No. 25-1353

IN THE SUPREME COURT OF THE UNITED STATES

Allison Sydney Brown,

Petitioner,

v.

The Washington University, Et al.,

Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

PETITION FOR A WRIT OF CERTIORARI

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I. QUESTION PRESENTED

The Due Process Clause permits federal courts to exercise specific personal jurisdiction over a nonresident defendant when the plaintiff's claims "arise out of or relate to the defendant's contacts with the forum." *Ford Motor Co. v. Montana Eighth Judicial District Court*, 592 U.S. 351 (2021).

The question presented is: Whether the "arise out of or relate to" requirement for specific personal jurisdiction over a non-resident defendant is met when plaintiff's claims arise from or are related to the defendant's virtual activity within the forum?

II. PARTIES TO THE PROCEEDING

ALLISON SYDNEY BROWN ("Brown"), petitioner on review, was the petitioner below and pro-se plaintiff in the trial court.

THE WASHINGTON UNIVERSITY ("WashU")[1], Individually and in their official capacity; ELIZABETH WALSH, Individually and in their official capacity; ADRIENNE DAVIS, Individually and in their official capacity; CARRIE BURNS, Individually and in their official capacity; RUSSELL OSGOOD, Individually and in their official capacity; ROBERT WILD, Individually and in their official capacity; DARRELL HUDSON, Individually and in their official capacity; DEANNA WENDLER-MODDE, Individually and in their official capacity; NICOLE GORE, Individually and in their official capacity; PEGGIE SMITH, Individually and in their official capacity; MARK KAMIMURA-JIMENEZ, Individually and in their official capacity; ELIZABETH KATZ, Individually and in their official capacity; and ANGELA SMITH, Individually and in their official

[1] The Washington University is a research institution with over a billion dollars of research contracts and educational alliances with Maryland citizens and entities, including but not limited to the National Institute of Health in Bethesda, Maryland, Johns Hopkins University in Baltimore, Maryland, NASA Goddard Space Flight Center in Greenbelt, Maryland, and Petitioner in Upper Marlboro, Maryland. Through performance of these research contracts and educational alliances, The Washington University has extensive virtual contacts with the state of Maryland. The virtual contacts with Brown in Maryland were accompanied by Defendants' illegal virtual activity in Maryland that continue to injure Petitioner today and are the basis for her assertion that The Washington University should be subject to specific personal jurisdiction in Maryland.

capacity, were respondents on review, and the defendants in the trial court.

III. CORPORATE DISCLOSURE STATEMENT

Petitioner Allison Sydney Brown is a natural person. No corporate disclosure statement is required under Supreme Court Rule 29.6.

IV. RELATED PROCEEDINGS

Petitioner has filed a largely analogous complaint asserting personal jurisdiction over Defendants in the District Court for the District of Columbia on April 1st, 2026 under case number 1:26-cv-01143-CRC.

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VI. OPINIONS BELOW

The petition for a panel re-hearing and hearing en banc of the United States 4th Circuit Court of Appeals is unpublished at Brown v. Washington University et al., No. 25-1887 and appears at Appendix A to the petition. Judgment was entered on March 31st, 2026.

The opinion of the United States 4th Circuit Court of Appeals is unpublished at Brown v. Washington University et al., No. 25-1887 and appears at Appendix B to the petition. Judgment was entered on February 23rd, 2026.

The opinion of the United States District Court of Maryland at Greenbelt is unpublished and appears at 24-3198-TDC Appendix C to the petition. Judgment was entered on August 4th, 2025.

VII. JURISDICTION

Brown's Combined Petitions for Panel Rehearing and Rehearing En Banc to the 4th Circuit were denied on March 31st, 2026. Jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1), having timely filed this petition for a writ of certiorari within ninety days of the 4th Circuit Court of Appeals' judgment.

VIII. INTRODUCTION

The rise of e-commerce and internet-based businesses has created an urgent and unresolved constitutional question: when, if ever, do a defendant's virtual contacts with a forum state constitute sufficient "minimum contacts" to satisfy the Due Process Clause and confer personal jurisdiction? Courts across the country – including the courts in this case - continue to leave litigants, businesses, and lower courts without workable guidance. Presently, federal and state courts use several different legal doctrines, and emphasize or ignore different facts. This reality results in widely varied outcomes in determining whether a court has personal jurisdiction over a non-resident defendant based on their virtual activities.

This Court's intervention is long overdue. At least twice in this century, the Supreme Court has declined to consider whether a defendant's virtual activities give rise to personal jurisdiction in a particular state. *Ford v. Montana Eighth Judicial District*, 592 U.S. 351 (2021) Note 4 ["Ford"] "And we do not here consider internet transactions, which may raise doctrinal questions of their own. See *Walden v. Fiore*, 571 U.S. 277, 290, n. 9 (2014) ["Walden"] ("[T]his case does not present the very different questions whether and how a defendant's virtual 'presence' and conduct translate into 'contacts' with a particular State")." As a result, courts use a cacophony of different legal concepts, resulting in haphazard, wild west determinations of personal jurisdiction over non-resident defendants due to virtual activity within the forum that are inconsistent and unpredictable. This case squarely presents a question of personal

jurisdiction over a non-resident defendant that has sharply divided the federal courts of appeals and likewise the state courts of last resort. The Supreme Court is the only court that can render decisions that are binding on all United States courts and is uniquely positioned to rectify the presently inconsistent United States court system through issuing decisions that provide lower courts guidelines for evaluating claims based on a non-resident's virtual activity within a forum state, including internet-based claims.

Unlike *Ford* and *Walden*, this case presents an opportunity for the Supreme Court to give United States federal and state courts a comprehensive road map in determining how internet activity should be analyzed to determine whether a non-resident defendant is subject to personal jurisdiction due to their virtual activity in the forum state.

Petitioner respectfully submits that this case presents a myriad of virtual activities that may or may not warrant exercising jurisdiction over a non-resident defendant depending on the Supreme Court's analysis, and is an excellent vehicle for the Supreme Court to use in giving lower courts a blueprint for addressing whether a non-resident defendant is subject to jurisdiction in a particular state through analysis of their virtual activity. In addition, the District Court and 4th Circuit committed clear legal error in determining that 1) virtual contacts only support personal jurisdiction in the state of origination, 2) an entity's contacts with the forum state were irrelevant because they occurred in a different division than the division where plaintiff researched and 3) the District

Court's failure to address the danger facing Brown if forced to litigate claims in Missouri is a clear oversight.

X. STATEMENT

Over the past 30 years, the internet has become completely integrated into daily life in the United States. This prominence is unlikely to dissipate. Similar to real or non-virtual activity, legally actionable transactions occur during internet-based activity that should be governed by a United States court system that allows victims, regardless of resources, to obtain justice in a uniform matter. Presently, this is not the case. When different United States courts analyze whether internet-based activities give rise to jurisdiction over a non-resident defendant, they apply a hodgepodge of different legal cases and doctrines that often lead to the same outcome. These applications result in vast disparities in doctrinal creation and application of the law across both state and district courts across the United States.

Petitioner recognizes that this Court has limited resources to address the application of these different legal doctrines and may overlook them by denying certiorari when the outcome of the case before it is fair. However, when the lower courts decisions are so inconsistent and haphazard that they allow grave injustices to occur, it is imperative that this Court use its power to grant certiorari to not only correct the injustice in the case before it but ensure that future cases do not

end with the same result and that overall, the court system remains fair, impartial and just.

XI. REASONS FOR GRANTING THE PETITION

A. Intentional Virtual Actions Committed by Non-Resident Defendants in a Forum State Should Subject Them to Personal Jurisdiction

In *Rosenthal v. Bloomingdales.com LLC*, ("*Rosenthal*") 101 F.4th 90 (1st Cir. 2024), the 1st Circuit found non-resident Defendant Bloomingdales' internet activities were insufficient to confer Massachusetts jurisdiction over Bloomingdales, an Ohio Corporation with a principal place of business in New York. Rosenthal alleged that Bloomingdales unlawfully intercepted and used information about his activity on Defendants' website by embedding JavaScript computer code on its website that intercepted, recorded, and mapped his electronic communications with the website. The 1st Circuit openly admitted that they lacked confidence in their determination stating "perhaps the Supreme Court will step in with more guidance (there are plenty of test cases making their way through the system) . . . But for now our hands are tied." This language is supportive of Petitioner's assertion that this issue is ripe for adjudication, and this Court should provide lower courts more guidance in determining whether a non-resident defendant is subject to jurisdiction in a forum state based on the defendant's virtual activities within the forum state.

In contrast, in a 9th Circuit case, *Briskin v. Shopify, Inc.,* 135 F.4th 739 (9th Cir. 2025), an en

banc panel found non-resident Defendant Shopify subject to specific personal jurisdiction in California because Shopify's installed cookies tracked Briskin's location and collected data regarding Briskin's shopping activity without his consent. The 9th Circuit found that these allegedly tortious actions deliberately targeted Briskin in California. More specifically, "Shopify sends executable JavaScript code to consumers' computers or mobile devices, which then load and execute the code to display the payment form . . . enabling it to track Briskin's behavior across Shopify's vast merchant network"). *Id.* at 13.

Thus, a defendant's use of JavaScript Code to obtain customer data does not give rise personal jurisdiction in the 1st Circuit but does give rise to personal jurisdiction in the 9th Circuit. While this virtual activity is legally actionable, Brown respectfully submits that neither defendant is committing malicious behavior against the plaintiff. Instead, Brown believes that the defendants were primarily seeking financial gain through unlawful collection of plaintiff's data without plaintiff's consent.

In contrast, Petitioner respectfully submits that Respondent's virtual actions against Petitioner while Petitioner was in Maryland were intentional, diabolical, malicious, and far more egregious than the Defendants' surreptitious gathering of personal data through JavaScript Code in *Briskin.*[2]

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[2] WashU's malicious acts against Brown are documented extensively in the district court and 4th Circuit filings.

Respondents made contact with the forum state of Maryland through the following actions, including but not limited to: 1) labeling Petitioner a "threat" to the WashU community and the Maryland Board of Law Examiners, 2) constructively evicting Petitioner from her apartment under the threat of arrest by a violent WashU private police force (which is accountable to no one[3]) that patrolled not only the campus but Brown's apartment, 3) advertising online that Respondent Mark Kamimura-Jimenez handled discrimination complaints against Respondent WashU, resulting in Petitioner's mother, a Maryland resident, urging Petitioner to contact him regarding Respondent WashU's destructive labeling of Petitioner as a threat to WashU, when Respondent Kamimura-Jimenez in fact did nothing, 4) forcing Petitioner to take WashU classes online for over 6 months while in Maryland, 5) failing to provide Petitioner over 30% of the class tapes for those online classes while Brown was in Maryland, 6) forcing Petitioner to undergo a multi-day several hour kangaroo court like online hearing while Petitioner was in Maryland after Petitioner refused to sign a non-disclosure agreement that included language precluding not only Petitioner, but Petitioner's Maryland citizen family members, from bringing any legal action against WashU due to their despicable behavior against Petitioner, 7) interfering with Petitioner's internships with Maryland and Washington D.C. entities because

[3] The 8th Circuit has not provided any remedy to WashU police force overreach through the use of electronic "wanteds." *See Furlow v. Belmar*, 52 F. 4th 393 (8th Circuit 2022).

Petitioner was under investigation and not in good standing while Petitioner was living in Maryland, 8) manhandling Petitioner to finish Petitioner's degree at Georgetown while living in Maryland, 9) rescinding Petitioner's scholarship while Petitioner was living in Maryland and attending Georgetown, and 10) sending Petitioner to collections for owing Respondent WashU over $40,000 in Maryland. As a result of Respondent WashU's heinous actions, Petitioner was admitted on May 12, 2026 to the Pennsylvania Bar despite having passed the UBE in July 2025 in 41 states, unable to find employment due to Respondent WashU's defamatory transmissions, and currently receives Maryland SNAP benefits.

As stated previously, Respondent WashU has also extensive virtual contacts with Maryland through its research activities with several Maryland entities, including Petitioner. Thus, Petitioner is not seeking universal personal jurisdiction over Respondent WashU, but is seeking personal jurisdiction over Respondents WashU et al due to a combination of WashU's virtual contacts with Petitioner and other Maryland entities in Maryland.

Petitioner respectfully submits that if a court can find a Defendant subject to personal jurisdiction for using JavaScript Code to obtain personal data without a customer's consent, it should be able to find Respondents WashU et al subject to personal jurisdiction for committing the egregious virtual acts listed above, all intentionally directed towards the state of Maryland and Petitioner in Maryland.

B. Granting Certiorari Would Establish Precedent Regarding Whether Virtual Activity Must Be Directed to Forum State to Confer Jurisdiction Over a Non-Resident Defendant

In Blessing v. Chandrasekhar, 988 F.3d 889 (6th Cir. 2021), the 6th Circuit Court of Appeals case held that out-of-state Twitter users who post allegedly defamatory, non-commercial content are not subject to personal jurisdiction in Kentucky under its long-arm statute.

Yet two years later, the 6th Circuit found jurisdiction over a non-resident defendant with similar internet activities. In *Johnson v. Griffin*, 85 F.4th 429 (6th Cir. 2023), the Sixth Circuit held that personal jurisdiction over the non-resident Defendant existed over the tweet-based tort claim. The court found that when a defendant's online actions (such as tweeting) specifically target a resident in the forum state and cause foreseeable injury, the court can exercise jurisdiction. The 6th Circuit said that the latter case was a basis for personal jurisdiction because the defamatory tweets were directed to the forum state, while the former did not establish jurisdiction because the defamatory virtual tweet was equally available inside and outside of the forum state, or "generalized or passive."

In contrast, the 9th Circuit in *Briskin* found personal jurisdiction over a non-resident defendant for using JavaScript on *all* website users, including those in California. In *Briskin*, an en banc panel found non-resident Defendant, Shopify, subject to specific personal jurisdiction in California because Shopify's allegedly tortious

actions deliberately targeted Briskin in California even though defendant's online presence was generalized or passive. This rejection of differential targeting represents a significant doctrinal shift. Historically, courts had been reluctant to find personal jurisdiction where a defendant's online presence was generalized or passive. *Briskin* does away with that standard, and holds that deliberate operation of an interactive platform accessible in a forum, combined with the collection of sensitive user information, satisfied the minimum contacts to obtain jurisdiction over the non-resident defendant, Shopify.

This Court should use its unique powers to settle the question for all courts as to whether internet activity must be directed to the forum state to secure personal jurisdiction over the non-resident defendant, or whether generalized or passive virtual contact is sufficient to exercise personal jurisdiction over the non-resident defendant.

Regardless, because Respondent WashU's defamation of Petitioner was only one of the numerous virtual contacts WashU made in Maryland, a determination that defamation alone is insufficient to warrant personal jurisdiction because it was generalized or passive is not fatal to Petitioner's claim that Respondents WashU et al should be subject to personal jurisdiction due to Respondents' overall virtual contacts with Maryland.

1. Granting Certiorari Would Establish Precedent Regarding Whether Virtual Contacts Occurring During Settlement Negotiations Confer Jurisdiction Over A Non-Resident Defendant

In *Trimble v. PerDiem Co.,* 997 F.3d 1147 (Fed. Cir. 2021) ("*Trimble*"), the Federal Circuit found that non-resident Defendant Per Diem Co.'s attempted settlement communications with Trimble via letter, email or telephone at least twenty-two times was sufficient to establish personal jurisdiction, reversing a lower court's finding of no personal jurisdiction.

In contrast, both the District Court of Maryland and the 4th Circuit found no personal jurisdiction over WashU despite far more extensive contacts than the 22 settlement communications between Trimble and PerDiem, as listed in Section A of this brief. The settlement communications in *Trimble* are equivalent to only one of WashU's virtual contacts made to Petitioner (Item 6 of the Section A listing.)

Specifically, the virtual contacts resulting from the unsuccessful negotiation of an agreement containing restrictions on multiple Maryland residents' ability to bring suit against WashU for their deplorable actions against Petitioner (who was constructively evicted from her apartment in Missouri by Respondents) was not sufficient to grant personal jurisdiction over Defendants. The District Court and 4th Circuit Court of Appeals also refused to grant jurisdiction over Respondents even though Defendants subjected Petitioner in Maryland to an online kangaroo court hearing

conducted over several hours and multiple days from November 2022 to May 2023.

2. Granting Certiorari Would Establish Precedent Regarding Whether Forum State Has Personal Jurisdiction Over a Non-Resident Defendant Only Selling Physical Products Over the Internet and Delivering the Same to Forum State Residents

As this Court knows, the 9th Circuit exercised personal jurisdiction over a non-resident defendant whose only conduct was selling a physical product over the internet and delivering the physical product to citizens of the forum state. *Herbal Brands, Inc. v. Photoplaza, Inc.*, 72 F.4th 1085 (9th Cir. 2023), ("*Herbal Brands*"). That is, the 9th Circuit found that a non-resident defendant who sells a physical product via an interactive website in a particular forum may be subject to personal jurisdiction in that forum, even absent any additional contacts.

Interestingly, the 9th Circuit recognized "that other circuits have adopted a range of approaches in response to similar questions" citing 2nd and 7th Circuit cases supporting personal jurisdiction over a non-resident defendant over internet activity and 5th and 8th Circuit cases finding no jurisdiction over a non-resident defendant engaging in similar activity. *Id.* at 19. The 9th Circuit explicitly stated that it was not trying to reconcile these different approaches. Petitioner respectfully submits that this Court did not try to reconcile these different approaches either, and denied certiorari.

Additionally, the Southern District of New York found personal jurisdiction over a foreign online retailer of counterfeit dolls even thought there was no completed sale within the state. In *American Girl LLC v. Zembrka,* No. 21-cv-02372 (S.D.N.Y. April 28, 2021), Defendants cancelled all orders submitted by NY residents and refunded their money so no items were ever shipped to NY. Yet, because the Southern District of New York found an online order form accessible by New York residents, the Southern District of New York found this sufficient to establish jurisdiction.

Petitioner prays that this Court can recognize the extreme unfairness in allowing a plaintiff to obtain personal jurisdiction over a non-resident defendant in the plaintiff's forum state due to the sale of a product over the internet and delivery of the same product in the forum state, yet denying personal jurisdiction over Respondent WashU's commitment of multiple intentional and heinous virtual acts listed in Section A in Maryland in an attempt to destroy Petitioner's legal career.

Furthermore, Petitioner respectfully submits that if a court can find personal jurisdiction over a non-resident defendant based on an online order form being accessible to residents of the forum state, Respondents WashU et al should be subject to personal jurisdiction in Maryland in light of all of the virtual activity it conducts in Maryland with Petitioner and other Maryland entities.

In *Herbal Brands,* the 9th Circuit applied *Ford* and found that Plaintiff's Claims "clearly arise out of and relate to the defendant's conduct of selling those same products to Arizona residents." *Id.* at

1105. A lack of Supreme Court cohesive guidance regarding virtual activity and personal jurisdiction allowed the Maryland District Court and 4th Circuit to refuse to exercise jurisdiction over Respondents under *Ford*.

C. Applying *Ford* to this Case Would Establish a Logical Beginning to this Court's Jurisprudence Regarding Personal Jurisdiction Over a Non-Resident Defendant Due to Their Virtual Activity in the Forum State

Ford is this Court's most recent precedential opinion on specific personal jurisdiction over a non-resident defendant relevant to this case, and gave lower courts an extensive footprint to follow in determining personal jurisdiction. Gorsuch wrote for the 8-0 opinion in Ford, "Lower court judges may sometimes disagree with this Court's decision, but they are never free to defy them." *Id.*

Yet Brown respectfully submits that this is exactly what the District Court of Maryland and the 4th Circuit did in their refusal to apply *Ford* and subsequent finding that the Maryland District Court had no personal jurisdiction over Respondents WashU et al.

The facts in *Ford* and the facts in this case are highly analogous.[4] Both Ford and WashU are large legal entities. Ford produces cars and WashU produces education and research. Plaintiffs sued Ford because Ford's car had a defect that resulted

[4] Brown applied *Ford* extensively in both the district court and 4th Circuit briefs. Neither WashU, the District Court, nor the 4th Circuit addressed Brown's application of *Ford* in any briefs or opinions.

in injury and death, a car malfunction. Brown sued WashU because she was retaliated against for complaining about discrimination, a legally protected activity, while pursuing education and research at Wash U, an education and research malfunction. Plaintiffs obtained specific jurisdiction over Ford even though plaintiff's car did not arise from Ford's car related activities within the forum state. The fact that plaintiff's car was a Ford car made plaintiff's claim related to Ford's activities within the forum state. A Ford car is a Ford car. Similarly, Brown should be able to obtain specific jurisdiction over WashU even though Brown's initial education and research did not arise from WashU's education and research activities within Maryland. The fact that Brown's research was conducted through a $1000 grant from WashU made it related to WashU's research within Maryland. Thus, WashU research is WashU research.

If the Supreme Court in *Ford* used the same analysis that the District Court did below, Ford would not have been subject to personal jurisdiction in Montana and Minnesota because plaintiffs' claims did not arise from Ford's contacts.

XII. THE DECISION BELOW IS WRONG[5]

A. The District Court's Determination that a Non-Resident Defendant's Virtual Contacts Only Support Personal Jurisdiction in the State Where the Virtual Contact Originated Is Clear Error

The District Court erred in finding that the "vast majority of the conduct by Defendant underlying Petitioner's claims occurred in Missouri" and that "regardless of whether Maryland was the focal point of the harm, however, Petitioner has not established that Defendants either engaged in tortious conduct in Maryland or that they expressly aimed their conduct as required to establish personal jurisdiction based on the effects test." (Memo. Op. at 15, 26.) The District Court found that the negotiations, the SCB hearing, the class tapes, the debt notices and all of the emails related thereto did not confer jurisdiction on Respondent WashU because they originated in Missouri. If Courts applied this standard in determining whether a non-resident Defendant is subject to jurisdiction due to its virtual activity in the forum state, a court would never find jurisdiction over a non-resident defendant based on their virtual activity in a forum state. All virtual activity by a non-resident defendant originates outside of the forum state. It is so by definition. Therefore, the District Court erred in finding there could be no personal

[5] Petitioner has documented extensively the District Courts errors in her 4th Circuit filings and received a one sentence denial of relief from both a three-judge panel and a one sentence denying an en banc petition from the 4th Circuit.

jurisdiction over Respondent WashU's virtual activity in Maryland.

B. The District Court's Determination that Only a Subset of Respondent WashU's Maryland Virtual Contacts Were Relevant in Determining Personal Jurisdiction Is Clear Error

WashU is the only corporate non-resident Defendant in this case. Thus, all of WashU's virtual contacts in Maryland are relevant to the jurisdictional analysis under *Ford* and *UMG Recordings Inc. v. Kurbanov*, 963 F.3d 344, 352 (4th Cir. 2020). The District Court found that WashU's contacts with Maryland entities "cannot support a finding of personal jurisdiction in this case because Brown has not provided any basis to establish . . . that her claims arose out of these general contacts . . . none of these contacts have anything [to] do with WashU Law School generally or any program in which she participated specifically." (Memo. Op. at 17.) **There is no mention of the "related to" language of Ford in the District Court opinion.** If the Supreme Court had applied the same analysis as the District Court, Ford would not have been subject to personal jurisdiction in Montana and Minnesota because the District Court required that plaintiff's claims arise from Ford's contacts to obtain personal jurisdiction over Ford. Furthermore, neither WashU law school or any program that Petitioner participated in are legal entities, therefore, they should not be recognized by any Court. See *Martinez v. N. Arizona Univ.*, 553 F. Supp. 3d 908, 919 (D. N. M. 2021). Thus, the District Court's determination that WashU's extensive virtual

contacts with several Maryland entities was irrelevant to whether WashU was subject to personal jurisdiction in Maryland is clear legal error.

C. The District Court Should Have Addressed the Danger Facing Petitioner if Forced to Litigate Claims in Missouri

There is extensive documentation in both Petitioner's District Court and the 4th Circuit filings regarding the danger that Petitioner would face if she is forced to litigate her claims in Missouri. At least two different news articles have been written on the unconstitutional overreach of Respondent WashU's police force through its use of "Wanteds", which were provided to both courts and ignored. Furthermore, the 8th Circuit has not provided any remedy to Respondent WashU's police force overreach through the use of electronic "wanteds." *See Furlow v. Belmar,* 52 F.4th 393 (8th Circuit 2022).

Additionally, the 8th Circuit has adopted an "educational malpractice" doctrine that has courts refrain "from recognizing educational malpractice claims, whether in tort or contract on the premise that universities must be allowed the flexibility to manage themselves and correct their own mistakes." *Gillis v. Principia Corp.*, 832 F. 3d 865, 875 (8th Cir. 2016) at 9. Respondents gleefully delineated to the District Court all of the deplorable actions taken by universities and their professors that were not found to be actionable under this doctrine in its filings before the District Court. (Case 8:24-cv-03198-TDC, ECF 33-1, Defendant's Memorandum in Support of Motion to

Dismiss, Page 24) Thus, it is abundantly clear that Respondent WashU is not able to correct its own mistakes.

D. Respondent WashU will not Face an Unusual Burden in Defending the Matter in Maryland

As stated in Petitioner's District court filings, Petitioner does not anticipate that Defendants will face a great burden defending themselves in Maryland. Petitioner plans to rely primarily on Class recordings, hearing recordings, emails and electronic documents to support her claims. Petitioner does not expect to do any depositions. Rather, Petitioner plans to have the recordings and documents of Respondents' deplorable behavior speak for themselves. See *NBC Properties, Inc. v. Hanwjh*, 46 F4th 614 (7th Cir. 2022) (Defendant did not set forth an unusual burden in defending the matter in forum state.)

XIII. CONCLUSION

For all the foregoing reasons, Petitioner respectfully requests that this Court grant certiorari.

Respectfully submitted,

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