IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION

Ramsi A. Woodcock,

Plaintiff,

v.

The University of Kentucky et al.,

Defendants.

Case No. 5:25-cv-00424

Honorable Danny C. Reeves

Memorandum of Law in Support of
Motion for Preliminary Injunction and Expedited Consideration

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Other Authorities

The plaintiff, Ramsi Woodcock ("Prof. Woodcock" or "Plaintiff"), through undersigned counsel, respectfully requests entry of an order enjoining Defendants, the University of Kentucky, Eli Capilouto, Robert DiPaola, William Thro, and James Duff (collectively "Defendants") from (a) continuing to "reassign" him from his position as a professor in the College of Law, (b) barring him from the College of Law building, and (c) subjecting him to a disciplinary investigation for his constitutionally protected speech. Plaintiff further requests that the "reassignment" be enjoined before the start of the spring 2026 semester on January 12, 2026, as his next opportunity to teach would not be until the fall semester starts in August 2026. In support of such request, Plaintiff states as follows:

INTRODUCTION

In this case, Plaintiff challenges Defendants' attempt to treat Israel as a protected class in order to silence a particular point of view. The suspension, ban, and investigation violate Professor Woodcock's rights to due process of law and freedom of speech. Professor Woodcock's speech is academic speech or speech as a private citizen about matters of public concern. Defendants took punitive action against Professor Woodcock in response to that speech and have no legitimate interest in punishing or investigating Plaintiff for his speech. And their reliance on a definition of antisemitism that embeds viewpoint discrimination into its meaning does not count as a legitimate interest, even if the Department of Education and a Kentucky statute insist on its use. Second, Defendants' suspension of Plaintiff from his tenured full professorship, banishment from the College of Law building, exposure to a bad faith investigation, and public ostracism are deprivations of property and liberty interests without due process of law, as no process whatsoever preceded those actions.

Plaintiff seeks injunctive relief to prevent further irreparable harm resulting from his suspension, ban from the College of Law, and investigation. He previously formally requested the relief sought herein directly from the University through Defendant Thro and was refused.

STATEMENT OF FACTS

Professor Ramsi Woodcock is a tenured full professor at the College of Law who has written extensively in the field of law and economics, teaches international law, and has an emerging scholarly interest in decolonization and Palestine. Exhibit A at ¶¶ 1, 34. His research in this area has led him to the conclusion that Israel is a Western colony that practices apartheid and is currently committing genocide. Exhibit A at ¶¶ 14, 43. He argues that, based on a historical record of more than 80 cases of decolonization in the 20th century, war against Israel is a justified means of decolonizing Palestine. Exhibit A at ¶¶ 14, 43. In his view, there can be no international norm against Western colonization unless the native population enjoys an exclusive right of self-determination within the decolonized territory. Exhibit A at ¶¶ 12, 43.

Accordingly, Professor Woodcock's view is that the only group having a right of self-determination in Palestine are the Palestinians—a multifaith group of Muslims, Christians, and Jews consisting of the descendants of those who lived in Palestine before the arrival of the first settlers from Europe about a century ago. Exhibit A at ¶ 12. One implication of this view is that Jewish people as a group do not have a right of self-determination in Palestine based on an ancient, biblical claim. *Id.* Rather it is the descendants of Jewish people who lived in Palestine on the eve of Western colonization who share in the Palestinian right of self-determination as Palestinians. *Id.*

Professor Woodcock has disseminated his views in person and online. Starting in February 2024, Professor Woodcock spoke about his conclusions at conferences and in online discussion groups and listservs for law professors. Exhibit A at ¶¶ 6-8, 14. He set up a website to start a scholarly movement about his views, and circulated petitions about them. Exhibit A at ¶¶ 14, 38. Professor Woodcock does not hold a public relations title at the University, is not an administrator, and could never have been reasonably understood to speak on behalf of the University when he spoke at academic

conferences, on his personal website, and on law faculty listservs. Exhibit A at ¶ 13; Exhibit E at ¶ 2; Exhibit F at ¶ 10; Exhibit D at ¶¶ 5, 8.

On July 18, 2025, nearly a year and a half after Professor Woodcock started publicizing his views, Defendants responded by: (1) publicly condemning his speech as "repugnant" and "express[ing] hate," falsely characterizing it as calling for "the destruction of a people," and stating that it "can be interpreted as antisemitic in accordance with state and federal guidance"; (2) investigating him in contemplation of terminating his employment; (3) suspending him from teaching, research, and service; and (4) banning him from the College of Law building. Exhibit A ¶¶ 30-33; Woodcock Exs. 16-19; Exhibit C at ¶¶ 2, 3,4, 5. None of these actions were preceded by any hearing or other process. *Id.*; Exhibit B at ¶ 4; Exhibit B Ex. 2. Faculty in the College of Law were left out of the decision-making, even though shared governance is "a bedrock principle and a value of the University." Exhibit J at ¶ 3; Exhibit E at ¶ 5. Exhibit A at ¶ 23; Exhibit A Ex. 9. Defendants have indicated that they intend to continue Professor Woodcock's suspension and law building ban into next semester. Exhibit B at ¶ 9; Exhibit B Ex. 7.

After Professor Woodcock's lawyer wrote to the University noting that its internal processes were not being followed, particularly its policy on suspension or reassignment of faculty members and investigations preceding termination proceedings, the University abolished that policy. Exhibit B at ¶ 3; Exhibit B Ex. 1; Exhibit A at ¶¶ 26-27; Exhibit A Ex. 12 at p. 10, Ex. 13.

University Defendants have made eight allegations against Professor Woodcock to which they point as grounds for the suspension, banishment, and investigation. Exhibit A Ex. 19; Exhibit C ¶ 5; Exhibit C Ex. 3. All involve speech about Israel or Palestine. The University's pretext for launching the investigation, outlined in a July 22, 2025 Notice of Investigation, were expressions of dissatisfaction by four professors, apparently at other schools, who had attended conferences in Washington, D.C. and Hong Kong or participated in nationwide online discussion groups for law

professors alongside Professor Woodcock and happened to disagree with his views. Exhibit A at ¶ 33; Exhibit A Ex. 19. Although the allegations in the July 22 Notice made no claims about Professor Woodcock's teaching or other interactions with students or other members of the University community and did not point to a single report of harassment of any member of the University community, much less the pattern of harassment required to violate Title VI, the University declared that "[t]his investigation addresses requirements under Title VI of the Civil Rights Act of 1964." *Id.*

Two of the allegations involve statements at academic conferences. The University alleges that Professor Woodcock began a presentation at an academic conference in Hong Kong on May 30, 2025 "with a tirade against the United States and its 'colony' for coming [*sic*.] genocide in Gaza" and responding to a question by "chanting 'apartheid, apartheid, apartheid.'" Exhibit A Ex. 19. In fact, Professor Woodcock prefaced remarks on a general theory of antitrust with a brief statement of opposition to Israeli colonization and genocide. Exhibit A at ¶ 8. The panel continued without incident until about an hour later when a heckler accused him of being a Hamas supporter. Professor Woodcock replied that the international law doctrine of "responsibility to protect" authorizes military intervention to stop genocide and that Israel is a colonization project that practices apartheid and commits genocide. *Id.*

The University further alleges that at an academic conference in Washington, DC on February 23, 2024, Professor Woodcock asserted that "the United States government was supporting Israel in what was alleged to be a genocide of the Palestinian people." Exhibit A Ex. 19. The University claims that "[a] number of other law professors" walked out and the Dean of the George Mason University Law School publicly stated "that your conduct during this professional conference was inappropriate." *Id.* In fact, Professor Woodcock gave the following 30-second statement, which was similar to the one he later gave in Hong Kong: "Our government is currently committing genocide in Palestine through the colony we maintain called Israel. We have killed 30,000 people so far and nearly 15,000 children,

and that must stop." Exhibit A at ¶ 8. George Mason has maintained a video recording of the panel, including Professor Woodcock's remarks about Israel, on a school YouTube channel for more than a year. *Id.* The panel continued without incident and Professor Woodcock fielded questions on antitrust from the audience, including one from Judge Douglas Ginsburg of the United States Court of Appeals for the District of Columbia Circuit. *Id.*

Two of the allegations relate to online discussion. The University alleges that Professor Woodcock "spammed" listervs, including "the Association of American Law Schools (AALS) listserve [*sic*.], which you have access to as a University of Kentucky Law Professor, with your personal viewpoints concerning the Israeli-Palestinian conflict." Exhibit A Ex. 19. Professor Woodcock first shared his views regarding Israel on the College of Law faculty listserv in February 2024, when he circulated an abstract of a paper on ending Israel that he later gave at a College of Law faculty research seminar. Exhibit A at ¶ 39. He thereafter continued to occasionally discuss his views on that listserv. *See e.g. Id.* at ¶ 40; Exhibit D at ¶¶ 2-4.

The University also alleges that Professor Woodcock is "using the University's resources to circulate an online petition, Petition for Military Action Against Israel." Exhibit A Ex. 19. On July 6, 2025, Professor Woodcock shared links to the website of the Antizionist Legal Studies Movement (antizionist.net) in four AALS online discussion groups and participated in a collegial fashion in subsequent debates about Israel in those groups. Exhibit A at ¶¶ 41, 55; Exhibit A Ex. 29. Professor Woodcock first shared a statement opposing the existence of Israel and supporting military action with the faculty listserv in March 2024. Exhibit A at ¶ 40. He shared another petition with the title referenced in the allegation on the faculty listserv in July 2025. Exhibit A at ¶ 40. Professor Woodcock is not the only faculty member to have shared political material and material not directly related to University business on the faculty listserv. Exhibit D ¶¶ 2, 6; Exhibit F at ¶¶ 6-8; Exhibit A ¶ 16;

Exhibit A Ex. 2. Other than Professor Woodcock, there are no apparent instances of faculty being investigated or disciplined for sending political messages to the listserv. Exhibit F at ¶ 7.

On September 8, after seven weeks of digging, the University's investigator issued a second Notice of Investigation informing Professor Woodcock of four new allegations based on reports that the investigator had apparently solicited from students. Exhibit C at ¶ 5; Exhibit C Ex. 3. In the first two allegations, The University claims Professor Woodcock is "using his official position as a University of Kentucky professor to call for violence against Israel, the genocide of Israeli people who are predominantly Jewish, and the ultimate destruction of Israel." *Id.* The University also alleges that he is making these statements "in a manner that uses anti-Semitic tropes." *Id.* The University has refused to identify the speech that it alleges calls for genocide or employs anti-Semitic tropes and has not provided a definition of "anti-Semitic trope". Exhibit B at ¶ 5; Exhibit B Ex. 3; Exhibit B Ex. 5. Professor Woodcock does not call for genocide. Exhibit A at ¶ 13; Exhibit E at ¶ 4; Exhibit F at ¶ 14; Exhibit H at ¶ 8. He calls for an end to Israel, which he considers to be a Western colonization project. Exhibit A at ¶ 14. He points out that dozens of Western colonies were brought to an end in the 20th century and none of those instances of decolonization resulted in a genocide of the colonizer population. *Id.*

The University also alleged that Professor Woodcock made "anti-Semitic and anti-Israeli remarks during an optional lecture [including] that Professor Woodcock does not need to invite or include any speakers or guest lecturers with a pro-Israeli viewpoint because such speakers are pro-genocide." Exhibit C at ¶ 5; Exhibit C Ex. 3. The allegation appears to refer to a November 13, 2024 College of Law community discussion forum about free speech on campus. Exhibit A at ¶ 19; Exhibit A Ex. 5. According to a recording of the event, Professor Woodcock posed the following question to the speaker leading the discussion: "I asked the University if I could bring someone to campus to talk about genocide and the response was 'Yep, you can do that. But if you bring in somebody who's like

anti-genocide, you have to bring in someone who's pro-genocide.' What's your view as a . . . First Amendment scholar?" *Id.*

Finally, the University accuses Professor Woodcock of "shouting 'Free Palestine,' while driving a car with University of Kentucky law students[.]" Exhibit C at ¶ 5; Exhibit C Ex. 3. Professor Woodcock called out "Free Palestine" to two men in a crosswalk in downtown Cincinnati who were wearing Palestinian garb while driving students who had won a public interest auction to spend time with him in private life. Exhibit A at ¶ 11. None of the students complained to the University about this remark, and one of them has since described his reaction as follows: "I remember thinking it was pretty cool that a professor would stand up for what he believes in and rally with causes that are important." Exhibit I at ¶ 6.

STANDARD FOR RELIEF

The purpose of preliminary injunctive relief is to preserve the existing state of things until the rights of the parties can be fairly and fully investigated and determined. *Performance Unlimited, Inc. v. Questar Publishers, Inc.*, 52 F.3d 1373, 1378 (6th Cir. 1995) (internal citations omitted). The decision about whether injunctive relief is warranted depends on four factors: whether (1) "the plaintiff has established a substantial likelihood or probability of success on the merits," (2) "the plaintiff would suffer irreparable injury if a preliminary injunction did not issue," (3) "the injunction would cause substantial harm to others," and (4) "the public interest would be served if the court were to grant the requested injunction." *Liberty Coins, LLC v. Goodman*, 748 F.3d 682, 690 (6th Cir. 2014) (internal citations omitted) (cleaned up). "These four factors are not prerequisites that must be met, but interrelated considerations that must be balanced." *Preterm-Cleveland v. McCloud*, 994 F.3d 512, 519 (6th Cir. 2021) (en banc) (internal citation omitted).

Professor Woodcock satisfies these factors for the reasons identified below.

ARGUMENT

I. Plaintiff is Likely to Succeed on the Merits.

To prevail on a claim under 42 U.S.C. § 1983, Plaintiff must establish "that (1) a person, (2) acting under color of state law, (3) deprived the plaintiff of a federal right." *Sperle v. Michigan Dept. of Corr.*, 297 F.3d 483, 490 (6th Cir. 2002). Here, Defendants claim to act under the authority of University policies as well as Kentucky Senate Joint Resolution 55, which mandates that public universities in Kentucky use the IHRA definition of antisemitism. Under color of these state rules, Defendants are depriving Professor Woodcock of his First Amendment and Due Process rights, as described below.

A. The Suspension, Banishment, and Investigation of Professor Woodcock are Obvious First Amendment Violations.

Defendants retaliated against Plaintiff because of his First Amendment protected activity.

1. The Protection of Political and Academic Speech Are Fundamental First Amendment Concerns.

Protection of political speech is the central purpose of the First Amendment's speech clause. *New York Times Co. v. Sullivan*, 376 U.S. 254, 270 (1964). The Constitution protects "free political discussion" as "a fundamental principle of our constitutional system." *Id.* at 269; *Rudd v. City of Norton Shores, Michigan*, 977 F.3d 503, 514 (6th Cir. 2020) ("Criticism of government is at the very center of the constitutionally protected area of free discussion.'") (internal citation omitted). Moreover, the courts treat speech by university professors as fundamental to the realization of all other rights—because professors teach us the critical thinking skills we use to assert and defend our rights and because of the central role universities play in public discourse. *Grutter v. Bollinger*, 539 U.S. 306, 329 (2003); *Keyishian v. Bd. of Regents,* 385 U.S. 589, 603 (1967); *Sweezy v. State of N.H. by Wyman*, 354 U.S. 234, 250 (1957). The right of professors to speak therefore holds a "special niche" in our constitutional tradition. *Grutter*, 539 U.S. at 329.

Accordingly, the First Amendment protects a public university professor's speech on matters of public concern even when he is presenting to a captive student audience, allowing the government to

prohibit it "only when [the University's] interest in restricting a professor's in-class speech outweighs his interest in speaking." *Meriwether v. Hartop*, 992 F.3d 492, 506 (6th Cir. 2021). Moreover, a university professor's interest in presenting his views to other professors, the public, and students will always outweigh the government's interest in punishing those views it happens to fear or dislike. *See Id.* at 507 ("public universities do not have a license to act as classroom thought police"). The *Garcetti* exception, which removes First Amendment protection from public employees' speech made pursuant to their official duties, does not apply to academic speech. *Id.* at 505; *Garcetti v.* Ceballos, 547 U.S. 410, 421 (2006). In Professor Woodcock's case, which does not involve a captive student audience but rather speech by Professor Woodcock directed primarily at other scholars in online or in-person conferences or discussion fora, the interest in protecting speech is stronger still.

When a faculty member speaks as a teacher, scholar, or private citizen about "a matter of public concern," the Government's interest in restricting that speech must clear the high bar set by the *Pickering* balancing test. *Pickering v. Bd. of Ed. of Twp. High Sch. Dist. 205,* 391 U.S. 563, 568 (1968). The University must show that Plaintiff's interest in disseminating his views as an academic or private citizen is less important than the University's interest in "promoting the efficiency of the public services [the University] performs through" Professor Woodcock by suppressing and punishing his speech. *Id.*; *Meriwether*, 992 F. 3d at 507-08; *Noble v. Cincinnati & Hamilton Cty. Pub. Library*, 112 F. 4th 373, 381 (6th Cir. 2024.) A faculty member may speak both as a university employee carrying out duties of teaching and scholarship and as a private citizen at the same time. *Vaughn v. Lawrenceburg Power System*, 269 F. 3d 703, 716 (6th Cir. 2001); *Bonnell v. Lorenzo*, 241 F. 3d 800, 812 (6th Cir. 2001). Either way, the speech is protected so long as it passes the *Pickering* balancing test. *Meriwether*, 992 F. 3d at 504-06; *Noble*, 112 F. 4th at 380-81.

Speech by a faculty member is also protected when he speaks in a limited public forum established by the university, such as a faculty listserv or university-sponsored discussion forum devoted to a

particular topic, and the *Pickering* balancing test does not apply to such speech. *Kincaid v. Gibson*, 236 F. 3d 342, 348 (6th Cir. 2001). A limited public forum is a forum "for use . . . by certain speakers, or for the discussion of certain subjects." *Cornelius v. NAACP Legal Defense and Educ. Fund, Inc.*, 473 U.S. 788, 802 (1985). In deciding whether a government agency has created a limited public forum, the courts consider the agency's policies, actual practices, the compatibility of the forum with expressive activities, and the context, such as whether the forum was created by a university. *Kincaid*, 236 F. 3d at 351. For example, when a university opens a forum to student yearbook editors, it creates a public forum limited to those editors and the subjects usually covered by yearbooks. *Id.* at 353-54. Once a public university has opened a limited public forum, viewpoint discrimination is prohibited and strict scrutiny applies to attempts to narrow permissible content beyond the limits that define the forum. *Id.* at 354; *Gilles v. Garland*, 281 F. App'x 501, 509 (6th Cir. 2008).

2. Plaintiff's Speech Is Academic Speech or Speech as a Private Citizen on a Matter of Public Concern.

Defendants are investigating eight allegations against Professor Woodcock and claim that each of them justifies his ongoing punishment. Exhibit A Ex. 19; Exhibit C Ex. 3; Exhibit B Ex. 7. All eight relate to one topic: Israel. To determine whether speech involves a matter of public concern, courts must look at the "content, form, and context of a given statement, as revealed by the whole record." *Connick v. Myers,* 461 U.S. 138, 145, 147-48 (1982). Whether speech involves a matter of public concern is a question of law for the court, barring a factual dispute about what specific words were used. *Farhat v. Jopke*, 370 F.3d 580, 589 (6th Cir. 2004).

Palestine and Israel are central to political discourse in Kentucky and the nation. *Connick*, 461 U.S. at 138 (speech relating to "any matter of political, social, or other concern to the community" addresses a matter of public concern). The importance of this topic to the public discourse is reflected in the politics of the state: the Kentucky General Assembly has a 56-member Israel Caucus and Kentucky Congressman Thomas Massie has made his opposition to pro-Israel lobby AIPAC a

centerpiece of his election campaign. While Defendants attempt to characterize Professor Woodcock's speech as calling for "the genocide of Israeli people" and using "anti-Semitic tropes," Professor Woodcock's reasoned conclusion that Israel is a Western colony does neither. That conclusion is reached step-by-step via historical comparisons and legal analysis. Exhibit A at ¶¶ 13, 14, 43.

In any case, the First Amendment's protections do not depend on a person's choice of words and apply even to "unpleasantly sharp attacks." *NY Times*, 376 U.S. at 271. The fact that Plaintiff's messages may be "offensive to some of their hearers" does not mean Defendants can censor them or consider them to be not related to a public matter. *Matal v. Tam*, 582 U.S. 218, 243–44 (2017). Nothing about Plaintiff's speech puts it within the "vanishingly small category of speech that can be prohibited because of its feared consequences." *Morse v. Frederick*, 551 U.S. 393, 438 (2007); *see also Noto v. United States*, 367 U.S. 290, 297–98 (1961) (stating that a university cannot ban speech simply because it includes "the teaching of the moral propriety or even moral necessity for a resort to force and violence."); *Bible Believers v. Wayne Cty., Mich.*, 805 F.3d 228, 246 (6th Cir. 2015) (en banc) (protecting speech unless "the imminent use of violence or lawless action is the likely result[.]").

The context of the speech also reinforces Plaintiff's contention that his speech related to matters of public concern. Professor Woodcock made the statements that the University has challenged either in public or in front of an audience, reflecting the statements' public orientation. He made the statements at conferences, in online discussion forums with hundreds of law professor members from across the country, on a faculty listserv with dozens of members, at a campus event on free speech that was open to the University community, and to people on the street in downtown Cincinnati.

Professor Woodcock's statements at conferences in Washington, DC and Hong Kong are academic speech because he made them from the podium during his scheduled presentation slot, they reported results of his research on Israel and decolonization, and he considered them to be an essential part of his scheduled presentation. While Defendants may argue that Professor Woodcock's

statements about Israel were unrelated to the topics of the conference sessions at which he delivered them and therefore were not protected academic speech, the Sixth Circuit has rejected that approach even when the speech at issue is inside a classroom of students who are required to be there. *Meriwether*, 992 F. 3d at 507 ("[A]cademic[ ]freedom . . . covers all classroom speech related to matters of public concern, whether that speech is germane to the contents of the lecture or not."). Moreover, witnesses attest that, in the academic conference environment it is common for faculty to speak about topics that are not strictly relevant to the topic of the conference in the narrow sense or relevant to University business. Exhibit F at ¶¶ 7, 10-11; Exhibit E at ¶. 3; Donovan Dec. at ¶ 2. Such topic-bending speech is an integral part of academic speech at conferences because it enables scholars to discover new connections between ideas. Just as Professor Woodcock's speech as a presenter at academic conferences regarded a matter of public concern, so too did his academic question as an audience member at a campus discussion forum that no person was obligated to attend. To the extent that Professor Woodcock's statements and question were not exclusively academic speech, they were speech as a private citizen on a matter of public concern.

Likewise, Professor Woodcock's communications on two listservs—one maintained by a third party and the other by the University—also qualify as academic speech or speech as a private citizen on a matter of public concern. When Professor Woodcock emailed his professor colleagues links to a website he made, he did so for a scholarly purpose: in order to build a scholarly movement around his research conclusions regarding Israel. Exhibit A at ¶ 38. In doing so, Professor Woodcock triggered debate in these forums, and law professors on both sides of the debate joined. Professor Woodcock's contributions to the discussions were scholarly in character and included discussions of the history of Palestine, decolonization in the 20th century, and the international norm against colonization—all matters of public concern.

Professor Woodcock's statement in a street in downtown Cincinnati was about a matter of public concern Professor Woodcock called out "Free Palestine" to two men wearing Palestinian garb in a crosswalk. *Id.* The students who overheard this comment had won a bid to spend time with Professor Woodcock off-campus for what he had described as "Professor Woodcock's Day Off". Exhibit A at ¶ 11. As the billing of the event suggests, Professor Woodcock spoke as a private citizen. *See Kennedy v. Bremerton School District*, 597 U.S. 507, 530 (2022) (holding that a public football coach's voluntary group prayers after games was private speech, even though it was on school grounds with minor-aged students). To the extent that Professor Woodcock did not speak exclusively as a private citizen, he spoke as a teacher or scholar.

All of the speech at issue here was academic speech or speech as a private citizen on a matter of public concern, and is thus protected speech.

3. Plaintiff's Interest in Speaking Outweighs the Government's Illegitimate Interest in Suppressing a Viewpoint it Does Not Like.

As in *Meriwether v. Hartop*, in which the Sixth Circuit reaffirmed that free speech by university professors on controversial political issues is a core First Amendment concern, Professor Woodcock's speech implicates the heartland of a fundamental right—academic freedom—as well as his right to criticize his own and other governments. 992 F. 3d at 504–06. Protection for Plaintiff's speech is consistent with the "profound national commitment," memorialized in the First Amendment, "that debate on public issues be uninhibited, robust, and wide-open, and that it may well include . . . sharp attacks on government." *New York Times v. Sullivan*, 376 U.S. 254, 270–71 (1964).

The interest in protecting Professor Woodcock's speech is especially strong because pro-Palestine speech has been chilled for decades on American university campuses to such an extent that scholars

speak of a "Palestine exception" to free speech.[1] Since at least the early 1980s, pro-Israel organizations have used monitoring and surveillance, blacklists, false accusations of antisemitism or terrorism, lawsuits, promotion of unconstitutional legislation or administrative actions, and other tactics to create a climate of fear on American campuses regarding pro-Palestine speech.[2] Organizations such as these called for passage of the Kentucky statute endorsing the IHRA definition of antisemitism, testified falsely about Professor Woodcock at a hearing on the bill, and celebrated the University's decision to suspend, banish, and investigate Professor Woodcock.

This suppression has reached a fever pitch over the past two years, with politicians in Congress demanding the termination of University professors and the U.S. Secretary of State accusing peaceful student protestors of terrorism and seeking to deport them. *See American Association of University Professors, et. al. v. Rubio,* No. 1:25-cv-10685-WGY, 2025 WL 2777659 (D. Mass. Sept. 30, 2025) (finding that the federal government's campus enforcement activities have had the "the goal of tamping down pro-Palestinian student protests and terrorizing similarly situated non-citizen (and other) pro-Palestinians into silence because their views were unwelcome.").

The University has no legally cognizable interest in restricting Professor Woodcock's speech. Over the course of the eighteen months between Professor Woodcock's initial public statement of his views and the commencement of the suspension, banishment, and investigation, the effect of Professor Woodcock's speech on the efficient operation of the University was nil. The only adverse response received by the University appears to have been complaints by four professors at other schools who

---

[1] *See, e.g.*, Mohammad Fadel, *The Palestine Exception to Academic Freedom Must Go*, The Chron. of Higher Educ. (Apr. 24, 2024), https://www.chronicle.com/article/the-palestine-exception-to-academic-freedom-must-go.

[2] *See* Deeb, Lara & Jessica Winegar, *Anthropology's Politics: Disciplining the Middle East*, pp. 104–05 (Stanford Univ. Press 2015) (stating that as early as 1983, the pro-Israel Anti-Defamation League produced a blacklist of pro-Palestine scholars and monitored their activities).

had attended conferences with Professor Woodcock in Washington, DC and Hong Kong or participated in AALS online discussion groups with him and disagreed with his views. (There do not appear to have been any complaints about Professor Woodcock's speech at the campus event on free speech or in downtown Cincinnati.)

Since then, the only disruption experienced by the University in relation to Professor Woodcock has been caused by the University's attempt to retaliate against him. The College of Law has only a dozen tenured faculty and is severely understaffed. Exhibit J at ¶ 8. As a result of the suspension, the University canceled Professor Woodcock's fall 2025 antitrust law class, for which students had already enrolled, and assigned an adjunct professor with no teaching experience in the field to teach his Secured Transactions class. Exhibit E at ¶ 9; Exhibit J at ¶ 8. The University has assigned Professor Woodcock's spring 2026 contract law course to a professor who has not taught the subject in years, if ever, and will not offer the international law seminar normally taught by Professor Woodcock in spring 2026. Exhibit A at ¶¶ 34, 44. The University's retaliation against Professor Woodcock has created a climate of fear on campus that has caused faculty and students to self-censor and contemplate separation from the University. Florentino Decl. at ¶¶ 4-5, 8; Exhibit J at ¶ 7. The university has spent hundreds of thousands of dollars that might have been allocated to hiring more law faculty to hire a Washington, DC law firm to conduct an unnecessary investigation. Exhibit A at ¶ 54; Exhibit A Ex. 28.

The University claims that it has an interest in protecting Jewish members of the community from a hostile environment, but the University's allegations do not suggest that Professor Woodcock's speech created such an environment or that the University had a duty to act. Title VI requires only that a University not be "deliberately indifferent" when it has "actual knowledge" of "severe, pervasive, and objectively offensive" harassment that causes members of a protected class "to be deprived of educational opportunities or benefits." *Gebser v. Lago Vista Independent School Dist.*, 524 U.S.

274, 290 (1998); *Doe v. Miami University*, 882 F. 3d 579, 590-91 (6th Cir. 2017). The behavior must be "serious enough to have [a] systemic effect." *Meriwether*, 992 F. 3d at 511. The University has not, however, alleged a single instance of harassing conduct by Professor Woodcock directed at a Jewish member of the University community, much less the pattern of harassment required to violate Title VI. Indeed, the University has not even alleged a single statement by Professor Woodcock that would tend to show that his speech is the product of racial animus or discriminatory intent rather than principled opposition to colonization, apartheid, and genocide and an assessment of possible solutions in light of historical precedent. *Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252, 265 (1976) (requiring proof of discriminatory intent in federal funding cases). Rather, these actions resulted from President Capitoulo's publicly announced opinion that Professor Woodcock's speech is "repugnant" as well as from the University's adoption of a definition of antisemitism that bans broad categories of protected speech critical of Israel. Exhibit A ¶¶ 32, 33; Exhibit A Ex. 18; Woodcock Dec. Ex. 19 (referencing the International Holocaust Remembrance Alliance's definition of anti-Semitism). The unconstitutionality of the IHRA definition of antisemitism is addressed in detail in Section I.B below.

A recent First Circuit case involving a Title VI challenge to pro-Palestine speech at MIT is instructive. *Stand With Us v. MIT*, No. 24-1800 slip op. (1st Cir. Oct. 21, 2025). In that case, student protesters: denounced Israeli apartheid, occupation, and military rule; affirmed the right of all occupied people to resist oppression and colonization; called for the liberation of Palestine "from the river to the sea"; and called for "Intifada revolution." *Id.* at 3-4. Plaintiffs in that case claimed that these were calls to wipe out the Jewish people. *Id.* at 34. The court ruled that antizionism is not inherently antisemitic and that the protesters' statements did not suggest that they "supported the Palestinian cause because of antisemitic animus." *Id.* at 32. The court rejected the suggestion in the IHRA definition of antisemitism that speech comparing Israel to the Nazis, denying a Jewish right of self-

determination, or singling Israel out for criticism implies racial animus. *Id.* at 28-29; *see also Segev v. President and Fellows of Harvard College et al.*, No. 1:25-cv-12020, electronic order (D. Mass. Dec. 5, 2025) ("Segev cannot transform his assailants' anti-Israel sentiment into antisemitism.").

Defendants suggest that Professor Woodcock had a duty to state that he was speaking on his own behalf and not on behalf of the University when discussing Israel at conferences and in online discussion groups. But the professors who were his audience in these fora know that scholars are not university spokesmen. Exhibit D at ¶ 5; Exhibit E at ¶ 2; Bird-Pollan at ¶ 10. Moreover, Professor Woodcock has never issued such a disclaimer at any conference or in any law faculty online discussion group when commenting on any matter of public concern, not just Palestine. Exhibit A ¶ 10. The University's assertion of such a duty only once Professor Woodcock started speaking about Palestine is pretextual. Exhibit A ¶ 10. Any University policy that may require faculty to jump through a verbal hoop that lacks a regulatory justification, such as by stating that he speaks on his own behalf in front of audiences for which that is already the default expectation, in order to avoid sanction for speech as a scholar or private citizen on a matter of public concern, violates the First Amendment. *See Turner Broadcasting System, Inc. v. FCC*, 512 U.S. 622, 641 (1994) (stating that when government compels speech it "pose[s] the inherent risk that the Government seeks . . . to suppress unpopular ideas[.]"); *Keyishian*, 385 U.S. at 592-93 (rejecting requirement that a professor make factual statement regarding political affiliation as a condition for university employment); *Parate v. Isibor*, 868 F. 2d 821, 828 (6th Cir. 1988) (collecting compelled speech cases).

In one pan of the *Pickering* balance scale sits an interest in free expression that is at its zenith in the context of a university professor's academic speech or speech as a private citizen. The other pan is empty. It contains neither an interest in mitigating a hostile environment, for there is no allegation that one exists, nor an interest in preserving the university against community or political disapproval, as those are not legitimate First Amendment concerns. President Capilouto's personal antipathy

toward Professor Woodcock's views also carries no weight. The *Pickering* scale tilts decisively in favor of First Amendment protection for Professor Woodcock's speech.

Professor Woodcock's speech on the faculty listserv and at the College of Law discussion forum on free speech receives a second layer of protection because both the listserv and the free speech event were limited public fora. College of Law faculty have long used the faculty listserv to share research and comment on matters of public concern without limit as to content. Professor Woodcock's question at the free speech event fit the topic of the event because he asked about an attempt of the University to regulate speech. *Kincaid*, 236 F. 3d at 349-52.

4. Defendants Took Adverse Actions Against Plaintiff Because of His Protected Speech

Defendants' letters explicitly state that they took action against Plaintiff because of his speech. An adverse action in the First Amendment context is an action "that would chill a person of ordinary firmness from continuing the activity." *Ryan v. Blackwell,* 979 F.3d 519 (6th Cir. 2020). Removal of employment rights is routinely considered materially adverse for First Amendment purposes. *Ryan v. Blackwell,* 979 F.3d 519 (6th Cir. 2020); *Rutan v. Republican Party of Illinois*, 497 U.S. 62, 75 (1990). Suspensions, campus building bans, and investigations each individually qualify as adverse actions. *See e.g. Michael v. Caterpillar Fin. Servs. Corp.*, 496 F.3d 584, 596 (6th Cir. 2007); *McNeally v. HomeTown Bank,* 155 F.4th 1000, 1007 (8th Cir. 2025). *Howard v. Livingston Cnty., Michigan*, No. 21-1689, 2023 WL 334894, at *9 (6th Cir. Jan. 20, 2023).

B. The University's Use of the IHRA Definition of Antisemitism Is Unlawful Viewpoint Discrimination.

The "most basic" principle of the First Amendment is that the Government cannot restrict speech "because of its message, its ideas, its subject matter, or its content." *Brown v. Ent. Merchants Ass'n*, 564 U.S. 786, 790–91 (2011). That is why the First Amendment's prohibition on viewpoint-based discrimination "is a constant." *Child Evangelism Fellowship of S.C. v. Anderson Sch. Dist. Five*, 470 F.3d 1062, 1067 (4th Cir. 2006). It is why content-based discrimination is "presumptively invalid." *R.A.V.*

v. St. Paul, 505 U.S. 377, 382 (1992). Here, viewpoint discrimination dooms the University's suspension, banishment, and investigation of Professor Woodcock.

When the University publicly announced its suspension, banishment, and investigation of Professor Woodcock, it explicitly relied on the IHRA definition of antisemitism and the Department of Education's guidance on that definition to punish Plaintiff. Woodcock Dec. Ex. 19 at p. 1 (referencing the IHRA definition of anti-Semitism); Exhibit B Ex. 2 (stating that the investigation "will use the definition of antisemitism adopted by its Board of Trustees, mandated by the Kentucky General Assembly, and used by the federal government.").

Federal courts have repeatedly found that the IHRA definition violates the Free Speech Clause. The IHRA definition's Contemporary Examples of Anti-Semitism goes beyond identifying examples of anti-Jewish animus and contains several provisions that mischaracterize critique of Israel, Zionism, and religious nationalism as antisemitic. The examples treat as antisemitic speech that is critical of Israel, including "comparisons of contemporary Israeli policy to that of the Nazis," the assertion that "the existence of a State of Israel is a racist endeavor," and "applying double standards" to Israel.[3] These examples relate to Israel rather than Jewish people. The examples also prohibit "[d]enying the Jewish people their right to self-determination." Any opponent of the creation of political rights based on religious affiliation, regardless of the religion in question, would violate that prohibition. The University's use of the overbroad IHRA definition to label Professor Woodcock's speech antisemitic and sanctionable is impermissible viewpoint discrimination.

Title VI cannot constitutionally prohibit criticism of Israel. It would be "presumptively unconstitutional" for the Department of Education to "use the power of the State to punish or suppress disfavored expression." *Nat'l Rifle Ass'n of Am. v. Vullo*, 602 U.S. 175, 188 (2024).

---

[3] International Holocaust Remembrance Alliance (IHRA), *Working definition of antisemitism*, https://holocaustremembrance.com/resources/working-definition-antisemitism.

Defendant Thro has himself acknowledged this. He once wrote that a "public institution's first obligation is to the Constitution, not Title IX [the sex discrimination analogue of Title VI] or the collegial epistles of the Assistant Secretary of Education for Civil Rights."[4]

The Department of Education's adoption of the IHRA policy exceeds the authority granted to the agency by Title VI, both because the policy adds protected classes that are not in the statute and because the policy violates the freedom of expression guaranteed by the First Amendment. Departments enforcing the civil rights statutes are not authorized to add additional protected classes to the statutes. When reviewing a Department of Education rule interpreting sex-based harassment under Title IX as including gender identity, this court observed that "there is *nothing* in the text or statutory design of Title IX to suggest that discrimination 'on the basis of sex' means anything other than it has since Title IX's inception—that recipients of federal funds under Title IX may not treat a person worse than another similarly-situated individual on the basis of the person's sex, i.e., male or female." *Tennessee v. Cardona*, 762 F. Supp. 3d 615, 622 (E.D. Ky. 2025), *as amended* (Jan. 10, 2025) (Reeves, J.). Accordingly, the Court ruled that the Department of Education exceeded its authority in adding gender identity as a protected class. *Id.*

Likewise, Title VI, by its plain language, prohibits discrimination against individuals "on the ground of race, color, or national origin," not discrimination against political ideologies such as Zionism, or state projects such as the State of Israel, on the ground that they support colonization, apartheid, and genocide. 42 U.S.C. § 2000d. It also does not prohibit discrimination against certain ideas, such as the idea that any particular religious group has a right to self-determination as such, on the ground that some other neutral principle should instead determine political rights, such as presence in the territory or indigeneity. It would be very strange if it did, as America was founded on

[4] William E. Thro, *No Clash of Constitutional Values: Respecting Freedom and Equality in Public University Sexual Assault Cases*, 28 REGENT U. L. REV. 197, 201 (2016).

the premise that political rights should not be doled out based on religious affiliation. *Cath. Charities Bureau, Inc. v. Wis. Lab. & Indus. Rev. Comm'n*, 145 S. Ct. 1583, 1591 (2024). Political ideologies, foreign state projects, and ideas about whether religious groups have rights of self-determination are simply not the stated beneficiaries of the statute.

Applying these principles to the IHRA definition, federal courts throughout the country have held that restrictions on anti-Israel speech violate the First Amendment and are not valid anti-discrimination measures. *See Univ. of Houston, Students for Justice in Palestine v. Abbott*, 756 F.Supp.3d 410. 425 (W.D. Tex. 2024) ("[T]he Court finds the incorporation of this specific definition of antisemitism is viewpoint discrimination" because it "labels calling the State of Israel a racist endeavor and drawing comparisons of contemporary Israeli policy to that of the Nazis as antisemitic"); *American Association of University Professors, et. al. v. Rubio*, No. 1:25-cv-10685-WGY, 2025 WL 2777659 (D. Mass. Sept. 30, 2025) ("AAUP") (finding viewpoint discrimination because the Government was using "a definition of antisemitism that includes protected speech such as comparing Israel's policies to those of the Nazis"). *See also Gartenberg v. Cooper Union for the Advancement of Sci. & Art*, No. 2025 U.S. Dist. LEXIS 33977 at *8-*9 (S.D.N.Y. Feb. 25, 2025); *Jordahl v. Brnovich*, 336 F. Supp. 3d 1016, 1049 (D. Ariz. 2018), vacated as moot 789 Fed. Appx. 589 (9th Cir. 2020; *Amawi v. Pflugerville Indep. Sch. Dist.*, 373 F. Supp. 3d 717, 750-51 (W.D. Tex. 2019), vacated as moot, 956 F.3d 816 (5th Cir. 2020); *Koontz v. Watson*, 283 F. Supp. 3d 1007, 1022 (D. Kan. 2018) ("This is either viewpoint discrimination against the opinion that Israel mistreats Palestinians or subject matter discrimination on the topic of Israel. Both are impermissible goals under the First Amendment").

The weight of federal authority is clear; the University may not impose on its faculty a definition of antisemitism that precludes critique of Israel or Zionism as racist or genocidal colonization projects, or that calls into question a right of self-determination based on religious affiliation on the ground the self-determination should be based on indigeneity, presence, or some other neutral principle.

C. The Absence of Any Pre-Deprivation Process Makes the Due Process Violation Glaring

The Fourteenth Amendment prohibits governmental actions that deprive "any person of life, liberty, or property, without due process of law." U.S. Const. amend. XIV, § 1. A procedural due process claim arises when (1) the plaintiff has a liberty or property interest protected by the Due Process Clause of the Fourteenth Amendment, (2) the plaintiff is deprived of this protected interest, and (3) the state did not afford the plaintiff adequate procedural rights prior to depriving him of his protected interest. *Hahn v. Star Bank*, 190 F.3d 708, 716 (6th Cir. 1999).

Professor Woodcock has a written contract establishing his appointment with tenure to the College of Law. Exhibit A at ¶¶ 17-18; Exhibit A Exs. 3, 4. It is well-established that tenured faculty have property interests in their positions. *Perry v. Sindermann,* 408 U.S. 593, 601 (1972) ("A written contract with an explicit tenure provision clearly is evidence of a formal understanding that supports a teacher's claim of entitlement to continued employment unless sufficient 'cause' is shown."). Plaintiff's property interest in his tenured position consists of not only the title but the position itself, determined by the "terms and conditions" of the appointment and the "unanimous custom and practice of the university." *Hulen v. Yates*, 322 F.3d 1229, 1241–44 (10th Cir. 2003) (holding that reassignment of a professor to a different department implicated a property interest). Along the same lines, A prolonged suspension from a position in which one has a protected property interest is a "deprivation" for due process purposes. *Fed. Deposit Ins. Corp. v. Mallen*, 486 U.S. 230, 240–42 (1988). Courts have found deprivations of property interests in situations where faculty suffered a reduced teaching load, removal of prestigious status and advising privileges for three years, an "unwanted job transfer," or preclusion from service on university committees. *Gunasekera v. Irwin*, 551 F.3d 461, 468 (6th Cir. 2009) (collecting cases). *See also Kennedy v. City Of Cincinnati*, 595 F.3d 327, 336 (6th Cir. 2010) (banishing an individual from government buildings they would normally have a right to access is a deprivation of a liberty interest).

Plaintiff was summarily suspended from his job and banned from the College of Law. Exhibit B at ¶ 7; Exhibit B Ex. 4. The scope of Professor Woodcock's interest in his job extends to the terms and conditions of his appointment, including to carry out teaching, research, and service responsibilities in the law school building. Exhibit F at ¶ 5; Exhibit F Ex. 2.

The fact that University Defendants labeled the suspension a "reassignment" does not lessen the effect, since the reassignment precludes Plaintiff from performing two of the main aspects of his job—teaching (which includes advising) and service—and limits his ability to perform the third—research—by, for example, denying him physical access to the law library. *Id.*

Prior to suspending Professor Woodcock, Defendants provided no process at all. In doing so, the University skipped over the "root requirement" of the Due Process Clause, which is "an opportunity for a hearing before [an individual] is deprived of any significant property interest." *Hieber v. Oakland Cnty., Michigan*, 136 F.4th 308, 321 (6th Cir. 2025) (emphasis in original) (internal citations omitted). Due process after the employment decision has already taken effect is not as effective or "meaningful" as pre-deprivation process. *Loudermill*, 470 U.S. at 543; *Carmody v. Bd. of Trs. of Univ. of Illinois*, 747 F.3d 470, 475 (7th Cir. 2014); *see also Gunasekera v. Irwin*, 551 F.3d 461, 464, 471 (6th Cir. 2009) (finding a due process violation where no pre-deprivation hearing took place prior to suspension of a faculty member's Graduate Faculty status and prohibition from advising graduate students).

Pre-deprivation due process can therefore only be circumvented in "extraordinary situations" where a pre-deprivation process is not feasible because there is a "special need for very prompt action," such as a public health and safety emergency, the need to prevent the removal from the jurisdiction of a vessel being used for drug trafficking, or the filing of formal felony charges against a police officer. *United States v. James Daniel Good Real Prop.*, 510 U.S. 43, 53 (1993); *See also Zinermon v. Burch*, 494 U.S. 113, 132 (1990); *Ewing v. Mytinger & Casselberry*, 339 U.S. 594, 600–01(1950); *Calero-Toledo v. Pearson Yacht Leasing Co.*, 416 U.S. 663, 678 (1974); *Gilbert v. Homar*, 520 U.S. 924, 934 (1997).

In this case, Defendants will not provide even post-deprivation process. The University's investigation affords Professor Woodcock no opportunity to challenge the decision to suspend or banish him pending the investigation or the decision to launch the investigation. Exhibit B Ex. 2 ("The Dean has absolute authority to determine the assignments of a faculty member."). It affords him only a limited opportunity to defend against the University's attempt to impose a permanent sanction on him, such as termination. Exhibit C Ex. 2 at p. 3.

II. The Other Preliminary Injunction Factors Also Favor Professor Woodcock

A plaintiff's harm is irreparable if it is not fully compensable by monetary damages. *Obama for Am. v. Husted*, 697 F.3d 423, 436 (6th Cir. 2012). When constitutional rights are threatened or impaired, irreparable injury is present. *ACLU of Ky. v. McCreary County, Ky.*, 354 F.3d 438, 445 (6th Cir. 2003). Just as the deprivation of a constitutional right proves irreparable harm, the public interest is always in preventing the violation of a party's constitutional rights. *Liberty Coins, LLC v. Goodman*, 748 F.3d 682, 690 (6th Cir. 2014).

Furthermore, the balance of equities tips decisively in Plaintiff's favor. There would be no risk of harm to others, including the Defendants, associated with allowing Professor Woodcock to return to work and continue teaching students in the exemplary manner in which he always has. *Gen. Drivers, Warehousemen & Helpers v. The Kenton Cnty. Airport Bd.*, 2024 WL 3681417, at *9. Students are now deprived of a professor who was willing to conduct 15-hour review sessions for his Contracts II class. Exhibit I at ¶ 7; Bolter Dec. at ¶ 2; Exhibit L at ¶¶ 2-3. As Professor Michael put it, "students have been deprived of a good professor for no reason at all. One of his most important classes had to be canceled." Exhibit E at ¶ 9.

Furthermore, Defendants would not be prevented from initiating an investigation into any legitimate claim that Professor Woodcock is not performing his duties and responsibilities as a law school professor if factual developments were to warrant one. Finally, ending the investigation would

benefit the entire University, not to mention the public generally, in that it would prevent any further chilling of constitutionally protected speech among the University's students and faculty. Faculty and students currently report fear of speaking about controversial matters, uncertainty about whether such speech is permitted, and disruption of the College of Law. Exhibit K at ¶¶ 7-8; Exhibit G at ¶ 7; Exhibit I at ¶ 8; Exhibit F at ¶ 9; Exhibit E at ¶ 7; Donoval Decl. at pp. 7-8 ("There are fewer political conversations now. Faculty can see what happens when someone says something that does not fit the political agenda of the people controlling the University."); Exhibit D Ex. 1 ("After all, no member of the university community is immune from what has transpired in Ramsi's case, and if these questions are not satisfactorily answered, some, perhaps all, may wish to start seeking employment elsewhere.").

Conclusion

WHEREFORE, Plaintiff respectfully requests entry of an order enjoining the University, during the pendency of this matter, from continuing the investigation into his protected speech and maintaining his reassignment and banishment from the College of Law building, and compelling the University to reinstate Plaintiff to teaching for the spring 2026 semester starting on January 12, 2026, as more fully set forth in the Plaintiffs Proposed Order. Dkt. 20.

Respectfully submitted,

/s/ Rima N. Kapitan

Joe F. Childers & Associates
Joe F. Childers
The Lexington Building
201 West Short Street
Suite 300
Lexington, Kentucky 40507
Phone: 859-253-9824
Joe@Jchilderslaw.com

Kapitan Gomaa Law, P.C.

Rima Kapitan (IL Atty No. 6286541)
Hannah Moser (IL Atty No. 6349688)
P.O. Box 6779
Chicago, IL 60680
Phone: (312) 566-9590
rima@kapitangomaa.com

CAIR Legal Defense Fund
Lena F. Masri (VA 93291)
lmasri@cair.com
Gadeir Abbas*(VA 81161)
gabbas@cair.com
Catherine Keck (DC 90027891)
ckeck@cair.com
Ahmad Kaki (VA 101167)
akaki@cair.com
453 New Jersey Ave., S.E.
Washington, DC 20003
Phone: (202) 742-6420
Fax: (202) 488-0833

**Licensed in VA, Not D.C.*
Practice limited to federal matters.

Hawks Quindel S.C.
Summer Murshid (WI Atty No. 1075404)
M. Nieves Bolaños (IL Atty No. 6299128)
Patrick Cowlin (IL Atty No. 6308800)
Illinois Attorney No.
111 E. Wacker Drive
Suite 2300
Chicago, IL 60601
Phone: (312) 224-2423
mnbolanos@hq-law.com