

Exhibit B

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 (Exhibit No. 39, marked.)

2 Q. (By Ms. Rossi) In this case who
3 compiled and distributed the materials for the
4 refresher training of the panel?

5 A. Who compiled and distributed the
6 materials for the refresher training of the
7 panel?

8 Q. Right, those to which you referred
9 to.

10 A. Sure. So I would have compiled them
11 but they're not distributed to the panel.
12 It's a PowerPoint presentation and then the
13 policy definitions are appended to their
14 printed materials, which I do not compile.

15 Q. Who determined what policies -- can
16 you repeat --

17 MS. ROSSI: Could you read
18 back the answer to the last question I asked?

19 (Reporter read back, as
20 requested.)

21 MS. ROSSI: Thank you.

22 Q. (By Ms. Rossi) Do you know who puts
23 together those policy definitions?

1 A. Do you mean who is responsible for
2 drafting the policies or who appends them to
3 the material?

4 Q. Who appends them to the material?

5 A. Well, Allyson Kurker includes them in
6 the cover page of her investigative report and
7 then I do the PowerPoint for the refresher
8 training.

9 Q. You've testified -- scratch that.

10 The documents show that you were
11 aware that different policies were in place at
12 different times throughout the time period in
13 question; is that correct?

14 A. If you're referring to the email that
15 was regarding -- there's an email exchange
16 that's between Allyson Kurker and Toya Camacho
17 and Toya's reference to asking me which policy
18 was in place, yes, I'm aware that there were a
19 series of policy updates and clarifications
20 made over the course of 2014 and 2015.

21 Q. Okay. And you were aware that Dean
22 Johnson was brand new to the job at the time?

23 A. Dean Johnson?