



VIRGINIA LAW WEEKLY

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

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From the New EIC: Come Join UVA's Best Journal

Nikolai Morse '24
Editor-in-Chief

I remember the Student Activities Fair from my 1L year very well. It was a humid, sunny day in Spies Garden, and I was dazzled by the glamor and self-assured authority of the 2L and 3L leaders of various student organizations, flanked by cardboard trifolds and smudged sign-up sheets. Out of an overpowering Midwestern compulsion to be polite, I awkwardly signed up for the listservs of nearly twenty groups I had zero interest in joining. After nodding and muttering something non-committal and unintelligible to the then-president of Common Law Grounds, something caught my eye. Near the center of Spies, I saw a table covered with koozies, popsicles, and a speaker blasting Doja Cat. Standing around the table were a group of students, red solo cups in hand, who seemed to have been plucked from a Big Ten tailgate¹ and dropped in the middle of our student activity fair. Thus, I was (somewhat confusingly) introduced to the *Virginia Law Weekly*.

Since my first semester at UVA Law, the weekly meetings held in SL279 have been one of the high points of my week. Each Monday² we gather to eat pizza, catch up, and plan stories for the next week's paper. The creativity, humor, curiosity and—let's face it—megalomania³ that I have witnessed in these meetings encapsulates everything I find special about going to school here. From reviews of Charlottesville hiking trails and taco trucks, to covering events hosted by leading legal experts, and the occasional school controversy—for me, the *Law Weekly* has reflected the range of interests and personalities in our school. Accordingly, it is an honor and candidly, a huge ego boost, to serve as the next Editor-in-Chief of the *Virginia Law Weekly*.

¹ But one of the less cool and less fun schools, like Purdue.

² Again, in SL279 at 5:30pm. Come by for free pizza, laughs, and learn how we run the state's propaganda arm a three-time winner of the ABA Law Student Division Best Newspaper Award!

³ See the Court of Petty Appeals or one of our many unsolicited advice columns.

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Panel Discusses Suit Challenging Abortion Pill



From left to right: Professor Naomi Cahn, Assistant Dean Leah Gould, and Professor Margaret Riley (Photo Credit: University of Virginia School of Law)

Garrett Coleman '25
Managing Editor

On Tuesday, March 28, If/When/How organized a panel to discuss the pending case of *Alliance for Hippocratic Medicine v. FDA*. The panelists were Professors Naomi R. Cahn and Margaret Foster Riley, as well as Assistant Dean for Public Service Leah Gould. A decision on the case is expected any day now, but this discussion provided information on likely outcomes, the merits of each argument, and the potential implications for abortion and administrative authority more generally.

The case revolves around a medical abortion drug known as mifepristone ("MIFE"),¹ which Professor Cahn called "safer than Tylenol." It is the first in a series of two drugs that are used in a medical abortion. Professor Cahn also said that these procedures constitute over half of all abortions in the United States. The second drug, misoprostol ("MISO"), is not currently under consideration because it was approved by a different procedure. Professor Riley noted that it can be used for medical abortion by itself, but that this is not the preferred method. Further research is currently being carried out.

The Alliance for Hippocratic Medicine ("AHM") claims

¹ Patricia J. Zettler, et al., *Alliance for Hippocratic Medicine v. FDA—Dobb's Collateral Consequences for Pharmaceutical Regulation*, 388 New Eng. J. Med. e29 (2023).

that MIFE was improperly approved under Subpart H of the Federal Food, Drug, and Cosmetic Act ("FDCA").² In the FDA Modernization Act of 1997, Congress clarified that Subpart H was meant to apply to treatments for a "serious or life-threatening condition."³ AHM disagrees with this characterization of pregnancy and therefore rejects the FDA's authority to approve MIFE. While MIFE received Subpart H approval in 2000, its FDA oversight did not end there. MIFE was also subject to a Risk Evaluation and Mitigation Strategy ("REMS") that was approved by the FDA in 2011.⁴

Professor Riley, with her background in food and drug law, had plenty to say on the validity of AMH's argument. She claimed that their preliminary brief was filled with "cherry picked" data and that she does not see how it could pass factual review. She also said that the weight of the scientific research was clearly in favor of the safety of MIFE. It is even safer than many approved contraceptives. Further, she tied this case into a larger conservative mission. For example, the Goldwater Institute has wanted to "eviscerate" FDA authority for many decades. In her view, this is part of an attempt to restrict the FDA's ability to issue a "scientific assessment of the

² *Id.*

³ *Id.*

⁴ *Id.*

benefits and risks." She also pointed out that "[t]he weakness for the FDA is that . . . it doesn't deal with moral issues." And this opens a lane for states to insert moral considerations into their restrictive legislation, putting it outside of the FDA's purview.

Her thoughts may not be persuasive to this court in particular, though. Plaintiffs were careful to select the Amarillo division of the Northern District of Texas, in which Judge Matthew Kacsmaryk is the only judge to sit.⁵ Judge Kacsmaryk was appointed by President Trump and confirmed by the Senate in 2019. And he is a "devout Christian" who has been described by his sister as someone who is "passionate about the fact that you can't preach pro-life and do nothing."⁶

Professor Cahn laid out two options for this court. The first involves deferring to the FDA and its administrative authority. She does not expect this to occur. Rather, she expects Judge Kacsmaryk to conclude that the FDA "overstepped its authority" and that this abortion pill is unsafe. From there, he can

⁵ Caroline Kitchener & Ann E. Marimow, *The Texas Judge Who Could Take Down the Abortion Pill*, Washington Post (Feb. 25, 2023), <https://www.washingtonpost.com/politics/2023/02/25/texas-judge-abortion-pill-decision/>.

⁶ *Id.*

ABORTION page 6

around north grounds



Thumbs up to sharing a gift shop with Darden. ANG has yet to see any confused business students staring at the abject poverty of law students, but dreams remain.



Thumbs down to whoever is vaping in the Purcell bathroom. ANG just wants to smell the ammonia in peace.



Thumbs up to Costco selling Greenberry's coffee beans in bulk. Who knew they had local suppliers?



Thumbs sideways to Daylight saving time. ANG loves watching already stressed 1Ls lose an extra hour of sleep but hates that darkness engulfs the land one hour later in the day.



Thumbs up to the collapse of Silicon Valley Bank. ANG loves to see tech bros suffer, especially when it means more jobs for restructuring lawyers (the most ANG-y of all lawyers).



Thumbs down to the Oscars. ANG was disappointed at this year's utter lack of violence. ANG lives for drama. You'd think actors would, too.



Thumbs sideways to the revival of the Law School Yearbook. ANG loves to scribble in others' books, but is notoriously camera shy.



Thumbs up to professors giving massive reading assignments for spring break. ANG loves it when rich classmates have to do readings on their yacht in the Mediterranean.



Thumbs down to the snow on Sunday. There was just enough to tempt ANG to frolic, but not enough to look dignified.

The Four Functions of the UVA SBA

Jacob Smith '23
Professor Liason
Editor



We have just held Law-School-wide elections over who will lead the Student Bar Association, or SBA. But what does SBA do? Well, SBA does basically four things. It runs events, represents students, recognizes student organizations, and provides information to the student body.

Planning Events

Here is SBA's greatest power: the ability to spend lots of money on bringing students together. Say what you will about SBA, it plans an impressive array of events. There's all the Bar Reviews. There's Barrister's and Fauxfield. There's the Spies Garden social events, and Feb Club, and special events for 3Ls, and the list goes on. Outgoing president Juhi Desai '23 estimated that if you count everything that someone from SBA is involved with, SBA has a hand in fifty to sixty events per year.

That's a big responsibility, and one that our incoming and outgoing presidents have taken seriously. When asked about her proudest accomplishments as president, Desai was quick to point to Mental Health Week, as well as an event about the Jackson, Mississippi water crisis that SBA co-sponsored and the *Law*

Weekly covered.¹ Incoming president Tommy Cerja '24 has given events a lot of thought, too. Along with bigger venues, better DJs, and cheaper tickets, Cerja would like to co-sponsor more events with student organizations, with the idea of basically letting them throw a party on SBA's dime. He also intends to arrange a big fall competition that he described as the equivalent of bringing Darden Cup to the Law School.

Representing Students

Now we get to SBA's most solemn function: SBA as the student body's voice. For example, the SBA president nominates students to provide representation on faculty committees dealing with items such as curriculum, public service, and new faculty hiring. The SBA president also meets with Dean Sarah Davies '91 every week, and less frequently with Law School Dean Risa Goluboff, providing an opportunity to ask questions or pass along concerns on behalf of other students.

More formally, SBA can officially take a position on a topic. SBA's bylaws provide for resolutions, defined as "statement[s]"

1 For coverage, see Ethan Brown, Professor, Activist, and Student Leader Investigate Jackson, MS Water Crisis (Nov. 9, 2022), <https://www.lawweekly.org/front-page/2022/11/9/professor-activist-and-student-leader-investigate-jackson-ms-water-crisis>.

of the sentiment of the Student Body."² According to the bylaws, SBA can pass a resolution in one go with a three-fourths vote, or by a more involved three-step process that requires two majority votes at separate meetings, with email notice to the student body in between those meetings.³ SBA has not passed any resolutions recently, although, in November, SBA did apparently endorse another organization's letter without going through the formal resolution process.⁴ However, Cerja wants to give SBA a more active role in speaking out on behalf of the student body. He told me he hopes to shift SBA away from its traditional ideological neutrality and put out more statements.

Recognizing Student Organizations

SBA also has a role in recognizing new student organizations. While the SBA constitution says nothing about that power, it has long been accepted practice that SBA screens new student organizations before their applications reach Student Affairs.⁵ Recognition is impor-

2 SBA Bylaws, Art. IV, Sec. 1 (last amended July 15, 2020).

3 *Id.* at Section 2.

4 See SBA Minutes, Nov. 29, 2022, available at <https://www.uvasba.com/general-5-4>.

5 This function is covered extensively by SBA Bylaws, Art. X.

tant for student clubs because it lets them access resources such as Law School Foundation funding and room reservations. SBA's approval process isn't especially rigorous: Desai said, "Generally, we're going to vote it up." However, SBA officials get the chance to ask questions about the proposed organization, hoping to verify that it has a viable future at the Law School.

It could have been otherwise. The UVA Student Council requires Main Grounds groups to have hosted at least three meetings (not including interest meetings and social gatherings) and to have at least ten committed members before they will be approved.⁶ And at some law schools, I'm told the SBA's power extends to approving club budgets.

Providing Information

The final function SBA performs is simply providing information. This is most visible in SBA's Monday Mail newsletter. But SBA also has an outline bank and other resources on its website.⁷ Less obviously, students can contact their SBA president and other representatives with questions. Like your local state senator, SBA people may be

6 See UVA Student Council, *Applying for CIO Status*, <https://www.uvastudco.com/org-rec> (last visited March 12, 2023).

7 See <https://www.uvasba.com/>. SBA also has a Twitter account, @UVASBA, but it has been silent since 2020.

more informed about how the Law School runs and what's going on behind the scenes, so it can be worth pulling one of them aside.

So What?

Having learned about SBA's functions, you may be wondering what this means for you. Well, one takeaway is thankfulness. SBA does a lot to represent you behind the scenes—they give you free outlines, and, if nothing else, they are a very competent party-planning crew. But should topics other than gratitude cross your mind, why don't you let your representatives know how they can better serve you? Cerja plans to give affinity groups better representation on the Diversity Advisory Committee and to set up an anonymous Google Form for event feedback so that the disaffected don't have to resort to Reddit tirades. But the most straightforward path of communication hasn't gone away either: Simply reach out to your president, or another elected official, such as your class senator. During Desai's term, students would typically contact her multiple times a week on a variety of topics—including everything from airing grievances to asking about how to reserve a room. You're only an email away.

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Long Distance Love Languages: The Sequel

Julia D'Rozario '24
New Media Editor



A year ago, I wrote an article called "Long Distance Love Languages"¹ about keeping in touch with old friends. It was objectively mushy and very niche—basically just a love letter to my childhood best friends—but it resonated with some who read it. I wrote about the beauty of old friendships and the unique connections that grow when you've known someone for what feels like a lifetime.

Sometimes, I feel like my friends know me better than I know myself. They still see me as I was when I was a kid, unclouded by whatever circumstances are currently preoccupying me or affecting my demeanor. Maintaining connections with old friends takes work, especially when there's distance involved... but it's so incredibly rewarding. I'm grateful every day for how close we've stayed over the last decade and a half.

In last year's article, I shared three tips for maintaining friendships across time zones, countries, and continents. Today, inspired by my spring break, I'm sharing two more:

1 See Julia D'Rozario, *Long Distance Love Languages: The Definitive Guide to Keeping in Touch with Old Friends*, Virginia Law Weekly Apr. 6, 2022, at 3.

1) Plan a trip.

Over spring break, I had the opportunity to go on holiday with my friends. It was an absolute dream come true (not to mention, it was literally the only thing in the world that could have granted me the strength to return for another half semester). It was a complete reset—I didn't realize how unrested I had been feeling.

I think the emotional reset came from getting to spend a week just *being*, without "performing."

I don't mean "performing" in a bad way. I don't know if this is just me, but I feel like I became an actual person when I was... seventeen? Maybe sixteen. It took me that long to become comfortable with the little behaviors and niceties that make up human interactions. Children don't instinctively have the self-awareness to understand how they're being perceived by others and to adopt habits that align with the society around them. They're just sweet, chaotic little monsters, running around with limited impulse control and emotional regulation, being completely themselves without regard for what it means to exist amongst people. By the time we get a little older, we learn how to "perform"—how to keep being social when our battery runs out, how to make small talk without looking distracted, etc. It's a good thing. But it's exhausting.

The thing about friends who knew you before you knew

how to perform is that... you don't have to perform. You know each other's social battery life, so there are no hard feelings when one person goes to bed at 6 p.m. They know the subtle difference between your "ask-me-what's-wrong" face and your "don't-ask-me-what's-wrong" face. You don't need to explain anything because they know your quirks already.

The lack of performance allows you to revert to a sort of childlike consciousness, which leaks into the rest of your life. I experienced the week with more wonderment than I've felt in years. Every laugh was a full-on fit of giggles.

2) Take so, so many photos.

The passage of time is relentless, and human memory is extremely imperfect. I feel like I graduated middle school yesterday, but I know logically that many of the memories I hold dear are distorted.

Even worse, I know that many of the joyful, funny, silly moments I've experienced in my life are forgotten. This became abundantly clear to me on my holiday. Two of us were discussing a school trip we had been on twelve years ago, and our memories overlapped so much less than I thought they would for having been on the exact same trip.

I remember leaving Nutella in the panini maker, attracting thousands of ants into the house, and laughing about it until our sides hurt; she had

no memory of Nutella paninis. She, on the other hand, remembered watching the sun set over a beautiful black sand beach. Apparently, I was right there and loving it, but I unfortunately had no memory whatsoever of any beautiful black sand beaches. Now, I wouldn't trade my Nutella panini memories for anything in the world—but I can't help but feel disappointed that I've apparently experienced joy that no longer "exists" in my mind. Is an experience still life-changing and memorable if it doesn't change your life and isn't retained as a memory?

This is where photos come in. Don't underestimate the power of visual stimuli. One seemingly random photo can open the floodgates to a million buried memories. Looking back more than a decade in my camera roll, I found a picture from the trip—a nondescript selfie on a nondescript field trip bus—and it's like something unlocked. I remembered where we went on that bus (a black sand beach). I remembered a tree house, which my friend remembered, too. I remembered a million other tiny, happy moments.

I strongly believe that cherishing these moments—by holding on to the ones that have passed and continuing to create more—is a cornerstone of lasting love.

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A Charlottesville Crash Course for Admitted Students

Ethan Brown '25
Features Editor



For two days, on Thursday, March 16 and Friday, March 17, several hundred individuals admitted to our dear Law School will descend on Charlottesville for a jam-packed forty-eight hours of seminars, information sessions, mock classes, and networking. When I attended Admitted Students Weekend (“ASW”) last year, I absolutely loved it. I came away from the experience feeling extremely excited about the prospect of attending UVA Law, and I hope that every admitted student who joins us this year feels the same way.¹

But I also remember feeling a little disappointed that I hadn’t been able to spend any time exploring the area during my visit.² So, in the hopes that some plucky admitted student picks up a copy of this week’s *Virginia Law Weekly* as they meander around the school, desperately

trying to find Slaughter Hall,³ here are my tips for maximizing any free weekend time in Charlottesville:

Go to Cou Cou Rachou.

This is the first item on the list because it is unquestionably the most important. Cou Cou Rachou is a delectable French bakery just a five minute drive from North Grounds, and if you have a car and more than 300 seconds of free time during your stay in Charlottesville, you simply must go. The vibes are immaculate, the pastries are delicious, and the outdoor patio is precious (and warm!). I recommend stopping by and grabbing their cardamom braid as well as their egg and spinach quiche, because if you have to spend your travel stipend for ASW on something, it might as well be a pleasant breakfast.⁴ I evangelize this restaurant like nobody’s business, and since I’m a “journalist” in the most charitable sense of the word, you can trust me.

Check out Main Grounds.

UVA Law students sit in our little brutalist ivory tower up here on North Grounds, and by virtue of our building being a mile or so away from

1 Except the ones who come to ASW and subsequently feel the compulsive need to tell every person they meet that they’re deciding between here and Harvard. I don’t need y’all messing up the vibe.

2 Which, to be fair, I knew I would not see much of during my first year of law school. But don’t undersell the significance of liking the place you’re about to spend three years of your life living in!

3 See Ethan Brown During His Own ASW, March 17, 2022.

4 Don’t forget your travel subsidy, y’all! ASW attendees get up to \$400 reimbursed, with no need to produce receipts, depending on geographic origin.

Main Grounds, we rarely have to interact with the University’s undergraduate population. On the whole, I consider that to be a pretty fantastic attribute of UVA Law. But I highly encourage all admitted students—particularly ones who haven’t been to Charlottesville before—to at least take a short stroll around Main Grounds, particularly The Lawn.

If you’ve seen any UVA promotional material in your life, you’ve seen the Rotunda and The Lawn, and very rightfully so. These historic portions of UVA’s undergraduate campus make up one of only twenty-four UNESCO World Heritage Sites in the United States. I’m lowkey an architecture nerd, particularly when it comes to colleges and universities,⁵ and UVA takes the cake in creating a captivating common space at the heart of its campus. I make a point of going through Main Grounds on my morning runs, so I see it often. But even if you aren’t planning on making frequent stops to the undergraduate campus during your time here, I recommend checking it out at least once. I promise it will get you excited about joining this institution.

Stroll around Ragged Mountain Natural Area and Reservoir.

This is genuinely the most embarrassing sentence I’ve written in the *Law Weekly*, and this is coming from the man who somehow managed to write 2,300 words about *The White Lotus*.

Another stone’s throw from North Grounds is Ragged Mountain, a beautiful outdoor space with hiking and biking trails, ample parking, and stunning views of the Charlottesville metropolitan area. While I have my designated areas around Charlottesville for my trademark Hot-Gay-Boy Walks,⁶ Ragged Mountain is my go-to place for more solemn and reflective walks, the sort we all inevitably have when the stress of law school and the fear of eventual oblivion set in. I know that might not sound like the greatest sales pitch. But it’s still a gorgeous place for a stroll!

See how people here actually interact with each other when the dust of ASW settles.

This is probably the hardest thing to do with limited time, but the point of ASW is to show prospective students that their lives at UVA Law will not only be tolerable, but enjoyable. I think that our Admissions Department does a great job of doing that, but obviously, every law school puts a veneer on things—until you matriculate here, or at any other institution, it’s hard to encapsulate the intangibles of a law school experience. And at risk of seeming like too strong of a simp for UVA Law, which I deeply fear will undermine my credibility as this paper’s pre-

mier snarky satire writer,⁷ I do think this Law School is special.

People here generally like each other. We aren’t competitive, or at least not in a way that’s toxic, like it is at other schools. And by and large, even though law school is stressful, almost everyone I know is still happy to be here. It can be difficult to see those intangible elements for yourself, even as you’re told them over and over again by professors and administrators during ASW, so try and stick around the Law School for a few minutes once it’s over on Saturday. You’ll see people spending time with each other and actually seeming to like each other’s company; you’ll come across the clusters of 1Ls studying and helping each other through tough Property cases; and you’ll bear witness to the moments of unadulterated joy, like those that come from the discovery of a loose Starburst on the floor outside Student Affairs. These small moments make UVA Law the special place it is.

With that, I wish all ASW attendees the happiest of stays in Charlottesville and the best of luck wherever their law school admissions journey takes them, though I sure hope it ends in a return trip to C’ville this August.

7 A self-appointed title.

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6 TikTok hasn’t caught onto them yet, smh.

Naked Mole-rats: Mammals or Aliens?

Jonathan Peterson '23
Staff Editor



If Dr. Evil was to own a rodent, it would be the naked mole-rat. *Science’s* vertebrate of the year in 2013, the naked mole-rat is perhaps most well-known for its hairlessness. However, this mammal has a variety of other characteristics which are less well-known, yet each are crazier than the last. Ranging from being one of the only eusocial mammals to being nearly completely cancer resistant, these mammals are perhaps more alien than any other mammal on Earth.

Description

Naked mole-rats are found in the drier parts of the tropical grasslands of East Africa, predominantly southern Ethiopia, Kenya, and Somalia.¹ These insectivorous and xenophobic mammals are small, with individuals typically ranging between three and four inches long and weighing 1.1 to 1.2 ounces. They have small eyes and poor eyesight as a result of living in low-light tunnels which can stretch up to three cumulative miles. However, their short and thin legs are highly adept at maneuvering

in this environment and allow them to move backwards just as quickly as forwards. And, in order to help them dig, over a quarter of the total musculature of the naked mole-rat is devoted to shutting their jaws. Further, their front teeth protrude outside of their mouths, allowing their lips to seal behind their teeth while digging. This prevents the rodent from swallowing much of the dirt that it excavates. These small rodents are, as the name suggests, almost completely hairless and have loose and wrinkly skin. And that’s about everything “normal” about the naked mole-rat.

Society

One of the most bizarre facts about the naked mole-rat is that it is one of the only eusocial mammals in the world. Eusociality describes how a species is structured socially. Common examples of eusocial animals are ants, termites, and some bees and wasps. Some of the essential traits of eusociality is caring for young and labor divisions. Naked mole-rats express both of these characteristics.

Naked mole-rats are divided into roughly two social castes: reproducing and non-reproducing. Each colony has one queen and between one and three reproductive males. Queens are significantly larger than the other members of the colony, clocking in at about 1.8 ounces, with some recorded weighing as much as 2.8 ounces. However, these morphological differences are not pre-existing in naked mole-rats

who eventually become queens. Studies done on queens before and after they attained the position reveal that, prior to being a queen, they are the same size as the rest of the colony. So, the size of a queen is not a result of pre-existing morphological differences between individuals, but rather it is the result of the attainment of the position itself. In simpler terms: it isn’t that big naked mole-rats become queens, but that when a naked mole-rat becomes a queen, it gets big.



Photo Credits: <https://theconversation.com/meet-the-naked-mole-rat-impervious-to-pain-and-cancer-and-lives-ten-times-longer-than-it-should-118809>

Queens attain their position either by founding new colonies, fighting for the dominant position, or stepping in without conflict once the reproducing female dies. Because of the potentially violent transitions of power in naked mole-rat colonies, queens are extremely hostile to other females that begin behaving like queens or producing the hormones necessary to become a queen. This is not true of reproducing males, however. These males are selected by the queen herself and may have relationships with the queen that

last for many years while the other members of the colony remain sterile.

The second broad group of naked mole-rats are the workers. Worker’s roles are decided along a continuum of behaviors as opposed to distinct groups. For example, larger naked mole-rats typically spend more time defending the burrow from invaders, whereas smaller naked mole-rats will spend more time tunneling, harvesting food, and caring for young. Despite this size-based division

have role overlap with frequent workers, however they perform tasks at a much slower rate. So, they’re either lazy or simply inept.

Finally, and in my opinion, most interestingly, there is a third discrete group of naked mole-rats within this social structure: the dispersers. For lack of a better way to say it, I am astonished that a role like the disperser has managed to form in a mammalian culture. Living in a society with a single queen breeding with one to three other males leads to a high statistical chance of experiencing the harms associated with inbreeding. Couple this with the fact that, if a colony does well, this setup will continue down from mothers and fathers to sons and daughters, ideally forever. So, the disperser’s job is the direct opposite: outbreeding. These naked mole-rats are, relative to the other sterile workers in their colony, “[b]ig, fat, lazy, and sexually-charged.”² However, despite being the horniest of the working class, these rodents have no desire to mate within

of labor, naked mole-rats do not divvy behaviors up into discrete groups, like some other eusocial animals. For example, a naked mole-rat that was tunneling one day might be defending the colony the next and raising young the day after that.

Another division in naked mole-rat society exists within the working class—there are “frequent” and “infrequent” workers. Frequent workers are, as their name suggests, frequently working at tasks like foraging and nest building. Infrequent workers, however

2 Lindell Bromham & Paul H. Harvey, *Behavioral Ecology: Naked Mole-rats on the Move*, 6 *Current Bio* 1082, 1082 (1996) (available at [https://www.cell.com/current-biology/fulltext/S0960-9822\(02\)70671-4?returnURL=https%3A%2F%2Flinkingub.elsevier.com%2Fretrieve%2Fpii%2FS0960982202706714%3Fshowall%3Dtrue](https://www.cell.com/current-biology/fulltext/S0960-9822(02)70671-4?returnURL=https%3A%2F%2Flinkingub.elsevier.com%2Fretrieve%2Fpii%2FS0960982202706714%3Fshowall%3Dtrue)).

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 editor@lawweekly.org.

1L Students

v.

Virginia Law Review et al.
75 U.Va 18 (2023)

ALLEN, J. delivers the opinion of the court, in which BROWN, J., ADEL, J., D'ROZARIO, J., SANDU, J., and ALLARD, J. join.

COLEMAN, J., concurring in part.

MORSE, C. J., dissenting.

Allen, J. delivered the opinion of the court.

I. Factual and Procedural Background

The case before this Court concerns one of the quintessential facets of the law school experience—journals. 1L students have recently completed the Unified Journal Tryout, submitting their personal statements, along with their editing and writing components, to be judged against one another in a process much akin to law school admissions. Several 1L students, as representatives of their class, have filed an emergency application alleging multiple procedural defects which combine to deprive them of their due process. Petitioners seek to prevent grading of their submitted materials, along with an injunction requiring changes to the tryout process. We granted a temporary stay in order to consider arguments on the merits.

II. Discussion

The first question is an issue of standing. Students allege a harm based on the inconsistency of dates listed in communications on personal statement prompts, resulting in the deadline for these statements being pushed back. Additionally, those running the journal tryouts originally indicated that no physical copies would be produced, with students left on their own to print nearly two-

hundred pages of material if they desired. They eventually changed course, providing hard copies which had to be picked up and returned at specified times. In both these behaviors, Petitioners allege they suffered harm insofar as their ability to complete the requirements of the journal process was impaired due to uncertainty and changing circumstances, forcing them to change plans.

Defendants counter that no harm actually occurred, as all changes or uncertainty were eventually resolved in Petitioners' favor. Further, even

conceding a harm, no remedy is available from the Court to redress the harm, as forcing students to engage in another round of journal tryouts would surely inflict *more* harm to the class.

These objections are well-taken and would likely prevail in a lesser court. However, the Court of Petty Appeals derives its jurisdiction from pettiness. What complaints are pettier than those which lack a reasonable solution? As such, these standing objections only strengthen Petitioners' case and reinforce the authority of the Court to hear the dispute.

Having considered the positions of the parties at argument, the Court *sua sponte* raises the issue of the originalist understanding of due process requirements for journal tryouts. The earliest law review was founded in 1852,¹ and journals

¹ It was only Penn, but it still counts. <https://www.pennlaw-review.com/about-the-law-re->

were thus known at the time of the Fourteenth Amendment's passage in 1868. Some argue that due process requirements are not fixed to those existing at the time of passage, either evolving over time or allowing for limited changes that reflect longstanding historical practice. While these concessions square with reality and allow for the functioning of society, we must reject them and insist on a return to the procedures known in 1868.² I do not know what these procedures were—I am no historian. I presume it would require handwritten edit-

ing and writing components, as computers are a modern invention. Students probably wrote in cursive back then, so that will be required as well.

The Court recognizes that such a requirement is backwards, obnoxious, and unreasonable. Unfortunately, our hands are tied by the interpretive methodology we have chosen to accept and apply, which compels this outcome. Accordingly, we hold that in all future journal tryouts, the procedures need to conform to those employed in 1868, leaving to journal administrators the task of discovering what such procedures were. Additionally, we require the administrators to do a better job proofreading the materials and information provided to 1Ls to ensure dates are correct. Given the emphasis on editing and accuracy which

view/.

² See Thomas, J., dissenting (citing Thomas, J., dissenting).

the tryout process demands, and which journals expect from their staff, we can require nothing less.

Coleman, J., concurring in part.

The originalist methodology employed by my Brother Allen is obviously correct. But I am forced to write separately, as I would never defer to historians. Instead, it is the duty of this Court to clearly state what the law was in 1868.

The lens through which we look is this: *the plain meaning*

of the due process clause to an educated reader in 1868. The next step is to determine who you would like to win. As I regularly dine with 1Ls and have yet to be invited to the *Virginia Law Review*, I choose Petitioners. Finally, I now choose which historical documents support my preferred outcome.

But Brother Allen's deference to historians makes this methodology unpredictable. For example, there is debate among historians as to what powers the Presidency was actually delegated. If I were to come to a measured conclusion based on the weight of that evidence, then it would destroy my ability to pick between various Federalist Papers or dictionaries based on the political views of the sitting President. This is an untenable state of affairs because historians are far too squishy in their conclusions, and the law needs bright-line rules.

While imposing the standards of 1868 onto present-day journal tryouts is well and good,

as it redounds to the benefit of Petitioners, one must never forget that it is the Justice who is empowered with that insight into the past.

Morse, C.J., dissenting.

All that is old, is new again. So it is, that once again the burden falls upon the more experienced members of this Court to explain to both 1L petitioners and 1L members of this Court the error of their ways. In both instances the result, as always, is that 1Ls lose.

For one thing, every single thing that Petitioners misdiagnose as a harm was experienced by the current 2Ls. Confused and sometimes contradictory communications? Check. Having to pick up and return printed materials at specified times and locations? (Gasp). Check. But again, all of this is mere tautology. Petitioners are 1Ls, and under our precedent they lose.

The Majority's analysis is no better. First, as heartening as it is to know the 1Ls of this Court have heard the words *sua sponte* and have a tenuous grasp of the English language, they conflate *sua sponte* with a freedom from *stare decisis* (this is what happens when you let 1Ls write opinions). They ignore this Court's most important, and oft-repeated precedent: 1L's always lose. Any other result is irreconcilable with the very foundation of this Court.

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Faculty Quotes

K. Kordana: "I'm hypothetically a monk in 1350. That's a standing question."

M. Collins: "If I remember Con Law...I don't."

M. Livermore: "Everything that was bad in the eighties is back to haunt us, right?"

A. Bamzai: "I ensure that we have robust employment in the IT department."

R. Harmon: "Where are my hands?"

J. Mahoney: "Brick is good. Brick is great. This guy is whining about fruit trees."

A. Woolhandler: "It's like sending a letter to your congressman: It doesn't matter that much."

K. Abraham: "I don't need advice like most people do."

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

INTERESTED IN JOINING THE LAW WEEKLY?

Meetings Every Monday at 5:30pm in SL279

New Editions Every Wednesday

Make Friends, Enemies, and Memories to Last a Lifetime

WELCOME
continued from page 1

I would be remiss if I did not commend the remarkable stretch of stable leadership⁴ the *Law Weekly* has enjoyed during my time here. I am deeply indebted to the efforts of Chief Justices Emeriti Phil Tonseth '22 and Dana Lake '23. Under their watch, this paper has weathered the many ups and downs of the last few years and come out smelling like roses. From their able stewardship, we have learned that with the help of a fictitious lawsuit, or even a snarky ANG, we can handle anything that law school throws your way.

My goals as Editor-in-Chief are simple. First, not to mess it up. This paper has been running for seventy-five years, has been cited by the Supreme Court, and has survived COVID-19 Zoom School. Second, I want to ensure that this paper continues to reflect the best things about UVA Law: the diverse interests of its students, faculty, and staff; our famed collegiality and generous spirit; and most importantly, the savage wit of the *Law Weekly* editorial staff. Joining me atop the colophon are Andrew Allard '25 as Executive Editor, Garrett Coleman '25 as Managing Editor, Monica Sandu '24 as Production Editor, and

⁴ This is strictly descriptive of their management of the paper. I make no commitments regarding Phil's stability, otherwise.

Ethan Brown '25 as Features Editor. May our reign be long and peaceful and prosperous for our people.

The strength of our newspaper, like that of the Law School, is defined by what our members put into it. My request of you is this: help us to continue to serve the UVA Law community. Whether it is by sending emails to editor@law-weekly.org to let us know what you thought of the most recent issue, sending tips on important goings-on around the school, sending letters to the editor criticizing our coverage of an event, or even taking the reins and publishing a guest article—this paper is here for all of you, and in the immortal words of Tom Wambsgans, “we hear for you.”

Of course, the best way to wield limitless power make a positive impact is to join the *Law Weekly*! So, if you have an interest in improving your writing skills, if you think there is an important issue in our school community which deserves more coverage, if you crave the attention of a captive audience, or if you just really want free pizza every Monday night,⁵ come join the best journal at UVA Law.⁶

⁵ Again, at 5:30pm in SL279. Just making sure you got that.

⁶ This is, of course, an entirely objective assessment, based on the frequency of our publishing, the strength of our editorial staff, and how much cooler we are than *Law Review*.

5 Ways to Spend \$500

Dana Lake '23
Former EIC



Bar course signup season has ended, and actual bar prep season fast approaches. While Themis and other companies open the gunner doors at the end of March for early studiers, the recommended start date in May looms large in the distance. And what better way to prepare for bar prep than to instead turn our attention toward online shopping?

If you received a gift card as part of your incentive package when choosing a bar course, check the expiration date. For Themis, the expiration date is six months from activation, which puts it right at the end of May for most people.

Law students don't need to be told how to spend a couple hundred dollars. We blow through money like no other group of people. But there are ways to spend a bonus that won't necessarily expand the amount of stuff you have to schlep across the country when you start work next fall.

Whatever your feelings on the use-it-or-lose-it strategy these companies employ, we can all agree losing it isn't an option. If you haven't been spending it down over the last few months and still have a bunch of funds left, here are five ideas to help you meet the deadline.

Money Laundering

This is the preferred method if you aren't looking to actually buy 500 bucks worth of stuff right before you have to pack up your whole life and move after graduation. Use your card to cover a group online food order, or some other shared cost, that people will Venmo you for. In one easy move, you have converted your highly restrained virtual gift card into actual money that won't expire. If your friends are also a bunch of law students with their own gift cards to use up, you can beat them to the punch, thanks to your loyal *Law Weekly* readership.

Buy a Gas Card

This sort of transfers the problem from one gift card to another, but at least a gas card won't expire. Pre-pay for your summer driving (and summer road-trip snacks) with a card from Wawa or your gas station of choice. Most let you buy in whole-dollar increments, so if you haven't touched your card at all, you can do a clean transfer of all \$500.

Online Grocery Shopping

Walmart+, Whole Foods, and other grocery stores that let you order online for pickup or free delivery are an easy way to save money on a bill you were already going to have anyway. If you have a pet, stocking up on their food so they don't starve while you're

lost in the bar study haze is another option. You can spring for a new water fountain and keep them hydrated through the summer, or if you have a cat, you can try out the fancy cat litter that you would never normally buy.

Pure Consumerism

Well, why not. Treat yourself, as the millennials say. It isn't often you get a couple hundred dollars earmarked specifically for fun treats; if you are an anxiety shopper, limiting your finals-induced purchases to only the gift card is a way to use it up and also avoid spreading the consumerist contagion to the rest of your bank accounts. A new outfit for graduation, a fancy bag for commuting to the office, various AliExpress impulse purchases—the options are endless. Get ahead on your Christmas or birthday shopping, or buy that pricey crafting item you've never been able to justify. Buy an aerogarden and some cool plant pods to bring some greenery and joy into your miserable study den/hovel. The dopamine boost of a new package on the way might be just what you need to keep up your motivation for one last spring semester, and having to go out and pick up the box will at least get you walking once a day.

THEMIS page 6

HOT BENCH



Dana Lake '23
Deposed Tyrant
Interviewed by Nikolai Morse '24

Dana, it is my honor to be interviewing you for your first issue as Editor-in-Chief (“EIC”) Emeritus. Let me remind you, you no longer have any editorial immunity, and the Court of Petty Appeals (“COPA”) is always looking for fresh defendants. Now, let's get down to business. Where are you from and why did you come to UVA?

I'm from Jupiter, Florida. I lived in South Florida pretty much my whole life before law school, including for undergrad (go Gators). I worked in publishing for a few years and hit a professional ceiling, where my choices were to really double down on publishing or make a pivot into something else. As much as I loved publishing, it's an industry with pretty low salary caps. Transactional work is a lot of the same skill set with a much better compensation scale,

and a law degree really gives you a lot of freedom in the career choices you can make.

You've been part of the *Virginia Law Weekly* since you were a 1L. When did you start plotting your coup d'état thinking about running for EIC?

Oh, from day one. When I told [20-'21 *Law Weekly* EIC] Christina I had InDesign experience, the gleam in her eye told me I was going to be more involved, whether I wanted to be or not (lol). I really enjoyed being Production Editor on the '21-'22 editorial board, and I used that time to mine the previous EIC for all the insider tips he had on the job. I have zero desire to litigate or become a judge, so I had to at least seize the opportunity to be Chief Justice of the Court of Petty Appeals.

Each EIC brings their own personality, style, and priorities to their reign atop the *Law Weekly*. You were definitely known for your efficiency. What would you say was your biggest priority or the impact you are most proud of?

Efficiency is a legacy I can be happy with! My biggest priority was to recruit a larger editor pool to replace the big group of 3Ls leaving this year. Other org leaders know the pressure of keeping the pipeline flowing and how far-reaching the impact of a bad recruiting year is. I keep saying it, but only because it's true: The *Law Weekly* needs a wide variety of voices to really capture the Law School experience. A small, tight-knit group is a lot of fun to work with, but a lot of different contributors ultimately makes the paper better.

Of the many articles you wrote

over the last three years, I have two favorites. The first is your very first COPA majority, *Loiters v. The Powers that Be*, 73 U.Va. 14 (2021), and the second was not an article at all, but an heroic effort to fill unexpected blank space in the October 19, 2022 edition, titled “The End of the Line.” What is your favorite article that you've written?

That COPA is a real throwback! It was written passionately, directly from the heart of someone who basically lived in Brown 121 during 1L fall. That was one of the roughest springs of my life, and losing out on that little bit of community was a disproportionately tough blow to weather.

My favorite piece has to be “Ode to Tiny Door,” which (unlike that COPA, which took me days and days) I wrote all in one shot in probably fifteen minutes while in a total fugue state. Those thoughts had been bouncing around my head for months by the time I was ready to put them to paper and send them out into the world.

A close runner up would be a financial advice article I wrote with the help of Dean Hulvey. She was so welcoming of me going and pestering her with questions. Anyone who is unsure about the massive amounts of money they will be making after law school, or the massive amounts of debt they are in, should definitely talk with the Office of Financial Aid.

The last year has had some notable ups and downs, and you had a unique perspective as EIC of the most powerful publication at UVA Law. What was the most surprising aspect of your time as EIC?

The most surprising thing to me, over and over again, was that people read the paper. There is a total dis-

sociation in my head between writing and designing and printing and putting the paper out, and the fact that people will then read (and enjoy!) this thing we have created. Seeing students with copies of the paper in the hallway, receiving emails from former EICs about current editions, Student Affairs playing along with COPA orders, hearing about professors angling to get into the quotes box—it never fails to make me really happy.

You wrote several articles advising students on how to live their best lives, including how to fully embrace home-cooking, how to be financially responsible with your summer associate money, and when it is time in November to “get it together.” Are you an eldest sibling, or are you just a natural purveyor of wisdom?

I'm a younger sister; I'm just really bossy. The paper gave me a platform to force my worldview onto a wider group of people, which I definitely took full advantage of.

As you know, we need some new editors to replace the many incredible graduating 3Ls. What is your pitch for law students to join the *Law Weekly*?

It's fun! It's a Law School tradition! It's good for your mental health! It's better for your resume than any journal!

Lightning Round!

Any shout outs?

Weekend Thursdays, of course.

Zodiac sign?

Capricorn, predictably.

How do you take your coffee?

Milk, no sugar.

Favorite study spot?

At home with my two cats curled up nearby.

Post-grad plans?

Big Law in Houston and becoming an Astros fan.

Dream job? Other than EIC, of course.

Working for the Federal Energy Regulatory Commission would be really interesting, but if I were doing something outside the law, I would be a chef.

How have your free Mondays been so far?

I haven't had one by the time of this writing, but I am looking forward to being better able to pregame The Bachelor finale.

Any (much-needed) advice for the incoming EIC?

I hear he's a pretty cool guy with a good head on his shoulders, so I'm sure he'll be fine. The *Law Weekly* is a dictatorship, but you have an editorial board for a reason—don't hesitate to lean on them when answering the big questions that will come your way (like who will pick up the pizzas on Monday).

MOLE-RAT

continued from page 3

their own colony. Instead, they are born with significantly higher fat reserves and are massively different hormonally. Both of these factors make them capable of and more likely to depart from their colony in search of, you guessed it, sex. Not only are these naked mole-rats born to leave, but they seem to never fit in while they stay—they are lazy and work poorly with the group. What I find to be most interesting about this is wondering how this mechanism to avoid inbreeding developed.³ This is because the existence of a disperser has no direct benefit to the naked mole-rat colony the disperser originates from—the disperser simply leaves and benefits a different colony by increasing its genetic diversity. This reaps no rewards for the disperser's original colony.⁴ In

3 This is incredibly important for naked mole-rats, because two colony mates (i.e., a queen and a reproducing male from the same colony) are more genetically similar than siblings in species that outbreed. In fact, the only way they could be more genetically similar is if they were monozygotic twins—or twins that originate from the same fertilized egg, and thus share identical DNA. *Id.*

4 This is not, however, unique to naked mole-rats. Termites, for example, have winged dispersers. I believe that ant colonies also produce winged dispersers. What I find

fact, the only way the original colony could benefit from the existence of this role is if they are lucky enough to have another colony's disperser drop by for a little afternoon delight.⁵

Despite this being the end of this article, there are countless other facts about the naked mole rat that I have not covered here. Accordingly, I will be releasing another article, *Naked Mole-rats: Mammals or Aliens Part Two—Definitely Aliens*. In that article, I will discuss some of the most absurd physical features of the naked mole-rats, including their unique style of thermoregulation, lack of pain sensitivity in their skin, extreme resistance to cancer, ability to survive in obscenely low oxygen levels, and their incredible longevity.

absurd is that this behavior has developed in a eusocial mammalian culture.

5 This joke shouldn't be meant to imply that dispersers are roving sex addicts; they depart their colony, find a new one, and remain with it until their death.

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ABORTION

continued from page 1

send the issue up to the Fifth Circuit, issue a district-wide injunction, or issue a nationwide injunction.

A complicating factor—and a potential pathway for pro-choice activists—is that there are other recognized medical uses for MIFE and MISO. According to Professor Cahn, the former can be used to treat complications from miscarriages, and the latter is used to treat gastric ulcers. Professor Cahn likened this to how condoms also prevent disease, or how contraceptives are arguably designed to regulate other functions. In the face of increasing scrutiny from those wishing to restrict abortion, these alternative functions will be important.

When the discussion shifted to the potential fallout from this case, Dean Gould raised the concerns of surgical abortion providers. As the primary alternative to the more common medical abortion, she was concerned that there would be a huge influx of surgical abortion patients following restrictions on MIFE. She also said that there will be a “bottleneck . . . at the provider level.” Some of that is attributable to the medical school practice of making abortion an optional training. And some of it can be traced to the generalized fear of doctors that they will be violating the law by providing abortions. Dean Gould also mentioned the implications of bounty laws

for abortion services that assist women in more restrictive states. Her view was that these organizations are under low risk when operating outside of the restrictive state's jurisdiction.



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THEMIS

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And as for the Left-overs...

What are you supposed to do with the odd amount of money left over at the end? Most online retailers don't let you split payments, but there are ways to spend exactly the amount left to get the most out of your gift card. Online donations to most nonprofits, for example, let you choose an exact amount to give, down to the penny. If you have a beloved NPR station you'd like to support (shout out to WLRN, South Florida's only NPR news station), or random GoFundMe's that look interesting, the odd forty dollars and change at the end of your card can make a real difference.

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Sudoku

	3	4			1	8		9
				7				
9		1		8	2			
				2		1	8	
		2	1		5	9		
	6	7		3				
			4	9		3		2
				5				
5		3	6			4	9	

Solution

8	6	4	7	1	9	3	2	5
9	1	7	3	5	2	6	4	8
2	5	3	8	6	4	9	1	7
4	2	5	6	3	8	7	9	1
7	9	6	5	4	1	2	8	3
3	8	1	9	2	7	5	6	4
5	4	9	2	8	3	1	7	6
1	3	2	4	7	6	8	5	9
6	7	8	1	9	5	4	3	2

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