UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION AT LEXINGTON
CASE NO. 5:25-cv-00424-BJB

RAMSI A. WOODCOCK PLAINTIFF

v.

ELI CAPILOUTO, *et al.*; DEFENDANTS

NOTICE OF COMPLETION OF INVESTIGATION

Defendants President Eli Capilouto, Provost Robert DiPaola, General Counsel William Thro, Former College of Law Dean James Duff, and Current College of Law Dean Gregory Van Tatenhove (collectively the "University Officials") give notice that that University's outside independent Investigator has completed the investigation.

The Investigator has sent a copy of her Factual Investigation Report to Woodcock. The Factual Investigation Report is 100 single spaced pages, contains 750 footnotes, and a 34-page appendix identifying the evidence review table of contents. To protect the identity of the reporters and witnesses and to comply with the Family Educational Rights and Privacy Act [1] the names of witnesses have been replaced with numbers and certain redactions have been made. Upon entry of an appropriate protective order, the Investigator will provide Woodcock with a copy which includes the names of witnesses and removal of all redactions.

[1] 20 U.S.C. § 1232g.

If the Court wishes, the University Officials will provide an unredacted copy to the Court for in camera review. Similarly, if the Court wishes for the final Factual Investigative Report to be part of the record, the University officials will submit a redacted copy.

Under the terms of the Franklin Circuit Court's September 24, 2026 Order,[2] the University officials must give Woodcock ten days' notice before taking "further disciplinary action." Although the University Officials believe that Kentucky's doctrine of Exclusive Concurrent Jurisdiction precludes the Franklin Circuit Court from conducting any proceedings until the complete resolution of the proceedings in this Court,[3] the University Officials will abide by the September 24, 2026 Order. Once the President has decided whether disciplinary proceedings are appropriate, the University Officials will give Woodcock ten days' notice before acting.

Respectfully submitted,

/s/ Bryan H. Beauman
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&

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[2] *See* Order attached as Exhibit 1.
[3] *Beshear v. Ridgeway Properties*, 647 S.W.3d 170, 179 (Ky. 2022).

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Counsel for Defendants President Eli Capilouto, Provost Robert DiPaola, General Counsel William Thro, Former Dean of the College of Law James Duff in his personal capacity, and Current Dean of the College of Law Gregory Van Tatenhove

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2026, the foregoing document was electronically filed using the Court's CM/ECF system, which will send notification of such filing to all parties registered to receive electronic filings.

/s/Bryan H. Beauman
Counsel for Defendants President Eli Capilouto, Provost Robert DiPaola, General Counsel William Thro, Former Dean of the College of Law James Duff in his personal capacity, and Current Dean of the College of Law Gregory Van Tatenhove