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A. This was shared several times in team meetings.
Q. And would Ms. Barley say anything with respect to Mr. Lessig?
A. Yes.
Q. And what would she say?
A. She would say things like, "That's Lou. He's very smart. It's just a matter of getting a hold of him."
Ann would share similar sentiments.
Q. Do you recall Ms. Barley ever suggesting that Ms. Mohamed find a different SME for that course?
A. Not that I recall.
Q. In August 2020, did Ms. Barley talk to you about Ms. Mohamed's upcoming deadlines for her two courses?
A. Yes.
Q. And what do you recall about that?
A. She shared with me that if Ruby was unable to complete her assignments that they would be moved to me. She expressed concerns as to whether we would be able to meet the deadline. She expressed skepticism.
Q. And what was your reaction to that?
A. Surprise. I felt Ruby had been very forthcoming with the issues that she was facing on her course development. I did not hear proactive solutions coming from management to address them.
Q. Now, going back to Exhibit 28, the email that we were just

looking at, did you end up responding to Ms. Barley about the -- your anticipated completion date for your project that you were working on?

A. I imagine I did, but I don't specifically recall.

Q. Do you recall --

MS. DeFAZIO: And this exhibit can be taken down. Thank you.

BY MS. DeFAZIO:

Q. Do you recall Ms. Barley talking to you about the date by which you would need to complete that course?

A. Yes.

Q. Tell us when that happened.

A. This would have been middle of August.

Q. And what happened?

A. Carolyn approached me in the office while I was at my desk. She said she needed to speak to me urgently and privately. She was, again, red-faced, sweaty. It was clear that this was a difficult conversation.

We met on the floor in a meeting room. The tone that she used with me was unlike she ever had before. She was very rushed and said that I had to have my project done by the end of August; there was no flexibility, that if it was not complete by the end of August, I would face career repercussions at SHRM, that our -- the people above us, so, like, Jeanne Morris and Nick, were going to be watching for

this and that there was a larger context and reason that she could not share with me at the time.

Q. Did you find this conversation with Ms. Barley unusual?

A. Yes.

Q. And why?

A. She had never been strict about a deadline up until this point. And then for her to be strict about a deadline with just a couple weeks remaining seemed like -- I mean, it was very inflexible. It was unlike -- it was just also the way she spoke to me, that prescriptive, that directive, no jovialness to it.

Q. And how did you respond?

A. I shared with her that I did not think I would be able to complete it by that timeline.

Q. And how did she respond?

A. She said that was not an option.

Q. Did you have a subsequent conversation with Ms. Barley about that deadline?

A. Yes, I spoke with her again in a subsequent one-on-one.

Q. And what did she say?

A. Again, that the timeline was not flexible, that others on the team had similar timelines that were also enforced and that there would be no flexibility for any of us.

Q. Did she say anything about what completing the project would entail?

A. When I expressed my concern that I wouldn't meet the timeline, she shared that it was fine to simply complete the deck and facilitator notes by the deadline, that the Adobe Connect virtual platform could wait until a later date, that ideally I would have any supplementary materials for the classroom also complete but that that was not required. It was just the deck.

Q. Ms. Mills, did you turn in the deck for Leading a Future-Focused People Strategy by the August 31st deadline?

A. No.

Q. Did you turn in any materials for that course by August 31st?

A. No.

Q. When did you turn in the deck?

A. I turned in the deck on September 1st.

Q. And how do you remember that date?

A. I did it intentionally. I decided to forego actually finishing the project the night before, and instead, I made a comedic birth announcement for my course containing a photo of me holding a child whose face was replaced by the cover slide of my deck, announcing its birth weight of 152 slides. And I sent that in an email to everybody, to the VP -- I believe Nick Schacht was also included, to all of my team members, to everybody in the Education department, the same names in the email that you shared.

Q. And what response did you get to that birth announcement?
A. Laughter. Jeanne Morris was very tickled by it. Yeah. I made sure that no one could forget that I submitted my project late.
Q. And you said you did it intentionally?
A. Correct.
Q. Tell us more about that.
A. It was in that meeting with Carolyn when she pulled me into the conference room, she said she couldn't tell me what it was about, but it was very obvious that this was a deadline being held to trip Ruby up.
MS. DARROW: Objection. Calls for speculation, and nonresponsive.
THE COURT: Objection is sustained, unless that was a statement that was made, but that's not how the answer came out.
BY MS. DeFAZIO:
Q. Based on your knowledge at the time, Ms. Mills, why did you miss that deadline?
A. I thought if I missed the deadline, I would not be used as a counterexample and that this might prevent Ruby from being put on a performance improvement plan.
THE COURT: I think that's probably a good point for a break.
So, ladies and gentlemen, we'll take a ten-minute