

FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JOHN A. MULVEY,

Plaintiff,

vs.

THOMAS E. PEREZ, in his  
official capacity as  
Secretary of Labor,  
United States Department  
of Labor,

Defendants.

Case No. 3:14-cv-01835

Magistrate Bryant

Teleconference Deposition of:

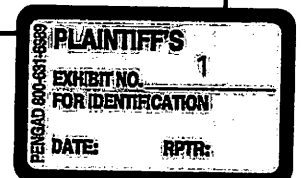
STANLEY KEEN

June 21, 2016

Taken on behalf of the Plaintiff

BRIGGS & ASSOCIATES COURT REPORTING  
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APPEARANCES

1 For the Plaintiff:  
2 JEFFREY S. FRENSLEY  
3 Attorney at Law  
4 40 Music Square  
5 Nashville, TN 37203

6 For the Defendants:  
7 DELK KENNEDY  
8 Attorney at Law  
9 110 Ninth Avenue South  
10 Suite A-961  
11 Nashville, TN 37203-3870

12 ROLANDO VALDEZ (via teleconference)  
13 Attorney at Law  
14 200 Constitution Avenue NW  
15 Suite N-2420  
16 Washington DC, 20210

17 Also present:  
18 JOHN MULVEY  
19  
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25

1 you about earlier and make sure I understood this. With  
2 respect to the evaluations and the year-end bonuses, do  
3 you recall we had a conversation about that?

4 A. Yes.

5 Q. And I wanted to make sure that I understood  
6 it was your practice not to give year-end bonus to anyone  
7 who had "effective" or less as an overall evaluation; is  
8 that correct?

9 A. I've never given a bonus to someone who got a  
10 min sat.

11 Q. I'm sorry. A what?

12 A. A minimally satisfactory.

13 Q. Okay. All right. And, as I understand the  
14 evaluation process, a "needs improvement" on any of the  
15 criteria will result in a minimally satisfactory rating on  
16 the overall evaluation, correct?

17 A. That's how I understand it.

18 MR. FRENSLEY: Okay. Let's take  
19 another quick break right here.

20 (A brief break was observed.)

21 BY MR. FRENSLEY:

22 Q. Mr. Keen, we're back on the record after a  
23 short break. I just want to follow up on a couple of  
24 other areas, and I think we're about done here.

25 It's my understanding that, within the

1 STATE OF TENNESSEE )  
2 COUNTY OF WILLIAMSON )

3 I, LINDA WORLEY, LCR, Licensed  
4 Court Reporter in and for the State of Tennessee at large,  
5 DO HEREBY CERTIFY that the  
6 foregoing was taken at the place set forth in the caption  
7 thereof; that the proceedings of said were  
8 stenographically reported by me in shorthand; and that the  
9 foregoing pages constitute a true and correct  
10 transcription of said proceedings to the best of my  
11 knowledge, skills and ability.

12 I DO FURTHER CERTIFY that I am not  
13 related to nor an employee of counsel or any of the  
14 parties to the action, nor am I in any way financially  
15 interested in the outcome of this action.

16 IN WITNESS WHEREOF, I have  
17 hereunto affixed my official signature and seal of office  
18 July 10, 2016, at Brentwood, Tennessee.

19  
20  
21  
22  
23 \_\_\_\_\_  
24 Linda Worley, LCR  
25 LCR #124, Expires 6-30-16