



VIRGINIA LAW WEEKLY

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

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November Is Here, It's Time to Get Your Act Together

Dana Lake '23
Editor-in-Chief

There is no time of reckoning quite like November. The fall is a busy time for socializing and professional networking, but hard deadlines are few and far between. “Oh, I’ll deal with that in November” is a common refrain across class years. Outlining, bar registration, job apps, the MPRE... nothing you need to worry about happens early in the semester. All is calm in August and September, with only the vague gathering of dark clouds on the horizon. The chill of October air might bring up reminders of those future problems, but you are still comfortably on the right side of Halloween.

Then comes November.

Halloween weekend rolls directly into the last month to start getting your act together, with nary a buffer week to sleep off your hangover. November is here, and it’s finally time to reap what you’ve sown. I’ve been feeling really overwhelmed thinking of everything I have left to do before finals and the sweet release of winter break, and writing it out feels enough like working on it to delay my annual autumnal panic. So, here are some key November events to both dread and look forward to.

Daylight Savings ends November 6.

It’s going to get DARK. We’re talking 4:30 p.m. sunset time, right around the corner. Try to maximize your morning dose of sunshine. If you are someone who is susceptible to seasonal depression, the time to start taking your vitamin D supplements was back in August, since it takes about three months for the nutrient to build up in the body.¹ The second-best time is now! You can set yourself up for a marginally better January, and maybe get some placebo benefits while you’re at it.

The PILA Silent Auction is Saturday, November 12...

The Silent Auction is the last big party of the semes-

¹ <https://www.univpoint.org/livewell/article.aspx?id=ca7f4766-8ba8-43a2-bbe7-0ef9efab5c6d>

Professor Citron Discusses New Book



Pictured: Professor Citron answers student questions. Picture Credit: Samuel Ellis '25.

Ethan Brown and Samuel Ellis '25
Staff Editors

On October 24, Professor Danielle Citron gave a brief talk and answered a panel of student questions about her recently released book, *The Fight for Privacy: Protecting Dignity, Identity, and Love in the Digital Age*. The event was jointly sponsored by LawTech, the American Constitution Society, If/When/How, the Black Law Students Association, the Lambda Law Alliance, and Law, Innovation, Security & Technology (LIST).

Professor Citron introduced her book by defining its focal point: intimate privacy. Intimate privacy consists of our innermost thoughts and bodily integrity, and Professor Citron said that these crucial elements of our personal lives are under threat, thanks in part to the rise of digital technology and eroded privacy protections.

To illustrate the types of intimate privacy violations that Professor Citron is worried about, she led with an anecdote about Joan, a recent law school graduate. While traveling for work, Joan stayed at a hotel. Much to her horror, after checking out of the hotel and returning home, she received a video from an anonymous source of her undressing and showering in her hotel room—someone had bugged the hotel bathroom. This source threatened to leak the video to all of Joan’s professional and personal contacts unless she provided more

naked photos of herself, and when Joan refused, the video of Joan appeared on Pornhub—with her full name embedded in the video—within twenty-four hours. The video quickly spread to 300 other adult websites. Joan’s social media accounts were compromised, and the video was sent to her colleagues, friends, and family members. When she contacted individual sites to get the video taken down, she was routinely denied, or worse, asked to send additional nude images and videos in exchange for the video’s removal.

Joan’s experience shows how digital apps and sites can so easily enable mass privacy violations and lead to intense personal damage in the process.

“Before, Joan loved using social media. Facebook was how she kept in touch with her high school friends. So, because she knew her social media would be weaponized against her, she shut it down,” Professor Citron said.

Professor Citron noted that almost every aspect of our personal lives, even at a granular level, is cataloged by our devices. Where we eat, where we work, who we spend time with, who we sleep with—all of these intimate details are monitored by our phone applications. Professor Citron asked audience members to raise their hands if they’d ever read any of the privacy agreements they signed with various companies and phone applications—aside from a few of her students, nobody had.

Professor Citron explained that everybody has a role to play in the preservation of intimate privacy and protection against its violation. She noted the widespread consumption of digital pornography, which, as detailed in the story of Joan and too many people like her, is rife with intimate privacy violations. Every visit to an adult website, every click, and every subscription signifies monetary contributions to an industry which profits from intimate privacy violations.

“The difficult news is that our intimate privacy is woefully underprotected,” Professor Citron said.

With this context in mind, Professor Citron then turned to answer questions from students, who were members of the several organizations sponsoring the talk. Zoe Kiely '25 asked Professor Citron for guidance about how queer youth—particularly in states like Virginia, where their rights at school are under siege—can safely navigate online spaces where their privacy may be put at risk.

Professor Citron encouraged all young people, particularly those in marginalized communities, to seek out support in digital spaces and emphasized that those spaces were important tools. But she also reminded them that the average perpetrator of digital intimate privacy violations has about 300 victims before getting caught, so young people should act

around north grounds



Thumbs up to the weather. Gray and cold perfectly suits the beginning of outlining season (or middle if you’re a gunner).



Thumbs up to that head of lettuce that outlived Liz Truss’s reign as PM. ANG takes no stance on Liz, but is impressed by the stamina of that lettuce.



Thumbs sideways to AirPods. ANG needs them to avoid interacting with people but hates that they get so cold so quickly in this weather.



Thumbs down to the beginning of November. ANG still thinks it should be the ninth month.



Thumbs down to the Christmas displays in Walmart. ANG realizes they’ve been there since August, but they’ve slowly been colonizing the garden section, and ANG has finally reached the breaking point.



Thumbs down to the softball mafia. ANG will continue to insist that every strike was the bat’s fault until new bats are made available (and probably even then), since the former jock on ANG’s team keeps insisting every bat is dead.



Thumbs up to the family of raccoons that have taken up residence on North Grounds. ANG welcomes the existence of kindred spirits that also live off of scraps.



Thumbs down to Halloween on a Monday. ANG is unsure of who is responsible for this calendar, but is inconsolable that this is not a federally-recognized holiday.



Thumbs down to fun-size Snickers shrinking again. How long is it before they’re just the size of a chocolate-covered almond?

Ranking 1L Section Softball Team Sponsors

Sarah Walsh '23
Editing Editor



Thanks to the overwhelming success (depending on how you define both “overwhelming” and “success”) of the *Virginia Law Weekly's* First Annual 1L Section Softball Team Name Rankings,¹ I'm back with more rankings involving 1L section softball teams. Specifically, I'll be ranking the sponsors for each section's softball team. Because 1L sections have significantly less choice in who sponsors them than they have in deciding how to name their teams, it's more or less impossible to come up with any set of criteria by which to rank the teams' sponsors. So, unlike my ranking of 1L team names, today's ranking system—much like the law itself—will be based almost exclusively on vibes and my own personal opinions. Teams may receive bonus points for securing sponsors who I believe suit the section particularly well, but such considerations will not be the primary factors involved in my ranking decisions.

You may notice that while there are ten 1L sections, only six teams' sponsors are included in today's rankings. That's because four sections are omitted from the rankings, since Sec-

¹ See Sarah Walsh, *Ranking 1L Section Softball Team Names*, Va. L. Wkly., Sept. 21, 2022, at 3.

tions A, C, G, and I don't have sponsors for their teams—at least not according to members of these sections and/or their PAs. If this information turns out to be incorrect, then that's on the sections, not me. Do a better job of promoting your sponsor next time.

Now, let's get into the rankings.

First: Hill & Wood Funeral Service (Section F)

Better call up your sponsor, Section F, because you just killed the competition. Getting a *funeral service* to sponsor your team goes unbelievably hard. With all due respect to every other 1L section, there was no way this sponsor wasn't going to win the top spot. Yeah, getting a bar to sponsor your team is cool, but it doesn't say, “Don't mess with my team” quite like being sponsored by, again, a *funeral service*.

In addition to the points that they receive for having what is unquestionably the coolest sponsor this Law School has ever seen, Section F also gets points for thinking outside of the usual bars/restaurants box with their choice of sponsor. The Hill & Wood patch on their jerseys, which goes far beyond the standard sponsor logo, notches the team and their sponsor some bonus points as well. And to top it all off, Section F's sponsor fits their team perfectly. You could not ask for a better sponsor for a team named “F for Final Judgment.” After all, what is death

if not the most final of all judgments?

Second: Dürty Nelly's (Section D)

I kind of feel like I shouldn't be rewarding this section with a high ranking on this list after they, you know, sued me in the school paper.² However, I can recognize a cool sponsor when I see one.³ I'm awarding additional points on account of the fact that the sponsor's name uses the section's letter, and because I can't think of a better Charlottesville establishment to match the vibe of a team named “Public InDecency.” Way to overcome your below-average softball team name, Section D.

Third: Jack Brown's Beer and Burger Joint (Section B)

I'll be honest, this has less to do with the sponsor itself and more to do with the fact that my softball co-captain is Jack Brown '23, yet for whatever reason, neither of us ever con-

² See Complaint, 1L Section D v. *Virginia Law Weekly*, 75 U.Va. 5 (2022).

³ Also, they called me a “lovely person” and “excellent softball captain” in their complaint, which I appreciate, even if they were effectively calling me a hypocrite at the same time. If you take nothing else away from this article (and honestly, why would you?), at least remember this: Ass-kissing works.

sidered asking Jack Brown's to sponsor our team. I'm thus rewarding the BARbarians for doing what Jack and I weren't smart enough to do ourselves. Having a bar chain as a sponsor for the BARbarians also weighs in Section B's favor, as does the bar's logo, which I would rank as being better than that of most of the other sponsors on this list. Plus, I've heard good things about their burgers.

Fourth: Starr Hill Brewery and The Virginian (Section H)

Props to Section H for managing to secure two sponsors, which I'm sure helped pay for their \$H-printed booty shorts. These two bars/restaurants don't really stand out in the sponsor crowd, but Section H made great use of their sponsors' money. While the sponsors themselves don't necessarily match Habeas Scoreplus's vibe (remember, this is the team that kicked off their 1L Softball Tournament quarterfinal game against Section C by yelling “HOES!” at the top of their lungs), the booty shorts that those sponsors helped pay for certainly do.

Fifth: Crozet Pizza at Buddhist Biker Bar (Section J)

First of all, this sponsor has a fantastic logo. Second of all, a couple Bar Reviews ago (specifically, the October 14 Bar Review), Crozet featured a band that, for at least ten minutes

straight, played what sounded like a jazz version of the Pirates of the Caribbean theme. The utter confusion that my friends and I felt at that Bar Review as we tried to figure out what we were listening to makes this otherwise-basic sponsor a solid choice for J's and Confused, giving them a slight edge over the sixth-place sponsor.

Sixth: Three Notch'd Craft Kitchen & Brewery (Section E)

To be clear, this isn't a bad sponsor—it's just not a particularly notable one. While I personally love Three Notch'd, it's not that distinguishable from sponsors like Starr Hill and Crozet. It also doesn't help that I was completely unaware that Section E even had a sponsor (due to the lack of logos present on their team shirt) until I asked a member of the team about it.

Regardless of where your team's sponsor landed in these rankings, I will note that as a 1L section—rather than some powerhouse Law School organization like Lone Star Lawyers—just having a sponsor is impressive in and of itself. And, more than anything else, I respect the sponsored sections' dedication to getting others to pay for things on their behalf. It's heartwarming to see the 1Ls embrace the summer associate lifestyle so early in their legal careers.

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Massive Chess Lawsuit Analysis: Personal Jurisdiction

Jacob Smith '23
Professor Liason Editor



Do you follow chess? If not, let me alert you to the next big defamation lawsuit. Hans Neimann, a nineteen-year-old grandmaster, has sued Magnus Carlsen and other defendants for defamation (among other things), based on allegations that he cheated. This article introduces the chess mess and analyzes just one piece of the legal puzzle: Which defendants will get dismissed for lack of personal jurisdiction?

Statement of Facts

Magnus Carlsen, the incumbent world champion, is Defendant Number One in Hans's complaint. (An affiliated chess app, Play Magnus, is also a defendant.) After Hans defeated Magnus at the Sinquefeld Cup, an elite St. Louis tournament, Magnus allegedly accused Hans of cheating during the tournament. Magnus then quit the tournament amidst circumstances that made his suspicions clear to the chess community.

The other defendants named in the complaint are Chess.com, its Chief Chess Officer Danny Rensch, and Hikaru Nakamura. Hikaru is an elite chess grandmaster and my favorite Twitch streamer. While streaming,

Hikaru reacted to the Magnus-Hans conflagration and shared his thoughts and conjectures rather extensively. Akiva Cohen, a lawyer who posts on Twitter, has suggested that it was a strategic blunder to include Hikaru, but as Reddit commenter suggested, Hikaru may have been added to the lawsuit just to shut him up.

Chess.com, on the other hand, reacted by banning Hans from its platform and tournaments and accusing him of lying about the extent of his cheating in online games. The website followed up with a seventy-two-page report that made claims about Hans's disciplinary history with the website and collected evidence suggesting that he may have cheated at over-the-board tournaments.

When Hans filed his forty-four-page complaint, seeking at least \$100 million in damages on multiple counts, he did so in Missouri. So, let's talk civil procedure. Because Missouri has a long-arm statute, personal jurisdiction turns into a question of pure constitutional law. The two main paths to satisfy constitutional due process are general and specific jurisdiction, so I will analyze both.¹

General Jurisdiction

¹ I am a mere law student, so take this analysis with a grain of salt.

Let's start with general jurisdiction. None of the parties actually reside in Missouri. For the individual defendants, that ends the analysis. For the corporate defendants, the question is whether their affiliations are so continuous and systematic as to render them essentially at home in Missouri under *Daimler AG v. Bauman*.² Both Chess.com and Play Magnus provide Internet chess services, which somewhat complicates matters. The Eighth Circuit appears to apply a three-part test to online businesses. First, it asks under the *Zippo* “sliding scale” whether the website passively posts information, is interactive, or enters into contracts that involve the transmission of computer files; second, it asks whether the quantity of contacts is sufficient; and finally, it asks whether jurisdiction would be reasonable and would not offend notions of fair play and substantial justice.³

Chess.com just might satisfy the Eighth Circuit's test. Chess.com and Play Magnus

² 571 U.S. 117, 138–39 (2014).

³ *Lakin v. Prudential Sec., Inc.*, 348 F.3d 704, 710–13 (8th Cir. 2003) (citing *Zippo Mfg. Co. v. Zippo Dot Com, Inc.*, 952 F. Supp. 1119, 1124 (W.D. Pa. 1997)).

subscribers pay for online services that include online lessons, which arguably places both of them in the highest *Zippo* category. Further, Chess.com has ninety-five million members, presumably including a good number of Missouri residents (though many “members” are not paying subscribers). The Play Magnus platform, in contrast, probably has fewer Missouri customers. The final “fair play” question is a messy combination of factors but doesn't obviously rule jurisdiction out.

Specific Jurisdiction

Missouri has specific jurisdiction if a defendant purposefully directed activities at the state, and the claim arises out of those activities.⁴ Magnus made allegedly defamatory statements to organizers of the Missouri tournament, so Missouri has specific jurisdiction over Magnus. There is probably no jurisdiction over Play Magnus, however, because Magnus was almost certainly not acting as an agent of Play Magnus, as Cohen has pointed out.

It is hard to see how the other defendants could have targeted Missouri. Posting (or in Hikaru's case, streaming) defamatory content so it can be accessed in Missouri is

not sufficient.⁵ The supposed defamation revolved around a Missouri tournament, but that doesn't work, either. For example, the claim that Plaintiffs “operated from Unionville, Missouri, where they killed cats, sold infected cats and kittens, brutally killed and tortured unwanted cats and operated a ‘kitten mill’”—was held to not be speech aimed at Missouri.⁶

Conclusion

Putting the pieces together: Missouri should have specific jurisdiction over Magnus. It may have general jurisdiction over Chess.com but likely lacks jurisdiction of either kind over Hikaru and Play Magnus. Personal jurisdiction should be a big part of the motions to dismiss that are due November 14. Choice of law doctrine, the actual merits, and the arbitration clause in Chess.com's Terms of Service should also feature in the motions, but I'll leave that for a later article, or as an exercise for the reader.

⁵ *Id.* at 796.

⁶ *Id.* Yes, this is a real case.

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⁴ *Johnson v. Arden*, 614 F.3d 785, 795 (8th Cir. 2010).

NBA Player Kyrie Irving Promotes an Antisemitic Movie

Jack Brown '23
Sports Editor



On October 27, NBA superstar Kyrie Irving tweeted a link to *Hebrews to Negroes: Wake Up Black America*. This 2018 movie, based on a book of the same name, claims to uncover “the true ethnicity of Abraham” and contains numerous antisemitic conspiracy theories, including references to the antisemitic work, “The Hidden Tyranny,” which opens with the line, “Most Jews do not like to admit it, but our god is Lucifer.”¹ The book that *Hebrews to Negroes* is based on goes even further, ascribing the beginning of racism against Black people to key Jewish texts, quoting the antisemitic hoax, *The Protocols*

1 “The Hidden Tyranny” is a booklet, published in 1978, that has become a staple of antisemitic literature due to its purported interview with a Jewish American, Harold Wallace Rosenthal, where Rosenthal admits to there being a Jewish conspiracy to take over the world. This interview did not happen, with even Tom Metzger, founder of the White Aryan Resistance, admitting that the entire meeting was fabricated.

of the *Elders of Zion*,² and claiming that “Jewish Slave ships brought our West African negro or Bantu ancestors to slave ports owned by [Jews].”

Irving is not a stranger to promoting controversial ideas. From implying that the Earth might be flat, to publicly refusing to get vaccinated, to sharing a video of conspiracy theorist Alex Jones talking about the existence of a “New World Order,” Irving has been known for his fringe beliefs off the court almost as much as for his skills on it. In most of his previous controversies, Irving was unapologetic for his actions and views. This latest incident seems to continue this trend, with Irving tweeting on October 29, “I am an OMNIST³ and I meant no disrespect to anyone’s religious beliefs. The ‘Anti-Semitic’ label that is being pushed on me is not justified and does not reflect the reality or truth I live in every day. I embrace and want to learn from all walks of life and religions.”

Later that day, at a post-game press conference, Irving was asked about both the video of Alex Jones he had shared six weeks prior and *Hebrews to Negroes*. During his exchanges with reporters, Irving took issue with the idea that he was promoting the book by putting it up on his Twitter and Instagram, stating that while he did not at all support Alex Jones’s actions surrounding Sandy Hook, he agreed with the substance of the Jones video that he posted. When asked what his thoughts were on his team’s owner condemning his sharing of the movie, Irving responded, “[O]ut of all the judgment that people got from me posting . . . without talking to me . . . I respect what Joe [Tsai] said, but there has a lot to do with the—not ego or pride of how proud I am to be an [sic] African heritage—but also to be living as a free Black man here in America, knowing the historical complexities for me to get here.”

Irving then continued by stating, “So, I’m not going to stand down on anything that I believe in. I’m only going to get stronger because I’m not alone. I have a whole army around me.”

The promotion of antisemitic material by Kyrie Irving is not an isolated incident. Earlier this month, Kanye West tweeted, “I’m a bit sleepy tonight but when I wake up I’m going death con [sic] 3 on JEWISH PEOPLE.”⁴ 2021 had 2,717 reported incidents of antisemitic behavior, the highest number of incidents recorded by the Anti-Defamation League in the last forty years. Since 2016, the ADL has measured a consistent increase in antisemitic incidents, which had been declining over the preceding fifteen years.⁴

While the rise in antisemitic events does not have only one cause, rhetoric by high-profile figures like Kyrie Irving and Kanye West is certain to exacerbate the problem. The two possess massive audiences and have cultivated very dedicated online followings, who can be found defending Irving and West’s views all over social media. Social scientists have long agreed that for attacks to happen against an entire class of people, there first needs to be a campaign of hateful misinformation to prime populations, moving them towards violence.⁵

4 William Brangham & Rachel Wellford, PBS Newshour, *Antisemitic incidents hit a record high in 2021. What’s behind the rise in hate?* (Apr. 29, 2022).

5 Alison Des Forges, “Leave

None to Tell the Story”: Genocide in Rwanda (Human Rights Watch, 1999).

6 There is an interesting discussion to be had about the role tech companies play by hosting content like *Hebrews to Negroes*. That is outside the scope of this article.

There's More Beyond the Corner: A Charlottesville Bar Review

Sai Kulkarni '23
Production Editor

Last year, I wrote an article with a few other writers on this paper about each Bar Review location. I absolutely stand by that, as it was a well-written article. But I wanted to discuss some of the lesser-known spots in the city. There are, of course, a lot of great places for food, but there are also some great places to grab a drink with a friend or two. Of course, this being a small town, there are only a few bars anyways, so you have likely heard about these places if you are a 2L or 3L. But these are places I didn’t know about during my 1L year, and I hope that by talking about them, I can encourage the newer students to give these places a chance and get away from the usual Corner, Kardi, Miller’s, and Rapture circuit. As a note, because of state laws, there are not really any pure bars in Virginia that do not also serve food, so just remember that as we go through. Some of these places are also known as good eateries.

Downtown

These are some of the more well-known spots, but I want to give a shoutout to them anyways. The first is a classic: the Whiskey Jar. This spot provides a lot of types of

its titular drink but also provides a wide range of beers and mixed drinks. Half indoors and half outdoors, it’s a nice sit-down spot during the week. During the weekends, you can get your usual “stand at the bar” ambiance, with much less waiting time for drinks. It’s definitely an older crowd, but that’s what you go here for.

The next stop is the newest addition to the Downtown Mall, Cville Brightside (right next to Whiskey Jar). This upstairs bar has a limited number of tables, but it is the ideal spot to go to for a Miami Vice. I went there with a large group of 3Ls at the start of the semester, but they were very accommodating. While the décor could use some work, the drinks and accompanying bar food are fantastic.

A bit of a newer favorite for me is Umma’s, which is just off of the Downtown Mall. This place has a nice, covered outside bar, with a standard uncovered section and an inside section with plenty of space. The real draw is that on Saturday evenings, it doubles as a gay bar. It’s nice that there is some degree of diversity here in town.

Just over from Umma’s is South Street Brewery. Another relatively well-known spot, this is the ideal location for watching sports—es-



Pictured: The Quirk Hotel Rooftop. Picture Credit: Quirk Hotels.

pecially now that the Champion Grill near Trader Joe’s has shut down. South Street Brewery has, as the name suggests, a large selection of beers—just the ideal sports bar location.

Main Street

There are plenty of great places to eat and drink on Main Street. Obviously, the most well-known is the Quirk rooftop. This bar provides a great view, top tier ambiance, and a wide range of mixed drinks to make any Instagram story pop off. But there are some other great places nearby. Tavern & Grocery is a great dinner spot with a fantastic Sunday brunch option. The real winner, though, is the speakeasy in the basement: Lost Saint. I don’t want to say too much,

so I will just recommend that you take the chance and head down there; it’s worth it. Blue Moon Diner provides the ideal location for some “hair of the dog” on Saturday, with greasy food and drinks to hold you over. Both Oakheart Social and Little Star are far more restaurants than they are drinking spots, but I would absolutely recommend them if you are looking for high-class cocktails and excellent food.

Miscellaneous

All of us spend plenty of time at Kardinal Hall—it’s the unofficial Law School bar at this point. But if you are in the neighborhood, make sure to check out Random Row next door. It’s a much smaller spot, but with a few craft beers and an outside area,

it is a bar worth enjoying, at least while it isn’t snowing. In the same neighborhood is Dairy Market. I’m sure all of you have taken a trip there, but don’t miss out on the brewery tucked away inside. As my friend Alayna Choo ’23 will tell you, it’s a great place to get some work done while having a nice drink.

Finally, I can’t write this whole article without talking about the dirtiest dive bar in the city and the one place you can guarantee you will find me partying at (other than Co-Executive Editor Jon Peterson ’23’s house), Dürty Nelly’s. I would prefer if swarms of 1Ls didn’t show up there. I would prefer to keep it a secret forever. But it is my duty to pass it down to the years to come. The drinks are perfectly matched with the vibe. It is absolutely a bar for locals, with a very homey atmosphere. The bouncers are friendly, and the bartenders are quick. If you are looking for a place to relax during your time at the Law School, consider DN. But just stay away on Wednesdays. Those nights belong to Kelli McQuillan ’23 and I, rocking out to classic karaoke.

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

Literally All Law School People

v.

The Darden Foundation
75 U.Va 9 (2022)

BNINSKI, J. delivers the opinion of the court, in which LAKE, C.J., KULKARNI, J., GRUBBE, J., BROWN, J., PETERSON, J., and MORSE, J., join.

PAZHWAK, J. and WALSH, J. concurred.

Bninski, J., delivered the opinion of the Court.

Today, my colleagues and I return to a subject that has plagued the Law School community since January 2021—namely, the construction of the seemingly as-yet-unnamed hospitality facility that will “replace the long-time UVA Inn at Darden.”¹ While, like many legal professionals, the members of the Court normally rejoice in the opportunity to hold forth, and may, for that reason, write many unnecessary and repetitive articles bemoaning minor inconveniences, it is with great sorrow that we raise the topic of this neo-“UVA Inn at Darden” once more.

Facts and Posture of the Case

It has come to our attention that, despite being enjoined in 2021 to halt construction “and return Grounds to their former glory,”² Darden has persisted in constructing a brick behemoth; a hospitality horror;³ a conference center cataclysm. We note this blatant disrespect for the authority of this Court as we

¹ <https://news.virginia.edu/content/dardens-new-hotel-halfway-its-spring-opening>.

² *Students v. Construction*, 73 U.Va. 17 (2021).

³ This is, we concede, dramatic license; the building itself is not that bad.

turn our attention to the new, more specific, complaint before us.

Literally All Law School People brought this class action, seeking relief from the incessant noise of the Darden hospitality facility construction. The complaint cites months plagued particularly by beeping that is audible in every outdoor Law School space. The Class of 2023, which makes up part of the general class of plaintiffs, points out that, given the coincidence of their tenure at the Law School with the early days

of the COVID-19 pandemic and its attendant need to spend time outside if at all feasible, they are particularly injured by the construction noise. They note that the construction project will not end until after their graduation, and so they have no hope for any beep-free era during their Law School years.

The District Court of Petty Complaints granted the relief sought by Plaintiffs, and we now address the Darden Foundation’s appeal.

Because this Court is not only petty but also capricious, we are prepared to overlook the fact that the Darden Foundation persisted in its unlawful construction project after the injunction of 2021.⁴ For that reason, we do not immediately dismiss the appeal or hold the Darden Foundation in contempt of court.⁵

⁴ And perhaps, someday, we will get to confer at the Conference Center. The members of the Court love to confer, fancily.

⁵ We don’t want to tempt fate. The Darden Foundation

The Darden Foundation argues on appeal that noise is an inherent part of any construction project and that beeping, specifically, plays an important role in assuring the safety of the construction site by notifying personnel that machinery is backing up. Moreover, the Darden Foundation points to two Occupational Safety and Health Administration requirements, 29 CFR 1926.601(b)(4) and Section 1926.602(a)(9)(ii). These requirements, the Darden Foundation argues, place on it a legal obligation to

provide “audible alarms” that accompany the reverse movement of any motor vehicle or earthmoving equipment that suffers from an obstructed rear view. The appellant’s brief expresses horror at the idea of deviating from OSHA’s requirements.⁶

The appellees’ brief consists largely of unhinged ramblings about “that hideous BEEP.” The appellees claim that this is because the brief was written “under the tent in Spies and BEEP we are really struggling to think straight with BEEP all the interruptions, sorry petty judge people.”

Discussion

This Court has great respect for safety. And because each year, thousands of construction sites will see a fatality,⁷ we recognize the importance of the

probably already has contempt for this Court.

⁶ We find the Darden Foundation’s newfound respect for the law honestly just insulting.

⁷ <https://www.osha.gov/data/commonstats>.

Darden Foundation’s commitment. However, the Foundation has overlooked guidance from OSHA which indicates that, in lieu of hideous beeping, an observer can signal to a driver that it is safe to back up. This approach has much to recommend it, namely a lack of beeping and the creation of a job.⁸

Because this Court is capricious, we also took it upon ourselves to develop the record. On the Law School lawn, outside the august entrance to our institution: beeping. Outside Slaughter Hall: beeping. In the

outdoor spaces surrounding ScoCo: beeping. In the Purcell Garden: beeping. In Spies: beeping. The Court finds it all very annoying.

Conclusion

Due to this annoyance, and bolstered by the Darden Foundation’s failure to adequately explore alternatives open to it under OSHA, we uphold the judgment of the district court. The beeping is enjoined. The

⁸ We note that the Darden Foundation’s assets were listed in 2020 as in excess of \$500 million; It can afford to pay a signal person. <https://www.causeiq.com/organizations/university-of-virginia-darden-school-foundation,546046419/>.

Darden Foundation can supply one or more signal persons to ensure safety of movement, or it can refrain from ever allowing its machinery to back up. This Court, for one, will not back down.

Pazhwak, J., concurring.

The majority correctly upholds the injunction against the annoying beeping of construction vehicles at the new “UVA Inn at Darden” site. However, due to their varied places of residence away from said site, my dignified colleagues failed to recognize another subclass of law students who have suffered great and terrible injury from the construction site noise: Copeley Hill residents. Many of the graduate Copeley Hill apartment buildings, especially those near Copeley Field, were often exposed to copious construction noises during many of the daylight hours of the weeks and weekends for the past three years. Given the thin walls of these apartments, the noises often penetrated at inopportune times, waking up bleary-eyed law students sleeping off major memo hangovers, among other things. The now-3L Copeley residents were particularly affected, forced to endure construction noises while confined to their abodes during the pandemic.⁹ The majority ought to

⁹ Some particularly unfortunate 3Ls with exceptionally disconnected pandemic sections had the double whammy of enduring construction noise-

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Faculty Quotes

B. Spellman: “My ex husband is a very famous tournament bridge player. Not that it means he is famous outside the world of tournament bridge.”

B. Sachs: “MLK Jr. he is not, but he is cashing in on his time in jail.”

K. Kordana: “Do we want elected judges? No, that’s too democratic. Get back public!”

C. Barzun: “In a lot of ways, you have to be really honest to be a drug dealer.”

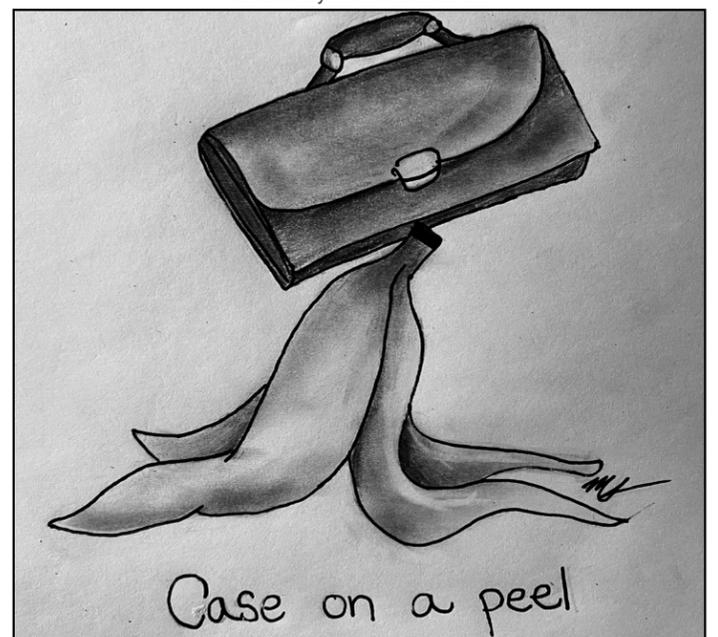
R. Harmon: “If you don’t know what I’m talking about, Google it! Don’t Google it now.”

A. Coughlin: “Google it - ‘sex with twin.’”

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

Cartoon

Created by Monica Sandu '24



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COPA

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reconsider additional sanctions beyond enjoinderment, including uncapped punitive damages or, in the alternative, ordering lifetime access for affected 3L Copeley residents to the amenities that will be available in what is sure to be a luxurious building befitting the wealthy donors for whose benefit it was built.

Walsh, J., concurring.

I agree wholeheartedly with the majority's reasoning in today's decision. After all, the only good thing to come out of the Darden construction is the fact that law students keep trying to aim for it when playing softball on Copeley Field. I write separately today because I wish to underscore the incredible, yet unsurprising, callousness that the Darden Foundation displayed in choosing to maintain their construction project's incessant beeping, when hiring a signal person—as Justice Bninski so wisely observed—had been an option this entire time.

While I expect little from the Darden School—and even less from the corporation that supports it—I am astounded by the audacity of the Darden Foundation. I respect OSHA requirements as much as the next Justice, but it is outrageous for the Foundation to cite safety considerations as their excuse for inflicting *years* of emotional, mental, and physical damage—

es at some times and roaring softball game cheers at others, reminding them of their tragic, lonely situations.

in the form of beeping—on generations of UVA Law students. What of the students' safety? Or the faculty and staff employed by this institution, for that matter? Do you think that constantly being forced to listen to the obnoxious BEEPs emitted by the Darden construction site is *good* for us? It isn't—after all, aside from the hearing damage that is all but ensured to result from the beeping, the distractions created by the beeping must also be considered. The overwhelming annoyance presented by the beeping is enough to distract anyone, even those with ears of steel and otherwise-endless focus, from important tasks, such as looking both ways before crossing that weird diagonal crosswalk next to the school that was created as a result of—you guessed it—the Darden construction.

The fact of the matter is that the Darden Foundation's claims of concern for worker safety ring hollow in light of their clear disregard for the safety of all others who may be affected by their construction project. In classic Darden snake fashion, the Foundation attempts to use rules and considerations that are meant to help others so that it may benefit only itself. Thankfully, this Court saw through these attempted manipulations of the law and chose the remedy required by justice: enjoining the beeping.

Accordingly, I concur.

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It's Corn: A Big Lump with Knobs, It Has the Juice

Darius Adel '24
Staff Editor



While Halloween has come and gone, autumn is still in full swing. The leaves are falling, fuzzy sweaters are coming out of the closet, and the threat of outlining is looming. Before you latch onto that last point, I think you should enjoy the season to its fullest, and that means going to a corn maze.

My personal favorite is the Blue Ridge Mountain Maze. It's a relatively close drive from Charlottesville, and you can tackle the maze at night. Trying to navigate a giant maze in the dark can be a bit scary, but that's half the fun. Take some friends with you and make a night of it. If you're feeling competitive, you can race each other to the end of the maze, but personally, I like making the whole thing a group effort.

Last time my friends and I tackled the maze, I brought a little souvenir home with me. I found an ear of corn near the exit that had fallen off its stalk. Instead of leaving it to the corn goblins, I took that puppy home. Channeling my newly-acquired Virginia energy, I decided to plant some of the kernels and see if they would grow.

I had never grown corn before, and in case you haven't either, I'll give you a tip: Don't plant corn in November. As a spoiled Californian, my instinct is to plant things wherever and whenever. Virginia's first true frost, which came a week after my sowing, killed my corn sprout immediately. Luckily, I was able to replant some kernels I saved this last summer, and they have grown beautifully. However, that early corn death led me to ask the question, "What can I plant and grow in mid-November?"

Charlottesville is in USDA Hardiness Zone 7a, which is a category of plant hardiness defined by our general climate conditions. Basically, our zone dictates what plants we can grow and when. While avocado and tomato plants may be out of the question during a Virginian November, we still got a lot of options. Are you looking for a superfood to keep you healthy over the holiday season? Kale is a great option. It is very cold-resistant and grows fast enough that you may be able to harvest some before the end of finals. An old wizened shamaness on the Appalachian Trail even told me that the frost makes the leaves even sweeter.

Not a health nut but want a vegetable that delivers fla-

vor? Garlic is your best bet. In fact, this is basically the perfect time to plant the vampire bane. The fun part about growing garlic is you don't need to buy seeds from a garden store (shout out to Fifth Season Gardening on Preston Avenue, next to the Dairy Market); you can just toss in some of those lil baby cloves you get when you buy a whole head of garlic. The amount of garlic you get from peeling them is simply not worth it, anyway. I usually plant them directly in the ground, but you can get them started by wrapping them in a wet cloth and waiting for roots to sprout.

Spinach may seem a bit boring, but if you plant it in November, like I did last year, you'll have a huge harvest once the snow melts. I mostly just chucked the leaves into disgusting-looking smoothies, but maybe you'll find a better use for them. Although I have never made them, Kronk Pepi-krankenitz's famous spinach puffs are supposedly pretty easy to make, as long as you don't burn them.

There are a ton of other crops you can plant over the winter, like asparagus, beets, brussels sprouts, radishes, etc. I haven't tried all these out in Charlottesville, but

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HOT BENCH



Katie Poore '25

Interviewed by Andrew Allard '25

Hi, Katie! Thanks for joining me on Hot Bench. Let's start with an introduction: Where are you from, where did you go for undergrad, and what brought you to law school?

I am originally from Tuscaloosa, Alabama. I actually went to UVA for undergrad. I graduated in 2019 and tried out a bunch of different things over the last three years. I came to law school because I feel like a J.D. offers a lot of flexibility, and I'm still not entirely sure what I want to do. But I know that I'm interested in law in some capacity and in working with individual people. I worked a job in book publishing for a while that had a lot of lawyer components, like drafting of contracts and negotiations. I really liked that work.

What is your hometown Tuscaloosa famous for?

Football! That's where the University of Alabama is. But my whole family is made up of Auburn fans, and they're major rivals. The Alabama-Auburn rivalry is of a different kind. UVA has its rivalry with Virginia Tech, but it pales in comparison. We had Auburn decorations in our yard in Tuscaloosa, and they'd get stolen or vandalized.

Wow! I have some classmates that are Bama alums. Hopefully they won't read this and come for you. Or me. But you're a double 'Hoo! Are you in love with Charlottesville?

I love Charlottesville. Originally, when I was applying to law schools, I was interested in going to New York because it felt more adventurous. But I visited a friend who's a 2L in February, when I was starting to decide on law schools, and she seemed so happy here. Everybody here told me that it was the best choice they'd ever made. It kind of sold me.

I understand you also lived in France after undergrad. Parles-tu français?

Oui! I was in a little college town called Chambéry, an hour south of Geneva, in the Alps region. I taught sixteen classes of high school to local French kids. It was the best. I lived with three

French roommates because I really wanted to be fluent. They were all ridiculously good cooks, so we did a lot of apartment dinners. They tried to teach me to ski, with not a great amount of success.

Had you never been skiing before?

I did when I was eight. But I just don't really think that counts, right? That's about as late as I played softball, too, which seems to be an advantage here.

So, what are you going as for Halloween this year?

My two roommates and I have been planning to go as Gaslight, Gatekeep, Girlboss. It's been shocking the number of people who haven't understood what that is. It makes me feel like I'm on TikTok more than I need to be... When I told you, I thought, "What if I have to explain?" It's an internet thing, it's a commentary on Lean In feminism, but that's not why we're doing it—we just think it's funny. But we did lose our Gatekeep, so now we're just Gaslight, Girlboss.¹

What do you wear to represent Gaslight? It sounds pretty abstract.

¹ A happy post-interview note: Katie and company were able to find a volunteer to fill in for Gatekeep. (Honestly, who wouldn't want to be a part of that trio? Commitment to the bit comes first on Halloween.)

I'm wearing a lot of black and gold, and hopefully sparkles. My friend bought me a bunch of glow sticks. And I have a yellow tutu and yellow hair spray paint that I will probably not use. I want to find a feather boa that has black sparkles in it. I want to be a classy Gaslight.

That sounds very good—that could blow people out of the water at Halloween.

Thank you! Girlboss is the easiest one. She's wearing a blazer.

Oh yeah, that's just going as a law student.

Yeah, exactly! To be fair to our lost Gatekeep, Gatekeep is definitely the hardest. What do you dress as? A fence?

Isn't there a character from Ghostbusters that was a literal gatekeeper? Maybe you could go as that. Anyway, many people are saying that law school is quite challenging. What do you like to do to de-stress in your free time?

I'm a musician. I've played violin for nineteen years. I like to do that. I like to play guitar. And I'm a big hiker, although I haven't really had any time for that.

Are you involved in any musical groups at

² My pop-culturally inept brain was thinking of Zuul, which would be a great costume.

the Law School? You'd think that a law school would have a role for violinists; that feels very classy.

Yeah, that's actually one thing that I want to do. It'll probably happen next semester just because I don't think taking on anything new right now would be great. I grew up playing classical music, but I love bluegrass music. I think it's really fun, and I want to do more of it.

Speaking of talents... we have Civil Procedure together, and you have a talent for which you're famous in class. Would you care to share what that is?

I can say words backwards really fast. It's a great party trick. There's no utility to it whatsoever.

Well, it impressed all of us! Could you say Virginia Law Weekly backwards?

ylkeew wal ainigriV

Wow. That's great. Our readers will love that. Can you do it in French, too?

Yeah, but it's a little harder. It has to be a word I've seen before because it's really visual. I've been able to do it since sixth grade, but I didn't tell anyone about it until I was twenty-two. So, when I showed my mom for the first time, she said, "That's satanic."

Hot Bench page 6

Citron

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cautiously and avoid certain behaviors—like sending nude photographs—which severely jeopardize their safety.

Representing the Black Law Students Association, André Earls '24 asked Professor Citron if there were ways to leverage intimate data to empower marginalized communities. Professor Citron noted that “surveillance is a story of Black surveillance and surveillance of marginalized communities.” The problematic foundation of surveillance renders its use for empowerment to be what Professor Citron calls a “hard possible.”

Professor Citron then compared the United States’s grappling with intimate privacy concerns to similar problems around the world. She noted South Korea as a positive example for what can happen when people successfully organize for government protections against intimate privacy violations. Before the protections, South Korean public bathrooms were routinely recorded so that when women used the restroom, an intimate video was taken and later uploaded online. The heinous practice, known as “molka” (or 몰카), was named after a Korean prank television show and resulted in women either avoiding public bathrooms or carrying a mask and a gap-filler to block the view of the stall interior from the rest of

the restroom. Public demonstrations in the late 2010s garnered tens of thousands of protestors and led to the successful lobbying of the South Korean government to take action against the practice. Professor Citron, working with the South Korean government, noted that one of her first key suggestions was to cease the use of the term molka and instead refer to the practices as “digital sex crime content,” so as to indicate the seriousness of such intimate privacy violations.

Professor Citron closed the talk by encouraging attendees to engage with their colleagues about what data privacy and the protection of intimate information means to each individual.

“Let people in your life know your expectations about sharing your email and text. Whatever it is, have conversations with people you care about and communicate with them about the types of privacy you expect of each other. . . . That ought to be how we live every day of our lives.”

Still, Professor Citron warned that while there are steps that can be taken on an individual basis, there is much work to be done before the conundrum of intimate privacy violations can be solved. “It’s a Band-Aid for a bomb.”

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Corn

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they are all snow resistant and should be fine in our 7a climate. Growing plants should be fun, so go on and experiment a bit. No one reading this article depends on a crop yield to survive, so who cares if you mess up?

Most of you don’t have a yard where you can grow plants. That’s okay; I got you. All the crops I mentioned above work great in planter pots. All besides corn, I suppose, since corn stalks have really deep roots. My friend Tristan Deering '24 blessed me with that little tidbit. He’s not an elderly shamaness, but he’s close enough. You can have a horticultural wonderland on your tiny apartment balcony. All it takes to start is a container, some good soil, and seeds you can probably get for free.¹

Law school has a nasty habit of making its students feel out of touch. People are likely to neglect their hobbies, lose touch with loved ones, and delve deep into the highly insular legal profession. So take every opportunity you can to go to that corn maze with your friends, touch some dirt, and start your own garden.

1 Check out our local seed library at <https://cvrl.net/seedlibrary/>.

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Hot Bench

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I admire your commitment to it. OK, lightning round! Which Chex Mix piece is the best?

I like the light Chex, but only when they have a lot of the spice on them. There are two or three per bag. Those are the best pieces.

Very good answer. There are wrong answers to that question.

Yeah, the breadsticks...

If you had answered breadsticks, I would have ended the interview. Best and worst Halloween candies?

Candy corn’s the worst.

I agree. Wholeheartedly. That’s a controversial one.

And Twizzlers. They’re just not worth it. I eat one every year on Halloween and say, “Nope, still sucks.” Then, the best... Reese’s Cups.

Yes! Up top for Reese’s. OK, the Musk-Twitter deal closing—good news or bad news?

Bad news. I just really don’t want Trump back on Twitter. And Elon Musk is an attention hog.³ I just wish that everyone would stop talking about it because I feel like that’s what he wants.

3 Katie used a word other than hog, which I’ll allow our readers to imagine.

That sounds accurate. Favorite place you’ve ever traveled?

I’m partial to France, but I went to the Isle of Skye in Scotland. It was the most otherworldly place I’ve ever been. It looked like a place unicorns would live. There were rainbows everywhere. It was beautiful.

Okay, last one. Do you believe in ghosts?

I’d say no, but I still don’t like being near my bed in the dark at night. I’m open to the possibility, but I’d say no. Just to maintain a little bit of magic. But not too much.

A little bit of magic is important when you’re a law student.

You need it!

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November

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ter. It’s a fancier affair than the usual SBA event, so start thinking through your outfit options. This will give you enough time to decide that you don’t like any of your clothes and can’t possibly re-wear your dress from last year like you were planning after all, so you can then make a totally necessary online order without having to pay those pesky rush delivery fees.

...and the fall MPRE is Monday and Tuesday, November 14 and 15.

PILA weekend is going to be a busy time. Don’t leave your MPRE prep to the last minute, or you’ll be cramming the model rules in between green tea shooters at Rapture. It’s certainly been done before, but it doesn’t have to be you doing it. Both Barbri and Themis have free MPRE prep programs—work through the practice problems over the course of about a week and go into the exam feeling ethical enough to practice in California or Utah.

Outlining

Maybe this will be the semester you don’t wait until Reading Weekend to start outlining. Pay your club dues and get access to the curated outline banks they offer now, so you can start Frankenstein’s process of pulling together all the best parts of different outlines and supplementing them with your own notes. Exams begin December 12—that’s six weeks away, including Thanksgiving. Imagine the

guilt-free stuffing and Black Friday shopping you can indulge if you’re in decent shape with your finals prep by then.

1Ls: Job Applications and Major Memos

LRW is the definition of a back-burner class for every 1L except the select few of you who plan to actually be good at your jobs. If you don’t understand the nexus test, or you’re not sure what fair use is, schedule a meeting with your writing fellow or professor now. Take your revisions seriously and set yourself up for success next semester so that you don’t have to do all your research a second time.

Applications for summer positions start getting serious in November as well. If you want to be a summer associate, especially in the Texas market, you want to apply early. Hopefully, you’ve met with OPP or the Public Service Office at least once by now to work on your resume, but a practice interview session can really help settle your nerves. Plenty of people apply over winter break and get jobs throughout the spring, especially for public service positions. But the anxiety of being an unemployed 1L is real. Being the last person in a friend group to get an offer can feel pretty demoralizing, and it’s a huge distraction from your other work. Do yourself the favor of at least charting your course and prepping your cover letters so you are ready to hit the ground running.

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