



VIRGINIA LAW WEEKLY

2017, 2018, & 2019 ABA Law Student Division Best Newspaper Award-Winner

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Governor Demonizes Children

Sai Kulkarni '23
Production Editor

If things have gotten to the point that I, of all the people on this newspaper, have to talk about a serious issue, it has gotten bad. I don't enjoy talking seriously on this paper for the sole reason that it is my escape. I hope to provide that for some of you with my humor. But right now, I am pissed. Straight up pissed. Very few people have seen me genuinely angry, and this subject has elicited that from me. So, now to the point. We are politically divided as a school and as a country. I wish I could say the one thing we can agree on is that protecting school kids should be our first priority. But it has become increasingly clear that this is not the case. This week's proof of this comes from the self-titled "moderate" Governor of Virginia, Glenn Youngkin. In his latest action, he has spit on the progress his predecessor made for no reason but to be cruel.

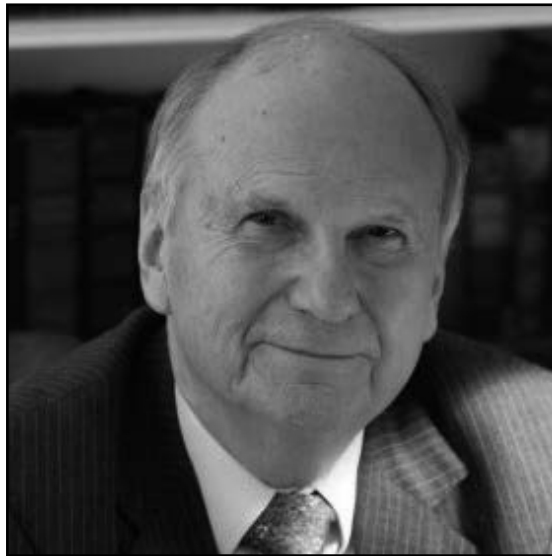
In the latest "Model Policies" from the Virginia Department of Education, Governor Youngkin set clear boundaries.¹ All students must use the locker rooms, restrooms, and facilities of their assigned sex at birth. Teachers are *only* able to refer to students by the pronouns associated with their assigned sex at birth. Legal name and sex can't be changed through parental consent forms, only through a court order. But guess what? Teachers don't have to call students who go through that process by their preferred name if they feel it would violate their "constitutionally protected rights." What absolute bullshit in a policy.

In what world does someone think that legislating or regulating young children's bathroom usage is a good use of their time? Only 5 percent of the adult population is trans or nonbinary.²

1 The main source in this article is the following NPR link. This is not a law review article; I won't cite every claim individually, when most of them come from here. <https://www.npr.org/2022/09/18/1123697784/virginia-transgender-students-public-schools-glenn-youngkin>

2 <https://www.pewresearch.org/fact-tank/2022/06/07/Governor> page 2

Professors Speak on Virginia Constitution and Reform



Pictured: Professors A. E. Dick Howard and Bertrall Ross

Andrew Allard '25
Staff Editor

This past Thursday, September 15, the American Constitution Society held a discussion on Virginia's Constitution and current legal issues, including Supreme Court reform and the independent state legislature doctrine. Held in recognition of Constitution Day, the event was led by UVA Law Professors A. E. Dick Howard and Bertrall Ross.

While Constitution Day commemorates the signing of the federal Constitution, Professors Howard and Ross emphasized the importance of state constitutions in legal activism. "Progressives have ignored state constitutions for far too long," said Professor Ross. Pointing to the rights-forward provisions of Virginia's state Constitution, Professor Ross emphasized that the federal Constitution does not set the ceiling for rights protections. He acknowledged, however, the difficulties of the piecemeal approach that is inherent to a state-focused legal strategy.

Professor Howard, who was Executive Director of the 1971 Virginia Commission on Constitutional Revision, similarly advocated for state constitutions as a source of legal rights. Professor Howard noted that state constitutions can set a higher standard for civil rights than the federal Constitution and are more frequently amended and responsive to democratic preferences. Professor Howard suggested that as the Roberts Court continues to lurch toward the right, state constitutions offer an alternative path for civil rights litigation.

Reflecting on his work for the 1971 Commission, Professor Howard noted the importance of respecting foundational values while modernizing and recognizing the values of the current day. However, Professor Howard highlighted one regret: the inadequacy of voting rights for former felons. Currently, Virginia felons remain barred from voting, even after serving their sentences, unless their voting rights are restored by the governor. In recent years, the Virginia General Assembly has sought to amend its Constitution to automatically restore the voting rights of former felons.¹ However, that effort stalled after Republicans took control of the Virginia House in 2021.

Turning to federal law, Professors Ross and Howard spoke critically of the growth in originalist interpretation of the Constitution. Noting that originalism was first introduced to the American public in the 1980s, Professor Howard suggested that the legal theory is in large part a conservative reaction to the legal teachings of the Warren Court. Professor Howard pointed to the complexity of history and lawyers' propensity for cherry-picking as key flaws in originalist interpretation. Describing the recently decided New York concealed carry case, *New York State Rifle & Pistol Ass'n v. Bruen*,

1 Lavoie, Virginia Governor Restores Voting Rights to 69K Ex-Felons, AP News, March 16, 2021 <https://apnews.com/article/legislature-ralph-northam-us-news-constitutions-voting-rights-d6116a65502227c9c7ea222caf62e068>

Professor Howard remarked that, "On both sides, they are talking originalism, and they come to totally different conclusions."

Professor Ross added that originalism often fails to include recent historical developments in its analysis of the Constitution, particularly where it concerns the rights of communities that were excluded from the decision-making process that led to the adoption of our Constitution. While acknowledging that living constitutionalism "may be a bridge too far," Professor Ross argued that "we need to be responsive to a more recent version of history, rather than the distant past." Citing *Dobbs v. Jackson Women's Health Center* as an example, Professor Ross noted Justice Alito's emphasis on English common law and legal developments of the nineteenth century, from which women were fundamentally excluded.

Speaking from "the hope from [his] heart," Professor Ross supposed that there may be room for movement in the justices' approach to the Constitution. Professor Ross recalled the concerns about a rightward legal shift during the transition from the Warren Court to the Burger Court. While some of those concerns were realized, Professor Ross remarked that the justices ultimately "loosened up" and recognized a need to be responsive to the public. "It becomes clear with threats to [the Court's] legitimacy that it has to be responsive to majority values that evolve over time."

Asked about the need for ACS page 6

around north grounds



Thumbs up to Constitution Day providing free food from FedSoc and ACS. ANG loves getting bribed by both sides like a pair of divorced parents.



Thumbs up to softball getting back in full swing. ANG loves 1Ls being forced outside for at least an hour once a week.



Thumbs sideways to Spirit Week. ANG already wears sweatpants to school everyday, and no one compliments ANG's school spirit.



Thumbs down to Cook Out remaining drive-through only. ANG misses being able to sit inside with a cheap milkshake.



Thumbs up to WMRA starting their fall pledge drive this week. ANG may have gotten a C in nonprofits, but still loves reliable local news.



Thumbs down to inflation. With eggs up 40% from last year, ANG can't crack a raw egg into ANG's daily carrot smoothies on a law student salary.



Thumbs sideways to Bar Review at Rapture last week. ANG hates large crowds (and undergrads) but loves standing on the second floor and gazing down upon ANG's peers like a malevolent god.



Thumbs up to the literal baby riding a horse at King Family Vineyards this weekend. ANG supports Baby Jockey.



Thumbs down to wall-to-wall news coverage of the Queen's funeral while ANG had to find out about Hurricane Fiona from Tik Tok.

Retired Judge: "Due Process Forever"

Anna Brninski '23
Features Editor



On September 15, the Honorable Paul W. Schmidt, a retired immigration judge, gave a talk at the Law School titled "The New Due Process Army." Drawn by both the prospect of insights into how one might upend the current immigration system and the allure of a non-pizza free lunch,¹ a good crowd of students showed up. The talk was sponsored by the Immigration Law Society, the International Refugee Assistance Project's chapter at UVA Law, and the UVA Immigration Law Clinic.

Judge Schmidt, who retired from the bench in 2016, served both on the Arlington, Va., Immigration Court, and as a member of the Board of Immigration Appeals in Falls Church. He is now an adjunct professor at Georgetown Law.²

The talk gave us at UVA a taste of what must be a very lively classroom experience for Judge Schmidt's students at GULC. He started his remarks with complimentary words about the Law School's immigration law facul-

1 Vu Noodles: a crowd-pleaser for sure.

2 This article can't possibly cover everything he talked about; anyone seeking more Judge Schmidt info can get it on his blog, *Immigration Courtside*.

Governor

continued from page 1

Five percent. Does anyone think that this percentage is significantly higher among youth? Governor Youngkin and his cronies really want to demonize this 5 percent? Cis people cannot begin to understand the pain of living in a body that doesn't fit who they are or of complying with rules of gender presentation that are just wrong to them. So, there's internal pain, and there's also external pain. Here's the thing: Kids are already cruel to one another. Bullying is everywhere, and creating in- and out-groups is how we all survived in grade/high school. These kids have it hard enough. Period, end of sentence. They are probably feeling ostracized, and this set of executive actions won't make that any easier.

These kids are so brave to come out before they are out of the home and the K-12 system. They are so strong; certainly stronger than me. My heart hurts for these kids. But do you know what the worst part is? The regulation regarding names. Names are so personal. It is your identity, how you introduce yourself, and part of how you define yourself. And the dumbest part is: None of you, my professors, or ANY of my friends since I was fourteen have called

about-5-of-young-adults-in-the-u-s-say-their-gender-is-different-from-their-sex-assigned-at-birth/

ty, particularly recommending Professor Amanda Frost's 2021 book, *You Are Not American: Citizenship Stripping From Dred Scott to the Dreamers*.

Then, having promised to deliver "the truth, the whole truth, and nothing but the truth . . . as I see it," Judge Schmidt informed attendees that he was "the PowerPoint of this presentation" before embarking on a freewheeling and impassioned speech outlining the shortcomings of the Executive Office for Immigration Review (EOIR) under both the Trump and Biden administrations. He characterized EOIR as a place where "due process . . . legal scholarship, and best practices go to die."

The Trump administration, Judge Schmidt averred, pursued a campaign of dehumanization in order to erode people's rights before the law, with particular effect on migrants, women, children, and people of color. Judge Schmidt also had strong words of criticism for the Department of Justice under Merrick Garland, stating that he had been hopeful for change with the new administration, but that time had not borne out the Biden Campaign's promises of immigration reform. Instead, Judge Schmidt stated that immigration courts remain awash in "continuing nativist nonsense."

An EOIR practice that Judge Schmidt took particular exception to was ADR, or "aimless

me by my legal name. It was so easy; I said, "Actually, I go by Sai" when called on during attendance checks, I introduced myself as Sai, and that's the name I write under. It's so easy, no one even thought twice. To have so many hoops for these kids to go through to get that same recognition from some teachers who have malice in their hearts because these kids are out is ridiculous. And beyond that, they may not even get that recognition after jumping through all of those hoops because it could "violate a teacher's constitutional rights"? Give me a break. Let's be real here—it's so-called religious liberty interests. So, point me to the passage in the Torah, Bible, Qur'an, Gita, or any other holy book where the demonization of children is sanctioned! You can't, because all these holy books preach protection of the innocent.

I'm not trying to get on some religious soapbox here, because I'm not nearly smart enough for that. But at the end of the day, so many of my most religious friends were able to accept a new trans girl in their midst recently, without batting an eye.³ I only wish that these kids get that support, too—now or soon. So much cruelty abound in this policy. Here's the legal argument to tie it to the Law School: This regulation could possibly be disputed under the Virginia

3 And that love is felt every day.



Pictured: The Honorable Paul W. Schmidt during his fiery talk in the Caplin Pavilion on September 15, 2022

docket reshuffling."³ He related woes from immigration attorneys that included immigration courts advancing cases without notifying counsel and scheduling the same attorney for twenty trials in the same month—or for multiple hearings on the same day, in different states, making representation effectively impossible. ADR, Judge Schmidt opined, is "what Garland and the rest of his clueless crew were hired to fix."

Judge Schmidt also stated that EOIR and the Board of Immigration Appeals need new leadership—and new criteria for

3 As someone whose immediate association with the acronym ADR is Alternative Dispute Resolution, I suffered brief but substantial confusion.

Human Rights Act. There is a public comment period that will become available later this month.⁴ But all of that is not my point here. I am focused on the fact that this policy exists in the first place. I have seen in the last month that people in this state, including devout conservatives, have been able to accept a newly out trans person in their midst without losing a step. My only hope is that by shining a light on this issue here in Virginia, there can be some degree of understanding about the hundreds of miles left to be tread on the issue. It's policies like this that will keep more kids in the closet for longer. And it helps no one for a kid to be hiding who they truly are for ten or more years before they let themselves be free.

4 Found here: <https://town-hall.virginia.gov/L/Forums.cfm>.

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selecting immigration judges. The lack of consistent due process protection for people going through immigration court proceedings particularly troubled him. "Due process in immigration court is whatever is expedient on any given day," he stated. Judge Schmidt also advocated for a coherent ethos of civil rights advocacy that looks at systemic mistreatment and draws connections between, for example, the disenfranchisement of Black voters in the South and the failure of the immigration system to adequately serve Haitian refugees.

Judge Schmidt ended his prepared remarks with the rallying cry, "Due process forever!" and then took questions from the audience.

One listener asked for tips on how to build credibility in asylum cases, when the applicant may not have initially supplied details or, affected by trauma, may have made conflicting statements. Judge Schmidt recommended gathering as much external documentation as possible, such as police reports or data on country conditions, and, if appropriate, to seek a PTSD diagnosis. "Don't wait for cross-examination," he advised; rather, counsel would do well to immediately address any discrepancies. He also noted that an immigration judge is generally obliged to consider the record as a whole, so a good array of supporting evidence can ameliorate the effect of confusion in prior statements by the appli-

cant.

Judge Schmidt also noted that if immigration judges have been to border facilities at all, they have probably only experienced a very sanitized tour. Errors in paperwork by border officials are common, and there's data available on that fact that an attorney may wish to get on record if the original paperwork is what's causing the discrepancy—it helps to show that government record-keeping, not the applicant, is to blame.

Other practice tips include finding out as much as possible about the judge in a case (are there particular groups for whom he or she has a soft spot?) and making as complete a record as possible from which to appeal, if necessary.

In response to a question about what guaranteed access to counsel in immigration proceedings might look like, Judge Schmidt lamented the "gonzo scheduling system" and lack of coordination that prevent pro bono efforts from filling that gap, but he spoke hopefully about efforts to train non-lawyers to serve as accredited representatives. Judge Schmidt proposed that retired professors would be an excellent population to tap into. "Who better to put together some of these cases that depend on country conditions or making people understand history or country conditions? [There's] a lot of cultural anthropology in presenting immigration cases."

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Absolutely Brilliant: 2L Makes Joke About Adverse Possession, 1L Starstruck

Jonathan Peterson '23
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If you know the UVA Law community, then you know that we're a funny and fun-loving bunch of people. Humor abounds in each and every corner of the school, and, even during finals, raucous laughter and the sounds of merriment can be heard echoing down our long halls. Picture a sort of Tolkien-esque elvish festival and, yup, you've got it; that's the Law School.

And, as anybody who is anyone knows, there's nothing that gets the Law School going like a good joke about the law. Truly, these are the height of comedy. Ask someone whether they'd like more or fewer jokes about the law and they will inevitably answer with, "more, give me more, I need more." Which is why this recent news is so groundbreaking.

Rumor has it that an unnamed 2L dropped an *absolute firecracker* of a quip about adverse possession this Thursday, September 8 at Sunset Series. Those who were around to hear it unanimously report not being able to repeat the joke because they "wouldn't do it justice." However, inside

sources say the joke apparently was loosely related to squatter's rights and a table on the Carter Mountain lawn area that a group of townies had just left their jackets on. Original, yet relatable.

According to the 1Ls in the vicinity, the girl who cracked the knee-slapper is "so cool" and "probably SCOTUS-bound, if she knows so much about the law." Others were heard asking if the now-famous genius of a 2L had any Torts outlines for their professor and, more importantly, whether she had a significant other. That's right folks, you heard it here first: 1Ls think jokes about the law are hot.

So, if you're looking for a good way to impress that new group of friends, whip out a wisecrack about the law and you'll be sure to turn some heads. A good gag about intentionally inflicted emotional distress is sure to kill ten times out of ten. And, hey, who knows, it might even work on your friends who have nothing to do with the law. After you finish the ten-minute explanation referencing two Scalia dissents, of course. Whoever said "brevity is the soul of wit" clearly knew nothing of the law.

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Ranking 1L Section Softball Team Names

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What's in a name? Well, if it's the name of a 1L section softball team, ideally the following: (1) a legal (or generally law-adjacent) pun, (2) a softball/sports pun, and (3) use of the section's letter. These are the primary criteria that I will be using to rank the names of the 1L (and LL.M.) section softball teams. However, because these are Law School softball teams—and as we all know, there's nothing the law loves more than being unnecessarily complicated—I will also be factoring in more subjective criteria, like (4) creativity and (5) "team naminess"¹ (basically, how closely the team's name follows the traditional sports team naming format of "The [Noun]s" or, if you really want to get wild, "The [Adjective/Adverb] [Noun]s").² Now, let's get into the rankings.

1 The law also loves using made-up terms that no one else understands.

2 The Rule 12(b)ombers (2L § B's team) and the Founding Fielders (3L § F) are perfect examples of section team names that meet all of these criteria, and quite frankly, this year's 1Ls/LL.M.s are lucky they don't have to compete against them.

First: Habeas Scoreplus (Section H)

Congratulations to Section H, winners of Dandelion and this team name ranking system! The name's lack of emphasis on the section letter—as well as its use of a general sports pun rather than a softball-specific pun—can be overlooked, thanks to the name's creativity and incorporation of a legal concept that the Section H students don't even understand yet.³

Second: Aiding and Abatting (Section A)

Other than Section H, Section A was somehow the only team to include both a legal pun and a softball/sports pun in its name, so I'm giving them extra points for that. Section A did lose points on team naminess, but they managed to score some of those back with their use of section letter alliteration.

Third (tied): BarBarians (Section B) & Cold Callers (Section C)

This one was tough. Sections B and C succeeded together (legal puns, team naminess, emphasis on section letter), but they also failed together (lack of softball puns). BarBarians felt

3 In fairness, it's unclear how well the courts understand the concept, either.

slightly more creative, but Cold Callers would definitely strike more fear into my heart if I were an opponent. Ultimately, neither name was able to gain a sizable edge over the other, so the teams get to share the last spot on the 1L Section Softball Team Name podium instead.

Fifth: LLM NFTeam (LL.M.s)

"NFTeam" isn't *really* a softball or sports pun, but I'll give it to the LL.M.s on this one, since it is still sports related. On the other hand, the legal puns are lacking, and I instinctively don't like NFTs, so fifth place it is.

Sixth: Tortellini-e (Section E)

This one is getting ranked lower than it probably should for a couple of reasons. First of all, "tortellini" is spelled with two l's.⁴ Second of all: Tortellini. It's right there. Just capitalize that E and you both make your tort pun clearer *and* avoid having to add the "e" at the end of a word that already ends in a long e sound. If you want to keep the hyphen usage, "Tort-e-llini" also works. Just something to keep in mind for the spring semester.

Seventh: I's on the Ball (Section I)

4 If this was supposed to be a "one l"/1L pun, it didn't work.

While this team's name isn't necessarily the most creative, it does utilize both the section's letter and a solid softball pun, and you could make the name follow the traditional team-name format if you *really* wanted to.

Eighth: Public InDency (Section D)

I'll be honest, this team never stood a chance. How could you, when the section team that preceded you by two years was named "Deez Nuts"? Obviously, this isn't 1L Section D's fault, and I'll admit that it's unfair for me to rate them against their predecessor when I'm not doing the same for the other 1L teams. But come on. Deez Nuts.

Ninth: F for Final Judgment (Section F)

It doesn't have a softball pun, and it's not particularly team name-y, but it does use both the section's letter and legal terminology to create an appropriately dramatic and fear-inspiring team name that would've ranked higher if not for the arbitrary criteria that I outlined at the beginning of this article.

Tenth: Guilty as Charged (Section G)

Section G's team name suffers from the same issue that Section H's does in that while the section letter

is used, it isn't really emphasized. Unlike Section H, its scores on the other criteria don't do enough to overcome the problem. Overall, it's not a bad name, but it's not spectacular, either.

Eleventh: J's and Confused (Section J)

Use of the section letter is there, as is a softball pun—kind of, if you squint a little (or a lot). *Dazed and Confused* has a baseball scene, so I guess that kind of counts?

To close out this first edition of the annual 1L Section Softball Team Name Rankings,⁵ I would like to state that regardless of what these rankings might seem to say, all of the sections named their softball teams well, and I appreciate the cleverness that went into each name. With that being said, now is the time for all the non-Section H 1Ls (and LL.M.s) to use their rage from losing to Section H—again—as fuel to propel them towards 1L Softball Tournament victory. Play ball.

5 I don't know if this will actually be an annual thing, but it sounds cool to say.

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Which Niche Area of the Law School Are You, Based on Your Zodiac Sign?

Julia D'Rozario '24
New Media Editor



It may go without saying that a passion for the study of law does not often mix with a passion for astrology. Having failed to find fellow law students to talk astrology with, I have now decided to abuse my position on the *Law Weekly* to inflict poorly researched zodiac content on the School. Please enjoy my woefully uninformed, deeply biased analysis on a question no one wants the answer to: Which niche area of the Law School are you, based on your zodiac sign?

Gemini (5/21 – 6/21)

The Microwave Corner

Before this became an astrology article, it was a "places in the Law School with very specific energy" article. My boyfriend suggested "the little microwave area" because, and I quote, "I feel like I'm being held captive when someone asks me how my summer went and I still have fifty seconds left on my burrito." I think we have all had this experience at the Law School microwaves . . . and we have all had this experience with a Gemini. Geminis are the social butterflies of the zodiac. You are fun, outgoing, and friendly, and your extroverted nature means that—like the microwave corner—it is easy for you to start

conversations. Also like the microwave corner, your propensity for small talk may take innocent burrito-warmers hostage.

Cancer (6/22 – 7/22)

The Meditation Room

The meditation room is the single most comforting place in the Law School, and you are the single most comforting sign in the zodiac. Cancers are known for being nurturing, intuitive, and emotional. Much like the beloved meditation room, you are a safe space for others and have an almost supernatural ability to soothe people with your energy. Also, I actively seek you out and unload my emotional turmoil on you at the slightest inconvenience.

Leo (7/23 – 8/22)

Specifically the Front Couches in ScoCo

The ScoCo front couches are always either pleasantly bustling and social, or overly noisy and overwhelming. Hit or miss. Leos are known for being confident and theatrical—for their innate ability to command attention. Like the ScoCo front couches, you are the center of attention, and you can sometimes be boisterous. You can also be hit or miss. Some of my best friends (and the best people I know) are Leos. An equal number of my mortal enemies¹ are Leos. You are either one of

1 Yes, I have mortal enemies.

the friendliest, funniest, warmest people in the universe, or I actively fear you. There is no in between.

Virgo (8/23 – 9/22)

The Gunner Pit

When I told my Virgo friend about this article, she immediately stated, "The Gunner Pit is Virgo. I'm saying this because I know." Virgos are known for being diligent, organized, and logical. Just like the Gunner Pit, you are beautiful and incredibly smart. You also happen to account for roughly 80 percent of the romantic anguish I have experienced in my life, so I will continue to avoid² you like my life depends on it (again, just like the Gunner Pit).

Libra (9/23 – 10/22)

The Murals

Many haven't noticed this—I didn't until recently—but the Law School actually has a collection of murals: replicas of the famous Clark Hall murals on Main Grounds.³ As well as being beautiful, the murals tell a compelling story. Libra, you are known for being a lover of beauty. You gravitate to all things picturesque and tend to

2 I went cold turkey off Virgos almost two years ago...

3 For information on the history of the murals, read, *Seven Wonders of the Law School: Clark Hall*, by Monica Sandu '24.

wards aesthetics more than any other sign in the zodiac. Like the mural space (and Oscar Wilde), you understand that beauty is a form of genius.

Scorpio (10/23 – 11/21)

The Slaughter Hall Connector Room

If you're asking, "what connector room?" you've come upon the very reason that this is a Scorpio space. To answer your question, there is a small, dark, soundproof room in the middle of Slaughter Hall, which inexplicably has windows looking into all the surrounding classrooms. Scorpions are often known for being mysterious, secretive, and observant. Much like the connector room, you are curious and mystifying to others. You are also probably watchful to the point of giving people the creeps.⁴

Sagittarius (11/22 – 12/21)

The Basement

Sagittarians are known for being adventurous, independent, and energetic. But that's not what I'm basing this on. I have been to the basement exactly one time, and it was enough. I felt like I was in *A Quiet Place*. The corridors were long and narrow, it was weirdly dark, and the lights were flickering. I don't

4 Not me though—as a Scorpio myself, and an avid people-watcher, I condone connector room behavior.

know if the basement is usually like that or if I just went on an off day, but I will not be going back . . . with Sagittarius, like the basement, I am basing my entire assessment on one bad experience.⁵ I will be choosing to ignore all your positive traits because of one really terrible Sagittarius I knew. Like, bad enough that he tainted the entire zodiac sign. Like the basement hallways, you might lead me to my ultimate doom, or you might not. I won't be getting close enough to find out.

Capricorn (12/22 – 1/19)

Third Floor of the Library

Capricorns are the hard workers of the zodiac, and are responsible and ambitious. For this reason, you are the third floor of the library. More so than any other study space in the School—including the Gunner Pit—the third floor of the library strikes me as a truly scholarly and intellectual place. Your work ethic is something to revere, and, like the third floor, intimidates the hell out of me.

Aquarius (1/20 – 2/18)

The Tiny Door

Those of you who have been reading the *Law Weekly* for a while will know that we, as a newspaper, are obsessed with

5 You were promised bias at the start of this article!

LAW WEEKLY FEATURE: Court of Petty Appeals

The Court of Petty Appeals is the highest appellate jurisdiction court at UVA Law. The Court has the power to review any and all decisions, conflicts, and disputes that arise involving, either directly, indirectly, or tangentially, the Law School or its students. The Court comprises eight associate justices and one Chief Justice. Opinions shall be released periodically and only in the official court reporter: the Virginia Law Weekly. Please email a brief summary of any and all conflicts to dl9uh@virginia.edu

Readers of the Virginia Law Weekly

v.

Virginia Law Weekly
75 U.Va 4 (2022)

WALSH, J., delivers the opinion of the court, in which LAKE, C.J., BNINSKI, J., MORSE, J., REYNA, J., BROWN, J., and D'ROZARIO, J. join.

PETERSON, J. CONCURS.

KULKARNI, J. took no part in this case.

Walsh, J. delivered the opinion of the Court.

Background

The case before us today comes by way of a somewhat unique set of circumstances. Plaintiffs in this matter—the numerous readers of the greatly renowned and widely beloved *Virginia Law Weekly*—did not originally intend on bringing forth this lawsuit. However, they stated in their original complaint that they felt compelled to do so by an article appearing in last week's issue of the *Law Weekly*. Specifically, they cited “Yet Another Sunset Series Review,” in which the article's author declared, “I can be lazy and redo old articles.”¹ The article then asked, “What are you going to do, sue me?”² Plaintiffs answered in the affirmative,³ immediately filing a complaint alleging breach of contract in the District Court of Petty Complaints, with the writer of the article and the *Law Weekly* named as the individual defendant and the institutional defendant, respectively. The district court dismissed the complaint, finding that nothing in the *Law*

Weekly's history of “journalism” even *hinted* at the creation of an expectation that the newspaper would provide its readers with new, entertaining, or informative articles. The court reasoned that because no such expectation had been created (and thus no implicit promise made), there was no contract that would have been breached by Defendants' behavior. The Circuit Court of Petty Problems agreed and upheld the dismissal, and Plaintiffs appealed the decision to this Court. We disagree with the lower courts and

Additionally, although the Court finds that Plaintiffs' provision of attention and recognition confers a great benefit upon the *Law Weekly* and its staff, we also find that such performance by the readers was not used to induce the newspaper to provide its readers with the novel, original journalism that Plaintiffs claim was promised to them. This fact is indicated by the paper's historic lack of novel, original journalism. Because performance by the readers was not used to induce performance by the *Law Weekly*, it is clear that there was

freely admit to doing *in said newspaper*, don't be surprised when there are consequences.⁶ For years, the *Law Weekly* has repeated article ideas, and it has even reprinted full articles and opinions when it has run out of content. Did you see any complaints filed in any of the petty courts when the paper did this? No, of course you didn't, because no one cared. It's like committing white collar crime: Plenty of people do it and get away with it, so long as they just don't brag about it.⁷ But nooooo, a *Law Weekly* writer just *had* to run

of justice for the individual defendant to escape from this case unscathed and without having to answer for her actions.

Conclusion

Contract remedies may not be punitive, but this Court sure is. While the Court concludes that the *Virginia Law Weekly* is entirely blameless in this matter, the author of the instigating article is not, and she must face consequences. As punishment for flaunting the rules of basic authorial integrity and decency, and for creating more work for the Court—work which required the Court to think about Contracts, a subject that the author of this opinion hadn't even touched since 1L—the individual defendant is hereby permanently enjoined from writing articles between the hours of 12 a.m. and 7 a.m.⁸ and from name-dropping more than two friends per article (including footnotes).⁹

It is so ordered.

⁸ See Kulkarni, *supra* note 1, n.5.

⁹ See, e.g., Sai Kulkarni, *Staying Well Fed in CVille: Late Night Haunts*, Va. L. Wkly., Apr. 6, 2022, at 6; Sai Kulkarni, *Managing Mental Health in Spring Semester*, Va. L. Wkly., Mar. 16, 2022, at 3; Sai Kulkarni, *Florida Man Does Ski Trip*, Va. L. Wkly., Jan. 26, 2022, at 1. You get the gist.

COPA page 5

“If you're going to taunt readers...into suing you for something you freely admit to doing...don't be surprised when there are consequences.”

instead find in favor of the plaintiffs.

Analysis

Plaintiffs argue that by “redo[ing] old articles,” the defendants breached a contract—implicitly created by the *Law Weekly's* publications over its many years of existence—to provide its readers with novel, original journalism. They further argue that in return for this journalism, readers of the newspaper provide the *Law Weekly* and its writers with the attention and recognition that all law students inherently crave. As a remedy for this breach of contract, Plaintiffs seek punitive damages, contending that what they have lost is not just the ability to read articles based on original ideas, but also their faith in the journalistic process and free press itself.

In addressing these assertions, the Court would first like to remind Plaintiffs that contract remedies are not punitive.⁴

no bargaining between the parties, no consideration, and ultimately, no contract.

While this conclusion would ordinarily demand that this Court uphold the lower courts' dismissals of Plaintiffs' claim, observers of this Court should know by now that that's not how this shit works. As stated in the First Petty Rule of Civil Procedure, here in the Court of Petty Appeals, “[w]e do what we want.”⁵ Rather than dismissing the plaintiffs' complaint for such a trivial problem as not stating an actual claim, the Court instead finds for Plaintiffs on the basis of a new rule—one which applies to all issues of pettiness, regardless of their merit: Be careful what you wish for.

As it applies to the present case, this new rule simply means that if you're going to taunt readers of a newspaper into suing you for something that you

F.2d 1044 (2d Cir. 1989). But wouldn't it be fun if they were?

⁵ *Law Weekly v. CoPA Copiers*, 369 U.Va. 96 (2019).

¹ Sai Kulkarni, *Yet Another Sunset Series Review*, Va. L. Wkly., Sept. 14, 2022, at 5.

² *Id.*

³ Specifically, they answered, “Bet.”

⁴ See *U.S. Naval Inst. v. Charter Commc'ns, Inc.*, 875

her mouth and essentially challenge her readers into bringing this case. In doing so, that defendant created more work for this Court to perform, and *that* is completely unforgivable. It would go against the very notion

⁶ For another application of this rule, see Thomas J. Prohaska, *Stabbing victim's last words to killer: “Stab Me,”* Buffalo News (Jan. 11, 2014), https://buffalonews.com/news/local/crime-and-courts/stabbing-victim-s-last-words-to-killer-stab-me/article_1ef97eb3-3a2a-57c9-bb4b-9352c5814810.html.

⁷ Don't quote me on that.

Faculty Quotes

R. Harmon: “The whole East Coast, I mean... a bunch of druggies!”

B. Porter: “I have litigator friends who say [these clauses] are important but I'm skeptical.”

F. Schauer: “It doesn't require any specialized knowledge to show up to work drunk. Trust me on this one.”

B. Sachs: <Conducts a dramatic performance of a father looking for information on his dead daughter>

C. Barzun: “Do you know what ‘moonin’ means?”

Heard a good professor quote? Email us at editor@lawweekly.org

Cartoon

Created by Monica Sandu '24



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Sports Editor

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COPA

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Peterson, J., concurring.

I write separately today, as Justice Thomas has done so many times, to underscore one particular point. Fear not: I'm not talking about the Privileges and Immunities Clause. Instead, I write to emphasize that attempts to impose liability rules relating to the quality of the *Law Weekly's* work must be smote by the heavy and just hand of this Court. Parties claiming the paper must deliver "novel, original journalism" have no place here. Imposing such rules on the beleaguered, understaffed, and simply unfunny journalists who make up the *Law Weekly* would threaten crushing liability. Like *The Lord of the Rings'* Gollum, and like Copeley Field's ANG, the *Law Weekly* has a role to play—a *raison d'être*.

In sum—I write to chastise Plaintiffs for presenting their argument in the manner they did. It is unbecoming of this Court to consider arguments which purport to impose standards upon the Court. We, the justices, make the rules. And, while Sai deserves all of the sanctions aimed at her today, I refuse to entertain any claim that there is a principled way of making these decisions outside of pure, unfettered, judicial discretion. Accordingly, I concur.

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Counsel's Counsel

Counsel's Counsel is the world's preeminent advice column for law students. Written by recent UVA Law graduate, Jane Doe, J.D.

Question:

Hi Jane! Last week, I told my friend (let's call him Joker) about a short course that I was interested in. I told Joker there were only two open seats left. I asked him if I should take it, and he said it sounded exciting. The next day, I went to sign up, but the class was full. Turns out, Joker and a mutual friend (let's call him Batman) took the last two seats!

I don't fault Batman, because I didn't tell him about my interest in the class. Besides, when Batman found out what had happened, he dropped the class so that I could take it. I'm confused by Batman because he insisted I take the class, even though he didn't cause the situation. I felt bad and tried convincing him to stay, explaining that we could get Joker to drop it. Batman said it wasn't worth it.

I'm irritated with Joker. Why would someone who resented himself as my friend do this? I'm surprised this happened at UVA. This feels like a Columbia story.

What's more, now I'm in the same working group as Joker. We have to do two class presentations together. I kind of expect an apology from him. I feel like working together will be awkward if he doesn't. At the same time, I don't want to ask for an apology. What should I do? - Mildly Miffed

Answer:

Dear Mildly Miffed, wow, that is annoying. While Joker's move is certifiably uncool, you really set yourself up for that one. You told Joker about an opportunity, and he took it. Your letter reads like a Contracts fact pattern.

It seems you believed claims that UVA Law is comparatively more friendly than other top schools. First of all, praising UVA's social dynamics is unverifiable puffery. It was unreasonable for you to rely on it. Everybody knows the collegiality thing has its limits. For example, UVA Law's characteristic "collegiality" is no match for theoretically low-stakes sports competitions.

Second, to the extent that UVA Law actually is friendlier than other schools, law students are still self-interested. In business deals, everyone wants to work together—until it becomes advantageous to screw over your business partners. Professors might call this *efficient breach*. Here, Joker purported to be your friend until it conflicted with his interests. There was no actual agreement, so Joker technically owes you nothing.

Yet, Joker's conduct was an intentional affront to your academic enjoyment and, implicitly, your social standing in the Law School. Batman dropped the class rather than

convincing Joker to drop it because he views Joker as the alpha, not you. As far as Joker is concerned, he is on top.

In law, your reputation is everything. And you should be your biggest advocate. Don't let Joker walk all over you. People in the legal profession respond to strength. You should retaliate.

You said you expect an apology from Joker. Are you insane? Your colleagues are argumentative, prideful, and entitled competitors who, for the most part, will devote their lives to advancing the interests of those already in power. Don't get apologies; get even.

You must ensure that Joker stays in the class. It's a great place to play mind games. Sit behind him in class to make him feel watched. He knows what he did, and he knows that you know. Let him sit in it. Whenever you see him, greet him in a way that you don't greet anyone. A cold, expressionless "Howdy" would get the job done.

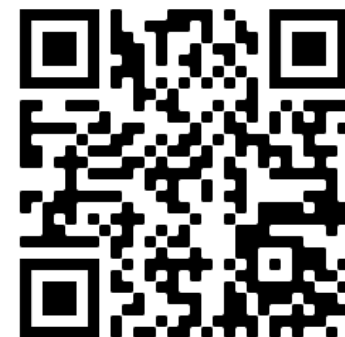
Besides that, dominate him in class, but do it subtly. Don't view the presentations you have to do together as sources of discomfort, but rather as opportunities for vengeance.

Become a master on Joker's share of the presentations. I recognize that your time is limited, so you may need to neglect your other responsi-

bilities to do this. Whenever Joker speaks, add nuances he doesn't expect. Reading your professor's publications will help with this. Use sentences that start with phrases like "To clarify what Joker is getting at" to undermine him implicitly.

These tactics should operate at a subconscious level. If they're executed correctly, you will leave Joker impressed with your intellect. Your professor and peers will view you as the alpha. The goal is to make Joker regret ever thinking that he could disrespect you and get away with it. Best of luck with your studies! - Jane

For a serious response to your serious inquiry, please access the anonymous submission form using the QR code below.



HOT BENCH



Cam Moody '25

Interviewed by Ethan Brown '25

Hey, sectionmate! Give me the fifteen-second spiel we've all given 100 times since orientation a few weeks ago: Where did you go to undergrad, and when did you graduate?

Hi, Ethan! I graduated from Virginia Commonwealth University in Richmond in 2014, with a bachelor's degree in Biology.

Amazing, we love a STEM icon. Tell me what you got up to in the eight years in between graduating from VCU and starting at UVA Law.

So, I graduated from VCU with the intention to work at a paper-packaging company that made six-packs for soda and paperboard. I also did forestry in high school and studied forest ecology in college, so I hoped to pursue something similar after graduating. But the paper com-

pany actually sold all their forestlands, which prompted a bit of existential panic on my end. So, in lieu of forestry work, I pivoted to their environmental auditing team, where I examined relevant statutes, regulations, and permits that each facility had to follow. Essentially, I got an excuse to do fun stuff, like climbing on equipment and looking in trash cans, as part of ensuring that each facility was properly complying with state law.

Sounds like you made the best of a pretty sudden change in plans! And my old workplace looks much less fun by comparison, because it was tragically devoid of furniture-climbing. What did you do after that position?

After working two years at the paper company, I worked at a large utility company for six years. I'd been in that role for a while when the pandemic started, and by that point, I felt some soul-searching was in order. I'm trans, and I increasingly had the sense that I needed to be in a place—a different place—where I would be comfortable being myself. I considered what I was good at, and pretty early on in the process of investigating other academic opportunities, I settled on applying to law school.

Hooray for career shifts, and hooray for coming somewhere you feel safer and happier being yourself. How are you adjusting to 1L?

I'm enjoying it! We're only four weeks in, and I'm already excited to try so much during my time here. Like I said earlier,

environmental work fell into my lap after VCU, so I'm eager to explore other things (perhaps opportunities where I can use my Patent Bar eligibility). I'm also very interested in joining Lambda and PILA.

What's your favorite class so far?

Contracts with Professor Mitu Gulati! We've had some incredible guest speakers so far and the class is refreshingly conversational.

I agree, as a fellow Mitu stan. Getting outside the Law School, what are your favorite Charlottesville haunts so far?

I love Walnut Creek Park, which has a beautiful lake, and it's only a twenty minute drive from Downtown. I also feel obligated to shout out Greenberry's, both the Emmet Street and Law School locations. I've also enjoyed the farmer's market and various other community events.

Finally, you're in Section H, which won Dandelion this year with its rendition of "... Baby One More Time," by the Princess of Pop herself, Britney Spears. I understand you have a special connection to her.

Yes—the song we performed at Dandelion was on the first CD I ever purchased for myself in 1999. I also bought an NSYNC album the same day. I don't think I would have ever foreseen dancing to it at a professional school event twenty-three years later, but the world unfolds in mysterious ways.

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Barristers United Match Report September 18, 2022

Jack Brown '23
Sports Editor



Barristers United roared into action early Sunday morning against the enigmatically named ENNSA, looking to build on last week's momentum to pick up a second win this season. With the squad disappointingly without a JMU alum in the starting lineup for the first time this season, there were concerns the team might once again have trouble taking advantage of their chances. These concerns, like fears that not reading the footnotes will impact your final grade, turned out to be comically wrong.

A commanding 7-0 win is sure to silence the media talking heads who believe that the Barristers dynasty can never return after last year's championship loss. But pressure makes diamonds, and this team has an engagement with destiny that they need a ring for.

The 1L class continued to impress, with two more goals coming in debuts for the Class of 2025. James Pierpoint '25 showed incredible poise as he opened his Barristers account with a goal of pure finesse, while his fellow common-law scholar, Carter Rothman '25, scored a Barristers set piece goal, showing that class doesn't have a credit requirement.

Not to miss out on yet an-

other fun Law School event, the Class of 2023 managed to get on the score sheet, thanks to a goal from Barristers legend, Mustapha Yoosuf-Akinlaja '23, who continues to prove that our class can be relevant, despite the damage that our first year did to us. Chris Hamborsky '23 also continued to impress with a beautiful assist, demonstrating the wisdom of heavy investment in the Barristers academy system.

But, at the end of the day, the true star of the show was the Class of 2024, who had four goals and continued to show a borderline irresponsible level of passion for Sunday League soccer. Nathan Sheeley '24 physically dominated the other side as he scored a vigorous solo goal to put the game out of reach. And the final three Barristers goals all belonged to the eternally youthful and speedy Drew Flanagan '24, who annihilated ENNSA with a glorious hat trick that will live rent-free in their defenders' heads for months to come.

Overall, the game was a brilliant return to form for a reloaded Barristers squad that aims to prove that UVA is no longer just a softball school. Tune in next week as they take on the inaccurately named "Champion" FC, for what is sure to be a thrilling match at Charlottesville High School.

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For the 5th Decade in a Row, We Ask: Why Softball?

Jack Brown '23
Sports Editor



If you've been on a tour of the Law School, you are guaranteed to have heard about a few things. Of course, there are mentions of "collegiality," mentions of how much great hiking there is around Charlottesville, and guarantees that if you come here, OPP will find you a firm job (though it might be in Wilmington). But more than any of these staples, you will hear about softball and how much it means to the social scene at UVA.

The first question you might be asking is, "Why?" Why is this antiquated game seemingly as mandatory for UVA Law students as cold calls or having to explain to your parents that UVA is actually ranked higher than Georgetown and Cornell? Why do I have to deal with a barrage of enthusiastic GroupMe messages about our game against Section Whatever? Why should I play?

There is a reason softball has endured for over forty years, despite the clear danger the game poses for unathletic law students and innocent passersby at Copeley. It can inspire section

pride, give anyone a chance at glory, and let you enjoy what the American Meteorological Society considers the best weather on the east coast.

You should like the message in your GroupMe to RSVP for softball because—no matter what your level of athleticism, experience, or understanding of the rules—you can have fun. From the cleanup hitter to the fan trying to wrap their head around the infield fly rule, everyone can enjoy the game. Every time someone steps up to the plate, you get a chance to see them become a hero. No matter who they are, when they step into the batter's box, they have a chance for glory. The general lack of athleticism amongst law students means that any contact with the ball can lead to a runner making it to first. You will hear no louder cheer than that of a section when their classmate, who apologizes to everyone for not being good as they step up to the plate, discovers their hidden talent and whacks that baby past the try-hard shortstop. And if you miss? No one will care; they'll support you for giving it a try.¹

1 And if people don't cheer for you, they're toxic, and that's good to discover early on.

"What about when I'm not at the plate?" some of you might ask, your voice doused in suspicion. Well, then you get the most fun part of softball: tastefully mocking the other team with your friends behind you. The most common complaint about softball and baseball is that the games are too boring for our generation's ADHD-addled mind. That it, like recusals by Supreme Court justices, is something for a bygone era. But it is this slow pace that makes it perfect for Law School. Whether you bring your books, dog, or chess set,² you don't have to hyperfocus on the game to get a sense of what is going on. Outside of Bar Review, it really is the best way to get to know people in and outside of your section.

As you progress in your legal career and meet more attorneys who went to UVA Law, inevitably, many of them will monologue about their own moments of softball glory. While it may be painful to patiently stand there as a partner goes on about his legendary hit to win the 1978 championship, you will be struck by how much those memories mean to an otherwise soulless man. You might even see him smile for the only

2 If you are a huge nerd.

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time when he thinks back to whatever law-related pun his team was called. These UVA Law alumni will rattle off the names of their teammates and shift to talking about how much they miss seeing their friends each week. Softball sticks with people not only for what actually happens on the field, but also because of who they played with and against.

Law School is tough, and 1L is the hardest part of it all. At points, doctrinal classes will feel all-consuming, and it can feel impossible to think about anything other than The Law. It's the friends you make at UVA that make it a little bit bearable—the connections that will help you survive those terrifying exams and will make you one day (I promise) nostalgic for your time at UVA. Softball can be the start of so many friendships. It gives you something to talk about before Contracts, can introduce you to people outside of your section, and can keep your section in touch with one another after this first year. At the end of the day, the only way to lose at softball is to not give it a try.

ACS

continued from page 1

court reform, Professor Ross acknowledged that the Court was never designed to be democratic but suggested that the Court has been distorted by recent disruptions to the nomination process. Professor Ross suggested adopting an eighteen-year term limit for justices to create greater consistency in the timing of judicial appointments and to promote greater accord between the values of the Court and the public.

Professor Ross also addressed the upcoming Supreme Court case, *Moore v. Harper*, which will present the case for the independent state legislature doctrine. The case, brought by the North Carolina legislature, contends that the federal Constitution's Elections Clause (Article I, § 4) prevents state judicial review of election laws. Professor Ross noted that courts have never interpreted this clause to have this meaning and that "taking away judicial review in any area of the law opens the door to abuse." While Professor Howard suggested that the recently created Virginia Redistricting Commission may survive adoption of the independent state legislature doctrine, he finished by saying, "If you take one thing away from this discussion, do not make cash bets on what the Supreme Court will do."

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Zodiac

continued from page 3

the tiny, unexplained door in the second-floor hallway. Aquarians are known for being eccentric, rebellious, and unique. You aren't concerned with what "standard" doors are "supposed" to look like . . . as an Aquarius, you keep people on their toes by being unpredictable. Just like our beloved tiny door, you play by your own rules. Unlike the tiny door, which is tiny and door-shaped, you are—to quote our Editor-in-Chief—a "human person of predictable proportions."⁶

Pisces (2/19 – 3/20)

The Telephone Booth

For anyone who isn't aware, there is a tiny room in the library designated as the "phone room." It's about six square feet in area. Picture Bender's house in *Futurama*. It is absolutely empty, save for a call-for-help button, and is forbidden from having any furniture. In fact, let me take back my classification of it as a "room": It is quite literally a closet. Considering the fact that it is directly next to the MyLab "cell phone zone," which has tea, snacks, and sofas, I don't know anyone who has ever opted to take a call in the closet. I do, however, know people⁷ who have slipped in there to have a quick finals week cry or to scream softly without alarming their peers. Pisces, you are

known for being sensitive and in tune with your feelings. You are not one to deny yourself your emotional needs. Like the telephone booth, you cry when you need to cry, you scream when you need to scream, and your emotional balance is better for it.

Aries (3/21 – 4/19)

McGuireWoods Corner

McGuireWoods Corner is a corner. Quite literally. It is an ordinary corner wall near the bookstore's entrance, which, for unknowable reasons, has been sponsored and is labeled "McGuireWoods Corner." Aries, you are strong-willed and self-assertive. You have a strong sense of identity and know yourself better than most people. Like McGuireWoods Corner, which, I cannot emphasize enough, is literally a corner, you're not afraid to tell the world exactly who you are.

Taurus (4/20 – 5/20)

Home

Let's be real, you're not at school unless you absolutely have to be. Tauruses are known for essentially being the personification of a fuzzy blanket. You crave relaxation and warmth, and you feel the best when you are cuddled up in bed, at home, with a good movie and some good snacks. If, by any chance, you ARE at school outside of class, you're probably at the Student Affairs office, acquiring Cheez-Its.

6 See Ode to Tiny Door in the Second Floor Hallway, published exactly 364 days ago by our EIC, Dana Lake '23.

7 Read: me.

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