# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

	X
STEPHANIE BIEDIGER, KAYLA LAWLER,	: CIVII ACTIONING
ERIN OVERDEVEST, KRISTEN	: CIVIL ACTION NO:
CORINALDESI, and LOGAN RIKER, individually and on behalf of all those similarly situated; and	: 3:09-CV-00621 (SRU)
ROBIN LAMOTT SPARKS, individually,	· :
Plaintiffs,	: :
against	: ;
QUINNIPIAC UNIVERSITY,	; ;
Defendant.	: :
	X

JOHN McDONALD declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

- 1. I am Director of Athletics and Recreation at Quinnipiac University, and submit this declaration in support of Quinnipiac's proposed Compliance Plan.
- 2. As indicated in the proposed Compliance Plan, Quinnipiac plans to add a varsity women's golf team in 2010-11, and a varsity women's rugby team in 2011-12. Quinnipiac has taken significant steps towards establishing both of these teams, which are described below.

### Golf

3. I have hired John O'Connor, who previously had been the coach of Quinnipiac's men's golf team, as coach of the women's golf team. Because of this experience, he is familiar with the University's athletics program and with the two golf courses where the team will practice and play (the New Haven Country Club and the Laurel View Country Club). This

experience will allow John to "hit the ground running" with the women's golf team for the 2010-11 season. I am also going to hire an assistant coach for the women's golf team.

- 4. The women's golf team will have an operating budget of approximately \$70,000 and the coach will have two full scholarships to distribute to attract athletes to our University. The coach will start recruiting athletes for the 2011-12 season very shortly. The budget and scholarship allocation for women's golf is very similar to the budget and scholarships the men's golf team received before it was eliminated in 2009.
- 5. The University recently distributed a survey to assess whether students were interested in joining a women's golf team. Twenty two students responded that they were interested in joining the team. Almost all of the students had played golf before, and several of the students were on their high school golf teams. One student was the captain of her high school golf team. (A copy of the survey results is attached as Exhibit A.)

#### Rugby

6. I am in the process of conducting a nation-wide search for a qualified women's rugby head coach. The University posted an announcement regarding this position, and I have been working with USA Rugby (the national governing body for the sport) to find qualified candidates. Several very promising candidates have expressed interest in this job, and I am in the process of interviewing these candidates. I expect that we will select a coach within the next two to four weeks. Once we hire a coach, we will expect him or her to immediately begin recruiting students for the 2011-12 season. The University will also hire a part time assistant coach.

- 7. The women's rugby team will practice and play in the Alumni House and Field, which is located behind the University's baseball field.
- 8. The women's rugby team will have an operating budget of approximately \$100,000, and the coach will be able to distribute up to six full scholarships to recruit the best athletes. The budget is comparable to that of Quinnipiac's women's lacrosse team, which has a similar squad size.
- 9. The University recently distributed a survey to assess whether students were interested in joining a women's rugby team. Fifty one students responded that they were interested in joining the team. Several of the students had experience playing rugby, and the other students all were athletes who played other sports, like basketball, softball, track, hockey and soccer. (A copy of the survey results is attached as Exhibit B.)
- 10. I have had a number of communications with representatives of USA Rugby in connection with our planning to begin a varsity women's rugby program, and I received written materials describing the facilities, equipment, and estimated costs for beginning a varsity team, as well as recruiting and competition possibilities. (A copy of information material I received from USA Rugby is attached as Exhibit C.) As described by USA Rugby, many college rugby athletes are cross-over athletes, who did not previously have experience playing rugby, but were athletes in other sports, such as soccer, softball, basketball and track. The skills athletes develop in these other sports are easily transferrable to rugby.
- 11. There are currently four varsity rugby teams at NCAA institutions three of which compete in the Northeast within reasonable travelling distance of Quinnipiac: Eastern Illinois University, West Chester University (located in eastern Pennsylvania), Bowdoin College

(located in Maine) and Norwich University (located in Vermont). There are also over 50 women's rugby club teams in the New England Region, with 11 teams at Connecticut schools, including Central Connecticut State University, Yale University, University of Connecticut, Connecticut College, Southern Connecticut State University, University of Hartford, and Western Connecticut State University. The scheduling of competition for the varsity team in 2011-12 will be decided by the coach, including the number of matches with other varsity teams and club teams.

### Cross-Country

12. There are 24 women on the cross-country team this fall. (A copy of the roster is attached as Exhibit D.) The team has competed in three meets to date, placing first at a meet on September 4, placing second at a meet on September 11, and placing first at a meet on September 18. (Copies of the meet results are attached as Exhibit E.) Twenty two athletes have competed in at least two of the three meets; the only two athletes who have not competed are scholarship athletes who are injured.

### Participation Policy

13. Quinnipiac has notified its coaches and student athletes in writing of its policy that no student is required to participate in one sport in order to participate in a different sport.

JOHN MCDONALD

9-25-10

DATE

# Exhibit A

#### Questionaire Responses: Would You Like To Play Women's Golf For Quinnipiac?

Dates: 01/01/2000 - 12/31/2012

Questionaire ID: 90009

4	!	Answer ID	IP Address	Date	First Name	Last Name	QU Email
	1	205425861		9/12/2010 10:42	Erin	Malley	
	2	205425909		9/12/2010 11:31	Amanda	Lubin	
	3	205425914		9/12/2010 11:47	Caroline	Quirk	
	4	205425884		9/12/2010 11:55	Emily	Vincent	
	5	205425933		9/12/2010 12:24	Bonnie	Braley	
	6	205425935		9/12/2010 12:26	Madeline	finkel	
	7	205425936		9/12/2010 12:26	Devon	Gibney	
	8	205425904		9/12/2010 12:38	Elizabeth	Emanuelson	
	9	205425960		9/12/2010 13:23	Amy	Hutchinson	
	10	205425992		9/12/2010 14:20	Brianne	Tansey	
	11	205426001		9/12/2010 14:29	Jennifer	Forlenza	
	12	205426068		9/12/2010 15:09	Catherine	Tobin	
	13	205426252		9/12/2010 18:06	Stephanie	Alwardt	
	14	205426513		9/12/2010 21:00	Emily	Tibbetts	
	15	205428148		9/13/2010 22:33	Carly	Kaplan	
	16	205428100		9/13/2010 22:58	Meghan	Moore	
	17	205428313		9/14/2010 0:38	Kelsey	Rayla	
	18	205429738		9/15/2010 12:25	Haley	Blatz	
	19	205430821		9/16/2010 10:35	Amy	Wayman	
	20	205433019		9/18/2010 10:21	Emily	Soto	
	21	205434787		9/19/2010 17:51	Lauren	Racine	
	22	205436160		9/20/2010 14:38	Ashley	Carter	
- 2	2 Records Listed.						

Your QU Class	Have You Played Golf Before?	Your Handicap	Please List Other Sports You Have Played
Sophomore	High School Boys Golf Team	not sure	High school softball and cheerleading
Junior	Yes	Not sure	lacrosse, soccer, volleyball, track
Freshman	yes	N/A	tennis
Freshman	Yes	28	Basketball, Softball, Powderpuff Fottball
Junior	no	N/A	field hockey, track, ski club
Junior	yes	unknown	softball, basketball, tennis
Junior	yes	14	QU womens tacrosse, field hockey, ice hockey
Freshman	Yes	29	Field Hockey, Softball
Junior	yes	32	sailing
Senior	Yes	18	ice hockey, soccer
Freshman	Yes	16	Fencing
Sophomore	Yes- Team captain of high school team	10-Aug	Basketball, track, and swimming
Freshman	Yes	N/A	Soccer, Basketball
Junior	Yes	12	Field hockey, soccer, tennis
Junior	yes	idk	soft-ball, tennis
Sophomore	Yes	40	Soccer, track, and lacrosse
Freshman	Yes	I have never kept track	Soccer, Track & Field, Cross Country
Freshman	A little bit. Never on a team.		Tennis
Senior	Yes	none	soccer, basketball
Junior	No	None	None
Freshman	yes	20	high school soccer and track
Sophomore	yes	80	Hockey and volleyball.

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Filed 09/27/10

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Exhibit B

Questionaire Responses: Would You Like To Play Women's Rugby For Quinnipiac?

Dates: 01/01/2000 - 12/31/2012

Questionaire ID: 89910

		B-t-	Last Name ON Second			
₩	Answer ID IP Address		Last Name QU Email		Have You Played Rugby Before?	Please List Other Sports You Have Played
	1 205425763	9/12/2010 9:18 Katie	Wood	Junior	No	Field Hockey, Basketball, Track and Field
	2 205425844	9/12/2010 9:29 Katie	Wood	Junior	No	Field Hockey, Basketball, Track and Fieldm Softball, and Soccer
	3 205425847	9/12/2010 9:47 Lindsay	Nolan	Sophomore	No	Soccer, Basketball, Softball
	4 205425771	9/12/2010 9:48 kayla	green	Freshman	no	basketball and volleyba;;
	5 205425780	9/12/2010 10:21 Lauren	Dufour	Sophomore	no	swimming, track (throwing)
	6 205425788	9/12/2010 10:51 Shannon	Gienty	Sophomore	Not competitively	Soccer for 12 years, basketball for 12, and Softball for 6
	7 205425796 8 205425800	9/12/2010 11:03 Ryan	Dyer O'Connor	Sophomore	No Yes	Track and field
		9/12/2010 11:08 Kelly		Freshman		field hockey
	9 205425803	9/12/2010 11:19 Alysha	Andrews	Junior	No	Field Hockey, Basketball, Lacrosse
	10 205425906 11 205425907	9/12/2010 11:24 Kristina	Lim	Senior	Yes	Basketball, Softball, Field Hockey
		9/12/2010 11:27 Marissa	Harper	Freshman	neverf	volleyball, ski racing, softball, soccer
	12 205425915	9/12/2010 11:47 Alyssa	Caggiano	Sophomore	recreationally	soccer, lacrosse
	13 205425886 14 205425897	9/12/2010 11:59 Taylor	Healey	Sophomore	No	Field Hockey
		9/12/2010 12:26 Bonnie	Braley	Junior	no	field hockey, track, ski club
	15 205425937	9/12/2010 12:27 Elicia	Fortier	Freshman	Yes	In high school I also played ice hockey and softball
	16 205425903	9/12/2010 12:37 Chelsea	True	Sophomore	no	cross country, track, ice hockey, recreational softaball, soccer, skiing, snowboarding etc
	17 205426011	9/12/2010 12:49 katelynn	lucyk	Freshman	no	cross country, basketball, soccer
	18 205425979	9/12/2010 13:49 Morgan	Farra	Sophomore	No	Swimming, Softball, Tennis, Basketball
	19 205426005	9/12/2010 14:34 Heather	Anderson	Senior	Yes	Field Hockey, Basketball, Softball
	20 205426107	9/12/2010 14:35 Annette	Wiecha	Freshman	No	Softball
	21 205426054		O'Brien	Freshman	No	Ice Hockey(15 years), field hockey, soccer, softball, lacrosse
	22 205426060	9/12/2010 14:55 Katie	Partin	Sophomore	no	field hockey
	23 205426120	9/12/2010 14:56 Katie	Bliss	Junior	กอ	field hockey, lacrosse
	24 205426061	9/12/2010 14:56 allison	rozovsky	Freshman	no	field hockey, lacrosse, tennis
	25 205426129	9/12/2010 15:17 Molly	Mahoney	Sophomore	no	track and field, cross country
	26 205426074	9/12/2010 15:21 Kristin	McAteer	Junior	No	Lacrosse, Soccer
	27 205426222	9/12/2010 17:15 Jordan	Berardi	Junior	no	soccer, basketball, softball
	28 205426236	9/12/2010 17:39 Megan	Hayes	Grad/Law	no	Basketball, softball, lacrosse, Javelin/shot put, volleyball
	29 205426237	9/12/2010 17:41 Sara	Mckersie	Sophomore	No	Volleyball and ice hockey
	30 205426238	9/12/2010 17:42 Jesse	Macera	Sophomore	no	soccer, basketball, softball
	31 205426254	9/12/2010 18:11 Lauren	Poliseno	Sophomore	no	field hockey and lacrosse
	32 205426352 33 205426795	9/12/2010 19:23 Elizabeth	Pinzon miele	Sophomore	no	soccer, softball, volleyball
		9/13/2010 9:20 jessy		Grad/Law	yes	soccer,mma,rugby at UMass Amherst and CSU Chico, basketball,track,dance
	34 205426890 35 205427144	9/13/2010 10:39 Meghan	McGrail	Junior	no	basketball, soccer, lacrosse, field hockey, softball
	36 205427144	9/13/2010 12:06 Samantha 9/13/2010 13:45 Jacqueline		Sophomore	No	Track&Field, Soccer, Basketball
	37 205427229	9/13/2010 17:06 Shylesha	Smith	Freshman Sophomore	no no	ice hockey, sailing, cross country, and track and field basketball
	38 205427873	9/13/2010 17:00 Silviesila 9/13/2010 20:53 Emily	Machado		กด	
	39 205427904	9/13/2010 20:53 Enniy 9/13/2010 21:07 Amanda	Frost	Junior Junior	No	Field Hockey, Gymnastics, Track
	40 205428012	9/13/2010 21:07 Amanda 9/13/2010 21:14 Breanne	Sullivan	Freshman	No	Volleyball, Basketball, Track-Hurdles and Shotput/Discus
	41 205428332	9/14/2010 21:14 Breatine 9/14/2010 1:52 Lauren	Vachon	Freshman	No	Field Hockey, Ice Hockey, Crew
	42 205428381	9/14/2010 1:32 Lauren 9/14/2010 8:56 Amelia	Houghton	Freshman	no	Varsity basketball, varsity volleyball and varsity track (shotput and discus)
	43 205429455	9/15/2010 0:41 Megan				gymnastics
	44 205431009	9/16/2010 0:41 Megan 9/16/2010 12:46 Rachel	Prestridge Nash	Sophomore Senior	No No	Soccer, track, volleyball Soccer
	45 205431033	9/16/2010 12:46 Rachel 9/16/2010 13:05 Elaine	Severo			
	45 205431033	9/17/2010 13:05 Elaine 9/17/2010 16:11 Kimberly	Barile	Junior Junior	no No	Ice Hockey and soccer
	47 205432707	9/17/2010 16:11 Kimberly 9/17/2010 19:46 Krystin	Orrico	Sophomore	No	Soccer, Lacrosse, Basketball
	48 205433004	9/18/2010 19:46 Krystin 9/18/2010 9:35 Jacqueline				Soccer, Basketball, Lacross, Track
	48 205433004		Maclearie Hvoslef	Junior	No	Field Hockey, Basketball, Softball, Lacrosse
	50 205435906	9/20/2010 10:32 Julia	Casinelli	Sophomore	No	Softball, Cross Country, Track
	50 205435906 51 205436994	9/20/2010 11:44 Christina 9/20/2010 23:24 Alexandra		Senior	No	Soccer
51 Records List		at solution 52:54 Miexaudia	SHROL	Senior	no	cross country, track, lacrosse, basketball
JI NCCOTUS LIST	cu.					

# Exhibit C





Thank you for contacting USA Rugby and it was a pleasure to speak with you.

As Quinnipiac University moves forward in expressing interest in new sports for the future, USA Rugby will be an ideal source for information on Women's NCAA Rugby.

Today, as NCAA institutions proactively seek additional avenues to provide additional athletic participation, USA Rugby invites you to take a moment to consider rugby as an option.

As an Emerging Sport, Women's NCAA rugby brings a combination of elements to areas including:

- ✓ Affordability
- ✓ Flexibility
- ✓ Opportunity to house a 30 student-athlete roster
- ✓ Resources for recruited student-athletes

#### Through this packet you will gain:

- Budget statistics and long term plans for the future growth of women's rugby at Quinnipiac University
- How Quinnipiac University can make history and shape the future of women's rugby in the NCAA
- How Quinnipiac can be a leader in participating in the first D-I women's rugby match in the NCAA

We at USA Rugby hope you will join us in our quest for the expansion NCAA rugby.

Sincerely,

Kristin Richeimer

## What your athletic department should know...

As USA Rugby assists NCAA institutions with information about Women's NCAA Rugby, there are a few crucial elements below we would like to highlight as we build solid relationship with administrators and athletic departments.

- USA Rugby operates as a resource. Our job is to provide information requested to assist your administration to implement a solid, sustainable rugby program which can have an immediate impact in shaping D-I Women's NCAA Rugby.
- As the National Governing Body for rugby in the United States, we are not a direct branch of enforcement of
  Title IX, rather an organization with trained, knowledgeable staff to assist institutions interested in adding
  Women's NCAA Rugby. While we highlight women's rugby as an ideal answer to compliance or gender equity for those who inquire, we realize that many institutions like Quinnipiac are adding opportunity for expansion of athletic offerings.
- At no time will your information or inquiries on women's NCAA Rugby be shared outside of the Emerging Sports Department at USA Rugby. Our organization is well aware that inquiries can be short or long term in scope and we respect your process and timeline.
- Those schools with interest in the process of adding are only shared with other NCAA administrators for purposes of providing evidence of conference and regional growth. Your permission must be granted for us to share any information with other NCAA athletic directors and administrators.
- USA Rugby is capable of providing statistical and budgetary information including coaching candidacy information, scheduling, travel, equipment, start-up and much more. Please don't hesitate to contact us for more information in each area.
- In October 2009, Rugby Sevens and Golf were added into the Olympics for women and men in 2016 and 2020. While Rugby Sevens is a separate discipline, there is ample opportunity and expectation that the Olympic inclusion will increase awareness of rugby in the US and varsity programs will be premier training ground for female Olympic athletes.



- We recognize that Quinnipiac University has continually demonstrated leadership locally and nationally in its commitment to athletics and providing student-athletes opportunity for character and life skills development.
- We are pleased to provide you with the following information and can be contacted at anytime in the event you have further questions. We also encourage contact with current athletic directors and administrators who currently field women's varsity rugby programs in the NCAA which can be provided at your request.

# **Quinnipiac Opportunity**

#### YOUR INVESTMENT OPPORTUNITY

Committing to the addition of a new sport at any NCAA institution is a serious investment for all parties involved.



When a prospective studentathlete considers the possibility of investing their future in Quinnipiac academics and athletics, it is the responsibility of the institution to assist the student-athlete in identifying whether or not Quinnipiac is the right fit.

Mirroring this philosophy, USA Rugby is committed to operating its campaign for women's varsity rugby with the same care and research.

The Emerging Sports Initiative does not extend this campaign to institutions in which the addition of Women's NCAA Rugby would not be of the utmost benefit to the institution and athletic department. The sport must "fit" the institution rather than requiring the institution to fit the sport.

### **BUDGET**

Among of the top three most attractive elements of adding Women's NCAA Rugby is affordability. Precise budget allocation for rugby is strictly an administrative determination, however rugby serves as an affordable yet productive option.

Typically, for minimum start-up costs, the estimate is around \$20,000-\$25,000 with the ability for steady growth during the developmental years in terms of travel and coaching staff.

Fellow D-I women's rugby program at Eastern Illinois University began in 2002 with \$27,000 devoted to the program and now operates over \$130,000 yearly. The items below should be considered guidelines and examples, we recognize that each institution will have it's own budget range for each sport, especially new additions.

#### **PRACTICE & GAME EQUIPMENT COSTS**

Scrum-sled Warm-ups Practice and game jerseys Shorts, socks, cleats Training and match balls
Cones
Tackle & blocking bags

Head gear & shoulder pads
Mouth guards

Note: While some equipment will need to be replaced after a few years, scrum sled and field equipment will last longer than 10 years.

### Game Practice Facility, (can be a typical phase-in project) Field Playing Area, 130 X 75 yd

Sprinkler System, Office Facility, Scoreboard, Team Benches Flag Pole, Spectator Seating, Fence Enclosure, Equipment Storage, Locker Room Development, Public Address System Goal Post Pads

#### **COACHING STAFF**

Current Salary Ranges: Head Coach (Part-time - Full-time)

Mid range full time \$40,000 - \$50,000

1 Head Coach, 1 Volunteer Assistant

Obviously, coaching staff composition depends on many administrative factors for producing a competitive program.

#### **FEMALE ENROLLMENT**

In adding women's rugby, your administration will find themselves in an advantageous position, having created 25-30 student-athlete opportunities at the lowest per athlete cost--comparable to roster sports half its size for half the cost.

#### **MARKETING AND FAN BASE**

Along with the increased awareness and interest that Olympic inclusion is expected to bring, collegiate rugby recently generated television audience with the first major network televised event on NBC.

While this was a men's rugby sevens event, the viewership was reported by NBC Sports as surpassing the NCAA Lacrosse Championships the previous weekend in the same time slot. This bodes extremely well for the development of interest by viewers in collegiate rugby.

On September 15, 2007, the first women's NCAA game was



played between the D-I women's team of Eastern Illinois University and the D-II squad at West Chester University.

The match-up warranted attention from USA Today, and ESPN drawing in over 1200 fans to the small town of Charleston, IL.

The Adidas-sponsored historical contest drew great exposure

for both institutions, their conferences, its members and the NCAA.

Additionally, Quinnipiac, would be presented the opportunity to play the first all D-I NCAA Women's Rugby game, should the institution add rugby as a varsity sport.

#### RECRUITING

Technical skills from soccer, softball, basketball and track are easily transferrable to rugby techniques.

There are always going to be athletes who just miss the opportunity to compete at the intercollegiate level in their primary sport, but still possess the interest, ability and dedication to perform as a rugby student-athlete.

Thus, the available pool of interscholastic student-athletes within the Northeast region is abundant. In conjunction with the intercollegiate expansion, the initiative has approached various state high school athletic associations regarding possible implementation of rugby at the interscholastic levels.

Promotion of interscholastic girls' rugby becomes increasingly more powerful in Connecticut and neighboring states with an add of Women's NCAA Rugby at Quinnipiac.

In addition, recruiting cross-over athletes from other sports is ideal for completing a full roster of student-athletes, while the high school initiative develops.

Example: Eastern Illinois University - Undergraduate enrollment 12,000

- Roster of 22 consists of former high school track, basketball, tennis, volleyball and soccer student-athletes
- Small town environment and 0.8 scholarships available divided among 15-20 prospects
- Due to geographic location which is limited to rural southeast Illinois, there is limited opportunity available averaging 1 walk-on per semester

Example: West Chester University - Undergraduate enrollment 12,800

- West Chester University rugby currently uses Philadelphia and metro area club HS teams as a prime recruiting base for rugby student-athletes and cross-over athletes make up 20% of the roster.
- Yearly preseason averages 40 female athletes with a roster of 25-30 with a traveling side

Both methods of recruiting have proved fitting and successful for both varsity programs.

Many of these athletes, along with crossover HS varsity athletes from other sports have the desire and ability to compete at a Division I institution. NCAA rugby at Quinnipiac could provide the opportunity these high school student-athletes so desire.

#### INTERNATIONAL RECRUITING

With the race for tuition dollars at it's most competitive, international students are often sought after as full paying students.

In Canada, especially the Ontario Province, the high school talent pool is outstanding as girls' rugby is an official interscholastic sport with over 350 schools sponsoring a team.

Canadian student-athletes could initially provide the talent pool to fill the highly skilled positions on the rugby field which include only two to four positions in a starting line up of 15.

This approach would be an administrative choice as the talent pool within the United States is sufficient to provide all the necessary athletic and skill abilities.



#### WHAT TYPE OF COMPETITION SCHEDULE?

With the flexibility of an Emerging Sport, Quinnipiac could reach a minimum 9 game schedule (max 11) in the first season by competing in a possible 8 NCAA cross-divisional match-ups with 1-2 club teams scheduled.

Again, schedule is an administrative decision and contingent upon budget allocation. An 11-game maximum or 9-game minimum schedule is achieved with schedule arrangement.

All interested institution's must keep in mind that future NCAA rugby programs for 2011, '12, and '13 can be factored into their varsity schedules.

As USA Rugby adheres to a strict confidentiality policy with each institution, we would not be able to release an institution's plans for adding without permission from the institution itself but we are happy to facilitate this process, if desired.

#### **COMPETITION SETUP**

In the event that your institution opts for a mixed varsity and club schedule, tournament participation is not recommended.

Keep in mind that men's intercollegiate football commits to one game a week in order to maintain student-athlete physical health and to achieve maximum team performance.

It is highly recommended that women's rugby be considered under the same guidelines as it is a full contact sport.

Tournament play may consist of 2-4 games in a weekend in the club structure with modified match length. With this setup almost 1/3 of the institution's schedule will be exhausted in one weekend.

The model of single game competition per week is recommended and encouraged as the safest route for protecting the student-athlete's health & safety, also regarding Bylaw 17's 11 contest limit.

#### **POSSIBLE SCHEDULE AND NCAA BYLAWS**

#### **Eastern Illinois University**

NCAA Division I (2 games) 1 home, 1 away

#### **West Chester University**

NCAA Division II (2 games)

1 home, 1 away

#### **Norwich University**

NCAA Division III (2 games) 1 away game, 1 home

#### **Bowdoin College**

NCAA Division III (2 games)

1 away game, 1 home

With mixed competition of both varsity (8) and club (2) teams.

\*\*The above possible schedule merely serves to imply a majority varsity schedule with other NCAA programs. In the interest of budget, a list of competitive club teams for more feasible traveling schedules is available. Please contact

USA Rugby for a full list.

### **FAQ NCAA BYLAWS & WOMEN'S RUGBY**

#### Q. How long is the season?

**A.** Length of an institution's playing season in women's rugby shall be limited to a 132 day season which may consist of two segments. Women's NCAA rugby is a fall sport.

# Q. How many contests is my program permitted according to NCAA bylaws?

**A.** Max limitation of season allows for 11 contests in any one year of competition for both the institution as well as the student-athletes other NCAA sport legislation also dictates exceptions for post-season play and national team participation.

#### Q. Is there a championship available?

**A.** Yes. USA Rugby hosts a club championship with participation available by varsity teams competing through regional qualification channels. In the future, with the addition of more varsity teams, an all varsity championship sponsored by USA Rugby is feasible.

Of course, the goal is to achieve 40 team membership for full NCAA championship status.

#### SAFETY, SAFETY

The CSMAS noted that as a collision sport, the injury risk and medical resources necessary to support the sport probably would be at least comparable to other collision sports such as soccer. Rugby meets the required criteria for establishment of an Emerging Sport.

"The committee believes that each member institution has a responsibility to manage the sport of rugby as it does all of its varsity sports.

The "culture" surrounding a particular sport often changes dramatically when it becomes a varsity sport due to the guidelines imposed by the NCAA and the institution."

### **FUNDRAISING OPPORTUNITIES**

There are significant ways that a varsity rugby program can provide resources and funding back to the institution. There are numerous examples of club and varsity men's and women's programs that have generated multi-million dollar alumni fundraising campaigns to support the development of dedicated rugby facilities etc.

Please feel free to contact us at any time for additional contacts and best practices.

### **OVERVIEW**

While most of the information above focuses on the development of an NCAA rugby program, the educational and collegiate experience of our rugby student-athletes is the main objective for the addition of these programs.

The beneficiary of these opportunities and NCAA Rugby will be the student-athletes who are on their final journey before embarking on their career objectives.

I would like to thank you for taking the time to review this information and would welcome the opportunity to discuss possible plans to develop an intercollegiate Bobcat Women's Rugby program.

For more information please contact the USA Rugby Director of Membership, Kristin Richeimer, at kricheimer@usarugby.org, 303.539.0300 ext 103



# Exhibit D

3	10	
8	me,	

## Women's Cross Country - 2010 Roster

Season 2010-11



Click on arrows to sort by chosen column.

Name	7	Ht.		- Marien	Hometown (Prev School)
Malloy, Kelly		5-4	Fr.		Sewell, N.J. (Bishop Eustace Prep)
Zielinski, Valerie		5-5	Fr.		Hackettstown, N.J. (Mt. Olive)
Airoldi, Abigail		5-4	So.		South Royalton, Vt. (Potter's House)
Beam, Katherine		5-5	Jr.		South Windsor, Conn. (South Windsor)
Cyr, Ashley		5-9	Fr.		Trumbull, Conn. (Trumbull)
Donadio, Hannah		5-6	Jr.		Killingworth, Conn. (Haddam-Killingworth)
Faust, Amanda		5-5	Fr.		Macungie, Pa. (Emmaus)
Faust, Brianna		5-4	Fr.		Macungie, Pa. (Emmaus)
Faust, Christina		5-5	Fr.		Macungie, Pa. (Emmaus)
Hammerton, Kaitlynn		5-10	So.		Campbell Hall, N.Y. (Washingtonville)
Humphreys, Jill		5-6	So.		Burlington, Conn. (Burlington)
Kelly, Kaitlin		5-2	Jr.		Weymouth, Mass. (Fontonne Academy)
Lanning, Julie		5-5	Jr.		Victor, N.Y. (Victor)
Massa, Patty		5-2	So.		Clifton Park, N.Y. (Shenendehowa)
Morelli, Rachel		5-4	Jr.		Philadelphia, Pa. (Saint Basil Academy)
Newcomb, Kelly		5-6	Fr.		Toms River, N.J. (Toms River North)
Pallotto, Paige		5-4	So.		Westbrook, Conn. (Amity Regional)
Roche, Morgan		5-2	Jr.		Clifton Park, N.Y. (Shenendehowa)
Santandreu, Martha		5-4	Jr.		Hamburg, N.Y. (Nardin Academy)
Soja, Jessica		5-9	Fr.		Simsbury, Conn. (Simsbury)
Sorrell, Kelly		5-4	Sr.		Lebanon, Conn. (Lyman Memorial)
Stevens, Kristen		5-8	Sr.		Succasunna, N.J. (Roxbury)
Szarkowicz, Andrea		5-10	So.		Watertown, Conn. (Watertown)
White, Becca		5-1	So.		Natick, Mass. (Natick)

<< Previous Season

Show Menu

# Exhibit E

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Just in Time Racing - Contractor License

Stony Brook University XC Invitational - 9/4/2010

Stony Brook University

Last Completed Event

Event 2 Women 4100 Meter Run CC

===						
	Name 		School	Avg Mile	Finals	Points
	 Hayley Green		 Stony Brook	5:45.4	14:39.77	1
2	Patricia Barry	JR	Stony Brook	5:53.1	14:59.57	2
3	Maria Jangsten	JR	Manhattan College	6:07.9	15:37.17	3
4	Andrea Szarkowicz	SO	Quinnipiac U	6:08.6	15:39.02	4
5	Christina Faust	FR	Quinnipiac U	6:09.4	15:40.93	5
6	Kristen Stevens	SR	Quinnipiac U	6:09.6	15:41.43	6
7	Brianna Faust	FR	Quinnipiac U	6:09.8	15:42.03	7
8	Jessica Soja	FR	Quinnipiac U	6:13.0	15:50.16	8
9	Meghan Hayes	FR	Manhattan College	6:15.3	15:55.95	9
10	Julie Lanning	JR	Quinnipiac U	6:15.7	15:57.00	10
11	Page Price	JR	Stony Brook	6:17.0	16:00.35	11
12	Martha Santandreu	JR	Quinnipiac U	6:18.9	16:05.17	12
13	Chelsea Hanson	SO	Iona	6:20.0	16:08.09	13
14	Chelsea Brisman	SR	Iona	6:20.4	16:09.04	14
15	Courtney Veilleux	FR	Iona	6:21.0	16:10.45	15
16	Leanne Skrabacz	SR	Stony Brook	6:21.4	16:11.45	16
17	Jelena Rankovic	SR	Manhattan College	6:22.7	16:14.92	17
18	Carolina Cortes	SR	Stony Brook	6:23.3	16:16.39	18
19	Chelsea Borbolla	SR	Iona	6:23.8	16:17.71	19
20	Kelly Newcomb	FR	Quinnipiac U	6:24.1	16:18.36	
21	Elizabeth Rosenberger	FR	Manhattan College	6:27.3	16:26.51	20
22	Kelly Malloy	FR	Quinnipiac U	6:27.7	16:27.54	
23	Kaitie Kelly	JR	Quinnipiac U	6:30.1	16:33.65	
24	Meghan Marro	SO	Manhattan College	6:30.5	16:34.62	21
25	Hannah Donadio	JR	Quinnipiac U	6:30.6	16:35.01	
26	Abigail Airoldi	SO	Quinnipiac U	6:31.0	16:36.03	
27	Valerie Zielinski	FR	Quinnipiac U	6:36.3	16:49.42	
28	Jill Fauser	JR	Stony Brook	6:36.6	16:50.37	22
29	Rachel Morelli	JR	Quinnipiac U	6:38.6	16:55.34	
30	Robin Lynn	FR	Stony Brook	6:39.2	16:56.79	23
31	Erin Brady	SO	Iona	6:40.2	16:59.38	24
32	Lindsey Smith	FR	Iona	6:50.1	17:24.64	25
33	Stephanie Dufort	JR	Manhattan College	6:58.2	17:45.29	26
34	Kaitlynn Hammerton	SO	Quinnipiac U	7:06.6	18:06.59	
35	Leigh Mazzella	FR	Iona	7:19.2	18:38.86	27
36	Shannon Christie	FR	Iona	7:26.5	18:57.47	

Team Scores

Each Team Total 1 2 3 4 5 \*6 \*7 \*8 \*9

# Case~3:09-cv-00621-SRU~Document~196-1~Filed~09/27/10~Page~20~of~29~file: IIIC/Documents%20 and %20 Settings/jeacohen/Desktop/stony%20 brook%20 cc%20 womans%20 results. htm

1 Quinnipiac Un	-	30	4	5	6	7	8	10	12
Total Time:									
Average:	15:42.72								
2 Stony Brook U	niversity	48	1	2	11	16	18	22	23
Total Time:	1:18:07.53								
Average:	15:37.51								
3 Manhattan Col	lege	70	3	9	17	20	21	26	
Total Time:	1:20:49.17								
Average:	16:09.84								
4 Iona		85	13	14	15	19	24	25	27
Total Time:	1:21:44.67								
Average:	16:20.94								

CCSU Cross Country Invitationa 1 Stanly Park New Britan, CT USA 09/11/2010 - 12:00 PM Weather: Sunny Results by: The Last Mile Race Mgt. www.thelastmileracing.com Phone: 860-456-4451 \*\*\*\* Official Results \*\*\*\* Place TmPl No. Name School Time Pace 1 281 MaryKate Champagne Providence Colla 1 17:31 5:38 2 287 Roecker Sam Providence Colla 17:43 5:42 3 123 White Becca Quinnipiac 17:57 5:47 4 351 Kimberly \*DeLoreto Sacred Heart Uni 18:03 5:49 5 284 Rebecca FfrenchO'C Providence Colla 18:07 5:50 Providence Colla 6 132 Perron Emma 6 18:11 5:51

7 263 Jennifer Nelson Monmouth Univers

5:52

18:14

8	8 119	Stevens Kristin	QUINNIPIAC
18:18 9		Christine Vogel	UCONN
18:20	5:54		0 0 0 1 1 1 1
		Faust Amanda	Quinnipiac
	11 286	Sara Graney	Providence Colla
	12 275	Kinsella Megan	Mount St. Mary's
18:31 13		Faust Brianna	Quinnipiac
18:32			~ * * * * * *
14 18:33		Schumacher Amie	Providence Colla
		Cassondra Hunter	UCONN
18:36 16		MARTHA REYNOLDS	Bryant
18:38		MAKIHA KEINOLDS	Bryanc
17	17 381	Alasia Griebel	Souhern Connecti
18:40 18		Faust Christina	Quinnipiac
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		Jeanne Theleen	UCONN
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20		Beam Katie	Quinnipiac
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18:47		Elizabeth Eberhard	Central Connecti
		Stephanie Ellis	UCONN
18:59			TICONIN
23 19:00		Christine Meagher	UCONN
		Christina Conley	Providence Colla
19:01			
25	25 291	Soja Jessica	Quinnipiac
19:02			
		Kelsey Maher	Monmouth Univers
19:02		~ !.! ~	
		Smith Colleen	Mount St. Mary's
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		Katherine Bossarde	: Cellital Collifecti
19:11	0:11		

29		MEGAN ROBERTSON	Bryant
19:16 30	285	Murphy Erin	Providence Colla
19:19 31		EIMEAR BLACK	Bryant
19:24 32		Juliet Smith	Monmouth Univers
19:26 33		Megan Papp	Sacred Heart Uni
19:27 34	6:16	Laura Isabelle	Providence Colla
19:31	6:17		
35 19:33		Brittney Lane	Sacred Heart Uni
36 19:34		Lanning Julie	Quinnipiac
37	180	Morelli Rachel	Quinnipiac
19:34 38	6:18 296	Newcomb Kelly	Quinnipiac
19:34 39		Christine Altland	Monmouth Univers
19:35 40	6:19		Mount St. Mary's
19:35	6:19	Franke Kathryn	-
41 19:36		Marissa Felicetti	Monmouth Univers
42		Olivia Civardi	Sacred Heart Uni
43	173	Santandreu Martha	Quinnipiac
19:37 44		Allison Cooper	UCONN
19:37 45		Jaclyn Sullivan	Souhern Connecti
19:38	6:19	Brittany Heninger	
19:38	6:19	_	
47 19:38		Alyssa Selmquist	Sacred Heart Uni
	42 262	Lucia Montefusco	Monmouth Univers
49	282	Arianna Colella	Providence Colla
19:39	6:20		

50	43 228	Elizabeth Crowley	College of the H
19:40	6:20		
		Nicole Coiteux	Central Connecti
19:44			
		Michelle Navarro	Sacred Heart Uni
19:46			
		Kelsey Proctor	Souhern Connecti
19:47			
		Brittany Llobell	Sacred Heart Uni
19:47		N/ N/ D ]	
55		Megan MacBryde	Central Connecti
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		Megan Carroll	Souhern Connecti
19:50		To some Others in an in-	Na
57		Joson Stephanie	Mount St. Mary's
19:53		7, 20, 20, 20, 20, 20, 20, 20, 20, 20, 20	Control Comment
		Amanda Asaro	Central Connecti
	6:25	Woller Wotio	Outpointes
59 19:57		Kelly Katie	Quimipiac
		Brianna Castrogiva	Cagred Heart Ini
19:59		Bilailla Castiogiva	Sacred Heart Uli
61		Samantha *Troy	Sagred Heart Uni
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62		Amanda Eller	Monmouth Univers
20:03		Amariaa Biici	Monimodell ollivers
63	389	Caitlin Cannon	UCONN
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		Donadio Hannah	Ouinnipiac
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65		Pallotto Paige	Ouinnipiac
20:06			Z
		Acosta Johanna	Providence Colla
66 20:07	6:29		
67	254	Lyndsy Horn	Monmouth Univers
20:07	6:29	±	
68	53 231	Elizabeth Fullerto	College of the H
20:09			-
69	267	Erin Szulewski	Monmouth Univers
20:11	6:30		
70		Emily MacEwen	Monmouth Univers
20:11	6:30		

		Airoldi Abby	Quinnipiac
20:16 72		Nicole Wojciechows	Monmouth Univers
20:20	54 237	Allison Hunter	College of the H
20:21		Brigid Paddock	Sacred Heart Uni
20:22 75	290	Malloy Kelly	Quinnipiac
20:23	261	Macey Marko	Monmouth Univers
77		Scott Desiree	Mount St. Mary's
20:28	56 225	Katelyn Andree	College of the H
20:29		Zielinsi Valerie	Quinnipiac
20:29	57 248	Vicki Tiedeman	College of the H
20:32		Erin *McPherson	Sacred Heart Uni
20:39		Hammerton Kaitlyn	Quinnipiac
20:39 83	67	Humphreys Jill	Quinnipiac
20:45 84		Mary St. Thomas	Sacred Heart Uni
20:46 85		Masa Patty	Quinnipiac
20:49 86		Alex Casares	Monmouth Univers
20:51 87		Sarah Mellea	College of the H
20:58		Erin O'Shea	Sacred Heart Uni
20:59 89		Kerry Dunne	College of the H
	6:46	Katherine Marrone	2
21:03 91	6:47	Cyr Ashley	Quinnipiac
21:03		Cyr Abiircy	δατιπιτριας

92 21:04	60 270 6:47	Earley Megan	Mount St. Mary's
93	353	Lauren Gruchala	Sacred Heart Uni
21:06 94		Allison Fimognari	College of the H
21:07	6:48		
95 21:13		Dana Troy	Sacred Heart Uni
96		Stacey Lepes	Monmouth Univers
21:17 97		Praydis Christina	Mount St. Mary's
21:18	6:52	_	_
98 21:18		Mackenzie Roche	Monmouth Univers
99		Elizabeth Corvese	Sacred Heart Uni
21:23 100		Martha Quinn	College of the H
21:25 101		Charlene Boria	Souhern Connecti
21:28		Charlene Boria	Sourier in Connecti
102 21:29		Kathleen Kasper	College of the H
103		Clark Molly	Mount St. Mary's
21:34 104		Kaitlyn Kramer	Monmouth Univers
21:34	6:57	-	MOIIIIOUCII OIIIVCIS
105 21:40		LAUREN GANIM	Bryant
106	64 380	Sarah Grenier	Souhern Connecti
21:44 107		Mary Fullerton	College of the H
21:47	7:01	-	J
108 21:50	376 7:02	Teresa Gagliostro	Sacred Heart Uni
109	358	Melissa Santoro	Sacred Heart Uni
21:58 110		Emma Healy	College of the H
22:00	7:05	_	_
111 22:11		Moira Hilt	Sacred Heart Uni
	279	Skidmore Dianne	Mount St. Mary's
44.1T	/ • <del>_</del> _ O		

		Katelyn Morrell	Souhern Connecti
22:17 114 22:20	256	Kristen Kearns	Monmouth Univers
115 22:21	337	Catherine Westby	Sacred Heart Uni
116 22:23		Alexandra Smith	Sacred Heart Uni
117 22:23	66 222	Rebecca Palmer	Central Connecti
118 22:31	343	Elizabeth *Brombac	Sacred Heart Uni
	334	Caitlin Clark	Sacred Heart Uni
120 22:40	67 219	Nicole Frantz	Central Connecti
	246	Katherine Rochford	College of the H
	68 206	EMILEIGH GILFOY	Bryant
123 23:14	377	Kiara Bonilla	Souhern Connecti
124 23:16	224	Larkin Sarah	Unattched
	366	Samantha Gillis	Sacred Heart Uni
		Shayna Bartell	Central Connecti
127 23:36		Abigail Hynes-Hous	College of the H
128 23:46		KAITLYNN CAMPBELL	Bryant
129 23:46	324 7:39	Alessandra Pacheco	Sacred Heart Uni
130 23:54		Stephanie John	College of the H
131 24:24		Bousquat Sara	Unattched
132 25:02		Tara Thomas	Sacred Heart Uni
133 25:46	350	Justine Ameye	Sacred Heart Uni

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### QU CC 2010 Womens Oversall.txt

Page 1

# QUINNIPIAC UNIVERSITY INVITATIONAL Hamden, Ct September 18, 2010

Place	Tmnl	No.	WOMEN'S	5 5K Yr	RESULTS School	Time
=====	====	====	======================================			=====
	1	35		So	Quinnipiac	18:13
5	2	18		Fr	Quinnipiac	18:41
3	3		Brianna Faust	Fr	Quinnipiac	18:53
4			Christina Faust	Fr	Quinnipiac	19:03
1 2 3 4 5 6 7 8	4 5 6	15	Katie Beam	Jr	Quinnipiac	19:05
6	6	31	Jessica Soja	Fr	Quinnipiac	19:07
7	1	47	Kristen Maĥoney	Jr	Stonehill Stonehill	19:08
8	7	33	Kristen Stevens	Sr	Quinnipiac	19:10
9	1 2	84	Cla <u>r</u> e Kane	Fr	Yale	19:12
10	2			So	Stonehill	19:13
11	8	34		So	Quinnipiac	19:15
12	9	24		Jr	Quinnipiac	19:20
13	3	48		So	Stonehill	19:24
14	10	29	Paige Pallotto	So	Quinnipiac	19:24
15 16	4 5	37	Jill Alves	Jr	Stonehill	19:26
		55	Stephanie Wilson	So	Stonehill	19:34
17 18	11 6	28 40		Fr	Quinnipiac	19:36 19:37
19	12		Lindsay Booth Martha Santandreu	Sr Jr	Stonehill	19:38
20	7	52	Amanda Tripodi	Sr	Quinnipiac Stonehill	19:39
21	8	30	Chelsea Bishop	Fr	Stonehill	19:40
22	9	50	Emily Regan	Fr	Stonehill	19:44
23	13	23		jr	Quinnipiac	19:51
24	10	38	Sarah Biggers	Fr	Stonehill	19:55
25	2		Wendy Dewolf	Fr	Yale	19:59
26	14	17	Hannah Donadio	Jr	Quinnipiac	20:04
27	15	27	Rachel Morrell	Jr	Quinnipiac	20:08
28	11	41	Jordan Campbell	Fr	Stonehill	20:13
29	16	25	Kelly Malloy	Fr	Quinnipiac	20:19
30	12	43	Jessica Jarrard	So	Stonehill	20:21
31	17	22	Jill Humphreys	So	Quinnipiac	20:24
32	18	14	Abigail Airoldi	Jr	Quinnipiac	20:25
33	19	21	Kaitlynn Hammerton		Quinnipiac	20:31
34	13		Alexis Monahan	So	Stonehill	20:33
35	20	26	Patty Massa	So	Quinnipiac	20:37
36	3		Kristin Johnson	Jr	Yale	20:39
37 38	4 14	42	Phoebe Gaston	So	Yale Stanobill	20:47 20:53
39	21		Maura Ferrarini Valerie Zielinski	Jr Fr	Stonehill Ouinniniac	20:55
40	22		Ashley Cyr	Fr	Quinnipiac Quinnipiac	21:19
41	15	15 15	Molly Kalla	Fr	Stonehill	21:42
42	16	46	Jesse Kilpatrick	So	Stonehill	21:54
43	17		Christina Scanlon	Fr	Stonehill	21:54
44	5		Celia Stockwell	Sr	Yale	22:56
	_				· • <del></del>	