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1 connotation. It still carries the same pain. I was very
2 surprised to hear that word. Like I said, I hadn't heard that
3 in a very, very long time. And the word coon is dehumanizing.
4 It's telling me or anybody of a person of color that you're
5 not an equal human as I am. I have to put these labels on you
6 to degrade you.

7 Q. Is that the way you perceived Tim McCoy thought of you?

8 A. Yes.

9 Q. Did that happen in -- around Thanksgiving of 2019, the
10 coonie comment?

11 A. I believe that it was around that time frame. I know it
12 was in the latter part of the year.

13 Q. Okay. So, March 5th, tell us what happened.

14 A. March 5th. March 5th started off fairly well. I was
15 known to either bring in donuts and bagels for the office,
16 take lunch orders. There was a restaurant in Lock Haven; I
17 lived in Mill Hall, Pennsylvania, at that point. There was an
18 Arby's and there wasn't one close in the State College area.
19 And we were all talking about this, and some of my colleagues
20 said that they would like, you know, for me to bring in some
21 Arby's for them the next day. So they wrote out their order,
22 and they gave me their moneys.

23 Later that afternoon, it was lunchtime, and like I
24 said, I was known to go out and pick up lunch and these things
25 for my colleagues. And I asked -- I told everyone I was going

1 to McDonald's; would you like to order something. And I
2 believe that Tim -- Tim did and Tammy and Beverly all ordered
3 something from McDonald's that I brought back for them.

4 So I come back with everyone's lunch and the proper
5 change and their meal, and I sat at my desk because there was
6 still a lot of work to be had. And I sat there and I started
7 to eat my lunch as I was working.

8 Tim come out of his office, and if this is my desk,
9 he stood on the side of the desk right here. (Indicating)
10 And he says, You know, Patricia, he said Elizabeth Warren
11 dropped out of the race. I said oh, she did? I said I'm not
12 following that. And I'm still trying to consume my lunch.
13 And he then began the conversation with President Donald Trump
14 was running for the race, and he was going to be voting for
15 him. I said oh, that's your choice; that's your preference;
16 that's fine, but I'm not following that.

17 And I'm still trying to eat my food. And he
18 continued to engage; he continued to pressure me into this
19 conversation that I did not want to have.

20 Q. So then what happened?

21 A. So he said, Well, what do you have against Trump? I said
22 I don't have anything against Donald Trump. I said he didn't
23 do anything to me. I said, you know, there's things that, you
24 know, people say that he didn't pay his contractors. I said I
25 don't agree with that. At that point, Beverly jumped up

1 because Beverly's always ready for a fight. You say the sun
2 is shining, and Beverly will find some kind of discrepancy in
3 that. She jumped up and she said no, he's not. He -- he --
4 he pays his contractors. And Tim corrected her. He said
5 there was some situations where he didn't pay certain
6 contractors or whatever. I said but I don't have a problem
7 with that, and I'm still trying to eat my meal.

8 Then something came about that Tim was still
9 talking. And at this point, he's standing in front of my desk
10 right here. (Indicating) And it was something -- some kind
11 of dialogue about President Trump may have utilized some
12 racial terms that people were upset with. And I'm ignoring
13 him at this point. And I'm typing on the computer, but he
14 moved hisself right in front of me.

15 And he said well, what do you think about the "N"
16 word? I was really taken aback with that. I was not
17 expecting that. And I said -- I looked up at him, and I said
18 that's an ugly word. No one should be saying that. Why would
19 you say that?

20 Q. What was his response?

21 A. He said, Well, Patricia, you do know the "N" word means
22 black people, right? I said it does not. That does not mean
23 black people. He said yeah, it does. He said I -- I'm going
24 to Google it. I'll show you. He picked up his phone, and I'm
25 still looking at my computer. I don't know what I was typing

1 or what I was pressing or what I was doing. All I know is
2 that I was pressing buttons, trying to remove myself out of
3 that conversation in any way possible.

4 At this point, Tom picked up his phone.

5 Q. You mean Tim?

6 A. Tim. I'm sorry.

7 Q. That's okay.

8 A. Tim picked up his phone, and he typed something in there.
9 And he comes, and he goes right in front of me. See,
10 Patricia. It does mean black people. And he had spelled it
11 N-i-g-e-r. And I looked at that, and I said that's a country.
12 And I immediately went back and started working.

13 Q. So let me -- let me interrupt you for one second.

14 Mr. McCoy sat there and told the members of the jury that you
15 were talking about a mountain. Was that true or was that a
16 lie?

17 A. That was a blatant lie. There was no discussion about a
18 mountain. How did we go from talking about Donald Trump to a
19 mountain?

20 Q. All right. So he Googles N-i-g-e-r.

21 A. Correct.

22 Q. Shows you the result, tells you that that means black
23 people.

24 A. Yes.

25 Q. Then what happens?

1 A. I informed him, that's a country. And I turned from him
2 and his phone. And Beverly then jumps up again. Pardon me.
3 Beverly jumps up and she said, Tim, you spelled it wrong.
4 It's spelled with two G's. And she said it's spelled with two
5 G's. And then she decided to pronounce it to him as if he was
6 a fourth grade student that needed his mother to assist him on
7 how to spell correctly.

8 And she said it's nig-gerrrr. That gerrrr still
9 rings in my ears to this day.

10 Tim bust out laughing, and so did Beverly. And he
11 picked up his phone, and he started pressing the buttons to
12 spell the word.

13 I had turned myself -- there's a second computer at
14 our desk. We had two computers. I turned myself completely
15 from the two of them because what Beverly did when she stood
16 up and she said excuse me, Patricia, but no offense. No
17 offense. And when the two of them decided that it was so
18 funny is when I turned my back completely to both of them.

19 And at that point, my coworker, Tammy Dunmire, said
20 hey -- she yelled from her office -- she said hey, knock it
21 off. You shouldn't be talking like that. I heard a voice of
22 comfort. And I said, Tammy, I said can I please come into
23 your office? And she said yeah. Come on. I went into
24 Tammy's office, and she immediately grabbed my hands and held
25 my hands, and she said Patricia, are you okay? And I said no,

1 I am not okay. So she said let's -- let's go outside.

2 She and I both are smokers. We went outside; we
3 walked; we sat in my car; and we walked some more. And she
4 asked me was I better to return into the office. And I
5 thought I was. I said yeah. We need to go back in. So we
6 walked in. And when you come in through the employees'
7 entrance, Beverly's desk is the first desk that you see.

8 Excuse me.

9 When I walked in, Beverly was leaned back in her
10 chair, and she watched me from the time that I walked into the
11 employees' entrance all the way until I walked to my desk.
12 And when I sat down at the desk, she then turned her chair to
13 face me. She says, Well, Patricia, how long do I have to put
14 up with this from you? Is it a day? Is it a week? What is
15 it going to be?

16 I said, Beverly, you don't get to tell -- you don't
17 get to put a time frame. You don't get to tell me that.
18 Beverly jumped up, yelling and screaming, because this is what
19 Beverly does.

20 Tim had come out of his office at that point, and
21 he was, like, hey, hey, just knock it off, you know. I wasn't
22 saying anything. It was Beverly that was running amuck. So
23 --

24 Q. Before you do this, if I may interrupt you. Excuse me.
25 It's been argued here that no one called you a nigger. Is

1 that the way you perceived it?

2 A. My perception of that is that Tim McCoy did. And I would
3 like to explain why I believe, in my perception, that Tim was
4 calling me that word.

5 Q. Please do.

6 A. Tim was the one that said that the "N" word means black
7 people. And he stood firm on that. He stood so firm on that
8 that he was willing to Google it, to prove me wrong that
9 myself and my race of people were niggers. Because he stated
10 that black people -- the "N" word means black people. His
11 definition was that.

12 So yes, I took that as him calling me a nigger.
13 Yes, I took that as him calling me a nigger. Because he
14 didn't say the "N" word means any other race of people. He
15 said black people. His definition is "N" words are black
16 people. So yes, that man called me a nigger, without saying
17 it, when he said it, because that's his definition; that's how
18 he defines that word.

19 Q. Obviously, you're shaking. Were you shaking as this was
20 going on at the time?

21 A. I was.

22 Q. Before we get into Beverly's response, how has that made
23 you feel, that you perceived your boss viewed you as a nigger?

24 A. One of the most humiliating days of my life, that my boss
25 would view me, an entire race in such a derogatory, demeaning,