

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

AMERICAN ALLIANCE
FOR EQUAL RIGHTS and DO NO
HARM,

Plaintiffs,

v.

BUCKFIRE & BUCKFIRE, P.C.,

Defendant.

Case No. 2:25-cv-13617-TGB-APP

JOINT STIPULATION OF DISMISSAL

Per Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties stipulate to the following:

1. Plaintiffs, American Alliance for Equal Rights and Do No Harm, filed this lawsuit on November 13, 2025, against Defendant, Buckfire & Buckfire, P.C. Plaintiffs challenged the legality of two scholarships run by Defendant: the Law School Diversity Scholarship and the Medical Diversity Scholarship.

2. When Plaintiffs filed suit, Defendant's websites stated that applicants to these scholarships must be "a member of an ethnic, racial, or other minority or any individual who demonstrates a defined commitment to issues of diversity within their community." *Medical Diversity Scholarship*, Buckfire Law, perma.cc/ZKS7-8RZC (archived Jan. 30, 2026); *Law School Diversity Scholarship*, Buckfire Law, perma.cc/6WG2-VQH6 (archived Jan. 30, 2026).

3. Plaintiffs alleged that the scholarship programs violated 42 U.S.C. §1981 by discriminating based on race and ethnicity. Defendant denies these allegations.

4. To make clear that the scholarships are open to all, the following will be added to Defendant's websites for the scholarships:

- a. Buckfire & Buckfire, P.C. does not limit "diversity" to any one experience, characteristic, or circumstance.
- b. "Diversity" includes all the various ways that make individuals unique.
- c. Buckfire & Buckfire, P.C. recognizes that students of all backgrounds can be committed to diversity. When assessing applications and selecting winners, Buckfire & Buckfire, P.C. does not give preferences to students based on race, sex, ethnicity, or any other immutable characteristic.

5. Buckfire & Buckfire, P.C. will also revise certain statements on its websites for the scholarships, including the following statements and any statements that are materially similar:

- a. In order to be considered for the scholarship, the student must ~~be a member of an ethnic, racial, or other minority, or~~ demonstrate a commitment to issues of diversity **of all kinds** within their community.
- b. The scholarship, established in 2014, is part of the law firm's initiative to recognize medical school students who do outstanding work to promote ~~ethnic~~ diversity **of all kinds** in their community.

- c. Recipient is ~~a member of an ethnic or racial minority~~ or any individual who demonstrates a defined commitment to issues of diversity within their academic career.
 - d. Applicant is ~~a member of an ethnic, racial, or other minority~~ or any individual who demonstrates a defined commitment to issues of diversity within their community.
 - e. A one-page typed essay describing how you have utilized your time promoting ~~ethnic~~ diversity within your community. Alternatively, you may write about how you will use your [law/medical] degree to promote ~~eth-~~
~~nic~~ diversity in the future.
6. Buckfire & Buckfire, P.C. will also remove the question on the scholarship applications asking applicants to identify their race or ethnicity. When reviewing a student's scholarship application, Buckfire & Buckfire, P.C. does not consider any applicant's race or ethnicity.
7. Plaintiffs will not be paid any nominal damages, relief, or other damages, and Members will not receive scholarship funds.
8. The case is hereby dismissed with prejudice, with both sides to bear their own fees and costs.

Dated: February 27, 2026

/s/ Cameron T. Norris

John A. Di Giacomo (P73056)
REVISION LEGAL PLLC
444 Cass Street Ste. D
Traverse City, MI 49684
(231) 714-0100
john@revisionlegal.com

Thomas R. McCarthy
(D.C. Bar #489651)
Cameron T. Norris
(VA Bar #91624)
R. Gabriel Anderson
(TX Bar #24129302)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com
cam@consovoymccarthy.com
gabe@consovoymccarthy.com

Counsel for Plaintiffs

Respectfully submitted,

/s/ Lawrence J. Buckfire

Lawrence J. Buckfire (P42841)
Robert J. Lantzy (P57013)
BUCKFIRE LAW FIRM
28411 Northwestern highway, Ste. 300
Southfield, MI 48034
(248) 569-4646
robert@buckfirelaw.com
larry@buckfirelaw.com

Counsel for Defendant