

**VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF LYNCHBURG**

JENNA DODGE, et al. )  
 )  
Plaintiffs, )  
 )  
v. ) Case No. \_\_\_\_\_  
 )  
THE TRUSTEES OF )  
RANDOLPH-MACON WOMAN’S COLLEGE, )  
d/b/a RANDOLPH-MACON WOMAN’S COLLEGE, )  
 )  
Defendant. )

**MOTION TO EXPEDITE**

COME NOW Plaintiffs, Jenna Dodge (“Dodge”), Sarah Hassmer (“Hassmer”), Hayley J. Maxwell (“Maxwell”), Laura McKean-Peraza (“McKean-Peraza”), Kelsey McKune (“McKune”), Jennifer C. Mullins (“Mullins”), Rebekah Lynn Pauli (“Pauli”), Jessica Whittle (“Whittle”), and Mary Elizabeth Yardley (“Yardley”), who, in support of their Complaint, file this Motion to Expedite requesting this Court to proceed with the adjudication of this case in an accelerated manner. In support thereof, Plaintiffs state the following:

1. In the wake of the vote to transition Randolph-Macon Woman’s College (“RMWC”) to a coeducational “global honors” institution beginning in the Fall of 2007, Defendant is taking steps toward implementing such plan including: (a) soliciting and receiving applications from male students for the Class of 2011; (b) soliciting construction bids for new buildings to provide housing and athletic facilities for male students; (c) contemplating the liquidation of certain assets including artwork from the

Maier museum, real property in Reading, England, and the RMWC riding center; and (d) otherwise using RMWC funds to implement the coeducational transition.

2. A change to the single-sex liberal arts educational environment of RMWC will affect hundreds of students, applicants and their families.

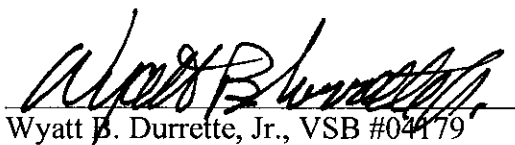
3. Students, including the Plaintiffs, are now experiencing a disruptive educational environment and will be considering whether to remain at RMWC or transfer to another single-sex college. Every day this decision is delayed makes it potentially harder for Plaintiffs to gain admission to a college of their choice if they have to transfer to continue their education in an all-women's liberal arts institution.

4. Plaintiffs, and in all likelihood Defendant, believe that the best interests of all concerned require an adjudication of this case in an expedited manner.

WHEREFORE, Plaintiffs, by counsel, respectfully ask the Court to enter an Order granting this Motion to Expedite.

JENNA DODGE

By Counsel



Wyatt B. Durrette, Jr., VSB #04479

Barrett E. Pope, VSB #20574

Halliday Moncure, VSB #71289

DURRETTEBRADSHAW PLC

600 East Main Street, 20<sup>th</sup> Floor

Richmond, Virginia 23219

Bus.: 804.775.6900

Fax: 804.775.6911