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

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

ORAL and VIDEOTAPE DEPOSITION OF
SHERIDAN TITMAN
January 12, 2024
Volume 1

ORAL DEPOSITION OF SHERIDAN TITMAN, Volume 1,
produced as a witness at the instance of the Plaintiff,
and duly sworn, was taken in the above-styled and
numbered cause on January 12, 2024, from 9:02 a.m. to
4:06 p.m., before Dana Shapiro, CSR, in and for the
State of Illinois, reported by machine shorthand, at
100 Congress Avenue, Suite 1200, Austin, Texas 78701,
pursuant to the Federal Rules of Civil Procedure and
any provisions stated on the record or attached hereto.

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A P P E A R A N C E S

FOR THE PLAINTIFF:

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ALSO PRESENT:

MR. RICHARD LOWERY,
MR. RYAN POLANCO, the videographer

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1 Q. It says --

2 A. Andres Almazan.

3 Q. Yes. It says it's from Andres Almazan to
4 you and Aydogan Alti.

5 A. I don't recall.

6 Q. Let's go through that email that's been
7 marked as Exhibit 4. You have had a chance to review
8 it; is that correct?

9 A. Yes.

10 Q. It was -- the email was sent by Andres
11 Almazan on August 8, 2022; is that correct?

12 A. Yeah.

13 Q. This would have been the day before the
14 discussion you had with Lillian Mills on August 9 that
15 you don't recall the content of; is that correct?

16 A. I don't recall this email either.

17 Q. You don't have recollection about the
18 contents of that email?

19 A. No, I don't remember.

20 Q. Who is Andres Almazan?

21 A. He's a faculty member in finance.

22 Q. At the McCombs School?

23 A. Yes.

24 Q. Is he acquainted with Jay Hartzell?

25 A. Yes.

1 Q. How do you know that?

2 A. Because Jay was part of our finance faculty
3 also.

4 Q. Are Jay and Andres friends?

5 A. They are colleagues.

6 Q. What are Andres' politics?

7 A. They are left of Richard's.

8 Q. Have Andres and Richard clashed before?

9 A. I don't think they like each other.

10 Q. Why do you say that?

11 A. Richard has told me he doesn't like Andres.

12 Q. Has he explained why he doesn't like
13 Andres?

14 A. Nothing too specific.

15 Q. Has Andres ever expressed an opinion about
16 Richard that you can recall?

17 A. I don't think Andres likes Richard.

18 Q. Why would you say that?

19 A. I don't know. I believe he's told me he
20 doesn't like Richard.

21 Q. Has he explained why? Does he think
22 Richard is a fire breathing, right wing libertarian?

23 A. It's not a political thing.

24 Q. So what's your sense of what he said about
25 why he doesn't like Richard?

1 A. I don't recall anything specific.

2 Q. Do you recall any particular issue that
3 they had a disagreement on, like on a faculty committee
4 or something like that?

5 A. I just don't recall anything specific.

6 Q. How about Aydogan Alti, who is he?

7 A. He's also on the faculty.

8 Q. Of the Finance Department?

9 A. Yes.

10 Q. Where is he politically relative to
11 Richard?

12 A. My guess he's to the left of Richard.

13 That's more of a statement on Richard than on Alti.

14 Q. There is a lot of real estate to the left
15 of Richard?

16 A. Yes, most of us are to the left of Richard.

17 Q. Have Mr. Alti and -- or Professor Alti and
18 Richard clashed on any issues at the McCombs School?

19 A. Not to my knowledge.

20 Q. Has Professor Alti expressed any opinions
21 about Richard or Richard's political views?

22 A. Not about the political views, but I don't
23 think he likes Richard.

24 Q. What makes you say that?

25 A. I don't know. Nothing specific. That's my

1 what it says.

2 BY MR. KOLDE:

3 Q. Don't worry about the lawyers arguing. You
4 may answer.

5 A. You could speculate that what you are
6 saying is correct.

7 Q. It's a reasonable interpretation of what he
8 said?

9 MR. DOW: Objection, form, speculation.

10 BY MR. KOLDE:

11 Q. You may answer.

12 A. It's a plausible interpretation.

13 Q. I have some more exhibits I want to discuss
14 with you, but I did want to go back to this issue of
15 the relationship between Jay Hartzell and Alti Aydogan.
16 Are they friends?

17 A. They are colleagues.

18 Q. Did they go to strip clubs together?

19 A. I don't know.

20 Q. Didn't they bring you a hat from a strip
21 club?

22 A. Bring me a hat from a strip club? I once
23 got a hat from a place called Rachel's or something.

24 Q. Is that a strip club?

25 A. I don't know.

1 Q. You will have to excuse me. I don't know
2 the strip club scene in Austin or anywhere.

3 A. I don't think it was from Austin.

4 Q. But it was a strip club hat?

5 A. It was nothing on the hat that said this is
6 a strip club hat.

7 Q. You knew it to be a strip club hat?

8 A. I think somebody told me. I didn't know it
9 myself.

10 Q. It was given to you by Jay or by Alti
11 Aydogan?

12 A. Probably by Jay.

13 Q. Aydogan Alti. I'm sorry. I'm reversing
14 those names. Probably by Jay?

15 A. Yes.

16 Q. He had gone -- he told you he had gone to
17 the club with Aydogan?

18 A. I don't recall Alti being involved, but --
19 I had some politically incorrect hats, just hats that I
20 like to wear. So they thought I would like the hat.

21 Q. It wasn't something about the name Rachel?

22 A. I don't think so.

23 Q. Have you heard or seen that Richard Lowery
24 appeared on the Richard Hanania podcast on July 18,
25 2022?

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Defendants.)

REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
SHERIDAN TITMAN
January 12, 2024

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

That the witness, SHERIDAN TITMAN, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

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

I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was
taken, and further that I am not financially or

1 otherwise interested in the outcome of the action.

2 Certified to by me this January 26, 2024.

3 *Dana Shapiro*

4
5 DANA SHAPIRO, Illinois CSR 84-3597
6 CSR Expiration: 5/31/25
7 Illinois Certified Shorthand Reporter
8 Registered Agent Solutions, Inc.,
9 A Lexitas Company, Firm No. 17
10 5301 Southwest Parkway
11 Corporate Center One, Suite 400
12 Austin, Texas 78735
13 888-893-3767
14 Expires: 1/31/2025
15
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1 COUNTY OF TRAVIS)

2 STATE OF TEXAS)

3 I hereby certify that the witness was notified on
4 _____ that the witness has 30 days
5 after being notified by the officer that the transcript
6 is available for review by the witness and if there are
7 changes in the form or substance to be made, then the
8 witness shall sign a statement reciting such changes
9 and the reasons given by the witness for making them;

10 That the witness' signature was/was not returned
11 as of _____.

12 Subscribed and sworn to on this _____ day of
13 _____, 20____.

14 *Dana Shapiro*

15 _____
16 DANA SHAPIRO, Illinois CSR 84-3597
17 CSR Expiration: 5/31/25
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