

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

JANE DOES 1-12

Plaintiffs,

v.

LIBERTY UNIVERSITY, INC.

Case No.: 2:21-cv-03964-JMA-ARL

STATUS REPORT

On or about October 12, 2021, this Court ordered Plaintiffs to file a status report not later than October 19, 2021; this Report responds to that Order.

Plaintiffs are Jane Does 1-through-12, and are former Liberty University students and/or employees, each of whom allege violations of Title IX while at Liberty University. On or about July 14, 2021, undersigned counsel filed a Motion for Leave to Appear Pro Hac Vice on behalf of the twelve plaintiffs. The Clerk advised undersigned counsel that no Judge would be assigned and no action would be taken on the Motion until a Complaint was filed and, as a result, on July 20, 2021, undersigned counsel filed a Complaint on behalf of the Plaintiffs. The filed Complaint was communicated to Liberty University's General Counsel on or about the same day. A summons was issued to Liberty University on July 21, 2021.

Since the Complaint was filed, additional plaintiffs and witnesses have come forward. It is likely that, if the case does not resolve amicably, a First Amended Complaint will be filed on behalf of Jane Does 1-through-22, including certain current students at Liberty University.

Defendant Liberty University has requested an opportunity to discuss an amicable resolution prior to the filing of a First Amended Complaint, and specifically asked *not* to be served or to waive service during that discussion period (so as not to begin the clock of responding to the Complaint or First Amended Complaint.) The parties have begun working on the logistics of the University's request, and anticipate a mediation in the near-future.

It is accordingly respectfully requested that:

- (1) This Court grant undersigned counsel's Motion for Leave to Appear Pro Hac Vice; and
- (2) This matter be placed on standby or the parties otherwise permitted to explore an amicable resolution for a period of three-months.

Respectfully submitted:

Date: *October 14, 2021*


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