IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

, Plaintiff,	
et al.,	
Defendants.	

REPLY BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT ON CAUSES OF ACTION THREE, FOUR, FIVE, SIX, AND SEVEN

REG AROLD

TABLE OF CONTENTS

Pag	е

TABLE OF AUTHORITIES

Page(s):

Cases: Buchanan v. Alexander, .)....., Colson v. Grohman. (.)..... Healy v. James,)..... Jones v. Matkin, (. . . , Lane v. Franks, Mote v. Walthall, (. . ,) Mote v. Walthall, .)..... Reed v. Town of Gilbert, . . ()...... Other Authorities: . , Collin College and Emporia State University Added to Censure List (,)

,

. (.

, , ,

.

.

. () ()-..()-

,

ARGUMENT

I. Defendants Admit That the Code of Ethics Reaches Protected Speech Like Dr. Phillips's Allegedly Disrespectful Criticism of His Superiors on Social Media Challenged in Cause of Action Six.

!

		,		
	. Healy v. Ja	mes,,	(). ,	
				. Jones
v. Matkin,).	,	, * (,)
				. Buchanan,
. (().			
			•	,
	Pickering	NTEU		
				, .

II. Dr. Phillips's As-Applied Challenges to Defendants' Policies in Cause of Action Six Require Only That Defendants Applied a Policy in a Way That Violated His Constitutional Rights.

, ,

III. Defendant Matkin Is a Final Policymaker Under Cause of Action Seven.

Monell

!

CERTIFICATE OF SERVICE

BERNATHY OEDER OYD & ULLETT, BERNATHY OEDER OYD & ULLETT, BERNATHY OEDER OYD & ULLETT, Counsel for Defendants Collin Community College District, H. Neil Matkin, Abe Johnson, Mary Barnes-Tilley, Kristen Streater, and Chaelle O'Quin ATTHEWS HIELS NOTT DEN AVIS ATTHEWS HIELS NOTT DEN AVIS & EANLAND - ALLAS & EANLAND - ALLAS Counsel for Defendant Board of Trustees of Collin Community College District /s/ Greg H. Greubel