

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

LAUREN STOKES PLAINIFF

VS. CIVIL ACTION NO. 3:25CV307

GLENN BOYCE, CHANCELLOR OF THE  
UNIVERSITY OF MISSISSIPPI, IN HIS  
OFFICIAL AND PERSONAL CAPACITIES DEFENDANTS

HEARING ON MOTION FOR PRELIMINARY INJUNCTION

BEFORE HONORABLE GLEN H. DAVIDSON  
UNITED STATES SENIOR DISTRICT JUDGE

Oxford, Mississippi  
February 13, 2026

(APPEARANCES NOTED HEREIN)

---

PHYLLIS K. McLARTY, RDR, FCRR, CCR #1235  
Federal Official Court Reporter  
301 West Commerce Street  
Aberdeen, MS 39730  
(662) 369-1017

1 APPEARANCES:

2 For the Plaintiff: ALYSSON LEIGH MILLS, ESQ.  
3 650 Poydras Street  
4 Suite 1525  
5 New Orleans, LA 70130

6 LILLI EVANS BASS, ESQ.  
7 Brown Bass & Jeter, PLLC  
8 P.O. Box 22969  
9 Jackson, MS 39225

10 For the Defendants: J. CAL MAYO, JR., ESQ.  
11 PAUL BOWIE WATKINS, JR., ESQ.  
12 Mayo Mallette PLLC  
13 5 University Office Park  
14 2094 Old Taylor Road  
15 Suite 200  
16 Oxford, MS 38655

17

18

19

20

21

22

23

24

25

TABLE OF CONTENTS

1			
2	<u>PLAINTIFF'S WITNESSES</u>		<u>PAGE</u>
3	<u>LAUREN STOKES</u>		
4	Direct Examination by Ms. Mills.....		6
5	Cross-Examination by Mr. Mayo.....		25
6	<u>ANGELA ATKINS</u>		
7	Direct Examination by Ms. Mills.....		44
8	Cross-Examination by Mr. Mayo.....		53
9	<u>DR. JAMES "J. T." THOMAS</u>		
10	Direct Examination by Ms. Bass.....		54
11	<u>DR. WENDY PFRENGER</u>		
12	Direct Examination by Ms. Bass.....		62
13	<u>CALVIN WOOD</u>		
14	Direct Examination by Ms. Mills.....		70
15	Cross-Examination by Mr. Watkins.....		78
16	Redirect Examination by Ms. Mills.....		82
17	<u>ELIZABETH WILDMAN</u>		
18	Direct Examination by Ms. Mills.....		84
19	<u>LAUREN HITE</u>		
20	Direct Examination by Ms. Bass.....		90
21	<u>PLAINTIFF'S EXHIBITS</u>		<u>ADMITTED</u>
22	P-1.....		12
23	P-2.....		12
24	P-3.....		14
25	P-4.....		15
	P-5.....		17
	P-6.....		25
	P-7.....		21
	P-8.....		22
	P-9.....		49
	P-10.....		76

1 (CALL TO ORDER OF THE COURT AT 9:57 A.M.)

2 **THE COURT:** The Court has scheduled this morning a  
3 hearing on a motion for preliminary injunction in Cause Number  
4 3:25CV307, Lauren Stokes v. The Chancellor of the University of  
5 Mississippi, in His Official and Personal Capacities.

6 The record should reflect that the attorneys for the  
7 plaintiff are Alysson Leigh Mills, Lilli Evans Bass. The  
8 attorneys for the defendant, the chancellor and the university,  
9 J. Cal Mayo, Jr., and Paul Bowie Watkins, Jr.

10 Now, Counsel, I have read your submissions, your  
11 briefs relative to this matter, and I believe we can dispense  
12 with opening statements.

13 Do the attorneys wish to speak to that?

14 **MR. MAYO:** That's fine with the defendant, Your Honor.

15 **MS. MILLS:** That's fine. I do have a couple of  
16 housekeeping --

17 **THE COURT:** Very well. We'll proceed, then, with the  
18 plaintiff's case. You may call your first witness.

19 **MR. MAYO:** Your Honor, we do have one preliminary  
20 matter. We'd like to invoke the rule of exclusion. I'm not  
21 sure how many of the people here will be testifying.

22 **THE COURT:** Oh, yeah. Okay. The rule is invoked.

23 **MR. MAYO:** Yes, sir, Your Honor.

24 **THE COURT:** Any witness in the courtroom, spectators,  
25 you need to go to the witness room. Anybody who's going to

1 testify will be excluded from the courtroom.

2 **MR. MAYO:** Your Honor, I believe Ms. Stokes's husband  
3 is here, and he may be called as a witness; so --

4 **MS. MILLS:** He's not.

5 **MR. MAYO:** We may call him as a witness.

6 **MS. MILLS:** Okay.

7 **THE COURT:** Okay. Any witness is excused from the  
8 courtroom.

9 (WITNESSES EXCUSED FROM THE COURTROOM.)

10 **THE COURT:** Okay. Plaintiff may call your first  
11 witness.

12 **MS. MILLS:** Your Honor, before I do that, may I ask  
13 some leniency today with the witnesses and exhibits? Since  
14 this is a preliminary injunction hearing and the Rules of  
15 Evidence are relaxed, to keep things moving, I'd like to use  
16 exhibits as I go and offer them at the end. Would that be  
17 okay?

18 **MR. MAYO:** Your Honor, I can't answer that question  
19 without seeing the exhibits she intends to use. But we do  
20 understand that the rules for preliminary injunction purposes  
21 are relaxed from an evidentiary standpoint.

22 **MS. MILLS:** Your Honor, we call Lauren Stokes.

23 **THE COURT:** Very well. Ms. Stokes, if you will come  
24 to the witness --

25 (OATH WAS ADMINISTERED BY THE COURTROOM DEPUTY.)



1 chancellor of development, Charlotte Parks.

2 Q. Okay. Can you describe for the Court -- and I'm going to  
3 call her Charlotte. I'm going to call you Lauren. Will you  
4 describe for the Court Charlotte's job?

5 A. Charlotte's job was to work with donors and solicit  
6 donations for everything on the academic side of campus.

7 Q. Okay. How did Charlotte do that?

8 A. She did that through travel and meetings with donors and  
9 potential donors in various forms -- lunch meetings; dinner  
10 meetings; coffee; attending parties, if she was invited;  
11 et cetera.

12 Q. Okay. And how many times did you accompany her on work  
13 travel?

14 A. I never accompanied her on work travel. It was not part  
15 of my job description. I was never asked to, and I never did.

16 Q. Okay. How many times did you accompany her on any of  
17 these meetings with donors?

18 A. I didn't.

19 Q. Okay. How did you interact face-to-face with donors?

20 A. Rarely, if ever.

21 Q. Okay. How, then, did you assist Charlotte?

22 A. I assisted with everything related to administration. So  
23 I would handle her calendar, set up all of her travel. So car  
24 reservations, hotel reservations, dinner and lunch  
25 reservations. I would assemble any materials that she needed

1 for these meetings. I would reserve conference rooms for her  
2 on campus and arrange for audiovisual needs, things like that.

3 Q. Okay. Thank you.

4 Where is the development office on campus?

5 A. It's in the Carriage House, which is right next to the  
6 museum on -- the Mary Buie Museum; so it's on the fringes.

7 Q. And how many people work in that office?

8 A. Forty to fifty.

9 Q. Okay. Can you describe for the Court your relationships  
10 with your colleagues in the office?

11 A. Yeah. It's -- they're great.

12 Q. Okay. Can you describe for the Court your relationship  
13 with Charlotte?

14 A. I really loved working for Charlotte.

15 Q. Okay. Why?

16 A. She's really great at what she does, and she was very  
17 kind, and I enjoyed my time supporting her.

18 Q. Okay. So we're here today because of a social media  
19 post?

20 A. Yes.

21 Q. How did you use social media at work?

22 A. We didn't.

23 Q. Okay. How did you use social media after work?

24 A. Limitedly. I have a private Instagram account. And I  
25 had a Facebook. I thought it was deleted. It might still be

1 there. I don't -- I haven't been checking Facebook for many  
2 months; so . . .

3 Q. Okay. And we're here because of something that happened  
4 on September 10.

5 A. Yes.

6 Q. So I'm going to go back to September 10. Okay? Tell me  
7 about that day at work.

8 A. It was just very typical. It was just a normal workday,  
9 e-mails and prepping for football weekend, and just normal,  
10 typical.

11 Q. Okay. Now, after work, what did you do?

12 A. I went to my other job at a restaurant.

13 Q. Okay. Tell the Court, what is that restaurant?

14 A. My husband and I opened Tarasque Cucina over ten years  
15 ago. It's on Jackson Avenue, located here in Oxford,  
16 Mississippi.

17 Q. Okay. So were you there that evening?

18 A. Yes.

19 Q. Okay. Who else was there that evening?

20 A. The chancellor, Glenn Boyce, dined with us that evening  
21 with a guest. I think he ordered spaghetti with a monster  
22 meatball, which he really is a fan of those. And we sent him a  
23 dessert because he also has a bit of a sweet tooth.

24 Q. Okay. Is that -- is that uncommon?

25 A. It wasn't uncommon. At that time, we pretty regularly

1 fed he and guests or his wife or his family. We also -- the  
2 restaurant, not me -- but we were also part of the chancellor's  
3 box for home football games. We did some catering for that as  
4 well.

5 Q. Okay. Now, we're here because of a social media post. I  
6 want you to tell us about that, when you posted it, how.

7 A. After I left the university, I went to the restaurant,  
8 and I reposted someone's thoughts on Charlie Kirk --

9 Q. Okay.

10 A. -- to my private Instagram stories. For those who don't  
11 know, stories are up for 24 hours, and then they go away.

12 Q. Okay. After you did that --

13 MR. MAYO: Your Honor, may I move to the jury box so I  
14 can hear her?

15 THE COURT: Yes. Sure.

16 THE WITNESS: Should I speak up more?

17 (CONFERRING OFF THE RECORD.)

18 BY MS. MILLS:

19 Q. Okay. You're at the restaurant.

20 A. Uh-huh.

21 Q. What happened at the restaurant after you posted that?

22 A. It was a normal, typical evening at the restaurant. Just  
23 business as usual.

24 Q. Okay. What time did you leave the restaurant that night?

25 A. 7:30 or 8:00.

1 Q. Okay. And we're just -- we're walking through the night.

2 A. Of course.

3 Q. What happened next?

4 A. I always call my husband on my ride home because we love  
5 to chat. And he mentioned that -- I'm sorry. He mentioned  
6 that some of our friends had called him in regards to my  
7 reposting. And they just were calling to talk about it, which  
8 was interesting because the people who were our friends who  
9 called didn't follow me, but I didn't really think anything of  
10 it.

11 So I got home, and I took the story down, and I issued an  
12 apology immediately on my stories.

13 Q. Okay. I'm going to -- I'd like to show the witness her  
14 post and repost.

15 MS. MILLS: Do you have any --

16 THE COURT: Okay.

17 (CONFERRING OFF THE RECORD.)

18 BY MS. MILLS:

19 Q. Can you see that, Lauren?

20 A. I can.

21 Q. Okay. And what is that?

22 A. That is the post that I made to my stories --

23 Q. Okay.

24 A. -- on September 10th of 2025.

25 Q. Okay. And I'm putting another document up there. Do you

1 see that?

2 A. Yes, I do.

3 Q. What is that?

4 A. That is the apology that I posted after I removed the  
5 original.

6 **THE COURT:** Just a moment. I assume that one of these  
7 will be Plaintiff's Exhibit 1 and the other Plaintiff's  
8 Exhibit 2. If we could refer to them by number, for the  
9 record, please, ma'am.

10 **MS. MILLS:** Okay. I was -- gladly, yes. We will --  
11 if the Court will accept them, I will call this 1 and 2.

12 **THE COURT:** Very well.

13 There's no objection, is there, Mr. Mayo?

14 **MR. MAYO:** No, Your Honor.

15 **THE COURT:** Okay. These documents will be received  
16 into evidence as Plaintiff's Exhibits 1 and 2.

17 **THE WITNESS:** Thank you.

18 (EXHIBIT NUMBERS P-1 AND P-2 ADMITTED INTO EVIDENCE.)

19 **BY MS. MILLS:**

20 Q. Okay. Relevant to these posts, what happened next?

21 A. Well, we found out that someone had taken a screenshot of  
22 Exhibit 1 and posted it to an Oxford Facebook group called  
23 "What's Happening Oxford," which is not always known for  
24 leading with kindness. And, then, not long after we found that  
25 out, because a friend let us know about it, I received a text

1 from Charlotte Parks.

2 Q. Okay. And what was that about?

3 A. Her text was really kind, and it was -- she was checking  
4 in on me because she had heard from Lisa Stone, the Vice  
5 Chancellor of Marketing for the University of Mississippi, that  
6 people were being mean to me online.

7 Q. Okay. Approximately what time is this again?

8 A. Around 10:30, I believe.

9 Q. Okay.

10 MS. MILLS: And I would like to show that text.

11 Cal, I don't know if you have a copy. This is also, I  
12 believe, in the record already, but --

13 (CONFERRING OFF THE RECORD.)

14 COURTROOM DEPUTY: So, Alysson, will all of these be  
15 P-3?

16 MS. MILLS: Yes.

17 COURTROOM DEPUTY: All of these?

18 MS. MILLS: It's one chain. Uh-huh. Thank you.  
19 And there's no objection, Your Honor, to these.

20 THE COURT: Very well.

21 MR. MAYO: No objection, Your Honor.

22 THE WITNESS: Thank you.

23 THE COURT: There's no objection. P-3 will be  
24 admitted into evidence.

25 THE WITNESS: Thank you.

1 (EXHIBIT NUMBER P-3 ADMITTED INTO EVIDENCE.)

2 **BY MS. MILLS:**

3 **Q.** Can you see this, Lauren?

4 **A.** Yes.

5 **Q.** Okay. And what is this?

6 **A.** That is the text message that I got from Charlotte Parks  
7 and my response to it.

8 **Q.** Okay. And I think you said she was checking on you. How  
9 did that make you feel?

10 **A.** Well, I was humiliated that this was happening, but I  
11 felt really supported. And I was very, very grateful to  
12 Charlotte for her kindness and her support in this.

13 **Q.** Okay. And, again, we're just going through this night.  
14 What time is this?

15 **A.** 10:33.

16 **Q.** After that, what did you do?

17 **A.** We tried to go to bed and -- sorry. My brother goes to  
18 school at the University of Salt Lake, and he called us at 2:30  
19 in the morning. And he doesn't call that much; so it's always  
20 nice when he does. But he was the one who let John and I  
21 know -- sorry -- that I had been doxxed on X, formerly Twitter.

22 And for those lucky enough to not know what doxxing is,  
23 it's when people take all of your personal and private  
24 information, and they post it online with the intent of  
25 harassment. So someone had posted my head shot, the

1 information, and one of our restaurant -- personal address,  
2 everything that could be used to harass me.

3 So he -- my brother suggested that we take the Tarasque  
4 Facebook down. And so I did that. And then I emailed  
5 Charlotte Parks to let her know what had happened and let her  
6 know that I had been doxxed.

7 And I emailed saying that I thought it might be a good  
8 idea if I went to HR in the morning. I've never been doxxed  
9 before, and I felt that HR might have some resources or be able  
10 to help in some way.

11 Q. Okay.

12 MS. MILLS: I would like to show the plaintiff that  
13 email.

14 MR. MAYO: No objection, Your Honor.

15 THE COURT: Okay. Will this be P-4?

16 MS. MILLS: Yes, sir.

17 THE COURT: Very well. P-4 is admitted into evidence  
18 without objection.

19 THE WITNESS: Thank you.

20 (EXHIBIT NUMBER P-4 ADMITTED INTO EVIDENCE.)

21 BY MS. MILLS:

22 Q. Will you -- can you see the document on your screen,  
23 Lauren?

24 A. Yes.

25 Q. Okay. What is this?

1 A. That is the email that I sent to Charlotte Parks at 3:43  
2 in the morning, and then she responded back to me later that  
3 morning on September 11th.

4 Q. Okay. And what was the takeaway here?

5 A. She was sweet and kind and supportive about it, and she  
6 agreed that she thought it was best if I went to HR.

7 Q. Okay. And so this is now September 11, morning.

8 A. Uh-huh.

9 Q. You get up. What do you do?

10 A. I went straight to HR. And they placed me -- paced --  
11 forgive me. They placed me on paid administrative leave  
12 effective immediately to -- for my safety. And that's just  
13 what they did.

14 And then they sent the University Police Department to  
15 talk with me. And UPD suggested that I speak to the Oxford  
16 Police Department. And UPD assured me that I would be safe on  
17 campus. And at that point, I left.

18 **MS. MILLS:** Okay. I would like to show the witness  
19 the letter from the university about the administrative leave.

20 **MR. MAYO:** No objection, Your Honor.

21 **MS. MILLS:** Okay. Thank you. This will be --

22 **THE COURT:** Your number will be?

23 **MS. MILLS:** 5.

24 **THE COURT:** P-5 is admitted into evidence without  
25 objection.

1 (EXHIBIT NUMBER P-5 ADMITTED INTO EVIDENCE.)

2 **BY MS. MILLS:**

3 **Q.** Lauren, can you see this document on your screen?

4 **A.** I can.

5 **Q.** Okay. What is this?

6 **A.** That is the letter that I received placing me on paid  
7 administrative leave effective immediately.

8 **Q.** Okay. So what time is this now?

9 **A.** 9:30, 9:00ish.

10 **Q.** Okay. What happens next?

11 **A.** I went to talk to the Oxford Police Department, as I  
12 was -- it was suggested. And they agreed to drive by the  
13 restaurant more to make sure everything was copacetic. And  
14 I -- after I left OPD, I went to the restaurant. And Charlotte  
15 Parks called me, and we caught up, and she checked in. And at  
16 the end of the call, she asked me to consider resigning.

17 **Q.** Okay. And how did you respond?

18 **A.** I was very grateful for her phone call, and I said I  
19 would think about it.

20 **Q.** Okay. So this is what time again?

21 **A.** 10:30.

22 **Q.** Okay. After that call, what happened next?

23 **A.** She called back at 11:30 and asked -- asked for my  
24 resignation.

25 **Q.** Okay. And what was your response?

1 A. I said I couldn't give her an answer at that time. I  
2 wasn't -- I thought I was on paid administrative leave, and I  
3 was still playing catchup from the last 12 hours really. And  
4 so said I didn't have an answer for her. And she said that I  
5 had an hour to decide.

6 Q. Okay. And so that was 11:30ish?

7 A. Yes.

8 Q. Okay. What happened next?

9 A. She called back at 12:50ish and asked if I had an answer.  
10 And I said -- it all felt -- it was all so rushed, and I was  
11 dealing with the restaurant and work, and I said I didn't have  
12 an answer for her still. And that's when they fired me. They  
13 terminated my employment. And Bradley Salters got on the phone  
14 and said that a representative from HR would be in touch to go  
15 over my benefits.

16 MS. MILLS: Okay. Your Honor, I have a recording of  
17 that call that I would like to play.

18 Do you have any objections?

19 MR. MAYO: I don't know. I haven't heard it.

20 MS. MILLS: Okay. Do you need to hear it first?

21 MR. MAYO: Yeah.

22 (CONFERRING OFF THE RECORD.)

23 MS. MILLS: Actually, to save the Court time, what  
24 I'll do is I'll play it for Mr. Mayo at a break, and I'll offer  
25 it to the Court after we break today, if that's okay.

1                   **THE COURT:** Very well.

2                   **BY MS. MILLS:**

3                   **Q.**     Okay. So what time is this call where you're terminated?

4                   **A.**     12:50, 1:00ish in the afternoon on September 11th.

5                   **Q.**     Okay. What happens next?

6                   **A.**     I had a good cry with my husband. And then he got a  
7                   screenshot from a friend -- sorry -- of the press release  
8                   released by Chancellor Glenn Boyce.

9                   **Q.**     Okay. What was the press release about?

10                  **A.**     It was about my termination.

11                  **Q.**     Okay.

12                  **A.**     And it condemned my hateful and insensitive talk.

13                  **Q.**     Okay. And how did that make you feel?

14                  **A.**     Utterly condemned.

15                  **Q.**     And how has that affected you even today?

16                  **A.**     Sorry. People went to our house. Men older than me have  
17                  spat me in public. Sorry. People are still saying vitriolic  
18                  things to me.

19                  **Q.**     Okay.

20                  **A.**     So I was suffering and humiliated then, and I'm still  
21                  suffering and humiliated.

22                  **Q.**     How did the press release do that, though?

23                  **A.**     It made -- sorry. It made my firing newsworthy, and it  
24                  condemned me to my whole community. And it made it seem like I  
25                  had done something wrong when I hadn't.

1 Q. Okay. Remind us. What time was that?

2 A. This is about -- maybe ten minutes after I'd been  
3 terminated that the letter came through.

4 Q. Okay. And what -- sorry. I keep asking you this.

5 A. No. I'm sorry. I apologize.

6 Q. What happened next?

7 A. I would like to think that, without the press release,  
8 this could have died down. But two hours after the press  
9 release, my husband got a phone call from an unknown number.  
10 This is around 3:00. And it wasn't very great.

11 And we had been instructed to call OPD if anything  
12 strange happened. And the phone call was strange. So OPD came  
13 to the restaurant and determined that they should call in a  
14 bomb squad, which they did. And, luckily, there was no bomb,  
15 thank heavens. It was also suggested that we should leave town  
16 for our safety; so we did.

17 Q. Okay. When did the university reach out?

18 A. They didn't.

19 Q. Okay.

20 A. They didn't email, and they didn't call. The only thing  
21 I received from the university was -- excuse me -- sorry -- was  
22 a FedEx envelope mailer on October 9th.

23 Q. Okay.

24 **MS. MILLS:** And I would like to show her that. It's  
25 already in the record. It's the letter that the university

1 sent her. Is that okay?

2 **MR. MAYO:** That's fine.

3 **MS. MILLS:** I'll give you a copy in a minute.

4 Your Honor, without objection, this will be Exhibit 7.

5 **THE COURT:** Very well.

6 Exhibit Number 7 is admitted into evidence without  
7 objection.

8 **COURTROOM DEPUTY:** 6, isn't it?

9 **MS. MILLS:** 7.

10 (EXHIBIT NUMBER P-7 ADMITTED INTO EVIDENCE.)

11 **BY MS. MILLS:**

12 **Q.** All right. Do you recognize this? Is this --

13 **A.** Yes.

14 **Q.** -- the FedEx packet you received?

15 **A.** Yes.

16 **Q.** When did you receive this?

17 **A.** On October 9th.

18 **Q.** Okay. And is this the letter that you received?

19 **A.** Yes.

20 **Q.** Okay. And what is this?

21 **A.** It's the steps and procedures you can take to try to get  
22 your job back.

23 **Q.** Okay. Why did it take a month to receive this  
24 information?

25 **A.** I -- I cannot answer that.

1 Q. Did you read this letter and the accompanying  
2 information?

3 A. I did.

4 Q. Okay. And what did you understand it to mean?

5 A. I took it to mean that, if you tried to get your job  
6 back, it would go through levels of approval until it ended up  
7 at the final level of approval, which is the chancellor, Glenn  
8 Boyce.

9 Q. Okay. So what did you think that meant for you?

10 A. I didn't think it applied to me because he issued a press  
11 release about my termination; so it seemed highly unlikely he  
12 would have me back.

13 Q. Okay. And I want to -- I just want to show you one other  
14 thing related to this letter.

15 MS. MILLS: And this is the letter you submitted. Is  
16 that okay if I use this?

17 MR. MAYO: (Nods head up and down.)

18 MS. MILLS: Okay. This will be Exhibit 8.

19 THE COURT: Exhibit Number 8 is admitted into  
20 evidence --

21 MR. MAYO: No objection.

22 THE COURT: -- without objection.

23 (EXHIBIT NUMBER P-8 ADMITTED INTO EVIDENCE.)

24 BY MS. MILLS:

25 Q. Okay. This letter looks like the letter I just showed

1 you, but look at it carefully. I want to ask you, have you  
2 seen this before?

3 A. I didn't see it until we had gotten the information from  
4 the university after this had started. I never received this  
5 letter to my home or email.

6 Q. Okay. And this letter is dated what?

7 A. September 24th of 2025.

8 Q. Okay. Thank you.

9 A. Of course.

10 Q. After you received the letter dated October 7 --

11 A. Uh-huh.

12 Q. -- what did you do?

13 A. I called you. I called you.

14 Q. Okay.

15 A. Sorry.

16 Q. And what did we do after that?

17 A. We filed a lawsuit.

18 Q. Okay. Your colleagues in the development office, I want  
19 to ask you, what is your relationship with them like today?

20 A. They're still so dear and so kind, and I've been lucky  
21 enough to hang out with some of them privately and see some of  
22 them out in public. And we text. And they're so encouraging.  
23 And I was so grateful to work with them, and I am so grateful  
24 to have them in my life still.

25 Q. Okay.

1           **MS. MILLS:** Thank you, Your Honor. I pass the  
2 witness.

3           **MR. MAYO:** Your Honor, at this time, I would like to  
4 listen to the recording because I may want to examine the  
5 witness about it. So could we take a short break so I can  
6 listen to it?

7           **THE COURT:** I tell you one thing. It looked to me  
8 like you were listening pretty intently.

9           **MR. MAYO:** She's got a recording of a telephone  
10 conversation.

11           **THE COURT:** Okay.

12           **MR. MAYO:** And it's the telephone conversation I'd  
13 like to listen to.

14           **THE COURT:** Okay. What are we talking about? Ten  
15 minutes?

16           **MS. MILLS:** That's plenty.

17           **MR. MAYO:** Yes, sir. I just want to listen to it.

18           **THE COURT:** Okay. We'll -- court will be in recess  
19 for ten minutes.

20           You may step down, please, ma'am.

21           **THE WITNESS:** Thank you.

22           **THE COURT:** Court is in recess. I tell you what,  
23 we'll make it 15 minutes.

24           (RECESS TAKEN.)

25           **THE COURT:** Okay. Mr. Mayo.

1 Ms. Stokes, if you will come around and have a seat in  
2 the witness stand.

3 **MS. MILLS:** Your Honor, during the break, Mr. Mayo  
4 listened to what would be Exhibit 6, the audio recording. He  
5 has no objections. If it pleases the Court, we will play it  
6 now.

7 **THE COURT:** Very well. You offer Exhibit Number 6  
8 into evidence. The exhibit is received without objection.

9 (EXHIBIT NUMBER P-6 ADMITTED INTO EVIDENCE.)

10 **THE COURT:** Now, are we ready to proceed with the  
11 cross-examination?

12 **COURTROOM DEPUTY:** She's going to play the audio,  
13 Judge, first.

14 **THE COURT:** Pardon me?

15 **COURTROOM DEPUTY:** She's going to play the audio that  
16 she has first.

17 **THE COURT:** Okay. Very well.

18 (PLAYING RECORDING, EXHIBIT NUMBER P-6.)

19 **MR. MAYO:** May I proceed, Your Honor?

20 **THE COURT:** You may proceed.

21 **CROSS-EXAMINATION**

22 **BY MR. MAYO:**

23 **Q.** Good morning, Ms. Stokes.

24 **A.** Good morning.

25 **Q.** Before I start, can you understand me? Can you hear me?

1 A. Yes.

2 Q. Okay.

3 A. Can you hear me?

4 Q. I can.

5 A. Okay.

6 Q. I don't know if everybody else can, but I can?

7 A. Okay. I'll move up a little bit. And sorry in advance  
8 if it's too loud.

9 Q. That's fine. It's a big courtroom.

10 A. It is.

11 Q. If you need to take a break at any point, just let me  
12 know. Okay?

13 A. Thank you. I appreciate that.

14 Q. At the beginning of your testimony, there was parts I  
15 missed. I want to make sure I understood what you said at the  
16 first part of your examination.

17 A. Of course.

18 Q. I understand Tarasque is back open; correct?

19 A. Yes.

20 Q. Okay. Are you working anywhere other than at Tarasque?

21 A. No.

22 Q. Have you applied for a job anywhere else?

23 A. No.

24 Q. And you might have answered this question. Again, I  
25 apologize.

1 A. No.

2 Q. Is Tarasque back on social media?

3 A. Yes.

4 Q. It was taken down at one point?

5 A. I removed our Facebook page.

6 Q. Okay.

7 A. But I did not remove our TikTok or Instagram.

8 Q. Okay. And you personally -- I know the post you made, I  
9 believe, was on an Instagram account; is that correct?

10 A. Yes.

11 Q. Do you have -- you mentioned something about Facebook.  
12 Are you using Facebook today?

13 A. Tarasque does not -- should not have a Facebook. And I  
14 thought I deleted mine, but I have not investigated that  
15 further at this time.

16 Q. Okay. What about your Instagram account? Are you using  
17 it again?

18 A. Yes.

19 Q. Okay. Is there -- are you able to post whatever you want  
20 to post on your Instagram account?

21 A. Yes.

22 Q. I'm sorry?

23 A. Yes.

24 Q. I'm not suggesting you would do this, Ms. Stokes. But if  
25 you wanted to repost the post that you put out on September 10,

1 you could do that, couldn't you?

2 A. Yes.

3 Q. I want to move and talk a little bit more about your  
4 employment at the university. Your employment was in the  
5 development office working with Charlotte Parks, the Vice  
6 Chancellor?

7 A. Yes.

8 Q. And as her executive assistant, you helped arrange  
9 meetings for her; correct?

10 A. Yes.

11 Q. And in order to do that, you had to call out to donors or  
12 to their offices or receive calls from donors to arrange those  
13 meetings?

14 A. I did not do that, no.

15 Q. You never had a conversation with a donor or a donor's  
16 office about a meeting?

17 A. I -- I'm sorry. I may have. But, typically, I would  
18 just make a lunch meeting for her, and then she would do with  
19 that what she would.

20 Q. Okay. So you'd just make a reservation somewhere for her  
21 to have lunch. Is that what you're saying?

22 A. Typically, yes.

23 Q. Okay. Let's move forward to September 10. I think you  
24 said earlier that was a workday. What is the typical time of a  
25 workday for you?

- 1 A. It varied. Sometimes it would be 7:30 to 4:30.  
2 Sometimes it would be 8:00 to 5:00. Sometimes it would be 7:30  
3 to 5:30. It was whatever was needed.
- 4 Q. Okay. Do you recall what -- September 10, what hours you  
5 worked that day?
- 6 A. I believe I got there early, and I had permission from  
7 Charlotte to leave a little early on certain days.
- 8 Q. Okay. At some point that day, you became aware that  
9 Charlie Kirk had been shot?
- 10 A. Yes.
- 11 Q. Do you recall when you found out, generally speaking?
- 12 A. In the afternoon.
- 13 Q. Okay. And did you follow some social media that was  
14 being posted about his -- the shooting, his death?
- 15 A. They posted many things. But, yes, that was part of it.
- 16 Q. Okay. But you were -- you were getting some information  
17 off of social media about the fact --
- 18 A. Oh, no.
- 19 Q. -- that he had been shot?
- 20 A. My sister-in-law texted me about it.
- 21 Q. Okay.
- 22 A. She works on campus as well.
- 23 Q. And after you found out about that, did you see some  
24 posts about it? Was there further information or further  
25 dialogue you saw before you posted what you posted?

1 A. I didn't see any at work. But I went to social media  
2 when I got to the restaurant and parked.

3 Q. Okay. And so that would have been somewhere -- it's  
4 generally between 4:30 and 5:00?

5 A. Yes. 4:30, 5:30. Yes, sir.

6 Q. I want to show you -- this is not the same form as you  
7 were shown earlier. But Plaintiff's Exhibit Number 1 is the  
8 same language that is in your declaration. You see what I'm  
9 pointing to right here in paragraph 1?

10 A. Yes, sir.

11 Q. Okay. And I believe that post was made around 5:00 is  
12 what you said in your complaint; is that correct?

13 A. Yes, sir.

14 Q. All right. Do you know who The Colletress is?

15 A. Yes, sir.

16 Q. Who is that?

17 A. She posts about dismantling supremacy and supporting  
18 exploration of anti-colonialism and the celebration of other  
19 cultures.

20 Q. Okay. And you reposted this on your Instagram account;  
21 correct?

22 A. Yes, sir.

23 Q. All right. The next part of your declaration says, "A  
24 little later, I learned the repost had offended someone who saw  
25 it and removed it."

1           How long was a little later?

2   A.    Four or five hours. It was -- I removed it four or five  
3 hours later.

4   Q.    Okay. Well, you issued your apology at 9:30. So how far  
5 before --

6   A.    So it would have been four and a half hours.

7   Q.    Okay. So sometime later that evening before 9:30?

8   A.    Yes, sir.

9   Q.    Okay. Then you issued your apology. I want to look  
10 through that very quickly.

11   A.    Yes, sir.

12   Q.    You said, "I'm so truly and deeply sorry to those I've  
13 offended. We are lucky enough to know and employ people from  
14 all walks of life," and you list different walks of life.

15   A.    Yes, sir.

16   Q.    "In all facets we strive to be kind and hold space for  
17 all. My husband and I do not support violence of any sort. It  
18 was reposted in a heated moment on the Internet. Never heard  
19 of such. I apologize to those I have offended and look forward  
20 to getting off the Internet to reevaluate kindness, privacy,  
21 and respect for all."

22           Did I read that correctly?

23   A.    Yes, sir.

24   Q.    Okay. What was the heated moment?

25   A.    The heated moment for me was having our friends call

1 John, my husband.

2 Q. I'm sorry. Call John?

3 A. My husband. That was a heated moment for me because I  
4 felt bad that they felt hurt by it.

5 Q. So people were calling your husband and saying bad  
6 things?

7 A. They weren't saying bad things, but they were calling  
8 him, yes.

9 Q. Okay. And --

10 A. Sorry.

11 Q. You knew this at 5:00 when you posted?

12 A. I didn't know this until I called my husband after work  
13 at the restaurant that evening.

14 Q. Okay. I guess I'm trying to -- what was the heated  
15 moment that caused you to repost the original thing? You said  
16 you did it in a heated moment. What was the heated moment?

17 A. It's a valid question, and I don't have a specific answer  
18 for it. I think I just didn't realize how beloved Charlie Kirk  
19 was; so I didn't realize it was hurting people's feelings  
20 because I didn't realize how beloved he was.

21 Q. But you can't recall -- when you made the comment about  
22 it being a heated moment, you don't recall exactly what that  
23 heated moment was?

24 A. No, sir. I'm sorry. I apologize.

25 Q. Now, let's look at Plaintiff's Exhibit 3. You were shown

1 this earlier. Can you read that?

2 A. "Hi, Charlotte. You are so sweet and kind."

3 Q. I'm sorry.

4 A. Oh.

5 Q. Can --

6 A. Sorry. I'm sorry. Yes. I clearly want to help. Yes, I  
7 can read it in my head quietly and silently.

8 Q. It was a poor question, and I apologize.

9 Are you physically able to read that, or do I need to  
10 make it bigger? That's my question.

11 A. I can definitely read that. Thank you.

12 Q. All right.

13 A. Sorry, again.

14 Q. Okay. So this is about 10:30, the same evening on the  
15 10th, and Charlotte Parks reaches out to you, asked if you're  
16 okay, that Lisa Stone had called her and said you're getting  
17 attacked online?

18 A. Yes.

19 Q. And you responded, "Hi, Charlotte. You are so sweet and  
20 kind. I posted something very reactive and intense and unkind  
21 and political on my private account, which I'm not proud of,  
22 but was caught in the heat of the moment (doesn't excuse it,  
23 but sometimes the Internet can rile us up.) I deleted it, but  
24 in the interim someone screenshot it and posted it anonymously  
25 to an Oxford page about an hour ago, with 86,000 -- or 86K

1 followers. So we have had better nights, but we will be okay.  
2 Thank you for asking, and I am happy to talk more in person  
3 tomorrow if you need or want. I don't want anything to come  
4 down on Development or you, and I am so sorry if that has  
5 happened at all."

6 I'm going to go over to the next page so we can pick up.

7 A. Uh-huh.

8 Q. "John got a bunch of texts and horrible e-mails from  
9 people. I am so sorry to disturb your evening."

10 Charlotte comes back, "Gracious, no. I'm just worried  
11 about you. I hope people are more rational in the morning.  
12 These are crazy times."

13 You said, "You're too gracious and kind. And thank you.  
14 Me too. I posted an apology because dear friends were really  
15 upset when they saw it on Facebook. So hopefully everyone  
16 calms down soon. A good, if brutal, lesson to learn that  
17 nothing is truly private."

18 And Charlotte said, "Sad but true."

19 And we'll come back to the rest of the text exchange.

20 But at this time when you're texting with Ms. Parks,  
21 there's already a fair amount of turmoil going on with you and  
22 your husband and people that are making phone calls or posts or  
23 whatever they're doing; is that correct?

24 A. Yes. I had --

25 Q. Okay.

1 A. Yes.

2 Q. Okay. In fact, I believe that you received death and  
3 bomb threats; correct?

4 A. I received those threats -- yes, that is correct.  
5 May I provide clarification, please?

6 Q. Sure.

7 A. I didn't receive any bomb threats until late in the  
8 afternoon on September the 11th. And, also, in combination,  
9 there were a few death threats in the morning on September 11th  
10 and then a lot more in the afternoon of September 11th.

11 So, yes, you are correct. I did. I don't believe I  
12 received any that night.

13 Q. Okay.

14 A. Sorry.

15 Q. Well, let's --

16 A. Thank you.

17 Q. -- let's see what you said in your complaint.

18 A. Uh-huh.

19 Q. "Lauren and John and their restaurant received harassing  
20 phone calls and e-mails, including death threats and bomb  
21 threats nonstop for days."

22 A. Uh-huh.

23 Q. And this is in your complaint?

24 A. Yes.

25 Q. And then there's listed there -- and I'm not going to

1 read those because of the vulgarness of the language, but those  
2 were actual voice messages that were left, I think, at the  
3 restaurant; is that correct?

4 A. Yes, that is correct.

5 Q. And that's just a sampling of the kind of messages that  
6 were left; correct?

7 A. That is correct.

8 Q. Okay. And I think you testified earlier you left town;  
9 correct?

10 A. We were advised to for our safety. That is correct.

11 Q. And did you --

12 A. Yes, sir.

13 Q. -- leave town on the 11th?

14 A. Yes, sir.

15 Q. And how long were you gone?

16 A. My husband was gone for -- sorry. You didn't ask about  
17 him. He came back before I did. But I was gone for two and a  
18 half to three weeks.

19 Q. Two and a half to three weeks?

20 A. Yes, sir.

21 Q. Okay. And the restaurant was closed for two weeks?

22 A. Yes, sir.

23 Q. And that was a decision that you and your husband made  
24 that it needed to shut down?

25 A. Yes. We wanted to ensure the safety of our team. Sorry.

1 Yes, sir. You are correct.

2 Q. And you were concerned about your safety and the safety  
3 of your employees, the safety of your customers --

4 A. Yes.

5 Q. -- correct? And I believe that, when the restaurant did  
6 reopen, you -- you had to hire some extra security; is that  
7 correct?

8 A. Yes, sir. We hadn't hired security before. But, yes,  
9 sir, we did hire them when we reopened. Sorry.

10 Q. A fair clarification to a poorly asked question.

11 A. No. It was a great question. I apologize.

12 Q. You did not have security. You hired security when you  
13 reopened?

14 A. Yes, that is correct.

15 Q. And do you still have that security now?

16 A. No, we do not.

17 Q. How long did you have the security?

18 A. We had the security for about -- about a month, I  
19 believe. I apologize because I wasn't there for all of it.  
20 And, then, we also hired security back for the Charlie Kirk  
21 rally that happened in October.

22 Q. Okay. It's fair to say that the -- the reposting on your  
23 Instagram account and the fact that that was found, that you  
24 were doxxed -- it started on the evening of the 10th and went  
25 into the early morning hours of the 11th -- that ultimately led

1 to the closing of the restaurant and your leaving town --

2 A. Yes, sir.

3 Q. -- was extremely disruptive to you. It was extremely  
4 emotionally draining and damaging on you. Is that fair?

5 A. Yes, sir.

6 Q. Let's go to Exhibit 4. Are you physically able to read  
7 that?

8 A. Yes, sir. Sorry.

9 Q. Okay. This is at 3:43 in the morning; correct?

10 A. Yes.

11 Q. I would imagine you did not get a lot of sleep that  
12 night; correct?

13 A. Correct.

14 Q. You email Charlotte Parks. "Please forgive my late  
15 email. I got doxxed, and there's a million posts going around,  
16 along with all sorts of cruelty. I am terrified this will  
17 affect Development or, God forbid, you in some way. I have  
18 deactivated Tarasque's Facebook account, and my personal  
19 account is set to private, as is Instagram."

20 A. Yes.

21 Q. "But, as I now know, nothing is private. I'm so sorry to  
22 bug you, but thinking I should go to HR first thing tomorrow  
23 just in case to see what procedures are best or could be  
24 helpful in this case. Any suggestions are welcomed for best  
25 practices or protocol to keep everything and everyone safe and

1 protected."

2 Did I read that correctly?

3 A. Yes, sir.

4 Q. Okay. And you knew that September 11 was not going to be  
5 a typical day; right?

6 A. Yes, sir.

7 Q. And that was because of what was going on in response to  
8 what you had reposted on your Instagram account; right?

9 A. The doxxing. Yes, sir. Yes. Correct.

10 Q. And you knew that it may be difficult for you to do your  
11 job that day. That's why you wanted to go to HR and see what  
12 needed to happen. Isn't that right?

13 A. Yes.

14 Q. Ms. Parks comes back at 5:34 in the morning. "Lauren,  
15 that sounds like a good idea. I'm so sorry this is happening."

16 And, then, you responded at 7:49. "Hi, Charlotte. I'm  
17 headed there" --

18 By "there," you mean HR; correct?

19 A. Yes, sir.

20 Q. "I'm headed there now and will let you know as soon as I  
21 can what we do." Right?

22 A. Yes, sir.

23 Q. Okay. And I think you testified earlier that you met at  
24 HR -- you met with HR, and they put you on administrative leave  
25 with pay?

1 A. Yes, sir.

2 Q. And you ultimately talked with somebody from the  
3 University Police Department, who put you in touch with  
4 somebody with the Oxford Police Department to make sure that  
5 Tarasque was protected?

6 A. Yes, sir.

7 Q. Now, that week of September 11 and on September 12, there  
8 was a major donor event that was planned; correct?

9 A. Yes, sir.

10 Q. Okay. What event was that?

11 A. I might have this wrong; so please forgive me. I believe  
12 it was the Now & Ever event to celebrate the complete -- well,  
13 not completion but the success of their fundraising goal of the  
14 development office.

15 Q. Okay. And, obviously, celebrating a fundraising goal is  
16 a big deal for Development; correct?

17 A. Yes, sir.

18 Q. And there had been a lot -- a lot of planning, a lot  
19 going into that event. Is that fair?

20 A. Yes, sir.

21 Q. Okay. Had you been involved in some of that planning?

22 A. I knew that it was going on that night. I wasn't really  
23 involved with the planning, no, sir.

24 Q. There were other people in Development who were spending  
25 a lot of time getting ready for the event?

1 A. Yes.

2 Q. And this was an event that would take place at The  
3 Jefferson; is that correct?

4 A. Yes, I believe so.

5 Q. Okay. Let's go back to Plaintiff's Exhibit Number 3.  
6 These are the text messages.

7 So we're now on September 11. And there's a -- the first  
8 text message, I believe, is at 8:45 a.m.

9 A. Yes, sir.

10 Q. Do you see that?

11 A. Yes, sir.

12 Q. And that's from Charlotte Parks to you that Mary Ann is  
13 going to come in and help with parking passes. Do you see  
14 that?

15 A. Yes, sir.

16 Q. And who is Mary Ann?

17 A. Mary Ann is -- she's a delight. She is a former coworker  
18 who retired who just knows everything about everything in  
19 Development.

20 Q. And the parking passes were for?

21 A. They were for donors.

22 Q. Okay. And there was also a -- you may recall. You may  
23 not -- there was a home football game that weekend; correct?

24 A. Yes, sir.

25 Q. The Arkansas game, I believe?

1 A. Yes, sir.

2 Q. Okay. And you respond back to Charlotte, "Of course it  
3 is. I have a bunch printed on my desk, including his two and  
4 Maggie Abernathy, and I think there's only one or two that were  
5 added. I'm in HR, and we are writing" --

6 I think that should be "waiting on someone"?

7 A. Yes. I apologize.

8 Q. No, that's fine. You're not the first person to make a  
9 typing error on a text message.

10 A. And it's preserved forever now.

11 Q. "We are waiting on someone to arrive. Again, I am so  
12 sorry and hope you're okay. I would never intentionally do  
13 anything to create more work for you or cause stress at any  
14 time, especially not on such a big week."

15 And the big week you're talking about is this event;  
16 correct?

17 A. The event and the football game, yes, sir.

18 Q. Okay. Then -- I believe you talked about this earlier --  
19 at around 10:30, Ms. Parks reached out to you. There was a  
20 phone conversation that took place somewhere in that time frame  
21 that you've already talked about?

22 A. Yes, sir.

23 Q. Okay. And she texted you again about speaking by noon.  
24 You had a second phone call that you've talked about; correct?

25 A. Yes, sir.

1 Q. Okay. And, then, there was a third phone call that took  
2 place about an hour later?

3 A. Yes, sir.

4 Q. And that's the recording that we listened to?

5 A. Yes, sir.

6 Q. Okay.

7 MR. MAYO: Could I have one moment, Your Honor? Your  
8 Honor, could I have one moment to confer with counsel?

9 THE COURT: Yes. Very well.

10 (CONFERRING OFF THE RECORD.)

11 BY MR. MAYO:

12 Q. Just one additional question, Ms. Stokes. Just to be  
13 clear --

14 A. Yes, sir.

15 Q. -- the termination occurred around 12:50 on September 11,  
16 the termination of your employment; correct?

17 A. Yes, sir.

18 Q. Okay.

19 MR. MAYO: Those are all the questions I have, Your  
20 Honor.

21 THE COURT: Very well. Redirect?

22 MS. MILLS: No redirect, Your Honor.

23 THE COURT: Okay. You may return to counsel table.

24 THE WITNESS: Thank you.

25 THE COURT: Thank you, please, ma'am.



1 have known her ever since.

2 Q. Okay. Did you work with her in the development office on  
3 campus?

4 A. Yes, ma'am, I did.

5 Q. Okay. Can you describe for the Court your understanding  
6 of Lauren's job?

7 A. She was the executive assistant to our vice chancellor of  
8 development. Essentially, that's like a secretary on steroids.  
9 She managed the -- a lot of day-to-day for the vice chancellor.  
10 She scheduled a lot of office-wide events for us. She just  
11 made sure that the office was running smoothly. She was, like,  
12 the person that made everything work.

13 Q. Okay. And approximately how many employees are there in  
14 this office?

15 A. It's always changing. We're always growing. I -- I  
16 don't want to say the wrong number, but it's -- it's getting up  
17 toward 50ish.

18 Q. Okay. That's fine.

19 A. It may be more.

20 Q. Okay. That's fine. And how would you describe Lauren's  
21 relationship with her colleagues in the office?

22 A. I mean, I don't -- I can't think of many people that had  
23 better relationships with our colleagues. Lauren is such a  
24 nice, personable, positive, joyous person that -- and she  
25 brought that energy to work every day.

1 Q. Now, we're here today because of a social media post.

2 A. Uh-huh.

3 Q. I want to ask you, how did you use social media yourself?

4 A. To clarify, do you mean for work or for my personal life?

5 Q. Let's do work first.

6 A. Okay. For work, I would use my personal accounts  
7 sometimes to repost giving campaigns that we were working on.  
8 Specifically, I manage -- I'm on the team that produces the Ole  
9 Miss Giving Day. And so during campaigns like that, we would  
10 repost stuff on there. Those were public posts. However, my  
11 private social media is very different than that.

12 Q. Okay. So how do you use social media in your private  
13 life?

14 A. In my private life, I mean, I'm very active in the  
15 community. I care about a lot of issues going on. I'm very  
16 political. I tend to post a lot about world events, about  
17 things happening in the world. I post about my kids. I post  
18 about plays they're in. My personal life is all over my  
19 personal social media.

20 Q. Okay. And is that -- how common is that among your  
21 colleagues in the development office?

22 A. I think everybody uses their personal social media to  
23 express their personal life. So whether -- now, some people  
24 are not as political as I am. Some people are more about the  
25 pictures of their kids. But there's many people that post --

1 make political posts on their personal social media.

2 Q. Are you aware of any university policy that prohibits  
3 that?

4 A. No. There was a time, in fact, I even asked because I  
5 was like, Maybe I shouldn't have posted that. But there  
6 isn't -- there was not one.

7 Q. Okay. All right. So let's go to Thursday, September 11.  
8 And, as you know, there was a firing that day. How did you  
9 learn about the firing?

10 A. The firing or just the sequence of events leading up to  
11 that?

12 Q. You can just -- you can --

13 A. Just start from --

14 Q. Sure, if you want to.

15 A. So September 11th was a Thursday. On Thursdays this  
16 fall, I taught. So early in the morning, I wasn't paying  
17 attention to much going on, but I did receive an email that --  
18 with talking points for how to respond to people that had -- it  
19 came from main university communications about how to respond  
20 to people who might call complaining about a social media post.

21 And I believe that was the first time I had even heard of  
22 it. I didn't get any complaints. I had not gotten any  
23 e-mails. So I didn't know much about it. Nobody in my  
24 classroom -- when I -- I adjunct taught a class at the  
25 journalism program, and nobody in my classroom was talking

1 about it. So I didn't hear about it much until I got back to  
2 the office and was able to talk to people about what was going  
3 on.

4           Shortly thereafter, we received a second email with  
5 updated talking points that included the information that the  
6 employee had been fired. And that is how we found out that  
7 Lauren had been fired.

8 **Q.**     Okay. How did you know it was Lauren?

9 **A.**     When I got to the office, there were people who showed me  
10 what had been going on and showed me some of the -- I'm not on  
11 Twitter. I think it's a cesspool; so I don't go on there. I'm  
12 not on -- I'm not on some of the social media areas that this  
13 had been spread around. And so other people had taken  
14 screenshots of some of the negativity and showed it to me. So  
15 that's how I found out it was Lauren.

16 **Q.**     Okay. And how did that affect your day?

17 **A.**     Oh, I was -- I was devastated. First of all, that --  
18 I'm -- I'm a -- Lauren is the type of person that it bothers  
19 her to think that she hurt someone's feelings. And to think  
20 that she felt she was wrong and felt sad and felt like she had  
21 hurt people -- and I know that she was just stating her  
22 opinion. And it hurt me to know how bad she felt, how sad that  
23 she was, how devastated she was and the hate and vitriol that  
24 was coming her way from this online mob of weirdos. And they  
25 were. They were an online mob of weirdos. Just -- it was

1 devastating to think about what she and her husband were going  
2 through.

3 Q. Okay. Thank you.

4 Did you receive an email from the chancellor that day?

5 A. Yes. The chancellor's email may have come even before  
6 the guidance, but I may have skipped over it and just went  
7 right to the guidance email. I can't remember the sequence of  
8 that.

9 Q. Okay. I'd like to show that to you, but, first, I need  
10 to share it with opposing counsel.

11 MS. MILLS: Your Honor, with no objection -- I believe  
12 this will be Exhibit 9?

13 COURTROOM DEPUTY: That's correct.

14 MS. MILLS: Okay.

15 THE COURT: Okay. Exhibit Number 9.

16 And there's no objection, Mr. Mayo?

17 MR. MAYO: No objection, Your Honor.

18 THE COURT: Okay. Exhibit Number 9 is admitted into  
19 evidence without objection. It will become a part of the  
20 record in this case.

21 (EXHIBIT NUMBER P-9 ADMITTED INTO EVIDENCE.)

22 BY MS. MILLS:

23 Q. And can you see that, Angela?

24 A. Yes, ma'am.

25 Q. Okay. What is this?

1 A. That is the email that we received -- well, everybody on  
2 campus received at about -- I think that came in around, like,  
3 right after lunch.

4 Q. Okay. Yeah. And it's addressed to who?

5 A. Faculty, staff, and students.

6 Q. Okay. How common is it to receive an email like this?

7 A. About a firing on campus? Absolutely unheard of.

8 Q. Okay. And what effect did this have on you?

9 A. I was angry. I was angry. I really felt that the first  
10 message that we had sent out earlier -- the talking points that  
11 we had discussed were -- had some of this language, the part  
12 about civility, fairness, blah, blah, blah. But it was -- the  
13 message was -- this was on her personal social media, and the  
14 employee has apologized for any hurt she caused. And that was  
15 the talking points that we received that morning -- in the  
16 morning.

17 And, then, by 1:00 -- nothing had changed, but then we  
18 get that she's fired for it.

19 Q. Okay. And did you read this at the time?

20 A. Yes.

21 Q. Okay. And how does it describe the post in question?

22 A. Oh, it says, "shared (sic) hurtful, insensitive comments  
23 on social media regarding the tragic murder of Charlie Kirk.  
24 These comments run completely counter to our institutional  
25 values of civility, fairness, and respecting the dignity of

1 each person. We condemn this action, and the staff member is  
2 no longer employed by the university."

3 Q. Okay. Thank you.

4 I want to ask you about the Office of Development's  
5 events.

6 A. Sure.

7 Q. Okay. Are you familiar with the office's phone banks?

8 A. Yes. We -- the Annual Giving Group within the Office of  
9 Development runs -- it's called a phonathon. We call it  
10 student calling. If you're an alumni or have ever donated to  
11 the university, sometimes you'll get a phone call from a  
12 student, who is a student worker, to ask you to donate to the  
13 university. And it runs at night after -- after the regular  
14 workday has ended for the regular employees. And it is run  
15 through our office using a third-party vendor.

16 Q. Okay. And is that a daily thing or a once-in-a-while  
17 thing or --

18 A. It's daily Monday through Friday when the students are in  
19 session. If the students are on spring break, it's not  
20 happening. If the students -- if the university is closed for  
21 a weather event, like happened in this past month, we don't  
22 have student callers working.

23 Q. Okay. Do you know -- do the students make these phone  
24 calls on football Fridays?

25 A. They do.

1 Q. Okay.

2 A. They don't -- there's many that don't show up that day.  
3 But, yeah, they do.

4 Q. Do they make them on football game days?

5 A. No.

6 Q. Okay. Are you aware of an event specifically on Friday,  
7 September 12?

8 A. Yes, ma'am.

9 Q. Okay. And what was that event?

10 A. That was the celebration that culminated -- that was  
11 celebrating the end of a multi-year \$1.6 billion fundraising  
12 campaign called Now & Never that campaigned for Ole Miss. And  
13 this was an event that had been planned for months. Lauren was  
14 instrumental in the planning, actually, of helping things run  
15 smoothly.

16 It was an event -- hundreds of people were invited. It  
17 was at The Jefferson, catered, band. It was to celebrate our  
18 donors and tell them how much we appreciated them for giving to  
19 the campaign.

20 Q. Okay. And was that event cancelled?

21 A. No, it was not.

22 Q. Okay. And did you attend that event?

23 A. I did.

24 Q. Okay. And was it a success?

25 A. Rousing success. We had -- more people attended than we

1 even thought would attend. It was wildly successful, very  
2 positive. Everything went really well. The chancellor was  
3 there. Many people in leadership were there. It was very  
4 successful.

5 Q. Okay. Thank you, Angela.

6 MS. MILLS: Your Honor, I pass the witness.

7 THE COURT: Very well.

8 Do you have cross-examination, Mr. Mayo?

9 MR. MAYO: Just briefly, Your Honor.

10 THE COURT: Very well.

11 **CROSS-EXAMINATION**

12 **BY MR. MAYO:**

13 Q. Ms. Atkins, I want to show you -- by the way, good to see  
14 you.

15 A. Good to see you too.

16 Q. I want to show you -- if we can get it into focus. This  
17 is Plaintiff's Exhibit Number 9. You saw this earlier. This  
18 was the email that went out from the chancellor.

19 You would agree with me that this does not mention  
20 Ms. Stokes by name; correct?

21 A. It does not.

22 Q. And it does not say that she was fired; correct?

23 A. "This staff member is no longer employed by the  
24 university."

25 Q. Which means she could have resigned. There could have

1 been other ways that she left the university. Fair?

2 A. That is true, yeah.

3 MR. MAYO: No more questions, Your Honor.

4 MS. MILLS: No redirect. Thank you, Angela.

5 THE COURT: Very well.

6 Please, ma'am, you're excused. You may -- do you --  
7 just a minute. Do you anticipate calling her further?

8 MS. MILLS: No.

9 THE COURT: You may remain in the courtroom.

10 THE WITNESS: Thank you, sir.

11 THE COURT: Okay. You may call your next witness.

12 MS. BASS: Your Honor, we call Dr. James -- excuse  
13 me -- James "J. T." Thomas.

14 THE COURT: Very well.

15 (OATH WAS ADMINISTERED BY THE COURTROOM DEPUTY.)

16 COURTROOM DEPUTY: Thank you. Take a seat in the  
17 witness stand, please.

18 THE COURT: You may proceed.

19 MS. BASS: Thank you, Your Honor.

20 DR. JAMES "J. T." THOMAS, PLAINTIFF'S WITNESS, AFTER BEING

21 DULY SWORN, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

22 DIRECT EXAMINATION

23 BY MS. BASS:

24 Q. Dr. Thomas, would you please state your full name for the  
25 Court.

1 A. James Thomas.

2 Q. And, Dr. Thomas, what do you do? What's your current  
3 occupation?

4 A. I'm a sociologist and professor at the University of  
5 Mississippi.

6 Q. And can you tell us how long you've been in that  
7 position?

8 A. I started in August of 2012; so I think that is going on  
9 14 years, I think.

10 Q. And as a professor at the university, where is your  
11 office currently?

12 A. I'm in Lamar Hall on the fifth floor. Lamar Hall is  
13 right next to The Grove on campus.

14 Q. Is that the old law school?

15 A. The old law school building.

16 Q. And would you say that's a large building?

17 A. Oh, yeah. Really, really large.

18 Q. So what does that building house? What else is in the  
19 building?

20 A. Sociology and Anthropology are on the fifth floor. On  
21 the fourth floor is Writing & Rhetoric. On the third floor,  
22 you have the office of Community Engagement. You have The  
23 Sarah Isom Center for Women & Gender Studies. I cannot recall  
24 off the top of my head what's on the second floor. I know  
25 there's classroom spaces, and I think Writing & Rhetoric has

1 some office space down there as well. And, then, the first  
2 floor is classroom space.

3 Q. So there are students, professors, staff, everyone in  
4 that building?

5 A. Absolutely.

6 Q. I'm going to fast-forward to September 11. Do you know  
7 Lauren Stokes personally?

8 A. I know that she's the owner of Tarasque.

9 Q. And do you follow her on social media?

10 A. I don't.

11 Q. Have you ever followed her on social media that you're  
12 aware of?

13 A. Not that I'm aware of.

14 Q. Are you aware that she was terminated from the  
15 university?

16 A. I was made aware that she was terminated from the  
17 university.

18 Q. How did you become aware of that?

19 A. When I came to campus -- it must have been that  
20 Thursday -- I came to campus to meet with students for office  
21 hours.

22 And as I was walking to my office, a colleague came to me  
23 and said, "Have you -- have you seen what happened? Did you  
24 hear what happened?"

25 And I said, "I don't -- I don't know what you're talking

1 about." And they mentioned that someone on staff was fired for  
2 what they had said about Charlie Kirk's death.

3 So I went to my office, and I think shortly afterward  
4 is -- it might have been shortly afterwards when I saw the  
5 email from the chancellor.

6 Q. Dr. Thomas, I'm going to show you what's been previously  
7 marked as Exhibit 9. Are you able to see that okay?

8 A. Yes.

9 Q. Is that the email you were referencing?

10 A. Yes.

11 Q. And did that line up to what you had been told before you  
12 went in your office?

13 A. It lines up in that, yes, someone was fired for what they  
14 said. Yes.

15 Q. And how common is it for you to receive an email like  
16 that from the university?

17 A. I right now cannot recall receiving another email like  
18 that.

19 Q. And you said you've been with the university since when?

20 A. Since 2012.

21 Q. Before the chancellor sent this email about Lauren's  
22 firing, who had been talking about Lauren's post?

23 A. I knew nothing about Lauren's post.

24 Q. After you received this email and knew about Lauren's  
25 post and her firing, who was talking about her post then?

1 A. Gosh, lots of people on -- just on the fifth floor.  
2 Multiple colleagues. Across campus, yeah, I -- multiple  
3 conversations with multiple colleagues across campus and a few  
4 students.

5 Q. And these conversations were after you received that  
6 email?

7 A. Yes.

8 Q. I'm going to fast-forward to October 29. Are you aware  
9 of the Turning Point event that was held?

10 A. I am.

11 Q. How did you learn about that event?

12 A. I knew -- I knew that there was an event planned for  
13 campus well in advance of that event and that Charlie Kirk was  
14 supposed to have spoken at that event until he was murdered.  
15 And, yes, I mean, we -- at least a few months before the event  
16 took place, I knew that there was going to be an event on  
17 campus.

18 When he was murdered and they pivoted to having the Vice  
19 President come, I think that decision was made maybe a week or  
20 two afterward. And so there was some conversation around  
21 it just -- like, around the office about it.

22 Q. What did you do the day of the event?

23 A. The day of the event was a Wednesday. So at 11:00 a.m.,  
24 I would have taught my really large Intro to Sociology class.  
25 That class was -- I think I had about 200 students in that

1 class this last -- this last fall. And, then, also, that  
2 afternoon, I would have taught my graduate seminar.

3 Q. And were classes cancelled that day?

4 A. Some professors did cancel their classes that day, yes.

5 Q. Why was that?

6 A. A few reasons. There was an email that came, I believe,  
7 from the provost that allowed for faculty to change the  
8 modality of how they delivered their instruction and seemed to  
9 give a lot of leeway for faculty. If they needed to cancel  
10 their classes, they just needed to communicate with their  
11 department chair or their dean, depending on what unit they're  
12 in.

13 I knew that there was some faculty that I knew, because  
14 of conversations that were gleaning up to that date,  
15 considering cancelling their classes and that there were many  
16 students who were concerned about coming to class.

17 So for my graduate seminar, for example, I had indicated  
18 to them in an email that I would be on campus. I would be in  
19 the classroom. They were not required to come that day if they  
20 didn't want to.

21 And I had -- I only had one student show up for that  
22 class on Wednesday. I had students communicate to me prior to  
23 Wednesday that they didn't think they were going to be in class  
24 on Wednesday because they were worried about coming to campus.

25 Q. Why were they worried about coming to campus?

1 A. They were worried for their safety. Yeah, they were  
2 worried for their safety.

3 Q. And how did -- how did that strike you?

4 A. Reasonable. I mean, on the one hand, there was an  
5 enormous amount of law enforcement present -- presence at the  
6 University of Mississippi. I think for some students and for  
7 some folks that can be comforting. I know for a lot of other  
8 folks that's not necessarily a comforting thought to have so  
9 much law enforcement present -- presence running around campus  
10 or know -- to know that they're on campus.

11 And I also think -- given the nature of the event and the  
12 sponsor of the -- the primary sponsor of the event, the  
13 organization that sponsored that event, I also think that that  
14 was deterring students from wanting to come to campus.

15 Q. How would you describe students' feelings about the  
16 event?

17 A. Mixed.

18 MR. MAYO: Objection, Your Honor. That's -- that's  
19 hearsay. Describing students' feelings about --

20 THE COURT: Wait just a moment. Let me see.

21 "How would you describe students' feelings about the  
22 event?"

23 She didn't ask him what do the students say.

24 MR. MAYO: Yes, Your Honor. In order to know what  
25 their feelings were --

1           **THE COURT:** Okay. What were your observations insofar  
2 as students were concerned?

3           **A.** The students that I interact with had very mixed  
4 feelings. I had one student who emailed me from my Intro class  
5 that they did not feel safe coming to campus. So I excused  
6 their absence for not coming to campus that day.

7           **BY MS. BASS:**

8           **Q.** Was there anything that day cancelled that you had  
9 planned to attend?

10          **A.** I can't recall anything that was cancelled that I planned  
11 to attend that day.

12          **Q.** But you were aware of classes being cancelled throughout  
13 campus?

14          **A.** Yes. I had lots of colleagues that cancelled their  
15 classes. Oh, no. I'm sorry. I believe that day there was an  
16 event at the -- that was held by the Center For Excellence in  
17 Teaching and Learning, CETL.

18                 Yes. I was supposed to go from my 11:00 a.m. Intro class  
19 to a 12:00 p.m. event where it was going to be a discussion  
20 about how to create a community in large classrooms, like the  
21 one that I teach. And there were three or four faculty, myself  
22 included, who were supposed to participate in that panel  
23 discussion. And I believe that event was -- we got  
24 communication that, because of what was going on on campus,  
25 that they would postpone the event and try to find a future

1 date for it. So it was cancelled for that day.

2 Q. Thank you.

3 MS. BASS: I tender the witness, Your Honor.

4 MR. MAYO: No questions, Your Honor.

5 THE COURT: Okay. You may stand down.

6 THE WITNESS: Thank you.

7 THE COURT: And if you don't anticipate being called  
8 further, you may remain in the courtroom.

9 You may call your next witness.

10 MS. BASS: Your Honor, we call Dr. Wendy Pfrenger.

11 THE COURT: Very well.

12 (OATH WAS ADMINISTERED BY THE COURTROOM DEPUTY.)

13 COURTROOM DEPUTY: Thank you. You may take a seat in  
14 the witness stand, please.

15 DR. WENDY PFRENGER, PLAINTIFF'S WITNESS, AFTER BEING DULY  
16 SWORN, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

17 DIRECT EXAMINATION

18 BY MS. BASS:

19 Q. Hi, Dr. Pfrenger. Would you state your full name so it  
20 will be in the record.

21 A. Wendy Marie Clark Pfrenger.

22 Q. And, Dr. Pfrenger, what do you do for the university?

23 A. I'm the Director of Pre-college Programs in the Division  
24 of Outreach.

25 Q. And in that position, where is your office located?

1 A. So we're in the Jackson Avenue Center, which is, like --  
2 we're in the old Walmart in, like, the automotive section on  
3 Jackson Avenue.

4 Q. Across from Fraternity Row?

5 A. That's correct.

6 Q. Okay. And would you say that's a large building?

7 A. It's a large building, and we're a large division.

8 Q. What is in that building other than your office?

9 A. So we have all kinds of things. We have Professional  
10 Development and Lifelong Learning. We have General Studies,  
11 which includes Freshman Studies. We have Academic Outreach,  
12 which manages web courses and intersessions. I mean, there's  
13 many more offices. The Regional Campuses have a hub office  
14 there. We have our own marketing division.

15 Q. So several people in the building?

16 A. Lots of people.

17 Q. Lots of people. I'm going to turn your attention to  
18 September 11th when Lauren Stokes was terminated. Do you  
19 personally know Lauren?

20 A. I do not.

21 Q. How did you learn of Lauren?

22 A. I didn't know her name. My husband texted me on the  
23 afternoon of the 11th, and he said, "Hey, have you seen the  
24 email from the chancellor?"

25 And I said, "No." I was just working away.

1           So I looked, and I read it. And it didn't name her, of  
2 course. So I just -- I thought, Oh, my gosh. What's happened?

3           And I went out in my office, and nobody seemed to be  
4 quite sure. But it was after we kind of, like, put the puzzle  
5 pieces together -- people found screenshots. We figured out,  
6 like, her name, and googled where does she work on the  
7 university.

8 **Q.**     You had mentioned --

9           **MS. BASS:** I'm going to show the witness Exhibit 9.

10 **BY MS. BASS:**

11 **Q.**     You mentioned an email from the chancellor. When this is  
12 up on the screen, I want you to look at this, and let me know  
13 if this is the email you're referencing.

14 **A.**     Yes, this is the one.

15 **Q.**     Before you received this email on September 11, who was  
16 talking about Lauren's post?

17 **A.**     I don't really know. Certainly no one that I knew. I  
18 hadn't seen anything or heard anything.

19 **Q.**     So you were not aware of this at all before the  
20 chancellor's email?

21 **A.**     No. And I -- yeah, I mean, I'm on Facebook a lot. I'm  
22 not on Instagram a lot, but I'm on Facebook more than I should  
23 be probably, and I didn't know anybody that was talking about  
24 it.

25 **Q.**     Well, after this email came out, who was talking about

1 the post?

2 A. Oh, lots of people. In my office, everybody kind of  
3 talked about it and then went back in our offices and got back  
4 to work. But I know a lot of folks were feeling unsettled.

5 But over the next couple of weeks, I had folks in other  
6 offices on campus, you know, contact me -- text or phone call  
7 or people come in my office -- and say, "Can I close the door  
8 and talk?" And so there were a lot of folks talking about it  
9 afterwards.

10 Q. How did you feel receiving this email?

11 A. I felt really puzzled and unsettled. First of all, I --  
12 thinking of a social media post that could get you fired, I  
13 think some of the first thoughts that went through my head  
14 were, Well, how fast did this -- like, was it -- did it happen  
15 that fast? Can you get fired that quickly?

16 And that was one of the things other people asked me.  
17 And I said, "I honestly don't know, that I thought the process  
18 probably took some time."

19 But, yeah, I felt immediately kind of concerned about how  
20 quickly everything had unfolded. And I don't post a whole lot  
21 of sensitive material on my personal social media, but I had  
22 other folks ask me, "Do you think I should take down some  
23 posts? Should I go back and review my things? Can I still  
24 post my opinions on social media."

25 And I said, "I can't tell you. You should talk to your

1 supervisor."

2 Q. But people were coming to you worried about their posts?

3 A. People asked me about it, yes.

4 Q. And you mentioned that you thought it happened really  
5 quickly. Was there some policy or something you thought would  
6 be in place in a situation such as this?

7 A. As far as I knew, having talked to HR before, there's a  
8 policy in place where, you know, there's -- a person may be put  
9 on administrative leave. Usually there's a path to try to help  
10 restore an employee who has acted in a way that the university  
11 doesn't regard as ideal, you know, a way to try to restore them  
12 to right a relationship with their unit or whatever has  
13 happened. That has always been my impression. I have not had  
14 to terminate anyone, frankly, but that was my impression.

15 Q. I'm going to fast-forward a little bit to October 29th.

16 A. Uh-huh.

17 Q. Are you aware of the Turning Point event on campus?

18 A. Yes. Yes, I was aware.

19 Q. How did you learn about that event?

20 A. I heard about it just from "buzz." I didn't honestly  
21 know what Turning -- I had heard of Turning Point. I hadn't  
22 looked into it, but I heard about it from colleagues.

23 We were all kind of looking at it as an event that was  
24 going to bring a lot of folks to campus. And we had -- we had  
25 an event on a Wednesday night, the same Wednesday night that

1 event was going to happen. So we were kind of keeping an eye  
2 on it in my office to see how big is this going to be and  
3 what's going to happen because of it.

4 Q. Did you actually work the day of the event?

5 A. I did.

6 Q. And was your office operating as normal?

7 A. So a week before the event, I had started -- our office  
8 and the music department, who we work with on a workshop for  
9 children -- it's, like, string violin lessons on Wednesdays.  
10 Both of our offices had received inquiries from parents  
11 wondering, Are you still going to hold classes on Wednesday?  
12 And so on.

13 And at that time both our units reached out for guidance,  
14 and there wasn't yet any available in terms of traffic  
15 patterns, parking, whether things would progress as normal on  
16 that Wednesday. But I guess it was -- I think it was, like,  
17 the Monday before we finally did get that guidance.

18 And we decided we would just go ahead and cancel music  
19 lessons because it was in an area that would be impacted by  
20 Pavilion traffic. And some of my staff requested to work  
21 remotely that day. And so it was really -- like, the Jackson  
22 Avenue Center was really quiet that day. There were not a lot  
23 of folks in person. I was there.

24 And then I had another work-related meeting that was  
25 supposed to be held on campus that day. It was moved off

1 campus. So we were able to continue until about 5:30 that day  
2 off campus.

3 Q. So there were a lot of changes in scheduling because of  
4 this event?

5 A. There were for us, yes.

6 Q. And your office had to cancel events?

7 A. We did. We cancelled the children's event, yes.

8 Q. And how did that make you and your colleagues feel?

9 A. I felt badly that so many folks were feeling  
10 uncomfortable being on campus that day. And I'll tell you --  
11 so it worried me -- all of this worried me, I guess, because I  
12 knew folks were feeling sensitive about their social media. I  
13 knew people who were feeling fear about what can I say and  
14 can't I say as a public employee. I didn't know that when I  
15 spoke privately it might be regarded as somehow representative  
16 of me and my job.

17 And, also, we were hiring at that time. So we had  
18 somebody write to us and say, "I'd like to withdraw my  
19 candidacy for consideration. I don't want to work in a place  
20 that doesn't protect its employees' rights."

21 And the employee who received that email felt, like,  
22 shame on behalf of our university because the email actually  
23 challenged us. It said, "I hope you will be a voice to speak  
24 for people's rights." And, yeah, it made us really sad, I  
25 guess.

1 Q. How do you feel about the university?

2 A. I love the University of Mississippi.

3 So I interviewed in 2017 for a job here, not knowing  
4 anything about it, never having been to Mississippi. And the  
5 people I interviewed with were just incredible. And it wasn't  
6 just Pre-College and Outreach. It was a lot of other units I  
7 met with.

8 And I was a finalist, actually, in another job. I had  
9 forgotten that until just recently. And when I got the job  
10 offer here, I said, no, I don't want to interview at this other  
11 place. I want to go there because I was really interested in  
12 and drawn by the level of commitment this university has to the  
13 pre-college work I do to outreach to youth but also because  
14 this university cares so much about Mississippi and its role as  
15 a public institution.

16 And, like, that was my first impression. I was willing  
17 to move my whole family for that. And it's only deepened as  
18 I've been here. I can tell you there are people that are not  
19 even student-facing in this university that get up every day,  
20 like, excited about that mission. And I -- I love working here  
21 for that reason. I have really enjoyed it.

22 MS. BASS: I tender the witness.

23 MR. WATKINS: No questions for this witness, Your  
24 Honor.

25 THE COURT: Sir, you'll be -- ma'am -- excuse me --

1 you'll be fully and finally discharged. You may remain in the  
2 courtroom if you wish.

3 **THE WITNESS:** Thank you, sir.

4 **THE COURT:** Do you have a short witness?

5 **MS. MILLS:** We have, I believe, at least three more  
6 witnesses, if the Court would like to take a break. I know we  
7 will wrap it up today but not before lunch.

8 **THE COURT:** I think we'll be in recess for lunch. Is  
9 that -- you think our schedule is running okay?

10 **MS. MILLS:** Uh-huh.

11 **THE COURT:** Be in recess until 1:00. Recess until  
12 1:00 for lunch.

13 (LUNCH RECESS TAKEN.)

14 **THE COURT:** Plaintiff may call your next witness.

15 **MS. MILLS:** Your Honor, we call Calvin Wood.

16 **THE COURT:** Very well.

17 (OATH WAS ADMINISTERED BY THE COURTROOM DEPUTY.)

18 **COURTROOM DEPUTY:** Thank you. You may take the  
19 witness stand, please.

20 **CALVIN WOOD, PLAINTIFF'S WITNESS, AFTER BEING DULY SWORN,**

21 **WAS EXAMINED AND TESTIFIED AS FOLLOWS:**

22 **DIRECT EXAMINATION**

23 **BY MS. MILLS:**

24 **Q.** Good afternoon.

25 **A.** Good afternoon.

1 Q. Will you please state your full name for the Court.

2 A. Calvin Granger Wood.

3 Q. Okay. And are you a student at the University of  
4 Mississippi?

5 A. Yes, ma'am.

6 Q. Okay. Will you tell the Court your major and year?

7 A. Yes, ma'am. I'm a senior public policy leadership major  
8 with a double minor in English and southern studies.

9 Q. Okay. And what's your hometown?

10 A. I'm originally from Franklin, Tennessee.

11 Q. Okay. And were you a student at the University of  
12 Mississippi last semester?

13 A. Yes, ma'am.

14 Q. Okay. I want to take you back to September, specifically  
15 September 11. Did you have classes that day?

16 A. Yes, ma'am, I did.

17 Q. Okay. That was a Thursday.

18 A. We've been through it. But, yes, I did.

19 Q. Okay. And we're here because of a social media post by  
20 Lauren Stokes. Do you know Lauren Stokes personally?

21 A. I do not. I've never met her, I don't think.

22 Q. Okay. How -- do you know that name?

23 A. I'm familiar with the name now.

24 Q. Okay. And how do you know the name?

25 A. I found out about her when I received an email from the

1 chancellor that said that she -- that somebody had been fired.  
2 And then I, you know, went on Google and went on, you know,  
3 student social media apps and figured out from there.

4 Q. How easy was that?

5 A. It was pretty easy at that point.

6 Q. Okay. And I'm going to show you what's already been  
7 marked as Exhibit 9. Is this the email you received?

8 A. Yes, ma'am. This looks right.

9 Q. Okay. Have you ever received an email like this from the  
10 chancellor?

11 A. In my four years at Ole Miss, I can't think of anything  
12 similar to this.

13 The most similar I can think of is following the protest  
14 for Palestine a couple of years ago, and which the chancellor  
15 emailed the student body as a result of a student who had gone  
16 viral for -- or some students who had gone viral for shouting  
17 racial slurs and offensive dances at the protestors.

18 The difference between that one and this one, though, I  
19 think, would be he didn't -- he was very vague in that one. He  
20 didn't, you know, mention any investigations or disciplinary  
21 actions or any -- anything like that.

22 Q. Okay. And what -- what does this one do?

23 A. I mean, it calls out a specific person. Even though he  
24 doesn't name the person, it sent a message to the entire  
25 campus.

1 Q. Okay. Before you got this email, who was talking about  
2 Lauren Stokes on campus?

3 A. I don't remember anybody talking about her. And I -- I'm  
4 somebody who goes to the campus worker union meetings and stuff  
5 like that. These sorts of things -- usually I know about them,  
6 and this hadn't crossed any of our radars.

7 Q. Okay. After this e-mail, who was talking about Lauren  
8 Stokes?

9 A. Everybody was. They brought it up in class. Our  
10 professors brought it up. We were discussing it in my club  
11 organizations. It was -- it was a real huge moment on campus,  
12 I think.

13 Q. And what moment specifically -- the -- what -- what was  
14 the big deal?

15 A. The fact that a professor -- or a staff member had been  
16 fired for something she said outside of, you know, official  
17 university communications.

18 Q. I want to fast-forward to October 29. And that's the  
19 date of the Turning Point Charlie Kirk event on campus.

20 How did you learn about the Charlie Kirk event?

21 A. I had known about it well before any of those events had  
22 happened, either from social media or from colleagues who  
23 organized -- or student organizers with me. When we heard  
24 about the events on the 10th and the 11th of September, we  
25 scrapped our plans, and we were discussing having some kind of

1 protest or some form of that. And we abandoned that but, yeah.

2 Q. Okay. October 29th was a Wednesday. Okay. How many  
3 classes were cancelled that Wednesday?

4 A. I didn't attend any classes. My morning French class --  
5 my classmates had begged all week for us to not have class that  
6 day because they were worried about traffic or parking or just,  
7 like, the looming fear of violence and uncivility on campus.  
8 My English class early afternoon had been made virtual. And I  
9 got permission ahead of time to miss my public policy class,  
10 which I figure not many people attended because it coincided  
11 with the event.

12 As I was walking around campus, it was really clear to me  
13 that no classes were happening. The only people on campus were  
14 in Trump hats and TPUSA shirts and on their way to the event  
15 where there were reporters.

16 Q. Okay. What did you do that day?

17 A. I was with the College Democrats organizing our town hall  
18 event that happened at the same time. So I arrived around  
19 10:00 in the morning. And I was putting up flyers, doing  
20 interviews with reporters, and then finalizing my -- my  
21 speeches for the event and doing sound checks and stuff like  
22 that.

23 Q. And how did that event go?

24 A. It went all right.

25 Q. Okay. What did you as students know about the

1 chancellor's support of the Charlie Kirk event?

2 A. It was definitely very clear to me that he had a part in  
3 that. My understanding is that he works very closely with  
4 Turning Point's student organization and had a very, very close  
5 role in championing that event. The president of TPUSA has  
6 told me very clearly how close she is. I think her words are,  
7 "He's my buddy."

8 I think, even aside from that, the -- the evidence that  
9 he was closely involved with it was obvious -- or at least that  
10 the administration was. You know, that was an enormous  
11 logistical hurdle, from changing traffic and parking and  
12 working with Secret Service and all that stuff. And, you know,  
13 the -- it was more coordination than they have ever, ever in my  
14 time here even communicated with College Democrats or Southern  
15 Progressives Alliance or any of the other organizations I'm  
16 involved with.

17 The most they did to support our event was sending an IT  
18 guy to set up the projector before the event. And I didn't  
19 even know that renting out the Pavilion was an option for  
20 student organizations.

21 Q. Okay. Did you see any news reports about the event after  
22 it happened?

23 A. Yes, ma'am.

24 Q. Okay.

25 **MS. MILLS:** Mr. Mayo, I would like to show the

1 witness -- this is from *The Daily Mississippian*.

2 (CONFERRING OFF THE RECORD.)

3 **MR. MAYO:** Your Honor, we don't have any objection for  
4 purposes of this hearing. We do reserve the right to object to  
5 its admissibility down the road, but for purposes of today's  
6 hearing, we have no objection.

7 **MS. MILLS:** Okay. Thank you.

8 **THE COURT:** Very well. At any subsequent trial, you  
9 may have an objection, but you don't have at this point --

10 **MR. MAYO:** Yes, Your Honor.

11 **THE COURT:** -- this proceeding? Very well.

12 **MS. MILLS:** Thank you.

13 **THE COURT:** For purposes of this proceeding, that -- I  
14 don't know what you've got.

15 **COURTROOM DEPUTY:** P-10 will be the number, Judge.

16 **MS. MILLS:** Exhibit 10.

17 **COURTROOM DEPUTY:** Yes. Exhibit 10.

18 **THE COURT:** Okay. Exhibit P-10. Is that correct?

19 **COURTROOM DEPUTY:** Yes, sir.

20 **THE COURT:** Okay.

21 (EXHIBIT NUMBER P-10 ADMITTED INTO EVIDENCE.)

22 **BY MS. MILLS:**

23 **Q.** Okay. And, Calvin, I'm showing you here on this screen a  
24 document. Can you tell us what this is?

25 **A.** It looks like an Instagram post from *The Daily*

1 *Mississippian* quoting the chancellor and how he believes that  
2 the university's trajectory played a part in why J. D. Vance  
3 appeared here.

4 Q. Okay. And this is about the Charlie Kirk event?

5 A. Yes, ma'am.

6 Q. Okay. And this will be one composite Exhibit 10; so I'm  
7 going to show you another document. Okay? And have you seen  
8 this before?

9 A. I have.

10 Q. And what is this?

11 A. It's another article from WLBT about "The Charlie Kirk  
12 Effect." And there's a picture of -- I see Tate Reeves.

13 Q. Actually, hang on just a second. I have this in color.

14 A. Oh, that's better.

15 Q. Okay. Go ahead.

16 A. I see Governor Reeves. And I believe that to be the  
17 chancellor with a sign that says --

18 Q. Oh, hang on. I can help.

19 A. Oh, yeah. Oh, much better.

20 -- "I am Charlie Kirk."

21 Q. Okay. Thank you.

22 And my question for you about this is simply, how does  
23 this -- these photos, the chancellor's quote, how does that  
24 make you feel?

25 A. I find it incredibly offensive to think how little



1 Q. Okay. Make sure I get that right.

2 Mr. Wood, you talked a minute ago about the chancellor's  
3 involvement with the event that you were speaking of, but I  
4 think you also said that you never personally spoke with the  
5 chancellor about that; is that correct?

6 A. I heard from the president of TPUSA how closely and how  
7 often she meets with him and how, when she brought up the idea  
8 of bringing the Vice President, he was all for it and that he  
9 championed it single-handedly. I haven't spoken to him  
10 personally.

11 Q. What do you mean when you say "championed it  
12 single-handedly"?

13 A. You'd have to ask her.

14 Q. Okay. So this is just something you heard from another  
15 person?

16 A. Yeah. But she speaks her mind very freely.

17 Q. The -- you mentioned the Turning Point USA event. Now,  
18 Turning Point USA is a student organization on campus; is that  
19 correct?

20 A. It's a chapter of a national organization but, yes, sir.

21 Q. Okay. And that was the sponsor of the event that you  
22 were talking about; correct?

23 A. As I recall, the Declaration of Independence Center at  
24 the university, which provides classes and a minor program for  
25 students, their logo was on the poster. So I would say

1 cosponsors maybe.

2 Q. Maybe? You just know because you saw a logo? Is that  
3 what you're basing that on?

4 A. I mean, their logo was on the poster --

5 Q. Okay.

6 A. -- so, yes, sir.

7 Q. Okay. And J. D. Vance, at the time of the -- this event,  
8 was obviously the sitting Vice President of the United States;  
9 correct?

10 A. Yes, sir.

11 Q. Okay. It's not surprising that there were a lot of  
12 logistical issues when the sitting Vice President of the United  
13 States comes to campus; correct?

14 A. I don't think it's common for a university to host a  
15 rally on campus on a Wednesday of the semester.

16 Q. That's not the question I asked you.

17 It's not surprising to you that there would be logistical  
18 issues associated with the visit of a sitting vice president to  
19 a college campus, is it?

20 A. I think it's surprising to me that the university would  
21 allow those hurdles to be -- to occur.

22 Q. Do you have any knowledge about what the university did  
23 and didn't allow to occur?

24 A. I have knowledge of what they did allow.

25 Q. Do you have any knowledge about what the Secret Service,

1 as opposed to the university, imposed on campus?

2 A. Can you repeat that question?

3 Q. Sure. Do you have any knowledge about the -- what the  
4 Secret Service did to impose these logistical issues on campus  
5 as opposed to the university?

6 A. I'm not sure I understand the question.

7 Q. Okay. Do you know anything about the Secret Service and  
8 their visit to the university around the time of this event  
9 where the Vice President visited?

10 A. Aside from my general familiarity with how Secret Service  
11 works in these sorts of visits from my time working on  
12 campaigns, I can't say for certain what I knew about this event  
13 specifically.

14 Q. Okay. But based on that information that you have from  
15 your time working on campaigns, the Secret Service provides  
16 protection services for the Vice President; right?

17 A. Sure.

18 Q. Okay. And it's not surprising that there would be an  
19 increased law enforcement presence on campus when the Vice  
20 President is visiting; correct?

21 A. I think it's surprising to me that that happens on that  
22 side of campus, and during our event, we were made to pay for  
23 our own security.

24 Q. Did the Vice President of the United States come to your  
25 event?

1 A. We had plenty of important people, and we also were  
2 actively sending the UPD threats that we were seeing on  
3 campus -- or on social media. So I would say it certainly  
4 warranted more presence than something on the burden of the  
5 student organization.

6 Q. So the question -- the answer to the question is no;  
7 correct?

8 A. Repeat the question.

9 Q. Sure. The question is was the Vice President of the  
10 United States at your event?

11 A. Plenty of students who were facing threats alongside  
12 elected officials were at our event.

13 Q. Okay. Again, not the question I asked.

14 Was the Vice President of the United States at your  
15 event? Yes or no?

16 A. Was not. I don't think that's the only person who  
17 warrants protection, though.

18 MR. WATKINS: Thank you, Your Honor.

19 MS. MILLS: Just one follow up.

20 THE COURT: Okay. Redirect.

21 REDIRECT EXAMINATION

22 BY MS. MILLS:

23 Q. Did a Supreme Court Justice speak on campus recently?

24 A. Yes, ma'am.

25 Q. Okay. Who was that?

1 A. Ketanji Brown Jackson.

2 Q. Okay. And did campus shut down that day?

3 MR. WATKINS: Your Honor, I think that's outside the  
4 cross of -- scope of cross.

5 MS. MILLS: You asked about the Vice President and his  
6 security and what it required. I think this is relevant.

7 THE COURT: Okay. I'll overrule the objection for  
8 purposes of this hearing.

9 BY MS. MILLS:

10 Q. Did campus shut down for that event?

11 A. Not at all. The event with the Justice was almost  
12 secretive. I found it really difficult to figure out how I  
13 could get in. It wasn't publicized whatsoever. There were no  
14 pyrotechnics. I had to apply to be accepted once I finally was  
15 invited to go, and I was vetted by the Secret Service.

16 Q. Okay.

17 MS. MILLS: Thank you, Calvin. No further questions.  
18 I appreciate you.

19 And I don't expect to hear from him again today; so he  
20 may remain in the courtroom?

21 MR. MAYO: It's fine with me.

22 MS. MILLS: Thank you.

23 THE COURT: Okay. Sir, you are fully and finally  
24 discharged.

25 MS. MILLS: We call Elizabeth Wildman.

1           **THE COURT:** Very well.

2           (OATH WAS ADMINISTERED BY THE COURTROOM DEPUTY.)

3           **COURTROOM DEPUTY:** You may take the stand, please.

4           **ELIZABETH WILDMAN, PLAINTIFF'S WITNESS, AFTER BEING DULY SWORN,**

5                           **WAS EXAMINED AND TESTIFIED AS FOLLOWS:**

6   **DIRECT EXAMINATION**

7           **BY MS. MILLS:**

8           **Q.**     Good afternoon.

9           **A.**     Hi. Good afternoon.

10          **Q.**     Okay. Will you please tell the Court your full name.

11          **A.**     Yes. Kathryn Elizabeth Wildman.

12          **Q.**     And where are you from, Elizabeth?

13          **A.**     I'm from Laurel, Mississippi.

14          **Q.**     Okay. And are you a student at the University of  
15          Mississippi?

16          **A.**     Yes.

17          **Q.**     Okay. Will you tell the Court your major and your year?

18          **A.**     Yeah. I'm a public policy leadership major, and I'm a  
19          senior.

20          **Q.**     Okay. And will you share with the Court some of your  
21          activities on campus?

22          **A.**     Yeah. I'm the president of UM Democrats. I'm also in  
23          the Trent Lott Leadership Institute and Honors College.

24          **Q.**     Okay. So you were a student last semester; correct?

25          **A.**     Yes.

1 Q. Okay. I want to talk about September 11.

2 A. Okay.

3 Q. Did you have classes that day?

4 A. Yes.

5 Q. Okay. And we're here because of a social media post by  
6 Lauren Stokes. Do you personally know Lauren Stokes?

7 A. No.

8 Q. Okay. But do you now know who Lauren Stokes is?

9 A. Yes.

10 Q. Okay. And how do you know that?

11 A. Yeah. I didn't know who she was until the email went out  
12 from the chancellor. And, then, even when he sent it out, I  
13 wasn't sure who had posted or what he was referring to.

14 And, then, later that night, some friends and I had kind  
15 of been talking about it, and one of my friends saw her post on  
16 Facebook and someone talking about it. And, then, that's when  
17 I learned who she was.

18 Q. Okay. I'm going to show you what's already been marked  
19 as Exhibit 9, and I'm going to ask you if this is the email  
20 that you received.

21 A. Yes.

22 Q. Okay. How common is it to receive an email like this  
23 from the chancellor?

24 A. I've never received an email like that. When I got it, I  
25 honestly thought it was kind of random that he was, you know,

1 sending a mass email about someone being fired at the school.

2 Q. Okay. Before this email, who was talking about Lauren  
3 Stokes and her social media post on campus?

4 A. No one. Yeah. Like I said, I didn't even know who she  
5 was; so -- yeah.

6 Q. Okay. After this email, who was talking about Lauren  
7 Stokes on campus?

8 A. Yeah. Everyone was talking about it, at least in my  
9 circles, yeah. After that, we were kind of trying to figure  
10 out what was going on, who had posted it, and, then, that sort  
11 of thing; so -- yeah.

12 Q. And what was your reaction to this email?

13 A. I mean, when I first got it, I, like I said, thought it  
14 was kind of random. But once I realized that the post was  
15 something about -- against Charlie Kirk and, you know, the  
16 conservative movement, it kind of made sense. I mean, we all  
17 kind of know where the school stands in terms of politics; so  
18 it wasn't surprising.

19 Q. Okay. I want to fast-forward now to October --  
20 October 29, the Turning Point Charlie Kirk event.

21 A. Uh-huh.

22 Q. How did you learn about that event?

23 A. Yeah. So I actually didn't know that Charlie Kirk had  
24 plans to come to Ole Miss on his tour until he died. And,  
25 then, I, you know, heard about the tour and that he was

1 supposed to have come here.

2 And, then, the day that they announced that -- there had  
3 been rumors about there being a bigger speaker. The day they  
4 announced that it was J. D. Vance, we actually ended up having  
5 a, like, rapid response call with a bunch of people kind of  
6 discussing how to move forward. And I ended up planning an  
7 event with the College Dems; so --

8 Q. Okay. And how did that event go?

9 A. Yeah. It went really well. We had some really cool  
10 speakers, some online and Zoom and some in person. But it  
11 was -- it was a little hard to plan at first.

12 And we, honestly, had no clue how many people were going  
13 to show up because, when I reached out to a lot of  
14 organizations that we normally partner with and that have done  
15 stuff with us and that is similar in the past few years, a lot  
16 of people were -- in organizations were nervous to partner with  
17 us, to put their name on it, organizations like the Black  
18 Student Union and NAACP, because they felt like they already  
19 had a lot of heat on their organizations because of all the DI  
20 changes and things on campus. And they didn't want to  
21 encourage their members to even go because they were scared  
22 that something might happen to them if they did.

23 So it was -- yeah. It was a little hard to kind of pull  
24 together, but it ended up turning out good; so --

25 Q. Great. I'm glad about that. And did you read any news

1 reports about the event after the fact?

2 A. Yeah, I did. I did read some things. And I had been  
3 interviewed about some different things as well. So I read  
4 several articles about it, yeah.

5 Q. I want to show you what's already been admitted. It's  
6 composite Exhibit 10.

7 A. Okay.

8 Q. And do you read *The Daily Mississippian*?

9 A. Yeah.

10 Q. Okay. And I just have a snippet here. If you don't  
11 mind, look at that. And have you seen this before?

12 A. Yes. Yeah.

13 Q. Okay. And what is this?

14 A. Yeah. It's a post by *The Daily Mississippian* about the  
15 event that happened, yeah.

16 Q. Okay. And what does it share?

17 A. Oh, let's see. Yeah. This is a direct quote from Glenn  
18 Boyce.

19 Q. Okay. And how did you interpret his commentary on the  
20 event?

21 A. Honestly, his commentary on the event has kind of been --  
22 this is kind of, like, a slap in the face. I mean, you know,  
23 taking -- being excited about, you know, so much national  
24 attention because of a specific political belief.

25 I've been, you know, working in a Democrat organization

1 on campus for years, and I've felt little to no support from  
2 the university. So, you know, just kind of having that  
3 confirmed in the way that he talks about the event, it -- yeah,  
4 it feels like a slap in the face.

5 Q. How did these related events at the university make you  
6 feel about the university?

7 A. Honestly, it makes me scared. I've had a lot of hardship  
8 in the past four years at the university just from, you know,  
9 having a very strong different political belief than, you know,  
10 the majority at the university and my sexual orientation as  
11 well.

12 But the one thing that has helped me through all of this  
13 is, the people I've met and sort of being excluded together, we  
14 kind of create a community. And that has made me, you know,  
15 have friends that I, you know, consider family.

16 And I'm worried that -- people are, you know, scared to  
17 even come to an event or even, you know, have their name on an  
18 event that they didn't have to plan, which, you know, sounds  
19 like the best thing for an organization to do, makes me worried  
20 that people aren't going to want to come here, aren't going to  
21 want to have that community that I've been able to build over  
22 the past few years. And, you know, that's honestly the only  
23 thing that's helped me get through all those hard times.

24 So, yeah, it's scary.

25 MS. MILLS: Okay. Thank you. I pass the witness.

1           **MR. MAYO:** No questions, Your Honor.

2           **MS. MILLS:** You can step down, and you're free to  
3 remain in the courtroom, unless anyone expects to call her  
4 again.

5           **MR. MAYO:** No.

6           **MS. MILLS:** Okay.

7           **THE WITNESS:** Thank you.

8           **THE COURT:** Okay. You are fully and finally  
9 discharged. You may remain in the courtroom, if you'd like.

10          **THE WITNESS:** Okay. Thank you.

11          **THE COURT:** Next witness.

12          **MS. BASS:** We call Lauren Hite, Your Honor.

13          **THE COURT:** Very well.

14          (OATH WAS ADMINISTERED BY THE COURTROOM DEPUTY.)

15          **COURTROOM DEPUTY:** Thank you. Please take the witness  
16 stand.

17           **LAUREN HITE, PLAINTIFF'S WITNESS, AFTER BEING DULY SWORN,**  
18           **WAS EXAMINED AND TESTIFIED AS FOLLOWS:**

19                           **DIRECT EXAMINATION**

20          **BY MS. BASS:**

21          **Q.** Good afternoon, Lauren. Will you state your full name  
22 for the record.

23          **A.** My name is Lauren Hite.

24          **Q.** And, Lauren, are you currently a student at the  
25 University of Mississippi?

1 A. I am.

2 Q. Okay. What are you studying?

3 A. Journalism.

4 Q. Okay. Are you a graduate student or undergraduate  
5 student?

6 A. I'm a first-year graduate student.

7 Q. So you already have your undergraduate degree?

8 A. Uh-huh.

9 Q. And where is that from?

10 A. The University of Mississippi.

11 Q. And were you a student at the University of Mississippi  
12 last semester?

13 A. I was.

14 Q. So, then, let's go back to Thursday, September 11. Can  
15 you remember that date?

16 A. I do.

17 Q. Do you recall whether or not you had classes that day?

18 A. I did have class, yes.

19 Q. Okay. And you know we're here about an individual named  
20 Lauren Stokes and a social media post?

21 A. Yes.

22 Q. Do you know Lauren Stokes personally?

23 A. No, not personally.

24 Q. Did you know anything about Lauren Stokes prior to  
25 September 11th?

1 A. No.

2 Q. Do you now know who Lauren Stokes is?

3 A. Yes.

4 Q. Okay. How did you come to know who she is?

5 A. I found out through the grapevine that she was the  
6 employee that had been fired for the social media post that we  
7 got the email about.

8 Q. How did you learn that an employee had been fired?

9 A. We -- I got the mass email that the chancellor sent out.

10 Q. I'm going to show you what was previously marked as  
11 Exhibit 9. Is this the email you're referencing?

12 A. It is.

13 Q. And that email was sent to you through whatever email you  
14 use for the University of Mississippi?

15 A. Yes.

16 Q. Is this the first email of this kind that you've received  
17 since you've been a student at the University of Mississippi?

18 A. I would say so, yes.

19 Q. Before you received this email and knew about the firing,  
20 was anyone talking about Lauren Stokes?

21 A. No.

22 Q. What about after you received this email? Was anyone  
23 talking about Lauren Stokes then?

24 A. Not immediately after. But once days kind of went on and  
25 people discovered who, then, yes, a little bit.

1 Q. So it was through this email that you believe people  
2 discovered who Lauren Stokes was?

3 A. Yeah. I think people started looking it up.

4 Q. How did this email make you feel?

5 A. I -- I felt like it was pretty shocking, I guess, but not  
6 surprising, I will say, in that it felt like the exact kind of  
7 defense that, I guess, it seemed like the university's values  
8 have been lately. So I wasn't necessarily surprised to get an  
9 email saying don't say things about this person, but I guess I  
10 was kind of surprised that it had been so, like, blatantly, I  
11 felt, taking a side.

12 Q. Let's fast-forward a little bit to October 29. You still  
13 would have been a student?

14 A. Yes.

15 Q. How did you come to learn about the Turning Point event  
16 for that day?

17 A. So I knew about the Turning Point event prior, back when  
18 it was -- I guess when all the regular college tour schedules  
19 were released. There -- it had already been talked about among  
20 students that Turning Point was going to be coming to the  
21 school. We didn't know if they were still going to come after  
22 Charlie Kirk was killed. And, then, people continued to talk  
23 about it once we found out that it was still going to continue.

24 Q. Were classes cancelled on campus that day because of the  
25 event?

1 A. It wasn't cancelled, like, in a widespread, like,  
2 mandatory cancelling, but a lot of professors did cancel their  
3 classes, yes.

4 Q. So what did you do on that day?

5 A. On that day, I did not have class. I only went to work.  
6 The place that I work -- I work in student housing; so I work  
7 in the same community that I live in. So I didn't feel exposed  
8 to go to work. But if I did not live so close to where I  
9 worked, I -- I would have stayed home.

10 Q. Do you feel that the university supported the Turning  
11 Point event?

12 A. Absolutely.

13 Q. Tell me why you say that.

14 A. Their -- the university seemed enthusiastic, I feel. It  
15 was the students -- a lot of students, I felt, that -- were not  
16 happy about the Turning Point event, but I think the university  
17 was focused a lot more on what notoriety could come to us  
18 because of this visit and kind of that "any publicity is good  
19 publicity."

20 And, yeah, I think that they were enthusiastic to have  
21 been, quote, unquote, "the ones chosen by J. D. Vance  
22 especially."

23 Q. In your opinion, how do -- the things that we've talked  
24 about today, the Turning Point event, Lauren Stokes being  
25 fired, how does that make you feel about the university?

1 A. I'm disappointed because I came to Ole Miss in 2020, and  
2 a lot of people from my hometown kind of were questioning why  
3 I, as a black student, would go to Ole Miss. And up until  
4 2024, I had had nothing but positive experiences and nothing  
5 that was negative -- what is related to anything due to race or  
6 sexuality or anything like that.

7 So now -- once this all began -- I had intended to do two  
8 master's programs at the university. After this happened, I  
9 felt that I did not want to do a second master's. I just want  
10 to finish after my first. It just doesn't feel like it's a  
11 place where I could really prosper anymore and, like, feel, I  
12 guess, comfortable and supported by the administration and the  
13 rules and regulations that are set up by the school.

14 Q. So your feelings about the university have changed?

15 A. Oh, absolutely.

16 MS. BASS: I tender the witness.

17 MR. MAYO: No questions, Your Honor.

18 THE COURT: Okay. Please, ma'am, you are fully and  
19 finally discharged. You may go, or you may stay in the  
20 courtroom, whichever you prefer.

21 Call your next witness.

22 MS. MILLS: Your Honor, we intended to call the  
23 defendant, Glenn Boyce, but he's not here that I'm aware. I  
24 don't know if Counsel intends to make him available.

25 MR. MAYO: Did you serve him with a subpoena?

1           **MS. MILLS:** Well, he's the defendant. I kind of  
2 thought he would be here. But if he's not going to be  
3 here and -- is that a no?

4           **MR. MAYO:** He's not here right now.

5           **MS. MILLS:** Okay. I can wait to see if he appears for  
6 the defense. If he doesn't, I would ask for an opportunity to  
7 address that at the end of the hearing.

8           Otherwise, we rest.

9           **THE COURT:** Very well.

10           Okay. As I understand, you rest with the exception of  
11 you maintaining your privilege or right to call the defendant.  
12 With that exception, you rest.

13           **MS. MILLS:** Thank you, Your Honor.

14           **THE COURT:** Okay. You have any problem with that,  
15 Mr. Mayo?

16           **MR. MAYO:** Well, we would -- I'm not sure how the  
17 Court is going to deal with that. But if the defendant  
18 testifies, we may have additional proof to put on after him.  
19 We want to reserve the right to do that. But he was not  
20 subpoenaed to be here. He has submitted a declaration. There  
21 was no request for prehearing discovery.

22           So, Your Honor, there's an opportunity -- if the  
23 plaintiff wanted to take discovery, she could have asked for  
24 it. She did not. She did not subpoena him to be here. So I'm  
25 not sure why the proof would be left open.

1           **MS. MILLS:** May I respond?

2           **THE COURT:** Yes.

3           **MS. MILLS:** Discovery was stayed by their motion for  
4 qualified immunity. I actually asked for the e-mails and  
5 telephone call logs that they reference in their filings. I  
6 did not receive those. I had to file a public records request  
7 for them. I filed that public records request on January 8.  
8 Yesterday I received an email from the university that, if I  
9 would mail it a check for \$690, they would send me the records  
10 later.

11           So, Your Honor, I have -- I have received no  
12 information from the university, and I've proceeded as if I  
13 would not.

14           Now, as to the defendant's availability today, he is  
15 the named defendant. When we discussed these hearing dates, in  
16 addition to other reasons, I was told that we would have to  
17 move the hearing so that witnesses could be here, which I  
18 presumed meant the defendant himself.

19           But be that as it is, it's fine by me. The  
20 university -- it has the burden of proof here to establish a  
21 disruption. If it intends to rely solely on Glenn Boyce's  
22 declaration, then, I would simply be -- ask -- I would simply  
23 ask for permission to make a proffer as to what we would have  
24 asked him if he would have been here today and to show the  
25 Court the exhibits we would have used.

1           **THE COURT:** Let's see if the defendant attends the  
2 hearing today.

3           Do you intend to call him, Mr. Mayo?

4           **MR. MAYO:** Your Honor, can we have just a couple of  
5 minutes to visit?

6           **THE COURT:** Yeah. Sure.

7           (CONFERRING OFF THE RECORD.)

8           **MR. MAYO:** Your Honor, we intend to rely on the  
9 declarations that have already been submitted to the Court.

10           And we -- also, Your Honor, we just received for the  
11 first time today several exhibits that we have not previously  
12 been provided, which I'm not saying she had to provide them to  
13 us, but we would like an opportunity to get a copy of those.  
14 Some of them, we don't have a copy of them.

15           And we'd like to have a chance to submit some  
16 post-hearing briefing in light of the testimony from today and  
17 these exhibits that we've just seen for the first time. And we  
18 can do that by Friday of next week, Your Honor.

19           **THE COURT:** Well, let's do this. The plaintiff has  
20 announced that she rests with the one exception, and that is to  
21 call the defendant as a witness.

22           Now, do you have proof you wish to put on at this  
23 juncture?

24           **MR. MAYO:** Not at this juncture, Your Honor. We will  
25 rely on the declarations that were submitted.

1           **THE COURT:** How does that pronouncement affect your  
2 position, Ms. Mills?

3           **MS. MILLS:** Well, I -- if this is the close of the  
4 hearing and it will not be dragged out by further briefing on  
5 exhibits we may have used today, many of which are e-mails that  
6 came from the university itself, I would say fine. Let's end  
7 it, and it is what it is.

8           The university has the burden of proof. It hasn't  
9 produced any of the items on which it relied in Glenn Boyce's  
10 declaration. None of the e-mails. None of the telephone  
11 calls. It won't tell us who the important public officials  
12 were who allegedly called and told Glenn Boyce that he needed  
13 to fire Lauren Stokes.

14           Accepting that it's the university's burden of  
15 proof -- and, in my opinion, it has not carried it. And the  
16 fact that he hasn't even shown up underlines that -- I'm  
17 satisfied if this is the conclusion of the hearing.

18           What I do not want is now -- the university, having no  
19 witnesses, having put off this hearing until February 13  
20 because its counsel and its witnesses could not be available,  
21 to now say we need an opportunity to address the plaintiff's  
22 case.

23           And so I leave it to the Court what to do. If the  
24 Court allows additional briefing, of course, I would like an  
25 opportunity to respond.

1           **MR. MAYO:** Your Honor, my suggestion was simply that  
2 we do simultaneous briefing due one day next week just to --  
3 we've had six or seven witnesses today, and I think it would be  
4 worth -- beneficial to the Court to have some briefing. I'm  
5 not asking for a long brief but just that opportunity in light  
6 of what happened today.

7           And I would like to get a copy of some of these  
8 exhibits which are not university-generated documents which we  
9 have not seen before, including the audio of the telephone  
10 call.

11           **THE COURT:** Okay. Let me take -- be in recess for 15  
12 minutes to consider the pronouncements.

13           Okay. Court is in recess for 15 minutes.

14           (RECESS TAKEN.)

15           **THE COURT:** In the case sub judice, the plaintiff has  
16 announced that she rests with the exception of the plaintiff  
17 reserves the right to call the defendant -- the named  
18 defendant, the chancellor of the university, Mr. Glenn Boyce,  
19 if she elects to do so.

20           Now, it's been my practice over the years at a bench  
21 trial, a bench setting, I generally ask for findings of fact,  
22 conclusions of law. In this case, the Court has relied upon  
23 your briefs that have been submitted prior to trial.

24           Now, I also follow the practice of allowing the  
25 parties to supplement their briefs based on what's been

1 introduced in a hearing. And I'm going to do that in this  
2 case. I'm going to permit the parties to simultaneously brief  
3 this matter and submit briefs to the Court on or before  
4 February the 20th. That's a week from today.

5 Now, if the movant, Ms. Stokes, desires to call the  
6 defendant as a witness, I'll ask that if -- you issue a  
7 subpoena for him to appear next Friday. Is that -- Mr. Mayo?

8 **MR. MAYO:** Yes, Your Honor. I don't know where the  
9 chancellor will be next Friday, but I can find out.

10 **THE COURT:** Well, find out. If the movant intends to  
11 call him as a witness, she will be permitted to issue a  
12 subpoena for him. And I assume that he wouldn't be very hard  
13 to find.

14 Okay. Do we have any question? Submit briefs or  
15 supplemental briefs by next Friday.

16 **MS. MILLS:** Yes, Your Honor. Thank you.

17 And may I make just a few summary remarks?

18 **THE COURT:** Today?

19 **MS. MILLS:** Yes, sir.

20 **THE COURT:** Yes. I'll permit that, yes, to make a  
21 final argument, both of you, yes. Sure.

22 **MS. MILLS:** Thank you, Your Honor.

23 I just want to summarize the evidence. You know,  
24 Lauren Stokes's post was after work. It was private. Any  
25 disruption was external and fleeting. And doxxers caused it,

1 not Lauren Stokes.

2           Lauren Stokes did not disrupt anything on campus on  
3 September 11. By contrast, the Turning Point Charlie Kirk  
4 event on October 29 did disrupt a lot. Classes were cancelled,  
5 and students didn't want to come to campus.

6           When Chancellor Glenn Boyce fired Lauren, he sent an  
7 email to all faculty, staff, and students that operated kind of  
8 like an Amber Alert. It communicated, Say something bad about  
9 Charlie Kirk at your peril. Boyce established an institutional  
10 viewpoint. And that viewpoint is Charlie Kirk is someone to be  
11 mourned.

12           Now, I want to be very clear that we are not here -- I  
13 hope no one took away from today our intent to say that that  
14 viewpoint is wrong. We're not trying to argue that anyone is  
15 not entitled to that. We're not trying to say one viewpoint  
16 should be favored over another. That's not it.

17           We're here to say that the university cannot establish  
18 an institutional viewpoint on an issue of the day and then,  
19 when faced with a dissenting employee, portray the disagreement  
20 itself as evidence of disruption. And that's not Alysson Mills  
21 saying that. That's Supreme Court Justice Clarence Thomas.  
22 And that's not very long ago. That's last summer.

23           And so we believe that, number one, Lauren Stokes was  
24 not disruptive. And that's enough. But, number two, the  
25 chancellor established an institutional viewpoint here. And so

1 what you have is you have political speech, which is the most  
2 protected speech. It has the highest value under the First  
3 Amendment. And you have viewpoint discrimination, which is the  
4 most dangerous kind.

5 And in the *Pickering* balancing test, that means that  
6 the interest in the speech is exceedingly high. In fact, I  
7 would say it's as high as it gets. And that means that the  
8 university, to justify this, has a very, very high burden of  
9 proof, and it has to prove disruption. And it hasn't.

10 And that's -- that's all we came today to establish.  
11 I hope that the supplemental briefing is not an opportunity to  
12 offer additional evidence. But if there is additional evidence  
13 offered, I would ask for an opportunity to meet it.

14 And I really appreciate the Court's time today. We  
15 all appreciate the Court moving this hearing to Oxford, which I  
16 know has been an inconvenience for the Court and its entire  
17 staff, but it has made it a lot easier for us and for the  
18 community.

19 Thank you.

20 **THE COURT:** Okay. Mr. Mayo.

21 **MR. WATKINS:** Your Honor, if it please the Court,  
22 we'll reserve final argument for the briefing that the Court  
23 has asked for.

24 **THE COURT:** Okay, Mr. Watkins. Very well.

25 The parties will have until and through February

1 the 20th to submit supplemental briefs.

2 Very well. That's the ruling of the Court.

3 Court's adjourned.

4 (PROCEEDING WAS CONCLUDED AT 2:08 P.M.)

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

CERTIFICATE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I, Phyllis K. McLarty, Federal Official Realtime Court Reporter, in and for the United States District Court for the Northern District of Mississippi, do hereby certify that pursuant to Section 753, Title 28, United States Code, that the foregoing 104 pages are a true and correct transcript of the stenographically reported proceedings held in the above-entitled matter and that the transcript page format is in conformance with the regulations of the Judicial Conference of the United States.

Witness my hand, this 15th day of February, 2026.

/s/ Phyllis K. McLarty  
PHYLLIS K. McLARTY, RDR, FCRR, CCR #1235  
Federal Official Court Reporter