



TABLE OF CONTENTS

Page:

*NTEU*

*NTEU*



TABLE OF AUTHORITIES

Page(s):

Cases:

*Adams v. Trs. of the Univ. of N.C.-Wilmington*

*Arnett v. Kennedy*

*Brady v. Tamburini*

*Brown v. Perez*

*Buchanan v. Alexander*

*Davis v. Phenix City*

*Demers v. Austin*

*Elepreneurs Holdings, LLC v. Benson*

*Fairchild v. Liberty Indep. Sch. Dist.*

*Garcetti v. Ceballos*

*Harris v. Noxubee County*

*Hersh v. United States ex rel. Mukasey*

*Hiers v. Bd. of Regents of the Univ. of N. Tex. Sys.*

*Hoover v. Morales,*

*Int'l Ass'n of Firefighters Loc. 3233 v. Frenchtown Charter Twp.*

*Jones v. Matkin*

*Keyishian v. Bd. of Regents*

*Korf v. Ball State University*

*Liverman v. City of Petersburg*

*Meriwether v. Hartop*

*Moore v. City of Kilgore*

*Morrow v. Harwell*

*Murphy Expl. & Prod. Co. v. Oryx Energy Co.*

*Nat'l Inst. of Fam. & Life Advocs. v. Becerra*

*Nat'l Treasury Emps. Union v. United States*

*Paul Ins. Co. v. Trejo*

*Phillips v. Collin Cmty. Coll. Dist.*

*Pickering v. Bd. of Educ.*

*Powell v. McCormack*

*Robinson v. Hunt*

*Serafine v. Branaman,*

*Stuntz v. Ashland Elastomers, LLC*

*Sweezy v. New Hampshire*

*Turner Broad. Sys., Inc. v. F.C.C.*

*Turner Bros. Crane & Rigging, LLC*

*United States v. Nat'l Treasury Emps. Union*

*passim*

*Wells Real Est. Inv. Trust II, Inc. v. Chardon/Hato Rey P'ship, S.E.*

Statutes

Rules

## INTRODUCTION





*any*

Defendants' Fourth Statement of Issue:

Plaintiff's Response:

RESPONSE TO STATEMENT OF UNDISPUTED MATERIAL FACTS

*Dr. Phillips Challenges the Code of Ethics Provision Forcing Employees to Bring Concerns About the College to the College.*



*Although Dr. Matkin's Email Directive I*

*Washington Post*

*Washington Post*

*Id.*





*NTEU*

*Turner Broad. Sys.,*

*Inc. v. F.C.C.*









*Jones v. Matkin*

*speaking as private*

*citizens*

*harms*

*Garcetti v. Ceballos*

*Adams v.*

*Trs. of the Univ. of N.C.-Wilmington*

*Meriwether v.*

*Hartop*

*Demers v. Austin*

*Garcetti*

*pursuant to their job duties as a professor or as a private citizen*

*Buchanan*

*Garcetti*

*NTEU.*

*NTEU*









Korf

Korf

*Id.*

*Id.*



structure

*Id.*

*Hiers*

- A. No reasonable employee could understand the code of ethics.

*Fairchild v. Liberty Indep.*

*Sch. Dist.*



*Elepreneurs*

*Morrow v. Harwell*

*Robinson*

*Id.*



CERTIFICATE OF SERVICE

/s/ Greg H. Greubel