24 with each one. I went at that time to meet with him. I
25 told him how highly -- well, that I'd heard both good and

1 things -- good things and bad things about him and that I
2 was willing to believe the good unless shown otherwise
3 and -- and heard some really great things about him.

4 And we proceeded -- I asked him if -- I asked
5 him, first of all, if I had to be concerned about my job
6 and he said no. He said that my job is not in jeopardy.
7 He also said that he had no intention of reversing any
8 decision that the trustees had made before he came on to
9 be president. He also said that -- he also -- I also
10 asked him -- he asked me a question with regard to
11 whether or not I would be able to -- if I were told that
12 I could teach women only, would that be a problem for me?
13 I said, "No, that would not be a problem for me if that
14 was the best way that I could serve at the seminary."

15 He asked me -- I asked him with regard to --
16 well, he mentioned to me that -- he asked me what classes
17 I was teaching and I told him and he said that he was
18 fine with those classes, he was fine with me teaching
19 those classes. I was looking for some assurance that my
20 job was not in jeopardy based on his statements that he
21 made on had his election. Then I asked -- I was very
22 eager to try and maintain the parameters and stay within
23 the guidelines as he understood them. I asked him
24 specifically if there was anything that I was not
25 permitted to do at the seminary that would seem to be

1 above or beyond my position, you know, teaching biblical
2 languages, and went through -- you know, I asked him, "Is
3 it all right if I present papers? Is that beyond what a
4 woman should be doing in the School of Theology?" No,
5 that was fine. "Could I write books and do research and
6 journal articles without, you know, a problem?" That was
7 fine. He said that I could even serve in the
8 administrative role on a committee and that he would
9 gladly be on such -- be on such a committee or gladly be
10 under -- on such a committee.

11 I'm trying to think anything else there with
12 regard to that, but he did -- he did -- I went through
13 just about everything trying to see what -- if there was
14 anything that I was doing or any behaviors that -- or
15 things that I might engage in that would in some way go
16 against my job description and he said no. You know, we
17 went through them.

18 And he may have asked me what I thought the
19 problems at the seminary were, but I don't remember that
20 as being part of the conversation. He had no problems
21 with what I was teaching at that point in time and I had
22 nothing to worry about.

23 I immediately went and told Dr. Wolfe and Dr.
24 Klein both how happy I was to hear -- oh, he did -- one
25 other thing he did say. He did say that it was -- that

1 my being a woman, teaching in the School of Theology
2 teaching what I was teaching was not an issue, but it was
3 my responsibility to make sure it never became an issue.
4 And then, as I say, I went forth rejoicing, felt
5 confident that, you know, I was on the right track and
6 went and told -- immediately told Paul Wolfe, told George
7 Klein, both of them what the results of that meeting were
8 and I was just very encouraged by it.

9 Q. Anything else that you remember that you
10 claim happened in that meeting in August of '03 with Dr.
11 Patterson?

12 A. No, that was really it.

13 Q. Was anybody with you?

14 A. No.

15 Q. Did you take any notes?

16 A. No.

17 Q. Do you have any -- any way to recall what
18 happened in that meeting other than your own memory from
19 it?

20 A. No, but it was so significant and important
21 to me that I remembered it very well.

22 Q. When is the next time you talked or met with
23 Dr. Patterson?

24 A. I'm not sure. It was a long time. I don't
25 know exactly what the next date is.

1 Q. What was the event?

2 A. Well, I -- I believe at some point in time in
3 2004 -- or maybe in the fall of 2004 I spoke with him and
4 asked him also to consider -- I think and I don't
5 remember if this is the case. I don't remember exactly
6 what the dates are with regard to that time frame there.
7 That was, you know, less significant to me at the point
8 -- at that point other than I also proposed or said to
9 him that would he also consider possibly me doing
10 something at the college because they were getting ready
11 to have a college and, you know, if that would help my
12 situation.

13 Q. Because that's after --

14 A. Yeah, I wanted --

15 Q. -- the summer of --

16 A. I wanted to please Dr. Patterson and wanted
17 to fit within what he wanted so that he could feel that
18 he could give his approval for me to stay at that job.

19 Q. Okay.

20 A. I enjoyed that job so much.

21 Q. But this fall of '04 time period, that's
22 after the summer of '04 when you learned that he would
23 not recommend you for tenure?

24 A. Yeah.

25 Q. And the issue of looking for another place of

1 employment came up that you described earlier?

2 A. Well, yeah.

3 Q. Okay. Now what -- so after learning that,
4 your -- some period of time you believe in the fall of
5 '04, you were asking for him to reconsider his position
6 on that those that taught men to be pastors ought to be
7 pastor-qualified themselves and looking for an option
8 other than that?

9 A. Other -- yeah, either that or realizing, you
10 know, if he wouldn't grant an exception in my case, then
11 perhaps -- perhaps he would -- you know, would be able to
12 find another place of service for me at the institution.
13 I was very -- I was in a different situation from the
14 typical woman, things were reversed in so many ways as
15 God's hand was in it, so -- but I will say this. I also
16 in several instances attempted to try and, you know, make
17 overtures to Mrs. Patterson, is there anything that I
18 might be able to do to help with the women's program, if
19 there are any of my skills that would be important there.
20 She dismissed me summarily right away and I was sort of
21 surprised that she didn't make any kind of overture to me
22 or try to build any sort of bridge with me with regard to
23 perhaps using my skills and abilities in some way with
24 the women because I would have been open to that and I've
25 expressed openness to that. I did not know her and I

1 would have liked to have gotten acquainted with her and
2 understanding, of course, that she has constraints that
3 are part of being the wife of a president of a seminary
4 and very busy woman. Still as of -- a woman who had been
5 educated at Southwestern Seminary, I thought perhaps I
6 could make a contribution and I couldn't seem to get to
7 square one with her.

8 Q. Have you told me everything that you remember
9 about the fall '04 meeting with Dr. Patterson?

10 A. I guess so. I'm -- I'm sure I can't -- I
11 have a decent memory, but I can't remember everything.

12 Q. When --

13 A. And I don't remember every conversation that
14 I ever had with everybody.

15 Q. Do you remember when you met or talked with
16 Dr. Patterson next? But before I ask -- before that, it
17 was clear he wasn't reconsidering his position about men
18 should be teaching men in the School of Theology?

19 A. Yes, though I was hoping he would reconsider,
20 you know, or find some way to keep me on and be able to
21 recommend me for tenure.

22 Q. Okay. What -- when did you meet or -- and
23 that did not ever occur?

24 A. Well, the next time that I -- that we met
25 over this issue.

1 Q. Okay.

2 A. That I recall.

3 Q. When is that?

4 A. In -- in the spring of 2006.

5 Q. Okay, tell me about that.

6 A. I did already, I think.

7 Q. Remind me quickly then because I thought we
8 were talking about fall of '04.

9 A. Well, as I said, that was the next -- the
10 very next time that I ever had -- we really ever sat down
11 with him that I remember is all the way in 2006.

12 Q. And you've -- you covered that in one of your
13 earlier answers?

14 A. Right.

15 Q. Nothing to add to that?

16 A. No.

17 Q. Did you meet or talk with him any further on
18 the subject of the terms and conditions of your
19 employment other than what you told me about today?

20 A. Not that I could recall.

21 Q. Did you understand and respect where Dr.
22 Patterson was coming from on his interpretation of the
23 bible as it related to the Baptist Faith and Message
24 about that if pastors in the Southern Baptist Convention
25 were to be men, that those who teach those pastors ought

1 to be pastor-qualified themselves?

2 MS. MERICA: Objection, form.

3 THE WITNESS: I understood that that was
4 his personal philosophies and his personal view, but not
5 the view that's held by all people in the Southern
6 Baptist Convention or necessarily -- or the trustees or
7 the administration, et cetera.

8 BY MR. JOHNSON:

9 Q. But you understood the basis on which he made
10 that interpretation from the bible as it related to the
11 Baptist Faith and Message for the Southern Baptist
12 Convention?

13 A. I understood his -- his philosophy or his
14 argument.

15 Q. You mentioned that you -- tell me about your
16 conversations then with Mrs. Patterson.

17 A. Well, one time I -- the first time that I met
18 her she wasn't very talkative, but, you know, I mean we
19 have those days. And other times I went up to her and
20 did say to her that if there's anything I could
21 contribute to the women's program and she said to me, "I
22 don't think so." And that was all she said.

23 There was a point -- to be fair, there was a
24 point in time where I sought to make an appointment with
25 her to just sit down and chat with her, but it was a very

1 difficult time for her personally with parent issues and
2 things and so, you know, she essentially said she was
3 really, really busy, I could work through one of her
4 assistants and try to get a time at some point, but I
5 might not want to bother her because she explained all of
6 her problems that what -- difficulty she was
7 experienceing, I could understand those. So I didn't
8 bother her at that time.

9 And there was a time when -- when I sent her
10 an e-mail asking her about something about doing a second
11 doctorate and that -- and I did that not so much -- well,
12 I was interested in hearing her view. I did it more to
13 try to start a conversation with her or try and reach out
14 to her to try and -- I hear there are some things that we
15 have in common, but I have never been able to find that
16 out.

17 Q. Any other meetings or conversations with her?

18 A. No.

19 Q. You told me that when you met Dr. Patterson
20 for the first time you said to him, "I've heard some bad
21 things about you and some good things." What were the
22 bad things that you had heard?

23 A. That -- well, one of the things -- and this
24 is truly gossip. I mean I don't know the truth or the
25 nontruth.

1 Q. I understand, but you walked in the room and
2 said, "I've heard some bad things about you."

3 A. Well, --

4 Q. What were the bad things you had heard?

5 A. That he collects files on his faculty, you
6 know, and all kinds -- any kind -- anything he can find
7 on his faculty, that kind of thing. That's one thing
8 that I heard.

9 Q. What else?

10 A. That sometimes -- well, I heard and, you
11 know, that -- that he wasn't always to be trusted. You
12 know, that kind of thing.

13 Q. What else?

14 A. This goes back -- that would be the general
15 gist of it, but once again, it's hearsay, gossip or
16 whatever. I don't believe any of those things until
17 somebody actually embraces that behavior because it's
18 gossip and anybody who is important always have people
19 that don't like them.

20 Q. Okay. When did you first talk to Dr. Craig
21 Blaising about anything related to the terms and
22 conditions of your employment at the seminary?

23 A. When he called me to it tell me I had been
24 elected.

25 Q. Okay.

1 A. Which we talked about already.

2 Q. When is the next time you talked to him?

3 A. There may be a time in June of 2004 later in
4 the month when I went to him after I talked to Paul Wolfe
5 and after a couple of weeks. I went in, he expressed
6 that Dr. Patterson wasn't going to -- you know, wasn't
7 going to recommend me for tenure. And I asked him -- you
8 know, I talked to him. We talked a little bit about
9 possibly looking for another job eventually, but that was
10 really all.

11 Q. Nothing else?

12 A. No.

13 Q. Okay. What -- when is the next time you
14 talked to Dr. Blaising about anything related to the
15 terms and conditions of employment?

16 A. I -- well, the conversations that I have
17 mentioned with regard to you're terminated December 31st,
18 then -- well, I know. In 2005 -- October of 2005, let's
19 write that down. On that particular day I was applying
20 for an ATS grant and at that point in time I needed his
21 signature on that application. The grant made the
22 assumption that one would be employed at South -- at the
23 school during the calendar year for which the grant was
24 good, which was the 2006. Let's see, it would be
25 2006/2007 school year. He signed it and so I also felt

1 that I had a job for that school year because he had
2 signed that. And if -- and once I found out in March of
3 2006 that I had been awarded that grant, you know, that
4 -- that became -- I went to him and asked him if I could
5 accept it.

6 Q. What did he say?

7 A. He said yes.

8 Q. Did you accept it?

9 A. Yes.

10 Q. And you used it?

11 A. Yes.

12 Q. Okay. That was in October of '05?

13 A. That's when I talked to him to have him sign
14 the papers for it.

15 Q. And when did you talk to him next after that?

16 A. It would have been in March '06 or April '06
17 and that was those conversations about different dates of
18 when I could stay and what I could do and all these kinds
19 of things.

20 Q. And it's your belief that no one from the
21 library associated with the library talked with you about
22 working at the library some form for the time period of
23 fall of '06 through spring of '07?

24 A. No.

25 Q. When is the next time you talked to Dr.

1 Blaising?

2 A. Well, those conversations would have been in
3 -- I think May. He claims we had a meeting in May. I
4 would assume his calendar is more accurate than mine and
5 that he -- that this position -- but I don't -- that was
6 never -- no position was ever offered to me as an
7 assistant director of anything or anything.

8 Q. Have you covered all of your conversations
9 about meetings with Dr. Blaising?

10 A. All those that I can remember.

11 Q. Okay. When is the first time that you talked
12 with -- tell me the relationship between Dr. Wolfe and
13 Dr. Klein in terms of what positions they held.

14 A. Dr. Klein is the associate dean for Ph.D.
15 studies now and so he's no longer -- actually he would
16 have no longer been a superior, he would have been a
17 colleague, and he was my mentor and so forth...supervised
18 my dissertation and that kind of thing. I graded for him
19 and that was it. Paul Wolfe then would actually be his
20 boss.

21 Q. Okay.

22 A. Paul Wolfe is the assistant dean for Biblical
23 -- for the Biblical Studies Division.

24 Q. When did you first talk to -- you've
25 mentioned Dr. Klein today several times. When was the

1 first time you talked to him about your terms and
2 conditions of employment, if you -- if you did?

3 A. Other than -- other than the initial
4 conversations with regard to possibility -- the
5 plausibility of election and such as that and would he
6 advise me not to speak to the press and that this could
7 -- you know, that this was just one of these things that
8 it would be wise to avoid. We may have had some
9 impromptu conversations over the period of my employment
10 with regard to progress on these things, but I couldn't
11 date them nor tell you what the substance of any of those
12 necessarily were.

13 Q. Okay.

14 A. We were colleagues, we were friends.

15 Q. So no -- no remarkable --

16 A. No, I don't have any like notes or, you know,
17 anything that just really would be important to remember.

18 Q. That stand out related to your claims and
19 terms and conditions of employment with the seminary,
20 nothing on that?

21 A. Other than -- other than when I had the
22 conversation with Dr. Blaising -- or Dr. Patterson with
23 regard -- the very first initial conversation, how
24 encouraged I was, I told him about that because there was
25 -- you know, he was just concerned. And probably -- I

1 mean not the terms and conditions of my employment, but
2 anyway.

3 Q. Anything --

4 A. Just normal conversations that we would have
5 as -- anybody would have as colleagues.

6 Q. Anything else related to Dr. Klein's -- your
7 meetings or conversations with him that relate to your
8 claims in this lawsuit?

9 A. No.

10 Q. Okay. What about Paul Wolfe...Dr. Wolfe?

11 A. Dr. Wolfe was, of course, my immediate
12 supervisor and so he got the responsibility of sharing
13 various pieces of news with me as they occurred.

14 Q. Okay. And the first piece being the June of
15 2000 --

16 A. '7.

17 Q. '4?

18 A. Or '4, yes.

19 Q. When was the next time you met with Dr. Wolfe
20 related to terms and conditions of your employment after
21 June of 2004?

22 A. Well, I know that, according to the records
23 -- like once again, I didn't keep records really. I -- I
24 submitted a letter to Dr. Patterson trying to ask him to,
25 you know, appeal. I'd be willing to teach women's

1 courses or whatever I needed to do to keep my position.

2 Q. When was that?

3 A. I may have met with Paul at that point to ask
4 him about whether this was a feasible option.

5 Q. When was that?

6 A. Well, according to what he says, it was
7 sometime in August, but --

8 Q. Of '04?

9 A. Yes.

10 Q. When is the next time you talked with Dr.
11 Wolfe about anything -- your claims or related terms and
12 conditions of your employment at the seminary?

13 A. I'm -- other than to know that -- I mean I
14 always -- we had to have scheduled talks each semester,
15 you know, as part of his job, what we -- what I was going
16 to be scheduled to teach and when I was going to teach
17 it, those kinds of things. There were always faculty
18 evaluations, you know, so the typical things that would
19 be part of normal employment. There were faculty
20 evaluations, we would discuss those. Probably February
21 of 2006 would have been anything significant.

22 Q. What happened then?

23 A. It would -- the -- wasn't able to produce a
24 schedule for me and so I -- there was something -- things
25 were up in the air and I didn't know what that was

1 meaning at that point, but everybody else had a schedule
2 and I hadn't been scheduled for anything.

3 Q. And what was the schedule to cover...what
4 time period?

5 A. '06 to '07.

6 Q. When did you --

7 A. I think -- well, first he came in and said I
8 couldn't teach a doctrinal seminar, then there was
9 another one. There were several small conversations. I
10 was going to be teaching a doctrinal seminar and then I
11 couldn't do that and -- but nothing was told to me other
12 than it was like all in secrecy.

13 Q. Had you since -- since the summer of '04 --
14 when we talk about schedules, they would typically be on
15 a fall and spring basis. Right?

16 A. Usually, although really schedules were done
17 in the spring -- if I remember correctly and I'm -- I may
18 not. Usually they're made out a year in advance.

19 Q. I understand that, but they're for a
20 nine-month period, not a twelve-month period?

21 A. Not necessarily.

22 Q. Okay.

23 A. For instance, I taught -- the year '05 to
24 '06, I taught six hours in the summer and -- I mean
25 taught thirty-something hours just in that one time

1 period alone, way above what my contract hours were.

2 Q. That was for the school year '05 to '06?

3 A. Uh-huh.

4 Q. Okay. And then how many -- how many hours
5 did you say you taught that year?

6 A. Thirty-something. Thirty-three or something
7 like that.

8 Q. For a twelve-month period?

9 A. Yes.

10 Q. Okay. And for a twelve-month period, '0 --
11 that was '04 to '05?

12 A. No, that was '05 to '06.

13 Q. Okay. And when is the beginning of that
14 period? Fall '05?

15 A. Well, school is from fall '04 to spring '05.
16 The summer of '05 I taught all summer. So I guess maybe
17 that's '04/05.

18 Q. Okay.

19 A. And then fall starts '05.

20 Q. Let's go --

21 A. To spring '06.

22 Q. Let's go through it this way. I will be more
23 specific. What did -- how many hours did you teach the
24 summer of '04?

25 A. I think I taught three, but I don't remember.

1 I may have taught a May term.

2 Q. Okay.

3 A. I have -- it's on the faculty evaluations
4 that you all have.

5 Q. Okay. Did -- did you teach from -- from the
6 spring of '02 until you left in the summer of '06.
7 Correct?

8 A. Yes.

9 Q. Did your teaching load number of hours stay
10 constant?

11 A. They were always -- I always taught secondary
12 hours or hours over and above my normal contract hours.

13 Q. When is the first time you had fewer hours to
14 be taught during a semester?

15 A. Never.

16 Q. Okay. And did you --

17 A. Unless it is a summer. Like I say, I might
18 have taught a May term instead of a summer term or a J
19 term. You know, there are various terms, but it was
20 always an overage of hours.

21 Q. Did you -- did you -- were you scheduled to
22 teach for the summer of '06?

23 A. No.

24 Q. Were you scheduled to teach for the fall of
25 '06?

1 A. Not yet. That -- those conversations,
2 that's, you know, when I was -- hadn't received a
3 schedule by then.

4 Q. And how many hours did you teach in the
5 spring of -- in the spring of '06?

6 A. My guess -- I'd have to guess.

7 Q. Just whatever it shows?

8 A. Yeah, whatever it shows. It may have been
9 twelve.

10 Q. All right. Well, we were talking about Dr.
11 Wolfe and you were saying that you had the regular course
12 of conversations about evaluations and --

13 A. Right.

14 Q. -- course assignments and so forth?

15 A. Right.

16 Q. When is the next time that you talked to him
17 about your claims or the subject of any of your claims or
18 the subject of any of your terms and conditions of
19 employment?

20 A. Well, we had probably -- well, we had the two
21 conversations in February-ish, I guess. We probably had
22 a conversation in March or -- well, in March near the end
23 when we went to see Dr. Patterson, he was involved in
24 that conversation. I don't recall anything else
25 specifically.

1 Q. But he was the one that met with you in June
2 of '06 -- '04?

3 A. Yes, he was the initial person.

4 Q. Anybody else in that meeting?

5 A. No.

6 Q. And the information that he was delivering,
7 you believe, came from Dr. Patterson in that meeting?

8 A. Yes.

9 Q. What about Dr. Allen? Did you ever meet or
10 talk with Dr. Allen about anything related to your claims
11 or any of the terms and conditions of your employment?

12 A. I remember a conversation, but I cannot date
13 it.

14 Q. Okay.

15 A. When I sat down with him and I was talking to
16 him about Dr. Patterson's perspective, his view of this
17 -- this issue and he expressed to me or he had said to me
18 that when I was -- that not everybody believes the same
19 way that Dr. Patterson does. He also said that he spoke
20 on my behalf at my election. And since I was not there
21 to witness any of this, I don't know what actually
22 happened and so I only know what I'm told. He said that
23 he spoke on my behalf at my election when he was chairman
24 of the board of trustees, but that if I ever told
25 anybody, he'd deny it.

1 Q. Okay. Any other talks?

2 A. Essentially that was the essence of the
3 conversation.

4 Q. Anything else?

5 A. Well, --

6 Q. Meetings or talks with Dr. Allen?

7 A. I'm thinking -- I'm thinking that meeting may
8 have also been in like the grant -- receiving the grant
9 and I may have said something to him about that.

10 Q. After summer -- after June of 2004, when you
11 learned that you were not going to be recommended for
12 faculty tenure, did you find your colleagues to be
13 encouraging and helpful whenever you wanted to make a job
14 application or an application to do a paper or a -- speak
15 somewhere?

16 A. Yes, though I didn't actually speak anywhere.
17 I don't -- I don't normally do too much public speaking
18 other than just my job.

19 Q. How -- how were your colleagues helpful in
20 your job search and/or grant applications and/or --

21 A. They wrote recommendations for research that
22 I suggested for the grant. If -- during -- let's see,
23 I'm trying to think here. During -- I'm not sure, but
24 perhaps during '04 to '05 I might have still been working
25 with Jewish Theological Seminary, so, you know, they were

1 encouraging in that way. Recommendations or letters if I
2 needed -- if I wanted them.

3 Q. But were they always helpful in helping you
4 make a transition after you learned in the summer of '04
5 if you needed them to help you apply for something or a
6 letter of recommendation, were your colleagues and those
7 at the seminary always helpful to you in that regard?

8 A. Yeah, no matter what -- whatever project
9 there was, whatever I needed to do.

10 Q. Okay. I've been told that this is a good
11 time to break because of the tape, so we'll take a
12 morning break.

13 THE WITNESS: Thank you.

14 THE VIDEOGRAPHER: We're off the video
15 record. The time is 10:31.

16 (Break in the deposition.)

17 THE VIDEOGRAPHER: We're on the video
18 record, the time is 10:48.

19 BY MR. JOHNSON:

20 Q. All right, we're after a morning break and
21 ready to continue, Dr. Klouda.

22 When you mentioned you were talking to Dr.
23 Allen, that was during the time frame that he had been on
24 the board?

25 A. The time that I talked -- well, the times

1 that I talked to Dr. Allen formally was after he had
2 already done his term at the board and he was then the
3 dean of the School of Theology.

4 Q. Okay. And did you have any other
5 conversations with Dr. Allen other than what you've told
6 me about this morning?

7 A. He -- he did ask me through e-mail in, I
8 think, January of 2007 whether I had spoken to Wade
9 Burleson. That's -- if that counts as a conversation and
10 I'm trying to think. I may have had conversations with
11 him, but I don't remember the substance of them.

12 Q. So you've told me about all of your
13 conversations with Dr. Allen about the claims in your
14 lawsuit or terms and conditions of your employment?

15 A. All that I remember, yeah.

16 Q. All right. Have you talked to Wade Burleson?

17 A. Yes.

18 Q. How many times?

19 A. Probably half a dozen.

20 Q. Tell me about those. When did they begin?

21 A. He called me, I think, in January of 2007 and
22 asked me about the truth with regard to what he had heard
23 about my leaving Southwestern and I told him some of the
24 story, not knowing that he was going to post it on his
25 blog. When he told me that he was in fact going to do

1 that, I objected.

2 Q. And did he publish any of the stories that
3 you told him that you objected to?

4 A. He did. That was the first one or that was
5 the one -- that was the one that he -- that told -- he
6 posted it -- he put it on his blog and I'd objected to it
7 and I even told Dr. Patterson about it.

8 Q. That was in January of '07?

9 A. I believe it was January of '07.

10 Q. Okay. Did you object before it went on the
11 blog or after?

12 A. Oh, before.

13 Q. Okay.

14 A. When he told me of his intentions of putting
15 it on the blog, that bothered me and -- and when I --
16 when I told him he didn't have my permission, then he
17 started calling some folks because he thought that maybe
18 somebody was trying to hush me up and -- you know, I mean
19 it turned into a very big thing and I never -- before
20 that I had really never said anything publicly to anybody
21 about anything that happened to me at Southwestern with
22 regard to my position.

23 Q. So knowing that's the way he acted, what --
24 did you refuse to talk to him again?

25 A. I hadn't talked to him for -- I didn't talk

1 to him for awhile, I don't think, after that.

2 Q. When did you decide to do it again?

3 A. Well, I don't -- I don't remember dates, I
4 don't remember times, never recorded them or -- I have no
5 idea what the dates would be. I've had some
6 conversations with him. They're usually somewhat brief.

7 Q. What have you talked to Wade Burleson about
8 then?

9 A. He has talked to us about our family needs on
10 a couple of occasions, especially with our struggles
11 because of having to take a position that was not the
12 equivalent of what I had enjoyed at Southwestern and my
13 husband's physical problems. And we were -- we were in
14 -- we've had some financial dilemma as a result of having
15 to relocate and so forth and so we had conversations
16 about our family needs and prayer things such as that.
17 That's about it. We didn't -- we don't like converse on
18 a regular basis or anything.

19 Q. When's the last time you talked to him?

20 A. Several months ago.

21 Q. About what?

22 A. I mentioned to him that my husband had had a
23 heart attack and he was diagnosed right before this
24 Christmas, so he had a heart attack the day before
25 Thanksgiving this year and he was -- went -- we didn't

1 know at first and then he -- his doctor sent him to the
2 hospital and we discovered that he had had a heart attack
3 and he has some now new limitations on what he can do and
4 can't do and we're working through the issue with the
5 cardiologist. He was in the hospital for a couple of
6 days and it -- you know, and so financially that
7 presented a problem for us and so forth. So that's --
8 and I didn't just go through all of that, but we did talk
9 about that.

10 Q. Did you ever talk to him about legal
11 representation?

12 A. Not that I recall.

13 Q. You mentioned -- has Wade Burleson done
14 anything else on your behalf other than what you've told
15 me?

16 A. Well, other than -- as I say, I had very few
17 conversations with him other than that first one and
18 then, you know -- but I know that he and dozens and
19 dozens of Christians and Baptists have reached out and
20 helped us financially through that time period...that
21 initial first six or eight months when we first had to
22 move and then recently.

23 Q. How did -- what do you mean, how did they
24 help you?

25 A. Financially that they helped.

1 Q. Money?

2 A. Yes.

3 Q. How much money?

4 A. I can't say exactly. I would get notes and
5 cards from folks on, you know, an unexpected basis. You
6 never knew when this was going to happen, so I couldn't
7 say exactly.

8 Q. About how much money?

9 A. Probably about \$10,000.00, maybe, altogether,
10 maybe a little more. I can't recall exactly and that
11 wouldn't count like individual gifts and things that have
12 occurred and so forth. I mean I don't know exactly.

13 Q. So he's raised money through his church to
14 give to you?

15 A. Yes, his church and other folks.

16 Q. And do you understand that those folks knew
17 they were giving money to you?

18 A. Yes.

19 Q. Do you know whether they took a deduction
20 from his church for those gifts to the church?

21 A. I don't know.

22 Q. Did you -- how did you treat the receipt of
23 the money just from a tax standpoint?

24 A. I'm paying tax on it. I haven't had to file
25 it yet, so --

1 Q. What -- when -- when did you first receive
2 money?

3 A. Last year.

4 Q. In -- when last year?

5 A. Maybe March.

6 Q. And when did you last receive money?

7 A. I would say the first week of February of
8 this year.

9 Q. Did you --

10 A. There was an interval inbetween. I wasn't
11 like getting money on a regular basis, but --

12 Q. Any other conversations, meetings, assistance
13 that you have had with Wade Burleson other than what
14 you've told me?

15 A. No.

16 Q. Okay. Conversations, meetings or assistance
17 with Ben Cole?

18 A. No.

19 Q. None?

20 A. No.

21 Q. Okay. Conversations with any other trustees
22 from the seminary, past or present, that you haven't
23 included in talking about other people?

24 A. Dwight McKissic was aware.

25 Q. Okay. When did you first talk to or meet

1 with or communicate with Dwight McKissic?

2 A. He came to see me in January when I was here
3 in Dallas/Fort Worth for an editorial board meeting.

4 Q. January of which year?

5 A. The end of January, last year.

6 Q. '06?

7 A. Yeah.

8 Q. I mean '07?

9 A. Whatever that -- '07, last -- last year, '07.

10 Q. Okay. And what -- you were here for what?

11 A. Editorial -- I'm on an editorial board for a
12 commentary series for --

13 Q. And did -- who set up that meeting with Dr.
14 McKissic?

15 A. He did.

16 Q. And what took place at that meeting?

17 A. He came and talked to me and gave me his
18 encouragement, support. He came with his wife, they both
19 were there, and gave -- he wasn't in agreement with what
20 had happened and -- so that's essentially --

21 Q. Let's see. Was -- was he on the board of
22 trustees?

23 A. Uh-huh.

24 Q. At the time?

25 A. I don't know if he was at the time. I know

1 he was at -- on the board of trustees as of the -- at
2 that time when I met them.

3 Q. When did you -- I know when you filed the
4 lawsuit, but when did you consult legal counsel?

5 A. Maybe in February. Early February, maybe end
6 of January. Well, I'm not exactly sure. Somewheres the
7 end of January, beginning of February.

8 Q. Did Dr. McKissic tell you about any ongoing
9 business or deliberations of the board of trustees?

10 A. Absolutely not.

11 Q. Did you ask him any?

12 A. No.

13 Q. Is there any coincidence between the fact you
14 met him in January of '07 and soon thereafter you filed a
15 lawsuit against the seminary?

16 A. No, no connection.

17 Q. Any other meetings or conversations with
18 Dwight McKissic?

19 A. No.

20 Q. Any other meetings or conversations with
21 trustees of the seminary past or present?

22 A. Well, I did have a conversation with -- once
23 again, I don't -- the trustees change. I don't know
24 their faces. I'd know their faces, but I don't know
25 their names and so I can identify them by face, but not

1 by name.

2 Q. Okay.

3 A. But there have been a couple who have come by
4 my office when I was at Southwestern.

5 Q. And --

6 A. Not together, at different times.

7 Q. Right.

8 A. One recently passed away, say within that
9 year in 2006.

10 Q. And when we identify that person or if we do,
11 what was the meeting or conversation about?

12 A. Well, he stopped by my office and told me
13 what a great job I'd been doing and how sorry he was, you
14 know, that -- that -- that things weren't -- you know,
15 that there were some who did appreciate me there. And I
16 had others come by and tell me -- tell me that they were
17 supportive of me and what a great job, that type of
18 thing. I mean nothing -- no intense conversations.

19 Q. Okay. Nothing to do with the lawsuit or --

20 A. No, absolutely not.

21 Q. -- the terms or conditions of the claim?

22 Any other meetings or conversations with
23 trustees?

24 A. No, just the usual "that a girl" stuff.

25 Q. Any other meetings with anyone related to the

1 claims that you're making in this lawsuit or the terms
2 and conditions of your employment that are related to the
3 seminary in some way, whether they be professors,
4 administration staff, officers or anything like that?

5 A. Not that I remember.

6 Q. And I take it from your earlier conversations
7 you don't have any paperwork related to -- journals or
8 calendars or notes related to any of the meetings we've
9 talked about --

10 A. No.

11 Q. -- today? Do you have --

12 A. I didn't feel like I had to prepare any.

13 Q. Do you --

14 A. Or I would have.

15 Q. Do you have any tapes or recordings of
16 anything --

17 A. No.

18 Q. -- related to this lawsuit?

19 A. I wish I had.

20 Q. You say that -- there's two parts of the
21 lawsuit that you have brought. You said that Dr.
22 Patterson labeled plaintiff a mistake and stated
23 expressly and impliedly that Dr. Klouda was unfit to
24 teach at Southwestern and unfit to teach men. When was
25 that said?

1 A. Dr. Patterson did not say that. Dr. Wolfe
2 said that I was -- I was a mistake that the trustees
3 needed to fix.

4 Q. So is --

5 A. He was saying that in terms of the whole
6 issue and I don't remember which date he said that.

7 Q. What do you mean in terms of the whole issue?

8 A. In terms of my election to the faculty and
9 then this apparent new consensus later on that I wasn't
10 going to be continued in my employment.

11 Q. That's what he called the mistake?

12 A. Yes, that's what he said. And so Dr.
13 Patterson did not say that, but the other things --

14 Q. Just a minute here. You're saying today
15 under oath that Dr. Patterson did not label you a
16 mistake?

17 A. No, Dr. Patterson did not and in some of the
18 other filings it doesn't say he specifically said it, so
19 -- because he did not specifically say that.

20 Q. But when the word mistake was used, you're
21 telling me today that that was said by Dr. Wolfe?

22 A. Wolfe.

23 Q. And that it had to do with the entire --

24 A. The decision not to continue my employment.

25 Q. The decision by the faculty -- by the

1 administration or by Dr. Patterson not to recommend you
2 for tenure, that that is the mistake Dr. Wolfe was
3 speaking of?

4 A. Well, he was speaking of that -- well, he
5 spoke on behalf of Dr. Patterson, so -- but Dr. Patterson
6 didn't actually utter those words.

7 Q. But the topic has to do --

8 A. I was perceived by Dr. Patterson as a mistake
9 that the trustees needed to fix and so -- but Paul Wolfe
10 was the one that said that, not Dr. Wolfe.

11 Q. When did he say that?

12 A. Sometime in the spring of 2006, one of our
13 various meetings.

14 Q. Did --

15 A. We had several -- they were short meetings,
16 you know, different.

17 Q. And you said initially that the mistake had
18 to do with a -- with a reference to the entirety of it
19 all?

20 A. Well, to my -- apparently that Dr. Patterson
21 perceived me as a mistake that the trustees needed to
22 fix, so that would be with regard to the fact that I was
23 a woman teaching in a role that he, from his personal
24 perspective, thought I was not qualified to teach in.

25 Q. Okay. And that personal perspective goes

1 back to his understanding of the scripture?

2 A. Well, to his view, his philosophical approach
3 to that scripture.

4 Q. His interpretation of that scripture?

5 A. His understanding.

6 Q. Okay. When -- who was present when that was
7 said..when Dr. Wolfe talked to you?

8 A. Nobody.

9 Q. Who was present?

10 A. Dr. Wolfe and.

11 Q. That's it?

12 A. Yeah.

13 Q. Who did you tell next about it?

14 A. My attorney because I remembered it because
15 it was one of those things that really stood out in my
16 brain.

17 Q. And who else have you told about it?

18 A. Nobody, I don't think.

19 Q. Have you heard it be repeated by anyone else
20 on earth other than when you repeated it to your
21 attorney?

22 A. I may have -- I may have said something to a
23 media person, so I think it's been brought out in the
24 media.

25 Q. As a result of you talking to a media person?

1 A. That's correct.

2 Q. Not as a result of Dr. Wolfe?

3 A. No.

4 Q. Not as a result of Dr. Patterson or anyone
5 with the seminary?

6 A. No.

7 Q. How many times have you seen it repeated in
8 the media as a result of your talking to them?

9 A. I think it was -- it was probably recorded
10 once and then multiplied by media people who pick up on
11 the same story and repeat the same things over and over
12 again, so I'm sure it's been repeated in the media.

13 Q. Have you ever told anyone since it's been
14 repeated multiplied times that you did not hear that from
15 Dr. Patterson?

16 A. Well, I don't think the media attributes it
17 to Dr. Patterson, though I may be wrong. And if they
18 did, then they're incorrect, but the media has a tendency
19 to get some things incorrect anyway, which I've noticed
20 even when you try and make it clear, they still sometimes
21 get things incorrectly.

22 Q. After knowing there was a falsehood out there
23 about this comment, did you issue any corrections or try
24 to retract it?

25 A. Well, as I say, I don't think that the media

1 actually reflected that -- reflected that as being
2 Patterson's words.

3 Q. Okay. Who did they reflect it as being?

4 A. They didn't say that. They just said I was
5 referred to as, but they didn't say who said it because I
6 would have said that Paul Wolfe said it. And I have
7 since made sure to let folks or my counsel know that that
8 was something that Paul Wolfe said, not that Dr.
9 Patterson actually uttered from his lips.

10 Q. Okay. And I understand that when probably
11 Paul -- was anybody with you when Paul --

12 A. No.

13 Q. -- Wolfe when he told you that?

14 A. No.

15 Q. And his intention in telling you those words
16 was probably related to the overall disagreements and
17 change of position at the seminary with Dr. Patterson
18 coming in after Dr. Hemphill and trustees changing?

19 A. I can't know that. I don't know anything
20 about what the trustees thought or what they did or
21 whether they changed.

22 Q. But you don't ascribe any ill-will to Paul
23 Wolfe having --

24 A. Certainly not.

25 Q. -- told you that?

1 A. No, he was trying to express --

2 Q. Go ahead. Trying to express what?

3 A. He was trying to express himself in words or
4 express --

5 Q. You've known Paul Wolfe to be a man of truth
6 throughout all this. Right?

7 A. Yes.

8 Q. Did -- was there ever anything in the -- that
9 came out that you ascribe to Dr. McClain having said,
10 anything about the seminary changing its position in
11 hiring a woman to teach in the School of Theology?

12 A. No, I don't know Mr. McClain. I've never met
13 him. I don't even -- I never knew of him until he said
14 whatever he said to the Dallas Morning News or whoever it
15 was, so I don't know anything. I've never talked to him,
16 I've never seen him. I couldn't recognize him.

17 Q. And when -- when did he say that to the
18 Dallas Morning News?

19 A. I don't know.

20 THE COURT REPORTER: Ma'am, you need to
21 wait.

22 BY MR. JOHNSON:

23 Q. We're talking over each other and I'll just
24 be sure that I don't interrupt you and you don't
25 interrupt me. That's all the court reporter is talking

1 about.

2 In -- in Dr. McClain's, you said -- he said
3 something to the Dallas Morning News. What do you
4 understand that he said to them?

5 A. That it was a momentary lax of parameters or
6 that the trustees elected me to the board was a momentary
7 lax in the parameters.

8 Q. Anything else?

9 A. No, I don't --

10 Q. You ascribe ill-will to that definition of
11 what happened at the board of trustee level?

12 A. I can't know his motivations or thoughts.

13 Q. But do you know of any?

14 A. I can't know.

15 Q. Did --

16 A. I don't know the man.

17 Q. Do you see that as anything other than his
18 explanation of what happened at the beginning when you
19 were hired onto the tenured faculty?

20 A. I look at it as being negative, yes.

21 Q. How -- has anybody else brought those words
22 up to you as having a consequence to you in any form or
23 fashion?

24 A. Not that I can recall.

25 Q. When did you first learn about them?

1 A. In the media.

2 Q. After you had gone to work at your new place
3 of employment?

4 A. Yes.

5 Q. Has anyone at your new place of employment
6 brought those words up to you?

7 A. No.

8 Q. Has it affected your terms and conditions of
9 employment at Taylor at all?

10 A. No.

11 Q. Have you signed any affidavits or given any
12 sworn statements related to any -- any part of this
13 lawsuit or media or meetings with anyone?

14 A. No, sir.

15 Q. Other than the money you told me about from
16 Wade Burleson -- well, specifically, was that money from
17 him personally or was it through his church? How did you
18 receive it?

19 A. That money was -- I don't know of anything he
20 gave personally, though.

21 Q. How did --

22 A. So I don't know that.

23 Q. How did --

24 A. It came -- it came through his church. It
25 wasn't from his church members necessarily, but it was

1 collected at his church and sent to me.

2 Q. Did it come in a -- in a check from a church?

3 A. Yes.

4 Q. What's the name of that church, please?

5 A. Emmanuel Baptist Church.

6 Q. When did it first -- when did you first have
7 the thought that you might not be able to keep your job
8 as -- on -- as a professor in the School of Theology that
9 trained men to become pastors?

10 A. Probably somewhere in late spring of 2006,
11 between the conversations in March and May and April with
12 the part principles.

13 Q. Did you have that thought upon -- that
14 thought before Dr. Patterson came to become president?

15 A. No.

16 Q. Did you have that -- any thought that you
17 might not be able to keep your job or not be recommended
18 for tenure when it was announced he was president?

19 A. No.

20 Q. Did you have any thought that you might not
21 be recommended for tenure during the summer of '04?

22 A. No.

23 Q. Okay. Have you talked to any accrediting
24 agencies that give crediting to the seminary?

25 A. No, or -- let me think. No, I did not.

1 Q. Have you talked -- have you or anyone on your
2 behalf talked to SACS, Southern Association of Colleges
3 and Schools?

4 A. Not by my initiation or authority.

5 Q. But has somebody done that?

6 A. As far as I know or what I heard and it's
7 hearsay.

8 Q. What have you heard?

9 A. Ben Cole did that.

10 Q. Ben Cole did what?

11 A. Did something, filed a complaint with SACS.

12 Q. Have you seen what he filed?

13 A. No.

14 Q. Heard what he filed?

15 A. I heard about it.

16 Q. Do you believe it to be true or false?

17 A. I don't know.

18 Q. What did he file, from your understanding?

19 A. I don't know.

20 MS. MERICA: Wait.

21 BY MR. JOHNSON:

22 Q. Anybody else on your behalf or that you know
23 of talked to the Southern Association of Colleges and
24 Schools related to the seminary, you're not being
25 recommended for tenure there?

1 A. Not that I know of.

2 Q. Okay. The same question for ATS, the
3 Association of Theological Schools?

4 A. Not that I know of.

5 Q. Do you know if Ben Cole did anything with
6 ATS?

7 A. I do not know of anything.

8 Q. Do you still go to a Southern Baptist church?

9 A. I do not.

10 Q. When did you -- have you removed your letter
11 from the Southern Baptists?

12 A. No.

13 Q. I have not.

14 Q. Where does your letter currently reside?

15 A. First Baptist Dallas.

16 Q. Are you a member there?

17 A. Yes.

18 Q. Do you participate in any form or fashion at
19 First Baptist Dallas?

20 A. Right now, no.

21 Q. When did you stop participating in any form
22 or fashion at First Baptist Dallas?

23 A. When I moved to -- to Indiana.

24 Q. Okay. Have you joined another church since
25 moving in the summer of '06?

1 A. No. We attend a church regularly, but we
2 haven't joined a specific church.

3 Q. And what is that church's name?

4 A. Upland Community Church.

5 Q. Is it associated in any form or fashion with
6 the Southern Baptist Convention?

7 A. No, it is not.

8 Q. Have you participated -- when -- when did you
9 last participate by going to a Southern Baptist
10 Convention?

11 A. I never went.

12 Q. Ever?

13 A. Ever.

14 Q. Did you -- were you ever a part of any --
15 other than being employed at the seminary, were you ever
16 a part of any agencies of the Southern Baptist
17 Convention?

18 A. I was not, I don't believe.

19 Q. Did you ever participate in any Southern
20 Baptist Convention activities, committees, gatherings,
21 any form or fashion of -- while you were at the Southern
22 -- Southwestern Baptist Seminary as a student through the
23 day you left the summer of '06?

24 A. I did not.

25 Q. Why?

1 A. Well, the -- first of all, the institution
2 will only pay if you go every other year as a faculty
3 member, so it's expensive. And as a student, obviously I
4 couldn't afford to go and pay my way. Second, I don't
5 like being away from home -- from my family and my
6 daughter and my husband and their needs come first and so
7 that was an opportunity that is unnecessary for me to
8 participate in when I need to be at home with them.

9 Q. Any other reasons?

10 A. No.

11 Q. Did you ever talk with anybody about that you
12 might have risk of your position teaching in the School
13 of Theology to men even before Dr. Patterson came to the
14 campus as president?

15 A. Would you rephrase that?

16 Q. Yeah, did you ever talk with anyone about the
17 risk of losing your job of teaching in the School of
18 Theology at the seminary even before Dr. Patterson came
19 as president?

20 A. No.

21 Q. Did anyone ever tell you that you were at
22 risk of losing your job when Dr. Patterson was elected as
23 president?

24 A. No.

25 Q. What -- what's the hesitation for?

1 A. Just trying to be thoughtful.

2 Q. What's the -- what's the purpose of -- of one
3 wanting to become a pastor of a Southern Baptist church
4 to take a course in exegesis method?

5 A. Rephrase that again.

6 Q. Yeah. What's -- what good does it do someone
7 that's going to become a pastor of a Southern Baptist
8 church, students in the School of Theology at the
9 seminary, what good -- good for them to take a course in
10 exegesis method?

11 A. Well, in such a course they are -- they
12 discuss issues of grammar and syntax, how words fit
13 together in order -- in a Hebrew sentence. They are made
14 -- we familiarize them with the various resources that
15 are available to them to use in their preparation of and
16 their interpretation of scripture, but we just -- we
17 familiarize them with the sources and how they're used
18 and how -- and also they learn that nuances of words can
19 affect particular context. They learn to use -- make
20 sure that they look at a passage historically and
21 grammatically and from its literal context and things
22 such as that.

23 Q. And what are they likely to do with that
24 knowledge?

25 A. Well, seeing as how I taught mixed classes,

1 whatever it was -- I mean each one -- each student had
2 different goals.

3 Q. If you were a male student studying to become
4 a pastor in a Southern Baptist Convention church, what
5 were they likely to be able to do with that knowledge?

6 A. Well, they needed to -- then they would be
7 able to take sermon prep or sermon preaching and so forth
8 and be able to implement whatever it is that they needed
9 with those tools to prepare their sermons.

10 Q. How was it related to sermon presentation?

11 A. In terms of looking at a -- learning how to
12 translate the passage, learning how to distinguish
13 between various stems and roots of words, how those words
14 work together in clauses. We're talking about
15 grammatical issues. And from the perspective of
16 communication so that when they did their work, which
17 it's interesting, but the course was highly student-run
18 and integrated. They did all exegeses on this own, they
19 did all of the work. They did the reading and the
20 various things in those courses and -- so they were --
21 they were finding out what the resources were, how they
22 were useful, that they could then use in working through
23 their biblical text.

24 Q. In preparation for sermons?

25 A. That's correct.

1 Q. I mean you don't have any --

2 A. But that's not the only thing that those
3 students were. There were lots of other students that
4 weren't in that arena.

5 Q. I know, but you have -- you have no doubt
6 that these basic building blocks of the method of
7 understanding grammar of the Hebrew text was the building
8 block then for sermon preparation?

9 A. Well, --

10 Q. For the men that were going to teach and
11 preach in Southern Baptist churches?

12 A. I think -- I think that it contributes to
13 that.

14 Q. All right. And you -- you understood that
15 basic building block that you were giving them toward
16 becoming preachers and pastors and ministers in local
17 churches, did you not?

18 A. Yes.

19 Q. Did you know of anybody at the seminary --
20 I'm talking about your -- any other professors there that
21 were on tenure tracks, let's limit it to that. Did you
22 know any of them that had been given assurance of tenure?

23 A. No, but I -- no.

24 Q. Do you believe you were given assurance of
25 tenure?

1 A. No.

2 Q. Do you know if any people that were on tenure
3 tracks that were given multiyear contracts at the
4 seminary?

5 A. No.

6 Q. Were you ever given a multiyear contract at
7 the seminary?

8 A. No.

9 Q. Do you believe that the men who served in the
10 capacity as professors in the School of Theology were
11 able to act as mentors for those men that were studying
12 to be pastors of local churches in the Southern Baptist
13 Convention?

14 A. Were they able, is that what you're asking?

15 Q. Yes.

16 A. I couldn't speak to any particular person's
17 qualifications.

18 Q. Did you ever see your colleagues that were
19 professors in the School of Theology that happened to be
20 men and where they acted as mentors for men who were
21 studying to be pastors in Southern Baptist churches?

22 A. I don't know of anybody actively, more
23 specifically.

24 Q. Will you agree with me it's the letter you
25 wrote in the summer of 2006 that severed your

1 relationship with the seminary?

2 A. But it was at the insistence of the seminary
3 that I write it.

4 Q. Do you agree with me that's what severed your
5 relationship with the seminary?

6 A. No, what severed my relationship with the
7 seminary was their refusal to continue my contract or
8 continue to keep me on for being with my reasonable
9 expectations.

10 Q. Did you ever have a contract in writing with
11 the seminary?

12 A. Other than the thing that we signed each
13 year, no.

14 Q. And this reasonable expectation that you talk
15 about, over what period of time was that supposed to be?

16 A. Well, normally the second half of the sixth
17 year of employment the evaluation process took place.

18 Q. And that did not take place?

19 A. No.

20 Q. Because you had been told that you would not
21 be given -- granted tenure by the president of the
22 seminary?

23 A. Well, I was never allowed or permitted to
24 continue my time at the seminary long enough to enable me
25 to go through the tenure track process.

1 Q. Okay. You understand that you didn't -- you
2 weren't there long enough to go through the tenure track
3 process. Right?

4 A. But that was not at my own will.

5 Q. In terms of the number of years that you were
6 there, you were not there long enough to go through the
7 tenure track process?

8 A. That's correct.

9 Q. You hadn't been there long enough to be
10 granted tenure?

11 A. That's correct.

12 Q. What's your -- what's your deal or agreement
13 with Taylor about tenure?

14 A. In -- you present a portfolio in the sixth
15 year and pretty -- very similar to Southwestern in terms
16 of based on performance and classroom, although there's
17 more emphasis on teaching, your involvement in the
18 community and all those things that I've already
19 mentioned before. You make a portfolio of those and
20 recommendations and letters from students and whatever
21 all else and evaluations and student evaluations and such
22 as that. Then -- then various principals make a judgment
23 on whether or not you'll be granted tenure. And if
24 you're not, then you have one more year to complete your
25 time in service there before you have to move on.

1 Q. And that's a fairly standard --

2 A. Yes.

3 Q. -- proposition even at Southwestern. Right?

4 A. Yes.

5 Q. The idea that you -- if you're not -- if you

6 don't make tenure, you usually have one more year there

7 and then you're out?

8 A. That's correct.

9 Q. You understood that's the situation that you

10 faced at the seminary?

11 A. That's correct.

12 Q. Have you -- yesterday a question was asked of

13 Dr. Patterson whether he was on any medicine that would

14 affect his ability to answer. The same question to you?

15 A. No.

16 Q. Have you seen any health care providers other

17 than normal health care issues since leaving the

18 seminary?

19 A. No.

20 Q. Have you ever gone to marital counseling?

21 MS. MERICA: Objection, relevance.

22 THE WITNESS: No.

23 BY MR. JOHNSON:

24 Q. Have you seen any health care providers other

25 than for normal things since -- and I'm talking about

1 annual checkups and things like that. Have you seen any
2 health care providers since the summer of '04?

3 A. No.

4 Q. Do you know of any males at the seminary who
5 have been granted tenure since Dr. Patterson coming as
6 president?

7 A. I -- those that I knew that were normally to
8 be considered or that were up for tenure -- of course, I
9 haven't been communicating with the seminary for quite
10 sometime, so I don't know.

11 Q. But do you know of any?

12 A. Well, I don't know.

13 Q. Affirmatively.

14 A. I don't know.

15 Q. With what you do know, do you know of any?

16 A. No.

17 Q. Have you kept up correspondence,
18 communication with anyone -- anyone at the seminary since
19 leaving in the summer of '06?

20 A. I may have e-mailed one or two individuals in
21 the fall.

22 Q. Who would those be?

23 A. Oh, I think I e-mailed George Klein once and
24 kind of updated what was going on, maybe. I probably
25 e-mailed Paul when he had his program. Paul Wolfe, his

1 radio program about getting some copies of some programs,
2 that kind of thing, but nothing --

3 Q. Nothing to do --

4 A. Nothing do with my job.

5 Q. I'm going to read you a statement and ask
6 whether you agree or disagree with it. Do you think that
7 the issue is not about women pastors, but is about
8 spreading a distorted view of women not based on
9 scripture, but contradictory to the true meaning of God's
10 word and to the spirit and power of the New Covenant
11 established by Christ himself?

12 MS. MERICA: Objection, form. And could I
13 ask that she be able to read that not knowing how long it
14 is?

15 BY MR. JOHNSON:

16 Q. I'll read it again. It's one sentence. I'll
17 read it again. Do you agree that the issue is not about
18 women pastors, but is about spreading a distorted view of
19 women not based on scripture, but contradictory to the
20 true meaning of God's word and to the spirit and power of
21 the New Covenant established by Christ himself?

22 A. What is the reference? That's the problem.

23 Q. The issue of whether or not there should be
24 women in the department -- School of Theology at the
25 seminary?

1 A. Okay, now read the question again now that I
2 have the reference.

3 Q. Do you agree that the issue is not about
4 women pastors, but is about spreading a distorted view of
5 women not based on scripture, but contradictory to the
6 true meaning of God's words and to the spirit and power
7 of the New Covenant established by Christ himself?

8 A. Yes, I do.

9 Q. And why do you generally agree with that?

10 A. Because the issue is not addressed explicitly
11 in scripture and I think that it is overreaching in
12 attempting to apply a scriptural truth in such a broad
13 way when it isn't addressed in scripture and when it
14 isn't clear and taking what is a personal view and
15 attempting to establish it as a religious dogmatic view.

16 Q. Are there scriptures dealing with the
17 relationship of men and women as -- insofar as teaching
18 or ruling or having authority over men?

19 A. With regard to the local church.

20 Q. And you -- you believe under no circumstance
21 that the seminary is a church?

22 A. That's correct.

23 Q. Okay. Nor do you believe that it's about the
24 mission and ministry -- that the seminary is about the
25 mission and ministry of the Southern Baptist Convention?

1 MS. MERICA: Objection, form.

2 BY MR. JOHNSON:

3 Q. You can answer.

4 A. It's -- it's just the way you're wording
5 this. Seminary is about that?

6 Q. Yeah, it is in the business. It has -- its
7 purpose of existence is to would be about the ministry
8 and the mission of the Southern Baptist Convention?

9 MS. MERICA: Objection, form.

10 THE WITNESS: It's to serve the
11 convention.

12 BY MR. JOHNSON:

13 Q. And how does it serve the convention?

14 A. By educating -- educating Southern Baptists.

15 Q. Including those persons that are going to
16 become men pastors -- the people that are going to be
17 pastors and in particular men who are going to be pastors
18 of the Southern Baptist churches?

19 A. And Christian educators and counselors and
20 Sunday School teachers and elementary schoolteachers and
21 -- you know, I mean just --

22 Q. I understand, but I thought from the
23 beginning you agreed that -- correct me if I'm wrong.
24 That you agreed that as far as the Southern Baptist
25 Convention, it -- it has the right and beliefs that

1 pastors of its local churches should be men?

2 A. That's correct.

3 Q. Does -- does the seminary -- the seminary
4 offer ed -- education to people that aren't going into
5 the Christian ministry?

6 A. I can't know what anybody's motives or ideas
7 are.

8 Q. Okay. Do you believe that's a part of the
9 mission of the seminary, is to educate persons or people
10 who are going into the Christian ministry?

11 A. It's to educate people.

12 Q. Do you think it has any relationship
13 whatever?

14 A. I think people go -- some people go to
15 ministry, but it educates people at large...lay people,
16 all kinds of people.

17 Q. But what did you -- what did you understand
18 the mission and purpose of Southwestern to be?

19 A. To -- well, it does prepare women and men for
20 Christian service. I guess I would agree with that.

21 Q. Did you -- did you -- have you talked with
22 any -- talked or communicated with any other persons in
23 the media other than what we've talked about today?

24 A. Yeah.

25 Q. Related to the claims in this lawsuit?

1 A. Related to the problem of being dismissed
2 from Southwestern, yes.

3 Q. Yes, who is that?

4 A. Let's see. I had several interviews. I'd
5 have to see if I could figure out who all it was. There
6 were several people that I've talked to in the media at
7 different times. Channel 8 News, for example, and the
8 folks there. You know, I think the Baptists Press and
9 various places. I couldn't list them all.

10 Q. Are there that many?

11 A. I would say that it's probably a dozen or
12 more.

13 Q. Okay. And what generally do you talk to them
14 about?

15 A. They asked me questions and I answered them
16 honestly.

17 Q. Did you ever contemplate suing individual
18 members of the board of directors -- board of trustees at
19 the seminary?

20 A. I don't believe so. I never contemplated
21 that.

22 Q. Do you think it would help you or hurt you in
23 your job searches now or in the future that you have sued
24 an employer?

25 A. I have no way of really knowing.

1 Q. Do you have -- do you think it would help or
2 hurt you in your professional future -- present or future
3 that you have threatened to sue the board of trustees?

4 MS. MERICA: Objection, form.

5 THE WITNESS: I have no idea.

6 BY MR. JOHNSON:

7 Q. Or to name them as parties in a lawsuit?

8 A. I have no idea.

9 Q. Have you talked or provided any information
10 to bloggers, whether or not they're part of the media?

11 A. Other than the discussion with Wade Burleson,
12 no. I --

13 Q. Do you approve of what Wade Burleson has done
14 on his blog?

15 A. It's not for me to approve or disapprove.
16 He's free to do whatever he wants to do with regard to
17 that. I don't involve myself in the blog or in
18 contributing to it or writing on it or giving him -- you
19 know, I mean in terms of other than to thank folks when
20 they had sent some money. I sent a "thank you", but that
21 was it.

22 (Exhibit No. 19 marked)

23 BY MR. JOHNSON:

24 Q. Okay, I'm going to show you what's been
25 marked as Exhibit 19. Can you thumb through that? Do

1 you generally recognize that as being out of the faculty
2 manual or handbook related to items that you were going
3 to be evaluated on --

4 A. Well, I recognize it from the evaluation.

5 MS. MERICA: Wait until he finishes.

6 THE WITNESS: I know. I recognize it from
7 the evaluation form.

8 BY MR. JOHNSON:

9 Q. Okay. Do you -- do you confirm like
10 beginning on the first page, ninety-nine, like number
11 three and following just with those numbers, that you
12 were being evaluated on your ministry skills?

13 A. In a sense.

14 Q. Do you agree that you were being evaluated
15 like on page one hundred, number four, your spiritual
16 leadership?

17 A. In a sense.

18 Q. And the same thing for number five, your
19 service?

20 A. Oh, yeah, faculty meetings and such, sure.

21 Q. You knew that you were being evaluated on
22 these matters as a part of being a professor in the
23 School of Theology?

24 A. Yes.

25 Q. What distinction do you make between the word

1 ministry and service?

2 A. Well, first of all, there's a broad view of
3 the word minister and ministry and a more narrow
4 definition, in my opinion. My understanding of the word
5 minister, which I have a tendency to use frequently, is
6 in the broad overall general sense. So, for example, a
7 woman ministers to her sick child, a nurse ministers to
8 sick people. Oprah goes and ministers to teen-age girls
9 in Africa. It's in terms of anything that we do that
10 serves another -- serves the needs of another. And so
11 when we think of the word minister or ministering, that's
12 how I use it, not with my sort of -- there's a more
13 narrow way of thinking of it in terms of ecclesiology and
14 with regard to what a pastor does.

15 Q. Can someone other than a pastor in the
16 Southern Baptist Convention be considered to be in the
17 ministry?

18 A. I don't know. No, I don't believe so.

19 Q. Only males who are pastors of churches are
20 considered to be in the ministry?

21 A. That's correct, at least that's my
22 understanding.

23 Q. You would tell other females in the Southern
24 Baptist Convention that they are not in the ministry?

25 A. I would.

1 Q. Does Exhibit No. 17 appear to -- I mean 17 --

2 A. That's 19.

3 Q. 19 -- I'm sorry, I'd reading upside-down.

4 Exhibit 19 appear to be a true and correct copy?

5 A. Yeah, I think it is.

6 Q. Okay. I'm going to show you what's going to

7 be marked as Exhibit 20.

8 (Exhibit No. 20 marked)

9 BY MR. JOHNSON:

10 Q. Can you identify that for me, please?

11 A. Yes, these are the answers to -- to the

12 faculty questionnaire which involves the BF&M.

13 Q. These are your answers?

14 A. Yes.

15 Q. Does Exhibit No. 20 appear to be a true and

16 correct copy?

17 A. Yes, it does.

18 Q. And I take it then you agree and still

19 believe your answers to Exhibit 20?

20 A. That's correct.

21 Q. And do you believe that that was a part of

22 the indication that you believed you were entering into

23 an ecclesiastical relationship with the seminary? That

24 they were looking for matters of belief as a group of

25 Christian believers, that you expressed similar beliefs

1 as they, that was part of the foundation on which you
2 went there?

3 MS. MERICA: Objection, form.

4 THE WITNESS: Well, I looked at my role as
5 being primarily nonecclesial.

6 BY MR. JOHNSON:

7 Q. How did you look at it as somewhat ecclesial
8 -- ecclesial?

9 A. Well, because I was teaching at an
10 institution that was aligned with Southern Baptists, but
11 as far as what I did myself, I wouldn't consider it to be
12 an ecclesial position. It was -- I thought pains were
13 taken to make it as nonecclesial as possible.

14 Q. But you understood that that was one of the
15 first courses that pastors of Southern Baptist churches
16 that were going to be pastors took as a part of their
17 education to become a Southern Baptist pastor?

18 A. And other students.

19 Q. I'm going to show you what's being marked as
20 Exhibit No. -- what number was the last one...20?

21 A. 20.

22 (Exhibit No. 21 marked)

23 BY MR. JOHNSON:

24 Q. Tell me what Exhibit No. 21 is, please.

25 A. It's the Faculty Evaluation Addendum for

1 '03/04.

2 Q. Does it appear to be a true and correct copy
3 of that?

4 A. Yes.

5 Q. I show you what's being marked as Exhibit No.
6 -- on Exhibit 21, are those your words?

7 A. Yes.

8 Q. Yeah. Does it appear to be a complete copy
9 of your response to the evaluation?

10 A. Yes.

11 (Exhibit No. 22 marked)

12 BY MR. JOHNSON:

13 Q. I'm going to show you what's being marked as
14 Exhibit 22. Did you receive this letter?

15 A. Yes.

16 Q. Does it appear to be a true and correct copy
17 of a letter you received?

18 A. Yes.

19 Q. Did you receive along the way the faculty
20 manual and any revisions to it while you were employed
21 with the seminary?

22 A. Yes.

23 (Exhibit No. 23 marked)

24 BY MR. JOHNSON:

25 Q. Okay. And I ask you to look at what's being

1 marked as Exhibit 23. Did you receive this letter?

2 A. I did.

3 Q. Does it appear to be a true and correct copy
4 of a letter you received?

5 A. It is.

6 (Exhibit No. 24 marked)

7 BY MR. JOHNSON:

8 Q. I show you what's being marked as Exhibit 24.
9 Is this a letter that you wrote?

10 A. Yes.

11 Q. Is it a true and correct of a letter that you
12 wrote?

13 A. Yes.

14 Q. Had you talked to anyone at the seminary
15 about going to Taylor?

16 A. Probably not until June when all of it
17 happened.

18 Q. Who did you talk to?

19 A. I may have mentioned it -- mentioned it to
20 Paul Wolfe, but didn't know anything at that point.

21 Q. Anybody else you talked to about deciding to
22 go to Taylor?

23 A. No, not that I can remember.

24 Q. Okay.

25 (Exhibit No. 25 marked)

1 BY MR. JOHNSON:

2 Q. Would you look at the two pages I'm handing
3 you as Exhibit 25?

4 A. Uh-huh.

5 Q. Tell me what that is.

6 A. That is a letter to Dr. Patterson asking him
7 to reconsider his recommendation for tenure for me.

8 Q. When you wrote that, were the words in there
9 true?

10 A. Yes.

11 Q. What did you do with it? After you wrote
12 this letter, what did you do with it?

13 A. I thought I had sent it to Dr. Patterson at
14 some point.

15 Q. What -- when -- did you write it of your own
16 volition in around August of '04?

17 A. Sure.

18 Q. Did anybody ask you to write it?

19 A. No.

20 Q. And did anybody help you construct anything
21 in it?

22 A. Well, no, other than Paul Wolfe did look at
23 it after it was written.

24 Q. Okay. And tell me about that.

25 A. He said he didn't think that it would change

1 anything.

2 Q. Did you change any of the wording?

3 A. No.

4 Q. As you look over it today, is it true?

5 MS. MERICA: Objection to form.

6 THE WITNESS: Yes, I do.

7 (Exhibit No. 26 marked)

8 BY MR. JOHNSON:

9 Q. I show you what's being marked as Exhibit 26.
10 Can you tell me what that is?

11 A. That is my supplement to my evaluation of
12 '04/05.

13 Q. And so is it in your words?

14 A. Yes.

15 Q. And is that true?

16 MS. MERICA: Objection, form.

17 THE WITNESS: In essence, it is, though I
18 probably would have rephrased some things.

19 BY MR. JOHNSON:

20 Q. What would you change?

21 A. Well, in the confidential section that I
22 asked not to be attached, it states that I have been
23 asked to make a transition to another academic community
24 and yet that really wasn't -- I mean that probably might
25 not have been the best way to express my position at this

1 point in time when I was still anticipating that I was
2 teaching at -- at Southwestern.

3 Q. That's -- that's -- that's what you say now
4 looking back?

5 A. Well, I wish I would have put it more
6 succinctly and more accurately.

7 Q. Now as you look back having sued the
8 seminary?

9 A. No, as I look back at what has happened since
10 then.

11 Q. Including your lawsuit?

12 A. Well, no, probably before the lawsuit.

13 Q. Tell me about at Taylor. What is your base
14 salary there?

15 A. I think it was like about forty-one three.
16 Forty -- forty-one thousand three hundred.

17 Q. For what period of time?

18 A. Well, it's a nine-months paid over twelve
19 months.

20 Q. And is that for the '06/07 year or for the
21 year we're entering now?

22 A. '06/07.

23 Q. And what is it this year in '07/08?

24 A. It's about forty-two something.

25 Q. What benefits do you receive in addition to

1 salary?

2 A. Hospitalization. I wasn't qualified for --
3 wasn't qualified for retirement when I first came there,
4 so I had to wait a year before I could even be involved
5 in that, so retirement this year. I pay life insurance.

6 Q. What is -- do you know the value of the
7 health insurance?

8 A. No, I don't know offhand.

9 Q. Do you know the terms of the retirement plan,
10 what they contribute or match?

11 A. I -- no, I can't -- I don't know that off the
12 top of my head.

13 Q. Did you ever take COBRA out as you left the
14 seminary to continue any health care benefits?

15 A. No, it -- I automatically -- when I left the
16 seminary, it automatically began at the other place.

17 Q. So you did not miss a month of health
18 insurance?

19 A. I may have -- we may have -- we -- I'm not
20 sure. I won't -- I --

21 Q. Do you know of any?

22 A. I don't think we did, but we may have because
23 I remember having to get the old insurance forms from
24 them claiming that we were covered for the new, so I
25 don't remember that we did. But we might have had a

1 month when we didn't have insurance.

2 Q. Okay. Did you ever have any -- did you have
3 the option of taking out continuing health insurance when
4 you left the seminary?

5 A. I -- well, I -- I would assume I did, but I
6 would never have been able to afford it.

7 Q. Did you elect to ever exercise that option?

8 A. No.

9 Q. What's -- how much is the difference in
10 health insurance plans between the seminary and Taylor?

11 A. I don't see a lot of difference.

12 Q. Okay. Did you ever -- what is?

13 A. Oh, wait, I take that back. I'm sorry. I
14 have to pay mine where I -- where I am now.

15 Q. What do you pay?

16 A. I pay about \$95.00 every two weeks.

17 Q. Okay.

18 A. So I didn't have to pay for it at
19 Southwestern, to it's \$200.00 a month essentially.

20 Q. Okay. Any other difference in benefits
21 between the two places?

22 A. Not really.

23 Q. Do you have the chance to receive additional
24 compensation at Taylor by teaching more than a normal
25 load?

1 A. Yes, but it's not customary.

2 Q. Okay. How many hours do you have to teach
3 for the salary you told me about?

4 A. Twenty-four.

5 Q. And what has been your teaching load in
6 '06/07?

7 A. Twenty-four.

8 Q. And what is it '07/08?

9 A. Twenty-six or twenty-seven, I think.

10 Q. And how much do you receive for -- above
11 twenty-four in teaching responsibilities?

12 A. It's about -- gross, it's twenty-one hundred,
13 but net, it's maybe sixteen hundred.

14 Q. Per hour?

15 A. No.

16 Q. Per course?

17 A. Yes.

18 Q. Were you promised overload teaching at the
19 seminary?

20 A. No, but I always had it.

21 Q. Are you promised overload teaching where you
22 go --

23 A. Never, no.

24 Q. Well, --

25 A. You're awful lucky if you can get it.

1 Q. Do you have any additional compensation,
2 means of getting additional compensation at Taylor other
3 than the overload teaching?

4 A. No, not at the moment.

5 Q. Who made the decisions at the seminary
6 whether or not you were able to teach on an overload
7 basis?

8 A. Probably Dr. Blaising and whoever all else
9 was involved in scheduling. I don't know.

10 Q. Is that something you asked to do whenever
11 possible?

12 A. I was always open to do it.

13 Q. Yeah. The seminary made those assignments to
14 help you out on a financial basis?

15 A. I don't know whether they did or whether they
16 needed somebody to teach those classes, so I'm not sure.

17 Q. Okay. Did the seminary -- did you ever miss
18 a paycheck from the seminary?

19 A. No, I don't think so.

20 Q. What administrative responsibilities did you
21 have -- do you have at Taylor?

22 A. Right now I don't have any.

23 Q. Did you have administrative responsibilities
24 at the seminary?

25 A. Only on the editorial board for the

1 Southwestern Journal and that was -- that was really the
2 only possible thing that could be conceived in that way.

3 Q. Okay. Did you have advising responsibilities
4 at the seminary?

5 A. With regard to course choices.

6 Q. To what?

7 A. Course choices.

8 Q. Who did you advise?

9 A. Whoever I was assigned.

10 Q. Do you have advising responsibilities at
11 Taylor?

12 A. Oh, yes.

13 Q. Similar?

14 A. Yeah, except quite a number more.

15 Q. How many -- how many teaching -- how many
16 students did you advise at the seminary versus Taylor?

17 A. Well, usually it was anywhere from three to
18 five per -- per semester at Southwestern and it's
19 probably somewhere in the neighborhood of twenty to
20 thirty per semester at Taylor.

21 Q. Okay. And Taylor is not a seminary, is it
22 not?

23 A. No, it's an undergraduate. Well, it's a
24 university, so it does have some graduate programs, but
25 it's mostly undergraduate.

1 Q. Right. Did -- did you have supervising
2 responsibilities of males in the School of Theology at
3 seminary?

4 A. With regard to course schedule.

5 Q. Did you advise about which courses to take?

6 A. Only in -- in conjunction with the course
7 plans that were already laid out by the administrators.

8 Q. Did you ever advise a student as to which
9 courses might help them better in the pastorate?

10 A. No, not really.

11 Q. Do you --

12 A. Nobody ever asked.

13 Q. Do you think that male students who are going
14 to be pastors, studying to be pastors would be interested
15 in talking to you as their adviser about which courses
16 would help them the most in the pastorate?

17 A. I doubt it.

18 Q. What's the expectation for research and
19 writing at Taylor?

20 A. It is difficult to do only because you're so
21 busy. You have a lot -- big classes, lots of student,
22 lots of grading, lots of advising and more hours.

23 Q. Is that the expectation then?

24 A. Well, you're supposed to do some and I manage
25 to do it, but it's more difficult to do it in that

1 environment.

2 Q. Well, --

3 A. There's not a library that's really good.

4 Q. What -- what student groups did you work with
5 at the seminary versus students groups you work with at
6 Taylor?

7 A. Well, I worked with doctrinal students in a
8 limited capacity. I worked with master's students a
9 great deal. You know, just their MAs, and taught some
10 graduate level courses.

11 Q. In the School of Theology?

12 A. Yes.

13 Q. What student groups do you work with at
14 Taylor?

15 A. Undergraduates.

16 Q. In what way, what groups? Teaching, you're
17 just talking about they're in your classes?

18 A. Yes.

19 Q. Did you have any responsibilities with the
20 students groups at either school, Taylor University or
21 the Southwestern Seminary, that were outside the
22 classrooms? Student group work outside the classroom?

23 A. The only thing I can think of perhaps was
24 that we were working on establishing and keeping Ada Beta
25 Role, which was a Hebrew -- a biblical Hebrew group, but

1 nothing -- other than being president of that while I was
2 a student. I don't think we ever resurrected that.

3 Q. Are you -- have any expected church
4 involvement at Taylor?

5 A. They're more geared towards community
6 service.

7 Q. What's the expectation on community service?

8 A. That you're involved with the Taylor
9 community and the students and that you're involved in
10 the outside community as well.

11 Q. Do -- are you evaluated on your ministry or
12 performance skill there?

13 A. Ministry performance, no.

14 Q. Are you evaluated on spiritual leadership
15 there?

16 A. No, integrity, though, but that would be
17 typical of any reasonable school.

18 Q. And are you evaluated on your service to the
19 school there?

20 A. Sure.

21 Q. Okay. Have you been promised any length of
22 employment at Taylor?

23 A. Just the typical that if you continue to --
24 continue to develop professionally and continue to
25 maintain teachability, their regular evaluations and such

1 as that, that you're continued on tenure track unless
2 there's a problem.

3 Q. Do I understand that the tenure tracks were
4 similar in length?

5 A. Yes, in general it seems -- that seems to be
6 the role in academia.

7 Q. Do you have a written contract of employment
8 with Taylor?

9 A. It's very similar to what we do at
10 Southwestern.

11 Q. Where your rate of pay for one year is
12 expressed?

13 A. Yes. There's something I'd like to say and I
14 can't think of what it is. Anyway, hopefully it will
15 come back to me.

16 Q. Did you think of your work at Southwestern as
17 one that in part was training pastors for the local
18 church?

19 A. No, I really didn't.

20 Q. Did that come across to your students that --

21 A. I would --

22 Q. -- you did not consider them -- that you were
23 training them to be pastors?

24 A. I would hope it did.

25 Q. And why do you want them to understand that

1 you were a professor in the School of Theology teaching
2 them Hebrew language and how it works as a grammar and
3 wanted them to know that you were not preparing them to
4 be pastors?

5 A. Well, in essence, the preparation of them for
6 the pastorate would have been -- lies with -- lay with
7 the pastoral -- the pastoral ministries team, the
8 pastoral -- those who taught sermon preparation and
9 delivery and other issues with regard --

10 Q. Were --

11 A. -- to pastoring.

12 Q. I'm sorry, anything else?

13 A. No.

14 Q. Where else were they learning to read the
15 scripture in its original text?

16 A. Well, I'm sure other professors were teaching
17 it as well.

18 Q. Other professors taught the same thing you
19 did?

20 A. Yes.

21 Q. If somebody took it in your class, then
22 they'd have to repeat it in another class?

23 A. That's not true, no.

24 Q. Meaning they might have one professor or the
25 other?

- 1 A. That's correct.
- 2 Q. But for the ones that were in your classes,
3 how else were they being taught to read the scripture in
4 its original text?
- 5 A. You mean in -- I'm not sure I follow your
6 question.
- 7 Q. How to read the Hebrew text.
- 8 A. They were taught how to read the Hebrew text,
9 yes.
- 10 Q. In your class?
- 11 A. Yes.
- 12 Q. They weren't being taught that in another
13 course?
- 14 A. No.
- 15 Q. Do --
- 16 A. I don't know -- I don't know about pastoral
17 preparation and sermon, I don't know if they did. I
18 would guess they did language stuff, but I don't know,
19 no.
- 20 Q. The same language stuff you taught?
- 21 A. Well, in a different level for preparation of
22 exposition and teaching.
- 23 Q. What is the utility of knowing the Hebrew
24 language and its method of grammar in sermon preparation?
- 25 A. To determine the relationship of words to one

1 another in sentences and clauses and how that
2 communicates meaning.

3 Q. You told me earlier that you had a spiritual
4 formation class?

5 A. That's correct.

6 Q. Tell me what that -- what the purpose or
7 syllabus of that class was for.

8 A. That was in order to encourage students to
9 think with regard to their spiritual lives and help them
10 develop a path of, you know, regular prayer life,
11 service, bible study, things like that. You know, good
12 habits -- good spiritual habits and such as that.

13 Q. And is that something that is expected of a
14 professor in the School of Theology?

15 A. Yes.

16 Q. Did you counsel students in -- in any form or
17 fashion?

18 A. Well, that's a broad question. I suppose I
19 did.

20 Q. In what form or fashion?

21 A. When students had a difficulty with, for
22 example, a thesis topic, if students had a problem with
23 something that was in class with regard to -- you know,
24 they were struggling in the class, not passing, perhaps.
25 I had a student who had cancer and had several little

1 children and working with him to help him and accommodate
2 him in whatever ways I could when he was in my classes.
3 I remember a student coming to me because his wife had
4 been -- had a nervous breakdown. And so in those ways
5 not so much counseling, but they were telling me what the
6 situation was, you know. Mostly -- mostly academic
7 things, though.

8 Q. Did --

9 A. I mean nothing -- nothing personal. There
10 were really no personal counseling or advising sessions.
11 I had one student come to me who had most of his -- one
12 lung -- well, all of one lung and part of another removed
13 at one point and he came to me and he was talking about
14 suicide, but I directed him to someone with more skills.
15 So in general, it was mostly academic sorts of things.

16 Q. Did it ever -- did students ever present
17 themselves with the decision to be made about to continue
18 in the School of Theology or what it takes to become a
19 pastor?

20 A. What it takes to become a pastor, no;
21 continuing in the School of Theology, perhaps.

22 Q. Did I understand earlier you were -- I know
23 your membership is still at First Baptist Dallas, but is
24 that where you have been a member since coming to Texas?

25 A. No.

1 Q. How did you come to be a member of First
2 Baptist Dallas?

3 A. Well, I was -- of course, I went to Criswell
4 College and I had colleagues there and I knew people
5 there and we were at a satellite church that was actually
6 sponsored -- like a mission church that was sponsored by
7 First Baptist Dallas and that church closed and so we
8 needed a place to connect right away and so we just went
9 ahead and went to First Baptist Dallas because we knew
10 folks there.

11 Q. Have you talked to any members of First
12 Baptist Dallas about your claims in your lawsuit or your
13 terms and conditions of employment at the seminary?

14 A. No, not that I can think of.

15 Q. Did you consider yourself to minister to
16 students just by listening to them?

17 A. Well, it was a way I could serve them.

18 Q. Did you consider that a part of your ministry
19 at the seminary?

20 A. I considered it part of my job.

21 Q. You considered ministry as a part of your
22 job?

23 A. I considered listening to students as part of
24 my job.

25 Q. Okay. Did you consider listening to students

1 as -- as a way of ministering to students?

2 A. I considered it a way of serving students.

3 Q. Did you consider it as a way of ministering
4 to students?

5 A. In a broad general overall sense.

6 Q. Did you consider that as a way that you were
7 fulfilling your -- partially fulfilling your requirements
8 to be involved in ministry?

9 A. Not -- not -- not exactly. My involvement in
10 ministry was limited to teaching seventh-grade Sunday
11 School girls.

12 Q. Okay. Did you consider your meeting with
13 students, listening to students as a part of your
14 ministry?

15 A. I considered it as a part of my job.

16 Q. Okay. But not a -- not a part of your
17 ministry?

18 A. Not necessarily, no.

19 Q. Okay. Did you -- did you consider listening
20 to them and praying with them as a part of your ministry?

21 A. It's difficult for me to in any case remember
22 praying with a student other than if that student did the
23 praying.

24 Q. Meaning you had a --

25 A. If there was -- for instance, if there was a

1 male student, the male student did the praying.

2 Q. Because you had a rule that you would not
3 pray with male students?

4 A. No, because I just felt that that was
5 appropriate.

6 Q. Oh, on your house. What did you buy your
7 house for and what did you sell your house for?

8 A. \$125,500.00 with a \$20,000.00 down payment
9 that we had gotten from our previous house which we had
10 gotten from my husband's father. And so we sold the
11 house for a hundred and nine and then had to subtract the
12 real estate people and all that.

13 Q. Okay. Did you have anything that turned up
14 on the inspection report that had to be taken care of or
15 showed a problem with your home?

16 A. It was bought as-is.

17 Q. Who is the buyer?

18 A. I don't remember, I'd have to look. It was
19 somebody who was going to redo it and turn it over or
20 something. I don't know. It was on the market quite
21 awhile. We were desperate to get out from under it at
22 that point.

23 Q. Do you take some pride in having taken on the
24 seminary on this issue?

25 A. Not at all.

1 Q. Do you -- do I understand correctly that
2 you're claiming moving expenses as damages?

3 A. I do.

4 Q. How much?

5 A. Just the moving expenses? About four to five
6 thousand dollars.

7 Q. Have you deducted those from your tax returns
8 from 2006?

9 A. I probably have with -- well, anyway, yeah, I
10 have.

11 Q. Do you want the seminary -- did it guarantee
12 you some length of -- number of years of employment
13 there?

14 A. You mean at Southwestern?

15 Q. Yeah, the seminary.

16 A. Nothing other than the tenure track, seven
17 years business.

18 Q. And how was that guarantee of seven-year
19 employment expressed?

20 A. Well, I don't know that it was a guarantee.
21 It seemed to be a commitment on both parties by assigning
22 -- a professor as a tenure track versus nontenure track,
23 that there was some sort of commitment being made on the
24 part of the seminary in terms of a reasonable expectation
25 that one progressed professionally, academically and so

1 forth, that -- that one could anticipate continuing at
2 the seminary and that one did not teach contrary to the
3 Baptist Faith and Message or engage in immoral servitude
4 or some kind of ethical violation.

5 Q. And that would get you to the tenure process?

6 A. That's correct.

7 Q. No guarantee of being granted tenure?

8 A. No, no guarantee.

9 Q. And a tenure could be granted or not for any
10 reason?

11 A. That's what I hear.

12 Q. That's what you understood?

13 A. I guess.

14 Q. Okay. So there was under no circumstance a
15 representation or guarantee of employment for more than
16 what you are claiming to be the seven-year of tenure?

17 A. I don't think there was any formal guarantee,
18 no.

19 Q. Okay. Have you had to seek a health care
20 provider or counseling in any form or fashion related to
21 leaving the seminary?

22 A. No, other than stress on my husband, which
23 has been a problem, it was at least --

24 Q. Are you seeking money for your husband from
25 the seminary?

1 A. Well, I would like to -- there is a
2 difficulty with my husband in terms of we've moved to a
3 very rural area, which is one reason why I'm not
4 affiliated with a Southern Baptist church because we're
5 in a very rural area and there aren't Southern Baptist
6 churches nearby. And in seeking some kind of work -- the
7 pay scale there is half of what he was able to earn when
8 he was in Texas and so -- when he was working. And when
9 he was seeking a job he had a hard time finding one.
10 When he could find one, they paid very, very low there
11 because then he -- pretty low on the economic scale right
12 now. And, of course, all of this has placed a tremendous
13 amount of stress on him and worry, just the whole moving
14 process and -- moving and uprooting and going to a place
15 and then having difficulty finding a job with his health
16 limitations and such as that. And what he was able to
17 find is -- was not helping -- is not helping us very
18 much.

19 Q. How much money do you want the seminary to
20 pay your husband?

21 A. I think that I talked about the differences
22 between what he was able to make in Dallas/Fort Worth
23 versus what he's able to make where he is now.

24 Q. How much?

25 A. The difference.

1 Q. How much?

2 A. I don't know. It's about \$14,000.00,
3 \$15,000.00 a year.

4 Q. Forever?

5 A. Oh, no, for those -- for -- for the two --
6 for the two years since we've started the lawsuit or
7 year, whenever we started the lawsuit. We've only been
8 there two years.

9 Q. But ending after two years?

10 A. I don't know. I don't -- I don't know how to
11 answer that question.

12 Q. Have you talked to Dr. Fuller in this case?

13 A. Yeah, I believe. The economist guy, is that
14 who --

15 Q. I just want to know whether you've talked to
16 him.

17 A. Yes.

18 Q. What have you told him?

19 A. Essentially went through and talked about our
20 various expenses and the differences between the seminary
21 and where we are now, our problems with our house in
22 selling it, losing all our money in it, not being able to
23 buy other house now and a lot of other issues.

24 Q. Did you buy a bigger or smaller house?

25 A. We couldn't buy a house.

- 1 Q. Do yo live in a house?
- 2 A. We rent a house. We've had to move twice in
3 six months.
- 4 Q. Is cost of living there more or less than
5 Fort Worth?
- 6 A. In many ways more, in a few ways less.
- 7 Q. Which way is more and which way is less?
- 8 A. You can -- I think you can buy more house
9 there for the money, but because we live in a rural area
10 and we're far away from city life, everything is more
11 expensive. Groceries are more expensive, gas is more
12 expensive. Taxes are less expensive where we live, but
13 they're triple in Indiana -- Indianapolis. Rent is very
14 high. So goods and services are in general more
15 expensive.
- 16 Q. Are you trying to leave there?
- 17 A. Right now, no, my daughter is in high school
18 still and I've got to maintain some consistency.
- 19 Q. Are you entertaining leaving there after she
20 graduates from high school?
- 21 A. I have no idea at this point.
- 22 Q. Have you sought employment anywhere else
23 since going there?
- 24 A. Yeah.
- 25 Q. Where?

1 A. Wheaton.

2 Q. Pardon?

3 A. Wheaton.

4 Q. Wheaton? Have you written to Wheaton?

5 A. Or awhile -- it was awhile ago.

6 Q. Have you heard back from Wheaton?

7 A. Oh, yeah, it's a -- no, that was awhile ago.

8 Q. Have you tried to -- have you communicated
9 with any other institution, university, seminary about
10 employment --

11 A. No.

12 Q. -- since going there?
13 Did I remember something that you said you
14 were getting ready to go somewhere else to teach when the
15 communicatioins started happening in '02 about staying at
16 Southwestern?

17 A. That's correct.

18 Q. Where was that?

19 A. Union University.

20 Q. Had you signed anything with Union?

21 A. I had.

22 Q. What?

23 A. An agreement to come there to teach.

24 Q. You had?

25 A. Yes.

- 1 Q. And --
- 2 A. I rescinded it because of my -- the unusual
3 circumstances of our life at the time.
- 4 Q. Are you trying to get back to Texas?
- 5 A. That would be really great.
- 6 Q. Are you trying to get back?
- 7 A. I would like to, but I don't know that that's
8 a reality or a possibility. My family is here. All of
9 our family is here.
- 10 Q. Tell me what family you do have in the
11 Metroplex area.
- 12 A. My grandparents.
- 13 Q. And their -- and by name. I just want to
14 know what relatives you have in this area by name.
- 15 A. Frances and Les Hooker, Dianne -- Dianne and
16 Harold Smith. Cindy -- well, John and Cindy Moyer and
17 all their kids and so forth.
- 18 Q. Okay, the Hookers are --
- 19 A. My grandparents.
- 20 Q. -- grandparents? Smith goes to?
- 21 A. My parents.
- 22 Q. Your parents' name and --
- 23 A. At least my mom and her new husband because
24 my dad died from the cancer.
- 25 Q. And then the other large family, Moyer?

1 A. Moyer, yeah, it's my sister and her family.

2 Q. Where do these three families live?

3 A. On the east -- northeast part of Dallas.

4 Q. When you first started looking for other
5 places in August of '04, generally what reception did you
6 get when you were trying to leave Southwestern?

7 A. Pretty cold.

8 Q. And why? In your opinion, why?

9 A. Because there are many institutions that
10 don't look at an education at Southwestern as being of
11 the same quality of an education from a perhaps more
12 well-funded, popular, populous secular school.

13 Q. Do you still have that feeling about how
14 other institutions look upon your degree?

15 A. I get that sense, yes.

16 Q. Do you consider Wade Burleson a friend?

17 A. In a sense. I don't know him very well,
18 truthfully, but as opposed to somebody who is an
19 adversary, certainly.

20 Q. The same for Ben Cole?

21 A. I don't know Ben Cole, really. I -- it's --
22 I don't really know him.

23 Q. Do you think that any institution, whether it
24 be Taylor or Southwestern, has a prerogative of who they
25 want to be on tenure track and to stay on tenure track

1 and to grant tenure to?

2 A. I don't know if it matters what I think.

3 Q. You are willing to go by whatever that
4 school's bylaws and faculty manual and handbooks say on
5 the issue?

6 A. As I understand them, yes.

7 Q. Okay. Have you had any publications -- when
8 is the last time you had a publication?

9 A. Oh, let's see. I did some dictionary
10 articles. This one on Zion, it's not quite -- it's --
11 they're setting it. I don't know if it's been published
12 yet. I had some before that. I have about nine
13 dictionary articles that I'm working on currently. I've
14 got -- I just -- I'm getting ready -- I did the prototype
15 and will be receiving a contract to do a commentary on
16 the Book of Isaiah for Zonderman. I have two book --
17 encyclopedia book things that I have to do. So I've done
18 some things for Broadman & Holman with regard to the
19 Apologetics Study Bible and then there's now a -- there's
20 now a -- another kind of study bible that I did the notes
21 on Psalms for by Broadman.

22 Q. What amount of comp -- is that -- excuse me.
23 Were you finished?

24 A. Yes.

25 Q. What amount of compensation are you receiving

1 for these publications?

2 A. Different amounts.

3 Q. Okay. Can you tell me what they might add up
4 to total-wise?

5 A. It depends on what year. It's starting to
6 get to be more.

7 Q. Just approximately.

8 A. It really depends on the project. I mean
9 little projects might pay as much as a hundred dollars
10 and, you know, a big project like the notes to the Psalms
11 thing back whenever that was -- a few years ago, that was
12 like \$4,000.00, so it just really depends.

13 Q. How much did you earn -- how much have you
14 earned on these projects since leaving the seminary,
15 approximately?

16 A. Oh, maybe \$7,000.00, \$8,000.00 altogether.

17 Q. How did you get in contact with Zonderman and
18 Broadman?

19 A. They contacted me.

20 Q. Did anyone at the seminary help you in that
21 contact?

22 A. No.

23 Q. Do you consider yourself as a professor in
24 the School of Theology when you were at the seminary?
25 Was that a position of authority over the students?

1 A. No, it was not. It was a position of service
2 and I served under the authority of men.

3 Q. Under the authority of --

4 A. The administrators, who were men.

5 Q. And willing to serve in that capacity under
6 the authority of the administrators that were men?

7 A. Yes.

8 Q. Can you tell me how much money you are asking
9 for for mental anguish?

10 A. I don't recall.

11 Q. Do you believe you've suffered mental
12 anguish?

13 A. I certainly do.

14 Q. Describe that.

15 A. I have been under a tremendous amount of
16 stress with the moving process. My daughter had to be
17 uprooted from her sophomore year of high school to move.
18 We struggled financially as a result of the various
19 things that happened in connection with having to take a
20 less position somewhere else. Concerns about my
21 husband's health and the concerns about our finances and
22 so forth. Stress over and anguish over how this could
23 have been done to me when I did everything I possibly
24 could to -- to meet the needs of the seminary and do all
25 I could professionally and -- being separated from my

1 family, not being able to see them. My grandmother is in
2 her nineties and we were very close and now I just rarely
3 have opportunity to see her. A lot of different things
4 like that.

5 Q. Anything else that you can think of today?

6 A. Just feeling like this in some way makes me
7 less -- less valuable professionally, this -- this whole
8 business with Southwestern did because folks are always
9 trying to figure out if there's some other reason other
10 than what you're saying and they're dubious about all of
11 that and --

12 Q. How do you explain what happened when someone
13 asks you that?

14 A. Well, I explain Dr. Patterson's view of -- of
15 that section in the Baptist Faith and Message and that my
16 serving there at the seminary -- he opposed that because
17 of his view.

18 Q. Can you put a dollar amount on the amount of
19 money you claim for mental anguish?

20 A. I don't -- I don't know. I don't know about
21 those things.

22 Q. But are you able to?

23 MS. MERICA: Objection, asked and
24 answered.

25 THE WITNESS: I don't know how to value

1 that.

2 BY MR. JOHNSON:

3 Q. Okay. Do you want to punish the seminary?

4 A. No.

5 Q. Do you know -- have you talked to Richard

6 Land?

7 A. No.

8 Q. Have you talked to Royal Smith?

9 A. Not that I can remember.

10 Q. Have you talked to a trustee, I think the

11 first name was Lollie?

12 A. No, never. I didn't even know who she is. I

13 assume she's a she.

14 Q. Yes, that was -- I'm using a name from

15 yesterday.

16 A. Yeah, I wasn't sure if that's a gal.

17 Q. Do you believe your election to the faculty

18 was unanimous?

19 A. Well, that's what I thought and that's what I

20 read in the newspapers and that's what -- but obviously

21 there was some -- there was some -- I did know about that

22 there were a couple of trustees that had some -- had some

23 reservations, so I don't know other than what was

24 published and what was said.

25 Q. Do you have any belief if -- to disprove --

1 if somebody said they voted against you, do you have any
2 reason to disprove that?

3 A. No, I have no way. I wasn't involved.

4 Q. Tell me -- you did not have a manuscript or
5 notes from which you taught?

6 A. No, I mostly used different books, so --

7 Q. Did you use film?

8 A. No film.

9 Q. Did you use video?

10 A. Yeah, once.

11 Q. What's that?

12 A. A VeggieTale story of Jonah.

13 Q. What is that? I'm not familiar with that.

14 What is that?

15 A. It's a cartoon.

16 Q. Did you ever talk with a person identified
17 yesterday as Danny Akin?

18 A. No.

19 Q. Do you believe the Baptist Faith and Message
20 speaks solely and completely on all issues in Southern
21 Baptist life?

22 A. No.

23 Q. Have you had any conversations with Dr. Joel
24 Gregory?

25 A. No, I have not.

- 1 Q. Did you ever meet Dr. Patterson before he
2 came to the seminary as the president?
- 3 A. No, I did not.
- 4 Q. Did you always have full classes?
- 5 A. I -- that's -- that's a relative question. I
6 had many full classes.
- 7 Q. Was there a trend?
- 8 A. There seemed to be.
- 9 Q. What was that?
- 10 A. It seemed to be that as -- as I was at the
11 seminary, that my classes were full. They'd fill up
12 first.
- 13 Q. Do you --
- 14 A. Certain ones.
- 15 Q. Certain of your classes?
- 16 A. That's correct.
- 17 Q. Which ones?
- 18 A. The Biblical Hebrew I and II, for example.
- 19 Q. The --
- 20 A. Exegetical method. The others were electives
21 and many times were taken by people who were doing MAs
22 or, you know, so -- so just those three.
- 23 Q. Okay. And is that because you're talking
24 about the scripture in its original --
- 25 A. They had --

1 Q. -- text?

2 A. They're learning the language.

3 Q. And they're leaning the language of the
4 original text of the scripture?

5 A. Yeah, that we are able to have, yes.

6 Q. And no doubt in your mind that's a building
7 block for those persons wanting to be pastors?

8 A. Well, they're pastors that are pastors
9 without doing it.

10 Q. No, but those that are in school?

11 A. And other people.

12 Q. What -- were your evaluations from -- do I
13 understand that your evaluations from administration,
14 students and peers, you always say were the highest and
15 excellent?

16 A. No. Well, they weren't the highest. That's
17 overreaching.

18 Q. How --

19 A. Overstating.

20 Q. How would you characterize them?

21 A. That they were -- that student evaluations,
22 for the most part, were high and that I usually received
23 excellent in most cases in the faculty evaluation except
24 maybe perhaps in the ministry thing because I don't
25 preach and I don't have speaking engagements and things

1 like that. I did Sunday School for girls.

2 Q. What's the -- do you know how your

3 evaluations from students compared to other faculty?

4 A. Oh.

5 Q. I don't know whether you were given that

6 information.

7 A. That's not -- I don't think that I'm really

8 given that information.

9 Q. Were you given that information as it relates

10 to peers?

11 A. No.

12 Q. Did you know about reviews from

13 administration point of view as it relates to peers?

14 A. No.

15 Q. Have you noticed somehow Mrs. Patterson's

16 title change on the web site at the seminary?

17 A. No, I -- no, not really.

18 Q. Do you agree as a part of your statement

19 earlier that you were operating willingly under the

20 authority of the men, the administration of the

21 Southwestern Baptist Theological Seminary, that those

22 administrators had authority to deal with the faculty?

23 A. Yes.

24 Q. Do you know something in particular about a

25 pulpit being burned at the seminary?

1 A. It's rumor as far as I know.

2 Q. While -- since August of '90 -- I mean since
3 August of '04, when you began looking for another
4 position, did you keep someone on the -- at
5 administration or faculty advised about your efforts,
6 updates about your job search?

7 A. Nothing on a regular basis.

8 Q. Even if it's not a regular basis, who would
9 you have kept up-to-date on that, if you kept anyone
10 up-to-date?

11 A. Well, I didn't really keep anybody
12 up-to-date.

13 Q. Who did you talk to about that?

14 A. Paul Wolfe. Paul Wolfe.

15 Q. Paul Wolfe. Have you ever understood the
16 phrase of employment at will?

17 A. Yes and no.

18 Q. Where have you heard that?

19 A. From you all.

20 Q. Pardon?

21 A. From you all.

22 Q. Since the lawsuit?

23 A. Yes.

24 Q. Did you ever hear about the phrase employment
25 at will before the lawsuit?

1 A. Maybe in a general over -- overall sense, but
2 I never really quite got -- got into it.

3 Q. What did you understand it before you filed
4 the lawsuit?

5 A. That supposedly -- and this didn't seem right
6 to me and that's why I don't know that I really
7 understand it, except to say that it seemed that
8 supposedly in Texas you can hire and fire people for any
9 reason whatsoever, you don't have to give them a reason.

10 Q. Do you -- how many years do you understand
11 the seminary to have had -- in the School of Theology
12 only at the seminary. The School of Theology, that in
13 terms of those persons who taught pastors, future
14 pastors, and how many years did you understand there to
15 be women in that role?

16 A. Well, for instance, when I was teaching at
17 the doctoral -- or when I was teaching as a doctoral
18 student as a teaching fellow, I was doing it and there
19 were other gals that were doing it. There were other
20 gals that taught at the seminary, so I don't know how
21 many years.

22 Q. Who -- who were the other gals that were in
23 the School of Theology teaching future pastors?

24 A. I believe -- I believe Sheryl Grites was
25 there. Of course, Karen Bullock, who was part of the

1 faculty for a bit, and various -- you know, so various
2 doctoral students of the female persuasion taught
3 individual classes as a part of their doctoral training.

4 Q. But have you ever determined how many of them
5 --

6 A. No, I don't --

7 Q. -- as far as --

8 A. -- know how many.

9 Q. Have you ever determined how many of them and
10 for what period of time taught at the School of Theology
11 to men who were going to become pastors?

12 A. No class -- well, no class was ever totally
13 everybody is going to become a pastor, so, you know, I
14 mean I --

15 Q. I'm going to ask you -- the exhibits that
16 were used yesterday, I think this will go fast.

17 A. All right.

18 Q. What use -- when did you first know about
19 Exhibit 1? And I don't mean the number Exhibit 1, but
20 what it represents. When did you first know about the
21 May 2000 story?

22 A. When did I know about it?

23 Q. Uh-huh.

24 A. Probably when it came out.

25 Q. Did you make any use of it at the time it

1 came out?

2 MR. RICHARDSON: What exhibit number was
3 that yesterday?

4 THE WITNESS: No. 1

5 MR. JOHNSON: 1.

6 MR. RICHARDSON: 1.

7 MR. JOHNSON: I'm just going to go through

8 --

9 THE WITNESS: I don't think so.

10 BY MR. JOHNSON:

11 Q. Okay. What relation does it have to the
12 claims that you're making against the seminary in the
13 lawsuit?

14 A. Well, maybe I should read it because I don't
15 even know that I've even seen it.

16 Q. Then certainly take that time.

17 A. Well, all I know is that these would have --
18 this was the revision of the Baptist Faith and Message
19 and back to the drawing up of the Baptist Faith and
20 Message of 2000 reflecting the changes that were made,
21 whatever.

22 Q. Okay. When did -- when did you first know
23 about Plaintiff's Exhibit 2 and do you make any use of it
24 other than that's the month you were elected to the
25 faculty?

1 A. I just saw these when you produced them, so a
2 lot of this kind of stuff I would have never been a party
3 to or received them.

4 Q. The same question for Exhibit 3.

5 A. That's correct.

6 Q. Same answer?

7 A. Yeah, same answer.

8 Q. Your Exhibit No. 4 from yesterday.

9 A. Well, we had copies of this around the
10 seminary and, of course, I had to respond to each point
11 in my application and faculty questionnaire.

12 Q. When did you first know of Exhibit 5?

13 A. When you provided it.

14 Q. Okay. What use have you personally made of
15 it?

16 A. I've looked at it to see what goes -- you
17 know, see what he said.

18 Q. And do you disagree with any of what he says?
19 I know you disagree with his interpretation of the
20 scripture and application to the Baptist Faith and
21 Message, but any of the factual statements?

22 MR. RICHARDSON: Are you wanting her to
23 take the time to read through all that to see if she
24 disagrees with any of the facts?

25 MR JOHNSON: I'm giving her that time

1 right now.

2 MR. RICHARDSON: It will take awhile.

3 Take your time, Dr. Klouda.

4 THE WITNESS: Thank you. Well, at least
5 with the section eighteen I would like to comment that
6 where it says that with our first meeting Dr. Patterson
7 did not give me assurance of future employment, neither
8 did he tell me that my employment was in any way
9 jeopardized.

10 BY MR. JOHNSON:

11 Q. Okay.

12 A. This number nineteen, the decision to
13 continue, not to continue me in tenure track service was
14 theologically determined and yet my election to the
15 faculty was also based on theological and scriptural
16 support.

17 Q. Okay.

18 A. While it suggests that this has brought the
19 seminary back in line with where it had been from its
20 inception. You know, back in line from -- from when
21 because we had -- I was teaching in 2000, there were
22 other women that were teaching, so it wasn't like this
23 was just a new thing that had just started.

24 Q. I understand.

25 A. Dr. Wolfe was the first one who communicated

1 to me that there was a problem. That would be point
2 twenty-one. There were no guidelines -- no determinant
3 time that I was told I had to leave or at the -- at the
4 August 18th meeting with Dr. Patterson, he didn't --
5 there was no -- I didn't realize that there were any
6 limitations or anything such as that with regard to how
7 long I could stay there.

8 I agree that he did not say that I was a
9 mistake that the trustees needed to fix, that Paul Wolfe
10 said that. But I -- his argument does claim to be that
11 I'm not fit to teach at Southwestern and not fit to teach
12 men. I do think it's important to note that this whole
13 reference to ecclesiastical concern -- I mean my
14 understanding always never had anything to do with
15 gender, but always had to do with if you morally did
16 something wrong like adultery, these kinds of things had
17 to do with behavior or if you taught contrary to the
18 Baptist Faith and Message and in no way did that ever --
19 did that ever say to me that gender was going -- it was
20 under the auspices of ecclesiastical concern. I guess
21 that's it.

22 Q. What was the basis of the limitations when
23 you were elected?

24 A. What's the basis?

25 Q. Yeah.

1 A. To appease the --

2 Q. Huh?

3 A. To appease the trustees.

4 Q. Yeah, what -- was that based on biblical

5 concerns?

6 A. I don't know. I don't know. I wasn't party

7 to their communications, but it was a minority, I know

8 that.

9 Q. It was a what?

10 A. A minority.

11 Q. But you understand that that was an issue

12 that the trustees were dealing at the time, a matter of

13 ecclesiastical concern being the interpretation of the

14 bible and how that relates to teaching and being a --

15 A. I can't know what the trustees were thinking.

16 Q. But you understand that's the issue?

17 A. It could be their personal opinion because

18 there's a wide range of understandings of that scripture

19 in the Southern Baptist Convention and among Southern

20 Baptists.

21 Q. But you've learned that's the issue they had

22 at the time as trustees?

23 A. I can't know for sure.

24 Q. But you've heard that?

25 A. Or read it somewhere.

1 Q. Do you have any other basis to say that's not
2 what they were struggling with?

3 A. No, because I can't know one way or the
4 other.

5 MR. JOHNSON: I think we're off the record
6 because of the tape.

7 THE VIDEOGRAPHER: We're off the video
8 record, the time is 12:49.

9 (Break in the deposition.)

10 THE VIDEOGRAPHER: We're on the video
11 record, the time is 1:33.

12 BY MR. JOHNSON:

13 Q. All right, we've had a lunch break and I have
14 a few more questions and then Mr. Sharpe will ask you
15 some questions.

16 You mentioned some other ladies -- female
17 professors who had taught in the School of Theology.
18 Have you talked with any of them regarding your claims?

19 A. No.

20 Q. Did you talk with any of them about any terms
21 or conditions of employment?

22 A. No.

23 Q. When you went to Taylor University were they
24 aware of your intentions to file a lawsuit?

25 A. No.

1 Q. Were they aware that you had or were going to
2 file an EEOC claim?

3 A. No.

4 Q. Do they know now?

5 A. Yes.

6 Q. Have you -- do they have a chapel service
7 there?

8 A. Yes.

9 Q. And is it like a miniature church service?

10 A. Sort of.

11 Q. And have you spoken at chapel?

12 A. Yes.

13 Q. Have you preached at chapel?

14 A. No.

15 Q. What did you talk on?

16 A. Psalm 103. Psalm 103.

17 Q. Okay. Was it your interpretation of it?

18 A. We just went through the biblical text.

19 Q. And that's certainly within the understanding
20 of what's allowed within the belief system of Taylor
21 University?

22 A. Yes.

23 Q. Would it be -- when you were at the seminary
24 and your understanding of the scripture and your
25 understanding of the Baptist Faith and Message, would it

1 have been contrary to the Baptist Faith and Message and
2 the scriptures for a female to teach preaching in the
3 School of Theology?

4 A. I think so, yes.

5 Q. What is your understanding of how in 2002, if
6 there were limitations placed on what you would teach and
7 not going to teach or how you were going to do something
8 or not related to your beginning to be elected faculty,
9 what's your understanding of how those came about?

10 A. Rephrase, please.

11 Q. What's your understanding of how the
12 limitations came about in 2002?

13 A. That there were a couple of trustees who had
14 some reservations about my election, and so based on
15 these limitations or parameters that satisfied their
16 concerns.

17 Q. And what were their -- the basis of their
18 concerns?

19 A. I don't know exactly.

20 Q. Don't know one way or the other?

21 A. No.

22 Q. What is your attorney fee agreement with your
23 lawyers?

24 A. Well, they would get half of anything if I
25 had a positive outcome, I guess.

1 Q. Is it reduced to writing?

2 A. Yes.

3 Q. I'm going to show you what was marked as
4 Exhibit 6 from yesterday. Have you seen that before or
5 when did you first see it prior to it being marked as an
6 exhibit?

7 A. I have never seen it.

8 Q. Did you make any use of it?

9 A. No, because I've never seen it.

10 Q. Okay. The same question for No. 7?

11 A. The first time I saw this my mom showed me a
12 copy of it while I have been here, so --

13 Q. Did you make any use of it?

14 A. No.

15 MR. RICHARDSON: Roland, as you ask her,
16 would you remind us what the document is?

17 MR. JOHNSON: Sure. That was Plaintiff's
18 Exhibit 7.

19 MR. RICHARDSON: And what is it, though?

20 MR. JOHNSON: Oh, that is --

21 MR. RICHARDSON: An article?

22 MR. JOHNSON: Gary -- yes, an article
23 written by Gary Ledbetter.

24 MR. RICHARDSON: Okay, thank you.

25 MR. JOHNSON: Yes.

1 BY MR. JOHNSON:

2 Q. When did you first read the faculty manual or
3 handbook?

4 A. I read portions of it upon receiving it
5 immediately, other portions I didn't read right away.
6 There's a lot of things in there that are peripheral.

7 Q. When did you read the portions about the
8 terms or conditions of employment at the seminary?

9 A. Probably in the beginning.

10 Q. Have you ever had questions about those
11 sections while you were employed at the seminary? Did
12 you talk to anyone about those sections?

13 A. I did not, but I didn't know that -- I didn't
14 see any concern in those sections.

15 Q. I'm just -- once you got it, it was provided
16 to you early on?

17 A. Right.

18 Q. You read it early on, but you didn't have to
19 talk to anybody later --

20 A. No.

21 Q. -- about it? Is that --

22 A. I thought I understood, but apparently I did
23 not.

24 Q. What is Exhibit 8?

25 A. That is the list of faculty rank with regard

1 to what you're elected at and then what appointed faculty
2 and so forth. It just talks about the assistant
3 professors, policies and such as that.

4 Q. I notice that it began on page twenty-nine
5 and I think went into the -- the last page may be in the
6 fifty-three or fifty-four. Fifty-three?

7 A. Uh-huh.

8 Q. Do you know what -- whether any of the other
9 provisions of the faculty manual concern your claims?

10 A. I don't know.

11 Q. Other than those pages?

12 A. I don't know.

13 Q. I show --

14 A. I don't think, but I don't know.

15 Q. Okay. I'm going to show you what's -- but
16 you do have a complete copy of the faculty manual?

17 A. I had at some point, yes.

18 Q. Do you still maintain those?

19 A. If I have it, it's in a box someplace and I'm
20 not sure where it would be.

21 Q. I'm going to show you what's Plaintiff's
22 Exhibit 9, which says it's a SNAP letter.

23 A. Uh-huh.

24 Q. When did you first see this?

25 A. I -- I might have seen it on-line some place

1 or saw something on-line about it. I think that's
2 probably where I saw it first.

3 Q. Have you talked with anyone from the
4 organization?

5 A. No.

6 Q. With the acronym SNAP?

7 A. No, I have not.

8 Q. Were you trying to make use of SNAP's
9 organization and their efforts as a part of your lawsuit?

10 A. No, never heard of them, really, before this.
11 I didn't know of them.

12 Q. I'm going to show you what's been marked as
13 Plaintiff's Exhibit 10, which is a Dallas Morning News
14 article from 2003. When did you -- when were you first
15 aware of that?

16 A. Can I ask you a question?

17 Q. Yeah, if you need a clarification.

18 A. Yeah, was this at the -- was this at the
19 press conference? Because otherwise I haven't read every
20 article when he was elected. I don't know which ones
21 I've read and which ones I haven't.

22 Q. I don't know the answer to that.

23 A. Okay.

24 Q. I'm just going it was used yesterday by your
25 attorneys as Exhibit 10 and wondering if you had seen it

1 before?

2 A. I was there at the press corporation, so
3 maybe. It says after his hiring Tuesday, so maybe I
4 heard some of this probably directly at some point.

5 Q. Okay. Do you remember anything that happened
6 or was said at that press conference that relates to your
7 claims against the seminary?

8 A. The only thing I can think of that has any
9 relationship is his remark with regard to how he
10 understood women teaching on the school -- on the -- at
11 the -- in the School of Theology and his commitment to
12 hiring guys -- you know, God-called men to those
13 positions subsequent to his taking on the presidency.

14 Q. And when did you hear that?

15 A. At the press conference.

16 Q. At or about the time of his being elected?

17 A. The day of his election.

18 Q. To the presidency?

19 A. Yes.

20 Q. I'm going to show you what was marked
21 yesterday as Plaintiff's Exhibit 12. It's a Baptist
22 Press 2004 article. When did you first see that?

23 A. I can't tell you. I've seen it sometime, but
24 I don't know when.

25 Q. Have you made any use of it with your claims

1 in this lawsuit that you know of?

2 A. Not that I know of.

3 Q. I'm going to show you what's Plaintiff's
4 Exhibit 11. I skipped it. It's an article that says May
5 of 2007, SBC Leader, that was talked about yesterday.

6 A. It was -- something similar to it was on-line
7 some place, so I saw something on-line around this time.

8 Q. Okay. Did you make any use of it related to
9 your claims in this lawsuit?

10 A. Not that I know of.

11 Q. I show you what's been marked as Plaintiff's
12 Exhibit 13 from yesterday. It looks like a Dallas
13 Morning News article dated January 19th, 2007. When did
14 you know about that article or interview or news story?

15 A. When I was interviewed by this person.

16 Q. That's one in which they talked to you for
17 part of it?

18 A. Yes.

19 Q. And why did you choose to --

20 MR. RICHARDSON: You need to say yes. I
21 don't think he got your answer.

22 MR. JOHNSON: Oh, I thought I --

23 THE WITNESS: Yes.

24 BY MR. JOHNSON:

25 Q. I'm sorry. Why did you choose to be

1 interviewed by the Dallas Morning News?

2 A. Well, in part because this was already made
3 known through Mr. Burleson -- or Paston Burleson's blog,
4 so I didn't feel that there was any need to be quiet
5 about it and in some ways I thought it might be helpful
6 in expressing some perspective on it.

7 Q. Did you give permission to the Dallas Morning
8 News to quote you?

9 A. Yes.

10 Q. Did you ever meet with them again about any
11 of the issues that were raised in the 2007 time period?

12 A. Well, --

13 Q. January of 2007 time period.

14 A. I -- I don't remember specifically. I don't
15 think so, but I don't know for sure. As I say, there was
16 a lot of media attention for a few weeks.

17 Q. I'm going to show you what yesterday was
18 marked as Plaintiff's Exhibit 14, which is an e-mail from
19 Wade Burleson to Dr. Patterson. Had you seen or heard
20 about that communication before?

21 A. No.

22 Q. Do you support Wade Burleson in any of his
23 efforts in reporting and blogging on the issue related to
24 this lawsuit and the claims and defenses in the lawsuit?

25 A. I don't do anything like that, no.

1 Q. Page -- Plaintiff's Exhibit 15 from
2 yesterday, when did you first know or see that? I don't
3 see a date on there.

4 A. Neither do I see a source, so I have no idea.

5 Q. Okay. Had you seen it before because it --

6 A. I think I have.

7 Q. -- has a photograph.

8 A. I think I -- well, yeah, this is the
9 photograph that was widely circulated when I was elected
10 to faculty, so I mean that's the photograph.

11 Q. Okay.

12 A. So they just took that off there because that
13 was widely publicized.

14 Q. Have you read Plaintiff's Exhibit 15 before?

15 A. I think I have. It sounds familiar. I just
16 don't know where it's from.

17 Q. When -- do I understand that you have a
18 practice of checking on what the media and bloggers are
19 saying about this lawsuit?

20 A. Not overly much, no.

21 Q. What is your practice?

22 A. Well, once in awhile my mom perhaps might
23 notice something on the internet and she'll say, "Have
24 you seen something or another?" Generally that's it or
25 somebody will make some kind of reference to something.

1 So there are a lot of things going on on the internet
2 that I don't actually see or I see a long time after it's
3 ever been there.

4 Q. Okay. Are there any persons other than your
5 attorneys that are spokesperson for you in the media?

6 A. I do not believe so.

7 Q. Have you given anybody permission to
8 represent you in the media?

9 A. No.

10 Q. Other than the folks that we've talked about
11 today -- and you can tell I'm about finished, but I want
12 to ask kind of some over -- broader questions. Other
13 than the people we've talked about today, do you recall
14 teaching -- I mean talking with or meeting with any other
15 persons that you claim were representatives or a part of
16 the seminary about your hiring or the terms and
17 conditions of your employment?

18 A. No.

19 Q. Do you recall talking to anyone outside of
20 the seminary about those same subject matters other than
21 the people we've talked about today?

22 A. Media.

23 Q. Okay.

24 A. We probably haven't mentioned all of them.

25 Q. Okay. Do any -- do any of your meetings with

1 the media come to mind?

2 A. We've mentioned some of them. Some of them
3 were just phone conversations, some were not much.

4 Q. And do I understand correctly that you've
5 come to a point that you are willingly talking to the
6 media and answering their questions about this
7 litigation?

8 A. Only -- well, at this point I'm probably not
9 and -- I haven't talked to anybody for awhile and
10 probably not talking to anybody at this point or
11 recently.

12 Q. The same -- same question for people that not
13 maybe don't have media credentials, but who are on the
14 internet as bloggers?

15 A. That's correct.

16 Q. One purpose of a -- of a deposition like
17 today is to learn the facts that form the basis of your
18 claim against the seminary and that's one of the jobs I
19 perform...is evaluating things. Do you know of any other
20 facts that are important to you that I know that form the
21 basis of your claims against the seminary?

22 A. Well, the only things that I can think of at
23 this point is that those that were hired at the same time
24 as I and those that are male have the benefit in general
25 of receiving a full consideration for tenure whether or

1 not they're given tenure. And that for some reason, just
2 simply on the basis of my gender, I've been in some way
3 slighted and I don't think that that's treating me
4 equally with other people who are on the same path and
5 doing the same sorts of things. So I feel like I've been
6 treated unfairly in terms of my gender because I didn't
7 receive the same treatment as the male professors that
8 had been hired at the same time as I was and that's --
9 that's really -- I mean that's the gist of it.

10 Q. Anything else?

11 A. Nothing else that comes to mind.

12 Q. Out of those people that were hired at the
13 same time you were elected to faculty, how many of them
14 are still there?

15 A. I only know of one other that departed and he
16 did so with difference in belief with the seminary and he
17 did so willingly.

18 Q. You understand that the genesis of the
19 thought process about whether or not professors in the
20 School of Theology that teach people who are going to be
21 pastors -- the genesis of that is within the text of the
22 bible and the Baptist Faith and Message?

23 A. In the local -- well, no.

24 Q. Okay. You do not believe that those -- let
25 me go at it this way. Those that believe that the

1 professors in the School of Theology at the seminary who
2 teach future pastors of the convention, they -- that
3 those that believe that since the pastors are going to be
4 men, that those that teach those pastors in the School of
5 Theology need to be pastor-qualified, that the basis of
6 that belief finds itself in the bible text that we've
7 discussed yesterday and today?

8 A. That is their view on that particular
9 passage.

10 Q. You don't agree with their view?

11 A. I do not agree, but I'm also not in the
12 minority. There are others. It's not like everybody
13 agrees.

14 Q. I understand. I'm not asking you if you
15 agree with their interpretation of the bible, but you are
16 able to understand the genesis -- the beginning of that
17 process is an interpretation of the biblical text?

18 A. I get the sense of that; however, still I
19 will still restate that not all students in my classes
20 are pastors or going to be pastors or even striving to be
21 pastors. As time went on I would -- maybe not even half
22 of my class would be or, you know, maybe only a third.
23 And so there may have been ways in which this could have
24 been worked out.

25 Q. And the classes about Hebrew I and II and the

1 exegesis classes that we talked about, those are
2 entry-level required courses for the MDF program at the
3 seminary?

4 A. They are now. They didn't use to be.

5 Q. Okay. When did they become required?

6 A. Over the time that I was there.

7 Q. That is a change that occurred?

8 A. Yes, it's -- that originally when I was first
9 teaching as teaching fellow, I believe that only one
10 semester of Hebrew was required and then there was a
11 track where you didn't have to take any languages, you
12 just had to take a language appreciation course over the
13 time that I was there. Then a full year came into view
14 and then that third semester of exegetical method became
15 a requirement, but that was over a period of time.

16 Q. When -- when did it get to that third
17 semester?

18 A. I would say probably at some point in 2003.

19 Q. Other changes between the time you were hired
20 and the time you left, was the board of trustees changed?

21 A. I know some of them changed. I don't know
22 how many or who.

23 Q. You understand that the Southern Baptist
24 Convention appoints trustees to the board of trustees at
25 the seminary?

1 A. I think that's what I've heard.

2 Q. Are there any -- are there any changes to any
3 of the questions you need to make to any of the questions
4 I've asked -- any changes to your answers to the
5 questions I've asked of you today that you know of while
6 you're here?

7 A. Not that I can think of.

8 MR. JOHNSON: Thank you. Thank you for
9 your time today.

10 THE WITNESS: Thank you.

11 MR. JOHNSON: I think Mr. Sharpe is going
12 to ask you some questions. We have to change seats.

13 BY MR. SHARPE:

14 Q. I represent to you that I'm Shelby Sharpe and
15 that I am Dr. Patterson's attorney. Do you understand
16 that, please, ma'am?

17 A. Yes.

18 Q. Okay. The decision that you made to bring
19 suit, approximately how long had you been gone from the
20 seminary before you finally came to that persuasion to do
21 that?

22 A. Maybe five to six months.

23 Q. Okay. Did you and Dr. Wolfe have a
24 conversation -- once you learned about the decision
25 concerning your employment in that particular position,

1 did you have a conversation with him where he indicated
2 to you that he thought you were contemplating suit before
3 you ever left the seminary? Do you recall a conversation
4 of that nature?

5 A. I do. All I said to him was that I was
6 receiving pressure from my parents, but that was all.

7 Q. Okay. Did you --

8 A. I wasn't contemplating suit at that time. I
9 had no -- because I didn't think that I -- I had any suit
10 because I didn't think that there was a problem yet.

11 Q. Okay. Did he tell you that if you were going
12 to do that, that he would not be able to consult with you
13 concerning --

14 A. Oh, sure.

15 Q. So he did tell you that?

16 A. He did say that, yes.

17 Q. Okay. All right. After you left the
18 seminary, who all did you consult with before you talked
19 to an attorney about filing suit? You mentioned your
20 parents.

21 A. My parents were constantly insistent upon it,
22 you know, and kept pushing -- kept pursuing the matter.

23 Q. Okay.

24 A. My husband, of course, we had conversations.
25 My daughter, we've had conversations. Those are the

1 primary people that I really had much discussion with. I
2 did say that I talked to Wade Burleson that time when he
3 called me and I told him -- he asked the question and I
4 explained what happened to me, but he neither encouraged
5 or did anything to persuade me. It was a decision I came
6 to of my own accord.

7 Q. Did he recommend that you seriously consider
8 suit?

9 A. I think that he has expressed publicly that
10 he was glad that I did, but I don't believe that he
11 personally encouraged me to do so.

12 Q. When you first met your lead counsel, Mr.
13 Richards (sic), how was it that you came to know of him?

14 A. I heard of him.

15 Q. Okay. And where did you hear of him?

16 A. He had originally run for governor.

17 Q. Okay.

18 A. In Oklahoma and I heard of him -- oh, geez,
19 let's see. I think that was -- it was somewhere in all
20 of the -- in all of the on-line stuff that I got that
21 information when I was first --- when this news first
22 broke and there were all of the media things, I did look
23 on-line a lot to read what was being written.

24 Q. Did you --

25 A. And I must have -- I must have in one of

1 those writings saw him mentioned there. I'm quite sure
2 that's the case.

3 Q. Now when you say on-line stuff, be more
4 specific.

5 A. Well, like -- like as media things, as
6 newspaper articles, BP Press and different ones came out
7 with articles with regard to my dismissal from
8 Southwestern, I would search on-line occasionally and see
9 what they were saying, you know, or if it was somebody
10 with whom I had interviewed. And I just put my name in
11 or whatever, you know, all those things come up.

12 Q. Did you find his name mentioned in any of
13 those articles?

14 A. I think they were, but I couldn't tell you
15 which one -- or not they were. I'm sure I saw it in at
16 least one and that's what gave me the idea.

17 Q. Okay. Do you recall how his name happened to
18 come up in the article?

19 A. No, I don't.

20 Q. Okay. Do you know whether or not Wade
21 Burleson knows your lead counsel?

22 A. I think he does and I think he said so on his
23 blog.

24 Q. Okay. And you say that you saw in articles
25 in conjunction with your situation a mention of your lead

1 counsel?

2 A. That's correct.

3 Q. And had anybody talked to you about who you
4 might retain as counsel?

5 A. Well, not really. It was really an
6 independent decision.

7 Q. Okay. Do you have any idea why his name was
8 mentioned in those articles in conjunction with -- with
9 your situation?

10 A. No, I don't remember.

11 Q. Okay. Did anybody recommend that you contact
12 him?

13 A. No.

14 Q. Okay. And how was it that you found out how
15 to get in contact with him?

16 A. Well, I went on-line.

17 Q. Okay. And you found that information
18 on-line?

19 A. Yes.

20 Q. You have stated that it was represented to
21 you when you were being considered for election that if
22 you did certain things, you would stay on a tenure track
23 and that you would have employment for -- as you said
24 earlier, at least for the period of time of the tenure
25 track. Did I repeat that accurately?

1 A. I expected to be treated like all the other
2 faculty members that were elected to tenure track, yes.

3 Q. Okay. Now I want to be sure that we have
4 named everyone who on behalf of the seminary has made any
5 representation to you concerning election to tenure track
6 and what that included. So I know you've named Dr.
7 Blaising.

8 A. Yes.

9 Q. And I know you've also mentioned that you had
10 some conversation with Dr. Wolfe.

11 A. Yes.

12 Q. Who, other than those two, spoke to you about
13 any representation concerning being elected to tenure
14 track and what that included and being on tenure track?
15 Is there anybody other than those two people on behalf of
16 the seminary that have talked to you about that before
17 you were elected?

18 A. I don't think so. I don't think so.

19 Q. So whatever representations were made to you
20 about tenure track and your allegations concerning that
21 would have either been made by Dr. Blaising or Dr. Wolfe
22 from the standpoint of representatives of the seminary
23 from a human perspective. Am I correct there?

24 A. I think that's correct.

25 Q. And so anything else you knew about tenure

1 track would have been in the faculty manual primarily.

2 Is that correct?

3 A. Primarily, yes.

4 Q. And beyond the faculty manual, is there any
5 other document that you can think of that you might have
6 relied upon or looked at before you were elected to
7 tenure track other than faculty manual?

8 A. No.

9 Q. And isn't it true that Dr. Blaising is the
10 one who caused a faculty manual to be sent to you before
11 you were elected so you would at least be able to look at
12 it and know what you were being elected to. Is that
13 true?

14 A. That's true.

15 Q. Okay. Now you have mentioned that you were
16 elected to the faculty along with some other people. Is
17 that correct?

18 A. Yes.

19 Q. Was there anything different about your
20 election to the faculty from the rest of those who were
21 elected with you at the same time?

22 A. Well, in the School of Theology there was
23 another -- well, there was another gal. She wasn't the
24 School of Theology, I believe she was the School of
25 Education.

1 Q. Okay.

2 A. And then the other -- the other five were
3 gentlemen and they were elected to the School of
4 Theology, but they did not have any parameters under
5 which -- or limitations of the scope of what they
6 necessarily would teach.

7 Q. Now is it true that all of these were elected
8 to a tenure track?

9 A. That's my understanding, yes.

10 Q. Okay. Now is there anything about your
11 election to a tenure track that was different from these
12 others other than the particular schools?

13 A. As far as I know, not.

14 Q. Okay. So whatever the principles that would
15 be applying to the tenure track regardless of which
16 school, yours would be no different than everybody else's
17 --

18 A. That's what I was hoping, yes.

19 Q. Okay, very good.

20 So you're not claiming that there was some
21 type of special treatment in your election as a part from
22 the others who were elected at the same time. Is that
23 correct?

24 A. Other than there were certain parameters and
25 limitations placed on my teaching responsibilities.

1 Q. Did that --

2 A. But I think -- I'm not sure whether that
3 occurred before the election, but I'm almost sure it
4 occurred after the election. I'm not sure.

5 Q. Okay.

6 A. Which one.

7 Q. So other than the restrictions on your
8 teaching responsibilities, you're not claiming that
9 there's anything different about your being elected to
10 tenure track from all of the other people?

11 A. That's correct.

12 Q. Okay, very good. Thank you.

13 Now do you believe that those restrictions on
14 your teaching responsibilities were just some weird
15 people on the board saying, you know, "We just don't like
16 this" or do you think they may have had a theological
17 concern that caused them to address that?

18 A. I am sure that they were sincere in whatever
19 their motives or thoughts were, but I don't have any way
20 of knowing what those were because nobody conveyed that
21 to me.

22 Q. Okay. Now how many women have been in the
23 faculty of the School of Theology from the inception of
24 the seminary up to the point where you were elected?
25 Approximately how many women would you say were --

1 A. Elected?

2 Q. -- elected to that faculty?

3 A. Elected faculty, as far as I know, only Karen
4 Bullock and myself.

5 Q. Okay. Do you think that this was just a
6 feminist bias that no women would elected to the faculty
7 up until that point?

8 A. No, I think that -- I think that it
9 represented -- that the election of women to the faculty
10 was representing cultural change.

11 Q. Do you believe that it was theologically
12 based as to why the seminary up until the point that you
13 said that only men were elected to that, do you think
14 there was a theological basis for that decision?

15 A. I think that there may have been a specific
16 perspective, but I don't know for sure exactly what the
17 basis for that was. I know that previous to my election
18 I was teaching there and it seemed to be all right with
19 folks. If it weren't all right, I would have thought
20 somebody would have said something and done something
21 about it.

22 Q. Okay.

23 A. And so I was under the assumption that it was
24 all right and within the accepted -- acceptable to the
25 trustees and to those in administration and authority

1 because nobody ever challenged it or put a stop to it or
2 in any way made it out to be wrong in some way or against
3 some principle of the school or any theological teaching
4 or anything.

5 Q. Would you agree with me that until about the
6 last couple of decades, women teaching in the School of
7 Theology in Southern Baptist life were nonexistent?
8 Would you agree with that?

9 A. I don't know. I don't know that part of
10 Southern Baptist history.

11 Q. Have you ever looked at the history of
12 Southwestern Baptist Theological Seminary?

13 A. Probably from afar.

14 Q. From afar? Are you --

15 A. In the scope of Baptist history in general.
16 Okay, as one group of Baptists.

17 Q. Are you aware of women being involved in the
18 administration or the teaching from inception of the
19 seminary -- let's say -- just pick an arbitrary date up
20 to 1960, are you aware of any women involved in it?

21 A. I wasn't born, I don't --

22 Q. I'm talking about your knowledge of history.

23 A. My knowledge of history, I don't know.

24 Q. Okay. Now since you've been involved at the
25 seminary and you are familiar that there are other

1 Southern Baptist seminaries, are you not?

2 A. Yes.

3 Q. In fact, Southwestern is only one of six.

4 Isn't that correct?

5 A. Yes.

6 Q. And how many women are you aware of that are
7 teaching on the faculty of the School of Theology in
8 other Southern Baptist seminaries?

9 A. Currently, I don't know.

10 Q. Okay. Back when you were teaching at
11 Southwestern Seminary?

12 A. I don't know. It never -- it never was an
13 issue. I never saw it as being an issue. I never took
14 stock of how many there were or -- I was busy teaching.
15 I was doing my job and so I don't amass information like
16 this. I had no reason to, had no thought to, had no
17 concern to.

18 Q. Let me ask you this. Would it surprise you
19 if you learned that until just a few decades back, there
20 were no women teaching in the School of Theology at
21 Southwestern or any of the other Southern Baptist
22 seminaries? Would that surprise you?

23 A. Not from a cultural standpoint, it wouldn't.

24 Q. And so you believe then that it was a
25 cultural thing, not a biblical theological thing that was

1 causing that to happen. Is that your position?

2 A. I think that that -- that it's culturally
3 driven, yes.

4 Q. Okay. Now you testified earlier that you are
5 a biblical inerrantist. Is that correct?

6 A. That's correct.

7 Q. And you hold to that position, you've
8 affirmed that? In fact you've even signed the Baptist
9 Faith and Message, which I think that's part of that. Is
10 that correct?

11 A. That's correct.

12 Q. Okay. Now how much does the bible change in
13 its teachings by culture?

14 A. Well, the culture of the bible is, of course,
15 far removed by thousands of years from our culture.

16 Q. That's correct.

17 A. And so there are changes in culture from that
18 in the historical and literal setting of a particular
19 passage and then today.

20 Q. My question -- and maybe I didn't phrase it
21 real good, so let me take another run at it. How often
22 is it that culture changes the teachings that are set
23 forth in the Old and New Testament?

24 A. It's not a matter of change, it's a matter of
25 perspective.

1 Q. Okay. Would there be a cultural change to
2 where that the Trinity would no longer --

3 A. No.

4 Q. -- would considered to be --

5 A. It's not --

6 Q. -- a part of the bible?

7 A. No.

8 Q. Would there be a cultural change to where
9 that it's not the father, it's the mother and the
10 daughter and the holy daughterist or whatever?

11 A. No.

12 Q. Is that subject to a cultural change?

13 A. No, that's a theological nonnegotiable.

14 Q. Okay. What about Paul's requirements for an
15 elder and overseer?

16 A. I see no problem with that.

17 Q. I mean are those subject to a cultural
18 change?

19 A. No, but they don't take into consideration a
20 culture that's far removed from them in terms of new
21 situations that have presented themselves to us.

22 Q. But we do know that there are certain
23 denominations, though, that are looking at the same bible
24 and they do interpret those differently, which the
25 culture says, "Hey, it's fine to have a woman pastor. It

1 is fine to have a woman teaching, preaching", which
2 Southern Baptist life does not do, but, for example, the
3 Methodist, say, "Hey, that's fine." Would you agree with
4 that?

5 A. I think there are denominations that look at
6 those -- look at it from that perspective, yes.

7 Q. Okay. So now back to the question that I
8 had. Do you think that the reason that Southwestern was
9 formed as it was and those who were teaching there and
10 those who were in the administration, do you think that
11 was culturally driven or do you think that was driven
12 based upon an understanding of the scriptures and
13 particularly the passages that Dr. Patterson mentioned
14 yesterday?

15 A. I have no way of knowing for sure.

16 Q. Okay. All right. So you're not very
17 familiar with Southern Baptist church history. Is that
18 correct?

19 A. Well, I'm familiar with Southern Baptist
20 church history only inasmuch as I'm familiar with other
21 Baptist history. You know, overall general Baptist
22 course -- Baptist history course that I took many, many
23 years ago.

24 Q. Do you think if you're going to be a
25 professor in a Southern Baptist seminary, it would really

1 be good to be familiar with the history of the
2 institution in which you're teaching?

3 A. It really would be.

4 Q. Do you think it would be good?

5 A. It would be, yes.

6 Q. Okay. But you did not take the time to
7 really study that history. Is that correct?

8 A. I don't think I would put it that way.

9 Q. Okay. Well, then let me ask --

10 A. I -- especially now in the last couple of
11 years I've become much more interested in history and I
12 am working on shoring those things up and that certainly
13 would be one thing in which I would be better versed.
14 But given various situations at different time periods in
15 life, there are sometimes things that take priority. You
16 know, being a mother, for example, and taking care of the
17 family and taking care of the financial, physical needs
18 and all those things play a role and have priorities and
19 so that wasn't the top priority at that time.

20 Q. Why do you think there was so much media
21 attention given to your election to the faculty of the
22 School of Theology?

23 A. Because it seemed unique or unusual.

24 Q. Why was it unique or unusual, in your
25 opinion?

1 A. I guess -- I would guess that it didn't
2 follow the norm when it came to Southwestern's elections
3 with regard to who they -- who they would elect.

4 Q. And what do you mean by follow the norm?
5 What was the norm, as you understood it?

6 A. That normally it would -- it would have been
7 males that would have been elected to positions in the
8 School of Theology.

9 Q. Why do you think that was the norm?

10 A. I don't know.

11 Q. Do you think that maybe has had something to
12 do with the theology and -- of the school and the
13 understanding of the trustees as to what their
14 stewardship was of that theology?

15 A. It's really hard for me to say because at
16 least my -- from what I'm able to understand from the
17 various professors that worked there, that they did not
18 view a woman teaching in the School of Theology as a
19 problem or as contradictory to -- and I'm not saying all.
20 I'm saying many of those that I encountered did not find
21 it contradictory to the Baptist Faith and Message
22 statement that we're referring to. And so I didn't know
23 why it is that women hadn't been elected, but it seemed
24 acceptable to my colleagues and the professors that
25 taught there and they were overwhelming -- seemed to be

1 overwhelmingly welcoming.

2 Q. You have noted that there was media attention
3 given because it was not the norm and so your election
4 was either caused by the fact that there was something
5 very unique about you as a person apart from your gender
6 or it was your gender that was the thing that was
7 attracting the media. Now was there something very
8 unique by way of talent that you brought to the seminary
9 that caused the media -- for example, if Billy Graham in
10 his prime had decided he wanted to see if he could be a
11 part of the Evangelism Department, let's say, twenty
12 years ago, I have a feeling the media would have
13 responded to that. Would you agree with that?

14 MS. MERICA: Objection, form.

15 THE WITNESS: I would say there were two
16 women elected. There was also another woman elected and
17 I think that was the two women elected at the same time
18 that may have caused more of the attention because they
19 obviously interviewed Dr. Stovall.

20 BY MR. SHARPE:

21 Q. Okay.

22 A. For the media and so it was -- it was more
23 than just my election.

24 Q. Okay.

25 A. It was probably the election of two women.

1 Q. All right. So -- but you think it was the
2 election of two women that focused it probably more than
3 just something extremely unique about what you all would
4 bring to the seminary as teachers?

5 A. I truly don't know because other than those
6 that attempted to contact me at the initial time of the
7 election, I really received no other solicitation from
8 the media. So all this supposed media that was going to
9 pay all this attention to me and ask me questions and
10 that I was supposed to avoid at all costs never -- never
11 materialized.

12 Q. Okay. So here we have a situation that is
13 not the norm and then two women are elected at a
14 particular time and there's a lot of news attention to
15 that, that would indicate that what has gone on in the
16 past and what may be going on at other Southern Baptist
17 Seminaries, that this is unusual. Would you agree with
18 that?

19 A. Possibly, but, see, you even say a lot of
20 attention and I don't know there was anymore attention
21 necessarily on that other than a little bit. Rather
22 there was always attention focused on whatever the
23 results of the trustees' meetings were at Southwestern
24 for the local news and such, so that was always news. It
25 wasn't as if that was never reported. And I don't -- I

1 really differ with the whole notion of a lot of attention
2 because I don't think there was really a lot of
3 attention.

4 Q. Are you familiar with how much attention
5 there were to previous elections of faculty compared to
6 this and from a media point of view?

7 A. Usually, yes.

8 Q. Okay. And you believe that the media
9 attention to this was no different than the previous
10 ones?

11 A. I think it was slightly -- perhaps slightly
12 more, but not a lot more.

13 Q. Okay. So the difference is in the magnitude?
14 Your -- you would use a lessor degree than what I just
15 described?

16 A. I certainly would.

17 Q. Okay. All right. But the reason that there
18 is at least some degree, you acknowledge, is because of
19 the fact that two women were elected?

20 A. Probably, yes.

21 Q. Okay, very good. Thank you.

22 You went through the allegations of your
23 pleadings earlier and said that there were some
24 allegations in there that were not correct. Did you call
25 those to your attorney's attention since you did amend

1 that pleading three times?

2 A. Well, I thought that I had at least this
3 statement of talking about the mistake that -- you know,
4 that I was a mistake that needed to be -- that the
5 trustees needed to fix.

6 Q. Uh-huh.

7 A. I had thought that I did and I thought that
8 in subsequent documents it did not attribute that to Dr.
9 Patterson specifically, just that that was something that
10 was said to me and it was somewhat demeaning and somewhat
11 derogatory in some ways.

12 Q. Okay.

13 A. Reflected badly on me.

14 Q. Okay. And so you -- you admit that he did
15 not make that statement?

16 A. That's correct.

17 Q. Okay. Are you trying to punish Dr. Patterson
18 by this lawsuit?

19 A. No, I just need justice.

20 Q. Okay.

21 A. I need fairness and justice.

22 Q. Okay. But you're not trying to punish him,
23 though?

24 A. No, I am not.

25 Q. Are you just trying to get what you believe

1 are your economic loss, but not trying to punish him on
2 top of trying to recover your economics? Is that what
3 you're trying to do?

4 MS. MERICA: Objection to form.

5 THE WITNESS: I'm not trying in any way to
6 exert any kind of undue punishment, no.

7 BY MR. SHARPE:

8 Q. Okay.

9 A. I just think that fairness and justice would
10 be the law of the day and it's explicated in scripture.

11 Q. Okay. Now I just want to be sure that the
12 record is clear on one thing. You are not testifying
13 that Dr. Blaising told you that if you got elected to the
14 faculty, that you were going to be able to stay on a
15 tenure track the entire period of time? You're not
16 saying that he said that to you, are you?

17 A. I'm saying that as far as I understood, I was
18 never told that I would be treated any differently than
19 any other faculty member that had been elected to tenure
20 track status.

21 Q. So having said that, you're not here
22 testifying that Dr. Blaising promised you that you would
23 be on a tenure track all the time after your election?

24 A. I'm testifying that I was denied the
25 opportunity to follow through on the tenure track on the

1 basis of something that I didn't -- I have no control
2 over. I mean Dr. Patterson even told me I had no control
3 over the fact that I was a woman on -- in one of his
4 meetings and -- and so -- and so I would think that I was
5 a woman when I was put on tenure track and that that
6 would not summarily -- summarily eliminate me from tenure
7 track down the line as that could never change, at least
8 --

9 Q. Objection, nonresponsive. Listen to my
10 question.

11 Did Dr. Blaising tell you that if you were
12 elected to a tenure track -- and I'm asking you what he
13 told you. I'm only -- I'm asking you to recall his
14 representations to you. That you would stay on that
15 tenure track all the way, did he ever tell you that?

16 A. I don't know that he ever told anybody that.

17 Q. But you don't recall him telling --

18 A. No, I don't.

19 Q. -- you that?

20 A. No, I don't recall him specifically singling
21 out me and singling out that specific thing and telling
22 me.

23 Q. Okay, great.

24 Now did anybody else at the seminary tell you
25 before you were elected, whether it's a trustee or

1 whoever, that was in any position of authority, that if
2 you got elected to a tenure track, you were going to stay
3 on that track all the way? Did anybody ever tell you
4 that?

5 A. No.

6 Q. Thank you, very good.

7 How do you distinguish between a social
8 belief and a theological belief?

9 A. A theological belief is usually a theological
10 nonnegotiable, so, for example, the Trinity that we
11 discussed earlier. When it comes to social belief or it
12 comes to a personal belief, we're talking about something
13 that's not expressly described or explained in scriptures
14 and which each Baptist in his priesthood or her
15 priesthood of the believer understand that passage to the
16 best of their ability through the guidance of the Holy
17 Spirit, so -- so these are things in which for -- there
18 are certain scriptures on which there are held a wide
19 variety of views rather than one specific theological or
20 theological perspective.

21 Q. Are you saying the fact that there are
22 differences of theological opinion on an interpretation
23 of scripture, that one's theological and the other is
24 social if you don't like the -- the opposite view?

25 A. No, what I'm saying is that there -- that it

1 appears that at least when one considers a social belief,
2 that is based on something more than just simply the
3 scriptural -- scripture's view on women or their roles in
4 the local church.

5 Q. So what you've just stated is your
6 distinction between what's a theological belief of a
7 person and what is a sociological belief of a person is
8 based on the fact that they may add something or have
9 ideas other than the scripture to influence that?

10 A. Yes.

11 Q. Is that what you're saying?

12 A. That's what I'm saying.

13 Q. Are you aware of any -- besides what you've
14 just said, where have you ever seen that expressed before
15 in any recognized book?

16 A. I have not.

17 Q. Is that just your own, quote, personal
18 opinion on the difference between a sociological belief
19 and a theological belief?

20 A. A sociological belief is in many ways
21 generated by environment, by culture, by --

22 Q. Okay.

23 A. -- upbringing, by those external
24 circumstances that affect the person and that in fact
25 those things can have an effect on how an individual

1 views a specific passage of scripture, especially those
2 that are not explicit or that don't address a specific
3 question specifically.

4 Q. Okay. Let me ask you to try to clarify your
5 -- what you believe is a sociological belief as opposed
6 to a theological belief because you've said that Dr.
7 Patterson's interpretation of that passage, as he applies
8 it to the faculty of the School of Theology, you're
9 saying that's sociological and not theological because
10 you've just said that?

11 A. Right.

12 Q. Even though he would and has testified that
13 that is not -- it's his theological belief, but let me
14 ask you this. Are you aware of the fact that there are
15 some theologians who believe that there is no basis for
16 divorce, period? Do you know that there are certain
17 theologians that hold that position based on looking at
18 the Mark 10 and the Matthew 19 -- Matthew 5 passages? Do
19 you know that that's true?

20 A. I know a few, yes.

21 Q. Okay. And do you know that there's some
22 theologians who don't hold to that view and believe that
23 there are grounds for which a person can divorce? Are
24 you aware that there --

25 A. Yes.

1 Q. -- are theologians who hold that?

2 A. Yes.

3 Q. Now are both of those theologically based or
4 is one of those based on the fact that the cultures with
5 no-fault divorce and stuff like that, that that's what
6 caused that view?

7 A. It's called having presuppositions and none
8 of us can escape them. When we go to scripture, even
9 though --

10 Q. Okay.

11 A. -- we're striving to go to scripture in as
12 objective perspective as we are able and through the
13 guidance of the Holy Spirit, we all have presuppositions.
14 And you can ask Dr. Wolfe would it be -- is the one who
15 taught me that we all have presuppositions and so we
16 cannot totally eliminate those presuppositions.

17 Q. Taking the fact that every one has
18 presuppositions, we're trying to make a distinction here
19 between that which is a theological opinion and that is
20 which is a sociological opinion. And presuppositions are
21 going to affect both of those and you've already said
22 that, but what is it that makes a theological opinion, in
23 your opinion, based on what I just gave you as where
24 there are two different theological views on divorce, why
25 -- would not both of those be theologically grounded or

1 would one of them, in your opinion, because of the fact
2 that our culture does embrace divorce differently than it
3 did, say, a hundred years ago, is that the reason why
4 that is no longer a theological opinion and has now
5 become a sociological opinion? What is it that you can
6 clearly define where there's a difference of opinion on
7 theological interpretation that causes one to no longer
8 be a theological and is now sociological?

9 A. I don't know how to answer the question.

10 Q. And --

11 A. I'm getting lost in all of this.

12 Q. All right. Then let me try to simplify it.

13 And by the way, you -- you have been a seminary professor
14 for some years. Is that correct?

15 A. Yes, but I teach biblical language.

16 Q. Okay. And --

17 A. And Ugaritic and Aramaic and things that have
18 -- that aren't --

19 Q. And you understand that with respect to
20 teaching languages -- you understand with respect to
21 teaching languages you're supposed to interpret language
22 within a full context and to give words their ordinary
23 and acceptable meaning unless defined otherwise and
24 accepted rules of grammar and word usage are to be
25 applied to that. Would you agree with that?

1 A. I do.

2 Q. Okay. Now if you you have people who
3 theologically look at a passage and they come to a
4 conviction that these divorce passages, there's no basis
5 for divorce, and then some other very well-qualified
6 people look at it and say, yes, there are grounds for
7 divorce, are not both of those theologically based?

8 MS. MERICA: Objection, asked and
9 answered.

10 BY MR. SHARPE:

11 Q. That's yes or no.

12 A. One has to -- I don't know that this is going
13 to answer the question either. One has to take into
14 consideration all of the passages and scriptures that are
15 related to whatever theological conclusion a person is
16 making.

17 Q. That's exactly what I said. We're talking
18 about them looking at all of the passages that relate to
19 that. One concludes from an examination of all of the
20 passages, as you just said, that there is no basis for
21 divorce and the other one concludes, yes, there are, are
22 not both of those theologically based?

23 MS. MERICA: Objection, asked and
24 answered.

25 BY MR. SHARPE:

1 Q. Yes or no?

2 MS. MERICA: And, Dr. Klouda, you are not
3 limited by an instruction to answer the question yes or
4 no.

5 BY MR. SHARPE:

6 Q. That wasn't an instruction.

7 A. I don't know how to answer your question. I
8 just know that I don't believe that a God as big and
9 merciful and as great as ours, as compassionate and so
10 forth, all of his attributes, it just does not seem that
11 he would be the kind of God that would advocate, for
12 example, that all human beings don't have rights. So
13 there are people who would claim that a passage on
14 slavery or a passage on Noah and his sons indicate some
15 need to be prejudiced against folks with a different
16 color skin, I still -- I find that in many ways contrary
17 to what the God that I know would advocate and yet people
18 would claim that that's a theological opinion, but it --
19 perhaps it might be their social view.

20 Q. Objection, nonresponsive.

21 Let me ask the question this way. Do you
22 doubt the sincerity of Dr. Patterson's theological
23 understanding of the 1st Timothy passage?

24 A. With relation to -- with relation to the
25 seminary, I would have to say that if he were -- this was

1 a genuine conviction that he held all along, why wasn't
2 he straight and honest with me on our first meeting in
3 August when he was first elected to faculty? Why didn't
4 he say something? Why didn't he do something?

5 Q. Objection, nonresponsive.

6 A. All right.

7 Q. My question is do you believe that he does
8 not have the theological ability to look at that passage
9 and make a reasonable interpretation based on his
10 theological background?

11 A. I can't say that.

12 Q. Okay. Do you think, based on what you know
13 of his educational background, plus all of his writings,
14 that he is considered and recognized as one of the
15 prominent theologians in Southern Baptist life? Would
16 you agree with that?

17 A. I would agree that he is considered one of
18 many, yes.

19 Q. Correct, okay. And so if he says, "This is
20 my theological belief on that", and there are others who
21 have a different theological belief, are not both of them
22 entitled to the respect that this is a theological
23 belief? Are they not entitled to that respect?

24 MS. MERICA: Objection, form.

25 THE WITNESS: I think the priesthood of

1 the believer guarantees that, yeah.

2 BY MR. SHARPE:

3 Q. Thank you very much. I appreciate your
4 giving me that answer. That's it.

5 So the fact that your complaint says that you
6 believe these are his sociological beliefs, you've got
7 the right to hold that and the fact that he says that's
8 my theological belief, under the priesthood of the
9 believer he's got the right to have that position as
10 you've got the right to say it's sociological. Would you
11 agree?

12 A. No.

13 Q. You wouldn't agree?

14 A. It's his personal view if -- if he -- if he
15 -- it's not a theological distinctive or Baptist
16 distinctive on what's stated in the Baptist distinctives
17 and this is not an issue that is addressed in those and
18 so it's one of these that there are lots of personal
19 views on a particular understanding of a scripture and
20 he's exercising his personal view as being the definitive
21 view. And I don't think that claim can be made because I
22 was hired under supposedly religious criteria and that
23 religious criteria didn't change.

24 Q. And is it not true that the view he holds
25 from a historical point of view is absolutely supported

1 and from a cultural point of view with the other Southern
2 Baptist seminaries, that that's also supported by what
3 you see in the seminaries?

4 MS. MERICA: Objection to form.

5 BY MR. SHARPE:

6 Q. I mean his view is not out of step with the
7 history of the seminary?

8 A. His view is one of many.

9 Q. But it's still not out of step with the
10 number of people elected to the faculty all being male up
11 until recent time? His view is not out of step with
12 that, is it?

13 A. I wonder if part of his view is related to a
14 part of this change in the professors in the seminary
15 have to do with the change of those with the change of
16 the student body that goes to seminary because I would
17 say there was a point in time, just like with other
18 institutions, early on in the history of America where
19 seminaries or schools were started that began as
20 seminaries and men attended, but nowadays people go to
21 the Southern Baptist -- Southwestern and other seminaries
22 and they're not necessarily men and they're not
23 necessarily preparing for the pastorate. There are all
24 kinds of other things that they're preparing for, so I
25 think that perhaps in some way constitutes this change.

1 Q. How does that question answer whether he's
2 out of step with the history of the seminary?

3 A. I think that his perspective might have been
4 that perspective that would have been typical at some
5 point in history.

6 Q. Thank you. And to whatever extent that is,
7 we'll leave that to history. Okay? Would you agree with
8 that?

9 A. No comment.

10 Q. Okay, thank you. I'll accept that.

11 Are you aware of any writings in theological
12 journals and treatises that have discussed the issue of
13 whether women should be teaching in Schools of Theology?
14 Are you aware that that's been the subject of writings in
15 theological journals?

16 A. I suppose I am. I was never very --

17 Q. Okay.

18 A. -- caught up in that.

19 Q. Are you -- are you aware of the fact that
20 there are writings going both ways on that in theological
21 journals?

22 A. I would expect that that would be the case,
23 as with any passage that seems to have a wide variety of
24 understandings.

25 Q. Okay. And theological journals usually

1 address subjects of where there's difference of
2 theological interpretation. Would you agree?

3 A. Maybe not always, but at least in many cases.

4 Q. I didn't say always. I said isn't that
5 generally what they do?

6 A. In many cases.

7 Q. Okay, all right. Are you aware of any
8 language in any document at the seminary that says that
9 if you go on a tenure track, that you're guaranteed the
10 right to finish the track? Are you aware of any document
11 that says that?

12 A. I'm not, but what's the point of tenure track
13 if there isn't some sort of commitment on behalf of the
14 seminary to --

15 Q. Just was --

16 MR. RICHARDSON: Let her finish,
17 Counselor.

18 THE WITNESS: Well, that's what -- unless
19 there was some point of commitment with regard to
20 seminary, otherwise why have a tenure track or why think
21 that it's something more valuable than just simply being
22 elected to a faculty without tenure track.

23 BY MR. SHARPE:

24 Q. My question was is there anything expressly
25 stated in any document that you're aware of that says

1 that if a person begins a tenure track, they're going to
2 be able to finish all the way?

3 A. No.

4 Q. Are you aware of anything?

5 A. No.

6 Q. Thank you, very good.

7 Now you teach languages. Is that correct?

8 A. That's correct.

9 Q. And would you consider yourself to be an
10 expert in just reading a passage of language and
11 interpreting it based on ordinary rules of grammar and
12 word usage?

13 A. And work.

14 Q. And just give it a normal interpretation
15 unless there's something that suggests otherwise?

16 A. Well, it entails real work if one is going to
17 do it properly.

18 Q. Okay. All right, let me just ask you to take
19 a look at one passage and just take a look at the passage
20 itself. This New American Standard -- do you ever use
21 the New American Standard?

22 A. Not much.

23 Q. Not much, okay. Is it a recognized
24 translation of the bible?

25 A. It's one of many translations. We could go

1 off on this if you really wanted to.

2 Q. No, I'm just asking is it a recognized one?

3 A. I suppose, as well --

4 Q. Okay.

5 A. -- as some others.

6 Q. There are seminary -- some seminaries,
7 certain professors use it. I mean let's say somebody
8 like Charles Ryrie, that's his normal study bible. Do
9 you consider Charles Ryrie to be a reputable theologian?

10 A. Oh, yes.

11 Q. Okay. And if he says that's his personal
12 study translation -- the New American Standard, would you
13 have reason to think that he's not reading something
14 reasonably reliable?

15 MS. MERICA: Objection, form.

16 THE WITNESS: That's sort of -- that's
17 sort of a strange question, but --

18 BY MR. SHARPE:

19 Q. I agree.

20 A. There are always -- in translations there are
21 -- in translations from original languages are always
22 wanting in some ways and each translation has differences
23 with regard to those things that they do well and those
24 things that they don't do so well. So the fact that he
25 uses NAS, that's nice, but that doesn't mean that I

1 necessarily would think that that was the best one. It's
2 just one of a number that are used.

3 Q. Okay. My question was would you consider it
4 to be an accepted translation?

5 A. Accepted, yeah.

6 Q. Okay.

7 A. Not a paraphrase.

8 Q. That's all -- that was my point, okay.

9 Would you read into the record versus 1
10 through 7, please?

11 A. Which chapter?

12 Q. 6.

13 MR. RICHARDSON: What book?

14 BY MR. SHARPE:

15 Q. 1st Corinthians 6.

16 A. "Does any of you, when each has a case
17 against his neighbor, dare to go to law before the
18 unrighteous, and not before the saints? Or do you know
19 that the saints will judge the world. And if the world
20 is judged by you, are you incompetent -- are you not
21 competent to constitute the smallest law courts? Do you
22 not know that we shall judge angles? How much more,
23 matters of this life? If then you have law courts
24 dealing with matters of this life, do you appoint them as
25 judges who are of no account in the church? I say this

1 to your shame. If -- Is it so, that there is not among
2 you one wise man who will be able to decide between his
3 brethern, but brother goes to law with brother, and that
4 before unbelievers?"

5 Where did you want me to end?

6 Q. 7.

7 A. "Actually, then, it is already decided --
8 already a defeat for you that you have lawsuits with one
9 another. Why not rather be wronged? Why not rather be
10 defrauded?"

11 Q. What is your understanding of that passage?

12 A. My understanding is that first you attempt to
13 try and find resolution among with -- when you have a
14 problem with another believer, that you attempt to find
15 resolution with that believer first.

16 Q. Does it have within the passage, based on
17 your understanding of ordinary grammar rules, that it
18 says that there's an exception there of whether to have
19 the lawsuit or not?

20 A. I'm not sure I follow your question.

21 MS. MERICA: Objection, form.

22 BY MR. SHARPE:

23 Q. Okay. As you look at the passage, what does
24 it say about one -- or do you consider the passage
25 talking about one believer taking another believer to a

1 Romans 13 court? Is that your understanding of the
2 passage?

3 A. You mean to Corinthians?

4 Q. Yeah.

5 A. I believe it is regarding litigation between
6 believers.

7 Q. Okay. And what do you understand the
8 prohibition there about litigation concerning believers?

9 A. That one should attempt to try to resolve an
10 issue with another believer -- with that believer or
11 through the church, if possible.

12 Q. Would you read me the passage and the verse
13 in there where it supports that interpretation, please?
14 Where it says you should try to resolve it as opposed to
15 going to court.

16 A. It doesn't.

17 Q. Okay. Do you see any application of that
18 passage to your lawsuit?

19 A. I think that I do see application only in
20 this way. That if there is -- that it should be the
21 responsibility of one believer who has wronged another
22 believer to in some way and to seek to deal justly with
23 that person and righteously and that that is
24 responsibility. But in the case of the church, I have no
25 church to go to, nobody to go to in order to appeal being

1 wronged.

2 Q. Did you -- as you read that passage, did you
3 at anytime ever ask the seminary and Dr. Patterson to
4 submit your complaint to Christian mediation and, if not
5 successful, then to Christian arbitration? Did you ever
6 make that recommendation or ask -- did you ever ask that
7 happen?

8 A. I didn't know that that was -- I didn't -- I
9 wasn't aware that that was an option or that it was --
10 that anything such as that. I did attempt to discuss it
11 with him several times and really didn't know that it was
12 -- that this was a determinant issue until late in the
13 game.

14 Q. Would you say that that passage of scripture
15 that you have just read supports Christian mediation and
16 arbitration? Would you say that that's a reasonable
17 basis of applying that scripture?

18 A. And where would that arbitration and
19 mediation happen --

20 Q. I'm asking the question --

21 A. -- for someone like me?

22 Q. -- does that -- does that have a basis for
23 Christian mediation and arbitration as you read those
24 passages?

25 A. I think that the basis for Christian

1 mediation and so forth is that they are following the
2 model of Christ and that they are representing Christ,
3 and so as such they would want to deal fairly and justly.

4 Q. Okay.

5 A. With another believer.

6 Q. Read me the last two verses, please...6 and
7 7.

8 A. "But brother goes to lawsuit with brother,
9 and that before unbelievers? Actually, then, it is
10 already a defeat for you, that you have lawsuits with one
11 another. Why not rather be wronged? Why not rather be
12 defrauded."

13 Q. How would you interpret those two verses?

14 A. I would understand, first of all, that it's a
15 shame if you're not able to reconcile the problem among
16 yourselves first and that it has to be taken to some sort
17 of public -- in some sort of public way. On the other
18 hand, I'm not the -- I'm not the only one who has been
19 wronged in my family and so it's not just me.

20 Q. But doesn't it say believers should resolve
21 it in a certain manner according to the passage? Isn't
22 that what it does say?

23 A. Yeah.

24 Q. Would you agree?

25 A. It says to just accept being treated wrongly

1 by another believer.

2 Q. As opposed to going to a court, but it
3 doesn't say that you don't have a remedy, does it? It
4 just says you shouldn't go to a court. Isn't that the
5 prohibition that's there, using ordinary rules of grammar
6 on that last verse?

7 A. Well, I -- I mean I'm not going to give a
8 definitive interpretation.

9 Q. Okay.

10 A. Because I don't have the Greek in front of me
11 or anything else, so really.

12 Q. Very good. Now I have just have one final
13 question.

14 A. Okay.

15 Q. Do you believe your suit against the seminary
16 and Dr. Patterson is going to be helpful or a hindrance
17 to future employment in some other place?

18 MS. MERICA: Objection as to form.

19 THE WITNESS: I don't -- I'm sure that it
20 -- that in many ways -- well, I don't know truthfully.

21 BY MR. SHARPE:

22 Q. Okay.

23 A. And probably in some areas it will be a
24 hindrance. I don't know if it will be a help anywhere,
25 but I don't really know for sure either way.

1 MR. SHARPE: Thank you, ma'am.

2 MR. SHARPE: We're done.

3 BY MS. MERICA:

4 Q. Dr. Klouda, I just have a couple of
5 questions.

6 Did you attempt to mediate this matter
7 directly with Dr. Patterson?

8 A. Well, I did.

9 Q. By providing him with other alternatives that
10 would perhaps match his personal interpretations of
11 scripture?

12 A. I did.

13 Q. Did you also file a complaint with the EEOC
14 in this matter in which a mediation was offered?

15 A. I did.

16 Q. Did Dr. Patterson or the seminary participate
17 in that mediation?

18 A. They did not.

19 Q. Has there been another medication held in
20 order to possibly prevent this matter from going into
21 litigation?

22 A. I'm not sure what you're referring to.

23 Q. Have you been to another mediation that was
24 not conducted by the EEOC in this case?

25 A. Other than personally to Dr. Patterson with

1 Dr. Patterson, no, I don't believe so.

2 Q. Did you go -- did you attend a mediation with
3 Mr. Richardson and Ms. Bourland?

4 A. Oh, yes.

5 Q. And were any efforts made by Dr. Patterson or
6 the seminary to resolve the case there?

7 A. No.

8 MS. MERICA: Pass the witness.

9 BY MR. SHARPE:

10 Q. The mediation that was referred to by the
11 EEOC, is the Equal Employment Opportunity Commission
12 considered to be a Christian organization?

13 A. Not necessarily.

14 Q. At the time of the mediation that was
15 referred to, was this lawsuit not pending?

16 A. It was filed first with the -- first with the
17 EEOC, I believe, but I'm not sure.

18 Q. But the mediation that was attended was under
19 a court order, was it not correct?

20 A. Isn't that too bad? Yes, it was.

21 Q. Okay. And that was not a mediation or an
22 arbitration involving Christians to get it resolved. Is
23 that not correct?

24 A. Well, Dr. Patterson is a Christian.

25 Q. I'm talking about the mediator making the

1 decision or the arbitrator who would decide it, that's
2 what 1st Corinthians 6 is clearly referring to. Is not a
3 Romans 13, but a Christian organization or individual.
4 Would you agree?

5 A. I have no --

6 MS. MERICA: Objection, form.

7 THE WITNESS: I have no Christian place to
8 go.

9 BY MR. SHARPE:

10 Q. Or you weren't aware of it. Is that correct?

11 A. Well, I would have liked somebody to make me
12 aware of it.

13 Q. Had you known that there are several
14 Christian mediation organizations, had you known that
15 those exist and that they do provide this kind of service
16 for disputes involving Christians, employment issues and
17 other kind -- had you known that, would you at least have
18 considered those as opposed to filing your lawsuit?

19 A. I believe I would have.

20 MR. SHARPE: Thank you. That's all I
21 have.

22 THE VIDEOGRAPHER: We're off the video
23 record. The time is 2:50.

24 *****

25

1 _____
 2 _____
 3 _____
 4 _____
 5 _____.

6 I, DR. SHERI L. KLOUDA, have read the foregoing
 7 deposition and hereby affix my signature that same is
 8 true and correct, except as noted above.

9
 10
 11 _____
 DR. SHERI L. KLOUDA

12
 THE STATE OF _____)
 13 COUNTY OF _____)

14 Before me _____, on this day personally
 appeared DR. SHERI L. KLOUDA, known to me (or proved to
 15 me on the oath of _____ or through
 _____ (description of identity card or
 16 other document) to be the person whose name is subscribed
 to the foregoing instrument and acknowledged to me that
 17 he executed the same for the purposes and consideration
 therein expressed.

18 Given under my hand and seal of office this ____ day
 of _____, 2008.

19
 20
 21 _____
 Notary Public in and for the State of _____

22
 23
 24
 25

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

DR. SHERI L. KLOUDA,)
Plaintiff,)
VS.) Civil Action
No. 4-07CV-161-A
SOUTHWESTERN BAPTIST)
THEOLOGICAL SEMINARY and)
LEIGHTON PAIGE PATTERSON)
Defendants.)

REPORTER'S CERTIFICATION
DEPOSITION OF DR. SHERI L. KLOUDA
TAKEN FEBRUARY 26, 2008

I, Archie L. Cooper, Certified Shorthand Reporter in
and for the State of Texas, hereby certify to the
following:

That the witness, Dr. Sheri L. Klouda, was duly
sworn by the officer and that the transcript of the oral
deposition is a true record of the testimony given by the
witness;

That the deposition transcript was submitted on
February 29, 2008, to Ms. Jo Ann Merica for the witness'
examination, signature, and return to me.

That the amount of time used by each party at the
deposition is as follows:

- Mr. Roland K. Johnson - 259 minutes;
- Mr. J. Shelby Sharpe - 54 minutes;
- Ms. Jo Ann Merica - 1 minute.

That \$_____ is the deposition officer's charges
for preparing the original deposition transcript and any
copies of exhibits, charged to Defendant Southwestern
Baptist Theological Seminary.

That pursuant to information given to the deposition
officer at the time said testimony was taken, the
following includes all parties of record:

Ms. Jo Ann Merica and Mr. Gary L. Richardson,
Attorneys for Plaintiff;

Mr. Roland K. Johnson and Mr. Shannan E. Goss,
Attorneys for Defendant Southwest Baptist Theological
Seminary;

Mr. J. Shelby Sharpe, Attorney for Defendant
Leighton Paige Patterson.

1 I further certify that I am neither counsel for,
related to, nor employed by any of the parties in the
2 action in which this proceeding was taken, and further
that I am not financially or otherwise interested in the
3 outcome of the action.

Further certification requirements under the Federal
4 Rules of Civil Procedure will be certified to after they
have occurred.

5 Sworn to by me this 29th day of February, 2008.
6
7

8 Archie L. Cooper, Texas CSR 620
Expiration date: 12/31/2008
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Fort Worth, Texas 76107
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1 The original deposition was/was not returned to the
2 deposition officer;

3 If returned, the attached Changes and Signature page
4 contains any changes and the reasons therefor;

5 If returned, the original deposition was delivered
6 by regular mail/certified mail/hand-delivery to Mr.
7 Roland K. Johnson for safekeeping on _____;

8 That a copy of this certificate was served on all
9 parties shown herein.

10 Witness my hand this _____ day of _____,
11 2008.

12

13

14

Archie L. Cooper, Texas CSR 620

15

Expiration Date: 12/31/2008

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