

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

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STEPHANIE BIEDIGER, KAYLA LAWLER,	:
ERIN OVERDEVEST, KRISTEN	:
CORINALDESI, and LOGAN RIKER,	:
individually and on behalf of all those	:
similarly situated; and	:
ROBIN LAMOTT SPARKS, individually,	:
	:
Plaintiffs,	:
	:
against	:
	:
QUINNIPIAC UNIVERSITY,	:
	:
Defendant.	:
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CIVIL ACTION NO:
3:09-CV-00621 (SRU)

MARK A. THOMPSON, PhD declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Senior Vice President for Academic and Student Affairs at Quinnipiac University, and I submit this declaration in support of Quinnipiac’s Motion to Lift the Court’s Injunction.

Roster Sizes and Undergraduate Enrollment

2. In 2011-12, Quinnipiac has and/or plans to have 314 female athletes (65.01%) and 169 male athletes (34.99%). A chart detailing how many male and female athletes participated and/or plan to participate in varsity athletics in 2011-12 is attached hereto as Exhibit A. The numbers reflected in this chart are the actual number of athletes on each team as of the first date of competition for all teams other than acrobatics and tumbling and outdoor track and field,

which have not yet completed their first date of competition. The numbers for these two teams are the approved roster numbers.

3. The undergraduate population in 2011-12 was comprised of 3,735 women (62.37%) and 2,253 men (37.63%).

4. In 2010-11, without counting acrobatics and tumbling athletes, Quinnipiac had 264 female athletes (61.54%) and 165 male athletes (38.46%).

5. The undergraduate population in 2010-11 was comprised of 3,700 women (63.15%) and 2,159 men (36.85%).

Women's Golf Team

6. Quinnipiac added a varsity women's golf team that began competing in the 2010-11 academic year.

7. Quinnipiac employs a women's golf coach; the golf coach conducts off-campus recruiting for the team; the University provides scholarships to aid in recruiting golf athletes; the golf team competes against other collegiate varsity teams; the golf team practices for competitions; and, the University provides athletes on the golf team with the many benefits that come with being a varsity athlete at the University (*e.g.*, power hours, medical assistance, training, community service).

Women's Rugby Team

8. Quinnipiac added a varsity women's rugby team that began competing in the 2011-12 academic year.

9. Quinnipiac hired a rugby coach and created a women's rugby team in the 2010-11 academic year, so the team could begin practicing and competing in scrimmages against other collegiate teams as preparation for competition as a varsity team in 2011-12.

10. The University provided scholarships to aid in recruiting rugby athletes for the 2011-12 academic year; the rugby team competes against other collegiate varsity and club teams; the rugby team practices for competitions; and, the University provides athletes on the rugby team with the many benefits that come with being a varsity athlete at the University (*e.g.*, power hours, medical assistance, training, community service).

11. Although there are currently only five varsity rugby teams in the NCAA, Quinnipiac competed in a significant number of matches against these varsity teams and had other matches against well-established club teams that provide formidable competition.

Women's Track and Field Teams

12. On September 24, 2010, Quinnipiac notified its coaches and all student athletes, including the women's cross country, indoor track and field and outdoor track and field teams, in writing of its policy that no student is required to participate in one sport in order to participate in a different sport. Quinnipiac reminded all coaches of this policy in its 2011-12 Athletics & Recreation Staff Policy Handbook.

Acrobatics and Tumbling

13. During 2011-12, the A&T team will compete exclusively under the well-established rules created by the National Collegiate Acrobatics and Tumbling Association ("NCATA").

14. The NCATA has by-laws and enforcement mechanisms for ensuring teams follow the rules set forth by the NCATA. Furthermore, the NCATA has partnered with USA Gymnastics such that all NCATA meets are sanctioned by USA Gymnastics.

15. The A&T team competes exclusively against collegiate varsity teams that are members of the NCATA.

16. Quinnipiac's team participates in a progressive championship under NCATA rules.

17. Mary Ann Powers, the coach of Quinnipiac's A&T team, conducted off-campus recruiting for the 2011-12 season.


MARK A. THOMPSON

12/20/11
DATE

EXHIBIT A**2011-12 Athletic Participation***

	Male Participants	Female Participants
Basketball	18	15
Baseball	31	
Field Hockey		22
Soccer	25	24
Tennis	10	11
Lacrosse	44	30
Cross Country	13	24
Ice Hockey	28	27
Indoor Track and Field		33
Outdoor Track and Field		35
Softball		16
Volleyball		14
Golf		11
Acrobatics & Tumbling		32
Rugby		20
Total	169 (34.99%)	314 (65.01%)

* These numbers include three athletes on the men's lacrosse team who have exhausted their eligibility under NCAA rules (and therefore do not participate on the team), but are still receiving athletic scholarships from Quinnipiac. These numbers also include one female athlete who receives an athletic scholarship from the ice hockey team, but no longer participates on that team – she is also a member of the women's golf team, and counts as a member of that team as well.