STATE OF MICHIGAN IN THE 22ND CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

THE BOARD OF REGENTS OF THE UNIVERSITY OF MICHIGAN, et al,

Case No. 23-001419-CB

Plaintiffs,

Hon. Timothy P. Connors

v.

THE BIG TEN CONFERENCE, INC, et al,

Defendants.

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APPLICATION FOR LEAVE TO FILE AMICUS BRIEF FOR RYAN MCCARL ON BEHALF OF CONCERNED ALUMNI

Amicus Ryan McCarl, an attorney at the California-based litigation firm Rushing McCarl LLP, is a University of Michigan alum (M.A. 2010) and lifelong fan of the football program. McCarl was born in Ann Arbor the week legendary coach Bo Schembechler and quarterback Jim Harbaugh led Michigan to a 27-17 victory over Ohio State. McCarl's father Kip was a student-trainer for the football team, so McCarl was often brought to games in a backpack and continued attending games throughout his childhood.

McCarl volunteered to write an amicus brief representing the perspective of Michigan alumni who love the football program, and the response was overwhelming. Around 1,700 degree-earning Michigan alumni (ranging from the Class of 1959 to the Class of 2023) entrusted Rushing McCarl LLP to share their perspective with the Court.¹ Given the time constraints of the upcoming hearing on the university's motion for preliminary relief, not all the signatories could be verified in time to be included on the brief. The signatories included many former athletes, season ticket holders, donors, fellow attorneys, and other members of the alumni community across the world.

These alumni were outraged at the Big Ten's failure to provide Michigan due process before suspending Head Coach Jim Harbaugh, who restored Michigan Football to its historic greatness. Coach Harbaugh ought to be on the field as Team 144 earns the 1,000th program victory and defeats Ohio State en route to a third straight Big Ten title.

¹ Alumni who signed up through our online form were required to attest that they are degree-receiving alumni, sign in through Google, and provide their full names, email addresses, degrees, and class years, with the option to include other information to help with verification. 1,163 signatories were verified and 527 spot-checked by a contact at the University of Michigan Alumni Association, who did not release any alumni information but did help us identify mistaken entries (of which there were very few). Another 25 signatories could not be verified in time for filing and have been omitted from the signature page.

Michigan alumni are deeply invested in the outcome of the Plaintiffs' motion for interim relief. The alumni's decision to attend the University of Michigan was influenced heavily by its distinguished reputation, and that reputation is now at risk. The commissioner's unfair actions, which imply misconduct by the university and Coach Harbaugh despite no such finding, cast a shadow not only over the institution but also over all individuals associated with it, past and present, questioning their commitment to integrity and adherence to rules.

University of Michigan alumni have a strong interest in preventing their institution from being dragged through the mud. The Big Ten's impulsive mid-season punishment reinforces unsupported narratives of institutional cheating by meting out punishment for a supposed "scheme" before the NCAA has finished its investigation or any coaches have been shown to know of any wrongdoing. The "scheme" so far appears to consist of one low-level employee's independent actions.

The community also has an interest in allowing the next two games to be played at the highest level of competition² and giving the University of Michigan football team a fair shot at the Big Ten title game and National Championship. In particular, millions of fans want the November 25 game against Ohio State — the greatest rivalry in college sports³ — to be played on a level field between two great teams with two great head coaches.

Several alumni who co-signed this brief noted that they are season-ticket holders (one had held them for over 30 years). One noted:

As an out of state season ticket holder who purchased tickets for and attends each home football game, I expect that the entire coaching staff is allowed to lead the team

² "The Game, as a whole, is less compelling because the entire country has now been robbed of enjoying the sport's best rivalry at full throttle."Ari Wasserman, *The Big Ten's Punishment of Michigan's Jim Harbaugh Was Sloppy, Rushed and Pleases Nobody*, The Athletic (Nov. 11, 2023).

³ Robin Wright, *Michigan and Ohio State, America's Greatest College Sports Rivalry, Is About a Lot More Than Sports*, The New Yorker (Nov. 21, 2018).

on game days . . . Coach Harbaugh's absence reduces the value of my purchase and diminishes the probability of Michigan winning its football games.

That alum's experience provides one glimpse into how the Big Ten's suspension of Coach Harbaugh affects people throughout the community. Denying Plaintiff's motion would allow the commissioner's actions to inflict irreparable harm on the university's reputation and growth. That harm directly affects the alumni who helped make the university what it is today, as shown by their participation in this brief.

Respectfully submitted,

Dated: November 14, 2023

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STATE OF MICHIGAN CIRCUIT COURT FOR THE 22ND JUDICIAL CIRCUIT WASHTENAW COUNTY

THE BOARD OF REGENTS OF THE UNIVERSITY OF MICHIGAN; JAMES J. HARBAUGH,

Petitioners,

v.

THE BIG TEN CONFERENCE, INC.; TONY PETITTI,

Defendants

Case No.: 23-001419-CB

Hon. Timothy P. Connors

AMICUS BRIEF OF RYAN MCCARL ON BEHALF OF CONCERNED ALUMNI

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AMICUS BRIEF OF RYAN MCCARL ON BEHALF OF CONCERNED ALUMNI

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INTRODUCTION¹

For many University of Michigan alumni, love for the university is intertwined with love for its athletic programs. Michigan sports — and, above all, Michigan Football — serve as a cultural touchstone connecting the university's vast alumni network across continents and generations. That is why roughly 1,700 alumni were moved to sign this brief.² An institution of which alumni are justly proud, and to which many of their happiest memories are linked, is being unfairly smeared as lacking integrity and arbitrarily punished at the demand of rival schools for those schools' benefit.

¹ This brief is a grassroots, fan-driven effort spearheaded by attorney Ryan McCarl (MA 2010) and supported by the roughly 1,700 University of Michigan alumni ranging from the Class of 1959 to the Class of 2023 — listed in the Additional Signatories section that follows the brief. Pursuant to MCR 7.212(H)(3), no party or attorney for any party solicited, authored, or approved any portion of the brief; nor has any party consented to its filing. The brief was drafted pro bono by McCarl through his litigation firm Rushing McCarl LLP with the support of local counsel Carlson Gaskey and Olds, and no party or attorney for any party made a monetary contribution intended to fund the preparation or submission of the brief. No individuals other than the amicus and its local counsel made any monetary contributions to the brief. This brief was not solicited, reviewed, or endorsed by any party or any party's attorneys.

² Alumni who signed up through our online form were required to attest that they are degree-receiving alumni, sign in through Google, and provide their full names, email addresses, degrees, and class years, with the option to include other information to help with verification. 1,163 signatories were verified and 525 spot-checked by a contact at the University of Michigan Alumni Association, who did not provide any alumni information but did help us identify mistaken entries (of which there were very few). Another 25 signatories could not be verified in time for filing and have been omitted from the signature page.

The Big Ten's mid-season suspension of Head Coach Jim Harbaugh effectively branded the Michigan Football program and its leader as having run a cheating scheme even though no evidence supports that conclusion and the NCAA has not completed its investigation. Casual fans may hear commentators talking about "sign-stealing," see that Coach Harbaugh isn't on the sideline, and incorrectly assume that after appropriate processes were followed and a thorough investigation completed, Coach Harbaugh was found to be culpable. They are much less likely to know that in the letter announcing Coach Harbaugh's suspension, the Big Ten admitted that it had "not yet received any information indicating that Head Football Coach Harbaugh was aware" of any wrongdoing.³

With two games remaining in the regular season and Michigan's path to a national championship on the line, interim relief is needed to prevent immeasurable harm not only to Coach Harbaugh and the student-athletes he leads, but to the entire community of people connected with the University of Michigan.

I. The Big Ten caved to rival schools' demands for immediate punishment of Michigan before an ongoing NCAA investigation was complete.

In October 2023, a third party alerted the NCAA that a Michigan Football staffer, analyst Connor Stalions, had allegedly violated an NCAA rule against in-person scouting by buying tickets for others to attend rivals' games to gather information to decipher playcalling signals.

³ See Nov. 10, 2023 letter from Big Ten Commissioner Tony Petitti to University of Michigan Athletic Director Warde Manuel, p. 2

Deciphering other teams' signals is a legal and ubiquitous practice in football, and teams routinely change their own signals with the expectation that rivals are trying to decipher them.⁴ But Stalions' actions were portrayed in early media coverage as constituting a "sign-stealing scheme."⁵ The label stuck and was ultimately adopted by the Big Ten in its explanation of why it was suspending Coach Harbaugh.⁶

The NCAA began to investigate potential rule violations relating to Stalions' conduct, and that investigation is ongoing.⁷ Stalions refused to cooperate with any investigations, so he was suspended by the university and later resigned.⁸ He then said through his attorney that he had acted alone and that no coaches knew of his alleged conduct.⁹ Neither the NCAA nor the Big Ten has produced any evidence disputing that statement.

Other reporting supported the inference that Stalions didn't always keep Michigan's coaches or players abreast of his plans. In October, Sports Illustrated

⁴ See Alex Scarborough & Adam Rittenberg, *What College Football Coaches Are* Saying About Sign Stealing, ESPN (Oct. 24, 2023).

⁵ Ralph D. Russo, *Coach-to-Player Technology Could Have Prevented Sign-Stealing Scandal Hitting College Football*, AP (Oct. 26, 2023).

⁶ See supra n.3 (Nov. 10, 2023 letter from Petitti to Manuel), p. 2 (referring to an "impermissible sign-stealing scheme"). The letter uses the word "scheme" 43 times and asserts that "the existence of the impermissible scheme is proven." *Id.*

⁷ See Nicole Auerbach & Chris Vannini, NCAA Investigating Whether Ex-Michigan Staff Connor Stalions Was on Central Michigan Sideline, The Athletic (Nov. 6, 2023).

⁸ Ralph D. Russo, *Connor Stalions, The Michigan Employee at the Center of the NCAA Sign-stealing Investigation, Quits, AP (Nov. 3, 2023 9:41 p.m.).*

⁹ Auerbach, Nicole, et al., *Michigan's Connor Stalions Resigns, Says Neither Harbaugh Nor Team 'Were Aware of Improper Conduct,'* The Athletic (Nov. 3, 2023).

reported that it had received text messages in which Stalions revealed that he was part of a small group of people — two of whom he said were at low-level positions on different college football staffs — who were crafting a long-term plan to run the Michigan football program.¹⁰

The Big Ten admittedly had no evidence that Coach Harbaugh knew about the "sign-stealing scheme" but suspended him anyway, characterizing this as a punishment for the whole program but not Coach Harbaugh personally.¹¹ Commissioner Petitti explained that "the Head Coach embodies the University for purposes of its football program"¹² (whatever that means).

The Big Ten learned of the allegations involving Stalions from the NCAA.¹³ The NCAA's investigation gave rise to what Rule 32 of the Big Ten Handbook calls an NCAA-initiated case;¹⁴ in such a case, the Conference must wait for the NCAA investigation to be completed and penalties to be assessed before the Conference decides whether to levy additional penalties.¹⁵

That timeline didn't suit the schools vying with Michigan for a Big Ten title; they demanded, in two closed-door meetings from which Michigan was partially

¹⁰ See Richard Johnson, Michigan's Connor Stalions Texted That He "Stole Opponent Signals" From TV—and Had a Vision for the Wolverines, Sports Illustrated (Oct. 25, 2023).

See supra n.3 (Nov. 10 letter from Petitti to Manuel), p. 2 ("This is not a sanction of Coach Harbaugh. It is a sanction against the University that, under the extraordinary circumstances presented by this offensive conduct, best fits the violation").

¹² Id.

¹³ See supra n.3 (Nov. 10 letter from Petitti to Manuel), p. 3.

¹⁴ See Rule 32 of the Big Ten Handbook (Compl. Ex. C).

¹⁵ See Rule 32.2.2.C.2 of the Big Ten Handbook (Compl. Ex. C).

excluded, that Petitti take immediate action.¹⁶ Their demands, however phrased, in practice asked Petitti to immediately interfere with Michigan's 2023 season for these rivals' benefit rather than awaiting the results of the NCAA investigation.

The Conference obliged these requests. Invoking a "Sportsmanship Policy" that allows for summary punishment for "[a]ctions that are offensive to the integrity of the competition, actions that offend civility, and actions of disrespect," the Conference told Michigan that Rule 32's procedures for NCAA-initiated cases need not be followed in this instance. This was because Stalions' alleged conduct threatened "the integrity of the competition," supposedly bringing it within the ambit of the Sportsmanship Policy and allowing the Commissioner to bypass Rule 32's "slower-moving" procedures in favor of summary punishment.¹⁷ The chosen punishment was an immediate suspension of Coach Harbaugh for the final games of the 2023 season, including an anticipated top-five matchup between Michigan and Ohio State.

See Pete Thamel, Sources: Big Ten Coaches Urge Action vs. Michigan in Call, ESPN (Nov. 1, 2023) (reporting that in an hourlong portion of a call with Big Ten football coaches after Coach Harbaugh had hung up to "allow the conference's coaches to speak freely about the NCAA's investigation into Michigan," a "chorus of voices encouraged Petitti to take action against Michigan in a call that was described as both intense and emotional"); Pete Thamel, Sources: ADs Offer Support But Tell Commish Big Ten Must "Step Up," ESPN (Nov. 2, 2023) (reporting that in a call with Big Ten athletic directors other than the University of Michigan's Warde Manuel, the rival ADs sent "a clear message" that "the conference needs to step up").

¹⁷ See supra n.3 (Nov. 10 letter from Petitti to Manuel), p. 9.

The Conference claimed that this punishment "preserves the ability of the University's football student-athletes to continue competing,"¹⁸ though without the benefit of one of the most sought-after coaches in sports. If the Big Ten gets its way, Michigan's last three conference opponents in 2023 — Penn State, Maryland, and Ohio State — will have been spared the need to play Michigan at even strength. Instead, they will get to play a version of Michigan that is missing Coach Harbaugh. Unless this Court grants Plaintiffs' motion, Coach Harbaugh will be watching the games from home as his undefeated team fights for the University's 1,000th program win and a shot at the Big Ten championship and College Football Playoff. These once-in-a-lifetime games will not be the same without him on the sidelines.

II. If not stayed, the Big Ten's suspension of Coach Harbaugh will do irreparable damage to reputational and economic interests important to the entire University of Michigan community, including alumni.

The Big Ten's mid-season suspension of Coach Harbaugh threatens to derail Michigan Team 144's undefeated season and pursuit of a Big Ten title and national championship, but saying so does not begin to describe the effect these actions will have. Millions of people care about these games; last year, for example, 17 million people watched Michigan's contest against Ohio State.¹⁹ Marquee games with championship implications affect variables including alumni athletic donations, the

¹⁸ *See id.* at p. 2.

¹⁹ The 2022 game between Michigan and Ohio State was the most-watched regularseason college game in the FOX network history. Michael McCarthy, *Michigan-Ohio State Draws Biggest Rating in a Decade*, Front Office Sports (Nov. 28, 2022, 9:23 a.m.).

university's applicant pool, athletes' draft stock, and football recruiting and revenue.²⁰

Michigan football has immense financial ramifications for the University and local economy. In 2022, the University of Michigan earned \$47,502,989 solely from football ticket sales.²¹ A study from 2015 found that home football games brought an economic impact of \$81.8 million to the Ann Arbor area, where the university is located.²² Local businesses depend on football games to keep their doors open.

This season is especially critical because Michigan has a realistic shot at winning its first national championship since 1997. But the financial implications pale in comparison to the harm that players and fans will face by having their chances at a once-in-a-lifetime National Championship title unfairly obstructed by the Big Ten's suspension of Coach Harbaugh.

See Elise Young, The Gridiron Payoff?, Inside Higher Ed (July 02, 2012); Kevin McGuire, Does Winning a National Title Really Give You a Boost in Recruiting? (Yes), NBC Sports (Jan. 27, 2015, 7:35 a.m.); Chris Smith, The Money on the Line in the College Football National Championship Game, Forbes (Jan. 9, 2017, 10:39 a.m. EST) ("Title-winning teams move more merchandise, have greater demand for game tickets and receive much more money in the way of alumni contributions.... [W]inning teams experienced an average 18% surge in income." Players are greatly impacted as well; "there may be no better opportunity for a prospective pro to boost ... his draft stock.").

²¹ Tony Garcia, University of Michigan Athletic Department: \$17.1 Million Surplus for 2022 Fiscal Year, Detroit Free Press (Jan. 27, 2023, 4:43 p.m.).

²² Brendan F. Quinn, *What Are Michigan Football Weekends Worth to Ann Arbor Tourism? Examining the Economic Impact*, MLive (Oct. 9, 2015, 10:00 a.m.).

A. The Big Ten's impulsive suspension of Coach Harbaugh with three games to go in the regular season was designed to evade judicial scrutiny of the Conference's actions and create an unlevel playing field both in court and on the gridiron.

The Big Ten's November 10 suspension of Coach Harbaugh occurred while he was on a plane to College Station for the next day's game against Penn State. Though the Big Ten had reportedly been considering a suspension for more than a week, Michigan signaled that it would challenge any suspension in court. The Big Ten therefore chose to wait until 3:30 p.m. on a Friday afternoon before a holiday weekend to announce its suspension of Coach Harbaugh.²³ Michigan learned less than 24 hours before game time that it would have to play conference rival Penn State (then ranked #9 in the nation) on an uneven playing field, with Michigan deprived of the leadership and strategic acumen of its head coach.

This timing was calculated to evade judicial scrutiny of the Big Ten's actions by virtually eliminating the possibility that Michigan could seek to enjoin the suspension in time to have Coach Harbaugh on the sidelines for the following morning's Penn State game.

The same is true of the suspension as a whole. Rather than allowing the NCAA investigation to be completed, the evidence to come in, and Michigan to have its say, the Big Ten — by penalizing Michigan in the final weeks of the season — has

²³ The Big Ten announced its suspension of Coach Harbaugh at 3:31 p.m. on Friday, November 10th, 2023. *Big Ten Conference Announces Violation of Sportsmanship Policy by University of Michigan Football Program*, B1G (Nov. 10, 3:31 p.m.).

deprived Michigan of these procedures while forcing Michigan to overcome a difficult procedural standard to obtain interim judicial relief.

The preliminary injunction standard calls for "a realistic appraisal of all the traditional factors weighed by a court of equity," and one of these factors is the principle that parties should not be allowed to benefit from their own wrongs.²⁴

B. Allowing the Big Ten to prevent Michigan Team 144²⁵ from finishing its undefeated season at full strength would irreparably harm both the entire University of Michigan community.

Harm from the denial of a preliminary injunction is irreparable if it is not fully compensable by monetary damages.²⁶ Depriving the University of Michigan football team of their head coach during crucial games puts the team at a severe disadvantage. Coach Harbaugh plays a critical role in the University of Michigan football program. Under the former NFL coach's leadership, Michigan has held a 74-25 record.²⁷ Coach Harbaugh is one of the best college football coaches in the nation, if his salary is any indication; he is the twelfth highest-paid college football coach and the fourth highest-paid in the Big Ten.²⁸

²⁴ *Roth v. Bank of the Commonwealth*, 583 F.2d 527, 538 (6th Cir. 1978).

²⁵ Michigan's practice of giving each year's team its own number reinforces that each year's team is unique and that each game is unique, but all the athletes and coaches are united in preserving the university's traditions.

²⁶ See Certified Restoration Dry Cleaning Network, L.L.C. v. Tenke Corp., 511 F.3d 535, 550 (6th Cir. 2007) (finding that unfair competition is likely to cause irreparable harm).

²⁷ Jim Harbaugh, University of Michigan Athletics.

²⁸ College Football Head Coach Salaries, USA Today (Oct. 2, 2023, 4:18 p.m.).

The Big Ten's decision to prematurely publicly punish the University also causes reputational damage that will affect the perception of the University in the minds of millions of people, directly affecting the value of the degrees alumni worked hard to attain. The Sixth Circuit has found that reputational damage is "precisely the sort . . . of injur[y] this circuit has said [is] difficult to quantify monetarily, and thus constitute[s] irreparable harm."²⁹

On the other hand, the Big Ten would not be harmed by being required to follow its own procedures as outlined in Rule 32 of the Big Ten Handbook. These require the Conference to await the outcome of the NCAA investigation before interfering with contests between its member schools. Nor would it be harmed by allowing its member schools to continue competing on an equal footing — with both teams in each contest having their head coaches — until the NCAA investigation is finished and established procedures followed.

The University of Michigan and Harbaugh are likely to prevail on the merits of their claims because the Big Ten's failure to follow its own rules, and its decision to capriciously accede to the self-interested demands of Michigan's rivals for instant punishment, defeats the purpose of membership in an athletic conference. The core idea of a conference entails equal treatment of members under an impartially applied framework of rules; conferences may not pick favorites and allow schools to gang up on each other in pursuit of a competitive advantage.

 ²⁹ ACT, Inc. v. Worldwide Interactive Network, Inc., 46 F.4th 489, 503–04 (6th Cir. 2022); see also S. Glazer's Distributors of Ohio, LLC v. Great Lakes Brewing Co., 860 F.3d 844, 853 (6th Cir. 2017) (finding that losing goodwill is a prime example of an intangible and irreparable harm).

III. Conclusion

A temporary restraining order and preliminary injunction are the only equitable remedies that can prevent irreparable harm to the University of Michigan football team, Coach Harbaugh, and the University as an institution — including its alumni.

The Big Ten's acquiescence to Michigan's rivals also risks endangering the university's relationship with Jim Harbaugh, a coach who restored Michigan Football to its historic greatness and could have any available coaching job he wants at any level. As author John U. Bacon wrote about his time researching for one of his books about Michigan football:

I saw thousands of Michigan devotees — students, faculty, lettermen, alumni, and fans — work tirelessly inside and outside the athletic department, often risking their financial well-being, their job security, or both, to . . . make a plausible pitch for Jim Harbaugh to return to Ann Arbor.³⁰

Those efforts were not in vain; the community lured their coach from the NFL, and they ask this Court to help them keep it that way. Neither Coach Harbaugh nor the athletes he leads nor the University and alumni they represent deserve to be arbitrarily punished for the benefit of rival schools without the benefit of due process. Plaintiffs' motion for a preliminary injunction should be granted.

³⁰ John U. Bacon, *Overtime*, Introduction (Marine Books, Kindle Version 2019).

Additional signatories page attached.

Date: November 14, 2023

Respectfully submitted,

Rushing McCarl LLP By: Ryan McCarl Pro haec vice motion pending

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ADDITIONAL SIGNATORIES

The following individuals wish to add their names in support of this brief:

I. Verified

Signatory	Class Year		
Harold Sommerschield	1959	Ken Smith	1973
Arthur H Friedman	1961	Wanda A. Smith	1973
Robert E. Welke	1963	David C. Idema	1973
Rosalind Rosenberg	1963	Jill Fenton	1973
Simon Coleman	1963	Michael Briand	1974
Susan Reavis Cragg	1964	Richard Bonny	1974
Virginia Richards Erskine	1967	Tom Trombley	1974
Robert R. Lohrmann	1968	Maribel Andonian	1974
Michael P. Mcdermott	1968	Mary J Wrighr	1974
Lee Francis Wealton	1969	Ronald L. Brociner, M.D.	1975
Roger Edwin Powlison	1969	Jeffrey W. Bracken	1975
David Brian Hatton	1971	Matthew D. Breyer	1975
Martin James Schuch	1971	Jeff Lipshaw	1975
John Jancar	1971	Chris Andrews	1975
Paul F. Sefcovic	1971	Michael S Frank, M.D.	1975
Raymond J Wezner	1971	Janice Van Sweden-Fryling	1975
Sara Frank	1971	Jerome J Kozak	1975
John H Hamilton	1971	Diane M Yordy	1975
Jack L. Wuerker	1972	Lynn Schefsky	1976
Harry Duffield	1972	A Scott Klein	1976
Richard S. Cornfeld	1972	R. Stephen Olsen	1976
Robert M Soderstrom,	1972	Joel Winston	1976
M.D.		-	
Kenneth C Seitz	1972	Donna J. Smith	1976
Don Kaegi	1972	Kurt A. O'Keefe	1976
Ken Smith	1973	Larry Petro	1976

Karen Wismer Hollingsworth	1976	David Jenkins	1980
Albert N. Steck	1977	Mary C. Oliver	1980
Richard Navin	1977	Richard Black Yeomans	1980
Thomas Reid Kavieff	1977	Costa Buterakos	1980
Douglas Ferguson	1977	Thomas Hollowell	1980
Jeanette Manetta Phillips	1977	Scott F Holder	1980
Denise Marie Bond	1977	Robert M. Owen	1980
Curtis J. Stephenson	1977	Nancy Jacobs	1980
Richard J Kaplan, Esq.	1977	Michael Votta	1981
Craig S. Andrews	1977	Kurt Hagemeister	1981
Beverly Wistert Vandegrift	1977	James Howe	1981
Karin Hovsepian Tartal	1977	Timothy A. Vanwingen	1981
Judy Goodstein	1978	Don Hubbard	1981
Michelle Romano	1978	Susan G. O'Neill	1981
Lawrence E Burnstein	1978	Donna L Kerr	1981
William Robert Duge	1978	David Johnston	1981
Rick Devries	1978	Martin Countegan	1981
James F. Else	1978	William L. Mcmullen, Jr.	1981
William B Kline	1978	Sam Nicholas	1981
Richard Breyer	1978	Vincent Pavone	1981
S. Thomas Wienner	1978	Marcia Jablonski	1981
Gregory K. Need	1978	Karl Kroshinsky	1981
Dr. David Warsh	1978	Michael Burton	1981
James Berra	1978	C. Ronald Cooper	1981
Gar Zarins	1979	Lee F Mcallister	1981
Robert E. Shields III	1979	Joseph Lawrence Oates Jr	1981
Pamela Martin Turner	1979	Peter W Miller	1981
Patrick J. Donnelly	1979	Christine Kaczmarek	1981
r derek j. Donneny		Graham	
Robert Weiland	1979	Molly M. Shirer	1981
Charles C. Lane	1979	Garry R. Smith	1982
Deborah Stankevich	1979	Dean Degrendel	1982
Christopher Grundler	1980	Laura Pieri	1982
Roger Lauricella	1980	Henry Buddy Moorehouse	1982

Steven Keller	1982	Brian R. Walby Sr.	1984
Scott Hammersley	1982	Michael Lemirande	1984
Harrison J. Dossick	1982	Royal Ward	1984
Jennifer Tuttle Merrill	1982	Andrew P Metinko Md	1985
Terrence Haugabook	1982	Daniel Strach	1985
Robert Hillebrand	1982	Gerald Jagrowski	1985
Mark Supeeko	1982	Johnsy Chua	1985
Fred Dinger	1982	Tim Gardiner Adams, Jr, Md	1985
Stephen Sauter	1982	Matt Mittelstadt	1985
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Sean Lindsey	2021	Abby Rose	2022
Collin Grose	2021	Randy Rodich	2022
Andrew Krantz	2021	Keaton Carattini	2022
Justin Keller	2021	Barrett Bongiorno	2023
Sam Durno	2021	Nathan Graham	2023
Mac Mahacek	2021	Drew Wotta	2023
Jared Fishman	2021	Michael Maher Yousif	2023
Matthew Riekens	2021	David Elam	2023
Spencer Pippin	2021	James Mcgranahan	2023
Alexander Philpott	2021	Ryan Kauffman	2023
Elizabeth Graham	2021	Thomas Bolstad	2023
Annie Schnoll	2021	Jacob N Riegel	2023
Cameron W Danyo	2021	Jack Williams	2023

Ethan Perlmutter	2023
Catherine Wagner	2023
Jacob Kadans	2023
Ryan Downey	2023
Carter Neering	2023
Reed Scheinberg	2023

II. Spot-Checked But Not Confirmed as to Degree

Signatory	Class Year		
Melvin Dana Baldwin II	1964	Jay Pensler, M.D.	1976
Bart S. Foreman	1965	Elizabeth Tolleson Meyers	1976
Peter Schultz	1968	David A Finn	1976
Peter Guy Klein	1969	Paul A. Hathaway	1976
-	1969	Virginia Przygocki Maiden	1976
Randall Brown		Name Davis	
Michael Smith	1969	Robert David Baron	1977
William Keating	1970	Charles Gingrich	1977
James F. Wheeler	1971	Alvin Schoenberger	1977
Wilbur Krusell	1971	Mary Carolyn Bogart	1977
Carl Paulina	1972	Susan Kivisto Ledrew	1977
Lawrence J. Lutz	1972	Michael M Upton	1978
Tom Carhart	1972	Paul K Rosbolt	1978
Randall Penning	1972	Deborah L Nemesi	1978
Howard D Richards	1972	Beverly Howze, Phd	1978
Thomas Gazella	1972	Dr. David Cramer	1978
Frederick S. Muenchinger	1972	Brent Holcomb	1978
Michael R Julien	1973	Thomas Lighthill	1979
Leonard Alan Henk	1973	John Tulloch	1980
Jonathan A. Chase	1973	Phuong Vinh, Md	1980
Russell Allenbs	1973	Matthew D. Telliga	1980
David H Grossman	1974	Abby Rubenstein	1980
Gary Potts	1974	Mark Oakeson	1980
Robert Burns	1974	Mike Koinis	1980
David S. Zurvalec	1974	Michael R. Weaver	1981
Susan H. Zurvalec	1974	Richard E Quinn	1981
David Balcom	1974	Mark Vanstrien	1981
William I. Sohl, Jr.	1975	Kathy Sittnick	1981
Peter Jaksa	1975	William Ritter	1981
Joel F. O. Richert	1975	Sara Llibre	1981
James F. Epperson	1975	James Sidor	1982

Kathryn Ailgur	1982	Beverly Vargo	1987
Ellen Rivera	1982	Michael Perez	1987
Durelle A Ray	1982	James Malayang	1987
Kiprian Miles	1983	Jeffrey H. Weir II	1987
Kimberly Hamed	1983	Reesuk Isaac Kim	1988
Matthew G. Johnson DDS	1983	Gregg Clark	1988
Roger Jimenez	1983	Julie Lowitz	1988
John Cugliari	1983	Daniel Snyder	1988
David Carrell	1983	Marcos Ortega	1988
Melinda Lehman	1983	Brian Bedrick	1988
Patrick Houlihan	1984	Jerry Wish	1988
David F. Thompson	1984	David M Bugajski	1989
Paul Brand	1984	Jim Brucker	1989
William Klausmeyer	1984	Deborah A Stevens	1989
Victor Thompson	1984	Lawrence Brocchini	1989
Ed Radwan	1984	Kari Lomerson Williams	1989
David Moorhead	1984	Vineet Sahgal	1989
Renee Townsend	1985	Kenneth Kramer	1989
Kathleen Mcgovern Miller	1985	Carol A Mceldowney	1989
Michael Mcgraw	1985	Paul Selvin	1989
Alyssa Polack	1985	Rachel Steckelman Selvin	1989
Marian Sawicki	1986	Lisa Wu	1989
Yayoi Kushida	1986	Michael Cheng	1989
Daniel B Silkworth	1986	Roberta Herzig	1989
Gail Bernard	1987	Andrew R. Macko	1989
Frank R Adams	1987	Robert Johannes Arnold	1990
Robert Schaller	1987	Marvin Anderson	1990
Jennifer Heyman	1987	Mary Ann Llanes	1990
Carolyn J Bruzdzinski	1987	Mark Mendelis	1990
James Zwolensky	1987	Nancy Wessel Daas	1990
-			

Stephen Smith	1990	Donald Shin	1993
Dwight M. Herdrich	1990	Michael T Berens	1993
Cathie G. Miller, Phd	1990	P.J. Shanker	1994
Steve Rosewarne	1990	Jason Kesselman	1994
Douglas R. Healy	1991	Michael Michetti	1994
Jarrod White	1991	Robert Chames	1994
Samuel Carbone	1991	Jill Lynn Redmon	1994
Paul W. Furlo	1991	Kevin Veeder	1994
David Adams	1991	Carl Bade	1994
		Maricris Tina Abreu	1994
Michael Andrew	1991	Christesen	
Michael John Misiak	1991	Jeffrey Havlicek	1994
Rich Wilkie	1991	David Siegel	1994
Aaron Malina	1991	Jeffrey Brian Faath	1994
Jin Hong Park	1991	Debra Jose	1995
Debra Hunt	1991	Jonathan Lax	1995
Paul Ingram	1991	Paul Podzikowski	1995
Paul M. Lasala	1991	Glen Fish	1995
David Balkan	1991	Lynne Thomas	1995
Pamela Crockett	1992	Tisha Straetmans Macuga	1995
Edward Howe	1992	Jennifer Degeus	1995
Douglas Heaps	1992	Michael Cymerman	1995
Tommy Lo	1992	Rodney Dewyer	1995
Crane Pomerantz	1992	Brad Schafer	1996
Pamela Herzig	1992	Kristen Mcknight	1996
Michele Fila	1992	Avery Chi	1996
Bruce Crookes Md Mba	1992	Nikki Aquino	1996
Blair A. Rosenthal	1992	Jennifer Schafer	1996
Arthur J. Penn	1993	Michelle Kessel	1996
Eric London	1993	Dr. Roger Achong	1996
Brad Miller	1993	Jill Nelson	1996

John Sosa, M.D.	1996	Ed & Hilda Martin	1999
Scott Cocchiere	1996	Orlin Hadjiev	1999
Anil Asgaonkar	1996	Dana Rubin Frank	1999
Brian R. Long, MD	1996	Paola Ballester Dees	1999
Amy Worden	1996	Keivu Knox	1999
Mark Vainisi	1996	Ki Hee Yoon	1999
Robert C. Varnell	1996	Corey D. Flaum	1999
Sue Bennis Olear	1996	Darin Cepeda	1999
Frank Burger	1997	Aaron Price	1999
Tyler Brubaker	1997	Jordan Broad	1999
Shan Yin	1997	Christopher H Bignell	1999
Joshua Blumberg	1997	Shawna French	1999
Todd Anderson	1997	Josh Stoler	1999
James Hawkins	1997	William Farah	1999
Terry Ford	1997	Dawn M. Burke	1999
Bryan Ringnalda	1997	Srinivasa Reddy	2000
Nicholas Farrell	1997	John Kraft	2000
Victor Rafael Herrera Silva	1997	John W Tomasik	2000
Timothy R Burch	1997	Travis Bertke	2000
James T. Mcgovern	1997	David Malak	2000
Jeffrey A Sirak	1997	Kelly Weston	2000
Angela Fitchett	1998	Joseph Suski	2000
Brian D Mohr	1998	Noah Karberg	2000
David Christopher	1998		2000
Murphy		Kurt New	
Jennifer E Mullholand	1998	Juan-Carlos Campos	2000
Matthew Peterson	1998	Wendy Goodson	2000
Venessa M. Howard	1998	Alec Lang	2000
Joann Lute	1998	Bradley Zasa	2001
Suzanne Enciso	1998	Paul Odoom	2001
Eric Frickel	1998	Chris Garrett	2001

Megan Bordes	2001	Derek Zahran Lavelle	2003
Amita Gupta	2001	Matthew Milazzo	2003
Sanjay Krishna	2001	Daryl Wout	2004
Steven Dunk	2001	Katherine Den Bleyker	2004
Charles Lamb	2001	Jebediah Northern	2004
Jason J. Rapp	2001	Cesar E. Fors	2004
Nicholas Koster	2001	John Michael Mooney	2004
Todd Peterson	2002	Matthew Dulas	2004
Alexander Smith	2002	Katherine Den Bleyker	2004
Michael P. James, Esq.	2002	Jebediah Northern	2004
Rudy Smith	2002	Cesar E. Fors	2004
Daniel Reback	2002	John Michael Mooney	2004
Meghan Dryzga	2002	Matthew Dulas	2004
Peter Fogler	2002	Brian Lillie	2004
Mark Galsterer	2002	John Pollock	2004
Jerry Dawes	2002	Daniel Milan	2004
Andrew Mccloskey	2002	Jeffrey A. Parr	2004
Peter Baldwin	2002	Michael Deogracias	2004
Chris Cassidy	2002	Graham Fiorani	2004
Nirav Patel	2003	Dan Cooke	2004
G. Matt Buhyoff	2003	Lauren Cecil	2004
Timothy J Hall	2003	Shaan Wadhwa	2005
Stephen T. Blackburn	2003	Brian Polk	2005
Tanya Ej Lundberg	2003	Ethan Goodman	2005
William Tolbert	2003	Ryan Bates	2005
Christopher S. Puzzio	2003	Robert Sprague	2005
Matthew Werner	2003	Casey W. Bourke	2005
Ralph L. Carlton II	2003	Sara Sprague	2005
Abigail Clark	2003	Bryan Sofen	2005
Matthew S Ghaman	2003	Jenifer Mac	2005

Christin Plunkett	2005	Blake Searight	2007
Scott Davison	2005	Matt Burskey	2007
Jake Cotler	2005	Charles Persensky	2007
Christina Dewey	2005	Erik Wetzler	2007
Andrew Young	2005	Nicholas Gasperoni	2008
Daniel Wucherer	2005	Agatha Gasperoni	2008
Eric Moberg	2005	Jordon Banfield	2008
James Mercier	2006	Jonathan Moll	2008
Robert Precht	2006	Kelly Draeger	2008
Stephen Parks	2006	Ankit Mehta	2008
Sean J. Stringer	2006	Brittany Weiner	2008
Jim Huang	2006	Matt Kettmann	2008
Ross Ericksen	2006	Michael Haigh	2009
Nicholas Colvin	2006	Brett Serafin	2009
Mark Freudenthal	2006	Andrew Helvie	2009
Melanie Brock	2006	Edward B. Walker II	2009
Peter Hatz	2006	Sarah Jacob	2009
Jon Schiller	2006	Lucas Whalen	2009
Stephen Sullivan	2006	Roland Abel Hernandez	2009
Kristen Wisniewski	2006	Frances E Toutant Hoover	2009
Robert Vogt	2006	Christopher Cichon	2009
Kyle Nickerson	2006	Jasem Yousuf	2009
Reginald Brown	2007	Richard Grubb II	2010
William Sarosi	2007	Jon Villasurda	2010
Melanie Taves	2007	Neusha Sayadian	2010
Jessica Jackson	2007	Marc Krieberg	2010
Matthew Penkevich	2007	Jaryd Solomon	2010
Sam Grossman	2007	Andrew Stem	2010
Paul Yoo	2007	Leigh Genetti Byers	2010
Alex Brumel	2007	Jason Cooper, Esq.	2010

Sam Kim	2010	Matthew G Knepfler	2013
Bradley Graham	2010	Brandon Holbert	2013
Jason N. Reisfeld	2010	Matthew Cornett	2014
Timothy Holman	2010	Jennifer Florip	2014
Todd Leuffgen	2011	Jason Doyle	2014
Evan W Schuetz	2011	Patrick Maillet	2014
Kyle Schilling	2011	Mitchell Kuchenberg	2014
Anthony Moffitt	2011	Christopher R. Kline	2014
Lauren Hantz	2011	Joshua Schuyler	2014
Omar Hussain	2011	Adam J. Lane	2014
Marc Wagner	2011	Kevin Michaud	2014
Sarah Sefcovic	2011	Joey Lai	2014
Bharath Iyengar	2011	Mark Kiel	2014
Leanne V Heilig	2011	Michael Shook	2014
Brandon Wagoner	2011	Andre Markon	2014
Kelly Seestedt	2011	John Diamond	2014
Justin Mitchell	2012	Joseph Truzzolino	2014
Sharvil Shah	2012	Jake Behrman	2014
Yih-Wei Chien	2012	Connor Townsend	2015
Kyle Fairbanks	2012	Tyler Brochhagen	2015
Synthia Britton	2012	Elizabeth Sabia	2015
Matthew Krieg	2012	Thomas O'toole	2015
Paul C Sefcovic	2012	Kevin Bautista	2015
Marshall Turner	2012	Nickhil Bhave	2015
Kevin Joseph	2012	Jordan Samet	2015
Matt Durham	2012	Kyle Ritsema	2015
Bradley Kerch	2012	Conor Krouch	2015
Noah G. Goodman	2013	Joe Murray	2015
Benjamin Sheler	2013	Steven Lovera	2015
Mark William Lelli Jr	2013	Raymond J. Kim	2015
Brian Klemczak	2013	Kristen Vanderploeg	2015
Kyle Bradshaw	2013	Spencer Howard	2016
Vincent Barnes, Jr.	2013	Micaela Brand	2016
Jih-Wei Liang	2013	Jordan Nachbar	2016

	001/		2020
Nathaniel Steeby	2016	Danielle Lundstrom	2020
Matthew Steinmetz	2016	Todd Philabaun	2020
Jeffrey Sims	2016	Jessica Lowen	2020
Dalton Dondero	2016	Alissa Moore	2020
Joe Klein	2016	Quinn Smith	2020
Lyle Andrew Tripp	2017	Connor Mulliken	2020
Neil Arthur	2017	Andrew Budziak	2020
Matthew Saraceno	2017	Jeff Yang	2020
Jennifer Vanderlinde	2017	Santiago Lostao	2020
Christopher Gannon	2017	Andrew Rabines	2020
Elizabeth Lewandowski	2017	Nicole Eldred	2020
Derick Johnson	2017	Tarakorn Soonthornwinate	2020
Carl Faraon	2017	Tyler Schwerin	2020
Sachin Raval	2017	Sebastian Iniguez	2020
Tanu Bhargava	2017	Samantha Weiser	2020
Lawrence Krajewski	2017	Alexander Furnas	2020
Andrew Galler	2017	Ashley Perry	2020
Mathew Shadik	2017	Perry Fischer	2020
Emily Fairbanks	2018	Trevor Purman	2021
Conor Quick	2018	James Steven Buster	2021
Nancy Graham	2018	Nicholas Pizzo	2021
Niko Porikos	2018	Niquel Gingell	2021
Craig Motola	2018	Jenna Salter	2021
David Joseph Wiebelhaus	2018	Freeman Zhang	2021
Bradley Spilka	2018	Ronan Cain	2021
Corey Ortiz	2018	Kyle Rechter	2021
Keantae Wilkie	2019	Heidi E. O'Hora	2021
Ryan Susterich	2019	Sushanth Sunil	2021
Rik Banerjee	2019	Rohan Sinha	2021
Jacob W. Goldschlag, Esq.	2019	Patrick Stafford	2021
Greg Bjork	2019	Rachel Chiou	2021
Courtney Kiseda	2019	Maddie Taylor	2022
Seth R. Gregory	2019	Roger Crimmins	2022
William Waters	2019	Faith Allen	2022

Kristos A Mccarthy	2022
Laura Graves	2022
Alexandro Byrd	2022
William James	2022
Henry Taylor	2022
Anthony Dibello	2022
Chandler Jones	2022
Amanda Schaare	2022
Talon Gilchrist	2022
Lindsay Miles	2022
Justin Sherman	2022
Kyle Grady	2022
Jessica Verona	2022
Ankith Udupa	2023
Ken Maschke	2023
Vernon Burden	2023
Morgan Ciorciari	2023
Jordan Shefman	2023
Alec Behrendt	2023
Rithik Doddla	2023
Gregory Krzyston Jr	2023
Matthew Roller	2023
Annika Erickson	2023
Stefan Grueneis	2023
William Mizer	2023
Samuel Boezwinkle	2023
Lillian Mei	2023
Zachary Ellis	2023
Fangwen Lee	2023
Alan Podolsky	2023
Madelyn Cook	2023
Casey Buckley	2023