



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF THE GENERAL COUNSEL

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TO:	Hon. Anthony J. Principi c/o Katie	FROM:	Sharon M. Peace Staff Attorney
ORGANIZATION:	BRAC	DATE:	10/5/2005
FACSIMILE NUMBER:	703 699 2735	FACSIMILE NUMBER:	(202) 273-6388
TELEPHONE NUMBER:	703 699 2951	TELEPHONE NUMBER:	(202) 273-6375
RE:	Notred v. VA, EEOC No. 100-2005-00531x	TOTAL NO. OF PAGES INCLUDING COVER:	34

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NOTES/COMMENTS:

Deposition Transcript

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ATTENTION: 024B
OFFICE OF THE GENERAL COUNSEL, PSG-IV
DEPARTMENT OF VETERANS AFFAIRS
810 VERMONT AVENUE, NW (024D)
WASHINGTON, DC 20420



DEPARTMENT OF VETERANS AFFAIRS
Office of the General Counsel
Professional Staff Group 4
810 Vermont Avenue, NW (024B)
Washington, DC 20420
TEL (202) 273-6375
FAX (202) 273-6388

October 5, 2005

VIA FACSIMILE

Hon. Anthony J. Principi
BRAC Commission
2521 South Clark Street, Ste. 600
Arlington, VA 22202

RE: Norred v. Department of Veterans Affairs, EEOC No. 100-2005-00531x

Dear Secretary Principi:

Attached please find a copy of the transcript from your deposition of September 29, 2005 in the above matter. Please review. If there are no corrections, please sign and return the Acknowledgement Form found at page 31 to me via facsimile or mail. My fax number is 202 273 6388. If changes are necessary, please note them on page 32 and return to me. Thank you for your assistance, and I look forward to hearing from you.

Yours truly,

Sharon M. Peace
Agency Representative
Staff Attorney

/smp

Attachment

1 U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

2 WASHINGTON FIELD OFFICE

3 C. FAY NORRED,)

4 Complainant,) EEOC No.:

5 vs.) 100-2005-00531

6 R. JAMES NICHOLSON,)

7 SECRETARY, DEPARTMENT OF) Agency Case No.:

8 VETERANS AFFAIRS,) 2004-0020-2004102708

9 Agency.)

11 Thursday, September 29, 2005

13 Telephonic Deposition Of:

14 ANTHONY J. PRINCIPI,

15 the witness, called for examination by counsel
16 for the Agency, pursuant to notice, commencing
17 at 10:35 a.m., before Kathryn L. Lilly, a notary
18 public in and for the State of North Carolina,
19 when were present on behalf of the respective
20 parties:

1 APPEARANCES:

2 On Behalf of the Agency:

3 SHARON M. PEACE, ESQ.

4 Department of Veterans Affairs

5 Office of the General Counsel

6 810 Vermont Avenue, N.W. (024D)

7 Washington, D.C. 20420

8

9 Also Present:

10 C. Fay Norred, Complainant

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1 P-R-O-C-E-E-D-I-N-G-S

2 MS. PEACE: This is Sharon Peace,
3 attorney for the Department of Veterans Affairs.
4 We are conducting a deposition concerning the
5 matter of Fay Norred versus the Department of
6 Veterans Affairs, EEOC Case Number
7 100-2005-00531.

8 Ms. Norred has alleged in her claim
9 a number of bases of discrimination based on her
10 reassignment, based on her performance and based
11 on harassment, and specifically whether based on
12 her age (February 15, 1949), sex (female) and
13 race (Caucasian), she was reassigned from the
14 Director of the Regional Office in Boston to a
15 Special Assistant position in the VA Central
16 Office effective May 2, 2004.

17 And whether on the basis of her age,
18 sex and race she received an annual performance
19 rating for the rating period of October 1, 2002
20 to September 30, 2003, on May 13, 2004. It was
21 signed on December 13, 2003. And she also
22 raises a number of issues based on harassment.

1 At this time I am going to ask the
2 court reporter if she can swear in the witness.
3 Whereupon,

4 ANTHONY J. PRINCIPI

5 a witness, called for examination, after having
6 been first duly sworn or affirmed, was examined
7 and testified as follows:

8 EXAMINATION

9 BY MS. PEACE:

10 Q. Can you state your name for the
11 record, please?

12 A. Anthony Principi.

13 Q. Mr. Principi, between the years of
14 2002 to 2004, can you state what your position
15 was with the Department of Veterans Affairs?

16 A. I was the Secretary of Veterans
17 Affairs at the Department of Veterans Affairs.

18 Q. How long did you serve in this
19 capacity?

20 A. I served from January of 2001 to
21 February of 2005.

22 Q. In total, can you state how long you

1 have been affiliated with the Department of
2 Veterans Affairs?

3 A. I have served at the Department of
4 Veterans Affairs on several different occasions.
5 I was the Deputy Secretary and Acting Secretary
6 of Veterans Affairs during the period 1989 to
7 2003, and then I served as the Secretary from
8 2001 to 2005. Those are the two principal
9 periods during which I served. There was an
10 earlier period in the early 1980s, I was there
11 for a short period of time before the VA was a
12 cabinet level department. I was Associate
13 Administrator, Deputy Administrator for
14 Congressional and Public Affairs, but that was a
15 very short period of time.

16 Q. Can you state for the record, are
17 you familiar with the Complainant, Fay Norred?

18 A. Yes, I am.

19 Q. When did you first become acquainted
20 with the Complainant?

21 A. I don't recall, but I'm sure that
22 Fay and I met when I was Deputy Secretary and

1 Acting Secretary. I don't recall with any
2 degree of certainty, back in '89, in that
3 timeframe, but I am sure we had met and visited
4 on different occasions as I traveled around the
5 country, and certainly I visited her Regional
6 Office in Boston at one point early in my tenure
7 I believe. I think it was pretty early, shortly
8 after I was confirmed. And then Fay was a
9 member of a task force I put together dealing
10 with women in the VA and trying to create a
11 culture of recognizing their contributions, and
12 at various meetings and social events that we
13 would be at over the course of the past four
14 years.

15 Q. So then it's fair to say that you
16 are familiar with her work then as the Director
17 of the Boston RO?

18 A. Yes, but from a 35,000-foot level,
19 if I may use that description. I obviously was
20 not in the direct line of supervision, and that
21 was within the Veterans Benefits Administration
22 so I can't say that on a day-to-day basis I

1 would -- of course I reviewed the performance of
2 each of our Regional Offices, but I wasn't
3 intimately involved in the day-to-day operations
4 of her Regional Office vis-a-vis Veterans
5 Benefits Administration, if that's clear.

6 Q. Turning a little bit to the Regional
7 Office and performance, how did you generally
8 track, while you were the Secretary, the
9 performance of the ROs, the Regional Offices,
10 nationwide?

11 A. I would get monthly reports from the
12 Undersecretary or the Deputy Undersecretary on
13 how well each of the Regional Offices was doing
14 to meet their performance targets and how well
15 the Veterans Benefits Administration was doing
16 overall and the indices with regard to reducing
17 the claims backlog. So various matrixes would
18 be presented to me monthly or on more frequent
19 occasions when I would meet with the
20 Undersecretary to discuss a wide range of
21 issues.

22 Q. When did you first learn about the

1 performance of the Boston RO in or about the mid
2 2002 time period?

3 A. Well, again, my recollection is not
4 entirely clear on the timing. I do recall
5 meeting with Admiral Cooper, the Undersecretary,
6 on several occasions in which he would raise
7 concerns that several ROs were not meeting their
8 targets, and there is certain terminology they
9 used, and I don't recall exactly, service
10 delivery targets or performance targets, and he
11 had mentioned Boston as one of those Regional
12 Offices that was deficient in some regards. And
13 there were others as well.

14 Q. In not meeting their targets, what
15 effect was that having, do you know? I don't
16 know if that was expressed to you, but what
17 effect was that having with regard to veterans
18 benefits and other areas of performance?

19 A. They were not being met. I don't
20 know how else to say it. We were all concerned
21 about the enormous backlog of claims and our
22 desire and efforts to get it under control to

1 improve the quality of our service in terms of
2 both quality and timeliness. And timeliness is
3 an important part of quality. So overall, it
4 was having an impact obviously as we tried to
5 address these issues and just to perform better
6 as an organization and as specific Regional
7 Offices.

8 Q. What, if anything, did you know
9 about the Boston Regional Office being placed on
10 a Wellness Plan?

11 A. I recall again meeting with Admiral
12 Cooper on several occasions in which he talked
13 about a Wellness Plan, a Performance Improvement
14 Plan. And again I apologize, I don't recall the
15 precise terminology he used given the breadth of
16 my responsibilities. There was so much going on
17 during the past four years, but I do recall him
18 talking with me about a Wellness Plan for the
19 Boston RO and that he was tracking it carefully.

20 And I said, fine, keep me apprised
21 of the progress and how well the RO is doing,
22 and that I looked to you as the leader of this

1 organization to ensure that everyone is carrying
2 their share of this load. And again stressed
3 very emphatically the need to grapple with this
4 enormous backlog and to do what we could, and
5 what I could as Secretary to help him get this
6 backlog under control.

7 Q. Can you explain whether you were
8 being advised on what measures were being taken
9 by the Regional Office Director to address the
10 problems that were present in her office?

11 A. I don't recall at that time whether
12 Admiral Cooper or anyone else highlighted for me
13 what specific actions were being taken. I would
14 assume he did tell me how they were going about
15 fixing the problem, what encompassed this
16 Wellness Plan, Performance Improvement Plan, and
17 what was the time line. I would instinctively
18 ask those kinds of questions and would want to
19 know how was this going to be done. I just
20 don't recall the specifics of this case of what
21 he told me at that time.

22 Q. Can you explain whether you were

1 briefed on the progress the Regional Office was
2 making, whether there was any progress in the
3 backlog and other areas of poor performance
4 during this time period?

5 A. Yes. I do recall that on several
6 occasions, I believe I met with Admiral Cooper
7 on three or four occasions over this period of
8 time, I guess 2002 through 2004, and I believe
9 it was in that timeframe, it may have been a
10 little later, it may have been 2003, but I do
11 recall Admiral Cooper visiting with me on
12 several occasions to tell me that there were
13 still deficiencies. That's my word. I'm not
14 sure he used the word "deficiencies." They were
15 not making the progress in achieving their
16 targets, performance targets, as he had hoped,
17 and that it wasn't going as well as he had
18 expected.

19 And I expressed to him the need to
20 do what was necessary to ensure that in this
21 case this RO was turning it around and the
22 problems were getting solved. And again I said,

1 was there anything I needed to do in terms of
2 resources or anything. And he said that he
3 would let me know, but that he was going to
4 continue to monitor the situation and take
5 appropriate actions. I said, fine, then keep me
6 posted. That was the general nature of our
7 conversation. Again, I can't tell you those
8 were the exact words, but I do recall those
9 conversations. I recall very clearly having
10 those conversations with Admiral Cooper.

11 Q. During those conversations can you
12 explain whether Admiral Cooper indicated whether
13 the problems were systemic problems or whether
14 it was problems with leadership?

15 A. If I recall, I think it was both. I
16 mean he was disappointed in Fay's performance.
17 He wasn't angry or nasty about it. He was
18 disappointed. He expected more and it wasn't
19 coming. And I'm sure there were some systemic
20 problems that he looked to leadership to solve.
21 And this wasn't an isolated case. There were
22 other instances in other ROs where he expressed

1 disappointment to me.

2 So it was a combination, but he
3 looked to leadership to say, hey, you're in
4 charge, I'm giving you the responsibility and
5 I'm going to hold you accountable for those
6 results. I always found him to be a man of his
7 word and great integrity and willingness to help
8 in any way he could, but at the end of the day
9 he was a servant of the VA and the veterans in
10 the nation and he had an expectation because I
11 had an expectation that this is where we would
12 be. And unfortunately in some cases we didn't
13 get there.

14 Q. When you indicate that you had an
15 expectation, you had an expectation of what
16 specifically?

17 A. I had an expectation that we were
18 going to reduce the enormous backlog of claims.
19 We set a goal. We had milestones established on
20 how we were going to go about it, and I was
21 willing to go to bat and get the resources
22 necessary, which I did, and put in new processes

1 or give the Undersecretary authority to
2 establish new processes, working on new
3 technology. It was a shared effort.

4 But in the final analysis it's the
5 field leadership that has to carry that ball
6 across the goal line. I set certain
7 expectations, certain goals. I was willing to
8 come off course if necessary depending upon the
9 circumstances because we live in a changing
10 world, a changing environment, brought about by
11 statutes and regulations and judicial decisions,
12 but at the same time we had a course that we
13 were on and we had milestones to achieve. And
14 again, I look to my people to get the job done.

15 Q. During those conversations with
16 Admiral Cooper, can you indicate whether he
17 raised the fact that there may have been some
18 mitigating circumstances at the Boston RO that
19 could explain the poor performance that they
20 were having, such as the hiring freeze, things
21 of that nature?

22 A. No, not in particular at that RO.

1 In general of course we knew that there is
2 always resource issues and other factors that
3 come into play and we take those into
4 consideration when we set targets and goals. We
5 don't do that in a vacuum. I certainly try not
6 to do it in a vacuum. I don't believe Admiral
7 Cooper did it in a vacuum.

8 So we knew that there were systemic
9 problems, not only in Boston, but everywhere,
10 and those were addressed in setting the
11 performance targets and the goals. I don't
12 recall discussing them when he came in to tell
13 me that Boston was not achieving its goals. He
14 very well may have pointed out some of the
15 problems there. I just can't tell you for sure.
16 I didn't make any notes of those conversations.

17 Q. During those conversations with
18 Admiral Cooper, he was not limiting his
19 conversations to the Complainant only, but
20 rather he was making reference to the
21 performances of other ROs as well?

22 A. If he came to talk to me about

1 Boston, we would talk about that. And then he
2 would say, okay, now let's go from Boston to New
3 York to Maine or wherever. On some occasions he
4 may have done that, but if there was a
5 particular issue that he wanted to talk with me
6 about he would say, I'd like to talk to you
7 about Boston, okay, fine, come on in, let's sit
8 down and talk about Boston.

9 Maybe on occasion he would say, I
10 would like to talk to you about Regional Office
11 A, Regional Office B and C, but I think more
12 often than not, he would come in on a specific
13 issue and we would discuss it. We may go on to
14 other issues. I think that was the approach.
15 It was very informal. I try to have an open
16 door policy. If anybody needs to see me in the
17 organization, they could come in anytime, day or
18 night, and talk with me about problems.

19 Q. During this time can you indicate
20 whether you ever heard from the Complainant and
21 did she express any concerns about the Boston
22 RO, whether she ever contacted you directly?

1 A. I don't think so, no. I don't
2 recall. I do not believe Fay Norred contacted
3 me directly.

4 Q. Let's turn our attention at this
5 point to the Performance Review Board. Do you
6 actually sit on the board?

7 A. No.

8 Q. Explain how the Performance Review
9 Board communicates their recommendations for SES
10 level staff performance appraisals.

11 A. I think annually they come in or the
12 leader of the Board, Ventriss Gibson, when she
13 was the Deputy Assistant Secretary for
14 Personnel, I don't know the exact title she had,
15 she left I think in 2003, maybe early 2004, but
16 annually I would get the recommended list of
17 ratings and bonuses and I would go through it
18 carefully, and it required my concurrence. On
19 some occasions I would make changes. More often
20 than not I would not make changes unless it was
21 something that I had knowledge of and I would
22 question.

1 The process would be that they would
2 bring me a package for each of the
3 Administrations and Staff Offices and I would go
4 through them. My Deputy Secretary Chief of
5 Staff would go through them. We would discuss
6 them, and then sign off. And that was the
7 process. If I had questions, I would call in
8 the Undersecretary and say, can you tell me
9 about this, why this rating, is it too high, is
10 it too low, is the bonus about right.

11 Particular cases where I had personal knowledge,
12 whether it be through something I read or
13 remembered or a site visit or concerns on the
14 Hill or service organizations about some
15 problems, then I would raise questions about it.

16 Q. So at the time you did receive then
17 the list from VBA concerning SES or the Regional
18 Office Directors, their performance appraisals?

19 A. Yes.

20 Q. Do you recall the performance
21 appraisal that was recommended by the Board for
22 the Complainant?

1 A. I don't know whether it was fully
2 satisfactory or minimally satisfactory. I just
3 can't say with any degree of certainty that I
4 knew at that time. I believe based upon what I
5 know now, when this deposition came to my
6 attention that I was going to be doing this
7 today, that Fay had received a fully
8 satisfactory. I believe she did, maybe I'm
9 wrong. I just don't recall. There are hundreds
10 upon hundreds of these, and I don't recall.

11 Q. Do you recall whether you had any
12 questions about the recommended rating?

13 A. I may have because the
14 Undersecretary, Admiral Cooper, had raised it
15 with me on several occasions. So when I met
16 with him I might have asked him why this rating,
17 is it too high or is it too low. More than
18 likely we discussed it. I would assume because
19 their was a performance issue here that I would
20 have discussed it with him.

21 Q. Was there ever an occasion where you
22 wanted to lower?

1 A. Yes.

2 Q. And when you wanted to lower, what
3 guidance did you receive about whether that was
4 going to be possible?

5 A. I would discuss it very carefully
6 with the Undersecretary, with Ventris Gibson,
7 but I primarily would discuss it with my Chief
8 of Staff, Nora Egan, who is what I consider a
9 personnel expert having been in HR for many
10 years previous to her position as Chief of
11 Staff. So I would speak with Nora Egan if there
12 was a question, Ventris Gibson, the personnel
13 people, and of course from a programmatic
14 perspective, the Undersecretary, as to why this
15 was an outstanding, shouldn't this have been a
16 fully satisfactory, or you raised questions
17 about someone's performance and why is it a
18 fully satisfactory and not a minimally
19 satisfactory. So yes, I would have those
20 discussions on certain individuals, probably
21 every year at least one or maybe two would arise
22 that I would discuss.

1 Q. Do you recall whether you had those
2 discussions concerning the Complainant and the
3 rating that was recommended?

4 A. I think so. I really think so.
5 Again, I apologize, this is one of many and
6 years ago. I would believe that I would have
7 had that discussion with Admiral Cooper. Yes,
8 I'm almost certain I did.

9 Q. Do you remember what you discussed?

10 A. I would have said, why have you
11 given Fay this rating. I would imagine I would
12 say, why fully and not minimally, why fully and
13 not outstanding, what's the basis for it. You
14 pointed out performance problems, how does that
15 square with the current rating you have given
16 her. I think at the end of the day he convinced
17 me that the rating was appropriate.

18 I might be wrong, but I think that's
19 probably what happened. I very seldom changed
20 it, maybe one or two times. It could have been
21 in Fay's case, I don't know for sure, but it was
22 very rare. If you go back and look at the four

1 years, it was very rare that I would change a
2 rating that was given to me by the respective
3 organizations.

4 Q. You indicated that you believed that
5 the Complainant received a fully satisfactory,
6 was any other recommendations made to you at
7 that time concerning the Complainant?

8 A. Any other recommendations?

9 Q. Let me be a little more specific.
10 Can you explain whether any recommendations
11 concerning her reassignment or transfer were
12 made to you?

13 A. I do recall Admiral Cooper
14 recommending to me that Fay be transferred to a
15 different position, and the position was in
16 Washington. I believe it was on policy, perhaps
17 Policy and Planning in the Office of the
18 Undersecretary. I don't recall precisely. But
19 I do recall on one of his last visits regarding
20 this case that he suggested or recommended, I'm
21 assuming I was the approval authority, that this
22 be done. So yes, he did.

1 Q. Can you explain whether that
2 recommendation or the recommendation of a
3 transfer to another position had any effect on
4 the final performance rating that the
5 Complainant received?

6 A. No, I don't think so. I don't think
7 they were linked together, that she was given
8 this rating to support this transfer, if that's
9 the question. No, I don't believe so. I
10 believe the rating was based upon her
11 performance. And the decision to transfer her
12 was in the best interest of the Veterans
13 Benefits Administration and the Regional Office
14 in particular to bring in new leadership and try
15 a different approach. So that's my
16 recollection. But all of this was generated by
17 the Benefits Administration and brought up to me
18 for concurrence.

19 Q. Did you have any input into the
20 decision to have her transferred back or
21 transferred to Central Office to a position
22 here?

1 A. Yes. Admiral Cooper consulted me,
2 discussed the matter with me, and I supported
3 his decision. So yes, I was involved in that as
4 the Secretary.

5 Q. So you ultimately approved the
6 reassignment of the Complainant to the position?

7 A. Again, I believe I signed off on the
8 documentation. I believe it required
9 Secretarial approval. I certainly orally
10 supported his decision, and I'm assuming it
11 required my written approval as well. But I
12 haven't reviewed any documentation that shows my
13 signature approving Fay's transfer to
14 Washington. But I believe that's the case.

15 Q. During your four-year tenure during
16 this time period, can you recall whether any
17 other Director had been treated similarly? And
18 when I say treated similarly, meaning receiving
19 a directed reassignment to another position like
20 the Complainant.

21 A. Well, I know there were several
22 other problems, and I believe there were other

1 directed transfers. I'm almost positive of
2 that. But I don't recall the specifics. But I
3 do recall that there were several ROs that were
4 having some serious performance issues and
5 decisions were made to move people. So I
6 believe that's the case.

7 Q. I am going to switch the topic to
8 something that you mentioned, the task force for
9 women. Explain a little bit about what the
10 purpose of the task force was and what was it
11 set up to address.

12 A. The task force was set up to bring
13 together women leaders from across the
14 Department to discuss issues impacting on how we
15 can improve the environment, the culture of
16 promoting women into positions of leadership.
17 We did something similar in minority affairs,
18 just my concern that we have a balanced work
19 force that recognizes the contributions of women
20 and minorities in the VA and that we are
21 sensitive to these issue. And I created this
22 task force.

1 I don't recall the precise title of
2 it, but the whole concept was, are we deficient
3 as an organization, where are our strengths,
4 where are our weaknesses and how can we foster a
5 climate of recognizing the role of women in the
6 organization and ensure that there is no glass
7 ceiling here. And that was the concept, if you
8 will.

9 Q. Can you explain whether you saw an
10 improvement in recognition of women during your
11 tenure during that time period after the task
12 force was set up?

13 A. Well, I hope so. I don't recall
14 looking at the matrix, but I would hope that
15 even prior to the task force being set up there
16 was. It was well known throughout the
17 Department what my views were with regard to
18 women and minorities in the VA. The fact that
19 my Chief of Staff was a woman, a career woman,
20 probably one of the few career women to be
21 appointed Chief of Staff to a Cabinet Secretary
22 because most of them are political and probably

1 99 percent of them are men, and my Executive
2 Assistant, so I was surrounded by very capable
3 and competent women.

4 And I hope that sent a very powerful
5 message to my leadership, that I took this issue
6 very seriously. And I believe we improved. But
7 like any organization, you are never satisfied.
8 You should never be satisfied. And if I was
9 Secretary today, I would not be satisfied.

10 Q. Can you express or explain whether
11 you received complaints concerning the treatment
12 of women within the VBA organization?

13 A. There may have been a specific case
14 arise during my tenure. I'm sure there was. I
15 just don't recall the specifics. An
16 organization the size of the VA, these problems
17 are going to surface from time to time. If
18 people legitimately feel aggrieved, they have a
19 right to pursue their remedy. So sometimes it
20 may get up to my level; other times it did not.
21 It would be resolved at the Administration
22 level. So I think generally speaking the answer

1 is yes.

2 Q. What about whether you received or
3 recall receiving complaints specifically
4 concerning Michael Walcoff? And I don't know if
5 you know Mr. Walcoff or are familiar with him.

6 A. I do know him very well.

7 Q. Can you explain whether you had ever
8 received any specific complaints about
9 Mr. Walcoff's treatment of women that worked
10 with him or were subordinate to him?

11 A. No, I did not. I absolutely do not
12 recall any complaint about Mike Walcoff. His
13 wife is a Regional Office Director, and I would
14 be very surprised if he did not treat women with
15 great dignity and respect, but I don't recall
16 any.

17 MS. PEACE: I don't have any further
18 questions at this particular moment.

19 Ms. Norred, do you have any
20 questions?

21 MS. NORRED: No, thank you.

22 MS. PEACE: Then based on that, we

1 will conclude the deposition at this time.

2 THE WITNESS: Thank you very much.

3 * * * *

4 (Thereupon, at approximately 11:10
5 a.m. the above proceeding was adjourned.)

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CERTIFICATE OF NOTARY PUBLIC

STATE OF NORTH CAROLINA

I, Kathryn L. Lilly, a Notary Public in
 and for the State of North Carolina, before
 whom the foregoing cause was taken, do hereby
 certify that the witness whose testimony appears
 in the foregoing transcript was taken by me
 in shorthand at the time mentioned in the
 caption hereof and thereafter transcribed by me;
 that said transcript is a record of the
 testimony given by said witness to the best of
 my ability; that I am neither counsel for,
 related to, nor employed by any parties to the
 action; and further, that I am not a relative or
 employee of any counsel or attorney employed by
 the parties hereto, nor financially or otherwise
 interested in the outcome of this action.

NOTARY PUBLIC

My Commission Expires:
 July 27, 2008

1 U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

2 WASHINGTON FIELD OFFICE

3 C. FAY NORRED,)
 4 Complainant,) EEOC No.:
 5 vs.) 100-2005-00531
 6 R. JAMES NICHOLSON,)
 7 SECRETARY, DEPARTMENT OF) Agency Case No.:
 8 VETERANS AFFAIRS,) 2004-0020-2004102708
 9 Agency.)

10 ACKNOWLEDGMENT OF DEPONENT

11 I, Anthony J. Principi, do hereby
 12 acknowledge that I have read and examined pages 2
 13 through 29, inclusive, of the transcript of my
 14 deposition taken on Thursday, September 29, 2005,
 15 and that:

16 (Check appropriate box)

17 [] the same is a true, correct, and complete
 18 transcription of the answers given by me to the
 19 questions therein recorded.

20 [] except for the changes noted in the attached
 21 Errata sheet, the same is a true, correct, and
 22 complete transcription of the answers given by me
 to the questions therein recorded.

Date

Signature

