

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS**

SHENITTA EWING,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:16-cv-02641
)	
UNITED PARCEL SERVICE, INC.)	
)	
Defendant.)	

DECLARATION OF DENYSE WHITING

I, Denyse Whiting, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am over the age of eighteen (18) years old. I make this declaration voluntarily and based on my own personal knowledge.

2. I am a Caucasian female. I used to work as a Training Specialist for United Parcel Service, Inc. (“UPS”), at 10881 Lowell Avenue, Overland Park, Kansas 66210.

3. I was employed by UPS from approximately June 18, 2012 until November 19, 2016. My responsibilities included training employees on analyzing, interpreting, and inputting client data in UPS’s system.

4. When I worked for UPS, my hair color was always medium auburn brown. A true and accurate representation of my hair color during the time I worked at UPS is reflected in the photographs attached to this declaration labeled UPS 00549-00550. Those photographs are not altered or filtered.

5. I reviewed certain photographs of me produced in this litigation, particularly two photographs labeled Ewing 0000013 and Ewing 0000014. Those photographs are not true and accurate representations of my hair color at the time I worked for UPS. The color in those photographs (Ewing 0000013 and Ewing 0000014), including my hair color, were altered with

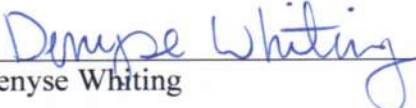
filters available through my mobile phone application prior to me posting them on “Instagram.” I periodically filter photographs of myself before posting them. Those altered/“filtered” photographs (Ewing 0000013 and Ewing 0000014) depict my hair color much brighter than my hair color actually was at the time the photographs were taken.

6. At no time when I worked for UPS was my hair color the same color as the color depicted in Ewing 0000013 and Ewing 0000014.

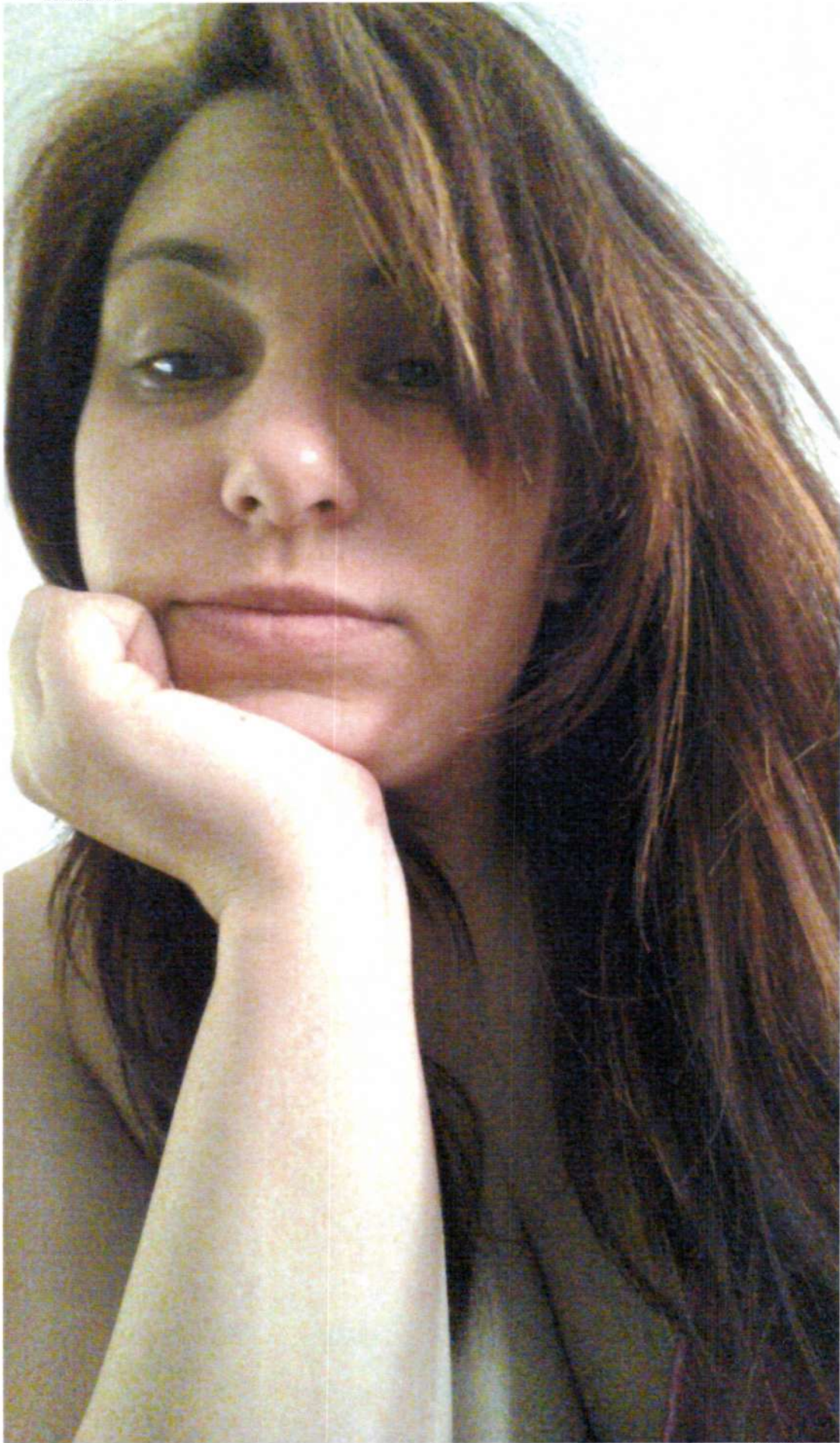
7. I was not offered any benefit or reward to make this declaration. I was also not threatened with reprisal or with retaliation if I refused to make this declaration.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This declaration is executed this 17th day of October, 2017.


Denyse Whiting

CONFIDENTIAL



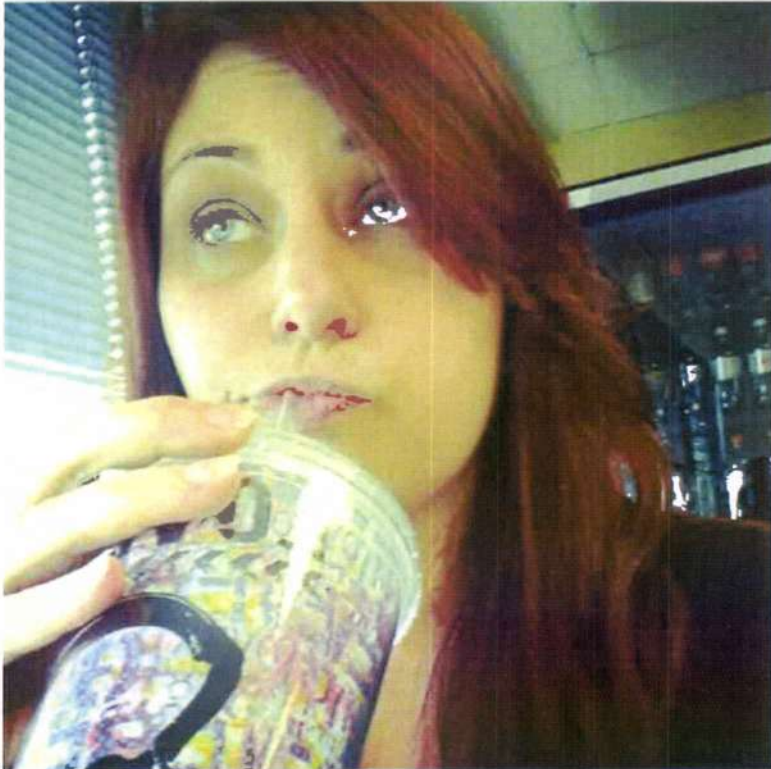
CONFIDENTIAL





luv2hate_cali

82w



28 likes

luv2hate_cali what a day already..

iamsckoolboy On break pretty early lol

laurensierraaa those eyes, those eyes, make the stars look like they're not shiningggggggg

Like Comment



Ewing 0000013

 luv2hate_cali 🕒 91w



👍 29 likes

luv2hate_cali Let's get this Friday Eve over with!! I'm ready for the weekend!! 🤔

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chantal.adjoavi 🙄🙄🙄🙄🙄🙄🙄 I don't know you and was never a part of this convo 🙄🙄🙄

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