

my domestic partner, Jane Schacter, was invited to visit for a semester at the Michigan law school. When the administration of the Michigan law school extended these offers to us, they did so with full knowledge that Jane and I were partners. Dean Jeff Lehman and Associate Dean Suellyn Scarnecchia were enthusiastic about our recruitment.

6. Jane and I visited as professors at Michigan for the fall semester of 1997, and then, as planned, returned to Madison. In the winter of 1998, then Dean Jeff Lehman telephoned and offered Jane and me long-term jobs at the Law School, mine in the Clinical Law Program, supervising a community-based poverty law clinic. Jane and I accepted those jobs, and moved to Ann Arbor in the late summer of 1998, with our newborn son.

7. Jane and I taught at the University of Michigan Law School for two academic years, 1998-99 and 1999-2000. Throughout my employment at the University of Michigan Law School, I found the faculty and administration to be receptive and friendly to both Jane and me. At no time did I sense any hostility toward or bias against homosexuals, nor did I experience any discrimination. Our family was welcome at law school events, and we were frequently invited to colleagues' homes.

8. Jane and I decided to return to Madison, Wisconsin in 2000. This was a difficult decision and was based on our strong personal and professional ties to Madison.

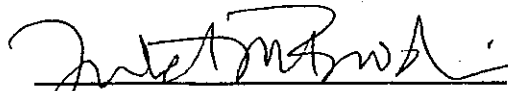
9. When I taught at the University of Michigan, I considered Peter Hammer to be a casual friend. On an approximately monthly basis, we played poker together in a group of other faculty, which included Sam Gross, Deborah Malamud, Nick Rine, Rick Lempert, and Michael Heller.

10. In early 2005, I read Peter Hammer's complaint against the University of Michigan, which he had posted on his website. I was taken aback when I saw the allegations in the complaint and in particular paragraph 22. It was obvious to me that the paragraph referred to Jane and me. Jane and I did not, as the paragraph states, experience any "inhospitable attitude toward individuals with same sex partners."

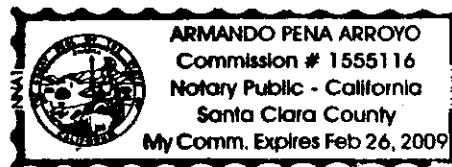
11. A few days after I read Hammer's complaint, I telephoned Peter Hammer and spoke to him for approximately 20 to 30 minutes. The purpose of the call was to communicate to Hammer that Jane and I were upset about the allegations in paragraph 22 because they were wrong, and that we wanted them removed from the complaint. I asked Hammer what the basis for paragraph 22 was. His response was that the paragraph was based upon his "impression." I told him that our decision to return to Madison, Wisconsin had nothing to do with bias or discrimination at the University of Michigan Law School. Hammer said that he would consider our request and would speak to his attorney about it.

12. I have also read pages 258 and 259 of Peter Hammer's deposition testimony in which he was asked whether I had told him that the allegations in the complaint were untrue. In his deposition testimony at page 258, lines 19-21, Peter Hammer denied that I indicated to him or told him that there was an error in what he had alleged in the complaint. This testimony is not accurate. When I spoke to Peter Hammer on the phone, I specifically told him that the allegations regarding Jane and me were false, and that they should be removed from the complaint.

Further, Affiant sayeth not.


Juliet M. Brodie

Subscribed and sworn to before me
this 14th day of February, 2006.
Armando P. Arroyo
Notary Public, Santa Clara County, California
My commission expires:



CALIFORNIA JURAT WITH AFFIANT STATEMENT

State of California

County of San Mateo } ss.

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

See Attached Document

Armando Pena Arroyo
Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

Subscribed and sworn to (or affirmed) before me on this

14th day of February, 2006, by
Date Month Year

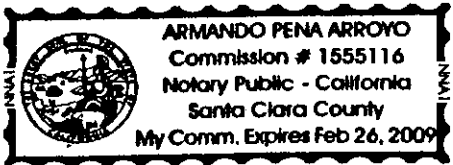
(1) _____
Name of Signer

- Personally known to me
- Proved to me on the basis of satisfactory evidence to be the person who appeared before me (.)+;

(2) Juliet M. Brodie
Name of Signer

- Personally known to me
- Proved to me on the basis of satisfactory evidence to be the person who appeared before me.)

Armando Pena Arroyo
Signature of Notary Public



Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: Affidavit of Julie Brodie

Document Date: Feb 14, 2006 Number of Pages: 3

Signer(s) Other Than Named Above: _____

