



Allen Harris Law

PENNSYLVANIA OFFICE

Samantha K. Harris, Esq.
Allen Harris PLLC

PO Box 673
Narberth, PA 19072
(610) 634-8258
sharris@allenharrislaw.com

CONNECTICUT OFFICE

Michael Thad Allen, JD, PhD
Allen Harris PLLC

PO Box 404
Quaker Hill, CT 06375
(610) 634-8258
mallen@allenharrislaw.com

April 17, 2023

Roberto Zárate
Chair
Board of Trustees
Alamo Colleges District
2222 N. Alamo St.
San Antonio, TX 78215
rzarate11@alamo.edu

Karen B. Ireland, J.D.
Director of Talent Advocacy and
Solutions
Talent, Organization, and Strategic
Innovation
Alamo Colleges District
2222 N Alamo St
San Antonio, TX 78215
Kireland3@alamo.edu

Michael Flores
Chancellor
Alamo Colleges District
2222 N. Alamo St.
San Antonio, TX 78215
dst-chancellor@alamo.edu
rflores@alamo.edu

Dr. George Railey, Jr.
Vice Chancellor for Academic Success
Alamo Colleges District
2222 N. Alamo St.
San Antonio, TX 78215
grailey@alamo.edu

RE: Termination/Non-Renewal of Will Moravits in Retaliation for the Exercise of Protected Speech in the Classroom

Dear Chair Zárate, Chancellor Flores, Vice Chancellor Railey, and Director Ireland,

I am writing on behalf of my client, Will Moravits, whom the Alamo College's District ("Alamo") recently informed by "Notice of Nonrenewal" (dated March 27, 2023) that he would be fired. The nonrenewal should be taken back, and the Alamo Colleges District should reinstate my client to his rightful employment.

His "non-renewal" is more properly characterized as a termination. Dr. Moravits, as you know, was scheduled to teach through the Spring 2024 semester. Thus, the so-called

“nonrenewal” is much more than simply a discretionary choice not to re-assign an at-will employee to service certain classes. It takes away employment already offered to him.

This “nonrenewal” came directly on the heels of Alamo’s placing Dr. Moravits on “administrative leave” (with reduced pay due to not being allowed to teach his Flex II course) on February 9, 2023. This was based on accusations that he had harassed a student in class. Any reasonable investigation, which Dr. Moravits has already been informed will not be carried to its conclusion and without Dr. Moravits being allowed to provide witnesses on his behalf, would reveal that the accusations were made in bad faith by a student who could not tolerate exposure to facts and viewpoints with which she did not agree. Given that Dr. Moravits’ disputed statements were made in the context of his classroom teaching, completely within the subject matter of his classes, and often in response to direct inquiries by students, this is an egregious violation of Dr. Moravits’ academic freedom as well as a violation of his constitutional rights to free expression under the First Amendment of the United States Constitution and its equivalent under the Texas State Constitution.

I am therefore writing in the hopes that this matter can be resolved without the necessity of resorting to legal process.

Please let me review the facts at issue, which are more than sufficient to make out a Constitutional violation under 42 USC § 1983.

I. BACKGROUND

Dr. Moravits has received consistently excellent teaching evaluations, as demonstrated by his 2022 faculty peer review. This stated that “Dr. Moravits is an excellent instructor and teaches at a level that is appropriate and acceptable for students.” A February 2022 classroom observation for GOVT 2305-080 again gave Dr. Moravits marks for “exceeds expectations” across the board and concluded, “He does a great job at addressing what might be considered a difficult topic.” Likewise, a November 2022 classroom observation by Cindy Dinsmore, which Interim Department Chair Joelle Nanivazo signed on December 1, 2022, found that Dr. Moravits “exceed[s]” expectations in all categories and “Dr. Moravits is an excellent instructor.” Whatever pretextual grounds there are for Alamo to terminate Dr. Moravits, deficiencies in teaching are clearly not among them. Dr. Moravits is a nationally recognized expert on police brutality and the influence of race and politics on the practice of policing, which he established through his book, *The Blue Divide: Policing and Race in America* (Houndstooth Press, 2022). He has also published research in the peer reviewed journal, *Studies in Conflict and Terrorism*. Indeed, this is an unusual and exemplary accomplishment in scholarship for a community college teacher. It is therefore scarcely plausible that Alamo faults Dr. Moravits either for his scholarly productivity or for his depth of knowledge in the areas in which he teaches.

Obviously, Dr. Moravits’ termination (which is what it should more properly be called) was a direct consequence of the Process B complaint submitted by an anonymous student on January 19, 2023. (Alamo refuses to allow Dr. Moravits to know the identity of his accuser or the evidence against him, although it became clear who the complainant is in the course of the investigation).

On the strength of unsubstantiated allegations, St. Philip's College immediately placed Dr. Moravits on administrative leave, ostensibly with pay (February 9, 2023). This not only imposed the adverse employment consequences of depriving Dr. Moravits of Flex II pay, but it also violated established Alamo policies and had absolutely no justification, least of all any justification in protecting the campus, students, faculty, or staff from some sort of threat. Nevertheless, Dr. Moravits was publicly escorted from campus by a police officer, for what appears to be no other reason than to humiliate him. At no point has Alamo found, and there is certainly no ground to find, that Dr. Moravits represents any conceivable threat to any individual or to St. Philip's as an institution.

In short, the Alamo Colleges District's reaction to allegations that something Dr. Moravits said in class offended the sensibilities of a single student has been nothing short of hysterical.

Shortly thereafter, Alamo not only declined to renew Dr. Moravits' current non-tenure appointment in the Spring 2023 semester; in addition, his future employment at St. Philip's College was also rescinded. His future employment had been confirmed through the Spring 2024 Semester by messages to Dr. Moravits and scheduling in ACES. As noted above, he also forfeited Flex II overload pay—all without even an investigation of the allegation against him. He was simply pre-judged guilty, prevented from earning Flex II pay, and terminated. In addition, he was disallowed from even contacting anyone on campus, thus preventing him from talking to witnesses and defending himself from the student's bogus charges, in addition to violating Alamo's policy of free association.

A. The Student's Frivolous Complaint

The student's frivolous complaint and Alamo's punitive actions in response to it clearly targeted Dr. Moravits' protected speech as a teacher in the classroom. The student complaint arose in POSI 2304, Introduction to Political Science. In that class, Dr. Moravits did nothing more than ask students to engage all sides of controversial issues, such as police brutality and gender ideology. Many of his engagements with students in class discussion came in direct response to their questions.

Alamo characterizes the anonymous complainant as a "victim" of alleged misconduct involving the ordinary course of teaching in POSI 2304. Far from being a "victim," however, the student made allegations that amount to descriptions, in the student's own words, that she had merely heard things that she disagreed with and which, in consequence, offended her subjective feelings and sensibilities.

The first incident was on January 19, 2023. The larger context was a discussion of differences between liberals and conservatives in American life and political culture. Dr. Moravits began class by lecturing on the comparative response of red and blue states to the COVID pandemic. He brought up an empirical study that showed a correlation between conservative political viewpoints and a greater tolerance for risk. Likewise, there is a correlation between liberal political viewpoints and risk-aversion. These facts are clearly relevant to the subject matter of the course.

Dr. Moravits discussed how these statistical disparities might explain the (also empirically established) disproportionate number of conservatives who work in

inherently dangerous occupations such as police, firefighters, military, oil-well workers and so forth. In response to one student, who asserted that liberals were more “shy,” Dr. Moravits raised the question of whether this conclusion followed from the evidence. The class went on to discuss the gay-rights movement, which has been both very liberal and very expressive— thus hardly “shy.” Dr. Moravits gave the example of gay-pride parades in San Francisco, which he had personally researched in his preparations for teaching, in the form of widely circulated footage. Indeed, this footage is widely available on both right-leaning and left-leaning media, sometimes celebrated, and sometimes condemned. Dr. Moravits pointed out that some parades have included the performance of sexual acts in public, examples of which can readily be found on internet sites, again, some of them celebratory. Another student responded that there are now “drag kids” that participate in such events. Further class discussion ensued concerning this observation because, among other things, it is true and relevant to the class. Dr. Moravits shared that he had personally seen footage of “drag kids” in gay-pride videos, as young as 12 years old, “twerking” on grown men—again, something directly related to the subject matter of the class in which a student had asserted that liberal communities were “shy.”

Another student raised a direct question about the contemporary public interest in “trans issues.” He was specifically interested in the changing nature of language due to the trans movement, so Dr. Moravits led the class in a discussion of the rapid rise of the trans movement in mainstream American life. Dr. Moravits explained the growing pushback against this movement from within the LGBT community and from some feminists, who have come to be known as TERFs (trans exclusionary radical feminists). Perhaps the most famous example is J.K. Rowling, author of the Harry Potter books. The class discussed how some gay men and lesbians are also now expressing concern that the trans movement discriminates against them. Some argue that emphasis on transitioning pre-adolescent children is leading to the sterilization and genital mutilation of children who would otherwise grow up to be normal, adult gay men and women. The class also discussed the growing number of men and women who “transitioned” as teens but who have now “detransitioned” and have come out against “gender affirming care.” Such controversies cannot be wished away from the public sphere or censored in the classroom by Alamo.

Dr. Moravits pointed out the existence of certain activist organizations, such as FIST, WOLF, and a Twitter page with close to a quarter of a million followers, “Gays against Groomers,” as examples of these diverse viewpoints and controversies. The class then transitioned to discuss the growing emphasis on ever-more niche gender identities, which has even manifested in a small group that is trying to get “Minor Attracted People” (MAPs, a euphemism for pedophiles) identified as a sexual orientation. Dr. Moravits noted that there have long been accusations among child stars in Hollywood of rampant pedophilia, but at no point did he say that “P” in LGBTQ+ stood for “pedophilia.” That would be absurd, because any reference to “P” in the expanding definitions of gender identity, so far as Dr. Moravits is aware, normally refer to “pansexual.” At this point, Dr. Moravits specifically stated to the class, as is his practice on controversial matters, that he was not making a moral judgement one way or the other. Dr. Moravits considers it good pedagogy, which is reflected in his student and teaching evaluations, for an instructor not to take sides on controversial issues but to present students with the full range of political

ideas in American life so that they can make their own critical inquiry. Unfortunately, Alamo has now decided to terminate him illegally for this practice.

The student complainant spoke up in class and complained that Dr. Moravits was somehow “harming” the “community,” although what this student conceives of as “community” has never been made clear. By “harm,” she apparently meant hearing things with which she not only disagrees but also does not want others to hear or be allowed to discuss. It is true that Dr. Moravits rebuffed this proposition; to do otherwise would “harm” other students and prevent them from learning. Dr. Moravits stated that he was merely shedding light on an opposing point of view and told the student about sources and personalities that she could google to learn and inquire for herself. For example, it is simply a fact that there are transgender individuals disagree on these issues.

Yet the student has now accused Dr. Moravits of making statements such as:

- The LGBTQIA+ community is riddled with pedophilia
- The "p" in the LGBTQIA+ community stands for pedophilia
- Gay pride activists organize parades “with 12-year-olds jerking off in them”

It is important to note that, far from having her educational experience “harmed” or even interrupted, the complainant continued to come to class each day. This alone demonstrates the bad-faith nature of her complaint. One of the more liberal students in the class volunteered to Dr. Moravits a few days later that he believed the complainant had missed the point of the class discussion and overreacted. Yet Dr. Moravits is prevented from contacting such exculpatory witnesses by Alamo’s draconian order muzzling him and preventing him from conferring with anyone associated with the campus.

Another allegation in the student complaint is that Dr. Moravits justified “police brutality,” specifically about the murder of George Floyd. Bizarrely, she claimed that Dr. Moravits deviated from the course materials to “controversial topics irrelevant to the class,” as if George Floyd and police brutality do not fit in a class on the exercise of government power. On closer examination, her main grievance appears to have been that Dr. Moravits purportedly “instigated discussion between students, especially those who agree with him.” Nothing could make it plainer that the student’s real complaint is that she wants anyone who disagrees *with her* to be silenced, something Alamo has now endorsed by escorting Dr. Moravits from campus and censoring him.

Clearly the subject matter of Dr. Moravits’ lectures and class discussion was a matter of public concern, over which Alamo now brings down the pall of censorship. The subject of police brutality is almost weekly, if not daily, in the national and local news (likewise the subject of contemporary gender ideology). It is frankly difficult to understand how Alamo would even entertain this student’s grievance, since Dr. Moravits was hired to teach courses on government so that such topics could be discussed in the classroom within the Alamo Colleges District. No reasonable person can seriously argue that law enforcement is not a core government function appropriate for discussion in POSI 2304.

Yet this is exactly what Alamo has done by removing Dr. Moravits from POSI 2304. Above all, the actual victims are the students whose learning experience is now held hostage to one student who clamors for censorship. The class had been engaging in lively discussion. At no point did Dr. Moravits say that we “need” police brutality. In fact, as a former police officer and author of a book on policing and race, the very suggestion is personally offensive to Dr. Moravits. His chapter titled “The Murder of George Floyd” states directly: “. . . the actions of Derek Chauvin [the police officer who knelt on George Floyd’s neck until he died] were unwarranted and exhibited an example of excessive use of force.”¹ Like all good officers of the law, past or present, Dr. Moravits abhors arbitrary police brutality. His book specifically makes clear that police brutality is a serious matter that must be addressed when it occurs. In fact, at the end of this particular discussion, which seems to have caused a single complainant to feel insecure, a black male student commented how he enjoys this class in particular, because diverse student opinions were not only allowed, but they were also encouraged. Alamo should be celebrating the success of Dr. Moravits’ classes, not firing him.

In each case, the topics of discussion were clearly protected free speech and the exercise of academic freedom. It is exactly what students need and should expect from the faculty—and several students clearly expressed that they did expect this kind of exchange. Instead, Alamo’s reaction to unsubstantiated accusations has been to remove Dr. Moravits from campus under police escort, cut him off from all students, faculty, and staff, and then fire him.

B. The Non-Renewal Violates Alamo’s Policies

The Alamo policy on academic freedom and responsibilities (<https://www.alamo.edu/siteassets/district/about-us/leadership/board-of-trustees/policies-pdfs/section-d/d.3.5-policy.pdf>) clearly protects every aspect of Dr. Moravits’ expression in the classroom. Everything Dr. Moravits spoke about in class was either directly related to the subject matter of the course or responded to direct student questions that arose in response to lecture and reading material.

The relevant policy is D.3.5 and is supposed to be enforced by the Vice Chancellor for Academic Success. Because the policy is brief, I am quoting it in full here:

All members of the faculty are entitled to academic freedom as defined in the 1940 Statement of Principles on Academic Freedom and Tenure formulated by the Association of American Colleges and the American Association of University Professors as revised by these associations in November 1989 and January 1990. The pertinent provisions of this statement are as follows:

1. Teachers are entitled to full freedom in research and in the publication of the results, subject to the adequate performance of their other academic duties; but research for pecuniary return should be based upon an understanding with the authorities for the institution.

¹ The Blue Divide, at 87.

2. Teachers are entitled to freedom in the classroom in discussing the subject, but they should be careful not to introduce into their teaching controversial matter which has no relation to their subject. Limitations of academic freedom because of religious or other aims of the institution should be clearly stated in writing at the time of the appointment.

College and university teachers are citizens, members of a learned profession, and officers of an educational institution. **When they speak or write as citizens, they should be free from institutional censorship or discipline**, but their special position in the community imposes special obligations. As scholars and educational officers, they should remember that the public may judge their profession and their institution by their utterances. Hence, they should at all times be accurate, should exercise appropriate restraint, should show respect for the opinions of others, and should make every effort to indicate that they are not speaking for the institution.

(Emphasis added.)

By this policy, even if the worst of what the complainant said is true (that Dr. Moravits somehow insulted all gay members of our society as pedophiles, somehow announced that police brutality is “needed,” or openly shared with the class that some gay man or boy “jerked off” during a gay-pride parade), this would still be covered by the policy. Of course, Dr. Moravits said nothing of the sort. The point is that not even the complaining student alleges that he singled out a specific individual or student for direct insult, say because they were gay, black, male, female, trans, or any other conceivable protected category. The complainant does not identify any use of intentionally offensive slurs. The closest she comes is identifying the word “pedophilia,” which is not a slur. And Dr. Moravits did not use this word to demean any specific group of people. He merely noted a fact, that there have long been accusations among child stars in Hollywood of rampant pedophilia, which is clearly an issue of recurring public concern in the media. And he specifically pointed out that “P” in the various LGBTQ+ categories **does not** stand for pedophile but “pansexual.”

It is also relevant that Texas Education Code § 51.9315 obligates Alamo (and St. Philip’s) to respect free expression on campus. The law specifically forbids placing restrictions on expression and the right to associate unless these are “narrowly tailored to serve a significant institutional interest [and] provide for ample alternative means of expression”—which removing Dr. Moravits from class and banning him from contacting anyone, even off campus clearly is not. The law also requires Alamo to “establish disciplinary sanctions for students, student organizations, or faculty who unduly interfere with the expressive activities of others on campus,” which should be applied to the administrators who have sought to eliminate Dr. Moravits’ expression and who are responsible for his termination.

Alamo should not tolerate this kind of retaliation for the free expression and exchange of ideas. Furthermore, by escorting Dr. Moravits from campus under police guard and forbidding him to have any further contact with anyone at St. Philip’s, Alamo has also violated its policies.

Under Process B, what is called “interim remedial action” of such a drastic nature is only allowed “if . . . the safety or well-being of any member(s) of the campus community may be jeopardized by the presence on campus of the accused individual . . . whose behavior is in question.” Dr. Moravits was also supposed to be given an opportunity to “show cause why the suspension should not be implemented,” but Alamo denied him this as well. Obviously, class discussion that motivated a single student to complain about the existence of diverse viewpoints did not endanger the “safety or well-being” of anyone, not even this student, who continued to attend class and is still quite healthy and hale. If such viewpoints alone could cause this kind of “harm,” this student would be experiencing constant “trauma.” Both within the student body or within the American body politic at large, these diverse viewpoints and facts are widely known and discussed every day.

Taking the next step to fire Dr. Moravits not only compounds the violation of Alamo’s policies; it is further evidence of Alamo’s retaliation against him for his protected speech.

C. The History of Hostility to Free Expression at Alamo Directed against Dr. Moravits

Unfortunately, this is the culmination of a long history of targeted attacks on Dr. Moravits’ for his excellent teaching and expression of protected speech. In fact, as recently as August 15, 2022, Cynthia Pryor, his former mentor and current colleague, sent the following text message to another Alamo employee:

Well, I was stunned to see that Moravits hawked his book at the CPAC convention. CPAC has become a racist organization that promotes “racial purity” and supports authoritarians such as Viktor Orban in Hungary. Moravits seems to be associating with an anti-democratic group. That was surprising to me. He hid that part of his political philosophy quite well until he got the job.

And in a second text she expressed the following hostility to Dr. Moravits’ protected speech:

Personally, I wish they could push Moravits out. I’m not opposed to open dialogue about competing ideas, but he was somewhat dishonest, and the views of CPAC threaten our democracy. He needs to be vigorously challenged.

In April 2022, Dr. Moravits was also issued a “Step One Written Counseling-up” under the “Progressive Discipline” policy of Alamo (D.9.1.1). Employees of Alamo had complained about the publication of Dr. Moravits’ book and to an interview he gave on YouTube, which Alamo admits was undertaken in “[his] personal capacity.” Under no circumstances could Dr. Moravits’ utterances be taken as the viewpoints of Alamo, and he did not express them as such. Alamo also quibbled that others, over which Dr. Moravits had no control, presented him as a “professor,” although that is not his official title. He was also criticized for showing a Chris Rock video, which is likewise a public document/video of a nationally renowned comedian, and quite clearly a matter of public concern. Dr. Moravits may show such a video without anyone’s permission because it is

protected speech. Finally, Alamo likewise indulged lofty sounding rhetoric about community ethical values, the actual target of which was to muzzle Dr. Moravits for holding views that Professor Pryor and others clearly find offensive. But the hurt feelings of academic colleagues over prevailing orthodoxy in political viewpoints cannot be cause to discipline or punish Dr. Moravits.

Thus, Alamo's termination of Will Moravits comes at the end of a long process in which he has been harassed for his public utterances and for his classroom teaching. His viewpoints and speech are clearly protected by the First Amendment as well as Alamo's own policies.

II. ALAMO IS VIOLATING DR. MORAVITS' LEGAL RIGHTS

The retaliation against Dr. Moravits is actionable in Texas under state and federal law. See e.g. *Hudson v. Board of Regents of Tex. S. Univ.*, No. 4:05-CV-03297, 2009 U.S. Dist. LEXIS 126630, at *11 (S.D. Tex. Apr. 14, 2009) (denying motion for new trial where "verdict meant that Plaintiffs would not have had their rights violated but for their protected constitutional activity" and where "evidence also demonstrated considerable animus toward Plaintiffs by Defendants, because they were outspoken and, quite possibly, because of their political sympathies"); *Ward v. Lamar Univ.*, 484 S.W.3d 440, 454 (Tex. Ct. App. 2016) (reversing lower court for dismissing free-speech retaliation claim against university); *DePree v. Saunders*, 588 F.3d 282, 289 (5th Cir. 2009) (reversing summary judgment in favor of university on free-speech retaliation claim of professor targeted by fellow faculty for making them "not feel safe").

As numerous courts have held, even an investigation undertaken in retaliation for a public employee's exercise of his or her First Amendment rights has an impermissible chilling effect on speech that violates the First Amendment. See *White v. Lee*, 227 F.3d 1214 (9th Cir. 2000); *Levin v. Harleston*, 966 F.2d 85 (2d Cir. 1992); *Baumann v. District of Columbia*, 744 F. Supp. 2d 216 (D.D.C. 2010).

Given that Dr. Moravits' future employment would have extended into the Spring 2024 Semester and that Alamo cut off his Flex II pay, in addition to the deprivation of benefits that Alamo now proposes to impose upon him through a rush termination, he has certainly suffered adverse employment consequences. The "quantum of retaliation necessary to support [a] §1983 claim" need be no more than "adverse acts that 'would chill or silence a person of ordinary firmness from future First Amendment activities.'" *Morris v. Powell*, 449 F.3d 682, 687 (5th Cir. 2006) (quoting *Crawford-El v. Britton*, 320 U.S. App. D.C. 150, 93 F.3d 813, 826 (D.C. Cir. 1996) (*en banc*), *vacated on other grounds*, 523 U.S. 574, 118 S. Ct. 1584, 140 L. Ed. 2d 759 (1998)). Treating Dr. Moravits as a criminal to be placed under police escort and then firing him certainly qualifies. *Breaux v. City of Garland*, 205 F.3d 150, 157 (5th Cir. 2000) (defining "[a]dverse employment actions are discharges, demotions, refusals to hire, refusals to promote, and reprimands").

Alamo has repeatedly stated, not least in the half-hearted investigation interview conducted by Karen Ireland, that Dr. Moravits is an at will employee who can be fired even without cause. However, "at will" status, does not permit Alamo to fire him for his protected exercise of free expression. *Bd. of Cty. Comm'rs v. Umbehr*, 518 U.S. 668, 116

S. Ct. 2342 (1996) (First Amendment protects independent contractors from the termination or prevention of automatic renewal of at-will government contracts in retaliation for their exercise of the freedom of speech).

Clearly the temporal proximity to the frivolous accusations of the complainant for his January class discussions is the real cause. “Close timing between an employee’s protected activity and an adverse employment action can be a sufficient basis for a court to find a causal connection required to make out a prima facie case of retaliation.” *Mooney v. Lafayette Cty. Sch. Dist.*, 538 F. App’x 447, 454 (5th Cir. 2013).

Importantly, Alamo does not even pretend to justify firing Dr. Moravits, and any attempt to do so would be, in any case, pretextual.

III. CONCLUSION

There is a simple solution here, that would clearly be a win/win for the Alamo Colleges District as well as Dr. Moravits. Grant his pending appeal and reinstate him to full employment, including all benefits and lost income that Alamo’s pretextual investigation has imposed upon him. This will also benefit Alamo’s many students who have benefited from his classes and who are not only hungry for open discourse on campus but are also paying for it—as are the Texas taxpayers.

Should Alamo fail to do so, however, Dr. Moravits will not hesitate to seek all legal remedies at equity and at law. Alamo will also be compelled to pay his reasonable attorney fees under 42 USC § 1988(b).

If Alamo insists upon retaliating against Dr. Moravits for the exercise of his free expression, Alamo will also be going against the grain of contemporary movements in public and private education, in which prominent universities such as Stanford and Cornell have begun to act like real institutions of higher education again by opposing student complaints when controversial viewpoints hurt their feelings, or when students demand “trigger warnings,” or when would-be activists swoon over “microaggressions.” See e.g., *Hiers v. Bd. of Regents of the Univ. of N. Tex. Sys.*, No. 4:20-CV-321-SDJ, 2022 U.S. Dist. LEXIS 43617 (E.D. Tex. Mar. 11, 2022) (enforcing “bedrock principles of protecting freedom of thought and expression” where adjunct professor without any tenure protection criticized “the concept of microaggressions” as “garbage” and “silly”).

I am happy to discuss a reasonable solution to this predicament. No one, least of all Dr. Moravits, desires litigation, and it seems to be a case in which a reasonable solution that benefits all parties can be worked out.

Sincerely,



Michael Thad Allen

