

STATE OF NORTH CAROLINA  
COUNTY OF ORANGE

FILED

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION

2020 JAN 29 P 1:09

19-CVS-1579

ORANGE CO., C.S.C.

NORTH CAROLINA DIVISION SONS OF  
CONFEDERATE VETERANS, INC.,

*Plaintiff,*

—v.—

THE UNIVERSITY OF NORTH CAROLINA  
and THE UNIVERSITY OF NORTH  
CAROLINA BOARD OF GOVERNORS,

*Defendants.*

**MOTION OF UNC ALUMNI AND  
DONORS FOR LEAVE TO FILE BRIEF  
AS *AMICUS CURIAE***

On January 10, 2020, the Court scheduled a hearing on February 12, 2020, to consider the issue of whether Plaintiff North Carolina Division Sons of Confederate Veterans (“SCV”) had standing to bring suit against Defendants University of North Carolina and University of North Carolina Board of Governors (“University defendants”). The Court invited the parties and *amici* UNC Students and Faculty to file briefs on the standing issue on or before January 29, 2020. UNC Alumni and Donors, a group of 88 alumni and donors to the University, hereby move the Court for leave to file a brief as *amici curiae*. In accordance with the Court’s briefing schedule, *amici* UNC Alumni and Donors are conditionally filing their brief contemporaneously with this motion.

**NATURE OF INTEREST OF *AMICI CURIAE***

*Amici* are UNC alumni who love and respect the University; many make voluntary contributions to support it. They believe that the University’s payment of \$2.5 million to SCV to receive and maintain the Confederate monument that stood on the Chapel Hill campus is a misuse of University funds. In their view, the Consent Judgment seriously damages the reputation of the

University, which should be committed to historical truth and opposed to modern-day white supremacy.

Fourteen of the *amici* are UNC Black Pioneers, an association of black students who had the courage to break the color barrier at UNC-Chapel Hill between 1952 and 1972. These *amici* are listed below in alphabetical order, with their UNC class year in parentheses, followed by brief biographical information.

Karl Adkins (B.A. 1968) is a retired judge. After receiving his law degree at the University of Michigan, he practiced law in Charlotte with Julius Chambers, and then served as Superior Court Judge in Mecklenburg County, and Chair of the North Carolina Board of Law Examiners.

Kelly Alexander, Jr. (B.A. 1970, M.P.A. 1973) is a funeral director in Charlotte and a member of the North Carolina House of Representatives.

Sondra Davis Burford (B.A. 1969), a retired general accountant, lives in Sanford.

Philip L. Clay (B.A. 1968), is a professor of housing policy and city planning at the Massachusetts Institute of Technology. He received a Ph.D. in City Planning from MIT in 1975 and served as MIT's Chancellor from 2001 to 2011.

James E. Cofield, Jr. (B.S. 1967) is a retired real estate developer, now living in Duck. He received an M.B.A. from Stanford in 1970. He was president of New England's leading mortgage firm and is a former president of the Massachusetts Mortgage Bankers Association, a former first vice president and member of the Executive Committee of the Greater Boston Chamber of Commerce, and a former chairman of the Audit Committee of WGBH Educational Foundation. He is a member of the North Carolina Complete Count Commission.

Algin Holloway (B.A. 1968), a retired educator, lives in Durham.

Eddie L. Hoover (B.A. 1965), a retired cardiothoracic surgeon from Charlotte, was a professor and chairman of the Department of Surgery at SUNY-Buffalo and editor-in-chief of the Journal of the National Medical Association. He received his medical degree from Duke. On December 20, 2019, the Charlotte Observer published a letter from Dr. Hoover objecting to the settlement agreement in this case.

Edith A. Hubbard (B.A. 1966, M.A. 1970) was the second black woman to graduate from UNC. She served as Associate Director of Research Services at UNC, with signature authority over all applications for research grants and contracts. In 2016, she received the

Trailblazer Award from the UNC General Alumni Association. Her daughter (1987) and granddaughter (2015) both graduated from UNC-Chapel Hill.

Walter Jackson (B.A. 1967) received a Master's in Public Administration from Harvard University. After serving in the U.S. Army, he became a journalist, business owner, and public administrator. Now retired, he lives in Durham. He received the Trailblazer Award from the UNC General Alumni Association in 2018. Mr. Jackson is Chair of UNC Black Pioneers.

Karen L. Parker (B. A. 1965) was the first black woman to graduate from UNC. During her senior year, she served as editor of the School of Journalism's student newspaper. She worked as a journalist in Michigan and California before returning to North Carolina to work for one of the state's largest newspapers. Now retired, she lives in Winston-Salem. She has served on the board of the UNC General Alumni Association and on the university's Friends of the Library board. In 2012, she was inducted into the NC Media & Journalism Hall of Fame. She is one of the founders of the UNC Black Pioneers.

Melvin L. Watt (B.S. 1967) received his law degree from Yale University in 1970, and practiced law in Charlotte with Julius Chambers. He served for 21 years in the United States House of Representatives, and then five years as Director of the Federal Housing Financing Agency.

Nathaniel White, Jr. (doctoral program, 1967-69) is a resource development consultant in Atlanta. He was the initial president of the Hayti Development Corporation in Durham, and co-authored a book on statistics.

Otto White, Jr. (B.S. 1965, M.S.P.H. 1967), a retired health and safety manager/scientist, lives in Chapel Hill. His career included work with the U.S. Atomic Energy Commission, U.S. Department of Labor, and 27 years on the scientific staff at Brookhaven National Laboratory. He has served as on the board of the American Industrial Hygiene Association. He received the Trailblazer Award from the UNC GAA in 2019.

Joanne A. P. Wilson (B.S. 1969) is a Professor of Gastroenterology at Duke University Medical Center. She received her M.D. from Duke in 1973.

The other 74 *amici* are listed below in alphabetical order, with their UNC class year in parentheses, followed by brief biographical information.

Monica S. Aswani (B.S. 2006) is a professor in Birmingham, Alabama, who focuses on health care policy and economics. She was a recipient of the Carolina Undergraduate Health Fellowship at UNC and received her MSPH (2010) and DrPH (2018) in health care organization and policy from the University of Alabama at Birmingham. She is a member of the UNC Center for Global Initiatives Alumni Network and the UNC GAA.

Elbert L. Avery (B.A. 1982) is a senior business services manager and lives in Durham. He was a Morehead Scholar at UNC, is a Chancellor's Club Donor, and has been active with the GAA Board, the Stone Center Advisory Board, and the Board of Visitors. He received an M.B.A. from the University of Wisconsin-Madison School of Business in 1984.

Stephen G. Barber (B.A. 2009) is a special projects manager and lives in Baltimore. He received a M.S.Ed. from the University of Pennsylvania in 2016 and is pursuing an Ed.D. at Vanderbilt Peabody College.

Joyce Blackwell (Ph.D. 1998) is Chief Academic Officer at Piedmont Community College. She is a former history professor and has held other positions in university administration. She lives in Durham.

Calvin L. Blanton (B.S. 1976) is an accountant with over two decades of experience in public accounting and auditing. He is the principal of a financial management, operational management, and income tax planning firm. He lives in Raleigh.

John Charles Boger (J.D. 1974) taught at UNC Law School for 27 years, serving as Dean from 2006 to 2015. Before coming to the law school, he was an attorney for the NAACP Legal Defense Fund and directed LDF's Capital Punishment Project. He began donating to UNC three decades ago and is a Lifetime William Horn Battle Society member.

Taylor Branch (B.A. 1968), an author and historian, wrote the acclaimed three-volume biography of Martin Luther King, Jr. In 1989 he won the Pulitzer Prize for History. He received a five-year MacArthur Foundation Fellowship in 1991 and the National Humanities Medal in 1999.

Wendell Camp (B.A. 1996), a resident of Wake Forest, was on the UNC football team and has served as a chair of the Black Alumni Reunion. He has earned an M.B.A.

Joseph B. Cheshire, V. (B.A. 1970) is a criminal defense lawyer in Raleigh. He helped establish the Indigent Defense Services Commission, and served as Chair of the IDS Commission for eight of its first ten years. He was President of the North Carolina Advocates for Justice, and received its Thurgood Marshall Award. He helped found and served as President of the Make a Difference Foundation.

Bernadine Cobb (B.A. 1984) is a banking executive and lives in Durham. She is former chair of the UNC Black Alumni Committee and has been active with the boards of the Interfaith Council, YESICAN and the LOTH Society.

Louise Weeks Coggins (B.A. 1974, M.S.W. 1980), is a psychotherapist in Wilmington. Since her graduation from UNC, she has donated every year and to every capital campaign. She is a member of the UNC Women's Leadership Forum and has assisted its fundraising efforts. She has chaired the Board of Advisors of the UNC School of Social Work for more than 15 years, and has helped lead the School's last three capital campaigns.

Steve Coggins (B.A. 1974) is an attorney in Wilmington. As a student at UNC, he was a member of the Order of the Old Well. The NC Bar Association recognized him as Pro Bono Attorney of the Year in 2000. He has been an active supporter of Habitat for Humanity, StepUp Wilmington, Fuller Center for Housing, and Lift Up the Vulnerable. He has been a donor to UNC every year since his graduation.

Cynthia G. Crawford-Green (B.S. 1976, M.D. 1980) is a cardiologist and lives in Bowie, Maryland. Dr. Crawford-Green is the first African-American female to receive a B.S. in Zoology at UNC.

Walter Dellinger (B.A. 1963) is the Douglas B. Maggs Emeritus Professor of Law at Duke University and a partner in O'Melveny & Myers in Washington, DC. He received the Frank Porter Graham Award as Outstanding Senior in the class of '63. After graduating from Yale Law School in 1966, he clerked for Justice Hugo Black on the U.S. Supreme Court. He served as Assistant Attorney General and acting Solicitor General of the U.S. He lives in Chapel Hill.

Nora M. Wilson Dennis (M.D. 2001, M.P.H. 2008) is a physician and lives in Hillsborough. She was a Morehead Scholar at UNC.

Sally K. Dove (B.A. 1974, B.S. 1979) is retired after a 35-year career in nursing. She is a member of the UNC GAA and a donor to the School of Nursing and the Sonya Haynes Stone Gift Fund. She lives in Raleigh.

James G. Exum, Jr. (B.A. 1957), former Chief Justice of the North Carolina Supreme Court, lives in Greensboro. He has been a member of the N.C. House of Representatives, a superior court judge, Associate Justice of the Supreme Court, and Chief Justice from 1986 to 1994. A Morehead Scholar at UNC, he has served as a member of the UNC Board of Visitors and as President of the General Alumni Association, and has been a regular donor to the University.

Valerie Foushee (B.A. 1978), a resident of Hillsborough, is State Senator for the district that includes Chapel Hill. She was elected to the Board of Education for the Chapel Hill - Carrboro City Schools in 1997, and served as Chair from 2001-2003. In 2004 she became the first African-American woman elected to the Orange County Board of Commissioners, and served as Chair from 2008-2010. She has served on the UNC Board of Visitors.

Thomas Ginn (B.A. 2010) graduated from UNC with highest honors and highest distinction in economics and mathematics, and then received a Ph.D. in economics from Stanford University. He is a fellow at the Center for Global Development, where his current research focuses on aid for refugees in lower-income countries. He is a regular donor to UNC.

Arlee Griffin Jr. (B.A. 1980) is a pastor and lives in Louisburg. He received a Master of Divinity from Southeastern Baptist Theological Seminary, a Doctor of Ministry from

Boston University in 1992, and a M.P.A. from the John F. Kennedy School of Government at Harvard University in 2010.

Clay Hackney (B.A. 2015) is a student at Harvard Law School. At UNC, he was a Morehead-Cain Scholar, received the Dean's Prize for Economics, and was a volunteer at the Community Empowerment Fund and the Campus Y. Since graduating he has been a consistent donor and has helped fundraise for UNC.

Gerry Hancock (B.A. 1965) is a Raleigh lawyer. He served two terms in the North Carolina Senate, and was Founding Chair of the North Carolina Public School Forum. He is a former member of the Board of Directors of the UNC General Alumni Association.

Douglas A.P. Hamilton (B.S. 1969) financed and helped grow more than 60 companies in a 50-year career that includes working in private equity. He has been a donor to UNC and served on the advisory board of the minor degree in entrepreneurship. He is retired and lives in Atlanta, Georgia.

Ida Dew Hickerson (B.Ed. 1974), a retired educator, lives in Charlotte.

Clarence High, Jr. (B.A. 1979), a resident of Roanoke Rapids, retired from the N.C. Department of Public Safety. He was the Chief Court Counselor in Judicial District 6. He has been a UNC donor.

Joseph C. High (B.S. 1976) is a retired corporate officer. He and his wife, Kathleen (B.A. 1978), are Chancellor's Level donors, Gerald Society members, and the first African-Americans to create an endowed scholarship, The Joseph Cooley and Kathleen Cullins High Koinonia Scholarship Fund, at the Kenan-Flagler School of Business. Joseph serves on the Kenan-Flagler Board of Advisors and the Rams Club Board of Advisors. He has previously served on the UNC Board of Advisors. The recipient of the Kenan-Flagler Distinguished Alumni Award, he lives in Chapel Hill.

Kathleen Cullins High (B.A. 1978) is a retired social worker. She and her husband, Joseph (B.S. 1976), are Chancellor's Level donors, Gerald Society members, and the first African-Americans to create an endowed scholarship, The Joseph Cooley and Kathleen Cullins High Koinonia Scholarship Fund, at the Kenan-Flagler School of Business. She lives in Chapel Hill.

Patrice High (B.A. 2003) is a teacher who lives in Durham and has been in public education for 16 years. She has been active in the UNC General Alumni Association, the Johnson Center for Undergraduate Excellence, and the Minority Student Recruitment Committee.

Malcolm ("Tye") Hunter (B.A. 1975, J.D. 1976) is a lawyer who lives in Chapel Hill. He has served as the Appellate Defender in the Office of Appellate Defense, the Executive Director of the Indigent Defense Services Commission, and the Executive Director of the Center for Death Penalty Litigation. He is Treasurer of the Orange County Chapter of the NAACP.

Cari Jeffries (B.A. 2014) was a Morehead-Cain Scholar at UNC, received her J.D. from Stanford Law School, and is now a litigation attorney in Washington, D.C. She has been a regular donor to UNC since graduation, and serves as an alumni mentor for the Carolina Honors Program.

Nicole Johnson (B.A. 2014) graduated from UNC with highest honors and also holds an M.A. from Georgetown University's School of Foreign Service. She currently lives in London, where she works as a communications officer covering migration, displacement, and development policy.

Thomas Bradley Johnson (B.A. 1992) is a transportation director and lives in Durham. He is a UNC GAA member and has served on the Project Uplift 50 Steering Committee.

Valerie Johnson (B.A. 1987, J.D. 1994) is a lawyer in Durham, specializing in workers' compensation law. She currently serves on the boards of the North Carolina Advocates for Justice and Lawyers Mutual Insurance Company. Since 2003 she has been an adjunct professor at UNC Law School, teaching trial advocacy.

Alexander Julian majored in English at UNC in the late 1960s. A renowned clothing designer, he was inducted into the Fashion Hall of Fame at age 33. He has been a long-time donor and fundraiser for the University. In 1986 his gift to UNC established the Mary and Maurice Julian Scholarships for students with financial needs. A recipient of the UNC Distinguished Alumni Award and the Order of the Long Leaf Pine, he lives in Chapel Hill.

Missy Julian-Fox (B.A. 1973) is an author and an organization project manager, and former Director of the UNC Visitors Center. She received a M.Ed. from Boston University. She lives in Chapel Hill.

William Leimenstoll (B.A. 2013) was Student Body President at UNC. Since his graduation, he has been a Henry Luce Scholar in Thailand, an AmeriCorps member with Habitat for Humanity, and worked at the U.S. EPA. He is currently pursuing a joint MBA and Masters of City & Regional Planning at UNC-Chapel Hill. He has contributed to UNC every year since he graduated.

Steve Levitas (B.A. 1976) lives in Raleigh. After graduating from Harvard Law School, he founded the North Carolina office of the Environmental Defense Fund, served as Deputy Secretary of the N.C. Department of Environment Health and Natural Resources, was a partner for twenty years in leading North Carolina law firms, and for the past four years has been an executive in the solar industry. He served for eighteen years on the Board of Visitors of the Institute for the Environment at UNC, including six as its original chairman.

Howard E. Manning, Jr. (B.A. 1965, J.D. 1968) is a retired judge. After serving in the Navy JAG Corps and practicing law in Raleigh, he was a superior court judge for 21 years. During most of that time, he presided over the *Leandro* litigation, seeking to implement the Supreme Court's landmark ruling that every child in North Carolina has a fundamental

right to a sound basic education. He received the Distinguished Alumni Award from UNC Law School, the Peabody Award from UNC School of Education, and the Judge John J. Parker Award from the N.C. Bar Association.

William A. “Drew” Marsh III (J.D. 1982), a retired district court judge, is senior deputy general counsel at NC Department of Transportation. He lives in Durham.

Allen Mask (B.A. 1974, M.D. 1978), a Raleigh internist, lives in Chapel Hill.

Philip McAlpin (B.S. 1975), a retired sports marketing executive, lives in Greensboro. He has served as a member of the board of the UNC General Alumni Association and the UNC Board of Visitors, and has chaired the UNC Black Alumni Reunion.

George E. McDaniel, Jr. entered UNC in 1963 as a zoology major coming from Goldsboro. He is now a retired commercial bank CEO and lives in Oakland, California. After serving in the U.S. Army in Vietnam, he received an M.B.A. from Indiana University and was an executive with Wells Fargo and other major banks. He founded one of the first private equity buyout firms in the U.S. and is a co-founder of African-Americans for Economic Empowerment.

S. Charmaine McKissick-Melton (B.A. 1977) is a daughter of the late national civil rights leader Floyd McKissick, one of the first African-American students at UNC when he and others were admitted to the Law School in 1952 as a result of a court order. Dr. McKissick-Melton received an M.A. from Northern Illinois University in 1978 and a Ph.D. from the University of Kentucky in 2001. She is now an associate professor of mass communications at North Carolina Central University and lives in Durham.

Angelia Euba McKoy (B.A. 1993), an educator, currently leads the International Baccalaureate Program for Durham Public Schools. She is a former North Carolina Teaching Fellows Scholar and a former All-American on the UNC track and field team. She is a Life Member of the UNC GAA and a Rams Club Member. She lives in Durham.

Henry Clay McKoy, Jr. (B.S. 1995, Ph.D. 2018) is a professor of entrepreneurship and a former Assistant Secretary at the N.C. Department of Commerce. He received an M.S. degree from Duke University. Dr. McKoy holds academic appointments at North Carolina Central University, Duke University, Kenan-Flagler School of Business, and Harvard University. He is a former National Champion and two-time All-American on the UNC track and field team. He is a Life Member of the UNC GAA and a Rams Club Member. Dr. McKoy lives in Durham.

Dan J. McLamb (B.A. 1971, J.D. 1974) is a lawyer in Raleigh. In 2019 he received the North Carolina Association of Defense Attorneys’ Award for Excellence in Trial Advocacy. He is a former member of the UNC Law Alumni Board, and currently serves on the UNC Board of Visitors.

William Mills (B.A. 1973, J.D. 1976) is a lawyer in Durham and a former President of the North Carolina Advocates for Justice. He is serving this third three-year term as a State



Bar Councilor for the Fourteenth Judicial District and is Vice Chair of the State Bar Ethics Committee. For many years, he has taught trial advocacy at UNC Law School. He is a past member of the UNC Board of Visitors.

Lisa V. Moore (M.B.A. 1995) is a global sales executive and lives in St. Augustine, Florida.

Melzer A. (Pat) Morgan, Jr. (B.A. 1962, J.D. 1967), a retired judge, lives in Chapel Hill. In 1962, he was the first Carolina undergraduate in the Peace Corps (Dominican Republic). He was Senior Resident Superior Court Judge in Reidsville for 23 years, served on the Indigent Defense Commission, and is a recipient of the Order of the Long Leaf Pine. He was the founding president of Reidsville Habitat for Humanity. He has been a donor to UNC Law School and the School of Government, and is a Life Member of the UNC Alumni Association.

Paula R. Newsome (B.S. 1977) is an optometrist and lives in Charlotte. She has pledged \$1,000,000 to UNC and served on the GAA and the Board of Visitors. Dr. Newsome is the first African-American female member of the Academy of Optometry.

John P. (“Jack”) O’Hale (B.A. 1972, J.D. 1975) is a criminal defense lawyer in Smithfield. He served on the Johnston County Board of Education from 2001 to 2009, and on the Board of Directors of the UNC Law School Alumni Association from 2001 to 2017, and three terms on the UNC Law Foundation Board. He is currently a member of the UNC Board of Visitors. He and his wife Claudia Ward O’Hale have established the O’Hale Ward academic merit scholarship at UNC Law School.

Robert F. Orr (B.A. 1971, J.D. 1975) is a lawyer in Raleigh and former Associate Justice of the North Carolina Supreme Court. He served as a judge on the Court of Appeals from 1986 to 1994, and on the Supreme Court from 1995 to 2004. He has periodically contributed to UNC-CH and the Law School.

Carla Overbeck (B.A. 1990) was a three-time All-America soccer player at UNC. In each of her four seasons, her team was undefeated and won the national championship. She was a key player on the U.S. team that won the Women’s World Cup in 1991, and captained the U.S. Olympic team that won the gold medal in 1996, and the 1999 Women’s World Cup Champions. In 2006, she was elected to the National Soccer Hall of Fame. Since 1992, she has been an assistant coach for the Duke women’s soccer team. She has donated to UNC as a member of the General Alumni Association. She lives in Chapel Hill.

Moses G. Parker (B.S. 1976) is retired and lives in Mitchellville, Maryland. He was a member of the UNC Freshmen Basketball Team from 1970 to 1971.

Jane Smith Patterson (B.A. 1961) is a technology executive in Chapel Hill. She worked for Governor Jim Hunt through his four terms in office, first as secretary of administration, then as chief advisor for policy, budget and technology, and finally as senior advisor for science and technology and director of the office for technology. For decades she has served as a trustee of the Z. Smith Reynolds Foundation. In 2017, she received the North

Carolina Award, the state's highest civilian honor, for being "an advocate for equality for women and minorities throughout her life and her leadership in digital technology." She is a Life Member of the UNC Alumni Association, and a former member of the UNC Alumni Board and the UNC Board of Visitors.

Samuel H. Poole (B.A. 1956, J.D. 1962), a retired attorney, lives in Pinehurst. He served as Chair of the UNC Board of Governors, and was U.S. Representative to the Organization for Security and Cooperation in Europe.

John Russell (B.A. 1977), a writer and a retired lawyer, lives in Raleigh. He has served as Chair of the Advisory Board of UNC's Center for Studies of the American South, member of the Advisory Board of the UNC School of Public Health, and member of the Advisory Board of the UNC Center for Global Initiatives, all of which included fundraising responsibilities. He is a Life Member of the UNC-Chapel Hill Alumni Association, and has been an annual donor to UNC-Chapel Hill for over thirty years.

Katherine Lowell Russell (B.A. 2009, J.D. 2014) is a staff attorney in the consumer law unit of Colorado Legal Services. She lives in Englewood, Colorado.

Denise White Sampson (B.A. 1973) is retired and lives in Raleigh. She had been a labor market analyst for the NC Department of Commerce.

John Sarratt (B.A. 1969), an arbitrator and mediator in Raleigh, was a Morehead Scholar at UNC. He has served on the Board of Governors of the North Carolina Bar Association, on the North Carolina General Statutes Commission, on the Board of Directors and as President of Legal Services of North Carolina. Currently he is President of the North Carolina Civil Collaborative Law Association and President of the Global Collaborative Law Council. He has been a regular donor to UNC.

Ellis Stanley (B.A. 1973) is managing partner of a business in Roswell, Georgia. He is immediate past chairman of the Global Board of the International Association of Emergency Managers.

Donald W. Stephens (B.S. 1967, J.D. 1970), a retired judge, lives in Cary. After five years of active duty in the U.S Marine Corps, he returned home to serve as Assistant District Attorney in Durham and then as Special Deputy Attorney General in charge of the Special Prosecutions Division. Appointed a Superior Court Judge in 1984, he was elected and re-elected to that position for 33 years, retiring as Senior Resident Judge in 2017. He is a lifelong donor to UNC, and a Life Member of the UNC Alumni Association.

Hugh Stevens (B.A. 1965, J.D. 1968) is a nationally-recognized First Amendment lawyer, counsel *emeritus* to the North Carolina Press Association, and a member of the NC Media & Journalism Hall of Fame. He was co-editor of *The Daily Tar Heel* in 1964-65. He is a long-time donor to UNC and past chair of the Friends of the UNC Library.

Deborah L. Stroman (M.A. 1986) is an entrepreneur and a professor. She teaches at UNC Gillings School of Global Public Health and has taught at the Kenan-Flagler Business

School and the College of Arts & Sciences. Dr. Stroman is a member of the Order of the Golden Fleece, Chairperson Emeritus of the Carolina Black Caucus, and UNC's first African-American female coach. She received a B.S. from the University of Virginia in 1982 and a Ph.D. from Capella University in 2007. She lives in Chapel Hill.

Richard M. Taylor, Jr. (B.A. 1970, J.D. 1972), a retired lawyer, lives in Chapel Hill. He served as Executive Director of Legal Aid of North Carolina, and then as Executive Director of the North Carolina Academy of Trial Lawyers and North Carolina Advocates for Justice.

Kamala Uzzell (B.A. 1996) is a psychotherapist and an adjunct professor of psychology. She was the chair of the UNC Black Alumni Reunion in 2010, is a Life Member of the GAA, and has hosted and trained 11 UNC undergraduate interns. She is a donor to the Light on the Hill Scholarship, the Sonja Haynes Stone Center, and the College of Arts and Sciences. Dr. Uzzell received an M.A. from Campbell University in 1999 and a Ph.D. from North Carolina State University in 2007. She lives in Durham.

Kenyatta L. Uzzell (B.A. 1993) is the founder and president of an executive search firm. He is a Life Member of the UNC GAA and a Life Member of the Omega Psi Phi Fraternity. Kenyatta received an M.B.A. from Howard University in 1996. He lives in Chantilly, Virginia.

John Wallace (B.A. 1973) is a lawyer in Raleigh, concentrating in the field of election law, including campaign finance law, litigation, and voter protection. He has been a long-time contributor to the University.

Colin Ward (B.S. 2014) was a Robertson Scholar and varsity rower for the UNC men's crew team. He received his master of science in health policy, planning and financing jointly from the London School of Economics and the London School of Hygiene & Tropical Medicine. He has donated to and fundraised for the UNC School of Public Health and the UNC men's crew team.

Barbara (Bonnie) Weyher (B.A. 1973, J.D. 1977), is a lawyer in Raleigh. She served as President of the North Carolina State Bar, and received the Bar's John B. McMillan Distinguished Service Award in 2018. She is a Past President of the UNC Law Alumni Board and received the UNC Distinguished Alumni Award in 2014. She currently serves on the UNC Board of Visitors.

Deborah C. Wilder (B.A. 1975), a retired project manager, lives in Upper Marlboro, Maryland. She received a Master's in Public Administration from Ohio State. She is a former member of the UNC Board of Visitors and is a founding member of the Light on the Hill Scholarship Fund and a Life Member of the UNC GAA.

Melvin L. Williams Jr. (B.A. 1985) is employed by the State of North Carolina and lives in Raleigh. He is a Life Member of the UNC GAA, a member of the Rams Club, and played on the UNC Football Team. He founded the non-profit Proud Fathers, Inc.

Kathy Wilson-Duprey (B.A. 1988), a principal of Life Leadership, LLC, is an organizational development strategist, coach, speaker and author. She played on the UNC Women's Basketball Team for four years and was First Team All-Conference. She later played professionally and was a women's college basketball assistant coach. She lives in Alexandria, Virginia.

Robert Zaytoun (B.A. 1971, J.D. 1975) is a Raleigh lawyer. He has served on the North Carolina Health and Wellness Trust Fund Commission, and on the board of the North Carolina Symphony. He is a member of the UNC Board of Visitors. As a member of the Cornerstone Committee, he raises funds for UNC Law School Endowment, and is a donor to the UNC School of Medicine Foundation for Children with Hearing Impairments.

### **REASONS WHY AN *AMICUS* BRIEF IS DESIRABLE**

When the Court entered the Consent Judgment, it did not have the benefit of an accurate and complete historical record. To assist the Court in determining whether SCV had standing to bring suit against the University defendants, the brief of *amici* UNC Alumni and Donors thoroughly reviews the historical evidence, and provides a detailed affidavit from Cecelia Moore, the recently retired UNC historian. The evidence decisively establishes that, contrary to the representations of the parties, the Confederate monument on the Chapel Hill campus was always owned by the University, and neither the United Daughters of the Confederacy nor SCV have ever had any ownership interest in the monument. Lacking any ownership interest, SCV had no standing to bring suit. And because SCV had no standing, the Court had no jurisdiction to enter the Consent Judgment.

### **QUESTION OF LAW TO BE ADDRESSED IN THE *AMICUS* BRIEF**

The *amicus* brief addresses the following question of law: Did SCV have standing to bring suit against the University defendants?

### **POSITION OF *AMICUS CURIAE* ON THE QUESTION OF LAW**

SCV did not have standing to bring suit against the University defendants.

## CONCLUSION

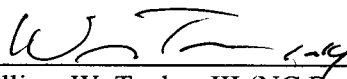
For the foregoing reasons, *amici* UNC Alumni and Donors respectfully request that the Court permit them to file a brief as *amici curiae*.

This the 29<sup>th</sup> day of January, 2020.



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on all parties by email and by depositing a true copy thereof with the United States Postal Service, first class postage prepaid, addressed to the following:

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