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1
                  UNITED STATES DISTRICT COURT
                 FOR THE WESTERN DISTRICT OF TEXAS
 2
                      AUSTIN DIVISION
     RICHARD LOWERY,
 3
          Plaintiff,
                                )Case No. 1:23-cv-00129-DAE
     v.
     LILLIAN MILLS, et al.,
 4
          Defendants.
 5
 6
                 ORAL and VIDEOTAPE DEPOSITION OF
 7
                            SHERIDAN TITMAN
                            January 12, 2024
                                Volume 1
 8
 9
10
          ORAL DEPOSITION OF SHERIDAN TITMAN, Volume 1,
11
     produced as a witness at the instance of the Plaintiff,
12
     and duly sworn, was taken in the above-styled and
13
     numbered cause on January 12, 2024, from 9:02 a.m. to
14
     4:06 p.m., before Dana Shapiro, CSR, in and for the
15
     State of Illinois, reported by machine shorthand, at
16
     100 Congress Avenue, Suite 1200, Austin, Texas 78701,
     pursuant to the Federal Rules of Civil Procedure and
17
18
     any provisions stated on the record or attached hereto.
19
2.0
21
2.2
23
24
25
```

1	APPEARANCES
2	
3	FOR THE PLAINTIFF:
4	MR. ENDEL KOLDE MS. COURTNEY CORBELLO
5	INSTITUTE FOR FREE SPEECH 1150 Connecticut Ave., NW
6	Suite 801 Washington, D.C. 20036
7	202-301-1664
8	dkolde@ifs.org ccorbello@ifs.org
9	FOR THE DEFENDANTS:
10	MR. JAMES MATTHEW DOW JACKSON WALKER LLP
11	100 Congress Avenue, Suite 1100
12	Austin, Texas 78710 512-236-2230
13	mdow@jw.com -and-
14	MR. JOSEPH HUGHES UT LEGAL AFFAIRS
15	2314 Whitis Avenue Austin, Texas 78712
16	512-475-7716 jody.hughes@austin.utexas.edu
17	
18	ALSO PRESENT:
19	MR. RICHARD LOWERY, MR. RYAN POLANCO, the videographer
20	int. Ithin remited, ene vracegrapher
21	
22	
23	
24	
25	



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```
1
                  It seemed to me like earlier you were
           Q.
 2
     agreeing at least in part with part of Richard's
 3
     opinion that Hartzell had taken over the Liberty
 4
     Institute project and turned it into something
 5
     different than they had originally envisioned?
 6
           MR. DOW:
                     Objection, form, misstates the witness'
 7
     testimony.
 8
     BY THE WITNESS:
 9
                         There is some confusion here.
           Α.
                  Okay.
10
     understand that Richard thinks that the institute has
11
     been taken over and the vision has been changed. My
12
     opinion is that I understood a clear vision coming from
13
     Carlos and Richard, and I haven't seen a clear vision
14
     articulated from Justin Dyer and anyone else. So to
15
     the extent that you want to contrast that there's been
16
     a change. But the fact that I don't see a clear vision
17
     coming out for the Civitas Institute makes it difficult
18
     for me to answer your question.
19
     BY MR. KOLDE:
20
                  I thank you for clarifying that.
           Ο.
21
                  Just so we all understand what started as
2.2
     Liberty Institute project and was funded in part by the
23
     legislator eventually was implemented as something that
24
     ended up being called the Civitas Institute; is that
25
     correct?
```



1	A <mark>. Correct.</mark>
2	Q. And that is currently headed by Justin
3	Dyer; is that correct?
4	A. That's my understanding. But I also
5	understand there is a search going on to head up
6	something that's going to be a separate school or
7	something. It's not completely clear to me what it's
8	going to be.
9	Q. As part of the Civitas Institute or
10	something else?
11	A. My guess it will take over the Civitas
12	Institute or something else. I don't know for sure.
13	Q. You are not involved with that?
14	A. I'm not involved at all.
15	Q. Do you know who is running that program?
16	A. Running the search or running the?
17	Q. Well, running let's start with running
18	the search.
19	A. I don't know.
20	Q. How about converting the Civitas Institute
21	into a school, separate school of some sort?
22	A. I assume that Justin Dyer will be involved
23	in that.
24	Q. Had Justin Dyer ever been involved with the
25	McCombs School?



1 What do you mean by involved? Α. 2 Well, he was never on the faculty there; is 0. 3 that correct? 4 It's possible that he's been given some Α. 5 sort of courtesy appointment. 6 His home department is political science? Ο. 7 That's correct. Α. 8 Previous prior to coming to UT, he was at Ο. 9 University of Missouri? 10 Α. That's correct. 11 Do you think that the current Civitas 0. 12 Institute is true to Carlos and Richard's original 13 vision for the Liberty Institute? A. Again, I don't understand the vision of the 14 Civitas Institute as it currently stands. 15 16 So the answer would be essentially what you 17 said before, Carlos and Richard had a clear vision, Civitas doesn't have a clear vision? 18 19 Well, again, that's an opinion, not a fact. Α. I'm just trying to understand your opinion. 20 0. Yes, that's my opinion. 21 2.2 MR. DOW: Objection, form, asked and answered. 23 BY MR. KOLDE: 24 Q. You may answer. 25 Yeah. It's possible that Justin has clearly Α.



1	You then went on to say, "I don't have
2	strong views on this I was planning on working from
3	home on Friday, but I'm happy to come in if you think I
4	can help."
5	Did I read that correctly?
6	A. That's correct.
7	Q. Would it be fair to say based on this email
8	from August 11 to Lillian Mills that there was some
9	discussion at the August 9 meeting about whether you
10	would join a meeting with Carlos on Friday, Friday
11	being August 11 August 12 since this was sent on
12	Thursday, August 11; is that a fair statement?
13	A. Yes. But I have no recollection of what
14	the purpose of the meeting was.
15	Q. So what I'm hearing you say is you have no
16	independent recollection of the discussion or the
17	purpose of the let me rephrase that.
18	You have no independent recollection of
19	either the August 9 meeting or the purpose of the
20	August 12 meeting, but you are not disputing that you
21	wrote this on August 11?
22	A. No, I definitely wrote this email. From
23	this email I'm speculating that it may have had
24	something to do with how the business school was going
25	to interact with the Civitas Center. That's my best



```
1
     not recall if the reason for this brief conversation
 2
     was quote, Richard Lowery's public speech including
 3
     Lowery's appearance on the Hanania podcast and Lowery's
 4
     stated opinions about Hartzell's honesty and the
 5
     handling of the Liberty Institute."
 6
                  Does that refresh your recollection that
 7
     you had some conversation with Jay Hartzell about
 8
     Richard Lowery on July 19, 2022.
 9
                  If you could tell me what 's July 19, 2022
           Α.
10
     you could help me.
                  I honestly don't know.
11
                                           I just know this is
           Ο.
12
     the discovery answer that I got from -- I will
13
     represent to you I quoted it verbatim.
14
                  I can tell you I never discussed this
           Α.
15
     podcast with Jay Hartzell.
16
                  Did you discuss something else about
17
     Richard Lowery with Jay Hartzell?
18
           A. Well, I'm speculating because you are
19
     claiming -- there was -- the only thing that I can
     recall was there was a reception for the hiring of
20
21
     Justin Dyer just to have everyone who was involved in
22
     all of this to meet Justin Dyer. And perhaps that was
23
     the date.
                And so I saw Jay on that date if that -- you
24
     can find out whether those dates correspond, but we
25
     definitely didn't discuss this podcast.
```



1	Q. I understand your testimony that you didn't
2	discuss this podcast with Jay Hartzell. What I'm
3	trying to understand is what else did you discuss with
4	Jay Hartzell that relates to Richard Lowery. Fine.
5	You didn't talk about the podcast. What else did you
6	talk about?
7	A. This is the first time I'm kind of
8	understanding this. So the podcast was the day before
9	that event?
10	Q. Literally.
11	A. So I didn't know that. I hadn't heard the
12	podcast, but Jay did grumble about something that
13	Richard said, but he wasn't explicit.
13 14	Richard said, but he wasn't explicit.  Q. What was he grumbling about that Richard
14	Q. What was he grumbling about that Richard
14 15	Q. What was he grumbling about that Richard said?
14 15 16 17	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I
14 15 16 17	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I didn't know about the podcast so I had no idea what he
14 15 16	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I didn't know about the podcast so I had no idea what he was talking about, but he did mention that Richard was
14 15 16 17 18	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I didn't know about the podcast so I had no idea what he was talking about, but he did mention that Richard was being a pain.
14 15 16 17 18 19 20	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I didn't know about the podcast so I had no idea what he was talking about, but he did mention that Richard was being a pain.  Q. He described Richard as a pain?
14 15 16 17 18 19 20 21	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I  didn't know about the podcast so I had no idea what he was talking about, but he did mention that Richard was being a pain.  Q. He described Richard as a pain?  A. I don't know how he described it, but that
14 15 16 17 18 19 20 21 22	Q. What was he grumbling about that Richard said?  A. So I don't know. That's the thing. I didn't know about the podcast so I had no idea what he was talking about, but he did mention that Richard was being a pain.  Q. He described Richard as a pain?  A. I don't know how he described it, but that was my impression.

1 didn't make a whole lot of sense, but now it makes 2 perfect sense if it was the day after that podcast. 3 Q. Okay. So correct me if I'm wrong, I'm 4 trying to understand your recollection and your 5 testimony as best as I can. You had a conversation 6 with Jay Hartzell --7 It was pretty brief. You have got to Α. 8 understand we are at a reception. There is lots of 9 people there. It's not a private conversation, it's 10 not a meeting, and Jay grumbles. 11 I'm not in any way suggesting it wasn't 0. 12 brief. I'm just trying to understand --13 Α. Right. 14 -- what you remember. 0. So we can agree that 15 there was a conversation between you and Jay Hartzell, 16 a brief one at a reception, most likely on July 19, 17 2022? 18 Α. You can look up the date. 19 I don't have it, but we will ask UT for Ο. 20 that. 21 Α. Yeah. 2.2 0. You do recall that during that conversation 23 Jay Hartzell complained to you about something Richard 24 had said and was -- described him as being a pain or 25 something like that?



1	A. He didn't say that.
2	MR. DOW: Objection, form, misstates the witness'
3	prior testimony.
4	BY THE WITNESS:
5	A. Again, that was my impression.
6	BY MR. KOLDE:
7	Q. What did he say? Give me your best
8	recollection of what Jay Hartzell said?
9	A. I can't recall exactly what he said.
10	Q. But the gist of it was Richard was being a
11	pain?
12	A. It may have been I may have asked him,
13	you know, about that. He says, "Yeah, Richard is being
13 14	you know, about that. He says, "Yeah, Richard is being a pain," or something like that.
14	a pain, or something like that.
14 15	a pain, or something like that.  Q. When you say you may have asked him, you
14 15 16	a pain, or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?
14 15 16 17	a pain," or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?  A. No, I didn't ask him about the podcast
14 15 16 17	a pain," or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?  A. No, I didn't ask him about the podcast because at that point I didn't know about the podcast.
14 15 16 17 18	a pain," or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?  A. No, I didn't ask him about the podcast because at that point I didn't know about the podcast.  Q. Help me understand what did you ask Jay
14 15 16 17 18 19	<pre>a pain," or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?  A. No, I didn't ask him about the podcast because at that point I didn't know about the podcast.  Q. Help me understand what did you ask Jay Hartzell about that would have triggered a response?</pre>
14 15 16 17 18 19 20	a pain," or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?  A. No, I didn't ask him about the podcast because at that point I didn't know about the podcast.  Q. Help me understand what did you ask Jay Hartzell about that would have triggered a response?  A. No. Jay said something that gave me the
14 15 16 17 18 19 20 21	a pain," or something like that.  Q. When you say you may have asked him, you may have asked him about the podcast?  A. No, I didn't ask him about the podcast because at that point I didn't know about the podcast.  Q. Help me understand what did you ask Jay Hartzell about that would have triggered a response?  A. No. Jay said something that gave me the impression I can't remember what Jay said, but I

1	Q. Other than the July 19 conversation with
2	Jay Hartzell about Richard, did you have any other
3	conversations with you in the summer of 2022 where he
4	expressed an opinion about Richard Lowery?
5	A. I don't think so.
6	Q. Did anyone else who wasn't a lawyer come to
7	you or talk with you in the summer of 2022 and express
8	an opinion about things that Richard Lowery had said?
9	A. No.
10	Q. Lillian Mills didn't?
11	A. I don't think so.
12	Q. Burris didn't?
13	A. Not that I recall.
14	Q. Did you tell Richard Lowery that Jay
15	Hartzell was not happy with him because of the things
16	he was saying?
17	A. I might have.
18	Q. To the best of your recollection, when
19	might you have told him that?
20	A. I have no recollection of having told him
21	that, but it's possible.
22	Q. You are not disputing?
23	A. I'm not disputing. I'm not agreeing. I'm
24	just thinking it's plausible.
25	Q. So if I represented to you that Richard has



1 testified in a declaration that you told him that, you 2 wouldn't have any reason to dispute Richard Lowery's 3 testimony; is that a fair statement? 4 A. Yes. If he has an explicit conversation 5 that he can quote. 6 If you told Richard that Jay Hartzell was Ο. 7 not happy with the things he was saying, why would you 8 have told him that? 9 Again, I don't remember telling him that. Α. 10 Maybe Richard can give you context on the conversation 11 that he alleges that I told him that. 12 Would you have told him about it to kind of Q. 13 help him out? 14 What's that? Α. Q. Would you have told Richard that to help 15 16 him out because, you know, he might be getting in hot 17 water with a powerful person at UT? A. I don't recall. 18 19 (WHEREUPON, a certain document was 20 marked Deposition Exhibit No. 7, 21 for identification, as of 1/12/24.) 2.2 BY MR. KOLDE: 23 Professor Titman, showing you what's been Ο. 24 marked as Exhibit 7. I will represent to you that 25 that's a transcript that was prepared by UT lawyers or

```
1
                  No, I don't believe that.
           Α.
 2
           Ο.
                  Help me understand what you mean?
 3
     think he's being hyperbolic or do you think he is
 4
     stating something he doesn't believe to be true?
 5
           MR. DOW:
                     Objection, form, speculation.
 6
     BY MR. KOLDE:
 7
                  I want to understand your opinion of what
           O.
 8
     Richard stated based on your discussions and
 9
     relationship with him.
10
           MR. DOW:
                     Same objection.
     BY MR. KOLDE:
11
12
           Q.
                  You may answer.
13
                  Okay. Do I believe that Richard thinks
           Α.
14
     that the sole qualification for being president is
     being good at lying to Republicans. I don't believe he
15
     actually believes that. Do I believe that Richard
16
17
     believes that being a president of the university in a
     red state? It certainly helps to be able to as I would
18
19
     say bullshit the Republicans. I believe that's what he
20
     believes.
21
                  Could you see this opinion of Richard
           Ο.
2.2
     stated in the transcript that we just read together
23
     getting under Jay Hartzell's skin?
24
                     Objection, form, speculation.
           MR. DOW:
25
     BY MR. KOLDE:
```

1 Q. You may answer. 2 Can you clarify what you mean by getting 3 under the president's skin. 4 Irritate, annoy, upset? Q. 5 Yes, I think he's annoyed. 6 Objection, form, speculation. MR. DOW: 7 BY MR. KOLDE: 8 Is it plausible that this opinion is what 9 Jay Hartzell was referring to when on the very next day he told you Richard was being a pain? 10 11 MR. DOW: Objection, form, speculation. 12 BY THE WITNESS: 13 A. I don't know what Jay was referring to, but 14 this is possible. 15 BY MR. KOLDE: 16 I want to talk about a couple more opinions Q. 17 that are expressed in here. I'm sorry. Before I do, 18 and maybe I asked this earlier, I apologize if I have 19 forgotten. Do you remember Richard Lowery expressing 2.0 this opinion from when you reviewed the podcast or was 21 this the first time you recall seeing this? 2.2 Α. No, I know this quote. It's possible. 23 You did say that. Ο. 24 It's possible that I listened to the Α. 25 podcast because someone said that Richard said this,

1 I understand. It's addressed to you, it Q. 2 says, "Sheridan, Please see issue below," and she's 3 forwarding the string we have already talked about. Then she states, "Given the political mood in the 4 5 country today this is not acceptable and is potentially 6 quite dangerous"? 7 Α. Uh-huh. Is that what she wrote? 8 0. 9 Α. Yes. 10 Ο. What do you think about Laura Starks's 11 framing of the issue as dangerous? 12 MR. DOW: Objection, form, speculation. 13 BY MR. KOLDE: 14 I'm trying to understand what your opinion Ο. 15 is about it. Objection, form, speculation. 16 MR. DOW: 17 BY THE WITNESS: If you could be more specific. 18 Α. 19 BY MR. KOLDE: 2.0 Okav. Would you agree with me that O. I can. 21 in this email Laura Starks is characterizing Richard 22 Lowery's tweet as not acceptable? 23 Well, she says explicitly this is not 24 acceptable. 25 O. Would you agree that in this email Laura



1	Starks is describing the tweet as potentially quite
2	dangerous?
3	A. She says explicitly "and is potentially
4	quite dangerous."
5	Q. Do you believe that Richard's Romanov tweet
6	was potentially quite dangerous, you, Sheridan Titman?
7	A. Okay. The concern, and I have talked to
8	Richard about this later, the concern was that he's
9	talking about supporting the supporting the
10	communists, supporting the murder of Romanov children.
11	That seems a little offensive, and the average reader
12	doesn't realize that we are talking about a historical
13	event. They have no idea who the Romanovs are. And so
14	the concern was that we are inviting communists that
14	the concern was that we are inviting communists that
14 15	the concern was that we are inviting communists that talk about murdering children.
14 15 16	the concern was that we are inviting communists that talk about murdering children.  Q. Well, it is sad actually that the average
14 15 16 17	the concern was that we are inviting communists that talk about murdering children.  Q. Well, it is sad actually that the average reader doesn't know who the Romanovs are, but I
14 15 16 17 18	the concern was that we are inviting communists that talk about murdering children.  Q. Well, it is sad actually that the average reader doesn't know who the Romanovs are, but I understand your answer. I'm going to redirect you
14 15 16 17 18 19	the concern was that we are inviting communists that  talk about murdering children.  Q. Well, it is sad actually that the average reader doesn't know who the Romanovs are, but I understand your answer. I'm going to redirect you though to the words used by Laura Starks. Do you agree
14 15 16 17 18 19 20	the concern was that we are inviting communists that talk about murdering children.  Q. Well, it is sad actually that the average reader doesn't know who the Romanovs are, but I understand your answer. I'm going to redirect you though to the words used by Laura Starks. Do you agree or not with Laura Starks's description of the Romanov
14 15 16 17 18 19 20 21	the concern was that we are inviting communists that talk about murdering children.  Q. Well, it is sad actually that the average reader doesn't know who the Romanovs are, but I understand your answer. I'm going to redirect you though to the words used by Laura Starks. Do you agree or not with Laura Starks's description of the Romanov tweet as quote, potentially quite dangerous, end quote?
14 15 16 17 18 19 20 21 22	the concern was that we are inviting communists that  talk about murdering children.  Q. Well, it is sad actually that the average reader doesn't know who the Romanovs are, but I  understand your answer. I'm going to redirect you  though to the words used by Laura Starks. Do you agree or not with Laura Starks's description of the Romanov  tweet as quote, potentially quite dangerous, end quote?  A. I'm trying to explain to you what I think

```
1
     about this going to 10,000 people. And I'm trying to
 2
     explain why people did not like this tweet.
 3
           Q.
                  When you say people, you are
 4
     specifically --
 5
           Α.
                  Meeta Kothare, Laura Starks.
 6
                  I'm trying to understand. This is meant
           O.
 7
     respectfully.
 8
           Α.
                  Uh-huh.
 9
                  Do you have any reason to believe that
           O.
10
     either Meeta or Laura is dyslexic?
11
           Α.
                  No.
12
                  Do they have any cognitive disabilities
           Ο.
13
     that you know of?
14
           Α.
                  No.
15
           Ο.
                  So if we go to the -- your response, which
16
     is on page 2 of Exhibit 8.
17
           Α.
                  Okay.
                  You respond at 5:42 a.m. on the same day,
18
           0.
19
     August 22, 2022, and you say, "I have no idea what this
20
     means and try to avoid Twitter. What is he referring
21
     to regarding the Romanov children? We should have a
22
     discussion of what is appropriate on Twitter - we want
23
     to encourage intellectual discourse, but I don't think
24
     rude comments are acceptable?"
25
                  Is that what you wrote?
```



1	A. Correct.
2	Q. What did you mean when you said, "What is
3	he referring to regarding the Romanov children?"
4	A. I didn't know what he was referring to.
5	Q. Do you know now?
6	A. What's that?
7	Q. Do you know now?
8	A. I think so. I recall he brought in some
9	speaker, and I don't know what the speaker said, but.
10	Q. Does this refresh your recollection he
11	brought in the Salem Center brought in a left wing
12	speaker
13	A. Right.
14	Q who at one point expressed the opinion
15	that the KGB or the Chekas shooting the Romanov
16	children was a good thing?
17	A. Okay. That's my recollection, but I'm not
18	sure about that.
19	Q. You don't know about the historical event?
20	A. I don't know about the historical event. I
21	don't know who the speaker was. But I recall Richard
22	saying something vaguely along those lines.
23	Q. Does it refresh your recollection it was
24	the editor of Jacobin Magazine?
25	A. Yes.

1	Q. You understand the Jacobins to be this sort
2	of extreme left wing faction during the French
3	Revolution, chopped a lot of heads off and stuff?
4	A. I don't know much about that.
5	Q. Help me understand what happened here with
6	this email. Is it possible that you, Sheridan Titman,
7	didn't carefully read the tweet and accepted the
8	framing of the tweet as unsafe by Laura and Meeta?
9	A. I think the answer to that is yes, but
10	and sometimes that's my point. Okay. I may have seen
11	this from Meeta, read her email quickly, looked at the
12	tweet and concluded that I don't think it's good to
13	have faculty sending out tweets talking about fucking
14	communists, and killing children, and I didn't think
<mark>15</mark>	about it any further than that.
16	So but the point is, I didn't read the
17	tweet very carefully, and he's sending it to 10,000
18	people. Most of them are not reading it carefully. My
19	point is, this isn't the way that we should be having
20	intellectual discourse.
21	Q. At the time you received this tweet, you
22	were the department chair for the Finance Department,
23	correct?
24	A. That's correct.
25	Q. Did you interpret this email string as



1	Q. If you found out that Ethan and Lil and
2	asked Carlos to counsel Richard Lowery about his public
3	comments, what would you think about that?
4	A. Again, I discussed, you know, Richard's
5	tweets with him. I assume Carlos did. I mean I think
6	it's fair game to discuss these issues. If they are
7	taking any personnel action, I read that as a
8	disciplinary action. That's different than discussing.
9	Q. I want to hone in specifically on the term
10	counseling.
11	A. Okay.
12	Q. If they, that's the Deans, asked Carlos to
13	counsel Richard about his speech, would that be a
14	personnel action that you would have expected to be
15	consulted on as department chair?
16	MR. DOW: Objection, form, speculation,
17	incomplete hypothetical, also assumes facts not in
18	evidence.
19	BY MR. KOLDE:
20	Q. You may testify.
21	A. Again, it depends on the context.
22	Q. Help me understand that.
23	MR. DOW: You need to ask a question.
24	BY MR. KOLDE:
25	Q. Well, you said the context. What about the



```
1
     incite violence?
 2
                  Say that again.
           Α.
 3
           Q.
                  Could calling somebody a fascist incite
 4
     violence?
 5
           MR. DOW:
                     Objection, form, speculation,
 6
     incomplete hypothetical.
 7
     BY THE WITNESS:
                  I can't answer that.
 8
           Α.
 9
     BY MR. KOLDE:
10
                  You said earlier that you know there was
           0.
11
               I quess your concern changed.
                                              But that Meeta
     concern.
12
     and Laura had a concern about the Romanov tweet leading
13
     to violence.
                   If other UT faculty members called people
14
     fascist, should they be talked to for rude, unsafe
15
     tweets?
16
                     Same objection. Also misstates prior
           MR. DOW:
17
     testimony.
18
     BY THE WITNESS:
                  Again, I'm certainly not advocating banning
19
20
     tweets, and I don't want people policing our tweets to
     that extent. All I'm saying is that if I have to
21
     evaluate somebody and he's on my faculty and I'm sort
22
     of in charge of, you know, making suggestions on what
23
24
     they are doing if they are doing something that I find
25
     rude and potentially dangerous I will talk to them
```

```
1
     about that.
 2
     BY MR. KOLDE:
 3
           Q.
                  If Richard had continued tweeting the types
 4
     of tweets like the Romanov tweet, and that upset people
 5
     like Meeta and Laura, would that have caused Richard to
 6
     get another talking to by you while you were department
 7
     chair?
 8
           Α.
                  Talking to is a strong statement rather
 9
     than having a conversation.
10
           0.
                  We'll use your terminology. I was trying
                         So same question rephrased.
11
     to be fair to you.
12
     had continued making tweets like the Romanov tweet that
13
     upset people like Laura and Meeta and they complained
14
     to you, would that have caused you --
15
           A. I would guess.
16
                  Let me finish. Cause you to have another
           0.
17
     conversation with Richard like you did in August?
18
           Α.
                  Sure.
19
                  If it had continued repeatedly could it
20
     have led to disciplinary action?
21
                  I don't know because that's school wide
22
     policy or university wide policy.
23
           0.
                  It didn't happen because he stopped
24
     tweeting so it's a hypothetical.
25
           Α.
                  You are saying --
```



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1
                  UNITED STATES DISTRICT COURT
                 FOR THE WESTERN DISTRICT OF TEXAS
 2
                      AUSTIN DIVISION
     RICHARD LOWERY,
 3
          Plaintiff,
                                )Case No. 1:23-cv-00129-DAE
     v.
     LILLIAN MILLS, et al.,
 4
          Defendants.
 5
                     REPORTER'S CERTIFICATION
 6
                        ORAL DEPOSITION OF
                         SHERIDAN TITMAN
 7
                         January 12, 2024
          I, Dana Shapiro, a Certified Shorthand Reporter,
 8
     hereby certify to the following:
 9
10
          That the witness, SHERIDAN TITMAN, was duly sworn
11
     by the officer and that the transcript of the oral
12
     deposition is a true record of the testimony given by
13
     the witness;
14
          I further certify that pursuant to FRCP Rule
     30(e)(1) that the signature of the deponent:
15
16
     was requested by the deponent or a party before the
     completion of the deposition and that the signature is
17
     to be before any notary public and returned within 30
18
19
     days from date of receipt of the transcript.
                                                    Ιf
2.0
     returned, the attached Changes and Signature Pages
21
     contain any changes and reasons therefore;
2.2
          I further certify that I am neither counsel for,
23
     related to, nor employed by any of the parties or
24
     attorneys in the action in which this proceeding was
25
     taken, and further that I am not financially or
```



1	otherwise interested in the outcome of the action.
2	Certified to by me this January 26, 2024.
3	Dana Shapiro
4	DANA SHAPIRO, Illinois CSR 84-3597
5	CSR Expiration: 5/31/25 Illinois Certified Shorthand Reporter
6	Registered Agent Solutions, Inc., A Lexitas Company, Firm No. 17
7	5301 Southwest Parkway Corporate Center One, Suite 400
8	Austin, Texas 78735 888-893-3767
9	Expires: 1/31/2025
10	
11	
12	
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23	
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25	



1	COUNTY OF TRAVIS )
2	STATE OF TEXAS )
3	I hereby certify that the witness was notified on
4	that the witness has 30 days
5	after being notified by the officer that the transcript
6	is available for review by the witness and if there are
7	changes in the form or substance to be made, then the
8	witness shall sign a statement reciting such changes
9	and the reasons given by the witness for making them;
10	That the witness' signature was/was not returned
11	as of
12	Subscribed and sworn to on this day of
13	, 20
14	Dana Shapiro
15	DANA SHAPIRO, Illinois CSR 84-3597
16	CSR Expiration: 5/31/25 Illinois Certified Shorthand Reporter
17	Registered Agent Solutions, Inc., A Lexitas Company, Firm No. 17
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