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COURT OF APPEALS DIV #1
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No. 63687-1-I

IN THE
COURT OF APPEALS, DIVISION I
OF THE STATE OF WASHINGTON

**ANGELA JU and
FRANCES DU JU,**

Appellants pro se

v.

**THE UNIVERSITY OF WASHINGTON,
KIMA LEIGH CARGILL, and
SUSAN ELIZABETH JEFFORDS,**

Respondents.

REPLY BRIEF OF APPELLANTS

Angela Ju and Frances Du Ju
Appellants pro se

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I. STATEMENT OF THE CASE

In Respondents' Brief, Respondents brought up more lies or unsupported facts trying to mislead this Court. The following is a summary that shows that Respondents did not tell the truth.

A. The Numerical Grades Contract.

Respondents stated in the footnote of ¶IV.C. at 18, "Plaintiffs erroneously refer to the University Handbook as the 'Faculty Senate Handbook.'" Exhibit A (CP 298-309) of Declaration of Angela Ju in Support of Plaintiffs' Memorandum in Opposition to Defendants' Motion to Strike is a copy of the University of Washington Faculty Senate Handbook, Volume 4, Part 3, Chapter 11 "Grades, Honors, and Scholarship." In Section 1, Subsection ¶A.7, (CP 302), the rule states, "c. CR/NC courses must be so designated in the *Time Schedule*." The Subsection states, "S-B 117, June 1971; S-B 124, March 1975; S-B 134, June 1980; all with Presidential approval..." The Faculty Senate Handbook consists of ultimate rules that all Faculty members should follow. Appellants do not own a copy of the University Handbook. Even though the University Handbook may include the same rule, it is wrong and misleading for the Respondents to state that Appellants were "erroneous."

In Pages 2, 15, 24, 25, 26 and 27, Respondents argued about Numerical Grades. The Opening Brief of Appellants ¶III.B.3. at 8-9 and ¶IV.D. at 15-18 regard Numerical Grades. The crucial part of the University of Washington (hereinafter “UW”) Faculty Senate Handbook (CP 294-295, 302, 321) states, “c. CR/NC courses must be so designated in the *Time Schedule*.” The Cuba Program courses were not designated in the Time Schedule as CR/NC courses. Respondents argued about the “syllabus” in the Respondents’ Brief. Appendix 1 is a copy of the 2006 Cuba Program syllabus. In Page 2 under “Evaluation and Grading”, it states that the professors would be “using the UW grading system.” Thus, it is clear that Numerical Grades should have applied to all the 2006 Cuba Program students. Another fact is that other students who took the courses received numerical grades (CP 322), but Angela Ju did not.

In Page 26 of Respondents’ Brief, Respondents stated, “Indeed, the record shows that the subject of numeric grades never even came up until April 2007, a full year *after* Angela returned from Cuba and received credit for the program, when she tried to convert the credit to grades. *See*, CP 162.” Respondents obviously lied. Angela Ju sent an e-mail to Dr. Cynthia Duncan on June 28, 2006 (CP 165-166) saying, “I am writing to appeal my grades for SISLA 399 and SISLA 490 during winter quarter 2006. Particularly, I am requesting that I receive numerical grades for

these two classes to replace the CR's that I have received for each class.

... before I apply to Ph.D. and J.D. programs during autumn quarter.”

B. Dr. Cargill Specializes in Psychological Experience of Food and Culture, and Dr. Jeffords Specialized in Women Studies.

On Pages 15, 31 and 32 of the Respondents' Brief, Respondents brought up Appellants' discrimination and retaliation claims. On Pages 1, 2, 8, 9 and 10, Respondents argued that Angela Ju's mental and physical problems were the reasons that Angela Ju had to suffer all the unfair treatment and injuries from the UW and its faculty. In Case No. 63133-1-I, Appellants stated in Motion For Discretionary Review of March 21, 2009, the facts about how the UW and its faculty treated Angela Ju after Angela Ju filed a sexual harassment grievance with the UW. Pages 6 and 7 of the Respondent's Brief described about Dr. Taso Lagos, who was the instructor of the Greece Program in summer 2005. An important fact that Respondents did not want to mention is that the UW Honors Program would not allow Dr. Lagos to host his program through the Honors Program after the summer 2005 Greece Program.

In November 2005, Angela Ju filed a sexual harassment grievance against Dr. Lagos with Respondent the UW at the suggestion of the UW Ombudsman. During and after this time, the Respondents held her to different standards than other students not of perceived disability. Angela

but Respondents do not call her “Dr. Duncan.” Respondents purposely wrote “Dr. Kima Cargill and Professor Cynthia Duncan” repeatedly in the Respondents’ Brief trying to mislead people into thinking that Professor Cargill holds a medical degree.

Appendix 2 shows that Professor Cargill’s research “examines the psychological experience of food and culture, specifically how cultural identity and childhood development are mediated by food customs and rituals.” It does not show that she is a physician or an expert in physical healthcare.

Appendix 3 is a copy of UW Bothell’s Vice Chancellor’s Biography of Dr. Susan Jeffords. She “served as a faculty member of the English Department before becoming Chair of the Women Studies Department in 1992” Dr. Jeffords’ research interests are “Hollywood film, the Vietnam War, and feminism.” Nowhere does it say that she is a physician or an expert in physical healthcare. Thus, it is a fact that neither Dr. Kima Cargill nor Dr. Susan Jeffords was a physician or an expert in physical healthcare even though they kept acting as physicians or physical healthcare experts, without licenses issued by the State of Washington, in 2006.

II. ARGUMENT

A. The Impact of the Breach of Numerical Grades Contract.

It has been almost three years since Angela Ju graduated from the University of Washington. The disadvantage of the recalculation of the CR's grades by the LSAC constituted part of her decision to not apply to law school. Otherwise, Angela Ju would have been in a better position to prosecute the UW and Dr. Cargill and Dr. Jeffords in this lawsuit in pursuit of justice.

After Dr. Duncan rejected Angela Ju's request to change to Numerical Grades, Angela Ju did not give up her effort to correct the wrongs. On April 5, 2007, Angela Ju e-mailed (CP 162-171) Professor Greengrove, who was the Interim Director of the UW Tacoma, about the CR's that the UW gave her for SISLA 399 and SISLA 490. She requested that these credits be changed into Numerical Grades. She wrote, "Additionally, for law school applications, LSAC automatically converts all CR grades into 0.0's in the recalculation of GPA for admission." She told Professor Greengrove that she was graduating at the end of spring quarter 2007, so the matter needed to be handled as soon as possible. Nevertheless, Professor Greengrove did not make a decision to reject Angela Ju's request until June 14, 2007. (CP 157)

Angela Ju's not reminding Dr. Duncan and Dr. Cargill about the Numerical Grades contract that Frances Ju and the UW Assistant Vice Provost Mr. David Fenner had reached in February 2006 prevented her

from receiving malicious grades from the two instructors. In Page 14 of the Respondents' Brief, Respondents stated, "Angela ignored Professor Duncan and submitted her final paper anyway. Professor Duncan was unwilling to accept or grade the paper because Angela's compromised participation in Cuba did not allow for adequate research and reflection in Cuba as required. CP 164-165." When we look at CP 164, Dr. Duncan e-mailed Angela Ju, Mr. David Fenner, Dr. Cargill and Ms. Kim Davenport and claimed in the e-mail that Angela Ju simply sent the final research paper to Dr. Duncan in the mail. This was a lie. On the day that the paper was due, Angela Ju took the Amtrak train to Tacoma to turn in her final research paper under Dr. Cargill's door and talked to Dr. Duncan with Mr. P.J. Valdez in person on that day.

Page 15 of the Respondents' Brief started with, "Although the professors assigned failing grades for the culture component and the research paper, the University of Washington overrode the professors and awarded Angela all 15 academic credits associated with the Cuba program. She received a numeric grade only in the Spanish language class, however. CP 469-470; CP 43-44." It raises a question as to why the UW overrode the professors if this is in fact the case. It is uncommon and difficult for a college to override its professors regarding a student's grades. Mr. David Fenner could be a man of his words. He might have

conveyed the contents of the Full Credit and Numerical Grades contract to the UW. The contract made the UW decide to override the professors to give Angela Ju Full Credit, but to give Angela Ju CR's to prevent complaints from the professors. Angela Ju was a Washington Scholar. Failing grades in a specific quarter would have made Angela Ju lose the scholarship or put her on probation and the parties would have started this lawsuit right away.

¶E. of Prayer For Relief in the Plaintiffs' Complaint (CP 477-488) states, "Award Plaintiff Angela Ju the honor that she would have received as a result of grade adjustments." When the CR's are converted to Numerical Grades, Angela Ju is entitled to receiving the *Cum Laude* honor. Angela Ju worked hard and performed well during her four years of study. She earned the honor, but the UW's violation of the Faculty Senate Handbook has made her have to go through the legal system to get the *Cum Laude* honor.

B. Respondents Falsely Described Angela Ju's Physical Health or Behavior and the Contract(s) They Made Her Sign.

In Pages 6, 7, 11 and 12 of the Respondents' Brief, Respondents falsely described Angela Ju's physical health or behavior and the contract(s) that they made Angela Ju sign. In Page 7, Respondents stated, "On Sunday, Angela traveled to Syntagma Square by herself (against the

program rules) and again collapsed. While she was on the ground, her cash, traveler's checks and telephone card were stolen." In Plaintiffs' Memorandum in Opposition to Defendants' Motion For Partial Summary Judgment of December 26, 2008, Appellants told the Superior Court what happened. Outside of the United States, pickpockets are almost everywhere, especially in large cities. Pickpockets are involved in organized crime, and they regularly use substances like Chloroform. When seeing the pickpockets in action, most people just do not speak up for their own safety. During the deposition, Ms. Westermeier questioned Angela about things being stolen as if Angela had severe medical problem so that Angela could not identify how the pickpockets stole Angela's belongings. Ms. Westermeier not only did not sympathize with Angela's being a victim of pickpockets, but also accused her of not following the Greece Program rules when it was not a rule. Respondents have produced no evidence that it was a program rule.

In Page 11 of the Respondents' Brief, Respondents lied about the contract(s) that they made Angela sign. Angela Ju only signed one "contract" in Cuba. On February 7, 2006, Respondent Dr. Kima Cargill requested that Angela Ju sign a contract that had been pre-dated on the previous date, February 6, 2006, if Angela Ju wanted to stay in Cuba. The validity of the contract was in doubt because Angela Ju was coerced into

signing it. The UCIRO notes on Ms. Mary Hinds' testimony supports this fact: "The contract-She's seen it. Better to have AJ sign it earlier if concerned not taking care of herself. Typical in Mary's clinic for outpatients – there are the rules. Why sign while in-patient? AJ was already doing the items in the contract". (CP 185-186).

Ms. Mary Hinds is a registered nurse. As mentioned in ¶I.B. of this Brief, Respondents purposely wrote "Dr. Kima Cargill and Professor Cynthia Duncan" repeatedly in the Respondents' Brief trying to mislead people into thinking that Professor Cargill holds a medical degree. It can be inferred that a registered nurse is more familiar with physical healthcare than a Ph.D. in counseling psychology.

None of the incidents that Respondents described in Page 11 happened after Angela Ju signed the contract, especially considering that Respondents largely lied about those incidents. Angela Ju never passed out at the party. No students put Angela Ju to bed that night. Angela Ju sat on her bed during part of the party because the party was on the patio outside of her bedroom. Angela Ju's roommate, Ms. Clara Cheeves, and Angela Ju went to El Benny with Mr. P.J. Valdez because it was Ms. Cheeves's birthday and it was on a Friday night. They danced for 40-45 minutes. They then sat in a park talking for a few hours and did not return

until early in the morning. They were not at El Benny for more than 40-45 minutes.

C. **Dr. Jeffords Abused Her Administrative Power and Failed to Prove That Other Healthcare Providers Were Not Trustworthy.**

Dr. Susan Jeffords' job function did not require her to falsely tell Appellants that she would resolve the issues if Appellants would follow her instructions to take certain actions spelt out by her. Her job function also did not require that she make express assurances that she had no intent to carry out. In Page 12 of the Respondents' Brief, Respondents argued, "Angela did not return to Hall Health until six days before the program ended." Right after Respondents sent Angela Ju back from Cuba, Appellants started sending e-mails to Respondents on February 12, 2006, in addition to the several hours of telephone conferences with Mr. David Fenner on Friday, February 10, 2006, when Appellants were in Miami, Florida. Dr. Susan Jeffords was Mr. Fenner's immediate supervisor. The UW gave Angela Ju false hope by directing her to file a UCIRO complaint. In Page 15 of the Respondents' Brief, Respondents wrote about the UCIRO. The fact is that the UCIRO was headed by a manager, while the UW administrators whom Angela Ju expected the UCIRO to investigate were holding positions at or higher than Assistant Vice

Provost. The UCIRO manager or investigators did not want to confront the UW faculty members, either.

Dr. Jeffords did not tell Angela Ju to go to the UW Hall Health Primary Care Clinic until days before the Cuba Program was going to end. The UW failed to prove that other healthcare providers who were the contract providers under Angela Ju's health insurance plan were not trustworthy and that only the UW physicians have credibility.

In Page 12 of the Respondents' Brief, Respondents argued, "she never turned in the required health screening form. Without the necessary medical clearance, Angela was not allowed to return to Cuba." This is also where Dr. Susan Jeffords abused her administrative power. Dr. Jeffords deliberately did not respond to Mr. Anil Coumar's message (CP 104, CP 234) even after Angela Ju rescheduled her tickets twice and stayed four extra days in Seattle because of Dr. Jeffords' express assurances. It made it impossible for Angela Ju to complete "the required health screening form," as Respondents' Brief claimed, to go back to Cuba.

In Pages 8, 9, 12 and 16 of the Respondents' Brief, Respondents emphasized that Dr. Erlanger, who was a physician at the UW Hall Health Primary Care Clinic, was the one whom the Respondents designated as the physician with whom Angela Ju had to make appointments and that

Angela Ju had to include Dr. Erlanger's reports whenever Angela Ju saw a physician. Mr. David Fenner had given Dr. Erlanger Dr. Taso Lago's false report about Angela Ju without Angela Ju's version of the incidents. It was an obvious breach of Mr. Fenner's agreement with the UW Ombudsman. Respondents tried to give other physicians a mistaken impression and information that Angela Ju had severe mental problems in addition to physical problems. In Case No. 63133-1-I, Appellants stated in the Motion For Discretionary Review of March 21, 2009, that Defendants adopted the authoritarian state police's favorite method by telling Angela Ju that she had mental health problems and other problems. Angela Ju was told that she had to go to the doctors named by Defendant Dr. Susan Jeffords and Dr. Cargill at the UW's clinic. Various doctors and physicians in the United States have been able to verify the symptoms that Angela Ju had at the time that she went to the International Clinic in Cienfuegos, such as blood in urine and blood in stool. For example, a doctor at the University of California in Los Angeles verified in March 2008 that Angela had had blood in her stool because she had had hemorrhoids for the past two years (CP 240-244). Unlike the doctor at the UCLA, the UW's doctors never found out or told Angela Ju that her hemorrhoids caused blood in her stools. Disregarding the physical problem that Angela suffered such as hemorrhoids, the UW doctors were

eager to diagnose Angela with mental health disorders of which Angela did not complain.

Another example is that on Monday, February 13, 2006, the first business day after Angela Ju was sent back home from Cuba, a physician at the Vancouver Clinic, one of the largest clinics in Southwest Washington, examined Angela Ju and disagreed with what the defendants had claimed (CP 238).

In Pages 1, 3, 6, 16, 20, 21, 22 and 29 of the Respondents' Brief, Respondents argued about the early fall 2006 Law, Society, and Justice Rome Program. Angela Ju applied for the Program in February 2006 and was admitted. She started submitting the required forms in March 2006, including the required concurrent enrollment forms and health evaluation on July 1, 2006. (CP 90). In Page 29 of the Respondents' Brief, Respondents stated, "Angela, like every other student, was required to submit the required health screening form before she was approved for study in Rome. It is undisputed that Angela never submitted the form and therefore was not permitted to study in Rome. CP 470," Respondents lied.

In Page 16 of the Respondents' Brief, Respondents stated, "The University, through Dr. Jeffords, informed Angela that before the UW would permit her to participate in the Rome program, she would be required to

obtain medical clearance from a doctor who had access to her records with Dr. Erlanger at Hall Health. CP 437-438; 470. Angela never provided such clearance and therefore was not able to participate in the Rome program. *Id.*; CP 440.” It was apparent that Dr. Jeffords tried to act as a physician or a healthcare expert. As the Vice Provost for Global Affairs, Dr. Jeffords exercised her power to keep Angela Ju from attending another study abroad program. She repeatedly abused her administrative power and made Angela Ju a victim.

For the Rome Program, Angela Ju bought the airlines tickets in April 2006. In August 2006, Dr. Susan Jeffords abused her administrative power again by asking Angela Ju for additional medical evaluation at the UW Hall Health Primary Care Clinic that would include false statements by both Dr. Kima Cargill and Dr. Taso Lagos, neither of whom are physicians. Dr. Jeffords’ denial of Angela’s participation in the Rome Program occurred two days before Angela left for Europe. The Rome Program was available for other students. Angela then lost interest in going to law school.

D. **Respondents Not Only Did Not Care About Implied Contracts, But Also Recklessly Breached Express Contracts.**

In Page 19 of the Respondents’ Brief, Respondents cited Marquez v. University of Washington, 32 Wn. App. 306, 648 P.2d 94 (1982), which

care about implied contracts, but also recklessly breached express contracts.

In Page 22 of the Respondents' Brief, Respondents stated, "Angela obtained the necessary clearance to go to Cuba, but was sent home on medical advice. The University's decision to return her was reasonable and consistent with its requirements for international study, and not in violation of any contrary 'promise.'" The so-called "medical advice" was that Dr. Kima Cargill had lied to the Cuban doctors, Mr. David Fenner, and anybody who would listen to her about Angela Ju's symptoms. Partly because of this, the Cuban doctors were not able to make a correct diagnosis that doctors in the United States were able to make, such as hemorrhoids (UCLA, CP 240-244), blood in urine and virus (Vancouver Clinic, CP 238). Angela Ju had only told a male Cuban doctor her symptoms on her first night in the Clinic. It was Dr. Cargill and not any medical personnel who requested that Angela Ju be kept overnight at the Clinic so that Dr. Cargill could continually lie about Angela Ju's condition. During Angela Ju's last day in the Clinic, a female doctor told Angela Ju that Dr. Cargill wanted to send her home.

In Pages 26 and 27 of the Respondents' Brief, Respondents relied heavily on Marquez v. University of Washington, 32 Wn. App. 306, 648 P.2d 94 (1982). Plaintiffs' Memorandum in Opposition to Defendants'

Motion For Partial Summary Judgment ¶V.A. at 6-13 regards that “An Express Contract Was Confirmed by The UW Provost and Executive Vice President, Dr. Phyllis Wise.” (CP 82-89). Appellants compared the case law in Marquez with this case. Appellants also Juxtaposed Ford v. Trendwest Resorts, Inc., No. 700699-9, Washington Supreme Court (2002) with this case. (CP 88-89). For the Breach of Contract claim, Appellants have shown this Court that there are genuine issues of material fact remained at the trial and that Appellants have established prime facie case on the claim.

E. Sanctions Under Rules of Appellate Procedure.

In Pages 18 and 19 of the Respondents’ Brief, Respondents argued, “The remainder of the 4-page facts section of Appellants brief lacks citations to the record... and plaintiffs should be sanctioned for their failure to comply with RAP 10.3.” In November 2009, Frances Ju’s son and also Angela Ju’s brother, was hospitalized for more than a week. It made Angela Ju and Frances Ju unable to write the Appellants’ Opening Brief until a few days before the due date. Appellants sincerely apologize for possibly overlooking some citations in the Opening Brief of Appellants. Nevertheless, it is not hard to find out from this Court’s records that Respondents violated RAP 10.2(i) (Brief filed or served late) and RAP 18.5 (failure to serve at or before filing).

The Respondents' most recent violations of the Court rules occurred on January 28, 2010, when Respondents filed Motion For Extension of Time to File Brief of Respondents, Respondents failed to file a Notice of Motion in violation of RAP 17.4(a). It was a repeated, willful violation of the same rule as Respondents committed on April 7, 2009, regarding Case No. 63133-1-I. On April 10, 2009, Commissioner Ellis entered a notation ruling, in which he wrote, "the matter has been scheduled to accommodate respon ". It was apparent that Commissioner Ellis also could not describe the invalid Motion. On January 28, 2010, in addition to making untrue statements in the two Certificates of Service, Respondents also falsely accused Appellants of filing the Opening Brief late while Appellants was in compliance with RAP 18.6(c).

This Court did not impose sanctions against Respondents when RAP 18.9 applied to Respondents. Appellants did not do a perfect citation job in the Opening Brief because Appellants' family member had been hospitalized for more than a week. Appellants respectfully ask that this Court deny Respondents' request.

F. Appellants Only Waited One Month to Challenge Judge McCarthy's Objectivity.

In Pages 3 and 33 of the Respondents' Brief, Respondents wrote about "affidavit of prejudice" and RCW 4.12.050. On Page 3,

Respondents stated, “Plaintiffs accused Judge McCarthy of being biased in favor of the University because he served as an adjunct professor in the law school. They did not file an affidavit of prejudice, and an adverse ruling, without more, is insufficient to establish bias.” In Page 33, Respondents cited State v. Dominguez, 81 Wn. App. 328-29, 914 P.2d 141 (1996), “a party claiming prejudice or bias must support the claim with evidence of a judge’s actual or potential bias because prejudice is not presumed as it is under RCW 4.12.050.”

RCW 4.12.050 regards Affidavit of prejudice. It states, “Any party to or any attorney appearing in any action or proceeding in a superior court, may establish such prejudice by motion, supported by affidavit that the judge before whom the action is pending is prejudiced against such party or attorney, so that such party or attorney cannot, or believes that he or she cannot, have a fair and impartial trial before such judge...” Angela Ju “googled” the Honorable Harry McCarthy right after she returned to Los Angeles after the May 15, 2009 hearing. The time stamps on Appendices B and C of the Opening Brief of Appellants were 2:16 a.m. and 1:46 a.m. on 5/16/2009. After Angela Ju learned about Judge McCarthy’s “teaching in the Trial Advocacy program at the University of Washington School of Law”, Appellants found the case law in Chicago, M., St. P. & P. R.R. v. State Human Rights Comm'n, 87 Wn. 2d 802, 810,

557 P.2d 307 (1976). In Chicago, Milwaukee, one of the members of the tribunal, which was appointed by the Human Rights Commission, was in the process of applying for a job with the Commission. The court ruled that the appearance of fairness had been violated. Chicago, Milwaukee at 810. The Court found these facts to be distinguishable.

In Page 34 of the Respondents' Brief, Respondents stated, "She has made no allegation or submitted any proof of any financial or other interest of Judge McCarthy in the outcome of this case." It is unnecessary to argue and is apparent that an employment always involves "financial or other interest."

On May 26, 2009, the Presiding Judge of the Superior Court, the Honorable Bruce Hilyer, issued an Order on Transfer of Individual Judge Assignment. The case was transferred to the Honorable Theresa B. Doyle. The purpose of RCW 4.12.050 Affidavit of prejudice is for a party to "have a fair and impartial trial" before a certain judge. The trial was scheduled to start on August 10, 2009. With the May 26, 2009, Order, Appellants did not have to file an Affidavit of prejudice.

In Page 35 of the Respondents' Brief, Respondents stated, "Angela waited until December 4, 2009, nearly twelve months, to challenge Judge McCarthy's objectivity." This is an untrue statement. The June 26, 2009, Motion For Discretionary Review ¶E.7. at 16-20 is regarding "Wasn't It

Judge McCarthy's Duty to Recuse Himself Immediately After The Case Was Reassigned to Him?" The time stamps on Appendices B and C of the Opening Brief of Appellants showed that Appellants "googled" Judge McCarthy on May 16, 2009. Appellants only waited one month, instead of "nearly twelve months" as Respondents claimed, to challenge Judge McCarthy's objectivity.

C. CONCLUSION

For the reasons stated herein and in the Opening Brief of Appellants, it is evident that Defendants breached four contracts and that Appellants have presented sufficient evidence to create a genuine issue of material fact remained at the trial. Appellants respectfully request that this court reverse and remand the case to the Superior Court. The six orders that were issued by Judge Harry McCarthy should also be reversed and remanded to the Superior Court because there was significant conflict of interest involved.

DATED this 26th day of March, 2010.

Respectfully Submitted,


ANGELA JU and FRANCES DU JU
Appellants pro se

CERTIFICATE OF SERVICE BY MAILING

I, Angela Ju, hereby certify under penalty of perjury of the laws of the State of Washington that on **March 26, 2010**, I served the foregoing Reply Brief of Appellants on the following named persons by **Certified**

Mail:

Michael F. Madden, Esq.
Marie Westermeier, Esq.
Bennett Bigelow & Leedom, P.S.
1700 Seventh Ave., Suite 1900
Seattle, WA 98101-1397



Angela Ju
Appellant pro se

APPENDIX 1

PLAN DEL CURSO
PROGRAMA DE TACOMA
ENERO-MARZO 2006

	LUNES	MARTES	MIERCOLES	JUEVES	VIERNES
8:30 – 9:30	Gramática	Gramática	Gramática	Gramática	Gramática
9:30-9:45	Descanso	Descanso	Descanso	Descanso	Descanso
9:45- 11:00	Conversación	Conversación	Conversación	Conversación	Conversación
11:00-11:30	Merienda	Merienda	Merienda	Merienda	Merienda
11:30-1:30	Cultura cubana	Seminario/ Investigación	Cultura cubana	Seminario/ Investigación	Cultura cubana (field trips)

Small groups for research

UNIVERSIDAD CARLOS RAFAEL RODRIGUEZ (CIENFUEGOS, CUBA)

Coordinadora general y decana de las Humanidades: Dra. Marianela Morales Calatayud

Coordinadora de clases de cultura: Dra. Lilia Martín Brito

Coordinadora de clases de lengua: Marisol Martínez Iglesias

Profesores de Cultura cubana: Dra. Lilia Martín Brito, MsC. Esperanza Díaz Díaz, Dra.

M. Caridad Bestard, Lic. Dictinio Díaz, Lic. Jorge Luis Lanza, Lic. Odalis Medina

Profesores de lengua española: Marisol Martínez Iglesias, Oscar Alfonso Pacío

General Information About Your Program of Study:

The courses you are taking have been tailor-made for students from UW. The program is intensive by nature, and represents a full-time course of study (15 credits). It is intended to immerse you in Cuban culture and the Spanish language. You will not be taking classes with Cubans or with other international students, but you will have daily social contact with them at the university and you are encouraged to participate in university-wide social activities as much as possible. The program of study consists of Spanish language classes at the appropriate level for each student (from beginner to advanced intermediate), focusing on grammar and conversation. You will also have classes on Cuban culture, taught from an interdisciplinary perspective. If at all possible, we encourage you to take the culture classes in Spanish to improve your language skills. For those who are not able to follow the lectures and discussions in Spanish, you will have an English-speaking interpreter who will accompany the professor in class. We hope that by the time the program ends, everyone can understand enough Spanish so that the interpreter is not needed anymore. The Spanish language classes and Cuban culture classes are closely related so that you will learn vocabulary and grammar that will help you understand and participate in the culture classes, and many of the activities and exercises from the language classes will contain material covered in the culture classes. Your main textbooks for the culture classes are in English so you can read them at home as homework and have a sufficient background to understand the professors who discuss various aspects of Cuban history and culture. As much as possible, the professors will work with Spanish translations of the texts (or fragments of the text) to help you reinforce

your Spanish language skills. You will also have some excursions around Cienfuegos to help you put your Spanish and cultural knowledge into immediate use, and there are two obligatory weekend excursions (to Havana and Trinidad) that will complement your classroom experiences.

Textbooks and Other Resources

A. Bring from home:

The José Martí Reader

The Che Guevara Reader

The Cuban Revolution Reader

The Cuba Reader

A Spanish-English dictionary

Your laptop, if you have one (optional, not required)

Notebooks, writing instruments

B. Provided in Cienfuegos

Materials for the Spanish classes (workbook, textbook, cd)

Evaluation and Grading

You will receive one final grade for the class using the UW grading system, but to arrive at this final grade, we will take the following components into consideration:

34 % work done in Spanish language classes (grammar and conversation)

33% work done in Cuban culture classes (lectures and seminars)

33% work done on independent research project and final paper (in English)

Language classes (grammar and conversation)

You will have homework, class participation, quizzes, short writing assignment, oral presentations, and group work. You will have a final test to show your level of proficiency. The material covered in language classes depends on the level of the class. It ranges from basic introductory phrases and present tense verbs to more complex structures and fine points of grammar. Vocabulary is practical and related to topics you are studying in culture class, as well as daily life in Cuba.

Culture classes and seminars

You have already had some background in Cuban culture and history, but now you will be learning it from the point of view of Cuban professors and you will learn to discuss it in Spanish. In keeping with the pedagogy of immersion programs, classes are conducted in Spanish, but English interpreters will be available to help students who need English explanations. You will have homework, class participation, quizzes, short writing assignments, oral presentations and group work in the culture classes. At the end of the quarter, you will write in Spanish a summary of the work you did for your research project (the length and level of sophistication expected from you will depend on your level of Spanish; it will vary between 2-6 pages.)

Your Cuban professors will evaluate your work, in consultation with your U.S. professors. You will receive regular feedback during the quarter about your performance in class and on homework assignments.

Independent Research Project and Paper (in English)

The English-version of your research paper should be 20 pages long, as we explained in the Preparation for Study Abroad class, and it should follow the guidelines provided. It will be evaluated by your U.S. professors. The deadline for turning in the final draft of the paper is March 13.

Plan de estudio

5 de enero: llegada a Cienfuegos

Viernes 6 de enero: Recepción, Orientación, Ubicación

Semana I (9 – 13 enero)

Cultural themes: First cultures of Cuba and their importance, beginning of the colonization of Cuba, social and economic conditions in the colony until 1790; the work of Fray Bartolomé de las Casas; examples of architecture and art from the 18th century

Semana II (16-20 enero)

Cultural themes: Romanticism and the cultural life of Cuba in the 19th century (until 1868), the evolution of a national consciousness, the idea of nationality and independence; study of representative authors and artists

Excursión 1: Fin de semana en la Habana (21-22 enero) *Hotel Riviera*

Semana III (23-27 enero)

Cultural themes: History from the 10-year war to 1898; repercussions for Cuban culture and the growing social, political and economic divisions between people, patriotic poetry. Evolution of costumbrismo, novels about slavery, analysis of representative works (Cirilo Villaverde, Gertrudis Gómez de Avellaneda, Gabriel del Concepción Valdés –Plácido)

Semana IV (30 enero – 3 febrero)

Cultural themes: José Martí, greatest exponent of Cuban culture in the 19th century; ideas related to Martí's thoughts, his theories of national liberation, anticolonialism, anti-imperialism for Latin America

Semana V (6 –10 febrero)

Cultural themes: Art Deco and Art Nouveau in Cienfuegos; the birth of the Cuban son and trova songs; concert music of the period; artistic and architectural styles of the period.

Excursión 2: Fin de semana en Trinidad/ *Playa* Ancón (11-12 febrero)

Semana VI (13 - 17 febrero)

Cultural themes: Cuban culture in the period 1936-1958 (last stage of the neocolonial era); the critique of that period through essays, speeches and other arts; Fidel Castro's vision of the Revolution in *History will Absolve Me*.

Semana VII (20-24 febrero)

Cultural themes: Analysis and discussion of the impact of the Triumph of the Revolution on Cuban culture, music and dance, cinema and television, radio at the service of national culture.

Semana VIII (27 febrero – 3 marzo)

Cultural themes: New trends in poetry, narrative, theatre, the arts and architecture of the Revolution

Semana IX (parcial; 6-8 marzo)

Cultural themes: Cuba, today

final exams: language and culture classes

9 marzo: salida para Toronto

13 marzo: final paper (in English) due

APPENDIX 2

Faculty Profile



Kima Cargill, Ph.D.

Associate Professor ; Graduate Faculty

Ph.D., Psychology, University of Texas, Austin, 2002.

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Kima Cargill holds a bachelor's degree in philosophy, a master's degree in counseling psychology, and a doctorate in counseling psychology, all from the University of Texas at Austin.

Dr. Cargill teaches courses in existential psychology and psychoanalytic theory. Her research examines the psychological experience of food and culture, specifically how cultural identity and childhood development are mediated by food customs and rituals.

She has published her work in *Food, Culture, and Society*, *Psychoanalytic Review*, and *Psychoanalysis, Culture and Society*, among other publications. She has directed international programs in Cuba and Morocco and has traveled extensively around the world.

Contact Us:
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APPENDIX 3

University of Washington Bothell

Academic Affairs About Us

Vice Chancellor's Biography

Dr. Susan Jeffords joined the University of Washington Bothell in September of 2007 as Vice Chancellor for Academic Affairs where she serves as the chief academic officer and is responsible for advancing the academic and scholarly life of the campus. As the Vice Chancellor, Jeffords oversees academic programs, the [Teaching and Learning Center](#), [Information Technologies](#), the Division of Enrollment Management and Admissions, Student Affairs, the Offices of [Research Support](#) and [Institutional Research](#).

Her accomplishments in that role during 2007-08 include:

- organizing and completing a comprehensive ten-year strategic plan for the campus's academic growth
- development and launching of new science initiative
- restructuring of the Divisions of Enrollment Management and Student Affairs
- development of new initiatives in sustainability, diversity, and educational technologies.

Jeffords instigated strategic planning that resulted in the [21st Century Campus Initiative](#), University of Washington Bothell Priorities Plan 2008-2020. Growth in academic programs, specifically Science, Technology, Engineering and Math (STEM) will result.

Previously she held the position of Vice Provost for Global Affairs for the University of Washington Seattle.

Jeffords served as a faculty member of the English Department before becoming Chair of the Women Studies Department in 1992. In 1995, Jeffords was appointed Divisional Dean for the Social Sciences where she oversaw thirteen departments and supported the development of new interdisciplinary research centers and degree programs.

In addition, Jeffords has led delegations abroad in community-university strategic partnerships and was appointed by the UW president as the Chair of the International Task Force in 1995, which resulted in a university-wide report on the UW's international expertise and current activities. Jeffords also serves on numerous boards that reflect the region's strong international interests.

Jeffords has written and taught broadly in the area of American popular culture, with a particular emphasis on Hollywood film, the Vietnam War, and feminism. She is particularly committed to increasing opportunities for more diverse and underrepresented communities to participate actively in higher education, including expanding opportunities for international engagement.

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