COMMONWEALTH OF KENTUCKY
FRANKLIN CIRCUIT COURT
DIVISION I
CONSOLIDATED CIVIL ACTION NOS. 26-CI-00885; 26-CI-01010; 26-CI-01017

Ramsi A. Woodcock,

Plaintiff,

v. Hon. Phillip J. Shepherd

University of Kentucky et al.,

Defendants.

PLAINTIFF'S MOTION FOR LEAVE TO FILE VERIFIED AMENDED AND SUPPLEMENTAL COMPLAINT

Plaintiff Ramsi A. Woodcock moves under CR 15.01, CR 15.04, and CR 21 for leave to file the tendered Verified Amended and Supplemental Complaint in Nos. 26-CI-01010 and 26-CI-01017. In support, Woodcock states as follows:

1. On July 20, 2026, Woodcock filed a complaint in Fayette Circuit Court (No. 26-CI-03325). That action was transferred to this Court and docketed as No. 26-CI-01017. On September 10, 2026, Woodcock filed a Verified Complaint in this Court (No. 26-CI-01010). Those actions are consolidated with No. 26-CI-00885.

2. On October 9, 2026, the University officials moved to dismiss the complaint in No. 26-CI-01010. The same day, the Attorney General, appearing under KRS 418.075 to defend 2025 Senate Joint Resolution 55 ("SJR 55"), moved to dismiss the count of the complaint in No. 26-CI-01017 that challenges SJR 55. Neither action has an answer, discovery, or a scheduling order. The Court removed the October 28, 2026 argument on the motions to dismiss from its calendar pending resolution of the amendment.

3. The tendered Verified Amended and Supplemental Complaint restates in a single pleading the claims in Nos. 26-CI-01010 and 26-CI-01017 and supersedes the complaints in those actions in their entirety. It supplements those complaints with transactions and events that have occurred since September 10, 2026. It names the Attorney General, in his official capacity, as a defendant on the count that challenges SJR 55. It leaves undisturbed the complaint in No. 26-CI-00885, which remains operative.

4. The tendered pleading also differs from the earlier complaints as follows. First, it pleads what has happened since September 10, 2026: this Court's September 24, 2026 Order and the University's lifting of the building ban four days later while it kept the suspension in place; the Dean's statement on October 13, 2026 that no other restriction had been reviewed; the conduct of the final stages of the investigation, including the Second Evidence Review; the University's removal of Woodcock from teaching for a third consecutive semester and a draft schedule that leaves him out for a fourth; and records the University released on November 5, 2026 showing that it has been billed more than $848,000 for the work of the investigator's law firm, an engagement for which the Governor's office has located no record of the approval KRS 12.210 requires. Second, it adds claims that arise from the same course of conduct: retaliation in violation of KRS 344.280(1) for Woodcock's reports and complaints of discrimination and his suits under KRS Chapter 344; aiding and abetting that retaliation in violation of KRS 344.280(2); and arbitrary action in disregard of the University's own rules, in violation of Section 2 of the Kentucky Constitution. Third, it pleads facts that bear on the arguments made in the pending motions to dismiss, including the length and consequences of the suspension, the removal of Woodcock's named professorship, the sources of his property interest in his tenure and the University's regulations, and the absence of any hearing. Fourth, it states that it asserts only claims under Kentucky law and expressly reserves Woodcock's federal claims for decision by the federal court, which answers the Attorney General's claim-splitting argument.

5. Leave to amend "shall be freely given when justice so requires." CR 15.01. On motion and reasonable notice, the Court may permit a party to serve a supplemental pleading "setting forth transactions or occurrences or events which have happened since the date of the pleading sought to be supplemented." CR 15.04. Parties may be added "by order of the court on motion." CR 21. Because no responsive pleading has been served in either action, Woodcock could amend the complaints once as a matter of course, CR 15.01; he seeks leave because the tendered pleading also supplements them and adds a party, and so that the consolidated actions proceed on a single pleading by order of the Court. Leave is warranted. The cases are at the pleading stage. Woodcock moves promptly after the events and records the supplement describes. The amendment is not the product of undue delay or bad faith. It will not prejudice Defendants, who will be able to respond to the new pleading in full under the schedule proposed below. A single, current pleading in place of two earlier complaints will also simplify the motions practice that follows and conserve the resources of the parties and the Court.

6. Because the tendered pleading supersedes the complaints at which the pending motions to dismiss are directed, those motions will be moot once leave is granted. Woodcock asks that they be denied as moot, without prejudice to any motion directed at the Verified Amended and Supplemental Complaint.

7. Woodcock proposes the following schedule: Defendants and the Attorney General shall file any motions directed at the Verified Amended and Supplemental Complaint within 30 days after entry of an order granting leave; Woodcock shall respond within 30 days after those motions are filed; and any replies shall be due within 14 days after the responses, with a hearing to be set by the Court.

8. The tendered pleading challenges the constitutionality of SJR 55. As KRS 418.075 requires, a copy of the tendered pleading has been served on the Attorney General, who has already appeared in these actions to defend SJR 55.

9. Counsel for Woodcock circulated the proposed pleading to counsel for Defendants and the Attorney General on October 22, 2026, and a revised version on October 29, 2026, and asked whether they would consent to an agreed order granting leave and setting the schedule above. Counsel for the University Defendants advised that the proposed schedule is acceptable but has not stated whether Defendants consent to the filing. The Attorney General has not stated a position.

WHEREFORE, Woodcock respectfully requests that the Court enter the tendered order (1) granting leave to file the Verified Amended and Supplemental Complaint, which shall be deemed filed as of the date of the order, and adding the Attorney General, in his official capacity, as a defendant; (2) denying as moot the pending motions to dismiss the complaints in Nos. 26-CI-01010 and 26-CI-01017; and (3) setting the schedule proposed above.

NOTICE

Please take notice that the foregoing motion will be heard at the Court's civil motion hour on Wednesday, November 18, 2026, at 9:00 a.m., or as soon thereafter as counsel may be heard.

Date: November 6, 2026

Respectfully submitted,

/s/ Soha Saiyed

/s/ Rima Kapitan

/s/ Joe F. Childers

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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2026, the foregoing motion, the tendered Verified Amended and Supplemental Complaint with its exhibits, and the tendered order were filed through the Kentucky Court of Justice eFiling system, which will send notice of filing to all counsel of record, including counsel for the Attorney General.

/s/ Rima Kapitan

Counsel for Plaintiff