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Higher Education Highlights

The Newsletter of the Higher Education Practice

CONTENTS

Does Your Institution Have a Disability Accommodation Policy? It Should.

By Dena B. Calo

The Americans with Disabilities Act Amendments Act ("ADA") prohibits discrimination against individuals with disabilities. The ADA also requires an employer to make reasonable accommodations for the known disabilities of an individual in order to allow the individual to perform the essential functions of the job. A stand-alone ADA Accommodation Policy demonstrates the institution's commitment to the law by prohibiting discrimination and encouraging reasonable accommodations. A good policy will establish a workable and understandable employee accommodation request procedure, require medical documentation where warranted, and generally describe the interactive process that occurs once an accommodation request is made. By maintaining and following its policy, the institution can maintain a consistent approach, reduce risk when disability accommodation questions arise, and better defend disability discrimination claims.

In accordance with the ADA, an individual is considered disabled when a physical or mental impairment substantially limits a major life activity. Employers must reasonably accommodate ADA disabilities in such a way that allows the individual to perform the essential functions of the job. That generally means the employer must provide some assistive device (such as an ergonomic chair), change the employee's schedule (with flexible or reduced hours), or even allow the employee to telecommute, take a leave of absence, or transfer to an open position, if doing so would allow the disabled person to complete all essential job tasks.

In order to determine what accommodations are reasonable in a given situation, the employer and employee must engage in an informal interactive process where the employee's limitations are described and possible solutions are discussed which would allow the employee to continue performing the essential job functions. Both the employer and employee must engage in the interactive process in good faith.

An employer's ADA Accommodation Policy will greatly support the institution's good faith requirements by explaining both the accommodation request and interactive processes in detail. For example, the policy should describe how accommodation requests are made, by whom, to whom, and any supporting documents necessary. In this regard, the policy should require that any accommodation request be made *by the employee* in the first instance. In that way, the employer cannot get boxed into a position of guessing when an employee accommodation is necessary, which is important because generally, unless a disability is obvious (e.g., a wheelchair-bound employee's required task of reaching materials well over her head) an employer suggesting accommodation could be accused of "perceived as" disability discrimination.

The policy should also explain the employer's requirement for providing medical information, the expectation that the employee cooperate in all such requests, and the consequences of failing to cooperate. The employee, and the supporting physician, should also be required to identify the specific accommodation being sought in order to assist the employer's analysis, eliminate employer second guessing, and require the employee to identify a potential solution to allow job performance. While the institution seeks to understand the exact accommodation being requested by the employee, a good policy will also explain that only reasonable accommodations will be made after the employer and employee engage in the interactive process. In that way, the employee clearly understands that the employer's obligation is only to allow what is reasonable under the circumstances.

Disability accommodations are influenced by many factors including the nature of the disability, the employee's job, and the work environment. As a result, it is important to omit from an ADA Accommodation Policy any reference to the employer's treatment of specific accommodation requests. Recently, the EEOC opined that disability accommodation policies which too specifically address leaves of absence or telecommuting, for example, are improperly limited and unlawful. *See EEOC Informal Discussion Letter dated 2.25.14.* Thus, when drafting an ADA Accommodation Policy, focus on process, put employees on notice, and demonstrate the institution's commitment to providing reasonable accommodations and preventing disability discrimination in the workplace.

Location, Location, Location: The Property Underneath the Feet of Speakers Matters When Determining Whether A Public Institution Can Control Their Speech.

By Alexander (Sandy) R. Bilus

Benjamin Bloedorn is an itinerant preacher who travels from college campus to college campus, loudly proclaiming his evangelical message for hours on end to anyone within earshot. In March 2008 he arrived at Georgia Southern University and began preaching atop a grassy knoll next to the university's student center and adjacent to a pedestrian mall and rotunda.

It just so happened that the university had designated that grassy knoll as its "Free Speech Area." A university official soon approached Bloedorn and told him that before he could use the Free Speech Area, he needed to get a permit. Bloedorn rebuffed the official and resumed preaching. Twice more, Bloedorn was told by university officials that he needed to get a permit and twice more he refused. Finally, university security arrested him for trespassing.

Bloedorn sued the university, claiming that its permitting policy violated his right to free speech under the First Amendment. He also didn't like that the university refused to let him engage in discourse on campus anywhere other than on the grassy knoll, so he sued over that restriction as well.

Bloedorn filed a motion seeking a preliminary injunction to prevent the university from enforcing its speech regulations. Whether Bloedorn won or lost that motion came down to how the court classified the property on which he sought to stand and deliver his speech. The court had to apply what is known as the "public forum analysis:" Did the university intend to open its campus to public discourse? Depending on the answer, the university's speech regulations might or might not have violated the Constitution.

This article explains how courts use the public forum analysis to decide whether speech regulations are constitutional. Attorneys for public institutions of higher education should understand the contours of this analysis, for it will guide them in counseling their institutions when they want to restrict people from engaging in expressive activity on their campuses.

First Amendment Basics

The First Amendment provides that the government cannot abridge the freedom of speech. Citizens can bring civil rights lawsuits against the government when it attempts to restrict their speech. *See* 42 U.S.C. § 1983.

Public colleges and universities "are not enclaves immune from the sweep of the First Amendment" and do not have unbridled freedom to regulate expressive activity on their campuses. On the

other hand, the First Amendment does permit them to take certain steps to control who can speak or protest on campus and where, when, and how they can engage in such expressive activity.

To determine whether a government speech restriction violates the First Amendment, a court will apply different levels of scrutiny depending on various factors, including the type of speech that is being regulated (for instance, commercial speech versus political speech), the type of restriction (content- or viewpoint-based restrictions versus content-neutral restrictions of the "time, place and manner" of speech), and, if the restriction controls expressive activity on property owned by the government, the type of forum that the government is trying to regulate (as explained further below).

The more strict the level of scrutiny that is applied by a court, the more likely that the court will conclude that the speech restriction does not pass constitutional muster.

The Public Forum Analysis

When the government—including public institutions of higher education—wants to restrict speech that occurs on property owned by the government, a court will look at the nature of the property to determine the level of scrutiny to be applied to the speech restriction.

This public forum analysis focuses on the particular place where the government wants to regulate expressive activity. A court will decide whether the government intended to open that place for public discourse, by reviewing the government's policies and practices as well as the nature of the property and its compatibility with expressive activity.

Depending on how the property is classified, the court will apply a different level of scrutiny to determine whether the government's restrictions on expressive activity in that space violate the First Amendment.

Importantly, different places on a single college campus can be classified differently, depending on the school's intentions for each place and their historical use.

Traditional Public Forums

The first category of forum is known as the "traditional public forum," i.e., the government-owned spaces where, since "time out of mind," citizens have gathered and engaged in public discourse: public parks, streets, and sidewalks. Courts will apply the strictest form of scrutiny to content-based restrictions on speech in traditional public forums. Even content-neutral restrictions of the "time, place, and manner" of speech must be narrowly tailored to achieve a significant government interest and leave open amply alternative channels of communication.

Luckily for universities (and their lawyers), it is almost unheard of for school property to fall into this category of forum—on-campus parks, streets, and sidewalks do not qualify as traditional public forums. The streets and sidewalks that border a campus, however, typically will be considered traditional public forums.

Designated Public Forums

If a school intentionally has opened up a part of its campus for purposes of public discourse—without regard to the type of speaker or the subjects discussed—then a court will hold that the school has created a "designated public forum" for expressive activity.

In a designated public forum, content-based restrictions on speech must be necessary to serve a compelling interest and must be narrowly drawn to achieve that goal, and content-neutral restrictions must be narrowly tailored to serve a significant government interest and leave open ample alternative channels of communication. *See Perry Educ. Ass'n v. Perry Local Educators' Ass'n,* 460 U.S. 37, 45 (1983).

For instance, in *Bowman v. White*, 444 F.3d 967 (8th Cir. 2006), the United States Court of Appeals for the Eighth Circuit held that the "outdoor areas clearly within the boundaries of the campus" at the University of Arkansas were designated public forums because the university, through its own written "policies and procedures," had opened them to expressive activity and did not limit the use of the spaces to a particular type of speech or speaker.

The *Bowman* court then concluded that the university's requirements that a speaker apply for a permit and give three days' advance notice, and ban on using the space during final examination periods, were content-neutral and narrowly tailored to serve significant government interests in protecting the educational experience of its students and ensuring public safety. But, the court held, the university's cap of five eight-hour days of public speaking per individual per semester was not narrowly tailored to serve the interest of fostering a diversity of uses of university resources because it did not permit a speaker who had exceeded the cap to use the space even if the space would otherwise go unused.

Limited Public Forums

If a school only has permitted certain groups to use a piece of property for expressive purposes, or only has permitted the dis-

cussion of certain subjects in that place, then a court would likely conclude that the school has created a "limited public forum."

In such a forum, a school may impose restrictions on speech (whether content-based or content-neutral) as long as they are "reasonable and viewpoint neutral." *See Pleasant Grove City, Utah v. Summum,* 555 U.S. 460, 470 (2009).

Thus, for example, in *Hickok v. Orange Cnty. Comm. College*, 472 F. Supp. 2d 469 (S.D.N.Y. 2006), the court ruled against a Green Party activist who sued after campus security had removed him from a lecture hall because he had been speaking from the audience. The court held that "the lecture hall at the college was a limited public forum" and that the school could require that lectures avoid endorsing one political party over another because such a policy "does not discriminate against any speaker's view point to the advantage of another's view point," and that the policy reasonably sought " to promote discussion and illuminate ideas."

Nonpublic Forums

If a school has not opened a place to expressive activity, a court will likely decide that the place is a "nonpublic forum." A school can most freely restrict speech in a nonpublic forum "based on subject matter and speaker identity so long as the distinctions drawn are reasonable in light of the purpose served by the forum and are view point neutral." *Perry*, 460 U.S. at 49.

In *Bishop v. Aronov*, 926 F.2d 1066 (11th Cir. 1991), for instance, a professor at the University of Alabama had been referring to his own religious beliefs during class and had held an after-class meeting to deliver a religious lecture. The United States Court of Appeals for the Eleventh Circuit held that during instructional time the university's classrooms were nonpublic forums because they had been reserved for intended uses other than "indiscriminate use by the general public," and that the university could direct the professor to refrain from expression of religious viewpoints in the classroom.

Benjamin Bloedorn Strikes Out

The lawsuit brought by Benjamin Bloedorn against Georgia Southern University presents a good example of how a court applies the public forum analysis to determine whether a school's speech regulations are constitutional. *See Bloedorn v. Grube*, 631 F.3d 1218 (11th Cir. 2011).

In that case, the United States Court of Appeals for the Eleventh Circuit first decided that the campus sidewalks, pedestrian mall, and rotunda were a limited public forum. This was because that property was dedicated to education and learning, and the university had only intended to open these areas for use by the university community, not the general public. Thus, the court concluded, the university was permitted to ban Bloedorn from preaching in these areas.

The "Free Speech Area" on the grassy knoll, by contrast, qualified as a designated public forum because the university's policies and practices broadly allowed expressive conduct both by university-affiliated individuals and groups and non-sponsored outsiders alike. The university had not limited the property to use by a specific category of group or speaker, and it had not limited discussion to certain topics. Instead, the court concluded, the university had intentionally opened the space to the general public without any restrictions on content or identity of speakers.

The court then considered the university's permitting policy that applied to this designated public forum. The policy required outside, non-sponsored speakers to disclose their identity and contact information on their permit request form. The court held the disclosure requirement was narrowly tailored to maximize the university's interests in allocating access to scarce resources and in protecting the safety and security of its community, since it allowed the university to let an applicant know whether a permit was granted, discouraged criminal activity, and provided contact information in the event anyone was injured or any property was damaged.

The policy also required outside, non-sponsored speakers to obtain a permit at least 48 hours in advance. The court held that this requirement was reasonably calculated to achieve the university's purpose of maintaining safety and order on campus, since it enabled the university to prepare its safety personnel to receive the speaker and ensure that there are sufficient other safety officers to patrol the rest of the campus.

Finally, the policy limited outside, non-sponsored speakers to one and one-half hours of time on the grassy knoll no more than once a month. The court held that the time restriction was "not draconian," and that it helped the university allocate the use of its resources and promote the propagation of

a wide variety of viewpoints. Accordingly, the court denied Bloedorn's preliminary injunction motion.

Take-Away Points

Attorneys for public institutions of higher education should be aware of their schools' policies and practices for regulating expressive activity on campus. Policies and practices should carefully define different locations on campus as designated, limited, or non-public forums. Schools should recognize that regulations that are based on the content or viewpoint of speech are almost impossible to defend, so schools will need extraordinary reasons for imposing such restrictions. Even content-neutral time/place/manner restrictions should be narrowly drawn and justified by significant school interests. Finally, policies can treat members of the campus community — administrators, professors, and students — and their sponsored guests differently than outsiders who are not sponsored and invited to come and speak on campus.

Major Changes to Laws Protecting Minors: Pennsylvania as Bellwether for New Child Protection Legislation?

By Joshua W. B. Richards and Meghan J. Talbot

In the wake of several high-profile cases of child abuse, Pennsylvania's General Assembly has been on the vanguard of state legislatures' efforts to reduce the risk of harm to children. Since 2013, Pennsylvania's lawmakers have passed twenty-three new pieces of legislation relating to child protection. The reforms were the product of a task force on child protection aimed at restoring the public confidence in the ability of the state to effectively protect the victims of child abuse. Collectively, these changes represent what may be the most aggressive state effort affecting "minors on campus" to date – and other states may soon be following suit.

Most relevant for institutions of higher education, the new Pennsylvania laws include major changes to (1) background check requirements for both employees and volunteers, and (2) mandated reporting of child abuse. These new requirements present significant implementation challenges for Pennsylvania colleges and universities, and as other states take up similar pieces of legislation, institutions of higher education across the country should consider the Pennsylvania experience as a possible sign of things to come. This article is a high level summary of some of the most salient aspects of the new laws.

Background Checks

The most publicized aspect of Pennsylvania's changes to child protection laws is the new background check requirements imposed by Act 153. Under Act 153 as enacted, all individuals in Pennsylvania who either work or volunteer in a capacity where they have "direct contact" with children must now undergo certain background checks. Employees must provide state criminal history results, federal criminal history (which requires fingerprinting), and child abuse report screening. Volunteers need the same clearances (although long-term in-state volunteers are exempt from the fingerprinting requirement).

In terms of timing, applicants for paid employment must now present proof that they have applied for the clearances, and need the completed clearances within 90 days of beginning work. Applicants for volunteer positions will need completed clearances starting July 1, 2015 – and there is no provisional period for Pennsylvania residents. Per guidance from the Pennsylvania Department of Human Services, existing employees will be required to submit clearances by the end of 2015. Likewise, guidance suggests that **existing** volunteers must complete the background checks by July 1, 2016. Clearances must be renewed every 36 months.

Apart from the cost of processing the clearances (almost $50 per individual, payable by the applicant or the hiring institution), the major compliance challenge for institutions of higher education is figuring out who needs the background checks in the first place. "Direct contact with children" is currently defined as "[t]he care, supervision, guidance or control of children or routine interaction with children," which arguably includes almost anyone affiliated with a college or university.

Mandated Reporting

The package of child protection bills also included important changes to mandated reporting requirements. First, the new laws change the definition of "school" so as to now specifically include institutions of higher education. Second, the laws change which individuals are "mandated reporters" required to report child abuse both externally to state authorities and internally within their organizations. Now, all school employees (including those in higher education) who have direct contact with children must report child abuse. In addition, all attorneys who are affiliated with a school (including institutions of higher education), regardless of their level of contact with children, are also mandated reporters.

Third, the procedure for reporting abuse has changed. Mandated reporters must now "report out" by calling and making a written report to the state-run child abuse hotline. Then, mandated reporters employed by a school must report the abuse to the designated individual within the institution. Institutions, in turn, are tasked with ensuring that the report was made to the state, and that the institution cooperates with any subsequent state investigation into the abuse. This constitutes a dramatic shift from the old procedure, in which the mandated reporter would *first* report within the institution, which would then assume the responsibility of making the report to state officials.

Public Reaction and Institutional Response

In addition to the sweeping changes described above, the new laws changed the definition of child abuse, provided protocols for training, and updated both immunities for compliance with the law and penalties for failure to comply. Unsurprisingly, the public's reactions to the legislature's efforts have been mixed. While few would argue that child protection is not a worthy goal, the loudest criticisms of the laws are that they are overbroad and difficult to implement.

In the higher education context, the language of the new laws present special challenges. For example, many (if not all) colleges and universities enroll seventeen-year-olds as first-year students; these students are considered "children" for purposes of the statute. At the same time, the law contemplates teenagers fourteen years of age and over receiving background checks if they are employed where they will have contact with "children" (again, meaning anyone under eighteen). It is doubtful that the legislature intended these incongruous results; nevertheless, these challenges are now the reality for colleges and universities implementing these laws.

Directions for the Future

In Pennsylvania, it is likely that the new child protection laws are here to stay. While there are some efforts underway to refine the laws (for example, reducing both the scope of individuals who need background checks and the burden of obtaining clearances), many people will still be subject to mandated reporting and background check requirements. Moreover, at the time of this writing, there is proposed legislation which would expand the reach of these laws; for example, expanding the definition of what constitutes "child abuse" for purposes of mandated reporting.

It is without question that the new Pennsylvania laws are the direct result of the child abuse perpetrated by Gerald Sandusky and other child predators within the state. Likewise, child protection laws in other states have often been the result of specific reactions to local child abuse scandals. However, as state lawmakers become aware of the requirements other jurisdictions have implemented, it is likely that legislatures will continue to strengthen their own states' protections of minors. To do so, they will borrow ideas from across state lines – and legislative overhauls in this area have not been limited to Pennsylvania. Connecticut recently added higher education employees to the ranks of mandated reporters. New Jersey and Delaware now require that all people make a report to authorities when they have a reasonable belief that child abuse has occurred.

Finally, these types of laws may also have an effect on the standard of care advocated by plaintiffs in civil litigation, regardless of the actual law in your jurisdiction. Institutions of higher education should be aware of the challenges of compliance with these new child protection laws, and should keep apprised of developments in their home states and beyond.

If you have any questions about this article or compliance with your state's child protection laws, please contact the authors, who would be pleased to assist you.

Hidden Risks? What Liability May Private Colleges and Universities Have for Their Student Newspapers and Publications?

By Robert C. Clothier

It is well-settled that *public* institutions are generally not liable for statements made by their student publications because the First Amendment prohibits them from exercising control over such publications. *See, e.g., Lewis v. St. Cloud State Univ.*, 693 N.W.2d 466 (Minn. App. 2005). So for public universities, the most prudent, and least risky, strategy requires a hands-off policy with respect to student publications.

But what about private institutions? They are not so immunized by the First Amendment; so are they liable for whatever their student publications do and say? Or, like public institutions, can they, too, avoid liability by leaving their student publications alone?

Under the current state of the law, a private institution may be held vicariously liable *even if the institution exercises no actual control over student publications.* This article will analyze the relevant factors for vicarious liability and then give practical tips on what a private college or university can do to minimize its legal liability for student publications.

I. Vicarious Liability at Private Colleges and Universities

The central issue under vicarious liability is whether a private institution retains the *power* to control the student publication. That means that the mere right to make decisions, even if that right is never exercised, may alone create liability. *Mazart v. State of New York*, 441 N.Y.S.2d 600, 601-02 (N.Y.Ct.Cl. 1981) ("Control need not apply to every detail of [the publication's] conduct and can be found where there is merely a right held by the [institution] to make management and policy decisions affecting the [publication].")

To analyze an institution's power to control a particular student publication, courts often consider the following non-exhaustive factors:

- Is the student publication the institution's "official" publication? Does the institution acknowledge its existence on campus?
- Does the institution recognize the student publication as a student activity? Does the institution give course credits for involvement in the publication?
- Did the institution exercise any editorial control? Has it, to the contrary, disavowed any editorial control and left that solely in the hands of students?
- Is the publication independently incorporated, giving it a separate legal existence?
- Was funding provided by the institution? Direct subsidy? Student activity fee?

Courts also consider (a) whether the institution provides assistance to the publication, such as office space, utilities, computers, supplies, technical assistance, support services, compensation for student/journalists, reimbursement of student/journalists' out-of-pocket costs, media/faculty advisor paid by the university; (b) whether there are separate accounting/financial books for the publication; (c) whether the institution approves, or enters into, contracts for the publication; (d) whether the institution offers any training to student/journalists; (e) whether the institution helps distribute the publication; and (f) whether the institution benefits from the publication, *i.e.*, does it play a role publicizing university news and events? Although there are relatively few cases illustrating how these factors play out, *compare Wallace v. Weiss*, 372 N.Y.S.2d 416 (N.Y.Sup.Ct. 1975) (finding vicarious liability) with *Gallo v. Princeton University*, 656 A.2d 1267 (N.J. Super. 1995) (no vicarious liability).

II. Difficult Options for Private Colleges and Universities

The dearth of available on-point cases presents a private institution with a difficult choice. Either exert greater control over student publications to reduce the likelihood of actionable conduct or take a complete hands-off approach, hoping a court someday will reject vicarious liability. There is no easy answer.

The primary risk of exerting greater control is, of course, that it makes vicarious liability much more likely, while it, at the same time, lowers the chances of actionable conduct. The price is some heavy lifting, as the institution would need to do what a normal publisher of content must do, *e.g.*: adopt policies and procedures designed to prevent and correct foreseeable misconduct associated with the student newspaper; provide regular libel and intellectual property training to reporters and editors; review and edit potentially actionable articles prior to publication; and purchase libel insurance. A private institution, however, may not want to bear the additional time and expense associated with these steps, and/or it may find such measures incompatible with the speech or press freedoms the institution has traditionally given its students.

A private institution could take the opposite tack and distance itself from student publications in a variety of ways, thereby making vicarious liability less likely:

- Creating an independent legal corporation for student publications.
- Placing a disclaimer emphasizing the student publication's separate operation from the institution and stating that any and all views expressed are not that of the institution.
- Approving a written institution policy (i) affirming the student publication's complete independence, (ii) stating that the student publication is not the institution's "official" publication, and (iii) disclaiming any right or authority to control or influence editorial decisions.
- Separating student publications from any student course offering at the institution.
- Minimizing, if not eliminating, any financial support to student publications.
- Administering the publication's funds separately from the institution in a separate bank account and the maintenance of separate books.
- Requiring student publications to cease using any of the institution's marks.
- Ensuring, to the extent possible, that any contracts for the student publication's benefit are signed by the publication and not the institution.
- Disconnecting, to the extent possible, student publications from any operational assistance or coordination (*e.g.*, computers, technical assistance, printing and delivery).
- Leaving it to the student publications to obtain libel insurance.

Implementing such measures bolster the institution's position that it lacks both actual control as well as the power to control the publication. How many of these steps – indeed, whether all of these steps – are necessary to eliminate vicarious liability is not clear from the cases.

The right answer depends on your institution's culture and risk profile. Regardless of approach, many of these measures may be difficult to implement or even be inconsistent with the institution's mission or accepted way of doing things. And neither approach eliminates risk, especially considering the paucity of case law and somewhat inconsistent results.

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