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Today four UConn students or former students have filed a lawsuit against the University of Connecticut (UConn) alleging that UConn has violated their rights under Title IX by failing to afford them the protection and rights that should have been afforded to them as survivors of rape or sexual assault when they were students at UConn.

The lawsuit was filed today in federal court in Hartford Connecticut (Docket No.: 13-CV-1605) by Carolyn Luby, Kylie Angell, Erica Daniels, and Rosemary Richi. They are represented by Nina Pirrotti, a prominent Connecticut attorney, and the lawsuit reflects my motion *pro hac vice* to the court seeking the court's permission to co-counsel on this case with Ms. Pirrotti and her law firm.

The lawsuit seeks an injunction and damages for discrimination on the basis of gender and retaliation in violation of Title IX, which guarantees equal educational opportunity to students at educational institutions such as the University of Connecticut.

The injunction which we are seeking asks the court to order UConn to revise its policies, procedures and practices so that it is in compliance with Title

IX. In addition, we are asking for an award of compensatory damages to the plaintiffs for their emotional distress, which resulted from UConn's deliberate indifference to them. Further, we are seeking any other relief that is deemed just and proper and an award of attorneys' fees and costs in litigating this matter.

Last week these same four plaintiffs and three other UConn students filed a Title IX complaint with the Office of Civil Rights (O.C.R.), U.S. Department of Education. In that complaint the seven young women asked for an investigation of UConn in reference to UConn's mishandling of their reports of rape or sexual assault. If O.C.R. finds that UConn violated Title IX the University could face sanctions, including but not limited to the potential loss of federal funds.

The lawsuit filed today, however, is a private lawsuit by four of these women seeking an injunction and damages. It is a different and additional legal option for our clients.

Last week UConn President, Susan Herbst, appeared to question the motivation of the seven young women who filed their Title IX complaint with the Office of Civil Rights. In reacting to the allegations of the students who alleged that UConn was deliberately indifferent to their reports of rape and sexual assault, she said in her statement to the UConn Board of Trustees, "I cannot speak to the motivations of people who have suggested this." In other words, she appeared to

impugn the student's motives while defending the University and the UConn police even though one of the former students had stated a UConn police officer told her that "Women need to stop spreading their legs like peanut butter or rape is going to keep on happening till the cows come home."

President Herbst apparently believes that all is well at UConn. She appears not to understand or care about the serious problems that exist at this University.

We are hopeful that our lawsuit will help the University fully understand their legal obligations under federal law to protect its students and to treat them with sensitivity and respect when they file reports of rape and sexual assault. In other words they must be afforded due process, be made safe and not be retaliated against or have their motives questioned when they speak out in an effort to assure that their University is in compliance with Title IX.

As a result of the lawsuit which the students filed today, President Herbst will not be able to hide behind empty words. Instead she will be compelled to testify under oath and she and the University will be held accountable for their behavior in the cases in which we have filed.

We are very proud of the young women who are plaintiffs in this case. They have demonstrated true courage in speaking out. They have spoken truth to power, and they did so to try to make their University a safer and better place for

all UConn students. They deserve to be commended and not criticized for their courage.

The need for them to have spoken out is clear. For example I have now learned from reliable sources that yet another UConn student alleges that she was raped last weekend by another UConn student. This new allegation of sexual assault once again highlights the need for UConn to take the students' allegations seriously.

We thank Governor Malloy and leaders of the State Legislature who have indicated that they believe there should be legislative hearings into the students' allegations against UConn.

We look forward to these hearings, to President Herbst's testimony under oath, and to vigorously prosecuting our lawsuit.

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