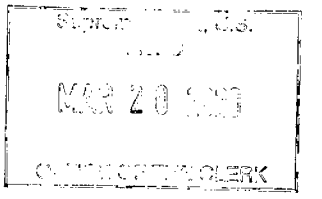
RKB

No. 19-7135

In the Supreme Court of the United States



HYE-YOUNG PARK, a/k/a LISA PARK—PETITIONER

v.

Charles Secolsky, Robert E. Stake, Michal T. Hudson, Heidi Johnson,

and the Board of Trustees of the University of Illinois—RESPONDENTS

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

PETITION FOR REHEARING

Pro se, Petitioner, Hye-Young Park

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ISSUES PRESENTED.

The following issues indicate "the character of the reasons the Court considers" in Supreme Court "Rule 10. Considerations Governing Review on Writ of Certiorari."

1. Seventh Circuit's decision is far from the usual course of judicial proceedings.

The Seventh Circuit "has so far departed from the accepted and usual course of judicial proceedings" as their decisions in favor of Defendants were based on fabricated lies from Courts, Defendants, and Attorneys.[1]

2. Seventh Circuit's decision conflicts with a decision by the Illinois Supreme Court.

The Seventh Circuit has decided Park's § 1981 and § 1983 claims "in a way that conflicts with a decision" in *Leetaru v. Board of Trustees of the University of Illinois*, 2015 IL 117485.

This case concerns the sexual misconduct of two senior scholars, Robert E. Stake, a professor at the University of Illinois, and Charles Secolsky, a visiting scholar who worked under Stake's authority. This case also regards negligence and retaliation from the Office of Diversity, Equity, and Access (ODEA) against Hye-Young Park. Thus, she filed a lawsuit. However, many decisions made by the District Court and the Seventh Circuit were founded on fabricated lies.

This petition raises fundamental questions of our justice system: (1) Will we allow fabricated lies to dictate decisions in our US justice system? & (2) Will we allow sovereign immunity to protect University Defendants even when "the State's agent acted in violation of

[1] Note that Rule 15.2 requires that Defendants "address any perceived misstatement of fact" in Park's petition for writ of certiorari; they waived their right to respond. In other words, Defendants did not object to the fact that the Seventh Court's orders were founded on multiple fabricated facts.

statutory or constitutional law or in excess of his authority"? (*id*, ¶ 45). Nine years of pain, anger, and suffering consumed Park's life due to deception. This petition sheds light on malpractice that occurs in our justice system not only in this case, but in cases nationwide. It is both our duty to fight against such malpractice in order to maintain an honorable court system for We the People.

FABRICATED LIES

Fabricated lie #1: University Defendants fabricated lies that Park had no status at the University; therefore, they had no jurisdiction over her complaints.

Michal T. Hudson (Senior Title IX Specialist) and Heidi Johnson (Director) of the ODEA have and continue to claim to this day that Park had no status;[2] that "unless you [Park] can demonstrate that the inappropriate behavior occurred while you were either employed by or were a student at the university, this office has no jurisdiction over your matter[;]"[3] and therefore, "[n]o further action, by this office, is necessary at this time." (ODEA Reports). Kaamilyah Abdullah-Span (Hudson's supervisor) also stated in her email to the Associate Chancellor that ODEA did "not have jurisdiction to respond to Ms. Park's allegations."[4]

However, ODEA was repeatedly informed of Park's employment from the first day through documentation and even through confirmation by Julie Misa, Director of the University's International Student and Scholar Services (ISSS).[5]

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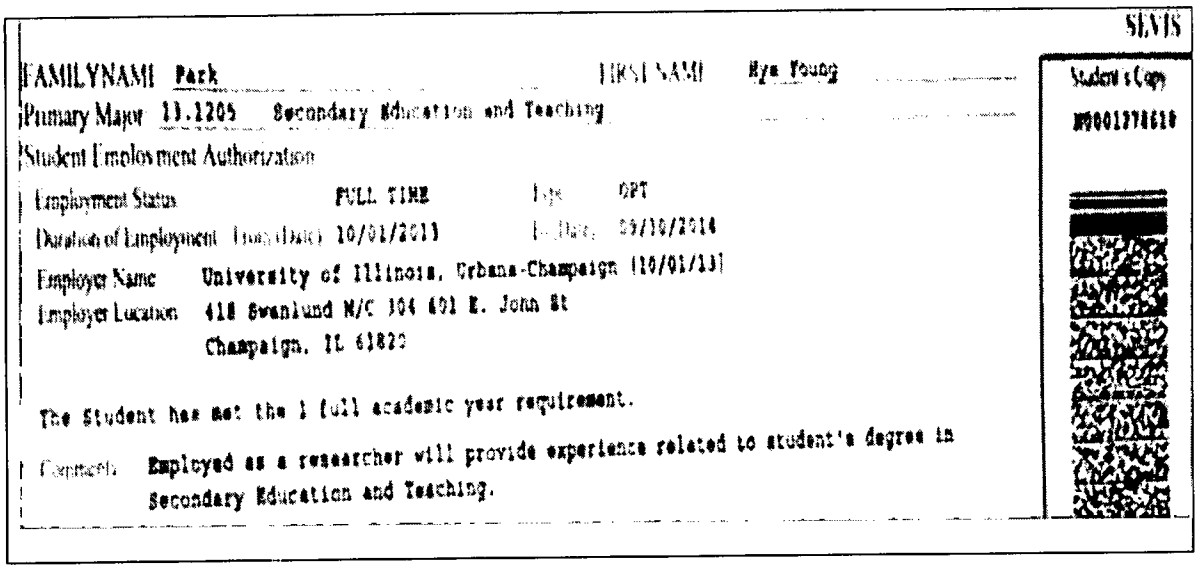
[2] See Appendix pp.16-20 for evidence of their continuous no status claim.
[3] See Appendix p.16 for Hudson's emails.
[4] See Appendix p.20 for Abdullah-Span's email. During the discovery, Park found that in addition to Hudson and Johnson, several University officials worked together to get rid of Park, which includes Kaamilyah Abdullah-Span (Senior Associate Director) and Menah Pratt-Clarke (Associate Provost for Diversity).
[5] See Appendix p. 72 for Misa's email to Hudson in the District Court Order #162.

Relevant to Case 15-2136, Park was "[e]mployed as a researcher" at the University of Illinois, Urbana-Champaign with her F1 student visa as shown in her I-20 below (Oct. 2013 – Nov. 2014 including a two-month grace period):



SEVIS

FAMILYNAME Park FIRST NAME Hye Young

Primary Major 13.1205 Secondary Education and Teaching

Student Employment Authorization

Employment Status FULL TIME Type OPT

Duration of Employment (start date) 10/01/2013 (end date) 09/30/2014

Employer Name University of Illinois, Urbana-Champaign (10/01/13)

Employer Location 418 Swanlund M/C 304 601 E. John St
Champaign, IL 61820

The Student has met the 1 full academic year requirement.

Comments Employed as a researcher will provide experience related to student's degree in Secondary Education and Teaching.

Student's Copy

Fabricated lie #2: The Seventh Circuit fabricated lies by stating that ODEA concluded they had no obligation as to Park's complaints because Secolsky had no status at the University.

The Seventh Circuit fabricated lies, falsely stating, "ODEA concluded that because Secolsky had no existing affiliation with the university, it lacked the authority to regulate his conduct." (#74, p.3, 18-3017).

However, ODEA initially informed Park of their obligation over her complaints. In her emails to Park, Hudson stated, "[n]ow that you [Park] have put our office on notice, I have an obligation to follow up on this matter[,]" and, regardless of Secolsky having no status as they

claimed, "I still have an obligation as it relates to inappropriate conduct on this campus."[6] Nevertheless, they did not protect her.

After Secolsky's retaliation due to ODEA's negligence, they continued to not protect her, but this time by rejecting Park's status, as Johnson stated in her deposition, that ODEA "had already determined Lisa Park was not affiliated." (#129, p.40, 15-2136). ODEA then revoked their initial obligation, and told Park, "unless Plaintiff [Park] could demonstrate that the inappropriate behavior occurred while Plaintiff was either an employee or affiliated with the University, ODEA did not have jurisdiction over the matter." This was also acknowledged by the District Court (#162, pp.15-16, 15-2136). This is critical to the Court decision over Park's retaliation claims against University Defendants, as discussed in the next section.

Fabricated lie #3: The District Court fabricated lies by stating that ODEA did their job regarding Park's complaints.

From the beginning, ODEA was informed of (1) Secolsky's activities as an instructor/researcher & program director; (2) Park's academic involvement with Secolsky at the University; & (3) Secolsky's misconduct. See Appendix pp. 21-52 herein. Yet, they did not protect Park although they initially stated their obligation over Park's complaints and although Title IX of the Education Amendments of 1972 (prohibiting discrimination based on sex) covers even third parties such as visitors; Secolsky was a "visiting researcher at the Center for Institutional Research and Curriculum Evaluation (CIRCE) at the University of Illinois from 2012 to 2014." (#212-1, pp.3, 15-2136). This is a violation of the University "Policy and Procedures for Addressing Discrimination and Harassment."[7]

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[6] See Appendix pp.70-71 for Hudson's email to Park.

[7] See Appendix pp.75- 87 for the University Policy and Procedures.

Due to Secolsky's continuous sexual harassment, Park continued to contact ODEA. She contacted Hudson but received no response; she tried to meet with Hudson's supervisor, but was denied access. In the meantime, Park searched for other solutions including visits to Human Resource Department (HR), which finally led to HR contacting ODEA.

Without informing or responding back to Park, Hudson then met Stake and Secolsky once respectively. This also is a violation of the University Policy, which state that ODEA must[8] first receive an "Informal Resolution Request Form" (IRRF) signed by Park, which would then lead to meeting with Park and discussing "what outcome or remedy she is seeking" listed on the form.[9] Such reckless intervention made matters even worse; after he learned about Park's complaints, he began to retaliate against Park in numerous ways. Park then alerted ODEA of Secolsky's retaliation; Title IX also covers retaliation. See Appendix p.83 for Title IX coverage.

To cover up their wrongdoings, ODEA then began to retaliate against Park as well. [10] Although they acknowledged "'Optional Practical Training ('OPT') is temporary employment'" and acknowledged Park's OPT (#125, p.5, 15-2136), they simultaneously and ignorantly denied Park's status. Their refusal to consider Park's OPT as a valid status concerns national origin discrimination, another violation of the University Policy which prohibits discrimination based on race, color, or national origin in any program under Title VI of the Civil Rights Act of 1964.

The ODEA's negligence and failure to help Park led to Secolsky's continual harassment and retaliation, which jeopardized Park's life as she subsequently suffered heart attack and was sent to the emergency room.[11] Throughout Park's suffering, Secolsky continued to teach at the

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[8] See Appendix p.80 for the University Procedures.
[9] See Appendix p. 87 for IRRF.
[10] See Appendix pp.53-58 for the University Defendants' retaliation against Park.
[11] See Appendix pp. 59-67 for Park's risky situation.

University, and the ODEA kept busy finding a way to legitimatize their exclusion of Park from their service as shown in Johnson's email to University Officials:

Johnson, Heidi

From:	Johnson, Heidi
Sent:	Tuesday, August 26, 2014 10:07 AM
To:	Hudson, Michal Thomas; Abdullah-Span, Kaamilyah
Subject:	RE: Lisa Park update

Do we have a statement from AHR stating that she is not considered an employee?

Hudson also shared with Johnson her "thought about disposing of this case as soon as possible" although she acknowledged, "Secolski's [sic] behavior as inappropriate."[12]

Likewise, Stake also failed to act; he stated he "took no action against Secolsky" regarding Park's complaint of Secolsky" (#21, p.2, 15-2136) and he "had no further involvement with Park's complains about Secolsky" (#41, p.23, 18-3017) although Secolsky was

> "a visiting researcher at the Center for Institutional Research and Curriculum Evaluation (CIRCE) at the University of Illinois from 2012 to 2014.(...) Secolsky 'substituted for' Stake in Stake's case study class, that he [Stake] had Secolsky 'take over, coordinating, helping' others, and that Secolsky 'did present a topic from [Stake's] syllabus' in place of Stake and (...) While visiting CIRCE, Secolsky engaged in grant writing, teaching case study methods and program evaluation, paper presentations, lectures on survey research methodology, accreditation, evolution of validity, computerized adaptive testing, and Bayesian statistics in mixed method research. Secolsky also advised and mentored doctoral students in Stake's case study classes." [13]

Nevertheless, the District Court fabricated lies that University Defendants and Stake were "not deliberately indifferent to any violation of Plaintiff's constitutional rights" regarding Secolsky's misconduct (#162, p.52, 15-2136), and that "[n]othing Defendants did or did not do

[12] See Appendix p.19 for Hudson's meeting note.

[13] See Appendix pp. 21-22 for Secolsky's activities at the University.

after June 21, 2014, caused Plaintiff to undergo harassment or made her liable or vulnerable to it" (id., p.50, internal citation omitted) despite putting Park's life in jeopardy.[14] Not only did both Stake and ODEA fail to do their jobs, they made matters worse.

Fabricated lie #4: University Defendants' Attorneys fabricated lies to show that "Dr. Secolsky did not harass, in any actionable way, Plaintiff after June 26, 2014."

University Defendants' Attorneys' lie was cunningly devised through suggestive questioning to a traumatized, troubled Park during her deposition and by quoting her words out of context. Citing Park's deposition, University Defendants' Attorneys crafted their argument (#125, p.14, 15-2136):

> "Between July 1, 2014 and August 2, 2014, Secolsky did not do anything Park considered to be sexual harassment. (Park Dep., pp. 259-260, 264-267, 15-2136)."

The District Court then agreed with their argument without due diligence:

> "Plaintiff herself testified in her deposition that, while Secolsky bothered her during the July 1 through August 2, 2014 period, he did not do anything she considered 'sexual harassment.'" (#306, p.3, 15-2136).

The truth is that during and after her deposition, Park continuously testified that Secolsky's sexual harassment continued even after she alerted ODEA: (Park Dep. #125-1, emphasis added):

[14] See Appendix pp. 59-67 for Park's psychological and physical injuries.

"**Q.** [Attorney] (...) I'm not saying there's not some out there that suggest any sexual harassment after the 25th of June, 2014. (...) I believe that your answers to the interrogatories are consistent with there having been no harassment after that date as well.
A. Did I [Park] mention phone calls? E-mails? All kind of things? I think I address the step by step, day by day. But, **I do remember there has been sexual harassment since -- since, after June 25th.**
Q. Okay" (pp.249-250).

***

Q. (...) So, we were discussing before we got sidetracked here, that **you allege there was sexual harassment by Dr. Secolsky to you after June 25th, 2014, do I understand that correctly**?
A. **Yes.**" (p.249).

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"**A. I am certain that there was sexual harassment** during July 1st to July 16th. That's why I keep sending [Hudson] e-mail to update, update, update, up until-" (p.253).

Park repeatedly submitted significant evidence of Secolsky's continuous sexual harassment and retaliation that occurred after June 21, 2014, which Secolsky admitted in his filings.[15] University Defendants were also aware of the evidence as they acknowledged Park's allegations that Secolsky continued to inappropriately engage her: "it has been determined that Respondent Secolsky, whom Complainant [Park] alleges continues to inappropriately engage her (...)" (ODEA Reports). However, University Attorneys fabricated lies that "Dr. Secolsky did not harass, in any actionable way, Plaintiff after June 26, 2014." (#125, p.59, 15-2136); Stake's attorney also stated, "Secolsky did not harass, in any actionable way, Dr. Park after June 21, 201[4]." (#125, p.20, 15-2136).

[15] See Appendix pp. 27-52 for Secolsky's continuous sexual harassment and retaliation that occurred after June 21, 2014. Park contacted ODEA more than 60 times.

Fabricated lie #5: Defendants and the Courts fabricated lies to show that Secolsky's misconduct occurred in the context of Park's private employment with Secolsky's company.

University Defendants' Attorneys argued, "Dr. Secolsky had no University-centric relationship with Plaintiff" (#125, p.41, 15-2136), which Stake's Attorneys copied verbatim, "Dr. Secolsky had no University-centric relationship with Plaintiff" (id., #126, p.19).

However, Park filed a detailed, two hundred and three-page long list of their University-related work from January 2014 to September 2014 numerous times to University Defendants and before the District Court.[16]

Nevertheless, the District Court sided with Defendants without due diligence although they acknowledged Park and Secolsky's University-related work throughout 2014 by stating:

> "Plaintiff worked with Secolsky on grant proposals including American Educational Research Association (AERA) grant proposal [through the University in Jan. 2014], a session at International Congress of Qualitative Inquiry (ICQI) conference at the University, a conference paper to the Center for Culturally Responsive Evaluation and Assessment (CREA) at the University [in Sept. 2014] and the Thailand Seminar Series at the University in [March & April 2014]." (#212-1, p.4, 15-2136).

Further, the District Court fabricated a false date, claiming, "this [evidence of Secolsky's continued sexual harassment submitted by Park] all came after Plaintiff had been hired by Secolsky to work for his private company on **July 1, 2014**." (#306, p.3, 15-2136); University Attorneys subsequently cited the Court's fabrication, stating, "The District Court pointed out that all of the materials in her motion to supplement referenced conduct that occurred after Plaintiff had been hired by Secolsky to work for his private company on July 1, 2014." (#44, p.15, 18-3225, emphasis added). Further, the Seventh Circuit also included another fabricated lie, stating,

[16] See Appendix pp.23-26 for a short list ; see also pp. 1-203, Case No. 18-cv-2090 for a detailed list.

"**Five months** after she began working for him, Secolsky decided to end her job" (#74, p. 3, 18-3017).

Park was not employed under Secolsky's company on July 1, nor was she employed for five months. Her only employment with his company lasted **two weeks,** from **July 15 to July 28**, which the District Court acknowledged, stating, "Plaintiff worked for Secolsky's company (...) for approximately two weeks (from July 15 to July 28, 2014), and she was paid for those two weeks." (#212-1, p.6 15-2136). Even during the two weeks, Park and Secolsky worked on University-related projects. [17]

Nevertheless, Defendants' Attorneys, the District Court, and the Seventh Circuit fabricated lies, claiming that Park "offered no proof that any harassing behavior from Secolsky took place in the context of the University after June 21, 2014" while providing not a single piece of evidence to support their claims, instead, providing false dates, time periods, and building upon each party's lies (#162 p.50, 15-2136).

Fabricated lie #6: Stake fabricated lies to show that he kissed Park on her forehead, not on her lips where he stuck his tongue into her mouth.

Stake had attempted to kiss Park several times before finally succeeding at Kamakura restaurant on October 14, 2013. As they had finished lunch and said their goodbyes, Stake suddenly and unexpectedly advanced and aggressively forced his tongue into Park's mouth. He then quickly fled out of the restaurant.

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[17] The District Court also acknowledged Park and Secolsky's University-related work during those two weeks, stating, "Plaintiff provides an email from July 28, 2014, indicating that she and Secolsky worked on a project for the Culturally Responsive Evaluation and Assessment (CREA) program at the University. The project was presented on September 18-20, 2014" (#306, p.4, 15-2136).

Stake admits that he assaulted Park in the sense that he attempted to kiss her previously,[18] but he contends that his successful kiss was upon her forehead. Stake claims that his kiss was "the product of a paternal instinct" (#41, p.3, 18-2137) to comfort Park when she allegedly became upset because he urged "her to change her plan for dissertation research." (#126-10, p.51, 15-2136). He further claims that "Park neither said anything nor did anything for the first 30 or 60 seconds after the kiss while Stake was in her presence" (#142, p.5, 15-2136).

Stake's testimony is clearly questionable given the following facts. Prior to asserting that his kiss was "on her forehead," Stake took precautions by never denying Park's assertion that his kiss was on her lips three times through his filings[19] because Park suggested finding CCTV evidence.[20] It was only after learning that Park did not obtain the CCTV when Stake, for the first time on October 24, 2017, began to assert that the kiss was definitely "on her forehead " after years of uncertainty. (#143-1, p.1, 15-2136).

However, Park underwent her forehead scar correction surgery on September 2013, a month prior to meeting at Kamakura, and received surgery treatments until September 25.[21] Had if Stake's kiss been on her sensitive forehead, she would have recoiled from the pain.

Further, Stake justified that his kiss was to comfort Park after he urged her to change her dissertation plan. However, Park had already finished her dissertation in May 2013 and earned her Ph. D. in August 2013.

It also became evident that Park was not the only victim to Stake' sexual misconduct when, during Park's lawsuit, she received a package from an anonymous lady. The lady shared her similar experiences to Park as she claims that Stake also abused his authority to sexually

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[18] See #288, p.3, 15-2136.
[19] See #43, p.7; #59, p.7; #66, p.7. 15-2136, filed by Stake in February 29, April 11, & April 25, 2016.
[20] See Appendix p.73 for Park's email to Stake regarding the Kamakura CCTV.
[21] See Appendix pp. 68-69 for the evidence of Park's forehead scar correction surgery and treatments.

harass herself and many others. The package contained what she claims to be "confirmatory evidence of a decades-long pattern of sexually predatory behavior at CIRCE by Bob Stake and other men." (#191-1, 15-2136).[22]

Despite everything, the District Court ordered "Stake liable for the battery because he had kissed Plaintiff Park on the forehead at Kamakura Restaurant." (#273, p.5, 15-2136). The Court did not address any of the discrepancies listed above; nor did it allow critical evidence, such as the package and Park's email to Stake regarding the Kamakura CCTV, which would have unraveled Stake's lies to the jury.

Fabricated lie #7: The District Court fabricated lies that Park "can cite only to her claim" as to her claim of racial discrimination under equal protection against Secolsky.

The District Court stated: (#162, p.43, 15-2136, emphasis added).

> "[Park] can cite **only to her claim** that Secolsky commented about "American culture," and that he, at some other times, stated that 'Asian women like white men' and nothing else. The citation to just one rather ambiguous comment, and another comment where nothing about the context of the comment is known."

However, Park cited multiple testimonies by Secolsky where he admits to showing Park a pornographic video because "I [Secolsky] thought that Korean girls, Asian women, liked white guys" (Secolsky Dep., #128, pp. 114, 15-2136), and because "The truth of the matter is that I told Park about it would teach her about American culture [.]" (#138, p. 2, 15-2136).

On a separate occasion, Secolsky told Park that his girlfriend in New Jersey liked "blowjobs" and "mutual oral sex."(Secolsky Dep. #128, pp. 122-124). He told Park that the reason he bragged of his sexual exploits was because "Asian women like white [guys]." (Park

[22] See Appendix p.74. See also #s 191-192 for more evidence & #293, pp. 90-99, 15-2136 for the authenticity.

Dep. #125-1, p.153., 15-2136). Secolsky's racial remarks confirm that his sexual harassment also involves discrimination on race/ethnicity and national origin.

For these reasons, Park included discrimination on race and sex when filling out her ODEA intake form. However, this key information was not clarified during Park's trial.

Whether Park's report to the ODEA was based partly on racial discrimination was critical to the Jury's decision on her Count VII claim (Retaliatory Discharge) to the extent that the Jury foreperson asked District Court Judge Colin Bruce if he could "please clarify if the ODEA complaint was for racial discrimination accordance with Count VII, First paragraph ["Park claims that Charles Secolsky retaliated against her because of her complaints to the ODEA about racial discrimination."]" (#241, p.4, 15-2136).[23] See #309, pp.8-11, Case 15-2136 for details.

Judge Bruce did not provide clarification whether Park filed a complaint based partly on race. This lack of clarification greatly influenced the Jury's ultimate decision against Park regarding Count VII, which affects the decisions of Park's other claims against University Defendants. See #309, pp.8-11, Case 15-2136 for details.

Therefore, the District Court fabricated lies that Park only cited herself regarding her claim of racial discrimination under equal protection in Count IX; the Court did not provide the Jury with clarification as to Count VII, affecting the final verdict.

EXCEPTION TO THE DOCTRINE OF SOVEREIGN IMMUNITY

Sovereign immunity affords no protection when Defendants "acted in violation of statutory or constitutional law or in excess of authority."

[23] "Park need not prove the merits of her complaint to the ODEA, but only that she was acting under a reasonable, good faith belief that her right to be free from racial discrimination was violated." (#240, p.34, 15-2136).

Park's § 1981 and § 1983 claims against the University were dismissed under the doctrine of sovereign immunity. Such dismissal conflicts with the decision of the Illinois Supreme Court in *Leetaru v. Board of Trustees of the University of Illinois,* 2015 IL 117485:

> "The doctrine of sovereign immunity affords no protection, however, when it is alleged that the State's agent acted in violation of statutory or constitutional law or in excess of his authority" ¶ 45 (...) [or when] "the official is not doing the business which the sovereign has empowered him or her to do or is doing it in a way which the law forbids. (...)The purpose of the doctrine of sovereign immunity, after all is to 'protect[ ] the State from interference in its performance of the functions of government and preserve[ ] its control over State coffers.' The State cannot justifiably claim interference with its functions when the act complained of is unauthorized or illegal." ¶ 47 (internal citation omitted).

University Defendants' misconduct involves far more than a mere violation of administrative regulation; it involves multiple violations of Federal anti-discrimination laws associated with sex, race, and national origin.

Although University Defendants initially stated their obligation to investigate Park's concerns, they took no action, ignoring Park's continuous requests. Only after Park contacted Human Resources did they recklessly look into the matter by violating their own policy through failing to implement possible resolutions, and meeting with Stake and Secolsky without responding to Park.

Upon learning that they were responsible for Secolsky's retaliation against Park, they continued to violate University Policy by rejecting Park's valid affiliation with the University and schemed to legitimize that they had no jurisdiction over Park's complaints to cover up their wrongdoings. University Defendants' and Stake's negligence "constitute a fundamental disregard for core provisions" governing discrimination and harassment at the University, "thereby exceeding defendants' authority and violating [Park's] constitutional rights to due process" (Id. at ¶49), which leads to an exception to the doctrine of sovereign immunity.

CONCLUSION

The Seventh Circuit's decisions against Park have departed far "from the accepted and usual course of judicial proceedings" because their decisions were founded on fabricated lies from all parties. Further, sovereign immunity affords no protection to University Defendants who violated "statutory or constitutional law or in excess of his [their] authority" (id, ¶ 45).

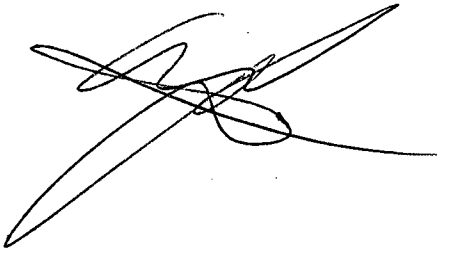
The US courts are not factories that manufacture fabricated lies. The US Courts were created to administer fair and impartial justice. It is our duty to address shortcomings of attorneys, judges, and the lower courts, and it is the Supreme Court's ultimate responsibility to enforce "EQUAL JUSTICE UNDER LAW"[24] so that we, together, may further improve our justice system and build a brighter future.

For the foregoing reasons, pursuant to Sup. Ct R. 44, the petitioner Hye-Young Park respectfully petitions this Court for an order (1) requesting Defendants to respond to the fabricated lies Park has raised and granting rehearing, (2) vacating the Court's March 2, 2019 order denying certiorari, and (3) remanding to the Seventh Circuit for further considerations in light of genuine facts and *Leetaru v. Board of Trustees of the University of Illinois*, 2015 IL 117485.

Respectfully submitted,

Date: March 20, 2020.

Petitioner, Hye-Young Park



[24] https://www.supremecourt.gov/about/about.aspx

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v.

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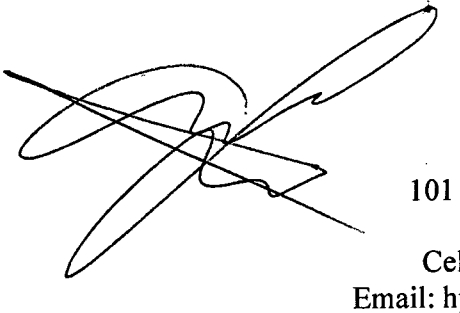
& the Board of Trustees of the University of Illinois—RESPONDENTS

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

CERTIFICATE OF PETITIONER

I hereby certify that this petition for rehearing is presented in good faith and not for delay and is restricted to the grounds specified in Rule 44. Its grounds are limited to intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented in Rule 44.

Petitioner, Hye-Young Park
Date: March 20, 2020.



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