

CI2026-12452



Cornell University
Office of General Counsel

Index # : EF2026-0292

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VIA NYSCEF

June 2, 2026

Hon. Mark G. Masler
New York Supreme Court
46 Greenbush Street, Suite 301
Cortland, NY 13045

Re: *John Doe v. Cornell University*
Tompkins County Supreme Court (Index No. EF2026-0292)

Dear Justice Masler:

I write on behalf of Respondent Cornell University ("Cornell") regarding the record the university intends to submit in opposition to the petition in this matter. Doe's petition involves a sensitive and extensive student conduct investigation and proceeding that involved seven respondents, eight additional witnesses, and 12 days of testimony. The record may well be 4-5,000 pages, including audio visual evidence, a 99-page decision, and over 1,700 pages of hearing transcripts. The sheer volume and complexity of this record makes upfront redaction of the entire record impracticable and burdensome. On top of that, the underlying subject matter involves allegations of sexual assault and sexual exploitation.

Given the sensitive nature of the underlying proceeding and the complex and voluminous record, Cornell respectfully requests permission to file the entire record for this proceeding unredacted, but under seal with the Court. As portions of record are cited or referenced by the parties in these proceedings, the parties will redact those narrow portions for filing. Doe's counsel consents to this request and has signed the attached Confidentiality and Protective Order, which Cornell encloses herewith and requests the Court so-order.

We thank the Court for its attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Adam Pence".

Adam G. Pence
Associate General Counsel

cc: Alan E. Sash, Esq.
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