

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

RICHARD LOWERY

PLAINTIFF,

v.

Case No. 1:23-CV-00129-LY

LILLIAN MILLS, in her official capacity
as Dean of the McCombs School of
Business at the University of Texas at
Austin; ETHAN BURRIS, in his official
capacity as Senior Associate Dean for
Academic Affairs of the McCombs School
of Business at the University of Texas-
Austin; and CLEMENS SIALM, in his
official capacity as Finance Department
Chair for the McCombs School of
Business at the University of Texas-
Austin,

DEFENDANTS.

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**DEFENDANT LILLIAN MILLS’ SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO PLAINTIFF’S
DEPOSITION ON WRITTEN QUESTIONS**

TO: Plaintiff Richard Lowery, by and through his attorneys of record, Endel Kolde and Stephanie M. Brown, Institute for Free Speech, 1150 Connecticut Avenue, N.W., Suite 801, Washington, D.C. 20036, and Michael E. Lovins, Lovins | Tosclair, P.L.L.C., 1301 S. Capital of Texas Highway, Building A., Suite 135, Austin, Texas 78746.

Defendant Lillian Mills serves these supplemental objections and responses to Plaintiff Richard Lowery’s Deposition on Written Questions.

Respectfully submitted,

JACKSON WALKER LLP

By: /s/ Charles L. Babcock

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2023, I caused a copy of the foregoing pleading to be served upon counsel of record for all parties in compliance with the Federal Rules of Civil Procedure.

/s/ Charles L. Babcock

Charles L. Babcock

**SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
PLAINTIFF'S DEPOSITION ON WRITTEN QUESTIONS**

DEPOSITION QUESTION NO. 9. During the time period from June 30, 2022 through November 1, 2022, did you ever exchange text messages with Jay Hartzell concerning Richard Lowery?

ANSWER: Defendant is instructed not to answer on the basis of attorney-client privilege. Subject to and without waiving that instruction, no.

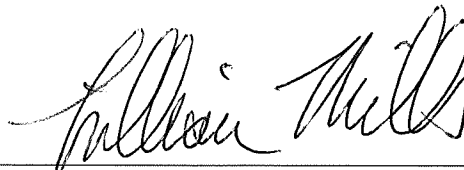
DECLARATION OF DEFENDANT LILLIAN MILLS

I, Lillian Mills, declare and state as follows:

My name is Lillian Mills. I am a defendant in this lawsuit. My supplemental answer to Plaintiff Richard Lowery's Deposition on Written Questions is within my personal knowledge and is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2023.

A handwritten signature in cursive script, appearing to read "Lillian Mills", written in black ink. The signature is positioned above a horizontal line.

Lillian Mills