

STATE OF VERMONT
SUPERIOR COURT
CIVIL DIVISION

Plaintiff,

Defendants

ORAL ARGUMENT
REQUESTED

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STATUTES

SUMMARY OF ARGUMENT

Swartz v. Insogna

in general

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Swartz v. Insogna

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Id

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privacy and security of individuals against arbitrary
invasions Delaware v. Prouse

Id

always

before effecting the stop Marcello

St. Martin

II. Bombard Is Entitled to Summary Judgment on His Retaliatory Stop Claim (Count II) Because No Rational Factfinder Would View the Unlawful Stop as Substantially Motivated by Anything Other Than Bombard's Protected Speech.

See *Salter v. Douglas MacArthur State Tech. Coll.*

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See *Pointdujour v. Mount Sinai Hosp.*

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cf. *Richardson v. Bonds*

genuine

See

Id.

Id.

Id.

Id.

Id.

Id.

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Seeid.

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See

mens rea

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id.

id

Kelly v. Town of Barnard

mens rea

IV. Bombard Is Entitled to Summary Judgment on His Viewpoint
Discrimination Claim (Count V).

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see also

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Matal v. Tam

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See State v. McDermott

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See

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FOUNDATION FOR INDIVIDUAL RIGHTS
AND EXPRESSION

/s/ Gary Sarachan*