

# CONFLICT U.

*TWO DOZEN FEDERAL JUDGES  
DID NOT RECUSE IN CASES  
INVOLVING THE UNIVERSITIES  
WHERE THEY TEACH*



**JULY 2025**

# Conflict U.:

## *Two Dozen Federal Judges Did Not Recuse in Cases Involving the Universities Where They Teach*

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Fix the Court

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## What We Found

**Fix the Court has identified 24 federal judges with part-time teaching jobs at law schools who have failed to recuse themselves in more than six dozen cases involving the schools' parent universities.**

It's possible the judges list or listed the law school on their "recusals list" ([here's](#) a prominent example of one) which, via software, prevents a judge from being assigned a case that includes a party that they believe poses a conflict.

But we believe the judges should also place the parent university on that list and step aside from any cases in which the university is a party.

Even if a judge-adjunct professes, as [several have](#), that the law school at which they teach is but "one small and virtually autonomous part" of the university, we believe that a neutral observer who sees, for example, "Ohio State Law adjunct" on a judge's financial disclosure report would look askance any time the judge presides over a case involving Ohio State. It's a clear "appearance of impropriety" problem, and it's also a problem in that judges should generally not hear cases involving the entities that are paying them (nearly all the judges mentioned in this report are or have been paid adjuncts).

Judges' unwillingness to recuse in these cases does the third branch no favors, especially at a time when judicial ethics is more closely being monitored by the general public.

## When Pressed, Judges Are Covering for Their Colleagues

The opposition to recusing comes both from the judiciary writ large and from judges themselves.

On the front end, the Guide to Judiciary Policy, Vol. 2, Ch. 3, Compendium of Selected Opinions, § 3.4-3(a) — which is not public because of course it's not, though the key passage has been cited in several opinions (mentioned [here](#) on p. 11) — says that a judge who teaches at a law school is not required to recuse in every case involving the university; rather, he or she should consider "**the size and cohesiveness of the university, the degree of independence of the law school, the nature of the case, and related factors.**"

**But this is nonsense.** Everyone knows that the Notre Dame Law School is an integral part of Notre Dame University, as are the law schools of Yale University, the University of Texas, the University of Colorado, and more to their parent institutions.

On the back end, judicial opinions in the last several years have permissively and embarrassingly allowed conflicted judges to stay on these very cases.

In 2020, Southern District of Ohio magistrate judge Chelsey Vascura, who teaches at Ohio State's Moritz College of Law, called the law school "one small and virtually autonomous part" of the university in an [order](#) denying a motion that she recuse in a case in which the parent university was a party. (That, of course, belies the fact that the law school sits on OSU's main campus and its students and alumni, like thousands of undergrads, [spell out](#) "O-H-I-O" with their arms and wear the [scarlet and gray](#) on fall Saturdays.)

In 2015, a different S.D. Ohio magistrate-adjunct, Terence Kemp, who refused to recuse in a case involving OSU, wrote in an [order](#), "The Court is reluctant to create [...] what would amount to **a rule of automatic recusal in every**

case involving the Ohio State University for judges who teach at the Moritz College of Law as adjuncts and on a part-time basis only.”

First off, you’re a judge; of course you’re only teaching part-time. **That aside, that’s exactly the rule that’s needed.**

Ohio State is welcome to file lawsuits in Columbus, but we should all accept that a judge who's on the OSU payroll won't be assigned to the case.

**The issue isn’t faring any better one step up in the appeals courts.** In 2023, a Sixth Circuit panel in *Garrett v. OSU* said that another S.D. Ohio judge-adjunct, Michael Watson, was not required to recuse in spite of his teaching at Moritz and his wife’s work as a vendor of officially licensed OSU goods. (Watson had previously [ruled](#) that he was not conflicted, and the plaintiffs appealed his spurious determination of his own bias.)

*By highlighting these relationships and cases, we hope that the missteps – i.e., the non-recusals – can be corrected or, in the very least, that future conflicts can be avoided.*

In its [ruling](#), the appellate panel wrote, “We join our sister circuits in concluding that recusal is not required just because a judge serves as an adjunct professor at the law school of a party-university,” p. 12, and cited opinions from the Third, Eighth and Eleventh Circuits in which judges who were law school adjuncts and didn’t recuse in cases involving the parent university were permitted to continue hearing those cases.

Once again, this does not pass the smell test. **Oher circuits blessing the unethical act doesn’t make it okay. Rather, it’s just another case of judges covering for other judges (of which there are myriad examples).**

The bottom line is that recusal is a vital part of the judicial process, and it is a judge’s responsibility to recuse himself or herself to avoid impropriety and any appearance of impropriety (see 28 U.S.C. 455(a)), especially when an entity that’s paying them money appears in their case files (see 28 U.S.C. 455(b)(4)).

## Some Judges Have Recused Or Hinted They Might Be Conflicted

In fact, two such recusals happened earlier this year. In preparing this report, we found that in June, District of Nebraska Judge Brian Buescher, who serves as an [adjunct](#) at Creighton University School of Law, recused from a [case](#) he was assigned to in which Creighton University was a party.

In April, a case in the Southern District of New York where New York University was the defendant and to which Judge John Koeltl had been assigned was reassigned to Judge Jesse Furman. Koeltl is an [adjunct](#) at NYU School of Law. Then last month, Furman recused, likely due to his NYU ties: a law school building is named after his father, and the judge is a frequent participant in campus events.

Two judges listed in this report ([Mary Rowland](#) and [Edmund Sargus](#)) asked the parties in a case whether they should recuse, and the parties either said no or did not object to the judge continuing to oversee the case. These examples show that some judges acknowledge that there may be a conflict and that they’d rather solve it than let it persist unrecognized.

We argue, of course, that it shouldn’t have gotten to that point and that the judges should’ve included the universities on their recusal lists, meaning these assignments wouldn’t have happened.

## What The Supreme Court Can Teach Us About Ethics (No, Really)

None of the cases involving the non-recusals referenced in this report have reached the merits stage at the Supreme Court, so the justices haven't directly considered the report's central question.

That said, **there are several relevant takeaways based on how the justices themselves have acted in similar circumstances.**

This spring, four Supreme Court justices recused in a petition, *Baker v. Coates, et al.*, because one of the respondents was the German media conglomerate that owns Penguin Random House, which has published or is publishing the justices' books. The case was not *Baker v. PRH*; it was *Baker v. A Company That PRH Is A Part Of*, kind of like how law schools are part of universities, even if they (like PRH) have some level of autonomy.

Second, and more to the point, both **Justices Neil Gorsuch** and **Amy Coney Barrett** appear to have viewed the parent universities of the law schools at which they formerly taught as conflicts.

In a 2017 [list](#) of recusals he prepared as part of his Supreme Court nomination paperwork, Gorsuch mentioned five cases involving the University of Colorado — Gorsuch taught at Colorado School of Law from 2008 to 2017 while he served on the Tenth Circuit — from which he stepped aside.

*Then-Judge Barrett and likely then-Judge Gorsuch viewed the law schools they taught at and those schools' parent universities as conflicts requiring recusal.*

It's possible that some of his recusals, which he says "implicated [his] financial interests," occurred due to his 2009 purchase of University of Colorado bonds.

It's also possible that "financial interests" refers to his paid adjunct position at the law school, which began a year before he bought the bonds.

For Barrett, the relationship between the law school and the parent university is even clearer. She is the sole justice whose lower court [recusal list](#) has been made public, and on it, **she lists both the "University of Notre Dame" and the "University of Notre Dame Law School"** as conflicts for which the case-assignment software would skip her — that is, would have her recuse.<sup>1</sup>

**If only the lower court judges mentioned in this report would do the same.**

### One Possible Solution

Though the report highlights 24 judges — 22 from district courts and two from circuit courts — it's likely that the problem is prevalent throughout the judiciary, given how often lower court judges are employed by their local law school. Again, case law aside, the obvious appearance of impropriety problem calls out for at least a modest solution. Here's an idea:

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<sup>1</sup> We don't know how many University of Notre Dame or Notre Dame Law School cases Barrett was assigned to or how many she recused from. Most Supreme Court nominees, like Justice Gorsuch, supply a list of cases from which they were recused while serving on a lower court, whereas Justice Barrett supplied a PDF of the physical conflict sheet she fed into the case-assignment software.

Under judiciary policy, chief judges must approve the teaching jobs of their judicial colleagues ahead of a judge's start date. That approval, under the Guide to Judiciary Policy, Vol. 2, Pt. C, §1020.35(d)(2) ([p. 8](#)), must include an acknowledgement from the judge-adjunct that his or her side gig is ethical.

Fix the Court hopes that when a chief judge signs an approval in the future, he or she will work with the judge-adjunct to ensure that **both the law school and the parent university are added to a judge's recusal list**.

These lists are to be updated twice a year, per the Guide to Judiciary Policy, Vol. 2, Pt. C, §410.30.20(g) ([p. 5](#)).

## Other Things to Keep in Mind When Reading the Report

It's worth mentioning that our report does not change the fact that the majority of the time, judges properly recuse themselves in cases that present potential conflicts of interest.

We also believe certain entities affiliated with a university do not need to be included on a recusals list. The main one is a university medical center, which may have the name of a school attached to it, but, even when it's a teaching hospital, it's fairly obvious that for the purposes of recusal, treating patients is a field unrelated to teaching students.

Like nearly all of the work we do, this issue is cross-ideological. **Judges appointed by Democratic and Republican presidents alike are not recusing when they should.** That was true of the award-winning 2021 *Wall Street Journal* investigation ("[Hidden Interests](#)") on missed recusals, as well.

In the list below, we've only included a judge's most recent financial disclosure (typically their 2023) but if, say, we include in our list of missed recusals a case from 2017, that means we've gone back in [one](#) of [two](#) databases, located their 2017 FDR and saw a line that states the judge taught at the school that year, and thus there was a conflict.

To identify these cases, we used federal court records available on Free Law Project's CourtListener database, as well as PACER, and limited it to district court judges and magistrate judges, save for two circuit court judges we found by happenstance (Judge Richard Leon of the D.C. Circuit and Judge Patty Shwartz of the Third Circuit).

In the instances where we note that a parent university "was a named defendant" but isn't listed in the case caption, that's because CourtListener and PACER sometimes truncate the "et al."

The report is not meant to be comprehensive but illustrative, showing that the problem we identify is widespread throughout the judiciary. In fact, **10 of the 13 circuits are represented in our report.**

## Conflicted Judges by Geography

### FIRST CIRCUIT

None\*

### SECOND CIRCUIT

Judge Victor Bolden (D. Connecticut)

Judge John Koeltl (S.D. New York)

Judge Robert Levy (E.D. New York)

### THIRD CIRCUIT

Judge Wendy Beetlestone (E.D. Pennsylvania)

Judge Karen Marston (E.D. Pennsylvania)

Judge Zahid Quraishi (D. New Jersey)

Judge Michael A. Shipp (D. New Jersey)

Judge Patty Shwartz (Third Circuit)

### FOURTH CIRCUIT

Judge Michael Aloï (N.D. West Virginia)

### FIFTH CIRCUIT

Judge Elizabeth Chestney (W.D. Texas)

Judge A. Joe Fish (N.D. Texas)

Judge Robert Pitman (W.D. Texas)

### SIXTH CIRCUIT

Judge Algenon Marbley (S.D. Ohio)

Judge Edmund Sargus (S.D. Ohio)

Judge Chelsey Vascura (S.D. Ohio)

Judge Michael Watson (S.D. Ohio)

### SEVENTH CIRCUIT

Judge Sara Ellis (N.D. Illinois)

Judge Virginia Mary Kendall (N.D. Illinois)

Judge Mary Rowland (N.D. Illinois)

### EIGHTH CIRCUIT

None\*

### NINTH CIRCUIT

Judge Jolie Russo (D. Oregon)

### TENTH CIRCUIT

Judge Norman Reid Neureiter (D. Colorado)

### ELEVENTH CIRCUIT

Judge Martin Fitzpatrick (N.D. Florida)

Judge Jose Martinez (S.D. Florida)

### D.C. CIRCUIT

Judge Richard Leon (D.C. Circuit)

### FEDERAL CIRCUIT

None\*

*\*Doesn't mean there aren't any, just that we hadn't found any by the self-imposed end-of-July deadline*



# The Judges

*(in alphabetical order)*

1. **Judge Michael Aloï (N.D. West Virginia, Magistrate)** is an [adjunct professor](#) at West Virginia University School of Law ([2023 FDR](#)). He has recently been assigned five cases in which West Virginia University was a party and from which he did not recuse:

(1) [Lee v. West Virginia University \(1:22-cv-00156\)](#). This case is still ongoing, and there are no recusals on the docket (filed 12/16/22, last filing 3/28/25). It was appealed to the Fourth Circuit in March. West Virginia University (parent university) was named as the defendant.

(2) [Farah v. West Virginia University Board of Governors \(1:22-cv-00153\)](#). This case was dismissed in March, and there are no recusals on the docket (filed 12/9/22, last filing 3/3/25). The West Virginia University Board of Governors, a stand-in for the parent university, was named as the defendant.

(3) [Young v. West Virginia University \(1:21-cv-00035\)](#). This case was dismissed in 2022, and there are no recusals on the docket (filed 3/15/21, last filing 4/20/22). West Virginia University (parent university) was named as the defendant.

(4) [Vickers v. West Virginia University Board of Governors \(1:15-cv-00081\)](#). This case was dismissed in 2016, and there are recusals on the docket (filed 5/15/15, last filing 10/24/16). The West Virginia University Board of Governors, a stand-in for the parent university, was named as the defendant.

(5) [Gingold v. West Virginia University, Board of Governors \(1:23-cv-00091\)](#). This case was dismissed in 2024, and there are no recusals on the docket (filed 11/13/23, last filing 10/29/24). West Virginia University (parent university) was named as a defendant.

2. **Judge Wendy Beetlestone (E.D. Pennsylvania, appointed by President Obama in 2014)** is an [adjunct professor](#) at the University of Pennsylvania Carey Law School, her alma mater ([2023 FDR](#)). She has recently been assigned one case in which Penn was a party and from which she did not recuse:

(1) [Hunter v. Trustees of the University of Pennsylvania \(2:20-cv-02334\)](#). This case was dismissed in 2021, and there are no recusals on the docket (filed 5/18/20, last filing 4/15/21). The Trustees of the University of Pennsylvania, which is a stand-in for the parent university, was named as the defendant.

3. **Judge Victor Bolden (D. Connecticut, appointed by President Obama in 2014)** is an [adjunct professor](#) at Yale Law School ([2023 FDR](#)). He has recently been assigned one case in which Yale was a party:

(1) [Bernard v. Yale University, 3:20-cv-00481, \(D. Conn.\)](#). The case was dismissed in 2021, and there are no recusals on the docket (filed 4/10/20, last filing 5/20/21). It's possible that Bolden began teaching at Yale in the fall semester of 2021, but by the end of this case, he would have known that he was headed to Yale and had at least half a reason to recuse. Yale University (parent university) was named as the defendant.



4. **Judge Elizabeth Chestney (W.D. Texas, Magistrate)** is an [adjunct professor](#) at the University of Texas at Austin School of Law ([2023 FDR](#)). She has recently been assigned one case in which UT-Austin was a party and did not appear to recuse:

(1) [Stamps v. University of Texas System \(5:23-cv-01520\)](#). The case (filed 12/12/23, last filing 5/1/25) was appealed to the Fifth Circuit last year, with the circuit issuing a judgment three months ago. Chestney presided over the case from Dec. 2023 to May 2024, during which no recusals appeared on the docket. Then a district court judge closed the case on May 15, 2024, and an order appeared on the docket later in the day stating, “Case no longer referred to Magistrate Judge Elizabeth S. Chestney.” That more likely signifies an end at the district level than a recusal. The University of Texas at Austin (parent university) is a named defendant.

5. **Judge Sara Ellis (N.D. Illinois, appointed by President Obama in 2013)** is an [adjunct professor](#), though an unsalaried one, at least according to her financial disclosures, at Loyola University Chicago School of Law ([2023 FDR](#)). She has recently been assigned one case in which Loyola was a party and from which she did not recuse:

(1) [Ramos v. Loyola University Of Chicago \(1:22-cv-00284\)](#). The case was dismissed in 2022, and there are no recusals on the docket (filed 1/18/22, last filing 12/4/22). Loyola University of Chicago (parent university) was named as the defendant.

6. **Judge A. Joe Fish (N.D. Texas, appointed in 1983 by President Reagan)** is an [adjunct professor](#) at the Southern Methodist University Dedman School of Law ([2023 FDR](#)). He has recently been assigned one case in which SMU was a party and from which he did not recuse:

(1) [Akel v. Southern Methodist University \(3:18-cv-03187\)](#). The case was dismissed in 2020, and there are no recusals on the docket (filed 12/3/18, last filing 7/13/20). Southern Methodist University (parent university) was named as the defendant.

7. **Judge Martin Fitzpatrick (N.D. Florida, Magistrate)** is an [adjunct professor](#) at Florida State University College of Law ([2023 FDR](#)). He has recently been assigned one case in which FSU was a party and from which he did not recuse:

(1) [Johnson v. Florida State University Board of Trustees \(4:23-cv-00385\)](#). The case was dismissed in 2024, and there are no recusals on the docket (filed 8/29/23, last filing 3/28/24). Florida State University (parent university) was named as the defendant.

8. **Judge Virginia Mary Kendall (N.D. Illinois, appointed in 2006 by President Bush)** is an [adjunct professor](#) at the University of Chicago Law School ([2023 FDR](#)). She has recently been assigned two cases in which the University of Chicago was a party and from which she did not recuse:

(1) [Doe v. University of Chicago \(1:18-cv-07429\)](#). This case was terminated in 2019. Court filings show that the parties discussed whether she should recuse, but ultimately, she remained on the case (filed 11/8/18, last filing 7/25/19). The University of Chicago (parent university) was named as the defendant.

(2) [Shine v. The University of Chicago \(1:12-cv-08182\)](#). This case was terminated in 2013, the same year Kendall began teaching at UChicago Law (filed 10/11/12, last filing 3/28/13). The University of Chicago (parent university) was named as the defendant.

9. **Judge John Koeltl (S.D. New York, appointed in 1994 by President Clinton)** is an [adjunct professor](#) at NYU School of Law ([2023 FDR](#)). Koeltl has been assigned to one case involving NYU as a party and from which he did not recuse (he did recuse in a 2025 case involving NYU mentioned earlier in the report:

(1) [Knoesel v. New York University \(1:11-cv-00061\)](#). This case was terminated in 2011, and there are no recusals on the docket (filed 1/5/11, last filing 4/29/11). New York University (parent university) was named as the defendant.

10. **Judge Richard Leon (D.C. Circuit, appointed in 2002 by President Bush)** is a [paid lecturer](#) at Georgetown University Law Center ([2023 FDR](#)). Leon has been assigned one case in which Georgetown was a party and from which he did not recuse:

(1) [Semprevivo v. Georgetown University \(1:19-cv-01400\)](#). The case was reassigned to Leon in May 2019 and was dismissed in July 2019. There are no recusals on the docket (filed 5/15/19, dismissed 7/16/19). Georgetown University (parent university) was named as the defendant.

11. **Judge Robert Levy (E.D. New York, Magistrate)** is an [adjunct professor](#) at NYU Law ([2023 FDR](#)). Levy has been assigned to one case in which NYU was a party and from which he did not recuse:

(1) [Lashley v. New York University \(1:22-cv-01054\)](#). This case was dismissed in March, and there are no recusals on the docket (filed 2/28/22, last filing 3/17/25). New York University (parent university) was named as the defendant.

12. **Judge Algenon Marbley (S.D. Ohio, appointed in 1997 by President Clinton)** is an [adjunct professor](#) at Ohio State University's Moritz College of Law ([2023 FDR](#)). Marbley has been assigned or referred to five cases in which OSU was a party and from which he did not recuse:

(1) [Aarnes v. Ohio State University \(2:24-cv-02146\)](#). This case is still ongoing, and there are no recusals on the docket (filed 5/3/24, last filing 7/29/25). The Ohio State University (parent university) was named as a defendant in this case.

(2) [Bryant v. Ohio State University \(2:22-cv-01966\)](#). This case was terminated in 2022, and there are no recusals on the docket (filed 4/15/22, last filing 8/17/22). The Ohio State University (parent university) was named as the defendant in this case.

(3) [EEOC v. The Ohio State University \(2:20-cv-04624\)](#). This case was terminated in 2023, and there are no recusals on the docket (filed 9/3/20, last filing 3/28/23). The Ohio State University (parent university) was named as the defendant.

(4) [Padgett v. Board of Trustees of Ohio State University \(2:17-cv-00919\)](#). This case was terminated in 2018. Marbley recused but shortly after [vacated](#) his own recusal motion, so the case remained assigned to him until its conclusion

(filed 10/22/17, last filing 3/6/18). The Ohio State University Board of Trustees and the President of OSU were named as the defendants.

(5) [Simmons v. The Ohio State University \(2:18-cv-00042\)](#). This case was dismissed in 2019, and there are no recusals on the docket (filed 1/16/18, last filing 5/6/19). The Ohio State University (parent university) was named as the defendant.

13. **Judge Karen Marston (E.D. Pennsylvania, appointed in 2019 by President Trump)** is an [adjunct professor](#) at Drexel University School of Law ([2023 FDR](#)). Marston has been assigned one case in which Drexel was a party and from which she did not recuse:

(1) [Doe v. Drexel University \(2:23-cv-03555\)](#). The case was settled in 2024, and there were no recusals on the docket (filed 9/13/23, last filing 3/19/24). Drexel University (parent university) was named as the defendant.

14. **Judge Jose Martinez (S.D. Florida, appointed in 2002 by President Bush)** is a [lecturer](#) at the University of Miami School of Law ([2023 FDR](#)). Martinez has been assigned to one case in which Miami was a party and from which he did not recuse:

(1) [University Of Miami v. Caneup LLC \(1:23-cv-23829\)](#). This case was terminated in 2024, and though two other judges recused, Martinez did not (filed 10/6/23, last filing 10/31/24). The University of Miami (parent university) was named as the defendant.

15. **Judge Norman Reid Neureiter (D. Colorado, Magistrate)** is an [adjunct professor](#) at the University of Colorado Law School ([2023 FDR](#)). Neureiter has been assigned to three cases in which the University of Colorado was a party and from which he did not recuse:

(1) [Brennecke v. Regents of the University of Colorado \(1:24-cv-00894\)](#). This case was dismissed in March 2025, and there are no recusals on the docket (filed 4/2/24, last filing 3/13/25). The Regents of the University of Colorado, a stand-in for the parent university, was named as a defendant.

(2) [Pinto v. University of Colorado \(1:22-cv-02181\)](#). This case was dismissed in 2024, and there are no recusals on the docket (filed 8/25/22, last filing 12/9/24). The Colorado Board of Regents, a stand-in for the parent university, was named as a defendant.

(3) [Johnson v. University of Colorado \(1:25-cv-00390\)](#). This case is still ongoing, and there are no recusals on the docket (filed 2/5/25, last filing 7/14/25). The University of Colorado (parent university) was named as a party.

16. **Judge Robert Pitman (W.D. Texas, appointed in 2014 by President Obama)** is an [adjunct professor](#) at the University of Texas at Austin School of Law (his [2023 FDR](#) includes teaching income from that year, though his professor page omits classes he taught then). Pitman has been assigned to 13 cases in which UT-Austin was a party and from which he did not recuse:

- (1) [Stewart v. University of Texas at Austin \(1:24-cv-00800\)](#). This case was terminated in 2024, and there are no recusals on the docket (filed 7/17/24, last filing 8/20/24). The University of Texas at Austin (parent university) was named as the defendant.
- (2) [Holmes v. University of Texas At Austin \(1:24-cv-01135\)](#). This case is still ongoing, and there are no recusals on the docket (filed 9/24/24, last filing 6/24/25). The University of Texas at Austin (parent university) was named as the defendant.
- (3) [LiVolsi v. University of Texas At Austin \(1:24-cv-00127\)](#). This case is still ongoing, and there are no recusals on the docket (filed 2/2/24, last filing 7/22/25). The University of Texas at Austin (parent university) was named as the defendant.
- (4) [Students for Fair Admissions, Inc. v. University of Texas at Austin \(1:20-cv-00763\)](#). This case was dismissed in 2024, and there are no recusals on the docket (filed 7/20/20, last filing 8/22/24). The University of Texas at Austin (parent university) was named as the defendant.
- (5) [Doe v. University of Texas at Austin \(1:20-cv-00468\)](#). This case was dismissed in 2021, and there are no recusals on the docket (filed 4/30/20, last filing 1/26/21). The University of Texas at Austin (parent university) was named as the defendant.
- (6) [Doe v. The University of Texas at Austin \(1:19-cv-00756\)](#). This case was dismissed in 2019, and there are no recusals on the docket (filed 7/28/19, last filing 9/17/19). The University of Texas at Austin (parent university) was named as the defendant.
- (7) [Valenzuela v. University of Texas At Austin and John Clarke \(1:19-cv-01202\)](#). This case was dismissed in 2023, and there are no recusals on the docket (filed 12/11/19, last filing 3/30/23). The University of Texas at Austin (parent university) was named as the defendant.
- (8) [Nikolova v. University of Texas At Austin \(1:19-cv-00877\)](#). This case was dismissed in 2022, and there are no recusals on the docket (filed 9/9/19, last filing 1/31/23). The University of Texas at Austin (parent university) was named as the defendant.
- (9) [Doe v. The University of Texas Austin \(1:19-cv-00451\)](#). This case was dismissed in 2019, and there are no recusals on the docket (filed 4/26/19, last filing 9/10/19). The University of Texas at Austin (parent university) was named as the defendant.
- (10) [Doe v. The University of Texas at Austin \(1:19-cv-00434\)](#). This case was dismissed in 2019, and there are no recusals on the docket (filed 2/9/19, last filing 6/17/19). The University of Texas at Austin (parent university) was named as the defendant.
- (11) [Doe v. University of Texas at Austin \(1:19-cv-00103\)](#). This case was dismissed in 2019, and there are no recusals on the docket (filed 2/9/19, last filing 6/17/19). The University of Texas at Austin (parent university) was named as the defendant.

(12) [Doe v. University of Texas At Austin \(1:18-cv-00085\)](#). This case was dismissed in 2018, and there are no recusals on the docket (filed 1/31/18, last filing 10/3/18). The University of Texas at Austin (parent university) was named as the defendant.

(13) [Qaddumi v. Interim UT Austin President James E. Davis \(1:24-cv-01002\)](#). This case is still ongoing, and there are no recusals on the docket (filed 8/27/24, last filing 7/25/25). The University of Texas at Austin (parent university) was named as the defendant.

17. **Judge Zahid Quraishi (D. New Jersey, appointed in 2021 by President Biden)** is an adjunct professor at Rutgers University Law School ([2023 FDR](#)). He has been assigned to two cases in which Rutgers was a party and from which he did not recuse:

(1) [Bagal v. Rutgers, The State University of New Jersey \(3:24-cv-11440\)](#). This case is still ongoing, and there are no recusals on the docket (filed 12/23/24, last filing 6/4/25). Rutgers University (parent university) was named as a defendant.

(2) [Doe v. Rutgers, The State University of New Jersey \(3:23-cv-22385\)](#). This case is still ongoing, and there are no recusals on the docket (filed 11/15/23, last filing 7/24/25). Rutgers University (parent university) was named as the defendant.

18. **Judge Mary Rowland (N.D. Illinois, appointed in 2019 by President Trump)** is a Northwestern University Pritzker School of Law ([2023 FDR](#)). Rowland has been assigned to two cases in which Northwestern was a party and from which she did not recuse:

(1) [Santiago v. Northwestern University \(1:24-cv-02058\)](#). The case is still ongoing, though some counts were partially dismissed on June 16, 2025 (filed 3/11/24, last filing 7/8/25). In [dkt. no. 15](#), Rowland raised the potential conflict of interest, but the parties [agreed](#) shortly after that she continue presiding over the case. Northwestern University (parent university) is the defendant in this case.

(2) [Neurodegenerative Disease Research, Inc. v. Northwestern University \(1:25-cv-02775\)](#). This case is still ongoing, and there are no recusals on the docket (filed 3/17/25, last filing 5/23/25). Northwestern University (parent university) is the defendant in this case.

19. **Judge Jolie Russo (D. Oregon, Magistrate)** is an [adjunct professor](#) at the University of Oregon School of Law ([2023 FDR](#)). Russo has been assigned to three cases in which the University of Oregon was a party and from which she did not recuse:

(1) [Schechtman v. University of Oregon \(6:17-cv-00046\)](#). A prior judge, who had no apparent ties to the University of Oregon, recused himself from the case, and the case was reassigned to Russo, who saw it through to its conclusion (filed 1/10/17, last filing 8/24/18). The University of Oregon School of Law was named as the defendant.

(2) [Stokes v. University of Oregon \(6:15-cv-02104\)](#). Plaintiffs voluntarily dismissed this case in 2018, and there are no recusals in the docket (filed 11/9/15, last filing 8/9/16). The University of Oregon (parent university) was named as the defendant.

(3) [Dynamic Measurement Group, Inc. v. University of Oregon \(6:14-cv-01295\)](#). This case was dismissed in 2018, and there are no recusals in the docket (filed 8/12/14, last filing 9/12/18). The University of Oregon (parent university) was named as the defendant.

20. **Judge Edmund Sargus (S.D. Ohio, appointed in 1996 by President Clinton)** is an [adjunct professor](#) at Ohio State University's Moritz College of Law ([2023 FDR](#)); where he teaches — it's 100% Ohio State — is redacted in at least two places on the report. Sargus has been assigned to five cases in which OSU was a party and from which he did not recuse:

(1) [Yoder v. Ohio State University \(2:23-cv-03967\)](#). This case is still ongoing (filed 11/30/23, last filing 7/28/25). According to [dkt no. 2](#), Sargus believed he did not have to recuse despite being an adjunct at OSU Law School, since the case involves the undergrad portion of the school. Sargus said he'd recuse if the parties asked him to do. Nobody asked, so he's still on the case. The Ohio State University (parent university) was named as a defendant.

(2) [Nag v. Ohio State University \(2:20-cv-03471\)](#). This case was dismissed in 2022, and there are no recusals on the docket (filed 7/10/20, last filing 3/16/22). The Ohio State University (parent university) was named as a defendant.

(3) [Doe v. The Ohio State University \(2:19-cv-01054\)](#). The case was dismissed in 2019, and there are no recusals on the docket (filed 3/21/19, last filing 5/20/19). The Ohio State University (parent university) was named as the defendant.

(4) [Faure v. The Ohio State University \(2:19-cv-01949\)](#). The case was dismissed in 2022, and there are no recusals on the docket (filed 5/3/19, last filing 3/22/22). The Ohio State University (parent university) was named as a defendant.

(5) [Doe v. The Ohio State University \(2:18-cv-01333\)](#). The case was dismissed in 2018, and there are no recusals on the docket (filed 10/30/18, last filing 10/31/18). The Ohio State University (parent university) was named as the defendant.

21. **Judge Michael A. Shipp (D. New Jersey, appointed in 2012 by President Obama)** is an [adjunct professor](#) at Seton Hall University School of Law ([2023 FDR](#)). Shipp has been assigned to one case in which Seton Hall was a party (he was a magistrate judge for five years before becoming a district judge) and from which he did not recuse:

(1) [Gonzalez v. Seton Hall University \(2:10-cv-01838\)](#). The case was dismissed in 2010, and there are no recusals in the docket (filed 4/9/10, last filing 8/16/10). Seton Hall University (parent university) was named as the defendant.

22. **Judge Patty Shwartz (Third Circuit, appointed by President Obama)** is an [adjunct professor](#) at Rutgers Law School ([2017 FDR](#)). Shwartz has been assigned to at least one case in which Rutgers was a party and from which she did not recuse:

(1) [Speeney v. Rutgers University \(15-3793\)](#). The case was dismissed in 2017, and there are no recusals in the docket (filed 11/20/15, last filing 1/11/17). Rutgers University (parent university) was named as a defendant.

23. **Judge Chelsey Vascura (S.D. Ohio, Magistrate)** is an [adjunct professor](#) at Ohio State University's Moritz College of Law ([2023 FDR](#); Ohio State is redacted twice for no apparent reason, considering that she has her own page on OSU Law's website). Vascura has been assigned to 12 cases in which OSU was a party and from which she did not recuse:

(1) [Hill v. The Ohio State University \(2:24-cv-04195\)](#). This case was terminated in January, and there are no recusals on the docket (filed 11/25/24, last filing 1/31/25). The Ohio State University (parent university) was named as the defendant.

(2) [Free State of Bavaria, represented by The University of Wurzburg v. The Ohio State University \(2:22-cv-02580\)](#). This case is still ongoing, and there are no recusals on the docket (filed 6/22/22, last filing 6/4/25). Ohio State University (parent university) was named as a defendant.

(3) [Jawad v. The Ohio State University Wexner Medical Center \(2:22-cv-03904\)](#). This case was dismissed in 2023, and there are no recusals on the docket (filed 11/4/22, last filing 8/3/23). The Ohio State University (parent university) was named as a defendant.

(4) [Kuntz v. The Ohio State University \(2:22-cv-01811\)](#). This case was dismissed in 2022, and there are no recusals on the docket (filed 3/28/22, last filing 9/13/22). The Ohio State University (parent university) was named as the defendant.

(5) [Chaudhry v. The Ohio State University \(2:20-cv-05070\)](#). This case was dismissed in 2021, and there are no recusals on the docket (filed 9/28/20, last filing 4/8/21). The Ohio State University (parent university) was named as the defendant.

(6) [Mitchell v. The Ohio State University \(2:19-cv-04162\)](#). This case was dismissed in June 2024, and there are no recusals on the docket (filed 9/19/19, last filing 6/18/24). The Ohio State University (parent university) was named as the defendant.

(7) [Kessling v. Ohio State University \(2:20-cv-01719\)](#). This case was dismissed in 2024, and there are no recusals on the docket (filed 4/3/20, last filing 2/13/24). The Ohio State University (parent university) was named as a defendant.

(8) [Faure v. The Ohio State University \(2:19-cv-01949\)](#). This case was settled in 2019, and there are no recusals on the docket (filed 5/13/19, last filing 3/23/22). The Ohio State University (parent university) was named as the defendant.

(9) [Doe v. The Ohio State University \(2:19-cv-01054\)](#). The case was dismissed in 2019, and there are no recusals on the docket (filed 3/21/19, last filing 5/22/19). The Ohio State University (parent university) was named as the defendant.

(10) [Huang v. Ohio State University \(2:19-cv-01976\)](#). This case is still ongoing, though with a jury verdict in May 2023 (filed 5/15/19, last filing 7/22/25). Huang filed a motion for Vascura to recuse herself due to a conflict, but



Vascura denied the motion ([dkt. no. 62](#)) and stayed on the case. The Ohio State University (parent university) was named as a defendant.

(11) [Tsipursky v. The Ohio State University \(2:18-cv-00753\)](#). The case was dismissed in 2019, and there are no recusals on the docket (filed 8/3/18, last filing 11/5/19). The Ohio State University (parent university) was named as the defendant.

(12) [Liu v. The Ohio State University \(2:25-cv-00525\)](#). The case was terminated this month, and there are no recusals on the docket (filed 5/12/25, last filing 7/18/25). The Ohio State University (parent university) was named as the defendant.

24. **Judge Michael Watson (S.D. Ohio, appointed in 2004 by President Bush Jr.)** is an [adjunct professor](#) at Ohio State University's Moritz College of Law ([2023 FDR](#)). Watson has been assigned a large number of cases involving OSU as a party. The following are the 11 OSU cases he's been assigned since Jan. 1, 2023, and from which he did not recuse. There are several dozen in total (e.g., 48 since 2015).

(1) [Hill v. The Ohio State University \(2:24-cv-04195\)](#). This case was dismissed in January 2025, and there are no recusals on the docket (filed 11/25/24, last filing 1/31/25). The Ohio State University (parent university) was named as a defendant.

(2) [Snyder-Hill v. The Ohio State University \(2:23-cv-02993\)](#). This case is still ongoing, and there are no recusals on the docket (filed 9/18/23, last filing 7/21/25). The Ohio State University (parent university) was named as the defendant.

(3) [Doe v. The Ohio State University \(2:23-cv-02996\)](#). This case is still ongoing, and there are no recusals on the docket (filed 9/18/23, last filing 7/18/25). The Ohio State University (parent university) was named as the defendant.

(4) [Knight v. The Ohio State University \(2:23-cv-02994\)](#). This case is still ongoing, and there are no recusals on the docket (filed 9/18/23, last filing 7/18/25). The Ohio State University (parent university) was named as the defendant.

(5) [Jane Doe v. The Ohio State University \(2:23-cv-03566\)](#). This case is still ongoing (filed 10/26/23, last filing 7/10/25). Judge Edmund Sargus, an OSU adjunct, recused ([dkt. no. 2](#)), but Judge Watson did not. The Ohio State University (parent university) was named as the defendant.

(6) [Gonzales v. The Ohio State University \(2:23-cv-03051\)](#). This case is still ongoing, and there are no recusals on the docket (filed 9/22/23, last filing 7/18/25). The Ohio State University (parent university) was named as the defendant.

(7) [Doe 162 v. The Ohio State University \(2:23-cv-02991\)](#). This case is still ongoing, and there are no recusals on the docket (filed 9/18/23, last filing 7/18/25). The Ohio State University (parent university) was named as the defendant.

(8) [Sullivan v. The Ohio State University \(2:23-cv-03174\)](#). This case was dismissed in January, and there are no recusals on the docket (filed 9/28/23, last filing 7/18/25). The Ohio State University (parent university) was named as the defendant.

(9) [Doe v. The Ohio State University \(2:23-cv-01048\)](#). This case was terminated in 2023, and here are no recusals on the docket (filed 3/23/23, last filing 10/10/23). The Ohio State University (parent university) was named as the defendant.

(10) [Dehen v. Ohio State University \(2:23-cv-00517\)](#). This case was dismissed in 2023 (filed 2/3/23, last filing 6/5/23). Judge Edmund Sargus recused ([dkt. no. 2](#)), but Judge Watson did not and said he didn't have to ([dkt. no. 12](#)). The Ohio State University (parent university) was named as the defendant.

(11) [St. John v. Ohio State University \(2:25-cv-00251\)](#). This case is still ongoing, and there are no recusals on the docket (filed 3/14/25, last filing 7/15/25). The Ohio State University (parent university) was named as the defendant.