

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF LYNCHBURG

JENNA DODGE, SARAH HASSMER)
HAYLEY J. MAXWELL,)
LAURA McKEAN-PERAZA)
KELSEY McCUNE,)
JENNIFER C. MULLINS,)
MARY ELIZABETH YARDLEY,)
ALICE DAMMEYER PRIEBE and)
ROY CLINTON JOHNS)

Plaintiffs,

v.

THE TRUSTEES OF RANDOLPH-MACON)
WOMAN'S COLLEGE,)
D/B/A RANDOLPH-MACON WOMAN'S COLLEGE,)
a Virginia non-stock charitable corporation)

Defendant.

Case No. CL _____ - _____

DEFENDANT'S DEMURRER

Defendant The Trustces of Randolph-Macon Woman's College (the "Trustees"), d/b/a Randolph-Macon Woman's College ("R-MWC" or "the College"), by counsel, demurs to the Complaint filed by Jenna Dodge, Sarah Hassmer, Hayley J. Maxwell, Laura McKean-Peraza, Kelsey McCune, Jennifer C. Mullins, Mary Elizabeth Yardley, Alice Dammeyer Priebe and Roy Clinton Johns ("Plaintiffs") in this matter.

On November 2, 2006, Plaintiffs filed this action against the College to enjoin it from implementing the strategic plan adopted by the College, which provided for, among other things, transitions to a coeducational environment and a "global honors" curriculum.

The authorities on which Plaintiffs rely do not provide a cause of action and/or the relief sought by Plaintiffs.

Moreover, Plaintiffs lack standing to pursue this action.

WHEREFORE, for the reasons stated herein, in the briefs filed in support of this Demurrer and in any argument before the Court, Defendant respectfully requests that the Court dismiss the action with prejudice. Defendant also requests that the Court order Plaintiffs to reimburse Defendant for the costs, fees, and expenses incurred in defending this action.

Respectfully Submitted,

**THE TRUSTEES OF RANDOLPH-MACON
WOMAN'S COLLEGE, D/B/A RANDOLPH-
MACON WOMAN'S COLLEGE**

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*Counsel for Defendant The Trustees of Randolph-
Macon Woman's College, d/b/a Randolph-Macon
Woman's College*

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of November, 2006, a true and accurate copy of the foregoing Defendant's Demurrer was hand delivered to:

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Counsel for Plaintiffs


