

Jennifer J. Middleton, OSB 071510  
[jmiddleton@justicelawyers.com](mailto:jmiddleton@justicelawyers.com)  
Meredith Holley, OSB # 125647  
[mholley@justicelawyers.com](mailto:mholley@justicelawyers.com)  
JOHNSON, JOHNSON & SCHALLER, PC  
975 Oak Street, Suite 1050  
Eugene, OR 97401-3124  
Phone: 541/683-2506  
Fax: 541/484-0882  
Attorneys for Plaintiff Nadia Khalid Raza

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

NADIA KHALID RAZA,

Plaintiff,

vs.

LANE COMMUNITY COLLEGE,

Defendant.

Case No. 16-98

COMPLAINT

(Violation of Title IX,  
20 U.S.C. § 1681(a); Title VII,  
42 U.S.C. § 2000e; ORS 659A.030;  
Equal Protection,  
42 U.S.C. § 1983; Negligence)

*Demand for Jury Trial*

INTRODUCTORY STATEMENT

I.

This case challenges defendant Lane Community College's (LCC) failure to respond effectively to a student who repeatedly and threateningly harassed and stalked plaintiff Nadia Raza, a tenured instructor at the college. LCC's response violated legal guidelines for handling sexual harassment complaints on campus as well as its own policies. As a result of LCC's failures, the harassment worsened. When Nadia Raza took steps to protect herself on her own, LCC obstructed her ability to secure a restraining order. To this day, LCC has failed and refused

to take appropriate safety precautions and corrective action, effectively shutting Nadia Raza out of classroom teaching.

#### **JURISDICTION & VENUE**

2.

This matter arises under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2; Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a); the Equal Protection Clause of the 14<sup>th</sup> Amendment to the United States Constitution, enforceable through 42 U.S.C. § 1983; and related state laws. Jurisdiction is proper under 28 U.S.C. § 1331. Supplemental jurisdiction over related state law claims is proper under 28 U.S.C. § 1367.

3.

The events underlying plaintiff's claims took place in Lane County, Oregon, making venue proper in the District of Oregon, Eugene Division.

#### **PARTIES**

4.

Plaintiff Nadia Khalid Raza is a resident of the State of Oregon and a tenured instructor at LCC. She is a woman of Pakistani origin and a Muslim.

5.

Defendant Lane Community College is a public community college within the meaning of ORS 341.005, operating within the Lane County community college district.

6.

LCC receives federal funding and is subject to Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a) ("Title IX"). Title IX prohibits sex discrimination in education, including sexual harassment, and protects employees as well as students.

### FACTUAL ALLEGATIONS

7.

In January 2014, LCC student S.S.<sup>1</sup> enrolled in Nadia Raza's Race and Ethnicity class.

8.

S.S. approached Nadia Raza in her office after the first day of class. He told her that he was a Marine and had been stationed in Afghanistan, and he asked where she was from. Two days later, S.S. turned in an assignment in which he wrote that he was affiliated with neo-Nazis and had a background in competitive mixed martial arts.

9.

Nadia Raza found S.S.'s approaches disturbing and threatening. He appeared to take particular interest in her as a Pakistani-Muslim woman.

10.

The following week, S.S. began emailing Nadia Raza asking her to meet him off campus. Nadia Raza said no. She told him that she strictly maintains professional boundaries and that she was not a potential friend or romantic partner. S.S. persisted nevertheless, sending increasingly aggressive personal emails.

11.

On February 5, 2014, Nadia Raza reported S.S.'s harassment to her Department Chair, Philip Martinez. On February 11, 2014, Nadia Raza reported S.S.'s harassment to LCC's Public Safety Department.

12.

When S.S. arrived at class later that day, LCC Public Safety officers cited him with harassment under the student code of conduct.

---

<sup>1</sup> S.S. is a pseudonym. Defendant is aware of the student's identity.

13.

Nadia Raza asked to participate in S.S.'s student conduct process to help him understand how his behavior affected her and to make it clear to him that she wanted him to stop.

14.

The Department of Education's Office of Civil Rights, which enforces Title IX's ban on sex discrimination in education, requires that sexual harassment complainants be advised of applicable timelines for investigation and resolution of their complaints, to present evidence, and to be notified in writing of the outcome. If the school conducts a hearing, the complainant has a right to have the same access to information that may be used at the hearing as the accused and to be present on the same terms as the accused. LCC's sexual harassment complaint resolution process also allowed for involvement by the complainant.

15.

LCC officials told Nadia Raza that she could not participate in S.S.'s student conduct process or his hearing and that she was only entitled to information on a "need to know" basis. They told Nadia Raza that Associate Dean of Student Affairs Barbara Delansky was the "judicial officer" and that the hearing would be conducted in private. They did not interview Nadia Raza as part of their investigation and did not tell her when the hearing would occur.

16.

On February 25, 2015, Dean Delansky met with Nadia Raza. Delansky said that she had met with S.S. in a conduct hearing, that he was told to stop harassing her, and that the college would reimburse him if he dropped her class. Delansky said that she thought S.S. was a "good kid" and that he understood that he had gone too far. She commented that "rejection is hard."

17.

LCC did not send S.S. an outcome letter until several days after his hearing. The letter read, "As a result of our conversation, I am confident you understand the seriousness of the citation and there will not be any repeat violation of this type." It had no express prohibition against contact with Nadia Raza.

18.

Nadia Raza asked LCC repeatedly over the following several months for a copy of the outcome letter or something in writing stating the outcome of the hearing. LCC refused to give it to her. College officials claimed that they were prohibited from giving her that information by FERPA, the student privacy law.

19.

In fact, guidance from the Department of Education, which enforces both Title IX and FERPA, provides that complainants are entitled to receive a copy of the outcome letter at the same time that the perpetrator receives it, and that this requirement of Title IX overrides any conflicting FERPA provisions.

20.

In March, 2014, Nadia Raza spoke with Executive Dean for Student Affairs Kerry Levett about her frustrations with LCC's response to harassing students. She said that she felt shut out of the process and barred from knowing the exact outcome, especially the specific restrictions on S.S. (if any). Dean Levett told Nadia Raza that LCC did not have Title IX-compliant policies so the issue was coming at a bad time.

21.

S.S. emailed Nadia Raza on March 6, 2014. He said he was confused about whether she had wanted him to be cited for harassment, since she had not been a part of the student conduct hearing. He said he thought the whole citation and conduct process might have been a misunderstanding. He emailed again on March 24, 2014. He said he had been told during his hearing that he did not have to drop Nadia Raza's class, and he asked whether he could sign up for one of her spring term classes.

22.

LCC had refused to give Nadia Raza anything that reflected whether S.S. had received a no-contact order, and, in fact, he had not. She did not know whether she was required to allow

him to take her class, despite his harassing behavior. Fearful that he would continue to harass her if she responded or allowed him in her class, she did not respond to the emails.

23.

On April 2, 2014, LCC instructor Caroline Lundquist received an email from S.S. He wrote that he had “discovered that I have a large corporation keeping me under surveillance – through my computer, cameras (everywhere in my home) and hired agents or paid off people. I am letting you know about this because they have a large presence here at Lane, and tend to enroll en masse in my classes.” He cautioned Lundquist that she might be under surveillance.

24.

Instructor Lundquist reported this email to Department Chair Martinez, who reported it to LCC and asked for “rapid intervention.”

25.

Lundquist made another report later in the day after S.S. attended her class. She reported that S.S. told her that a corporation is monitoring him and wants to kill him, that several students and professors are aligned with the corporation, and that he will do anything to protect those around him. He said that he thought students in the class were reading his thoughts and trying to keep him from murdering anyone. Lundquist called S.S. a safety concern and an imminent risk.

26.

LCC Public Safety looked into S.S.’s background and informed Dean Levett on April 3, 2014, that he was a convicted felon and had several current restraining orders.

27.

Later that day (April 3, 2014), S.S. walked into a class Nadia Raza was teaching and sat in the front row, immediately in front of her. At that time LCC knew of S.S.’s statements to Lundquist, but Nadia Raza did not. Surprised to see him there and fearful, Nadia Raza asked other students to walk with her to her office after class. S.S. followed and waited outside of her office. She locked the door, waited until he left, and exited out a different corridor.

28.

On Friday, April 4, 2014, LCC Public Safety officers notified S.S. that he was temporarily trespassed from campus until he attended a meeting with Dean Levett on April 8, 2014 at 1:00 p.m. Dean Levett followed up April 5, 2014 by email to S.S. and again on Monday, April 7, 2014. S.S. did not understand why he was being asked to this meeting and Dean Levett told him it was a “safety consultation” for him.

29.

No campus-wide notification was issued about S.S., and no one told Nadia Raza that he was trespassed from campus.

30.

Nadia Raza emailed Dean Levett on April 7, 2014 and again asked if she could have a copy of the outcome letter against S.S. or any other documentation of the outcome of her charge. Even though Dean Levett was aware of S.S.’s emails and statements to Lundquist, was aware that he was a convicted felon with multiple retraining orders, and was aware that he had been trespassed from campus until a meeting she had scheduled with him the next day, she shared none of this with Nadia Raza. She did not inquire if S.S. had contacted Nadia Raza or if Nadia Raza had seen him on campus. Nor did she answer Nadia Raza’s question. Instead, Dean Levett told Nadia Raza that she was out of the office and that she could not recall whether her case was resolved yet or not. She wished Nadia Raza a good start to the new term.

31.

Nadia Raza received two emails from S.S. that day saying that he believed the February harassment charge was part of a conspiracy headed by the Sony Corporation.

32.

On April 8, S.S. called Nadia Raza and told her that he had documentation that she was physically attracted to him. He said that he had never received a directive not to contact her and that he was planning to take action against the “corruption” at LCC. He said that she would not

hear from him again unless she reported that he had contacted her. Nadia Raza responded that that sounded like a threat, and he said, “yes.”

33.

Terrified, Nadia Raza went to speak to Department Chair Phil Martinez. Chair Martinez disclosed that another female instructor at LCC had also received disturbing communications from S.S. Together they called Dean Levett. Dean Levett continued to say that she could give no information about S.S. and that any other safety concerns about him were “totally unrelated” to Nadia Raza’s situation. She said that she needed to talk to the college’s attorney to find out what support LCC could provide Nadia Raza.

34.

Dean Levett told Nadia Raza for the first time April 8, 2014, that she should report any contact she had from S.S. and that he was not permitted to be on campus until he met with Dean Levett. Nadia Raza had already told Dean Levett about the multiple contacts and about S.S.’s threat if she reported him. She said she feared retaliation from S.S. after his threat and she did not want to be a part of the formal citation process again. Dean Levett told Nadia Raza LCC was limited in what it could do without a formal citation from her.

35.

LCC took no steps to promote Nadia Raza’s safety such as moving her office, moving her classroom, posting a security officer in her class, ensuring regular escorts around campus, providing her with a mobile safety alarm, or monitoring her incoming email. On information and belief, LCC took no steps to mobilize its threat assessment team and made no effort to connect S.S. with mental health care, assess or address the underlying causes of his behavior, or investigate and assess where S.S. fell on the path to intended violence.

36.

LCC gave Nadia Raza a pre-printed “personalized safety plan” that was designed for domestic violence victims. The pamphlet contained advice like keeping loose change with her at all times in case she had to make an emergency phone call.



37.

The next day, April 9, 2014, Nadia Raza reiterated to Dean Levett that S.S. was emailing her on three different email accounts including a personal account, that she had reported these contacts to Chair Martinez, and that it was getting worse. She said, “I am the target of harassment, intimidation, and I am being terrorized by a volatile and potentially dangerous student. This situation is heightened by the lack of communication from the college.” She asked again for specific information about the outcome of her complaint. She asked to know when S.S. was scheduled to be on campus.

38.

Dean Levett did not respond.

39.

Also on April 9, 2014, S.S. contacted a third female LCC instructor who lives near Nadia Raza. He referenced the “corrupt administration” at LCC and asked if the instructor could help him contact Nadia Raza. He sent another message to her April 10, 2014. The instructor reported these messages to LCC and to Nadia Raza.

40.

Nadia Raza spoke with Caroline Lundquist and learned about the disturbing comments S.S. had made after Lundquist’s class, including that he believed a corporation was trying to kill him and that his classmates were reading his thoughts and trying to keep him from murdering anyone.

41.

On April 10, 2014, Nadia Raza told Chair Martinez that S.S. was looking for her through a neighbor and it was not safe for her to be on campus where S.S. could easily find her. She requested to take leave for the rest of the term. She made clear that she wanted LCC to take action but did not want her name to be associated with it. She said that LCC had failed to take reasonable or effective steps to end S.S.’s harassment and she was going to seek a restraining order.

42.

On April 12, 2014, a fourth female LCC instructor reported receiving a disturbing and delusional email from S.S.

43.

On April 14, 2014, a fifth female LCC instructor reported receiving a disturbing and delusional email from S.S.

44.

On information and belief, LCC took no corrective action in response to these reports.

45.

Nadia Raza wrote Dean Levett on April 14, 2014, again asking for a response to her requests for information and informing Dean Levett that in order to secure a restraining order, she needed documentation from the student conduct hearing.

46.

Dean Levett did not write back until April 19, 2014. She refused to provide the documentation and went even further to obstruct Nadia Raza's efforts to protect herself. She told Nadia Raza that it would be illegal for her to use any emails that S.S. sent to other instructors in seeking a restraining order and instructed her to destroy and delete all copies of them. She cautioned Nadia Raza to seek legal advice about whether she could even use her own emails from S.S. to support a restraining order.

47.

Dean Levett told Nadia Raza that S.S. was trespassed from campus until an unspecified time when he was to meet with her. On information and belief, LCC took no steps to publicize this trespass order around campus or to circulate photos of S.S. so people would know to report if he showed up.

48.

Nadia Raza applied for a Stalking Protective Order against S.S. on April 22, 2014. She had no documentation from LCC and no address for S.S., however, so she had no way to serve

him. She again asked for an address from LCC but they refused to provide any information. LCC told her that they could not confirm whether S.S. had even received his outcome letter or whether he had received any other recent communications from LCC.

49.

Meanwhile, Nadia Raza was on forced leave from campus teaching and S.S. continued to contact her almost daily. He also continued to contact other female instructors. He said that he was still enrolled in classes at LCC. Nadia Raza reported these contacts to LCC.

50.

LCC made no effort to bring Nadia Raza back into the classroom.

51.

On May 5, 2014, S.S. was arrested at an apartment building in Eugene where he said he was looking for Nadia Raza. It was the second time he had been there. The first time, he tried to walk right into an apartment and the resident told him that Nadia Raza did not live there. S.S. came back late at night a few days later and the resident found him so threatening that he drew a concealed handgun and called the police. S.S. was cited for Criminal Trespass II and released.

52.

On May 27, 2014, S.S. contacted the *Eugene Weekly* and asked to post an "I Saw You" notice directed to Nadia Raza. He stated that he was "Now studying corporate and academic corruption at public library 2nd floor, by windows or at computers." The public library is across the street from the LCC downtown branch where Nadia Raza sometimes worked when she was still on campus.

53.

Nadia Raza applied for a sabbatical for the following year but LCC denied a full one-year sabbatical.

54.

The Lane County Sheriff's Office was finally able to serve S.S. in June and the Stalking Order became permanent on June 16, 2014. The next day, S.S. emailed the *Eugene Weekly*,

writing that Sony and the FBI were part of a conspiracy to block him from “normal interactions with women I encounter, in order to push me toward having sex with cartel representatives . . . .” He suggested that the *Weekly* should “unravel historical cartel records within South Park (and Team America).”

55.

It was not until the spring of 2015, more than a year after the harassment started, that LCC met with Nadia Raza to discuss a possible return to classroom teaching. Nadia Raza requested a consistent and reliable escort and a safety officer dedicated to her classes, among other precautions. LCC said that it could not schedule regular escorts for her and could not detail an officer to her classes. She could have to wait hours for an escort if safety officers were responding to something else. LCC also was not willing to circulate a photo of S.S. campus-wide to enable enforcement of the trespass order. One of their suggestions to Nadia Raza was to download a safety-related app recommended by Dr. Phil for her phone.

56.

S.S. has continued to appear in Nadia Raza’s neighborhood. On one occasion he confronted her at the Lane County Farmer’s Market. Nadia Raza moved out of her house for fear that he knew where she lived.

57.

LCC has failed and refused to take reasonable steps to make Nadia Raza’s work environment secure and free from the threat of continued sexual harassment or violence. It continues to maintain working conditions on campus that it knows are not safe or free from the threat of continued sexual harassment against Nadia Raza, and a reasonable person in Nadia Raza’s position would not teach on campus without adequate protections.

58.

Nadia Raza has continued to teach only on-line classes on a reduced schedule. She has lost valuable income and classroom teaching experience. LCC has denied her a full-time

teaching schedule of online classes and reduced her online class enrollment so as to reduce the hours for which she can be paid.

59.

Nadia Raza filed a verified complaint with the Oregon Bureau of Labor & Industries on February 17, 2015. She received a 90-day notice of right to sue on November 5, 2015.

**FIRST CLAIM FOR RELIEF  
Title IX, 20 U.S.C. § 1681(a)**

Plaintiff Nadia Raza repeats and realleges paragraphs 1 – 59 as if fully set forth herein.

60.

By the acts and omissions described above, defendant LCC discriminated against Nadia Raza on the basis of sex in violation of Title IX when it failed to take effective remedial action to stop known sexual harassment, refused and denied information and involvement that she had a right to have and that was necessary to Nadia Raza's efforts to protect herself, failed and refused to implement available and reasonable safety measures to allow her to participate on campus, constructively discharged her from classroom teaching and reduced her hours to a part-time teaching load, all in violation of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a).

61.

LCC's acts and omissions were clearly unreasonable in light of known circumstances.

62.

Defendant LCC has further retaliated against Nadia Raza for opposing sex discrimination in violation of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a).

63.

As a result of defendant's unlawful acts, Nadia Raza has lost income and benefits, has incurred consequential damages including but not limited to moving expenses, and continues to suffer a long-term reduction in earning capacity. These damages are continuing to accrue.

64.

As a further result of defendant's unlawful acts, Nadia Raza has suffered emotional distress including extreme fear, anxiety, nightmares, depression, and loss of enjoyment of life. Her entire way of life has been disrupted by the constant sense of danger. These damages are continuing and Nadia Raza is entitled to compensation in an amount to be determined by the jury at the time of trial.

65.

Nadia Raza is entitled to reasonable costs and attorney fees incurred in pursuing this action.

**SECOND CLAIM FOR RELIEF**  
**Title VII, 42 U.S.C. § 2000e**

Plaintiff Nadia Raza repeats and realleges paragraphs 1 – 59 as if fully set forth herein.

66.

By the acts and omissions described above, defendant LCC discriminated against Nadia Raza in her terms and conditions of employment by failing to take effective remedial action to stop known harassment on the basis of sex, race, national origin and/or religion, failing and refusing to implement available and reasonable safety measures to allow her to work, constructively discharging her from classroom teaching and reducing her hours to a part-time teaching load, all in violation of Title VII, 42 U.S.C. § 2000e-2.

67.

Defendant LCC has further retaliated against Nadia Raza for opposing these unlawful acts, in violation of 42 U.S.C. § 2000e-3.

68.

As a result of defendant's unlawful acts, Nadia Raza has lost income and benefits, has incurred consequential damages including but not limited to moving expenses, and continues to suffer a long-term reduction in earning capacity. These damages are continuing to accrue.

69.

As a further result of defendant's unlawful acts, Nadia Raza has suffered emotional distress including extreme fear, anxiety, nightmares, depression, and loss of enjoyment of life. Her entire way of life has been disrupted by the constant sense of danger. These damages are continuing and Nadia Raza is entitled to compensation in an amount to be determined by the jury at the time of trial.

70.

Nadia Raza is entitled to reasonable costs and attorney fees incurred in pursuing this action.

**THIRD CLAIM FOR RELIEF  
ORS 659A.030**

Plaintiff Nadia Raza repeats and realleges paragraphs 1 – 59 as if fully set forth herein.

71.

By the acts and omissions described above, defendant LCC discriminated against Nadia Raza in her terms, conditions, and privileges of employment by failing to take effective remedial action to stop known harassment because of sex, race, national origin and/or religion, failing and refusing to implement available and reasonable safety measures to allow her to work, constructively discharging her from classroom teaching and reducing her hours to a part-time teaching load, all in violation of ORS 659A.030.

72.

Defendant LCC has further retaliated against Nadia Raza for opposing these unlawful acts, in violation of ORS 659A.030.

73.

As a result of defendant's unlawful acts, Nadia Raza has lost income and benefits, has incurred consequential damages including but not limited to moving expenses, and continues to suffer a long-term reduction in earning capacity. These damages are continuing to accrue.

74.

As a further result of defendant's unlawful acts, Nadia Raza has suffered emotional distress including extreme fear, anxiety, nightmares, depression, and loss of enjoyment of life. Her entire way of life has been disrupted by the constant sense of danger. These damages are continuing and Nadia Raza is entitled to compensation in an amount to be determined by the jury at the time of trial.

75.

Nadia Raza is entitled to reasonable costs and attorney fees incurred in pursuing this action.

**FOURTH CLAIM FOR RELIEF**  
**Equal Protection**  
**United States Constitution, Amendment 14**  
**42 U.S.C. § 1983**

Plaintiff Nadia Raza repeats and realleges paragraphs 1 - 59 as if fully set forth herein.

76.

The actions of defendant LCC were taken under color of state law and pursuant to a policy, custom or practice.

77.

By the actions and omissions described above, defendant LCC subjected plaintiff to severe sexual harassment and a hostile work environment on the basis of sex, race, national origin and/or religion.

78.

Defendant's actions and omissions deprived plaintiff of rights guaranteed by the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution.



79.

As a result of defendant's unlawful acts, Nadia Raza has lost income and benefits, has incurred consequential damages including but not limited to moving expenses, and continues to suffer a long-term reduction in earning capacity. These damages are continuing to accrue.

80.

As a further result of defendant's unlawful acts, Nadia Raza has suffered emotional distress including extreme fear, anxiety, nightmares, depression, and loss of enjoyment of life. Her entire way of life has been disrupted by the constant sense of danger. These damages are continuing and Nadia Raza is entitled to compensation in an amount to be determined by the jury at the time of trial.

81.

Nadia Raza is entitled to reasonable costs and attorney fees incurred in pursuing this action.

**FIFTH CLAIM FOR RELIEF**  
**Negligence**

Plaintiff Nadia Raza repeats and realleges paragraphs 1 – 59 as if fully set forth herein.

82.

Defendant LCC had a duty to protect plaintiff from sex discrimination, including but not limited to sexual harassment by a student, and to maintain a safe working environment.

83.

LCC was on notice that S.S. was harassing Nadia Raza as well as other female instructors and that his harassment persisted and worsened despite LCC's suggestion that he stop.

84.

LCC was negligent in failing to take reasonable corrective action designed to stop the harassment as well as failing to take reasonable security measures to ensure that Nadia Raza could work in a secure and harassment-free environment.

85.

It was reasonably foreseeable that failure to take reasonable corrective actions would escalate or allow to continue the harassing and intimidating behavior that Nadia Raza experienced.

86.

LCC's negligence interfered with Nadia Raza's legally-protected interest in a secure and harassment-free working environment.

87.

LCC's negligence was a substantial factor in causing Nadia Raza's significant damages.

**WHEREFORE**, plaintiff Nadia K. Raza prays for judgment against defendant as follows:


1. An Order enjoining LCC, its agents, employees, and those acting in concert therewith, from unlawful discrimination on the basis of sex, race, national origin or religion including the failure to address, prevent, and/or remedy sexual harassment, and from unlawful retaliation against Nadia Raza for opposing LCC's unlawful discrimination;
2. Injunctive relief requiring LCC: (a) to provide a safe work environment for Nadia Raza to return to classroom teaching; (b) to institute and enforce, with the assistance of outside experts, a comprehensive sexual harassment policy, including procedures for effective reporting of sexual harassment incidents, an effective and immediate crisis response, and an expanded victim assistance and protection program; (c) to adopt effective student conduct procedures that allow for participation by the complainant, appropriate sharing of information regarding outcomes, and clear communication and enforcement of sanctions for violation of sexual harassment policies; and (d) to provide for an annual, independent review by the Office of the President, with the participation of outside reviewers including faculty, of the Students of

Concern process, including compliance with Title IX, compliance with best practices regarding campus safety and response to students in distress, and availability of trained and competent mental health specialists for the campus community.

3. Economic damages in the form of lost wages and benefits in an amount to be determined at trial, and prejudgment interest thereon;
4. Compensatory damages in an amount to be determined at trial;
5. Her reasonable attorney fees and costs incurred herein; and
6. Such other relief as the Court may deem just and equitable.

Respectfully submitted this 21<sup>st</sup> day of January, 2016.

**JOHNSON, JOHNSON & SCHALLER, PC**

By: 

Jennifer J. Middleton, OSB 071510  
[jmiddleton@justicelawyers.com](mailto:jmiddleton@justicelawyers.com)  
Meredith Holley, OSB # 125647  
[mholley@justicelawyers.com](mailto:mholley@justicelawyers.com)  
JOHNSON, JOHNSON & SCHALLER, P.C.  
975 Oak Street, Suite 1050  
Eugene, OR 97401-3124  
Telephone: 541/683-2506  
Fax: 541/484-0882  
Attorneys for Plaintiff Nadia Khalid Raza