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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

HALEY VIDECKIS and LAYANA WHITE, individuals,

Plaintiffs,

vs.

PEPPERDINE UNIVERSITY, a corporation doing business in California,

Defendant.

Case No. 2:15-cv-00298-DDP (JCx)

JOINT [PROPOSED] SHORT STATEMENT TO BE READ TO JURY

Trial Date: July 18, 2017

Plaintiffs allege that employees of a religious university harassed and discriminated against them on the basis of their sexual orientation. The plaintiffs are Haley Videckis and Layana White. The defendant is Pepperdine University.

Plaintiffs transferred to Pepperdine in 2013 into Pepperdine's women's basketball program as scholarship athletes from other NCAA Division 1 women's basketball programs. Plaintiffs assert that they were subjected to invasion of privacy, harassment, discrimination, and intentional infliction of emotional distress by Defendant's employees and specifically by the head coach of the women's basketball team and his staff, because they were lesbians engaged in a same-sex relationship. Plaintiffs also allege that they were subjected to patterns of mistreatment in an effort to force them to leave the team.

Plaintiffs further contend that there existed a hostile environment at Pepperdine toward LGBT students which supported a deliberate indifference by the administration of the Athletics Department and the University to this alleged conduct, and that they were retaliated against when they complained of the alleged harassing conduct. Plaintiffs contend they were forced off the basketball team and assert that the conduct of Defendant's employees violated the law, and injured them.

Defendant denies each and every one of these allegations and asserts that Plaintiffs voluntarily left the basketball team, and that any conduct of which Plaintiffs complain was engaged in for the purpose of keeping Plaintiffs physically and emotionally safe as required by the applicable standards of care and by NCAA regulations, as well as to effectively manage the women's basketball team and to promote team unity and chemistry. Defendant further asserts that while the environment at Pepperdine was inclusive and supportive of its LGBT students, the environment played no role in any of the conduct or decisions made with regard to Plaintiffs. Defendant also contends that whenever Plaintiffs complained of any conduct engaged in by its Athletics staff, those concerns were promptly and fairly addressed and that there was no retaliation.

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Dated: July 6, 2017

Respectfully submitted,

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By: /s/ JAYESH PATEL
Attorneys for Plaintiffs HALEY VIDECKIS and LAYANA WHITE

Dated: July 6, 2017

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Attestation of Concurrence

I, David R. Hunt, as the ECF user and filer of this document, attest that concurrence in the filing of this document has been obtained from Jayesh Patel.

Dated: July 6, 2017

/s/ David R. Hunt
David R. Hunt

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