

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

BRUCE GILLEY,

Case No.: 6:22-cv-01181-AA

Plaintiff,

**STIPULATION**

v.

TOVA STABIN, in her individual capacity;  
and the COMMUNICATION MANAGER of  
the University of Oregon's Division of Equity  
and Inclusion, in his or her official capacity,

Defendants.

---

Bruce Gilley and the University of Oregon agree as follows:

1. On June 14, 2022, Professor Bruce Gilley re-posted and commented on a social media post by the Communication Manager for the Division of Equity and Inclusion. Professor Gilley commented "all men are created equal" in a re-tweet of @UOEQuity's racism interrupter

post. The Communication Manager thereafter blocked Professor Gilley from interacting with the Division's account. Professor Gilley remained blocked for approximately seven weeks.

2. The University of Oregon has previously said and now reiterates that blocking Professor Gilley was an isolated incident that should not have happened. His comment that "all men are created equal" is constitutionally protected speech and should not have been blocked. The University's General Counsel regrets that Professor Gilley was blocked.

3. After he was blocked, Professor Gilley made a public records request for the University's policies that govern social media moderation. An Assistant Vice President for the Division of Equity and Inclusion provided information in response to the public records request that incorrectly advised the Public Records Office that the University did not have social media moderation policies, and that incorrect information was provided to Professor Gilley. No University officials above the rank of the Assistant Vice President were made aware of the request or incorrect response. The University's General Counsel regrets that this incorrect information was provided.

4. Senior University officials above the rank of the Assistant Vice President were not made aware that Professor Gilley had been blocked until after he filed his lawsuit. Professor Gilley did not confer with the University before filing the lawsuit and motion for temporary restraining order.

5. As part of resolving this case, the University has agreed to clarify its social media guidelines, provide a means of challenging a blocking decision, and train staff.

On this 28th day of March, 2025,

*IT IS SO STIPULATED.*

For Plaintiff Bruce Gilley:

*s/ Endel Kolde*

---

ENDEL KOLDE (pro hac vice)  
dkolde@ifs.org  
Institute for Free Speech  
1150 Connecticut Ave., NW, Suite 801  
Washington, D.C. 20036

D. ANGUS LEE, OSB No. 213139  
angus@angusleelaw.com  
Angus Lee Law Firm, PLLC  
9105 NE Highway 99, Suite 200  
Vancouver, WA 98665-8974

For Defendant Communication Manager for  
the Division of Equity and Inclusion:

*s/ Misha Isaak*

---

MISHA ISAAK, Bar No. 086430  
misha.isaak@stoel.com  
J. ALEXANDER BISH, Bar No. 173060  
alexander.bish@stoel.com  
Stoel Rives LLP  
760 SW Ninth Ave, Suite 3000  
Portland, OR 97205