



VIRGINIA LAW WEEKLY

2017, 2018, & 2019 ABA Law Student Division Best Newspaper Award-Winner

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Lambda Celebrates 40th Anniversary with a Gay-la for the Ages

Brent Rice '25
Staff Editor

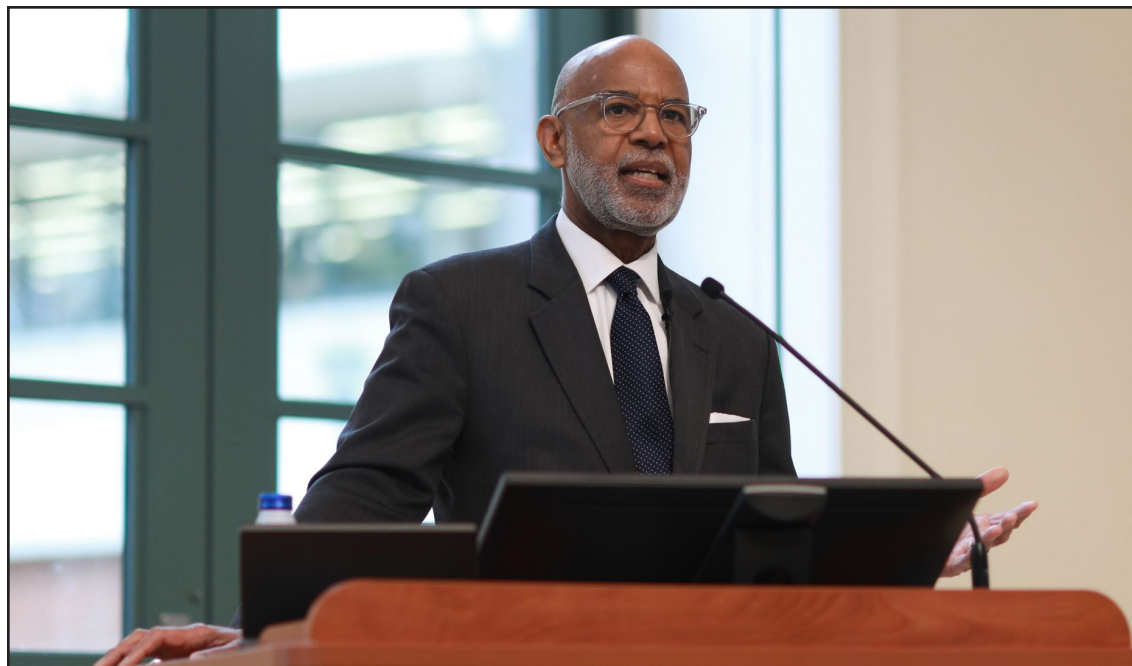
This past Friday, Lambda Law Alliance proved that Feb Club isn't the only time they know how to throw a good party. Over 210 students, faculty, staff, alumni, and friends of the Law School's second-largest affinity organization gathered at the Kimpton The Forum Hotel for a night of merriment and celebration as the club rang in its 40th year of existence and paid tribute to three persons who have had an outsized impact on the LGBTQ+ community both locally and nationwide.

The night began with a reflection on Lambda's humble beginnings, founded in 1984 as the Gay and Lesbian Law Students Association and comprised just enough students to fill a dining room table. By spring 1997, GALLSA had grown to 15 members and changed its name to BGALLSA to include bisexual students. Later, somewhere around 2001, the organization changed its name to Lambda's in an effort to avoid forcing its members into defining themselves with labels of their sexuality. Today, Lambda's membership consists of more than 130 self-identifying queer students.

In her introductory remarks, Dean Risa Goluboff took the time to reflect on the aforementioned growth of the club and also to share a staggering statistic about the current 1L class—that is, nearly 20% of them self-identify as queer. Goluboff closed her remarks by extending to Lambda's an official welcome to middle-age and wishes for many more successful years to come.

LAMBDA page 2

Judge Roger Gregory Receives Jefferson Foundation Medal in Law



Andrew Allard '25
Editor-in-Chief

*Pictured: Judge Gregory
Photo Credit: UVA Law*

In a profound moment of humility and gratitude, Judge Roger L. Gregory of the Fourth Circuit Court of Appeals accepted the Thomas Jefferson Foundation Medal in Law last Thursday. The medal—previous recipients of which include Supreme Court Justices Stephen Breyer and Sonia Sotomayor, as well as Robert Mueller '73 and Loretta Lynch—recognizes Judge Gregory's remarkable journey of public service, beginning here in the Commonwealth of Virginia.

"When I received the letter saying that I would be the recipient of this incredible medal, I was glad that I was on level ground because I was about to faint," said Judge Gregory. Judge Gregory noted that it was especially an honor to be at "Mr. Jefferson's school." Praising the Law School for its contributions to legal scholarship, Judge Gregory noted that he and Dean Goluboff first met at a panel on constitutional law. "She's a working dean . . . She was waxing eloquently on constitutional law. I was taking notes." Judge Gregory also noted that, thanks to his three daughters, "I didn't go to the University of Virginia, but a lot of my money did."

The story of Judge Greg-

ory's ascent to the bench is etched with the indelible marks of history. He was raised in Petersburg, Virginia, where he attended a segregated public high school until the 11th grade. He later attended nearby Virginia State University as a first-generation college student, where he graduated summa cum laude. Judge Gregory then attended law school, receiving his J.D. in 1978 from the University of Michigan Law School, for which, said Dean Goluboff, "we forgive him."

Judge Gregory went on to work in private practice and eventually established his own firm with Lawrence Douglas Wilder in 1982. He was then nominated to the Fourth Circuit Court of Appeals by two presidents—first by President Bill Clinton in a recess appointment, and later by President George W. Bush after the first appointment expired. Clearing the Senate with a near-unanimous vote, Judge Gregory became the first Black judge to serve on the Fourth Circuit, and he remains the only judge appointed to a federal appellate court by presidents from both major parties.

From 2016 to 2023, Judge Gregory served as Chief Judge of the Fourth

Circuit. During his tenure as Chief Judge, Gregory wrote the majority opinion in *International Refugee Assistance Project v. Trump*,¹ upholding an injunction against President Trump's travel ban that restricted admission of refugees from seven majority Muslim countries. Judge Gregory also highlighted two death penalty cases that the Court reviewed, ultimately resulting in a reduced life sentence for one defendant and exoneration based on actual innocence for the other. "After seventeen years on death row, he was released . . . All cases are important, but those ones stand out," Judge Gregory said.

Reflecting on the honor bestowed upon him, Judge Gregory evoked the intertwined threads of history and memory. Situated in the former capital of the Confederacy, Judge Gregory's chambers in the Lewis F. Powell, Jr. U.S. Courthouse are a poignant symbol of change juxtaposed against the grim echoes of history. Judge Gregory noted that from his window, he can see Thomas Jefferson's state

house and a statue of Barba-

1 883 F. 3d 233 (4th Cir. 2018).

JUDGE page 6

around north grounds



Thumbs sideways to all the UVA 4/20 events. ANG is pro legalization but anti-public intoxication.



Thumbs up to box wine. ANG loves affordable intoxication, and best of all, the Costco boxes fit perfectly in ANG's Law School locker.



Thumbs sideways to Tax Day. ANG hates filing a return every year, but ANG is hoping the IRS will just stop asking once they realize ANG's returns have all been fraudulent. That's how that works, right?



Thumbs up to Trump falling asleep at his trial. ANG often falls asleep during ANG's trial advocacy class and is happy to have the former President as a role model.



Thumbs up to Clarence Thomas skipping oral arguments. ANG also skipped ANG's oral argument and is happy to have Justice Thomas as a role model.



Thumbs down to the pollen + wind combo. ANG does not like tree semen to the face.



Thumbs up to Mock Trial arguments this week. ANG loves watching confused 1Ls think 2Ls and 3Ls are also doing LRW Oral Arguments.



Thumbs up to US News and World Report ranking UVA Law fourth in the nation. ANG would cash in on that lay prestige if ANG ever planned on graduating.



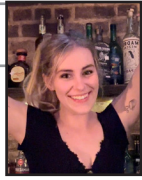
Thumbs down to 3@3 at Ellie's. ANG would like to pre-apologize for ANG's actions later this month.



Thumbs sideways to O.J. Simpson. On the one hand, O.J. epitomizes how fame and wealth protects powerful, misogynistic men. On the other, he averaged 143 rushing yards per game.

"Imminent Domain" and the Rat King

Nicky Demitry '26
Production Editor



In a stunning turn of events, local developer Wyatt Güy (it's German) has declared his intention to exercise a lesser-known legal maneuver known as "imminent domain" in order to seize control of the long-abandoned Dewberry building in downtown C'ville.

While most citizens are familiar with the concept of eminent domain, where the government can acquire private property for public use, imminent domain flips this attribute of political sovereignty on its head. In this case, it is the citizen(s) who are eager to acquire the government's property, or at least hold it hostage until



Pictured: Victims of Rat King
Photo Credit: Nicky Demitry

something is done about it.¹ Güy, known for his bold real estate ventures and penchant for controversy, has vowed to "rescue" the Dewberry building from its roughly 15-year slumber. However, his plan involves a hefty price tag for the city – a sum that many speculate could rival the GDP of a small country.

"It's simple economics," Güy explained with a smirk. "The City has neglected this

1 This doctrine has most notably been used in defense of the "insurrectionists" that "stormed the Capitol Building." Their counsel, an "attorney" who has "not yet passed the bar," went on record to say, "This bold new legal strategy asserts that these Patriots were merely exercising their right to 'imminent domain.' We all know imminent domain is an inherent attribute of political sovereignty. My clients are aware that imminent domain mandates that the property seized be utilized for "public good," and maintain their seizure of a table from the Lower West Terrace of the Capitol Building was indeed for public good. As in, members of the 'public' put it to 'good' use by reimagining it as a battering ram against the police."

prime real estate for far too long. Now, they'll have to pay the price – quite literally."

The Dewberry building, also called the "rotting heart of Charlottesville,"² "the Parthenon of C'ville," and "the lair of Ushegrim the Plaguebringer and His Rat Horde," has become a notorious eyesore for over a decade. Its hulking metal frame serves as a grim reminder of bureaucratic inertia, also sometimes called "70k a year in property taxes to the city."³

"It's about time someone took matters into their own hands," remarked local resi-

2 "They who dream by day are cognizant of many things which escape those who dream only by night...Have we not a perpetual inclination, in the teeth of our best judgment, to violate that which is Law, merely because we understand it to be such?...it is the beating of his hideous heart!" -MontrealBagelFan on Reddit, obviously referencing Poe.

3 The city says the developer paid \$71,902.08 in 2022, and \$70,693.26 in 2021. See 29 News, *The Dewberry stands empty, and it's silence from the developers.*



Pictured: Rat King asserts adverse possession of Dewberry Building
Photo Credit: Nicky Demitry

dent Sheila Thompson. "If the city won't do anything about it, why not let someone else have a go? Like the rats? They need a place to live too. When does adverse possession kick in?"

But not everyone is amused by Güy's audacious scheme. City officials have called his bluff, insisting that they have no intention of relinquishing control of the Dewberry building – at least not without a fight.

"The Doctrine of Imminent Domain does not apply when we refuse to acknowledge or take actual possession of the property," argued Vice Mayor Prian Binkston. "The Dewberry still technically belongs to John Dewberry, who pays us to keep this rat party going. And

more importantly, do you wish to anger the rats? Have you looked upon the face of the Rat-King? Have you ever felt real fear?"

Meanwhile, Güy remains undeterred, confident that he holds all the cards in this high-stakes game of rat real estate roulette. "Imminent domain, eminent domain – call it what you will," Güy quipped. "But at the end of the day, it's all about who's got the deepest pockets—NOT the biggest or most mutant rats, trust me on that."

As the battle for control of the Hellsmouth Dewberry building heats up, one thing is certain: we cannot—cannot—anger the rats.

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LAMBDA

continued from page 1

Next, Jennifer Hulvey, the former director of financial aid at the Law School and current senior advisor to the same office, took the stage to share a few touching interactions she has had with students over the years alongside some additionally exciting statistics about the University's Queer Alumni Network (QVA), which has provided over \$350,000 in scholarships to LGBTQ+ students over the years. Hulvey, a past recipient of the Alvarez-Coughlin award which seeks to honor those who have made "extraordinary efforts on behalf of the LGBTQ+ community by creating an open, supportive, and welcoming environment for diversity at the Law School, the University as a whole and beyond," helped transition the evening to the presentation of the award to three very worthy attendees in the audience.

Scott Migliori '12, the 2020-21 honoree whose acceptance of the award had been delayed due to Covid, was the first person of the evening to be presented the award. Migliori was the first openly transgender student at the Law School. Despite expressing great pride over

the growth of the LGBTQ+ community at UVA Law, Migliori, who is currently considering leaving Florida over concerns for his family's safety, reminded the room that there is still important work to be done.

Luis Alvarez, Jr. '88, President and CEO of the Law School Foundation and one of the namesakes of the award, introduced the next recipient, Susan Baker-Manning '98. Baker-Manning, who worked in Big Law after graduating from UVA, talked about finding ways to make an impact and serve your communities no matter your role. As a Partner at Morgan Lewis, she led large impact litigation matters, including representing some of the largest businesses in the country in an amicus brief to the US Supreme Court in *Obergefell v. Hodges*. Baker-Manning currently serves as the General Counsel of Planned Parenthood Federation of America.

Next, the award's other namesake and long-time Lambda advisor, Professor Anne Coughlin, introduced the evening's final recipient of the Alvarez-Coughlin award, Cordel Faulk '01. Faulk served UVA Law from 2009 to 2020, first as Director of Admissions and later

as Assistant Dean and Chief Admissions Officer. Many of the evening's speakers took the time to address special thanks to Faulk and testified that the growth of Lambda that we had gathered to celebrate was the direct result of Faulk's work to make UVA Law a more welcoming and inclusive place.

To close out the evening, world renowned drag queen Jackie Cox took the stage and serenaded the crowd before inviting the audience to join her on the dance floor.

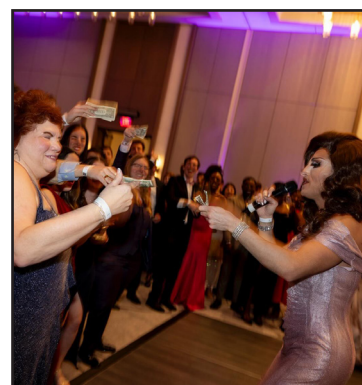
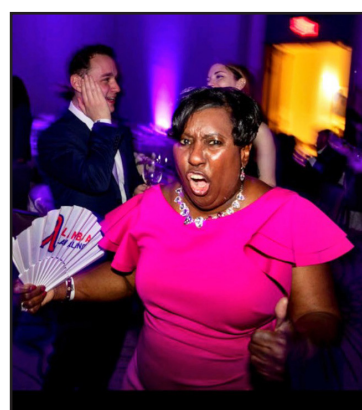


Photo Credit: Lambda Law Alliance & Reilly Swennes '25

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Write Now, or Forever Hold Your Peace

Monica Sandu '24
Production Editor
Emerita



Two weeks ago, I invoked 3L privilege to avoid being assigned an article by Editor-in-Chief Andrew Allard '25, in what can only be described as a *Law Weekly* cold call. However, rather than feeling relieved to avoid an additional responsibility for the week, I was struck by a profound sense of bittersweet melancholy, an almost nostalgic yearning for a time not yet gone. “I’m a 3L,” I realized. “I’m graduating in May. This is my last chance to write for the *Law Weekly*.” But what was I to write about?

My first thought was something to do with graduation regalia, why we wear it in the first place, what its colors mean, and so on. In fact, I had even come up with a glorious title: “Pomp and Circumstance: A History of Law School Regalia.” But did I really want my last hurrah to be a well-cited summary of Wikipedia?¹

¹ In case you are curious, here you go: Academic dress in the United States, Wikipedia (last accessed Apr. 2, 2024). See also <https://www.academapparel.com/caps/Academic-Hood-Development.html>.



“No,” I thought, “I want to make something special.” So, I thought I’d share with you all my *Law Weekly* journey and explain just how much this paper has come to mean to me.

Perhaps the most striking thing to me about my time on the *Law Weekly* is how close it came to never happening at all. I was but a wide-eyed 1L wandering the wilds of Spies Garden²

demicapparel.com/caps/Academic-Hood-Development.html.

² Back when I was still

during the Fall Activity Fair. It was there that I naïvely signed up for as many mailing lists as I thought sounded interesting.³ But one table in particular drew me in. A table surrounded by surprisingly athletic and energetic students in too-short gym shorts who were extremely eager to talk to me as soon as I glanced their way. The first person I spoke with from the *Law Weekly* was then-Ed-

pronouncing it to rhyme with “eyes.”

³ Some of these lists still send me emails to this day.

itor-in-Chief Phil Tonseth '22, whose promises of pizza and light copy-editing had me intrigued. More than anything, however, I was eager to meet new people and to join a social group on Grounds. Even though I was only two and a half hours away from my hometown, it may as well have been on the other side of the world for how out of my depth I felt those first few weeks—and I was grateful for any sort of guidance my 2L and 3L elders could give me. And so, although I’d never worked on a newspaper before, I attended that Monday’s *Law Weekly* meeting. Although I still felt like some stranger who had barged in on a group of friends, my worries were eased by the presence of other Section A 1Ls, including future Editor-in-Chief Nikolai Morse '24. Using gel pens, we got to work manually checking printed out articles for spelling errors, bolstered by fresh Dominos. The meeting ended around 6:00 pm that evening, and I walked away from it a mixture of disappointed and anxious. “It’s such a huge time commitment,” I thought. “If I join, I’m scared I’ll fail 1L.” At that

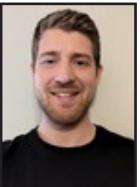
moment, I decided that the *Law Weekly* wasn’t for me.

But something got me to come back the next week. At some point in my discussion with other editors, I learned that the *Law Weekly* no longer had a cartoonist. I’d always loved to draw, and I figured that drawing something every week wouldn’t take nearly as much time as writing a full article. I came up with a cartoon entitled “Spies Garden,” featuring spy figures in trench coats and dark sunglasses popping out of flowers. I attended the meeting that week to submit my cartoon. And then I attended the next week. And the week after that. The first event I ever wrote about was a panel of lawyers who spoke to 1Ls about what a career in government would look like. I had brought my laptop and was taking copious notes, making sure not to miss a thing. There was a sense of pride in being there as a journalist, in getting the scoop on events at the Law School. All I was missing was my press badge.

WRITE page 6

Perspectives on Stablecoins

Noah Coco '26
Managing Editor



On Tuesday, April 9, Law, Information, Security, and Technology (LIST) hosted practitioners at the forefront of stablecoins for their event titled “Women in the Digital Assets Industry: Different Perspectives on Stablecoins.” The practitioners each discussed their experiences at the financial, legal, and regulatory frontier of this burgeoning technology and industry.

Professor Julia Mahoney, who is currently teaching a Monetary Constitution class, kicked off the discussion with a broad introduction and survey of stablecoins, which are cryptocurrencies whose values are pegged to some external reference point. The most common of these external reference points are other fiat currencies – currencies backed by the government that issued them rather than a physical commodity like gold or silver¹—but stablecoins may also be pegged to commodi-

¹ <https://www.investopedia.com/terms/f/fiatmoney.asp>.

ties, and others maintain their value through algorithmic formulae.

According to Professor Mahoney, what sets stablecoins apart from other cryptocurrencies is their greater potential to serve as a medium of exchange. As the name suggests, many stablecoins are reliably pegged to their external reference points and effectively eliminate the wild price fluctuations that have so far been endemic to cryptocurrencies more broadly. Price stability is achieved by maintaining sufficient reserve assets backing the stablecoins, which are often overcollateralized to protect against fluctuations in the prices of the underlying reserve assets. As price-stable mediums of exchange, stablecoins can circumvent the “iron grip” of sovereigns by providing an alternative financial infrastructure beyond national financial regulators and private financial intermediaries.

On the other hand, stablecoins do not come without skeptics. Mahoney cited academics and regulators alike who have expressed concern over the adoption



Pictured: Flavia Naves, Meagan Griffin '13, Lisa Schroer, & Professor Mahoney
Photo Credit: UVA Law

of this innovative yet still nascent technology. One common criticism is that stablecoins are recreating the Civil War-era phenomenon of widespread circulation of private bank notes. In this modern context, however, the “banks” issuing the stablecoins are so far unregulated and prone to destabilizing bank runs that could provoke government intervention. Federal regulators like Gary Gensler, Commissioner of the Securities and Exchange Commission, share similar sentiments and have so far taken aggressive stances against the industry.

The remaining practitioners proceeded by reflecting on their own roles amidst the financial innovation and

accompanying regulatory uncertainty surrounding stablecoins.

Lisa Schroer, Senior Director & Analytical Manager, Cross Analytic Practice Expertise Team at S&P Global Ratings, began by discussing these trends from a private ratings perspective. Lisa, a self-proclaimed “unlikely DeFi’er” who started her career at the Federal Reserve before transitioning to her current employer, says, as she sees it, the primary goal of rating agencies is providing transparency and minimizing asymmetric information for financial assets. With respect to stablecoins, she has been assessing the ability of stablecoins to maintain their pegs by examining the assets back-

ing them. Quality of reserve assets, asset liquidity, and overcollateralization are key features she looks at in determining whether stablecoins can reliably keep their pegs. This analysis is difficult when stablecoin issuers keep relatively less transparent records,² or when stablecoins are backed by assets of less stable value, like other cryptocurrencies.

Flavia Naves, Commissioner of the Wyoming Stable Coin Commission and Of Counsel at Hathaway & Kunz, LLP, next spoke about stablecoins from the state regulatory perspective. Naves noted that stablecoins are still “wizardry” to regulators, who know very little about the technology and are equipped with an outdated toolset of old laws to regulate the industry. Throughout the history of banking, regulators have constructed banking guardrails and internet guardrails as more transactions and payments began to occur online, but she says that the industry still lacks appropri-

² Like Tether, one of the most widely used stablecoins.

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LAW WEEKLY FEATURE: Court of Petty Appeals

The Court of Petty Appeals is the highest appellate jurisdiction court at UVA Law. The Court has the power to review any and all decisions, conflicts, and disputes that arise involving, either directly, indirectly, or tangentially, the Law School or its students. The Court comprises eight associate justices and one Chief Justice. Opinions shall be released periodically and only in the official court reporter: the Virginia Law Weekly. Please email a brief summary of any and all conflicts to editor@lawweekly.org

Blinded Law Students v. Board of Visitors of the University of Virginia
76 U.Va 22 (2024)

COLEMAN, J. delivers the opinion of the court. ALLEN, J. CONCURS. SANDU, J. CONCURS. ALLARD, C.J. DISSENTS.

Coleman, J., delivers the opinion of the Court.

While the Sun turned partially black on April 8th, its deadly photons still collided with the eyes of unsuspecting law students. They come before this Court asking for fair compensation. But the University makes two claims to avoid liability for injuries sustained on Grounds and made possible by the sun-exposed area that is Spies Garden. First, Virginia tort law should apply to this action. Second, the students were contributorily negligent by looking at the Sun without protective glasses. We reject both arguments and reinstate the plaintiffs' complaint. From now on, the Court of Petty Appeals follows a form of Better Law Theory with total disregard as to what the Commonwealth of Virginia does.

I

On the Day of Black Sun, students eagerly amassed in Spies Garden. The school encouraged this congregation by letting out some classes early, holding others outside, and even canceling a few. Initially, a pesky cloud covered the astronomical spectacle, but eventually gave way to reveal a

Sun whose area was approximately 70% covered. While some students marveled at the celestial bodies, others felt the wrath of Apollo—without eclipse glasses, they were permanently blinded. The students come from across the nation and have a variety of domiciles.

Three forces made this tragedy possible. First, students were let out of class. Second, the Student Af-

fairs office ran out of eclipse glasses early in the day. And third, the University has ignored the grave hazard that is Spies Garden.

II

The just cause of these plaintiffs is inhibited by two realities. First, Virginia tort law is a creature of some Victorian nightmare—contributory negligence is still a total defense to tort liability. Worse yet, the Commonwealth follows the First Restatement of Conflict of Laws! Second, and relatedly, *Klaxon* requires that federal courts follow the conflicts law of the state in which they sit.¹ We address both of these issues in one fell swoop.

III

This Court will not follow *Klaxon* and will only apply its own version of the Better

¹ *Klaxon Co. v. Stentor Elec. Mfg. Co.*, 313 U.S. 487 (1941).

Law Theory. *Klaxon* was decided on *Erie*-type concerns, but these are not issues for us. We have no concurrent jurisdiction with anyone. Parties are forcibly brought before this Court through our fictional setups. This means that there is no risk of unfairness to litigants based on the happenstance of diversity. Rather, we strive for universal unfairness.

IV

Refusing to follow *Klaxon* is only the first step. Now, we must formulate our conflict of laws doctrine. We choose as a foundation the much-maligned Better Law Theory, but simplify it to only include the final factor: application of the "better rule of law."² So, whenever we are confronted with a potential choice of law problem, we will consider which substantive law yields the better—or funnier—outcome. While some may decry this as arbitrary, this is absolutely the outcome most consistent with our precedent. See *Gay Section H Law Weekly Staff v. Lake*, 75 U. Va. 16

² Robert A. Leflar, *Conflicts Law: More on Choice-Influencing Considerations*, 54 Cal. L. Rev. 1584 (1966). I also thank Professor Collins, though I do so hesitatingly because I don't want him to reconsider my Conflicts grade after reading this.

(2023) (overruled on other grounds) (Lake, C.J., concurring) ("There is nothing more vital to the exercise of justice than committing to the bit."); see also Pet. R. Civ. Pro. 1 ("We do what we want.").

Applying that theory to this case, we choose to not apply Virginia tort law. It would be both better and funnier if the school were held liable for exposing students to the Sun's deadly rays. But rather

than apply another state's law based on the domiciles of the plaintiffs, this Justice feels empowered to create and apply his own Uniform Eclipse Law. The UEL will hold landowners negligent and liable for treble damages if they fail to provide invitees with eclipse glasses and also encourage them to go into open spaces.³

We reverse and remand for a consideration of the compensatory damages. When calculating lost wages, the lower court must assume that all who are blinded were going to make partner at their Big Law firms and not retire until age seventy-five.

³ To respond to my Brother Allen, this Justice overheard a successful law student express confusion over whether the Sun was in between Earth and Moon or vice versa. This is indicative of the astronomical knowledge of law students. So, we cannot say that it was obvious for the reasonable law student to not look directly at the Sun.

Allen, J., concurring in part and dissenting in part.

I do not foundationally contest the legitimacy of this Court's decision to craft its own tort law in response to the unique circumstances of the case at hand—my disagreement stems from their scant consideration of just how this new framework should operate. I would depart from my brethren and sistren on the bench in directing the lower court to find either that contributory negligence precludes recovery for the plaintiffs at bar or comparative negligence would require any damage award be severely curtailed. While law students are not the smartest bunch, even they must understand the risk and consequences of staring at the sun unaided by protective equipment. Though law students can (and do) trace any inconvenience or injury they suffer to the University administration in some way, these students are at least partially at fault, and should be limited in their recovery as a result.

Sandu, J., concurring in the judgment.


While I concur with the ultimate decision of this Court, I write separately to emphasize the role that the clouds present that day played in affecting law student decision-making. Although the day began as a partly-cloudy—even sunny—one, by 3:20 pm, the sky was nearly entirely covered in a thin blanket of clouds, nearly entirely

COPA page 5

Faculty Quotes

J. Mahoney: "Child lover Peckham, he must be a good neighbor."	F. Schauer: "Some of us have this overwhelming desire to punch someone in the face...this frequently occurs at meetings. You don't do it...but at least one reason you don't do it is because it's against the law."
N. Cahn: "We all wish we were Merlin, but we're not."	J. Harrison: "The good news is the fire hose is full of law."
J. Harrison: "Georgia is heavily armed."	R. Re: "You get a standard amount of money for every dog they shoot in the head."
C. Nicoletti: "I'd rather vote the bastards out. And I try."	F. Schauer: "I'm glad some of you had questions. It kills a little time."
D. Law: "Aw, we're gonna have to skip the drugs and sex."	M. Versteeg: "Which weird shit? Democracy?"

Heard a good professor quote? Email us at editor@lawweekly.org or submit to lawweekly.org/quotes



Virginia Law Weekly

COLOPHON

<p>Andrew Allard '25 Editor-in-Chief</p> <p>Garrett Coleman '25 Executive Editor</p> <p>Nicky Demitry '26 Production Editor</p>	<p>Nikolai Morse '24 Editor-in-Chief Emeritus</p> <p>Monica Sandu '24 Production Editor Emerita</p> <p>Ashanti Jones '26 Features Editor</p>	<p>Julia D'Rozario '24 New Media Editor</p> <p>Caitlin Flanagan '24 Staff Editor</p> <p>Ethan Brown '25 Satire Editor</p> <p>Mark Graff '26 Online Editor</p>
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COPA

continued from page 4 obscuring the eclipsing Sun from view. It was in this context that many law students, searching for a glimpse of a rare celestial phenomenon, chose to look directly at the Sun. Thus, I would argue that even if Virginia tort law were to apply, students should not be found contributorily negligent for injuries sustained during their reasonable reliance on the protection of clouds. If anything, I believe plaintiffs have a good case for promissory estoppel against Zeus and the Water Cycle for causing reasonable reliance on the promise of cloudy weather to the students' detriment.

Allard, C.J., dissenting.

My brother, Justice Coleman, has once again written a sound opinion and proven himself an able jurist. And yet, I cannot bring myself to join it for one simple yet crucial principle: I am a grumpy and overbearing bastard of a boss. Justice Coleman most-correctly applied this Court's bit-commitment legal philosophy to the novel conflict of laws issue in this case, and for that, another

jurist might commend him. But when I read the majority opinion I saw one thing and one thing only—an attempt to combine his *actual* legal studies with his writing for this Court. In response to this abhorrent behavior,⁴ I must dissent.

For too long, justices of this Court have grown too comfortable incorporating *real* law into their opinions.⁵ In doing so, they forget this Court's most fundamental principle: We do what we want.⁶ Whatever happened to the good old days of squishy, incomprehensible, and unpredictable doctrines, like substantive honor or original public meaning?⁷ If we are to uphold our duty as the decider of all the Law School's pet-

4 In which I have *never* dared to engage.

5 See, e.g., *Estate of Big Gobble the Turkey v. Commonwealth of Virginia*, 76 U.Va 11 (2023) (talking about things like "the Eighth Amendment," whatever the hell that is).

6 Petty Rules of Civil Procedure 1. Is it hypocritical to complain about citing real law and then refer to our FRCP-inspired procedural rules? No. See Rule 1.

7 Wait shit, one of those is real.

tiest disputes, then we must take great care not to make the law *too* comprehensible. Litigants before this Court cannot be led to believe that our decisions are well-reasoned, lest they become satisfied with the outcome, leading the wells of pettiness to quickly run dry.

For that reason, I would adopt Justice Coleman's same Better Law Theory—but on entirely different grounds which I refuse to disclose—and then maybe rule in favor of the Law School anyway just to shake things up a little. We are ungovernable. Amen.

STABLECOINS

continued from page 3 ate "blockchain guardrails" to deal with the newest financial innovations in crypto and stablecoins. Although the correct regulatory response is still debated, she notes that states have been more active in regulating the industry to date than the federal government. Her own Wyoming Stable Coin Commission is a product of recent state legislation establishing the Commission and empowering it to create what would be the United States' first government-issued stablecoin backed by

US dollar reserves.³ Meagan Griffin '13, Of Counsel in the Global Fin-tech & Payments Group at Paul Hastings LLP, further elaborated on state stablecoin regulatory schemes that she has encountered in her practice. She noted that states are the primary regulators for non-banking, non-depository institutions, the category that stablecoin issuers fall into. That regulatory structure complicates the stablecoin industry because the "interlocking web of state banking departments" lacks uniformity in their approach to cryptocurrencies broadly, and stablecoins in particular.

For instance, most regulations of cryptocurrency at the state level derive from money transmitter statutes, which have traditionally applied to the issuance of payment instruments, instruments of prepaid value, and

3 Castelluccio et al., Wyoming Adopts Stable Token Legislation and Lays the Foundation for a Government-Issued Stable Coin, Mayer Brown (May 5, 2023) <https://www.mayerbrown.com/en/insights/publications/2023/05/wyoming-adopts-stable-token-legislation-and-lays-the-foundation-for-a-government-issued-stablecoin>.

remits between two parties, but that are now being used to regulate cryptocurrency exchanges, even when they do not even touch fiat money. Some states have labeled stablecoins as cryptocurrencies, which under their respective state statutes excuses them from regulations governing underlying asset reserves (implicitly acknowledging that cryptocurrencies somehow hold intrinsic value). Other states label stablecoins as cryptocurrencies, but under their respective statutes they *do* regulate the underlying reserves. Still other states recognize stablecoins as a store of value, a category which also subjects them to regulations of the underlying reserves. The lack of uniformity makes compliance with state regulations difficult for stablecoin issuers, who often must engage counsel at earlier stages than other technology startups.

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Which Law School Class Are You, Based on your Zodiac Sign?

Julia D'Rozario '24
New Media Editor



W e l c o m e back to the Law School Astrology series. This week's *Law Weekly* will be the last edition of my 3L year, making this the third, and final, installment of the series. It's bittersweet—bitter, because I love writing these, and sweet, because I'll finally be able to stop looking over my shoulder for enraged, pitchfork-wielding Sagittarians.¹ With that said, keep reading for one last poorly researched, deeply biased take: Which Law School class are you, based on your zodiac sign?

Capricorn (December 22 – January 19)

Patent Law

Capricorns have an unfortunate reputation for being snobby and unapproach-

able. But the truth is, you're really not! People are intimidated by your intellect and don't take the time to get to know you and realize that you can actually be incredibly fun. For this reason, you are Patent Law. I'm in the class now, and the number of people who have told me that they "could never" is absurd. If you're reading this and have an interest in intellectual property, just go for it. I swear you don't need a tech background. Capricorn, you may feel like people just don't "get" you... and you'd be right. But I really like you anyway.

Aquarius (January 20 – February 18)

Torts

Aquarians are the human equivalent to those Torts fact-patterns they teach to 1Ls. Every once in a while, you'll encounter one that's borderline normal. But the other 99% of the time your immediate thought is just, "how in the ever-loving f*** did this happen?" How does a snail get into a ginger beer? Who takes a bunch of sheep on a boat and just lets them roam loose on board? Why would you ever get on The Flopper if you didn't

want to fracture your knees?

Pisces (February 19 – March 20)

Legal Aid Justice Center Clinics

Pisceans are widely considered to be the "empaths" of the zodiac. You are known for being tender-hearted and emotional; this, in turn, makes you sympathetic to the needs of the people around you. Like the various Legal Aid clinics, you are driven by your desire to help others.

Aries (March 21 – April 19)

Negotiation

You are fun, I'll give you that. But you're also entirely unhinged. You're essentially a permanent manifestation of the unscrupulous, shenanigan-prone negotiation goblin that emerges from the depths of the human psyche during an in-class Negotiation simulation exercise. And, like those Negotiation simulations, my memories of you trigger my fight-or-flight response.

Taurus (April 20 – May 20)

Seminar in Ethical Values

If you've ever taken a Seminar in Ethical Values,

and if you've ever met a Taurus, you know this comparison is a no-brainer. I've previously compared Tauruses to a fuzzy blanket or a sunny Spring afternoon—which is to say, laid-back, wholesome, peaceful. Seminars in Ethical Values have that exact same vibe. I like.

Gemini (May 21 – June 21)

Constitutional Law

Gemini, as a constellation, is known as "the Twins", and Geminis are recognized for their inherent duality. At your best, you are flexible, easy-going, and curious about the world around you. At your worst, however, you can be non-committal, inconsistent, and flaky. Like Constitutional Law.²

Cancer (June 22 – July 22)

Law and Literature

I quite literally recommend this class to everyone. It's fun, unique, and has made an immensely positive impact on my time in

2 To quote Nikolai Morse '24, the Chief Justice Emeritus of this fine paper, "Con law is Gemini. Two-sided, always changing, and contradictory. And also moody."

law school. There is also no other class in the law school where you will read something and then get asked, "how did that make you feel?" Like Law and Literature, I believe everyone needs an emotional-support Cancer to improve their law school experience and talk about their feelings with.

Leo (July 23 – August 22)

Advanced Verbal Persuasion

Leos are known for being charismatic, warm-hearted, and extremely confident—you're never afraid to take center stage. For this reason, you are Persuasion. I'm in the class now, and I love it. I can be very quiet,³ and I get nervous before giving a speech, but the class is so welcoming and gentle in nature that it's slowly pulling me out of my shell. Leo, like Persuasion, your confidence and welcoming nature inspire those around you—even if your extroversion makes us want to hide from you at first.

3 Yes, when I'm not running my mouth about astrology, I'm fairly quiet.

ASTROLOGY

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Virgo (August 23 – September 22)

Evidence

Firstly, I would be remiss if I didn't point out that both Virgos and Evidence are excessively fixated on rules and order... to the point that no one is having fun anymore. But also, If you've read the other installments of this series, you know that I have a long and troubled history of Virgo-related emotional anguish. Therefore, despite recognizing your many good qualities, I choose to actively avoid you. Just as I have avoided taking Evidence, despite being informed like twice a day that I'll need it for the Bar. . .⁴ Vir-Go away.

Libra (September 23 – October 22)

Fed Courts

I've written in the past about how Libras are the aesthetes of the zodiac—you are known for being a lover of art, philosophy and intellectualism. While this can manifest as external appre-

⁴ People keep telling me this. I would have had to learn it for the Bar even if I took the class. Rules have a way of flying out of my brain 0.2 seconds after the final.

WRITE

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Come spring elections, I knew that I wanted to get more involved in the paper, and so I, as a rising 2L, became a co-executive editor of the Law Weekly, shifting my role from a more writing (and cartooning) intensive one to a more editorial role. Nevertheless, during 2L, I would use my platform at the Law Weekly to write different articles I was passionate about, from how to start a student organization to a history of Romanian folk dancing and an in-depth review of Eurovision every year. I took pride every week when I saw my name printed in the colophon. Whenever I had an article published, I would take pictures of it and send it to my family group chat.⁴ And I never had to worry about cooking Monday night dinner.

By the time I was a rising 3L, I was full of ambition. Although I initially planned to run for Editor-in-Chief, it came up in my discussion with then-Editor-in-Chief Dana Lake '23 that I had taken a graphic design class in high school where I had actually learned InDesign.

⁴ I always grab multiple copies of the paper to give my family whenever I can.

ciation, it can also manifest as internal hyper-awareness... you're extremely concerned with how others perceive you and often find yourself doing things not because you want to, but because you think it will impress others. Like taking Fed Courts. I promise, you don't have to do this to yourself. No one else cares.

Scorpio (October 23 – November 21)

Repugnant Transactions

Scorpios are often known for their fascination with the weirder, more taboo sides of humanity. Your friend who watches *Vice Informer* videos in his free time? A Scorpio. Your friend with a *My Strange Addiction* addiction? Also a Scorpio. Your friend who took Repugnant Transactions, and now won't stop talking to you about blood and plasma sales, illicit organ markets, sex work, and drug legalization? You guessed it—a Scorpio.

Sagittarius (November 22 – December 21)

Civil Procedure

Why are you the way that you are?

In all seriousness, having been subject to my anti-Sagittarius bias in the last two

articles, you may be here searching for answers. Like Civil Procedure, you find yourself thinking, "am I really that bad? Or am I just complicated?" The truth is that you are both complicated and that bad.⁵

⁵ Last ever Sagittarius disclaimer: as I mentioned in parts one and two, I actually like you. Truth be told, several of my closest friends are Sagittarians. But I do also have exactly one mortal enemy, who is also a Sagittarius. And hell hath no fury like an astrology girl with a keyboard.



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Because of this experience, Dana suggested instead that I run for Production Editor. The rest is history.⁵ The new Law Weekly executive board, headed by Nikolai Morse '24 with current Editor-in-Chief Andrew Allard '25 (then Executive Editor) and me as Production Editor, got off to an (understandably) slow start as we tried to get our bearings. If I thought hanging around until 6:00pm was late, imagine my worries when, on that first evening, we didn't finish putting together the paper until nearly 10:00 pm. The old anxiety returned; what had I gotten myself into? But with every week, we became an increasingly better-oiled machine. At first we were done at 9:30 pm, then 9:00 pm, then 8:00 pm, and so on. Sometimes, we'd even finish before sunset if we were extra efficient (and when the time change was in our favor). I got to know InDesign's quirks, learned to laugh when it inevitably crashed (which it does at least once a meeting), and memorized all the tools and shortcuts I needed. And I got to do it all while surrounded by my

⁵ You'd be surprised how effective "graphic design is my passion" can be as a campaign slogan!

wonderful friends.⁶

Reflecting now on my legacy at the Law Weekly, it doesn't feel real that this is the last time I'll be writing an article as a student. Even after the elections and the installation of the new executive board, I've hung around to train our new Production Editor Nicky Demitry '26 and help out where I can. To think that in a few weeks I'll be leaving this all behind, I can't help but feel emotional. In the Law Weekly, I found an opportunity to explore events I never would have attended otherwise, an outlet for my creativity, and a family that is unparalleled here at UVA Law. Thank you, Law Weekly, for being one of the best things in law school. It's been an honor and a privilege to be here all three years. I'll always cherish my time with you.

⁶ And the occasional enemy

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JUDGE

continued from page 1
ra Johns, a civil rights activist who, as a high school student, helped to initiate one of the consolidated cases in *Brown v. Board of Education*.

Judge Gregory thus sits at a complex intersection of our nation's history—a history that has undoubtedly shaped his view of the Constitution. Judge Gregory noted that, since the beginning of the Republic, the question of who are "We the People" has perplexed legal thinkers. "People that looked like me would not be so if we were textualists or originalists," Judge Gregory said. Noting the importance of adhering to the Constitution, he continued, "The good thing about that is also the bad thing about that . . . Everybody has a different view of what that means."

But for Judge Gregory, the struggle over constitutional meaning is itself important. "Text without context is pretext," Judge Gregory said. "The Constitution must be interpreted with contextual sensitivity to changing circumstances so that it imposes reasonable requirements in such circumstances," he contin-

ued, citing Justice Joseph Story, who served on the Supreme Court alongside Chief Justice Marshall.

"Constitutionalism is a blessing because we adhere to the Constitution, but it can be a curse if we engage in distorted constitutionalism," Judge Gregory said, pointing to John C. Calhoun's constitutional defense of slavery and Chief Justice Taney's opinion in *Dred Scott*. "I love the Constitution . . . but there's nothing talismanic about these words unless they're in the heart."

Asked how his life has affected his jurisprudence, Judge Gregory recalled a friend who spent much of his adult life in prison due to substance abuse. Now recovered and out of prison, he helps guide others through prison and addiction. "From diabetes, he's now almost blind . . . and he said 'I've never seen clearer in my life than I see now today,'" Judge Gregory said, choking back tears. "That's how we've got to see the Constitution."

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