

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

STUDENTS AGAINST ANTISEMITISM, INC.,  
STANDWITHUS CENTER FOR LEGAL JUSTICE,  
MILES RUBIN, DANIELLA SYMONDS, ERIN  
MCNULTY, NOAH MILLER, and VALERIE  
GERSTEIN,

Plaintiff

Case Number

vs.

1:24-cv-01306

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THE TRUSTEES OF COLUMBIA  
UNIVERSITY IN THE CITY OF NEW YORK,  
and TRUSTEES OF BARNARD  
COLLEGE,

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

MACKENZIE FORREST,

Plaintiff

Case Number

vs.

1:24-cv-01034

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THE TRUSTEES OF COLUMBIA  
UNIVERSITY IN THE CITY OF NEW  
YORK, MINOUCHE SHAFIK, ANDRE  
IVANOFF, and ELIZABETH CREEL,

Defendant

## Status of Earlier Filed Case:

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint was filed on February 12, 2024, approximately one week before the complaint in the newly filed case. The case is assigned to the Honorable J. Paul Oetken.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The newly filed case is related to the earlier filed case in that both cases: (1) name Columbia as a defendant; (2) concern Columbia's response to allegedly antisemitic conduct on campus following Hamas's October 7, 2023 attack on Israel; (3) were brought by Columbia students who were allegedly subjected to such conduct; and (4) assert nearly identical causes of action against Columbia. While the earlier filed case focuses on one student's experience with alleged antisemitism, the alleged events in both complaints overlap substantially — including in particular with respect to the Columbia School of Social Work, where the plaintiff in the earlier filed case is enrolled. Moreover, both cases seek damages and similar forms of injunctive relief against Columbia in connection with alleged violations of federal and New York antidiscrimination laws, including Title VI of the Civil Rights Act of 1964, the New York State Human Rights Law, and New York State Civil Rights Law § 40-c, and New York consumer protection law, as well as claims for breach of contract alleging a failure to comply with the same set of university antidiscrimination policies. In sum, these actions involve significant factual overlap and substantially similar parties and claims, requiring the adjudication of similar questions of fact and law. Allowing the cases to proceed separately would almost certainly result in a substantial duplication of effort and expense for the Court, the parties, and any witnesses, and would raise a serious risk of subjecting Columbia to conflicting orders. In view of all the above, Columbia respectfully requests that the newly filed case be treated as related to the earlier filed case.

Signature: /s/ Roberta A. Kaplan Date: 2/22/2024

Kaplan Hecker & Fink LLP

Firm: \_\_\_\_\_