

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Haishan Yang,

Case No. 25-CV-00089(JMB/SGE)

Plaintiff,

v.

**MOTION FOR
REFERRAL TO THE PRO SE
PROJECT**

Hannah Neprash et al.,

in their individual and

official capacities,

Defendants.

Plaintiff, Haishan Yang, respectfully moves this Court to refer this case to the Pro Se Project for assistance in securing pro bono legal assistance.

I. INTRODUCTION

Plaintiff, a pro se litigant, respectfully requests that this Court refer this case to the Pro Se Project to assist in securing a consultation with a volunteer attorney or in seeking legal representation.

The Pro Se Project, a collaboration between the U.S. District Court for the District of Minnesota

and the Minnesota Chapter of the Federal Bar Association, provides unrepresented litigants with access to volunteer attorneys. Plaintiff seeks legal assistance to effectively litigate this complex civil rights action arising under 42 U.S.C. § 1983, alleging due process violations by Defendants.

II. RELEVANT FACTUAL AND PROCEDURAL BACKGROUND

Plaintiff has filed a verified complaint against the Defendants, who are officials of the University of Minnesota (“the University”), alleging procedural due process violations. The case involves factual and legal complexities, including the use of altered evidence in disciplinary proceedings that resulted in Plaintiff’s expulsion, loss of student visa status, and significant financial and reputational harm.

To the best of Plaintiff’s knowledge, this is the first case in which the University has expelled a student for AI-related scholarly dishonesty. Furthermore, this is the first case in federal court addressing AI and scholarly dishonesty. As such, this case will set a precedent for the nation regarding how AI-related academic integrity disputes are adjudicated.

Since January 7, 2025, as a direct consequence of Plaintiff’s expulsion from the University, Plaintiff has lost the job as research assistant at the University and no longer has legal status to remain in the United States. This has caused enormous financial hardship and made it significantly challenging for Plaintiff to secure legal representation or to physically appear in court to represent himself. Plaintiff has sent more than 30 emails to various law firms in Minnesota in an effort to obtain counsel, but has been unable to secure representation due to both the novelty of this AI-related case and financial constraints.

A copy of the First Amended Verified Complaint has been filed in this matter.

Plaintiff anticipates filing further amendments to address legal deficiencies in the First Amended Complaint. However, the fundamental need for referral to the Pro Se Project remains unchanged.

III. LEGAL BASIS FOR REFERRAL

1. **Complexity of Legal and Procedural Issues:** This case presents intricate due process claims under the Fourteenth Amendment, requiring expertise in federal civil rights law and university disciplinary procedures. In addition, as AI is an emerging technology, many attorneys have no prior experience handling related cases.
2. **Plaintiff's Inability to Secure Counsel:** Plaintiff has made good-faith efforts to obtain legal representation but has been unsuccessful due to financial constraints and the complexity of the case.
3. **Interests of Justice and Judicial Efficiency:** A referral to the Pro Se Project would promote judicial efficiency by ensuring that Plaintiff can navigate the legal process effectively, reducing unnecessary procedural errors and delays.
4. **Precedent for Referral in Similar Cases:** The Pro Se Project has successfully assisted litigants in civil rights and due process cases, demonstrating its effectiveness in providing access to justice for unrepresented individuals.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court enter an order referring this matter to the Pro Se Project to facilitate a consultation with a volunteer attorney or to assist in seeking legal representation.

Plaintiff acknowledges the Court's denial of the Temporary Restraining Order. However, Plaintiff believes that the actions of Defendants were taken in bad faith and substantially departed from

academic norms. Plaintiff intends to provide additional evidence supporting this claim in a forthcoming Second Amended Complaint, preferably with the assistance of a pro bono attorney in this pro se project.

Given Plaintiff's ongoing financial hardship, lack of legal status in the U.S., and inability to obtain legal counsel despite diligent efforts, Plaintiff respectfully requests that this Motion be considered on an expedited basis if the Court deems it appropriate.

V. SUPPORTING DOCUMENTS

This Motion is supported by the following documents:

- a. Declaration in Support of Motion: A sworn statement by Plaintiff providing factual support for this Motion.

Dated: February 18, 2025

Respectfully submitted,

Haishan Yang

Handwritten signature of Haishan Yang in black ink.

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