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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RICHARD LOWERY,)
Plaintiff,)
v.) Case No. 1:23-cv-00129-DAE
LILLIAN MILLS, et al.,)
Defendants.)

ORAL and VIDEOTAPE DEPOSITION OF
LILLIAN MILLS

February 16, 2024

Volume 1

ORAL DEPOSITION OF LILLIAN MILLS, Volume 1,
produced as a witness at the instance of the Plaintiff,
and duly sworn, was taken in the above-styled and
numbered cause on February 16, 2024, from 9:02 a.m. to
5:07 p.m., before Dana Shapiro, CSR, in and for the
State of Illinois, reported by machine shorthand, at
100 Congress Avenue, Austin, Texas 78701, pursuant to
the Federal Rules of Civil Procedure and any provisions
stated on the record or attached hereto.

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Exhibit 38 tendered during this deposition was not provided prior to the completion of the final transcript. The exhibit may be produced at a later date.

1 A. It appears to be a request. Let me get the
2 dates. I can't tell. It appears to be a request for
3 police presence at the ESG Under Attack panel
4 discussion. And we arrange for police presence at
5 events regularly. So that's what this appears to be.

6 Q. There is a reference to wanting police
7 presence at the GSLI events because of Richard Lowery's
8 tweets, correct?

9 A. Correct.

10 Q. Do you think that was appropriate for
11 Madison Gove to request police presence at GSLI events
12 because of my client's tweets?

13 A. The use of the profanity is so unusual that
14 I think Madison's request is appropriate.

15 Q. So if you had been copied on this at the
16 time, you would have been supportive of her request; is
17 that correct?

18 A. I would have taken no action. She has
19 taken care of her perceived need.

20 Q. As a result, you also would not criticize
21 Meeta Kothare, who is copied on this email, for
22 allowing her request to the UT Police to go forward?

23 A. Correct.

24 Q. I'm going to try to get through a couple
25 more exhibits and we will break for lunch. So bear

1 A. I cannot speak to --

2 MR. DOW: Objection, form.

3 BY MR. KOLDE:

4 Q. You may answer.

5 A. I don't know about typically, because I did
6 not follow him on Twitter. I agree that the Romanov

7 tweet is offensive, and I agree that it was incoherent

8 in the sense of I could not understand it. I did not

9 understand it and I was offended.

10 Q. She also refers -- it sounds like you
11 partially agreed with Meeta, and I'm not sure about
12 other parts of that statement?

13 A. Had she said this tweet is incoherent, but
14 clearly offensive I would agree with that.

15 Q. Yeah. There is a reference in her email
16 back to Sheridan about one of the tweets tagging Dan
17 Patrick. Dan Patrick is the lieutenant governor. We
18 can agree on that?

19 A. Yes.

20 Q. Do you have any thoughts about Meeta's
21 concern that my client was tagging a high elected
22 government official in Texas state government about UT
23 activities?

24 A. No.

25 Q. What steps did you take to counsel Meeta

1 that my client is allowed to engage in offensive
2 speech?

3 A. Hmm. I don't remember.

4 Q. Did you take any steps?

5 A. Not that I remember.

6 Q. What steps did you take to counsel Meeta
7 Kothare that my client has a right to tag elected Texas
8 state government officials about UT activities?

9 A. I took no actions.

10 Q. What actions did you take to counsel
11 Sheridan Titman about my client's right to engage in
12 rude comments on Twitter?

13 A. I need to distinguish between the right to
14 make rude comments on Twitter from the department chair
15 of Richard Lowery also having the right to say that
16 being rude is inappropriate.

17 Q. I would still like an answer to my
18 question. What steps did you take, if any, to counsel
19 Sheridan Titman my client had a right to make rude
20 comments on Twitter? Are you able to answer my
21 question?

22 A. I'm thinking back to early August of 2022.
23 I don't remember any specific conversations with
24 Sheridan Titman about that.

25 Q. It's fair to say you took no steps to

1 counsel Sheridan Titman about my client's right to make
2 rude comments on Twitter, correct?

3 A. I do not remember any steps I took.

4 Q. What steps did you take to counsel Laura
5 Starks that my client had a right to make statements
6 that she incorrectly deemed as not acceptable and
7 potentially quite dangerous?

8 MR. DOW: Objection, form.

9 BY THE WITNESS:

10 A. My recollection is sometime in summer of
11 2022, seeing Laura Starks in the hallway and
12 acknowledging to her that Richard has the right to say
13 things in public that as colleagues -- he has the right
14 to air grievances in public even though his colleagues
15 wish he would engage in discourse to them directly.

16 Q. Did you tell Laura Starks that his tweeting
17 was not unsafe?

18 A. I did not tell that to her.

19 Q. Did you tell her that his tweets were
20 acceptable?

21 A. I did not say that either.

22 (WHEREUPON, a certain document was
23 marked Deposition Exhibit No. 39,
24 for identification, as of 2/16/24.)

25 BY MR. KOLDE:

1 event that had already occurred?

2 A. Because the coarseness implied in f***ing
3 has in my judgment potential brand effects, and so
4 letting the marketing and communications team upstream
5 of Ivy Oliver know about it seemed prudent.

6 Q. Why is it that you are willing to make
7 judgments about my client's use of the term f***ing to
8 express his emotions, but you are not willing to make
9 judgments about Meeta Kothare's emotions around safety?

10 MR. DOW: Objection, form.

11 BY THE WITNESS:

12 A. Because private correspondence is different
13 from public posts.

14 BY MR. KOLDE:

15 Q. So you are willing to pass judgment on my
16 client's perceptions because it affects the UT brand?

17 MR. DOW: Objection, form.

18 BY MR. KOLDE:

19 Q. Is that correct?

20 A. Sorry. I have got -- I'm responding only
21 to that one specific tweet and the implied coarseness,
22 I have a judgment that it's offensive and could effect
23 our brand, yes.

24 Q. With respect to your response back to
25 Meeta -- her response back to you rather she states, "I

1 including Sheridan at the meeting although you decided
2 not to; is that correct?

3 A. Sheridan says -- oh, let me see.

4 Q. He says we discussed the possibility --

5 A. The possibility.

6 Q. -- of having me join your meeting with
7 Carlos on Friday. We left it open and you said you
8 would get back to me.

9 Then you do get back to him that night?

10 A. Uh-huh.

11 Q. You say, "Hi, Sheridan. Ethan and I will
12 take this meeting and patch you in after. Your memo
13 was really helpful. Lil."

14 Isn't that correct?

15 A. Correct.

16 Q. So it was clear that there was some
17 discussion of including Sheridan, and you decided not
18 to; is that correct?

19 A. That's correct.

20 Q. From the email that Sheridan sent to you
21 and Ethan, it's also clear that there was some
22 discussion about Richard and Carlos working with Justin
23 Dyer of the Civitas Institute; is that correct?

24 A. Correct.

25 Q. So it's fair to say that you and Sheridan

1 had had some communications about this issue that you
2 were concerned about about the relationship between
3 Civitas and Salem; is that correct?

4 A. Correct.

5 Q. Clearly at this point you knew that there
6 was a topic that you were going to raise in the August
7 12 meeting, and that was than one reason you thought
8 about maybe having Sheridan attend that; is that fair?

9 A. That's -- that agrees with my memory.

10 Q. Okay. You state here that, "Your memo was
11 really helpful," to Sheridan in your response to him.
12 Did he write a memo?

13 A. I don't remember a memo. What I'm seeing
14 down here is a very detailed email. So that's all I
15 think I could have been referring to.

16 Q. Okay. So you don't recall there being some
17 kind of separate document he provided --

18 A. I do not.

19 Q. -- to you?

20 MR. DOW: Lil.

21 THE WITNESS: Wait.

22 BY MR. KOLDE:

23 Q. You asked for a break. I think that's
24 reasonable.

25 A. That's great. Thank you.

1 A. I don't know.

2 Q. In the email from Jeff Graves, in the last
3 sentence it states that "Legal," capital L, "is going
4 to provide advice to you on this matter."

5 Without telling me the contents of the
6 advice, did Legal in fact provide you advice on the
7 matter?

8 A. Yes.

9 Q. When did that occur?

10 A. Sometime between August 9 and August 12.

11 Q. What format did that occur in? By that I
12 mean was it a face-to-face conversation, a phone call,
13 a zoom, an email, something else?

14 A. I think it was face-to-face.

15 Q. Where did it take place?

16 A. In my office.

17 Q. Who was part of the conversation without
18 telling me the content of it?

19 A. I don't remember.

20 Q. Was Jay Hartzell part of the conversation?

21 A. No.

22 Q. Was Nancy Brazzil part of the conversation?

23 A. No.

24 Q. Was Amanda Cochran-McCall part of the
25 conversation?

1 A. Either her or Adam Biggs. I don't

2 remember.

3 Q. Is it possible that they were both part of
4 the conversation?

5 A. It's possible.

6 Q. How about Ethan Burris, was he part of the
7 conversation?

8 A. I believe so.

9 Q. How about Sheridan Titman, was he part of
10 the conversation?

11 A. No.

12 Q. Is there anyone else you can think of who
13 might have been part of the conversation as you sit
14 here today, even if you are not sure?

15 A. Maybe the chief marketing officer.

16 Q. That's Ivy Oliver?

17 A. Yes. But I'm not sure.

18 Q. Approximately how long was the meeting?

19 A. About an hour.

20 Q. Just so I make sure I understood your
21 testimony. Your testimony is that meeting took place
22 sometime after this August 9 email, but before the
23 August 12 meeting with Carlos Carvalho; is that
24 correct?

25 A. That's my memory.

1 thinks, and I don't know.

2 BY MR. KOLDE:

3 Q. Well, he states what he thinks here. I'm
4 asking you to draw connection with it or not, asking
5 you whether you think he might have a point or not?

6 A. I don't know.

7 Q. You don't know whether he has a point?

8 A. Right.

9 Q. You are not necessarily disagreeing with
10 what he's saying, you are just saying you don't know?

11 A. I don't know.

12 Q. Okay. You don't have a problem with him
13 expressing this. This is not unmannerly, correct?

14 A. It is not personal to an individual and,
15 therefore, I don't have a problem with it.

16 Q. You are not sure whether you disagree with
17 him, but you don't find it unmannerly?

18 A. I can disagree with a point and not be
19 offended by it.

20 Q. You were offended by his statement that
21 Hartzell was good at lying to Republicans?

22 A. Yes.

23 Q. Let's take a look at page 59 of the bold of
24 the transcript.

25 A. Yes.

1 Q. I'm going to ask you to turn to page 44.

2 Actually I withdraw that.

3 A. Okay.

4 Q. Before we take a short break, is there
5 anything in particular that you recall from my client's
6 appearance on the Hanania podcast that you felt was a
7 problem, was unmannerly or was inaccurate that sticks
8 out at you that we haven't discussed over the past hour
9 or so?

10 A. No. The two things that had stuck in my
11 mind from the podcast were that Jay Hartzell lies to
12 Republicans, and that the university is led by grifters
13 who steal money. The rest of it I didn't agree with,
14 but it didn't -- it didn't seem like a problem to me.

15 MR. KOLDE: Let's take a short break.

16 THE VIDEOGRAPHER: Off the record at
17 approximately 3:33 p.m.

18 (WHEREUPON, a recess was had.)

19 THE VIDEOGRAPHER: This is the beginning of media
20 6. We are on the record at approximately 3:39 p.m.

21 (WHEREUPON, a certain document was
22 marked Deposition Exhibit No. 46,
23 for identification, as of 2/16/24.)

24 BY MR. KOLDE:

25 Q. Showing you what's been marked as exhibit

1 Q. Let's look at section 3 of your notes,
2 which have been marked as Exhibit 20. It's fair to say
3 that that's the section of the notes that sort of focus
4 on the issue of my client's speech, correct?

5 A. Yes.

6 Q. It's correct that you and Dean Burriss went
7 into this meeting on August 12 with the plan that my
8 client's speech would be discussed with Dr. Carvalho,
9 correct?

10 A. Yes, all four of these headings were part
11 of my plan for the conversation.

12 Q. Including that you were going to discuss my
13 client's speech, correct?

14 A. Yes.

15 Q. So the first bullet there under section 3
16 states, "Mills stressed that McCombs is part of
17 UT-Austin and Salem Center is part of McCombs.
18 Specifically the Salem Center B/S is part of the
19 McCombs' accounts, and any directors serve at the
20 pleasure of the dean."

21 Why did you make that statement that any
22 director serve at the pleasure of the dean?

23 A. It's part of the totality, and partly
24 related to Richard Lowery's quotes in some of the
25 documents we just saw about "we got the money and the

1 university stole it." So this is a reminder -- B/S is
2 my shorthand for balance sheet, and it's a reminder
3 that at least with respect to the Salem Center any
4 donations that come into the Salem Center are not
5 Carlos and Richard's, they are part of the McCombs
6 School accounts. And so this is a re-assertion that
7 the Salem Center is not independent of the McCombs
8 School of Business.

9 Q. Did you feel that they needed to be
10 reminded of that?

11 A. There was a time in fall of 2020 when a
12 Salem Center employee was arrested for alleged child
13 pornography on his work computers, and I could not
14 access the Salem Center's websites because Carlos had
15 refused to provide the login and password to the
16 McCombs communications group. So I had prior
17 experience with the Salem Center that they prefer to
18 operate in a maximally independent way, and their
19 operations and attempt to be independent are profoundly
20 different from the other centers in McCombs. So with
21 that background, and with the summer quotes from both
22 Carlos and Richard about the Liberty Institute and the
23 Civitas Institute, it seemed appropriate to this one
24 time in summer of 2022 remind Carlos that the Salem
25 Center and its employees are under the direction of the

1 Q. If we could look at the last bullet on the
2 first page of Exhibit 20. You are kind of writing
3 about yourself in the third person here, "Mills/ Senior
4 Associate Burris stated that continued critiques of the
5 origins, current operation and chosen director of
6 Civitas Institute are impairing the desired functional
7 relationship, in addition to impeding the operations of
8 the school and the ability to fundraise."

9 Is that what you discussed?

10 A. Yes.

11 Q. Then it goes on, "At least one leader in
12 the Salem Center has expressed that he/they are quote,
13 effectively banned from involvement in the 'Liberty
14 Institute,' which is now called 'Civitas Institute.'"

15 Were you talking about Richard Lowery when
16 you are talking about --

17 A. Yes, because in the square parentheses it
18 quotes Professor Lowery.

19 Q. Then if we go to the second page,
20 continuation of the paragraph you mentioned the quote
21 from The College Fix article dated August 5 that we
22 just discussed. Your notes go on state, "This and
23 public tweets from Salem Senior Scholar Associate
24 Professor Lowery recommending people stop donating to
25 universities combined with video interviews claiming

1 Q. I mean it makes sense if you are asking
2 Carlos to counsel Richard that --

3 A. Richard reports to Carlos in this role.

4 Q. Yes. So I'm trying to understand what's
5 implied by this sentence, which is that you wanted
6 Carlos to counsel Richard about making those comments
7 because you wanted those comments to not be made?

8 MR. DOW: Objection, form.

9 BY THE WITNESS:

10 A. I wanted factually inaccurate comments that
11 disrupt operations --

12 BY MR. KOLDE:

13 Q. Not to be made?

14 A. -- not to be made.

15 Q. The comments we are talking about are the
16 ones that you summarized in the bullet before in your
17 notes?

18 A. Correct.

19 Q. Okay. I'm just trying to understand what
20 you mean. That's why I'm asking.

21 Are there any other comments by my client
22 that you can think of that you felt were factually
23 inaccurate and disruptive to operations as you refer to
24 in these notes other than what is listed in the
25 preceding bullet in your notes?

1 A. In bullet number two of section 3 on page
2 1, we specifically discuss Salem Center with Civitas
3 Institute, but more generally I say that I require
4 McCombs cooperate positively or neutrally with other
5 centers or institutes both within McCombs and across
6 UT. In that context I also had in mind Professor
7 Lowery's tweet about the GSLI minor where he says,
8 "these people are awful." And I view that language as
9 neither positive nor neutral. And in his role as a
10 senior scholar or associate director of the Salem
11 Center, that runs counter to an expectation that I had
12 never voiced before. So this is a setting of
13 expectations not a punishment for prior behavior that
14 the Salem Center cooperate positively or neutrally with
15 other centers.

16 Q. You agree, however, that the notes here
17 that have been marked as exhibit 20 do not refer
18 specifically to the April 2022 tweet from my client
19 referencing people being shameless and awful?

20 A. Correct. And to my memory, I did not bring
21 that up on August 12.

22 Q. Your statements you had that in mind when
23 you are talking about the expectations of
24 professionalism?

25 A. Yes.

1 had had that conversation with Carlos Carvalho before
2 this August 12 meeting?

3 A. Sheridan Titman emailed me on August 11 as
4 shown in one of these exhibits. I don't remember
5 Sheridan Titman saying in that email, "I told Carlos
6 that Jay and Lil told Richard to shut up." So I did
7 not know this claim until Carlos raised it in person
8 with me August 12.

9 Q. I will represent to you there is another
10 email in there. We can dig it out later. We have
11 about little over half hour maybe left so, but I'll
12 represent to you there is an email that references you
13 and Sheridan having a conversation on August 9 about
14 these issues for August 12. Do you recall having that
15 conversation with him?

16 A. I recall having a conversation. I don't
17 remember details about it.

18 Q. So anyway Carlos is conveying, according to
19 your notes here, Carlos is conveying what Sheridan said
20 to him or what he says Sheridan said to him about "Jay
21 and Lil want Richard to shut up." You correct him,
22 that's not what Lil and Jay want. That's not a
23 position of either of them or UT. Then you go on and
24 state in your notes, "We clarified that we expect
25 functional operations between Salem, Civitas, and other

1 institutes in McCombs. Carvalho recommended that any
2 attempt to talk with Lowery would have a higher chance
3 of success coming from Burris, with whom Lowery has no
4 baggage as yet, not Mills or Hartzell."

5 Is that what you discussed with Professor
6 Carvalho?

7 A. He said that in the meeting.

8 Q. Why did you feel it was important to
9 clarify the position of Lil and Jay and UT?

10 A. Because a statement that "Jay and Lil want
11 Richard to shut up" reads and sounds on its face as
12 contrary and against Richard's general right to express
13 opinions. And it is -- I don't know whether Sheridan
14 said that or that's what Carlos heard, but I would have
15 never said those words that I want Richard to shut up,
16 and Jay has never said that to me. Now, if he ever
17 said it to Sheridan, I don't know, but I want Richard
18 to be a leader in the school who furthers our
19 reputation by positive or neutral engagement with other
20 centers and institutes.

21 Q. How did you know what Jay's position was
22 regarding Richard's speech as discussed in these notes?

23 A. Noting that this is a summary memo of my
24 memory of the meeting at best, I would have been
25 clarifying that Jay never told me this, and I would

1 never phrase it this way. I did not call Jay Hartzell
2 to say, "Did you say you want Richard to shut up?" So
3 I don't have direct knowledge of that.

4 Q. You agree though that you spoke about Lil
5 and Jay's position on Richard's speech, correct?

6 A. Yes.

7 Q. In the section of the paragraph there is a
8 note ascribing a statement to Carlos that if someone
9 was going to meet with Richard about these issues it
10 should be Dean Burris not you or Hartzell as you two
11 apparently have baggage.

12 Did you agree with the statement that it
13 wouldn't be good for you to meet with Richard Lowery
14 about his speech?

15 A. I agree since Richard refused to meet with
16 me three years ago, it was unlikely that he would agree
17 to meet with me now. But I have no specific knowledge
18 of what baggage he has with me or Jay Hartzell.

19 Q. But you did have some knowledge at that
20 time he had been critical of your deanship, and what he
21 perceived as some of the politics that he thought you
22 were bringing into the McCombs School?

23 A. Yes. He has said so in public tweets and
24 articles.

25 Q. Did you agree with Carlos's opinion that it

1 A. Correct, but, Del, on a matter like the
2 syllabus, that's a faculty matter in which Richard
3 reports to Sheridan directly.

4 Q. In any event, Richard is still lower in the
5 chain of command than Sheridan or you or Ethan or Jay
6 Hartzell --

7 A. Correct.

8 Q. -- correct? You refer in the next sentence
9 of your notes in this section to, "Rather than take
10 disagreements regarding work issues/operations public
11 (Twitter), or sending emails to all faulty, faculty
12 members, especially center leaders, should exercise
13 good judgment and professionalism in resolving issues."

14 Here we are talking about the same material
15 that we were talking about before. You didn't think it
16 was appropriate for Richard to go and state those
17 things on the Hanania podcast or tweet those things or
18 get quoted in the article about those things; is that
19 fair?

20 A. We would have to re-tread specific comments
21 for me to re-tread which specific comments are
22 inappropriate.

23 Q. So let's chat on that a little bit. At a
24 minimum we are talking about the comments that you
25 referred to in the second to last bullet of section 3

1 of your notes on Exhibit 20, is that correct, The
2 College Fix article, public tweets?

3 A. Yes. Even if I were involved -- even if I
4 were not banned, I would have nothing to do with that.

5 Q. Right.

6 A. Right.

7 Q. The tweets about stop donating and the
8 video interview claiming that taxpayer money is stolen
9 by grifters, and the president is paid to be good at
10 lying to donors, correct?

11 A. Correct.

12 Q. We also clarify that even though you didn't
13 articulate it at this meeting, you had in mind the
14 tweet where Richard Lowery refers to some people as
15 shameless and awful, correct?

16 A. Correct.

17 Q. Although you did not mention it at this
18 meeting, you also deemed the Romanov tweet to fall into
19 that category?

20 A. Yes. And for clarity, all of that is with
21 respect to his role as a leader in the Salem Center. I
22 would be providing none of this guidance if he were
23 merely a faculty member.

24 Q. What if he were just a visiting scholar in
25 the Salem Center?

1 A. Oh.

2 Q. Let's say not a visiting scholar, but give
3 him a different title.

4 A. I can't speculate. We probably need to --
5 I probably need a more specific question.

6 Q. What's his exact title? It says in your
7 notes he's a senior scholar.

8 A. I have not checked that in the workday HR
9 system, but I know I have been referring to him as an
10 associate director, but it could be his legal title is
11 that of senior scholar.

12 Q. Do you agree that at least from the title,
13 senior scholar doesn't imply any kind of administrative
14 role?

15 A. I don't know.

16 Q. Where does it say he's associate director?

17 A. I don't know.

18 (WHEREUPON, a certain document was
19 marked Deposition Exhibit No. 47,
20 for identification, as of 2/16/24.)

21 BY MR. KOLDE:

22 Q. Looking at Exhibit 47. I'll represent to
23 you that's a short excerpt from Dean Burriss'
24 deposition. There is highlighting that begins on line
25 22 of the first page, which is numbered 156 because

1 it's an excerpt and goes through most of the second
2 page of the exhibit. It should take you, you know,
3 half a minute or less to read it. If you could read it
4 and let me know when you are done.

5 A. I have read the highlighted passages.

6 Q. Do you have any concerns about what Ethan
7 Burris testified about your and his meeting with Dr.
8 Carvalho on August 12 and the goals related to that
9 meeting?

10 A. No. And I believe they are consistent with
11 our conversation of 15 minutes ago.

12 Q. Okay. We have a little over 15 minutes
13 left. Something for you to look forward to. So I want
14 to use that time wisely since there are a few exhibits
15 I unfortunately didn't get to. But I do want to get to
16 Exhibit 13 and go through it a little bit. If you
17 could dig that out. Let me give you a choice. We have
18 been going for close to another hour. We can take a
19 five minute break and do a last 15 minute or we can
20 push through and be done. What would be your
21 preference?

22 MR. DOW: Let's just push through.

23 THE WITNESS: Okay.

24 BY MR. KOLDE:

25 Q. All right. I will represent to you that

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RICHARD LOWERY,)
Plaintiff,)
v.) Case No. 1:23-cv-00129-DAE
LILLIAN MILLS, et al.,)
Defendants.)

REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
LILLIAN MILLS
February 16, 2024

I, Dana Shapiro, a Certified Shorthand Reporter,
hereby certify to the following:

That the witness, LILLIAN MILLS, 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;

I further certify that pursuant to FRCP Rule
30(e)(1) that the signature of the deponent:
was requested by the deponent or a party before the
completion of the deposition and that the signature is
to be before any notary public and returned within 30
days from date of receipt of the transcript. If
returned, the attached Changes and Signature Pages
contain any changes and reasons therefore;

I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was

1 taken, and further that I am not financially or
2 otherwise interested in the outcome of the action.

3 Certified to by me March 12, 2024.

4 *Dana Shapiro*

5
6 DANA SHAPIRO, Illinois CSR 84-3597
7 CSR Expiration: 5/31/25
8 Illinois Certified Shorthand Reporter
9 Registered Agent Solutions, Inc.,
10 A Lexitas Company, Firm No. 17
11 5301 Southwest Parkway
12 Corporate Center One, Suite 400
13 Austin, Texas 78735
14 888-893-3767
15 Expires: 1/31/2025
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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 _____
16 DANA SHAPIRO, Illinois CSR 84-3597
17 CSR Expiration: 5/31/25
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