

EXHIBIT

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARLAINA EASTON,

Plaintiff,

v.

COLLEGE OF LAKE COUNTY,
Dr. Jean Kartje and Board of Trustees
of the College of Lake County,

Defendants.

Case No. 07 CV 6127
Judge John W. Darrah
Courtroom 1203
Magistrate Geraldine Soat Brown
Courtroom 1812

DECLARATION OF JEAN KARTJE

I, Jean Kartje, under penalty of perjury, declare that the following is true and correct:

1. I have personal knowledge of the facts set forth in this Declaration.
2. I was Dean of the Communication Arts, Humanities and Fine Arts Division ("Division") of the College of Lake County ("College") from August 2004 to June 2007. In that capacity, I provided leadership and management for this academic Division which offered transfer and career programs serving approximately 10,000 students each semester. There were fifty-two full time and more than one hundred fifty part time faculty. Prior to this, from December 1990 to July 2004, I was the Executive Assistant and to the President of the College. In that position I was a member of the Executive Staff and teamed with the President and Vice-President to advance the educational mission of the College. I was responsible for developing communication pieces and Board meeting materials and the facilitation of community advisory committee reports and the College Governance system.
3. Marlaina Easton was one of the faculty members in the Division when I was Dean.

I recommended her for tenure in January 2005.

4. When I was Dean of the Division, faculty were required to attend the Orientations for the Fall and Spring semesters.

5. Ms. Easton did not attend the Fall 2004 Orientation. She did not consult with me in advance. The reason she gave for missing the Orientation was that she was moving.

6. Joel Chmara missed the Spring 2005 Orientation. He came to me before the Orientation to discuss a scheduling conflict. He was a participant in Def Jam, a literary (poetry) group and had a prior commitment with them to perform. I informed Mr. Chmara that he could miss the Spring Orientation if he would agree to make up those days during the Spring break. He agreed to this arrangement and he did make up the time during Spring break.

7. Unlike Ms. Easton, Mr. Chmara asked in advance if he could be excused from the Orientation. Unlike Ms. Easton, Mr. Chmara missed Orientation for a work-related program. Unlike Ms. Easton, Mr. Chmara made up the time he missed.


8. Ms. Easton's pay was docked for the two days she missed Orientation in August 2004 accordance with Division policy. Her race and national origin had nothing to do with this decision. Nor did I know at that time that Ms. Easton had multiple sclerosis: neither she nor any one had told me that she multiple sclerosis, nor had she taken or requested any time off from class as a result of this condition at or prior to this time.

9. My e-mail to Ms. Easton dated July 6, 2006 regarding her editing and grading by mail was prompted by student complaints that they were not receiving her feedback in sufficient time to incorporate her comments.

10. I did not tell Ms. Easton that she should change her attendance policy because she had multiple sclerosis. I suggested she change her attendance policy to make it less severe and

pointed out that she herself had several absences.

Dated: October 29, 2009


Jean Kartje