

How does a Q&A dialogue unfold when an attorney catches a witness lying or exhibiting “a loose screw”?

Re: Patricia P. Munn, Part 1

Here's one of many examples from usmnews.net's archives of how a Q&A unfolds when an attorney catches a witness lying, or being or acting just plain dumb, or exhibiting “a loose screw.” The following testimony catches Patricia (“Patty”) P. Munn.

The following is the actual sworn testimony of Patricia P. Munn, then-instructor at School of Accountancy, College of Business, University of Southern Mississippi, taken on July 7, 2008, in the case, *DePree v. University of Southern Mississippi*. (Q. is DePree's attorney's question directed to Munn; A. is Munn's response).

The where we left off with deposition testimony. As noted in a usmnews.net report of then-interim School of Accountancy Director Stephen Jackson, Part 7, Jackson came to the conclusion that DePree should be fired by believing rumors from self-professed gossipmonger, Patty Munn, with, as he testified, no investigation whatsoever, and no need to investigate.

When Patty Munn was asked how she knew what she was accusing DePree of, this is her sworn testimony:

Q. You didn't see or observe any of them (behaviors you're accusing DePree of) yourself firsthand?

A. No.

Jackson's primary source of information about accusations against DePree was Patty Munn. Here's Jackson's sworn testimony:

Q. Who did you hear that from?

A. I think I heard that from Patty Munn.

Again and again, when Jackson was asked his basis for believing one accusation or another about DePree, Jackson testified,

A. I think that's the same source. I think Patty told me that, also.

Jackson based his judgment to fire DePree on the word of rumormonger, Patty Munn, who had no idea what she was talking about. Let's amplify:

Munn revealed who “expressed to her that something had to be done about Dr. DePree.”

Q. Who has expressed to you that something had to be done about Dr. DePree?

A. Doug Rouse, Ann Rouse, Robert Jackson, Bill Ray, Charlotte Ray. Linda Todd...Sandra Cobbs, Julie Norman, Cliff Norman, anyone that I know anyone I've ever had a discussion with whose asked me about him [DePree].

When asked about specific accusations she has made about DePree, here's her testimony:

Q. And who told you that?

A. I'm not sure. It was a long time ago.

Q. So you have no idea how you came to that understanding?

A. No.

Notice, Munn doesn't observe, she makes accusations on the basis of what others have told her, but she doesn't remember who tells her about specific accusations. The attorney catches a “really dumb” witness tripping over her own testimony.

And she is enthralled with gossip. You could see her eyes glimmer with excitement during the deposition when she had an opportunity to pass on another tidbit of the latest gossip. Again, from her deposition testimony:

Q. What were the reasons for [Dean Harold] Doty's firing that you heard?

USM attorney interrupted and said, “Dr. Doty wasn't fired.”

Q. Well, that he was removed as the Dean of the college of business?

A. He resigned.

Q. Why?

A. What I heard was that there was an incident with another professor.

Q. [then-Associate Dean Farhang] Niroomand?

A. Yes. And he -- and that there was some kind of sexual harassment deal with Niroomand and that Doctor Doty did not follow-up on it or discipline

Niroomand as he should have.

Q. Didn't respond appropriately?

A. That's what I heard.

Munn was ecstatic narrating another bit of gossip. She was so caught up in telling the gossip, she had no idea how revealing she was. The attorney catches a witness "with a loose screw."

What would a jury think of the reliability of Munn's testimony? If, for example, a career is in the balance? I'd venture that the following thoughts would pass through their minds: She has no personal knowledge; she passes on rumor as gospel and truth; she lives to pass on the next morsel of rumor; and how can you believe anything she says?

Well, we have to wonder how Doug Rouse, Ann Rouse, Robert Jackson, Bill Ray, Charlotte Ray, Linda Todd, Sandra Cobbs, Julie Norman, Cliff Norman feel being revealed as members of Patty Munn's gossip circle? Are you members of Munn's gossip circle Doug Rouse, Ann Rouse, Robert Jackson, Bill Ray, Charlotte Ray, Linda Todd, Sandra Cobbs, Julie Norman and Cliff Norman?

You could be, or have been, blessed being the subject of Patty Munn's gossip and her circle of gossip colleagues whoever they might be from moment to moment. The community might consider if "something should be done about" Patty Munn.