

AFFIDAVIT OF FERNE P. WOLF

1. I am of lawful age and, if called, would testify from personal knowledge to the matters stated herein.

2. From early 1995 through mid-1996 I was attorney for Jeffrey Kurtzman in connection with charges of sexual harassment that were being investigated by Washington University.

3. In March 1995, I spoke on the telephone with Michael Cannon and Lori Fox, attorneys for Washington University, regarding the allegations made against Jeffrey Kurtzman and the procedures for conducting the investigation.

4. Michael Cannon stated to me that this was simply an investigative process and not an adjudicative process, that if it were an adjudicative process in which Jeffrey Kurtzman's rights to tenure were in jeopardy, there would be numerous procedures that would have to be followed. He stated that it was an investigation simply to aid the Provost in his determination in what to do about the allegations against Professor Kurtzman. He also stated that a committee had not yet met to determine what procedures it was going to follow, but that the committee was there simply to advise the Provost and it was the Provost who would make the decision in this matter. I asked Michael Cannon for a copy of all sexual harassment policies in effect during the time of the alleged sexual harassment and said he would get me copies of all relevant policies.

5. Subsequent to the conversation described in paragraph 4, I received the documents attached hereto as Exhibit 1, which is a letter from Lori Fox along with enclosures.

6. In September 1995, I received from Jeffrey Kurtzman, the document attached hereto as Exhibit 2. Prior to September 1995, I had never been told of the existence of the procedures for investigating allegations of sexual harassment, as set forth in Exhibit 2.

7. Affiant states nothing further.

I declare under penalty of perjury that the foregoing is true and correct.

Date _____

Ferne P. Wolf