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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

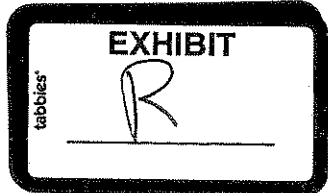
DR. B. DAVID RIDPATH,  
  
Plaintiff,

vs. CASE NO. 3:03-02037

BOARD OF GOVERNORS  
MARSHALL UNIVERSITY and  
DAN ANGEL and BOB PRUETT and  
F. LAYTON COTTRILL, ESQ. and  
K. EDWARD GROSE and  
RICHARD HILLIARD,  
  
Defendants.

The video deposition of KENNETH EDWARD GROSE,  
taken upon oral examination, pursuant to notice and  
pursuant to the Federal Rules of Civil Procedure,  
before Johnny J. Jackson, Registered Diplomate  
Reporter and Notary Public in and for the State of  
West Virginia, Monday, May 7, 2008, at the offices  
Bailey & Wyant, suite 600, 500 Virginia Street,  
East, Charleston, West Virginia.

JOHNNY JACKSON & ASSOCIATES, INC.  
606 Virginia Street, East  
Charleston, WV 25301  
(304) 346-8340



1 Mr. Ridpath was that, in this whole process,  
2 working our way through it and all, that he really  
3 needed to think about, he was a young person, he  
4 needed to think about his personal and professional  
5 future.

6 I never in any way ever threatened him.

7 And unequivocally that is an untruth.

8 Q. And to clarify, you said, You need to  
9 think about your personal and professional --

10 A. Future.

11 Q. -- future?

12 When did you say that to Doctor Ridpath?

13 A. I'm not exactly sure when it was. I don't  
14 recall. But it was in a meeting, and I think that  
15 shows up in the document that I read last night.

16 Q. Was it before or after his transfer?

17 A. I don't know. I don't recall.

18 Q. Was it in relation to his transfer?

19 A. Yes. I think so. The whole time we were  
20 making that.

21 Q. So this came up in the context of --

22 A. Just the future, get on with your life,  
23 make the transfer, and that he needed to take into  
24 consideration his personal life and his