

# Exhibit 2

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

---

ELIZABETH LAURA CHOIKE, ASHLEY  
GUINEVERE STONER, HEATHER  
WALBRIGHT, JESSICA STUDENT, JENNIFER  
VENET, ELIZABETH PENNING, LAURA A.  
SANFORD, EMILY C. CAMPBELL, REBECCA  
ZINN, ALISON NICOLE NUCKOLS, SARAH S.  
SANDER, and RACHEAL BIENIAS, on behalf of  
themselves and all similarly situated individuals;  
and JAMES V. YEAMANS,

Plaintiffs,

v.

SLIPPERY ROCK UNIVERSITY OF  
PENNSYLVANIA OF THE STATE  
SYSTEM OF HIGHER EDUCATION;  
ROBERT SMITH, in his official capacity as  
President of Slippery Rock University; and  
PAUL LUEKEN, in his official capacity as  
Director of Athletics of Slippery Rock University,

Defendants.

---

Civil Action No. \_\_\_\_\_

DECLARATION OF ASHLEY STONER

I, Ashley Stoner, hereby declare:

1. I am a sophomore field hockey and softball player at Slippery Rock University.
2. I came to Slippery Rock on a field hockey scholarship of \$1,000/year. I was recruited by the field hockey coach while at a Slippery Rock away game at Shippensburg. I visited Slippery Rock, took a tour of the campus, had dinner with the team, and got to know them.

3. I graduated from Central Dauphin High School near Harrisburg, Pennsylvania. In high school, I played varsity field hockey and varsity softball, as well as soccer and basketball. I was named Most Valuable Player of the high school varsity field hockey team in my senior year. I also got the Leadership Award as captain of the field hockey team.

4. By the time I started looking at colleges, I knew I wanted to play field hockey. I also knew I wanted to major in Physical Education. Whether a school offered a Phys Ed major was the most important consideration in my choice of college. But whether a school had a field hockey team was, if not tied for first, a very close second.

5. I turned down offers from a number of other schools, including Montclair State in New Jersey, Mercyhurst in Erie, and several others. Some of these other schools made me better offers than Slippery Rock did, but I just did not click with the teams at those other schools as well as I did with the Slippery Rock team.

6. I was a starter on the varsity field hockey team at Slippery Rock all last year and this year. I play a center position, so I am a very active player on the field. I try to be a leader on our team and help the other players work out any problems they are having with each other.

7. I decided to join the softball team at the last minute. Another field hockey player encouraged me to join. I started seven out of 16 games this past year.

8. I would definitely continue to play both field hockey and softball if both sports were offered.

9. The field hockey team is the center of my life at Slippery Rock. I have really gotten to know the rest of the team well. We spend a lot of time practicing and playing,

and we are always together, so you can get as close as a family to the other team members. Being on the team has really helped me manage my time better, and has kept me on track with my studies. The field hockey players generally have better grade point averages than the other teams. If someone is struggling in a subject, the older girls on the team help them.

10. Slippery Rock does not give the field hockey team much in the way of equipment, supplies, or support. We get uniforms, but the uniforms are short skirts and razor-back tank tops, and because we are in northern Butler County, sometimes it is hailing when we are on the field. The school does not provide us with any long-sleeved undershirts. Also, we do not have any long sleeve or pants, for example sweats to wear to and from games. We have to provide them ourselves. We also have to buy our own hockey sticks, mouth guards, and shoes.

11. The field hockey team has to travel to our away games in a mini bus or shuttle bus. The bus is not big enough to fit everyone. There are 22 team members and two coaches. We have to sit five across. The bus is completely jam-packed, and there is no understorage, so we have to crowd in with our sticks and shin guards and the rest of our equipment. There are no bathrooms on the bus. Some trips take four to five hours, and by the time I get off the bus, my neck and back hurt from being cramped for so long. Other teams get to travel in charter buses.

12. The field hockey team plays on the turf in the football stadium, which is in excellent condition. Before we were allowed to play there, the team had to play on a field that was in such bad shape that it was dangerous. It had potholes and no grass. We have had to play on that field twice since I have been on the team because of scheduling

problems at the football stadium, and it is scary. If the ball hits a pot hole, it can bounce up into your face, or you can sprain your ankle.

13. The downside to playing on the football field is that we are treated like guests. Even though our time on the turf is scheduled in advance, the football team comes on the field and throws the football around while we are trying to practice. We are treated like the field is not really our field. The concession stands in the stadium are always open for football games but never open for our games. We do not have media guides (which are pamphlets with our schedule and roster), the mascot does not show up, and we do not have special prizes to give out, like the football team has mini footballs.

14. The other downside to playing on the football field is that the field hockey locker room is in the Field House, which is nowhere near the football stadium. It is a ten- to fifteen-minute walk from the stadium, so it requires driving, especially because we have a meeting there and then go to the game. We have to haul huge bags full of balls, sticks, shin guards, shoes, jerseys, goalie's pads, cones, and other equipment to and from the Field House to the stadium whenever we practice.

15. Softball is a Tier 1 sport. That means that the school theoretically considers it in the same category of importance as football, baseball, or men's basketball. But softball is not treated anywhere near as well as baseball or the other men's Tier 1 sports.

16. The softball field is a pretty long distance away from the center of campus. The fences around the softball field are not permanent. They are breakaway fences that can be taken down, and they blow down in the wind. The softball field is nowhere near as nice as the baseball field and stadium. The baseball team has a grounds crew that keeps its field perfect. The softball team has no grounds crew, and we team members

often have to do the fieldwork ourselves. In fact, as recently as the weekend of April 1, 2006, we had to arrive at 8:00 AM to get the field in shape for a 1:00 PM game. When you groom a field, you roll out a tarp and put sandbags on it to hold it in place; that keeps the rain off the infield. Then the next morning, you brush the water off the tarp with a broom and roll it up. Then the coach goes around with a tractor and you broom the field again. Then the lines have to be marked on the field. It can take hours to groom a field to prepare it for a game.

17. The electricity at the softball field is supplied by a generator that sometimes runs out of gas before the end of the game. This year the generator just stopped working. The scoreboard sometimes goes blank in the middle of a game. The sound system at the softball field is not good. It is crackly and hard to hear, and the quality is so bad you cannot play music over it. Fans who sit along the first base line complain because they can not hear who is up to bat. The baseball sound system is much better. It is so loud and clear that even though the baseball stadium is a good distance away from the softball field, we can hear their music while we are warming up.

18. The baseball stadium has nice seating for a big crowd. The softball field has two sets of bleachers that are in bad shape. If you hit a foul ball at the softball field, it can land in thorny brush that makes it impossible to retrieve the ball. The baseball team has a beautiful new locker room right in the stadium where they play. The softball locker room is located in a house off-campus that is up the hill from the field.

19. The school provides softball players with two short-sleeved jerseys and a tank jersey, two sets of pants, cleats, and socks. We also get a discount on gloves. We asked for underarmor, which is like an undershirt, sports bras and sliding shorts, but our request

for these items was denied. We even heard that the football players get a new helmet every year whether they need it or not.

20. The softball trainers are supposed to be at all of our practices, but sometimes they do not show up, and we have to stop practicing and leave to get a bag of ice or whatever else a player needs from our locker room if someone gets hurt.

21. The school hardly publicizes the softball team. There are no promotions, no mascot, and no cheerleaders at our softball games. Recently there was a sale at the box store advertising a free baseball t-shirt and mini bat for purchases over \$40.

22. At the beginning of this year, rumors were flying around the Student Athlete Advisory Committee that sports were going to get cut. Our field hockey coach told us not to worry about it, and that we should not cause a ruckus if nothing was going to happen to us.

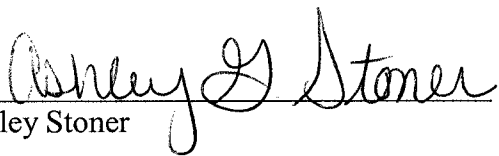
23. In January 2006, I got a text message telling me to come to a meeting with the field hockey coach, where we were told that our team had been cut and we would not be playing next year. We met with the Athletic Director Paul Lueken, President Bob Smith, and Vice President Bob Watson. We asked a lot of questions that never got answered. We tried to find out why our sport had been cut. We offered to raise money to keep it, but they told us not to try, and that we would have to raise millions by July 1 to keep field hockey from being cut.

24. With field hockey gone, I do not know what I am going to do next semester. Luckily, I can still play softball, but I will probably never play field hockey competitively again. I am considering the possibility of transferring to another school that offers field

hockey, though it would be a real hardship to transfer. Slippery Rock has a good Phys. Ed. Program, and I am comfortable here. But it is still possible that I would leave Slippery Rock so I could play field hockey at another school.

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

Executed on May 9, 2006.

  
\_\_\_\_\_  
Ashley Stoner