

# Exhibit K

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN SECTION

Docket No.  
16-CV-30184

JOHN DOE,  
Plaintiff

vs.

WILLIAMS COLLEGE,  
Defendant

DEPOSITION OF: MEAGAN BOSSONG, taken before  
Kathleen M. Houghton, Notary Public  
Stenographer, pursuant to the Federal Rules of  
Civil Procedure, at Williams College, Hopkins  
Hall, Room 201, 880 Main Street, Williamstown,  
Massachusetts on February 15, 2018, commencing  
at 9:04 a.m.

APPEARANCES:

(Please see Page 2.)

Kathleen M. Houghton  
Court Reporter

1 December of 2015?

2 Q. Yes.

3 A. No, up until that point her  
4 conversations about John's conduct were about  
5 verbal and physical assaults of her but not  
6 sexual assaults of her.

7 Q. Physical assaults?

8 A. Correct.

9 Q. What did she say?

10 A. She said that John would sometimes  
11 pinch her or if she had -- for example, she  
12 did dance and other kinds of performance. If  
13 she had bruises and they were arguing, John  
14 would press on those bruises. So that was the  
15 behavior she had described to me.

16 Q. Do you think it's odd that that was  
17 never any of her allegations in her report in  
18 her -- I'm sorry -- in her interviews?

19 MR. LAPP: Objection.

20 Q. (By Ms. Rossi) There was no -- given  
21 the fact that there was no allegations about  
22 pushing on bruises when she made a  
23 comprehensive statement to an investigator --

1           A.    That is in the report.

2           Q.    Okay.  Is it correct that Smith never  
3 mentioned any incident of nonconsensual sex at  
4 this point?

5                           MR. LAPP:  You're talking  
6 about mentioning it to Ms. Bossong as of  
7 December 2015?

8                           MS. ROSSI:  Correct.

9                           THE WITNESS:  That is  
10 correct.

11           Q.    (By Ms. Rossi)  So why didn't you  
12 give her a safety plan at this point?

13           A.    I had been safety planning with  
14 Ms. Smith all along.

15           Q.    The written safety plan that you gave  
16 to her months later --

17           A.    Mm-hmm.

18           Q.    -- are you saying you had a written  
19 safety plan prior to this?

20           A.    No.  Safety planning involves talking  
21 with people about what their plans are, for  
22 example, if an altercation occurs in a shared  
23 home, where they will go, who they will

1 contact. So safety plans are not always  
2 written documents and in many cases of  
3 relationship abuse it is not actually safe for  
4 people to have written safety plans that their  
5 partners may find.

6 Q. I'm just going to jump to this then.

7 Before we move forward, why was there  
8 a no-contact order advised to Susan Smith at  
9 this point?

10 A. I'm sorry, could you repeat the  
11 question?

12 Q. Why was there a no-contact order put  
13 in place or recommended?

14 A. Susan Smith was offered a no-contact  
15 order repeatedly and it has been my experience  
16 that when people continue to be involved with  
17 their partners that they will often decline  
18 no-contact order. She was offered, as are any  
19 people who are articulating harm in  
20 relationships, the option of both a no-contact  
21 order and an abuse prevention order through  
22 the district court.

23 Q. Okay. Let me show you this. Would