

**How does a Q&A dialogue unfold  
when an attorney catches a witness lying?  
Re: Gwendolyn Ann Pate**

Let me modify the title and substance a bit:

**How does a Q&A dialogue unfold when an  
attorney catches a witness exhibiting “a loose screw”?  
Re: Gwendolyn Ann Pate**

Here’s one of many examples from our 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 Gwen Pate.

The following is the actual sworn testimony of Gwen Pate, then-associate professor at the School of Accountancy, College of Business, University of Southern Mississippi, taken on June 10, 2008, in the case, *DePree v. University of Southern Mississippi*. (Q. is DePree’s attorney’s question directed to Jackson; A. is Jackson’s response).

First consider that in a letter Pate wrote at the end of August 2007 requesting directly then-Interim Director Steve Jackson and indirectly then-Interim Dean Alvin Williams and then-President Martha Saunders to fire DePree, that is, “to correct these issues [DePree] in some manner so that SAIS can return to being truly safe.”

Pate begins her tirade to Jackson by “...expressing her concerns about the potentially unsafe workplace...” She makes this safety point time and time again: “I know that I am personally paranoid about saying anything too loudly...I personally believe the level of paranoia that exists among my colleagues is unhealthy...It is my opinion that Dr DePree’s behavior has created a sense of fear...Given last spring’s Virginia Tech, certain things can’t be ignored...I have personally instructed my husband and my sister to make sure they retain a good attorney in case something should happen to me that is caused either directly or indirectly by Dr. DePree. I have a 12 year old son that I hope to see become an adult with a family of his own...”

Pate’s deposition answers contradict her fear. Here’s how ridiculous her fear is in her own sworn testimony:

Q. Did you ever contact campus security regarding Dr. Depree?

A. No.

Q. Did anybody ever tell you that you should call campus security if had you an issue regarding your personal safety?

A. No. I think that's common sense.

Q. Did you ever request assistance of campus security?

A. No.

Pate is equating DePree to a Virginia Tech danger and she isn't the least concerned to contact campus security. And the time period she is claiming DePree is a danger is over a period of years. Plenty of time to contact campus security. Pate admits that it's common sense to contact campus security in case of concerns about personal safety. And she most certainly claimed she was concerned about her personal safety.

Pate emotionally pleads to Jackson, Williams, and Saunders that she is afraid she will not see her 12 year old son grow to have a family of his own because DePree will directly or indirectly cause her death. But it's not serious enough to contact campus security. Does Jackson, Williams, or Saunders have any common sense to see that Pate isn't making sense?

Does this woman have a "loose screw"? Hey, we have a Virginia Tech danger here! But there's no need to call campus security.

Keep in mind that Pate is currently an associate dean at the College of Business at USM. First, can she recognize who is a danger? And second, if she believes she can, will she fail to call campus security? Her judgment is, to say the least, seriously in question.

Do you have any children at USM who might depend on the judgment of Gwen Pate?