



10. Paragraph 10 is denied for lack of information upon which to form a belief.
11. Paragraph 11 is admitted.
12. Paragraph 12 is denied.
13. Paragraph 13 is denied.
14. Paragraph 14 is denied.
15. Paragraph 15 is denied.
16. Paragraph 16 is denied.
17. Paragraph 17 is denied.
18. Paragraph 18 is denied for lack of information upon which to form a belief.
19. Paragraph 19 is denied.
20. Paragraph 20 is denied.
21. Paragraph 21 is denied.
22. Paragraph 22 is denied.
23. Paragraph 23 is denied.
24. Paragraph 24 is admitted.
25. Paragraph 25 is admitted.
26. Paragraph 26 is admitted.
27. Paragraph 27 is admitted.
28. Paragraph 28 is admitted.
29. Paragraph 29 is admitted.
30. Paragraph 30 is admitted.
31. Paragraph 31 is denied.
32. Paragraph 32 is admitted.

33. Paragraph 33 is admitted.
34. Paragraph 34 is denied for lack of information upon which to form a belief.
35. Paragraph 35 is denied for lack of information upon which to form a belief.
36. Paragraph 36 is denied for lack of information upon which to form a belief.
37. Paragraph 37 is denied for lack of information upon which to form a belief.
38. Paragraph 38 is denied for lack of information upon which to form a belief.
39. Paragraph 39 is denied for lack of information upon which to form a belief.
40. Paragraph 40 is denied for lack of information upon which to form a belief.
41. Paragraph 41 is denied for lack of information upon which to form a belief.
42. Paragraph 42 is denied for lack of information upon which to form a belief.
43. Paragraph 43 is denied for lack of information upon which to form a belief.
44. Paragraph 44 is denied for lack of information upon which to form a belief.
45. Paragraph 45 is denied for lack of information upon which to form a belief.
46. Paragraph 46 is denied for lack of information upon which to form a belief.
47. Paragraph 47 is denied for lack of information upon which to form a belief.
48. Paragraph 48 is denied for lack of information upon which to form a belief.
49. Paragraph 49 is denied for lack of information upon which to form a belief.
50. Paragraph 50 is denied for lack of information upon which to form a belief.
51. Paragraph 51 is denied for lack of information upon which to form a belief.
52. Paragraph 52 is denied for lack of information upon which to form a belief.
53. Paragraph 53 is denied for lack of information upon which to form a belief.
54. Paragraph 54 is denied for lack of information upon which to form a belief.
55. Paragraph 55 is denied for lack of information upon which to form a belief.

56. Paragraph 56 is denied for lack of information upon which to form a belief.
57. Paragraph 57 is denied for lack of information upon which to form a belief.
58. Paragraph 58 is denied for lack of information upon which to form a belief.
59. Paragraph 59 is denied for lack of information upon which to form a belief.
60. Paragraph 60 is denied for lack of information upon which to form a belief.
61. Paragraph 61 is denied for lack of information upon which to form a belief.
62. Paragraph 62 is denied for lack of information upon which to form a belief.
63. Paragraph 63 is denied for lack of information upon which to form a belief.
64. Paragraph 64 is admitted.
65. Paragraph 65 is admitted.
66. Paragraph 66 is denied for lack of information upon which to form a belief.
67. Paragraph 67 is admitted.
68. Paragraph 68 is admitted.
69. Paragraph 69 is admitted.
70. Paragraph 70 is denied.
71. Paragraph 71 is admitted.
72. Paragraph 72 is admitted.
73. Paragraph 73 is admitted.
74. Paragraph 74 is admitted.
75. Paragraph 75 is admitted.
76. Paragraph 76 is admitted.
77. Paragraph 77 is admitted.
78. Paragraph 78 is admitted.

79. Paragraph 79 is denied.
80. Paragraph 80 is denied.
81. Paragraph 81 is admitted.
82. Paragraph 82 is admitted.
83. Paragraph 83 is denied.
84. Paragraph 84 is denied.
85. Paragraph 85 is admitted.
86. Paragraph 86 is denied.
87. Paragraph 87 is admitted.
88. Paragraph 88 is admitted.
89. Paragraph 89 is admitted.
90. Paragraph 90 is admitted.
91. Paragraph 91 is admitted.
92. Paragraph 92 is admitted.
93. Paragraphs 93a-l are admitted.
94. Paragraph 94 is admitted.
95. Paragraph 95 is admitted.
96. Paragraph 96 is denied.
97. Paragraph 97 is denied.
98. Paragraph 98 is denied for lack of information upon which to form a belief.
99. Paragraph 99 is denied.
100. Paragraph 100 is admitted.
101. Paragraph 101 is denied.

102. Paragraph 102 is denied.
103. Paragraph 103 is admitted.
104. Paragraph 104 is admitted.
105. Paragraph 105 is admitted.
106. Paragraph 106 is admitted.
107. Paragraph 107 is admitted.
108. Paragraph 108 is denied.
109. Paragraph 109 is denied.
110. Paragraph 110 is denied.
111. Paragraph 111 is admitted.
112. Paragraph 112 is admitted.
113. Paragraph 113 is admitted.
114. Paragraph 114 is admitted.
115. Paragraph 115 is admitted.
116. Paragraph 116 is denied.
117. Paragraph 117 is admitted.
118. Paragraph 118 is denied.
119. Paragraph 119 is admitted.
120. Paragraph 120 is denied.
121. Paragraph 121 is denied for lack of information upon which to form a belief.
122. Paragraph 122 is denied.
123. Paragraph 123 is admitted.
124. Paragraph 124 is admitted.

125. Paragraph 125 is admitted.
126. Paragraph 126 is denied.
127. Paragraph 127 is denied.
128. Paragraph 128 is admitted.
129. Paragraph 129 is denied.
130. Paragraph 130 is admitted.
131. Paragraph 131 is denied.
132. Paragraph 132 is denied.
133. Paragraph 133 is denied.
134. Paragraph 134 is denied.
135. Paragraph 135 is denied.
136. Paragraph 136 is admitted.
137. Paragraph 137 is admitted.
138. Paragraph 138 is admitted.
139. Paragraph 139 is admitted.
140. Paragraph 140 is admitted.
141. Paragraph 141 is denied.
142. Paragraph 142 is denied.
143. Paragraph 143 is admitted.
144. Paragraph 144 is admitted.
145. Paragraph 145 is admitted.
146. Paragraph 146 is admitted.
147. Paragraph 147 is denied.

148. Paragraph 148 is denied.

149. In response to Paragraph 149, the Defendants reincorporate their responses to paragraphs 1 through 148 of the Petition as though fully set forth herein.

150. Paragraph 150 is denied for lack of information upon which to form a belief.

151. Paragraph 151 is denied for lack of information upon which to form a belief.

152. Paragraph 152 is denied for lack of information upon which to form a belief.

153. Paragraph 153 is denied for lack of information upon which to form a belief.

154. Paragraph 154 is denied for lack of information upon which to form a belief.

155. Paragraph 155 is denied.

156. Paragraph 156 is denied.

157. In response to Paragraph 157, the Defendants reincorporate their responses to paragraphs 1 through 156 of the Petition as though fully set forth herein.

158. Paragraph 158 is denied.

159. Paragraph 159 is denied.

160. Paragraph 160 is denied for lack of information upon which to form a belief.

161. Paragraph 161 is denied for lack of information upon which to form a belief.

162. Paragraph 162 is denied for lack of information upon which to form a belief.

163. Paragraph 163 is denied for lack of information upon which to form a belief.

164. Paragraph 164 is denied.

165. Paragraph 165 is denied.

166. In response to Paragraph 166, the Defendants reincorporate their responses to paragraphs 1 through 165 of the Petition as though fully set forth herein.

167. Paragraph 167 is denied.

168. Paragraph 168 is denied.

169. Paragraph 169 is denied.

170. Paragraph 170 is denied.

171. Paragraph 171 is denied.

172. Paragraph 172 is denied.

173. Paragraph 173 is denied.

174. Paragraph 174 is denied.

175. Paragraph 175 is denied.

176. Paragraph 176 is denied.

177. Paragraph 177 is denied.

178. Paragraph 178 is denied.

179. In response to Paragraph 179, the Defendants reincorporate their responses to paragraphs 1 through 178 of the Petition as though fully set forth herein.

180. Paragraph 180 is denied.

181. Paragraph 181 is denied.

182. Paragraph 182 is admitted.

183. Paragraph 183 is denied.

184. Paragraph 184 is denied.

185. Paragraph 185 is denied.

186. Paragraph 186 is denied for lack of information upon which to form a belief.

187. Paragraph 187 is denied for lack of information upon which to form a belief.

188. Paragraph 188 is denied.

189. Paragraph 189 is denied.

190. Paragraph 190 is denied.

191. Paragraph 191 is denied.

192. Paragraph 192 is denied.

193. In response to Paragraph 193, the Defendants reincorporate their responses to paragraphs 1 through 1592 of the Petition as though fully set forth herein.

194. Paragraph 194 is admitted.

195. Paragraph 195 is denied.

196. Paragraph 196 is denied.

197. Paragraph 197 is denied.

198. Paragraph 198 is denied.

199. In response to Paragraph 199, the Defendants reincorporate their responses to paragraphs 1 through 198 of the Petition as though fully set forth herein.

200. Paragraph 200 is denied for lack of information upon which to form a belief.

201. Paragraph 201 is denied for lack of information upon which to form a belief.

202. Paragraph 202 is denied for lack of information upon which to form a belief.

203. Paragraph 203 is denied.

204. Paragraph 204 is denied.

205. Paragraph 205 is denied.

206. Paragraph 206 is denied.

207. In response to Paragraph 207, the Defendants reincorporate their responses to paragraphs 1 through 206 of the Petition as though fully set forth herein.

208. Paragraph 208 is denied.

209. Paragraph 209 is denied.

210. Paragraph 210 is denied.

211. Paragraph 211 is denied.

212. Paragraph 212 is denied.

213. In response to Paragraph 213, the Defendants reincorporate their responses to paragraphs 1 through 212 of the Petition as though fully set forth herein.

214. Paragraph 214 is denied.

215. Paragraph 215 is denied.

216. Paragraph 216 is denied.

217. Paragraph 217 is denied.

218. Paragraph 218 is denied.

219. Paragraph 219 is denied.

220. In response to Paragraph 220, the Defendants reincorporate their responses to paragraphs 1 through 219 of the Petition as though fully set forth herein.

221. Paragraph 221 is denied.

222. Paragraph 222 is denied.

223. Paragraph 223 is denied.

224. Paragraph 224 is denied.

225. In response to Paragraph 225, the Defendants reincorporate their responses to paragraphs 1 through 224 of the Petition as though fully set forth herein.

226. Paragraph 226 is admitted.

227. Paragraph 227 is denied.

228. Paragraph 228 is denied for lack of information upon which to form a belief.

229. Paragraph 229 is denied.

230. Paragraph 230 is denied.

231. In response to Paragraph 231, the Defendants reincorporate their responses to paragraphs 1 through 230 of the Petition as though fully set forth herein.

232. Paragraph 232 is admitted.

233. Paragraph 233 is denied.

234. Paragraph 234 is denied for lack of information upon which to form a belief.

235. Paragraph 235 is denied.

236. Paragraph 236 is denied.

237. In response to Paragraph 237, the Defendants reincorporate their responses to paragraphs 1 through 236 of the Petition as though fully set forth herein.

238. Paragraph 238 is admitted.

239. Paragraph 239 is admitted.

240. Paragraph 240 is denied.

241. Paragraph 241 is denied.

242. Paragraph 242 is denied.

243. Paragraph 243 is denied.

244. In response to Paragraph 244, the Defendants reincorporate their responses to paragraphs 1 through 143 of the Petition as though fully set forth herein.

245. Paragraph 245 is admitted.

246. Paragraph 246 is denied for lack of information upon which to form a belief.

247. Paragraph 247 is denied.

248. Paragraph 248 is denied.

249. Paragraph 249 is denied.

250. Paragraph 250 is denied.

251. In response to Paragraph 251, the Defendants reincorporate their responses to paragraphs 1 through 250 of the Petition as though fully set forth herein.

252. Paragraph 252 is admitted.

253. Paragraph 253 is denied.

254. Paragraph 254 is denied.

255. In response to Paragraph 255, the Defendants reincorporate their responses to paragraphs 1 through 254 of the Petition as though fully set forth herein.

256. Paragraph 256 is denied.

257. Paragraph 257 is denied.

258. Paragraph 258 is denied.

259. Paragraph 259 is denied.

260. In response to Paragraph 260, the Defendants reincorporate their responses to paragraphs 1 through 259 of the Petition as though fully set forth herein.

261. Paragraph 261 is denied.

262. Paragraph 262 is denied.

263. Paragraph 263 is denied.

264. Paragraph 264 is denied.

265. Paragraph 265 is denied.

266. In response to Paragraph 266, the Defendants reincorporate their responses to paragraphs 1 through 265 of the Petition as though fully set forth herein.

267. Paragraph 267 is denied.

268. Paragraph 268 is denied.

269. Paragraph 269 is denied.

270. Paragraph 270 is denied.

271. Paragraph 271 is denied.

272. Paragraph 272 is denied.

273. In response to Paragraph 273, the Defendants reincorporate their responses to paragraphs 1 through 272 of the Petition as though fully set forth herein.

274. Paragraph 274 is denied.

275. Paragraph 275 is denied.

276. Paragraph 276 is denied for lack of information upon which to form a belief.

277. Paragraph 277 is denied.

278. Paragraph 278 is denied.

279. Paragraph 279 is denied.

280. In response to Paragraph 280, the Defendants reincorporate their responses to paragraphs 1 through 279 of the Petition as though fully set forth herein.

281. Paragraph 281 is denied.

282. Paragraph 282 is denied.

283. Paragraph 283 is denied.

284. In response to Paragraph 284, the Defendants reincorporate their responses to paragraphs 1 through 283 of the Petition as though fully set forth herein.

285. Paragraph 285 is denied for lack of information upon which to form a belief.

286. Paragraph 286 is denied for lack of information upon which to form a belief.

287. Paragraph 287 is denied.

288. Paragraph 288 is denied.

289. Paragraph 289 is denied.

**AFFIRMATIVE DEFENSES**

1. Plaintiff fails to state a claim upon which relief may be granted.
2. Defendants acted within their discretion in matters of academic concern.
3. Plaintiff has failed to mitigate its damages.
4. Defendants deny that any unlawful activity as asserted by Plaintiff in its

Complaint occurred.

5. Any actions taken by the Defendants were taken for compelling or legitimate state interests.
6. The individual Defendants are entitled to qualified immunity.
7. Plaintiff has failed to exhaust administrative remedies.

**WHEREFORE**, Defendants request the Court to dismiss Plaintiff's Complaint and Demand for Jury Trial and assess the costs of this action to Plaintiff.

**THOMAS J. MILLER**  
Attorney General of Iowa

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ATTORNEYS FOR DEFENDANTS

*Original filed electronically.*

*Copy electronically served on all parties of record:*

<b>PROOF OF SERVICE</b>	
The undersigned certifies that the foregoing instrument was served upon each of the persons identified as receiving a copy by delivery in the following manner on January 18, 2018:	
<input type="checkbox"/> U.S. Mail	<input type="checkbox"/> FAX
<input type="checkbox"/> Hand Delivery	<input type="checkbox"/> Overnight Courier
<input type="checkbox"/> Federal Express	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> ECF System Participant (Electronic Service)	
Signature: <u>/s/Betty Christensen</u>	