



a. If yes, what evidence do you rely on to reach this conclusion?

**Response:** See answer to No. 1.

b. If no, how long do you believe it will take, if ever, to achieve such a critical mass of African Americans on your faculty, and how will you know you have achieved it?

**Response:** See Answer to No. 1.

c. Has your answer to this interrogatory been reviewed by your campus' advisory committee?

**Response:** No.

i. If yes, please provide all written responses from the committee and from members of the committee.

**Response:** Not applicable.

ii. If no, please explain why your advisory committee has not been consulted.

**Response:** See answer to No. 1.

2. Do you believe that there is a critical mass of African Americans in high ranking administrative positions on your campus?

**Response:** See answer to No. 1.

a. If yes, what evidence do you rely on to reach this conclusion?

**Response:** See answer to No. 1.

b. If no, how long do you believe it will take, if ever, to achieve such a critical mass of African Americans in high ranking administrative positions, and how will you know you have achieved it?

**Response:** See answer to No. 1.

- c. Has your answer to this interrogatory been reviewed by your campus' advisory committee?

**Response:** No.

- i. If yes, please provide all written responses from the committee and from members of the committee.

**Response:** Not applicable.

- ii. If no, please explain why your advisory committee has not been consulted.

**Response:** See answer to No. 1.

3. Please provide the name, race, address, phone number and job position of each person appointed to your campus' advisory committee, giving the date each person was appointed.

**Response:** Dr. Pat C. Covey  
Senior Vice President for Academic Affairs  
University of South Alabama, AD 300  
Mobile, AL 36688  
(251) 460-6261  
Appointed: July 11, 2002  
Race: White

Mr. F. Keith Ayers  
Director of Public Relations  
University of South Alabama, AD 250  
Mobile, AL 36688-0002  
(251) 460-6211  
Appointed: July 11, 2002  
Race: White

Dr. Barbara A. Broome  
Asst. Dean, College of Nursing; Chair, Dept. of Community-Mental Health Nursing  
University of South Alabama, SHAC 4023  
Mobile, AL 36604-3273  
(251) 434-3417  
Appointed: July 11, 2002  
Race: Black

Dr. Isabel Z. Brown  
Chair, Faculty Senate  
Associate Professor of Foreign Languages and Literatures  
Department of Foreign Languages and Literatures  
University of South Alabama, HUMB 325-B  
Mobile, AL 36688-0002  
(251) 460-6291  
Appointed: July 11, 2002  
Race: White

Ms. Diane Dixon  
Assistant Professor of Physician Assistant Studies  
Department of Physician Assistant Studies  
University of South Alabama, SHAC 4406  
Mobile, AL 36604-3273  
(251) 434-3641  
Appointed: July 11, 2002  
Race: Black

Dr. G. David Johnson  
Dean, College of Arts and Sciences  
University of South Alabama, HUMB 118  
Mobile, AL 36688-0002  
(251) 460-6280  
Appointed: July 11, 2002  
Race: White

Dr. Jeanne D. Maes  
Associate Professor of Management  
Department of Management  
University of South Alabama, MCOB 344  
Mobile, AL 36688-0002  
(251) 460-6411  
Appointed: July 11, 2002  
Race: White

Dr. Hattie M. Myles  
Assistant Dean, Office of Student Affairs and Medical Education  
USA College of Medicine  
University of South Alabama, MSB 1005  
Mobile, AL 36688-0002  
(251) 460-7313  
Appointed: July 11, 2002  
Race: Black

Mr. Shelton L. Perry  
Director, Department of Environmental Services  
USA Children's and Women's Hospital  
1700 Center Street  
Mobile, AL 26604-3391  
(251) 415-1638  
Appointed: July 11, 2002  
Race: Black

Ms. April Dupree Taylor  
Instructor in Communication, Department of Communication  
University of South Alabama, UCOM 1102  
Mobile, AL 36688-0002  
(251) 380-2800  
Appointed: July 11, 2002  
Race: Black

Dr. Harvey L. White  
Special Assistant to the President  
USAMC-Administration  
2451 Fillingim Street  
Mobile, AL 36617-2293  
(251) 471-7110  
Appointed: September 16, 2002  
Race: Black

4. Please provide the dates of all meetings of the advisory committee, the names of the persons who attended, and copies of all minutes, reports and recommendations produced by the advisory committee, including any dissenting or minority reports.

**Response:**

First Meeting - July 25, 2002

Attending: Dr. Pat Covey, Chair; Mr. Keith Ayers, Dr. Isabel Brown, Dr. David Johnson, Dr. Jeanne Maes, Mr. Shelton Perry, Ms. April Dupree-Taylor

Absent: Dr. Barbara Broome, Ms. Diane Dixon, Dr. Hattie Myles

Guest: Ms. Jean Walker Tucker, Senior University Attorney

Second Meeting - September 16, 2002

Attending: Dr. Pat Covey, Chair; Mr. Keith Ayers, Dr. Barbara Broome, Ms. Diane Dixon, Dr. David Johnson, Dr. Hattie Myles, Ms. April Dupree-Taylor, Dr. Harvey White

Absent: Dr. Isabel Brown, Dr. Jeanne Maes, Mr. Shelton Perry

Guest: Ms. Jean Walker Tucker, Senior University Attorney

Third Meeting - December 11, 2002

Attending: Dr. Pat Covey, Chair; Dr. Barbara Broome, Ms. Diane Dixon, Dr. David Johnson, Dr. Hattie Myles, Mr. Shelton Perry, Ms. April Dupree-Taylor, Dr. Harvey White

Absent: Dr. Isabel Brown, Dr. Jeanne Maes

Fourth Meeting - February 27, 2003

Attending: Dr. Pat Covey, Chair; Mr. Keith Ayers, Dr. Barbara Broome, Dr. Harvey White

Absent: Ms. Diane Dixon, Dr. David Johnson, Dr. Jeanne Maes, Dr. Hattie Myles, Mr. Shelton Perry, Ms. April Dupree-Taylor

Guest: Dr. Bob Shearer, Assistant to the President

Fifth Meeting - May 8, 2003

Attending: Dr. Pat Covey, Chair; Mr. Keith Ayers, Dr. Barbara Broome, Dr. Isabel Brown,  
Ms. Diane Dixon-Works, Dr. David Johnson, Dr. Hattie Myles, Mr. Shelton Perry, Ms. April  
Dupree-Taylor

Absent: Dr. Jeanne Maes and Dr. Harvey White

Guests: Dr. Bob Shearer, Assistant to the President; Ms. Jean Tucker, Senior University Attorney

Sixth Meeting - August 21, 2003

Attending: Dr. Pat Covey, Chair; Mr. Keith Ayers, Dr. Barbara Broome, Dr. Isabel Brown,  
Ms. Diane Dixon-Works, Dr. David Johnson, Dr. Hattie Myles, Mr. Shelton Perry, Ms April  
Dupree-Taylor

Absent: Dr. Jeanne Maes and Dr. Harvey White

Guests: Dr. Keith Nicholls, Associate Professor of Political Science; Ms. Kathryn Petersen,  
Associate University Attorney; Dr. Bob Shearer, Assistant to the President

Copies of all minutes, reports and recommendations produced by the advisory committee are  
included as Attachment A.

5. Please provide the names of all persons nominated by your campus' black faculty  
organization and/or the Knight plaintiffs to serve on the advisory committee.

<b>Response:</b>	Dr. Barbara Broome	Ms. Bobbi Holt
	Ms. Diane Dixon	Dr. Denise McAdory
	Ms. Edna Douglas	Dr. Hattie Myles
	Ms. April Dupree-Taylor	Ms. Rosie M. Peterson
	Mr. Warren Greene	Ms. Bernita Pulmas
	Dr. Johnson Haynes, Jr.	Ms. Celia Rochelle

6. Please provide the names, positions and tenure status of all black faculty members and high ranking administrators at your campus.

**Response:** USA objects to this request on the grounds that the term "high-ranking" is vague and ambiguous. Without waiving said objection, USA answers as follows:

Faculty:

Bruce Alford  
Instructor - English  
Non-Tenure Track

Seth Ankrah  
Instructor - Physics  
Non-Tenure Track

Leonard Bright  
Assistant Professor - Political Science and Criminal Justice  
Tenure Track

Barbara Broome  
Assistant Dean - Nursing  
Tenure Track

Naomi Campbell  
Assistant Professor - Chemistry  
Tenured

Reginald A. Crenshaw  
Adjunct Assistant Professor - Political Science and Criminal Justice  
Non-Tenure Track

Carl G. Cunningham, Jr.  
Adjunct Assistant Professor - Earth Sciences  
Non-Tenure Track

Diane Dixon-Works  
Assistant Professor - Physician Assistant Studies  
Tenured

April Dupree-Taylor  
Instructor - Communications  
Non-Tenure Track

Vera Finley  
Senior Librarian - Library  
Tenured

Johnson Haynes, Jr.  
Professor - Medicine  
Tenured

Juvonda Hodge  
Assistant Professor - Surgery  
Non-Tenure Track

Kern Jackson  
Instructor - English  
Non-Tenure Track

Lekeshia Jarrett  
Assistant Professor - Family Practice  
Non-Tenure Track

Cecil Jones  
Assistant Professor - Chemistry  
Tenure Track

Denise McAdory  
Assistant Professor - Sociology and Anthropology  
Non-Tenure Track

Jean McIver  
Professor - English  
Tenured

Solomon Ofori-Acquah  
Assistant Professor - Cell Biology  
Tenure Track

Althea Pennerman  
Instructor - Special Education  
Non-Tenure Track

Velma Scantlebury  
Professor - Surgery  
Tenured

Anthelyn Temple  
Associate Professor - Adult Health Nursing  
Tenure Track

Harvey White  
Special Assistant to the President and Adjunct Professor of Political Science

Felicia Wilson  
Associate Professor - Pediatrics  
Non-Tenure Track

Administrative:

Timothy Beard  
Dean of Students

Regina Benjamin  
Associate Dean, College of Medicine

Betty Bracy  
Campus Postmaster

Wince Brandon  
Business Manager, Brookley Center

Sharon Brown-Jones  
Nurse Administrator

Pauline Butler  
Nurse Administrator

Delores Carlton  
Nurse Administrator

Anne Carter  
Chief Physical Therapy

Victor Cohen  
Arena Manager - Mitchell Center

Elnora David  
Director, Materials Management

Edna Douglas  
Manager, Clinical Operations

Veronica Gonner  
Assistant Administrator - Children's and Women's Hospital

Warren Greene  
Assistant to Hospital Administrator

Claudnette McGrew  
Volunteer Services Coordinator

Scherita Mixon  
Coordinator, SMS Accounting System

Hattie Myles  
Assistant Dean, Special Programs/Student Affairs

Shelton Perry  
Director, Environmental Services

Rosie Peterson  
Director, Psycho-Social Program

Bernita Pulmas  
Manager, Student Support Services

Bobbie Ragler  
Director of Nursing

Celia Rochelle  
Manager, Minority Student Affairs

Tracy Shannon  
Nurse Manager

Pauline Smiley  
Nurse Administrator

Thomas Tucker  
Director, Small Business Development Center

Carolyn Williams  
Nurse Manager

Barbara Yates  
Nurse Administrator

**Temporary Status**

Harvey White  
Consultant

7. Please provide the name, position, current address and phone number of each black faculty member or administrator who left your institution during the past year.

**Response:** USA objects to this request based on the fact that USA is able to provide only the last address and phone number known to USA which may be different from the current address and phone number. Without waiving said objection,

USA answers as follows:

Betty S. Pace  
Associate Professor, Cell Biology and Neuro Science  
College of Medicine  
3200 Wellborne Drive East  
Mobile, AL 36695  
(251) 405-5147

Jean C. Holmes  
Assistant Professor, Maternal Child Nursing  
College of Nursing  
Four Pope Court  
Fairhope, AL 36532  
(251) 990-3921

Paulette Lewis  
Manager, Supply Distribution  
Knollwood Hospital  
4314 David's Lane  
Mobile, AL 36609  
(251) 661-0184

Dorothy May  
Nurse Manager  
Children's & Women's Hospital  
505 Nantucket Cir.  
Mobile, AL 36609  
(251) 344-0507

8. Please identify all tenure track and non-tenure track academic and high ranking administrative vacancies at your institution during the 2002-2003 school year, and for each vacancy provide:

- a. the name and race of each person hired or transferred to fill the vacancy;
- b. the name, address and phone number of all African Americans considered for the vacancy;
- c. the name, address and phone number of all African Americans submitted by the advisory committee and/or by the black faculty organization as candidates for the vacancy.

**Response:** USA objects to this request on the grounds that the terms "high-ranking" and "considered" are vague and ambiguous. Without waiving said objection, USA answers as follows:

The information related to 8(a) and 8(b) is provided in Attachment B.

This information is provided as to administrative position applicants. These lists include all those persons who applied for the open positions, not just those persons USA considered qualified. As to faculty positions, USA does not have available information on the race of applicants.

**Response to 8(c):** None.

9. Please provide the name and race of each faculty member granted tenure during the year.

**Response:** Mohammad Alam - Asian  
M. Gahan Bailey - White  
Eugene Cioffi - White  
Diane Dixon-Works - Black  
F. Carroll Dougherty - White  
Rebecca J. Giles - White  
Richard Gonzalez - White  
David L. Gray - White  
Harold J. Pardue - White  
Vasiliy Prokhorov - White  
Agnes Smith - White  
Kathy Wheeler - White  
Tenna McGuinness - White

10. Please provide the name and race of each faculty member denied tenure during the year.

**Response:** M. Linda Broughton - White  
Pieter Favier - White  
Victor Irby - White

11. Please provide copies of all advisory committee recommendations accepted and all recommendations rejected by the President.

**Response:**

**Recommendations to the President:**

- (1) Communicate to all faculty, chairs, deans, staff, administrators, and search committees the importance of increasing the number of African-American faculty and administrators.
- (2) Post faculty and academic administrator job openings on the Academic Affairs web site.
- (3) Establish a host committee/task force to assist in welcoming and entertaining African-American interviewees. The host committee should have substantial participation by African-Americans.
- (4) Conduct survey of campus for suggestions on recruiting and retaining African-American faculty and administrators.
- (5) Invite an additional candidate for interview if an African-American is close to those selected for campus interview.
- (6) Communicate to Campus Police the importance of providing an all-race friendly campus environment and that racial stereotyping must be avoided.
- (7) Provide employee training programs on campus diversity.

All recommendations were accepted.

12. Please identify all SREB black scholars enrolled during the year.

**Response:** None.

13. Please identify all SREB graduates considered for a faculty or administrative position during the year, and the results.

**Response:** None.

14. Please provide copies of all written requests by administrators and faculty members for use of the funds made available to your institution by the Court's order of April 3, 2002, submitted to the President or other official(s) authorized to approve same, and for each request provide:

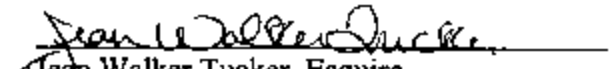
- a. any written evidence that the request was reviewed by the advisory committee and any recommendation by the advisory committee concerning the request, and
- b. all documents reflecting disposition of the request by the decision maker(s).

**Response:** Verbal inquires have been made by several deans and department chairs concerning the use of "Diversity Funds. As a result of these requests, four new faculty positions for the 2004-2005 academic year have been approved. These positions will be funded through the "Diversity Funds" and must be filled with African Americans. Copies of these approvals can be found in Attachment C.

During the past year, two separate e-mails were sent by committee members, Dr. Barbara Broome and Dr. Hattie Myles, concerning use of the "Diversity Funds". These inquiries resulted in the addition of a new faculty position in the College of Nursing to be filled with an

African American and conversion of a non-tenure track (grant funded) faculty member in the College of Medicine to a tenure-track position.

Submitted on this 14<sup>th</sup> day of October, 2003.

  
Jean Walker Tucker, Esquire  
University of South Alabama  
Office of the Attorney  
307 University Blvd., AD 131  
Mobile, Alabama 36688  
(251) 460-6294

## CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing pleading by placing same in U.S. Mail, postage prepaid, on this 14<sup>th</sup> day of July, 2003, addressed as follows:

For Plaintiffs John F. Knight, et al.:

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State Department of Education  
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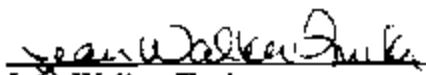
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\_\_\_\_\_  
Jean Walker Tucker