UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

LAUREN DONINGER, P.P.A. As Guardian and Next Friend of Avery Doninger, a minor, Plaintiff, v. KARISSA NIEHOFF and PAULA SCHWARTZ, Defendants.	:	CIVIL NO. 3:07-cv-1129 (MRK)

**BRIEF OF AMICUS CURIAE,
AMERICAN CIVIL LIBERTIES UNION OF CONNECTICUT,
IN SUPPORT OF PLAINTIFF'S MOTION FOR A
TEMPORARY RESTRAINING ORDER/PRELIMINARY INJUNCTION**

The American Civil Liberties Union of Connecticut ("ACLU-CT") submits this Brief in support of plaintiff's motion for a temporary restraining order/preliminary injunction.

Introduction

According to Plaintiff's Proposed Findings of Fact and Conclusions of Law, filed in preparation for a hearing on her motion for a temporary restraining order/preliminary injunction, Avery Doninger used her personal computer while at home to post a comment on an online web log journal (also known as a "blog"), stating "'Jamfest' is cancelled due to douchebags in central office." After she refused to resign her position as class secretary, she was removed from the position and informed that she was disqualified from running for it. She and some student supporters later tried to enter the school

auditorium, where class officer candidates were making speeches. She wore a t-shirt with the message "R.I.P. DEMOCRACY" on it and was holding a t-shirt that had "Team Avery" printed on the front and "Support LSM Freedom of Speech" on the back. She was prohibited from entering the auditorium unless she took off the first t-shirt.

Defendants have no legal authority to punish Ms. Doninger for her internet post on her home computer. United States Supreme Court and Second Circuit precedent, as well as decisions by other federal courts, make it clear that public school administrators cannot sanction student expression, regardless of its content, when it occurs on the student's own time and away from school premises, and when there is no showing that the expression is likely to cause material and substantial disruption to school operations. Furthermore, Defendants had no authority to prohibit Ms. Doninger and her classmates from wearing t-shirts in school that bore non-vulgar slogans protesting the punishment. Both actions violated Ms. Doninger's First Amendment and state constitutional speech and petitioning rights.

ARGUMENT

I. UNITED STATES COURTS HAVE LONG HELD THAT SCHOOL ADMINISTRATORS MAY NOT SANCTION OFF-CAMPUS STUDENT SPEECH.

In 1969, the United States Supreme Court recognized that a school may sanction student speech, whether occurring in or out of school, if – and only if – it can show that the speech is likely to "materially and substantially interfere" with school work and discipline. Tinker v. Des Moines Indep. Sch. Dist., 393 U.S. 503, 513 (1969) (citation omitted) Tinker involved a group of high school students who wore black armbands to school to protest the Vietnam War and were suspended. Id. at 504. The Supreme Court

held that school officials could not suppress their expression based on the mere "wish to avoid the controversy which might result from the expression." Id. at 510.

"Substantially" means just that. Mere student "buzz," i.e., animated discussion in response to the speech content, does not rise to the level of "substantial disruption." See Layshock v. Hermitage Sch. Dist., --- F.Supp.2d ---, 2007 WL 2022096, at *10 (W.D. Pa. July 10, 2007) (citation omitted) (commenting upon the Tinker majority's indifference to the dissent's concerns, 393 U.S. at 517-18, about the "boisterous environment" caused by "children wearing anti-Vietnam War armbands"). Nor do the shock, outrage, revulsion or hurt feelings of teachers or administrators. See Thomas v. Bd. of Educ., Granville Cent. Sch. Dist., 607 F.2d 1043, 1052 n.17 (2d Cir. 1979). Rather, the anticipated disruptive effect must be severe enough to threaten "academic discipline" to the point where the school cannot "operate normally." Id. (noting that, although the Board President was shocked, the school continued to operate normally).[1]

There are two pertinent exceptions to Tinker. The first is when a student engages in vulgar speech – speech that is lewd, profane, or sexually explicit – on school grounds during school hours, or at a school-sponsored function. On the premise that a school may define its mission as including the teaching of civility, the school may punish the speaker without showing that the utterances are likely to cause material and substantial disruption. See Bethel Sch. Dist. No. 403 v. Fraser, 478 U.S. 675, 681-86 (1986). This is so even though vulgarity normally commands First Amendment protection – i.e., it does

[1] Furthermore, the disruption must occur, or be reasonably anticipated to occur, in response to the student's speech – not in response to the administration's decision to punish the student. Disruptions arising out of protests against punitive actions are not imputable to the speaker. Latour v. Riverside Beaver Sch. Dist., No. 05-1076, 2005 WL 2106562, at *2 (W.D. Pa., Aug. 24, 2005); Layshock, 2007 WL 2022096, *10.

not fall within any recognized speech exception such as "fighting words," Chaplinsky v. State of New Hampshire, 315 U.S. 568 (1942); obscenity, Miller v. California, 415 U.S. 15 (1973); or a "true threat," Wisniewski v. Bd. of Educ. of the Weedsport Cent. Sch. Dist., --- F.3d ---, 2007 WL 1932264, at *3 (2d Cir. July 5, 2007)(citation omitted) – and is hence immune from criminal or civil penalty. As Judge Newman of the Second Circuit presciently wrote in Thomas, seven years before Fraser, "'the First Amendment gives a high school student the classroom right to wear Tinker's armband, but not Cohen's jacket.'"[2] Fraser, 478 U.S. at 682 (quoting Thomas, 607 F.2d at 1057 (Newman, J., concurring in result)).[3] As Ms. Doninger's expression – "'Jamfest' is cancelled due to douchebags in central office" - took place out of school, even assuming arguendo it is vulgar, it does not fall within this exception and cannot be subjected to sanctions.

The United States Supreme Court recently recognized a similar exception for advocating illegal drug use in school or at a school-sponsored event. See Morse v. Frederick, 127 S.Ct. 2618 (2007). The rationale of the Court's carefully limited opinion is the same as in Fraser: the school may define its mission as including the promotion of a drug-free, law-abiding lifestyle. Id. at 2628. Accordingly, it may proscribe speech that undermines this mission, and need not comply with Tinker in order to do so.[4]

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[2] It is axiomatic that the fighting words exception only applies to invective directed to a particular individual who is present or likely to be present, so as to create a risk of violence, and speech is not obscene unless it is sexually arousing, patently offensive, and without substantial redeeming value. See Layshock, 2007 WL 2022096, at *13 (citations omitted). A true threat is one that a reasonable listener would take seriously. United States v. Francis, 164 F.3d 120 (2d Cir. 1999). The present record, though sparse, definitively rules out all these categories.

[3] In Cohen v. California, the Supreme Court held that a defendant could not be convicted of breach of peace or kindred offenses merely for wearing, in public, a jacket that bore the word "Fuck." 403 U.S. 15 (1971).

Id.

Ms. Doninger's blog did not involve advocacy of illegal drug use or any other illegal activity. Defendants therefore appear to place their hopes in Fraser, believing that it somehow entitles them to proscribe and punish what they perceive as vulgar student speech wherever and whenever it occurs -- even when it occurs in the student's own home, on the student's own time, through the use of the student's own personal computer. If so, they are very badly mistaken.

A. Both Fraser And Frederick Squarely Refute Defendants' Extraordinary Assertion Of A Round-The-Clock Power To Police Student Lives And Student Morals.

In Fraser, the Court found that a student's speech at a student assembly employed "an elaborate, graphic, and explicit sexual metaphor." 478 U.S. at 678. The opinion attaches great importance to the fact that the speech occurred in school, during school hours, at an official school function. Id. at 680-81. Nowhere does the Court remotely suggest that the school's authority extends to non-disruptive off-premises speech, regardless of its lewdness or vulgarity. Indeed, the emphasis on the venue clearly implies the opposite. Id. at 685 ("A high school assembly or classroom is no place for a sexually explicit monologue . . . ")(emphasis added).

Morse is equally telling. The student in that case unfurled a banner that read "Bong Hits 4 Jesus" as the 2002 Olympic Torch Relay passed the school. 127 S.Ct. at

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[4] A third Tinker exception arises in the case of school-sponsored student speech: namely, speech that a reasonable listener or reader might impute to the school, such as articles appearing in an official school newspaper. Hazelwood Sch. Dist. v. Kuhlmeier, 484 U.S. 260 (1988). Hazelwood is not implicated here, inasmuch as no reasonable person would imagine that defendants or the school had endorsed Ms. Doninger's use of the word "douchebag."

2622. The students were allowed to leave class during school hours to observe the event. Id. at 2624. Morse did not involve vulgar student speech; rather, the Court found it reasonable for the school principal to believe that the banner encouraged the use of illegal drugs. Id. Like Fraser, however, the case did involve a Tinker exception. Importantly, the Court took great pains to explain that the exception applied only because the speech, although it did not take place on school property, nevertheless occurred under school auspices: during the school day, at a school-sponsored event that was monitored by the school's teachers and administrators. Id. at 2624. The students had been released from school, under supervision, to watch the Torch go by. Whether the event was school-related enough to justify the Tinker exception was, in fact, one of the principal issues in dispute. It is clear beyond cavil that if the Court had resolved this issue differently – if the majority had concluded, in other words, that the event was not school-related – the exception would not have applied, and the discipline would have been sustainable only upon a showing of material and substantial disruption.

As both Morse and Fraser constitute a Tinker exception, there is no discernible reason why they should be analyzed differently. Morse itself expressly equates the two by stating that the decisive question, in each, is whether Tinker controls the outcome. 127 S.Ct. at 2626-27. If the Morse exception for drug-related speech applies only when the speech occurs in school or at a school-sponsored event, the Fraser exception for lewd or vulgar speech applies under the same circumstances. Defendants, accordingly, have no power to punish Ms. Doninger for her non-disruptive, off-campus utterance.

B. Second Circuit Precedent (Including Post-Morse Authority) Denies Defendants Power To Punish Non-Disruptive Vulgar Student Speech Occurring Off School Premises.

Thomas could not be clearer: a school's power to control off-premises student speech is circumscribed by Tinker. Thomas involved a student newspaper that, for the most part, was written, published and distributed off-grounds. 607 F.2d at 1045.[5] It was intended to be satirical. Id. Its banner described it as '"uncensored, vulgar, immoral." Id. at 1046 n. 3. The Court stated that it was "saturated with distasteful sexual satire, including an editorial on masturbation and articles alluding to prostitution, sodomy and, castration." Id. at 1046 n.3. A small amount of work on the paper had been done on school grounds. Id. at 1045.

The student authors were suspended and subjected to other sanctions. The panel, unanimous as to the outcome, overturned the punishments in their entirety.[6] In doing so, Judge Kaufman, author of the opinion, issued the following pronouncements. "[T]he arm of authority does not reach beyond the schoolhouse gate." Id. "[B]ecause school officials have ventured out of the school yard and into the general community where the freedom accorded expression is at its zenith, their actions must be evaluated by the principles that bind government officials in the public arena." Id. at 1050. It states "we reject the imposition of . . . sanctions for off-campus expression." Id. at 1051. "We can,"

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[5] Thomas's plaintiffs made some slight use of school equipment. The panel, however, dismissed such use as too "de minimis" to affect the analysis or the outcome. "That a few articles were transcribed on school typewriters, and that the finished product was secretly and unobtrusively stored in a teacher's closet do not alter the fact that [the newspaper] was conceived, executed, and distributed outside the school." 607 F.2d at 1050.

[6] Judge Newman differed from his colleagues only as to the school's authority to prohibit future distribution of the newspaper on school property. 607 F.2d at 1054 (Newman, J., concurring).

Judge Kaufman conceded, "envision a case in which a group of students incites substantial disruption within the school from some remote locale. "We need not, however, address this scenario because, on the facts before us, there was simply no threat or forecast of material and substantial disruption within the school." Id. at 1052 n.17 (emphasis added). In other words: to regulate off-premises vulgarity, a school must comply with Tinker.[7]

Wisniewski, decided after and in light of Morse, holds to the same effect by inescapable analogy. 2007 WL 1932264, at *4. The middle school student in that case had transmitted an icon from his home computer. The icon was a small drawing of a pistol firing a bullet at a person's head, above which were dots representing splattered blood. "Beneath the drawing appeared the words 'Kill Mr. VanderMolen.'" Mr. VanderMolen was the student's English teacher. Id. at *1.

The school, upon learning of this, suspended the student, whereupon he sued. The Second Circuit first considered whether the transmittal constituted a "true threat," as the First Amendment would not be implicated if it did. Id. at *3-4. See also United States v. Francis, 164 F.3d 120 (2d Cir. 1999) (holding that true threats are conduct, not speech, and hence are unprotected in any setting). Ultimately though, the Court, per Judge Newman, found it unnecessary to resolve this question, because even if there was no true threat in the legal sense, the message was intimidating enough to the targeted teacher and others to have a "materially and substantially" disruptive impact on the work

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[7] Judge Kaufman further suggested that, by reaching out to control student expression off-premises and indeed in the home, the school had violated, not only the First Amendment rights of the students, but also the parental autonomy, vis-a-vis due process rights of their parents. Id. at 1051.

and discipline in the school. 2007 WL 1932264, at*4. Thus the Court, assuming the utterances to be speech, upheld sanctions only upon a finding that Tinker was satisfied. Id. at *3-*5.

The impact of these cases on Ms. Doninger's case is readily apparent. Even assuming arguendo that her speech was lewd or vulgar under Fraser, it would not justify defendants' sanctions for her off-campus activity.

C. Out-Of-Circuit Authority (Including Post-Morse Authority) Denies Defendants Power To Punish Non-Disruptive Vulgar Student Speech Occurring Off School Premises.

A recent case in the District Court for the Western District of Pennsylvania is instructive in the case at bar. In that case, a high school student, using a home computer, posted on MySpace[8] what purported to be a profile of his school's principal, which he represented as having been created by the principal himself. See Layshock, 2007 WL 2022096. The profile portrayed the Principal as, inter alia, a drunk, a "steroid freak," a "big whore" and a "big fag." Id. at *1. The District Court assumed arguendo that the profile was "lewd, profane and sexually inappropriate." Id. at *9. The principal, whose daughter attended school in the district, was so distraught that he had to leave a meeting that he had convened to discuss the episode. However, "no classes were cancelled, no widespread disorder occurred and there was no violence or student disciplinary action." Id. at *10. The student was suspended, and brought suit.

The District Court's decision, rendered two weeks after Morse, began its discussion section with an analysis of that case. It deemed Morse's holding inapplicable,

[8] MySpace "is a very popular Internet site where users can share photos, journals, personal interests and the like with other users of the Internet." Layshock, 2007 WL 1932264, at *1.

because in Layshock the bulk of the expression occurred off-campus. Id. at *5.[9] Instead, it applied Tinker – and concluded that the defendants failed signally to establish the necessary level of disruption. It found that, singly or in combination, neither the principal's distraught reaction, id. at *3, nor the "offensive[ness]" and "unpleasantness" of the speech, id. at *11, nor the fact that students had "buzz[ed]" about the profile, id. at *10, nor the fact that one computer teacher had threatened to shut down the school's computer system (but never actually did so), id. at *10, nor the fact that the speech was "rude and demeaning," id. at *10, could persuade a reasonable jury to find the disruption sufficient. Id. at *10. In order for that to happen, the disruption would have to be so severe as to cause, or threaten to cause, consequences such as class cancellations, widespread disorder, violence, or student disciplinary action, or to render teachers "incapable of teaching or controlling their classes." Id. at *10 (citing Killion v. Franklin Regional School Dist., 136 F.Supp.2d 446, 455 (W.D. Pa. 2001)). The disruptive impact of Layshock's posting came nowhere close to these thresholds. Moreover, some of the events, such as they were – the "buzz," for instance – occurred in response to administrative disciplinary measures against the student and hence were not imputable to his speech. Id. at *4, 11 (citing Latour, 2005 WL 2106562, at *2). Accordingly, the school could not invoke them, in bootstrap fashion, to support the discipline.[10]

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[9] As in Thomas, a small portion of it took place on school property – the student had shown the profile to other students in a classroom – but the court, quoting Thomas, likewise found this on-premises activity too "de minimis" to be relevant. Id. at *11.

[10] Thus, even if the outpouring of pro-Doninger t-shirts could somehow be deemed disruptive – which under decisions such as Thomas and Layshock they surely could not – this would not avail the defendants, because they too were responses to the defendants' disciplinary action and not to Ms. Doninger's speech.

Amicus Curiae urges this Court to follow Layshock. Its opinion is entirely consistent with this Circuit's own precedents, as well as those of the United States Supreme Court.

In sum, the issue in this case is not whether schools can sanction off-premises student speech. They can – as long as they can satisfy Tinker by showing a foreseeable likelihood that the speech will materially and substantially disrupt the educational process. See Thomas, 607 F.2d at 1049; Wisniewski, 2007 WL 1932264, at *4.[11] The issue is whether they can sanction plaintiff's off-premises speech without satisfying Tinker. United States Supreme Court and Second Circuit precedent, as well as other federal court rulings, counsel that they cannot.

II. SCHOOL ADMINISTRATORS HAVE NO LEGAL AUTHORITY TO PREVENT STUDENTS FROM WEARING T-SHIRTS EXPRESSING OPPOSITION TO THE SCHOOL'S ACTIONS AGAINST MS. DONINGER.

In the Amicus' understanding, Ms. Doninger and her student supporters wanted to wear their pro-Doninger t-shirts on school time and in the school auditorium. The t-shirts bore the following messages: "Team Avery"; "R.I.P. Democracy"; "Support LSM Freedom of Speech." The messages were not vulgar. They did not advocate illegal drug use. There is no evidence that they caused or were likely to cause disruption. The Amicus further understands that school rules expressly permit the wearing of clothing that bears expressive slogans. The t-shirts in question were banned, therefore, because of their content, and more specifically because of their viewpoint. This implicates Tinker.

[11] For authorities in other Circuits that say the same, see Porter v. Ascension Parish Sch. Bd., 393 F.3d 608, 619-20, n. 40-44 (5th Cir. 2004). Some courts cite Thomas.

The courts of this Circuit have upheld the right to wear clothing with far more inflammatory messages than the relatively innocuous ones that the present record reveals. The Second Circuit recently ruled in favor of a student who was disciplined over a t-shirt that the panel understatedly described as "depicting President George W. Bush in an uncharitable light." Guiles v. Marineau, 461 F.3d 320, 321 (2d Cir. 2006). It accused the President, among other derelictions, of being "a former cocaine and alcohol abuser," and, "[t]o make its point . . .displays images of drugs and alcohol." Id. at 322. Finding the images neither lewd, as in Fraser, nor school-sponsored, as in Hazelwood, and finding no likelihood of actual or probable disruption, the court concluded that the shirt could not lawfully be proscribed.[12] Id. at 331.

Similarly, K.D. v. Fillmore Cent. Sch. Dist., held that a high school sophomore was entitled to wear, in school, a t-shirt that carried powerful anti-abortion messages. No. 05-CV-0336(E), 2005 WL 2175166 (W.D.N.Y. Sept. 6, 2005). The school principal had forbidden him to wear it, on the ground that the messages had "upset" several female students, some of whom had undergone abortions or were considering doing so, and three of whom had complained to him about the shirt. Id. at *2. These students, he believed, would construe the messages as a "personal attack." Id. He further argued that his concerns were unrelated to the messages' viewpoint, but rather arose from their "confrontational tone," which rendered them all the more offensive and upsetting. Id. at *4 n.8 (internal quotation marks omitted). The court gave these stated justifications short shrift: "The complaints simply do not rise to the level of a 'disruption' much less a

[12] The shirt did not advocate drug use – quite the contrary – and so the holding should be unaffected by the later one in Morse. Even were this not so, however, the panel's reasoning would still control Ms. Doninger's case, as the t-shirts here bear no drug-related messages or images.

'material and substantial interference' . . . Certainly students do not have a right to be 'upset' when confronted with a viewpoint with which they disagree." Id. at *6.

In K.D., the court noted that the principal's objections to the t-shirt were based on the "content" of the message, but not necessarily on its viewpoint. Id. at *5. In contrast, the viewpoint discrimination in the present case is undeniable. Where that is so, this Circuit has held that the school's action must be measured, not against Tinker, but against the even more daunting strict scrutiny standard. Peck v. Baldwinsville Cent. Sch. Dist., 426 F.3d 617, 631-35 (2d Cir. 2005), cert. denied, 547 U.S. 1097 (2006)(addressing school's refusal to allow a kindergarten student to submit a religious poster in satisfaction of a school assignment).[13]

If defendants' actions here could not survive Tinker – which, in the absence of material and substantial disruption they could not – a fortiori they cannot survive strict scrutiny. The Amicus asks this Court to rule accordingly.

III. DEFENDANTS' ARGUMENTS ARE MERITLESS.

In their Proposed Findings of Fact and Law, and in their Memorandum of Law, the Defendants proffer an extraordinary succession of arguments: that Fraser's vulgarity exception applies to Ms. Doninger's off-campus utterance; that Ms. Doninger's speech is unprotected because it does not address matters of public concern, and so forth. All of these arguments are meritless.

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[13] The ruling is the more remarkable for the fact that, because the poster was submitted in satisfaction of a school assignment, it constituted school-sponsored speech within the meaning of Hazelwood, 426 F.3d at 625, so that even Tinker's somewhat more modest protections would not normally apply. The panel believed, however, that the First Amendment's distaste for viewpoint discrimination trumped the deference that Hazelwood normally accords to public school officials.

Defendants' reliance on Fraser is refuted in Section IA of this Brief. As for the claim that the speech must address public concerns, defendants overlook Guiles which definitively establishes that this is not the law in the Second Circuit. Guiles expresses the Second Circuit's "understanding that Tinker applies to all non-school student speech that is not lewd or otherwise vulgar," whether or not the speech addresses public concerns.[14] 461 F.3d at 326. Assuredly, Thomas would have been decided differently, and Wisniewski would have been explained differently if it were otherwise, since no matter of public concern was presented in those cases.

Defendants' remaining arguments are equally unfounded. Defamation cannot be based upon subjective characterizations – characterizations, that is, that cannot be objectively proved or disproved – or on "loose, figurative, or hyperbolic language." Milkovich v. Lorain Journal Co., 497 U.S. 1, 20-21 (1990)(stating that "the statement 'In my opinion Mayor Jones shows his abysmal ignorance by accepting the teachings of Marx and Lenin' would not be actionable.") "Douchebag" is a prototype of this genre – and the suggestion that falsely stating that the Jamfest has been cancelled is defamatory flouts the most basic principles of defamation law, inasmuch as this statement does not impugn the reputation of any individual or group. The phone calls and emails that protested the defendants' disciplinary action against Ms. Doninger are irrelevant under cases such as Layshock and Latour, as discussed in Section IC, supra. The other phone calls – the ones that Ms. Doninger allegedly elicited via her email – may have been annoying, but annoyance does not amount to disruption according to the authorities that the Amicus cited throughout Section I. (Besides, in the Amicus' understanding of the

[14] After Morse, the exception would also extend to speech that advocates illegal drug use.

facts the discipline was not based on the emailing.) The Amicus knows of no evidence – as opposed to unsubstantiated speculation – that the t-shirts would be disruptive either, and certainly the minor incidents that were reported were not disruptive to any "material" or "substantial" degree. The election assembly, after all, went forward.

Finally, defendants appear to believe that they have nigh-plenary power to bar Ms. Doninger from student office because running for and holding elective student office are privileges and not rights. If so, the defendants are again badly mistaken. Even assuming that these are, indeed, mere "privileges," American constitutional law has long since outgrown the antiquated notion, expressed in McAuliffe v. Mayor, etc. of City of New Bedford, 155 Mass. 216, 29 N.E. 517 (1892), abrogation recognized in Pereira v. Comm'r of Social Services, 432 Mass. 251, 733 N.E. 2d 112, 117 (2000), that a privilege can be conditioned on the waiver of a fundamental constitutional right such as freedom of speech. See William W. Van Alstyne, The Demise Of the Right-Privilege Distinction in Constitutional Law, 81 Harv. L. Rev.1439 (1968); Richard A. Epstein, Unconstitutional Conditions, State Power and the Limits of Consent, 102 Harv. L. Rev. 4 (1988); Legal Services Corp. v. Velazquez, 531 U.S. 533, 547-48 (2001); Rust v. Sullivan, 500 U.S. 173, 196-200 (1981). Defendants could not condition student office on an undertaking to refrain from outside political activity. They could not condition it on an undertaking never to criticize the principal. And they cannot condition it on an undertaking never to do so in vulgar terms. Nothing in defendants' submissions, therefore, justifies their suppression of Ms. Doninger's First Amendment liberties.

Conclusion

For the above-stated reasons, Amicus urges that Plaintiff's Motion for a Temporary Restraining Order/Preliminary Injunction be granted.

Hartford, Connecticut
August 21, 2007

Respectfully Submitted,

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AMERICAN CIVIL LIBERTIES UNION
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