

Bench & Bar

The newsletter of the Illinois State Bar Association's Bench & Bar Section

Civility: A Duty Owed by All Lawyers

BY VALERIE BRUMMEL

The COVID-19 pandemic has taken an enormous toll on us. It imposed a *human* cost: as of July 2022, more than one million Americans have reportedly died from COVID-19,¹ and even those who recovered may still suffer “a number of long-term health problems such as persistent pulmonary damage, post-viral fatigue, and chronic cardiac complications.”² It imposed an *economic* cost: damaging the global

economy, disrupting international trade relationships, and causing unemployment. It imposed a *political* cost: “disrupting international politics and creating new tensions between adversaries and allies alike.”³ And it imposed a *social* cost: separating families, friends, and neighbors through social distancing mandates and

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Title IX—7 Questions to Celebrate 37 Words

BY OLIVIA DUGGINS

Only 37 words helped change gender inequality in our country. Title IX became federal law on June 23, 1972, so this year is the 50th anniversary of the enactment of this groundbreaking legislation. Those impactful words are:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any educational program or activity receiving Federal financial assistance.

Title IX guarantees every person is entitled to equality in education including sports. In 1972, while women and girls

primarily played intramural sports, their worlds were expanded by the passage of Title IX. This powerful and all-encompassing law opened doors for female athletes which were previously sealed shut due to gender discrimination and inequality.

The impact on women's sports has been a game changer. But for Title IX, college athletes turned Olympians, like Brittany Griner, Mia Hamm, Lisa Leslie and Katie Ledecky may never have been allowed to showcase their skill and talent before the world. Perhaps Margaret Donahue,

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stay-at-home orders, and preventing in-person activities like classroom learning and restaurant dining.

The social cost of COVID-19 has researchers and commentators wondering, “Has COVID-19 occasioned a crisis of civility?” and “[is] Civility dead?”⁴ As one author aptly remarked, “Less tangible, but more insidious, is the growing sign that the uncertainty, angst, isolation, and distancing of the past [many] months has emboldened a small but growing number of individuals to become more disruptive and confrontational, and less civil and tolerant in their interactions with public officials, businesses, co-workers, neighbors and strangers.”⁵ The same may be true for interactions between lawyers, as costs of the pandemic include greater disruptions to home life stemming from remote work,⁶ more requests from opposing counsel for deadline extensions, and disagreements over whether proceedings should take place in-person or virtually.⁷

But—global pandemic, or not—lawyers have an obligation to treat one another with civility and courtesy. Article VIII of the Illinois Rules of Professional Conduct imposes upon all lawyers the “obligation zealously to protect and pursue a client’s legitimate interests, within the bounds of the law, **while maintaining a professional, courteous and civil attitude toward all persons** involved in the legal system.”⁸ This responsibility stems from the lawyer’s role as “an officer of the legal system and a public citizen having special responsibility for the quality of justice.”⁹ Similarly, the Standards for Professional Conduct within the Seventh Federal Judicial Circuit—which have been adopted by the Northern District of Illinois¹⁰—set forth the “Lawyers’ Duties to Other Counsel,” which include “treat[ing] all other counsel, parties, and witnesses in a **civil and courteous manner**, not only in court, but also in all other written and oral communications.”¹¹ The seventh circuit’s standards further require lawyers to refrain from “offensive conduct,” “disparaging

personal remarks or acrimony,” and “unfounded accusations of impropriety.”¹²

A lawyer’s responsibility to treat others with civility has been recognized by courts as well. For example, in *Adger v. R&L Management Co., Inc.*, the federal district court referred to the duty to act civilly and courteously as a reminder “about how we should treat each other, as human beings as well as lawyers and judges.”¹³ In *Evans v. Dart*, another federal district court “note[d] with dismay the unprofessional tone of Plaintiffs’ counsel’s letter, a letter riddled with sarcastic rhetorical questions and screenshots of text messages airing interpersonal conflicts,” and remarked that “[s]uch communication reflects poorly on the legal profession and are [sic] inconsistent with the court’s expectations.”¹⁴ Similarly, in *In re GSSI Liquidation, Inc.*, the bankruptcy court admonished the lawyers for making “rude” and “improper” arguments in violation of the seventh circuit’s standards, which “ill serve[d] their clients and adversely affect[ed] each counsel’s credibility.”¹⁵ The court cautioned that the lawyers “can rest assured that judges are not impressed or persuaded by those types of rude arguments.” The lawyers in *U.S. Neurosurgical, Inc. v. City of Chicago* went even further, launching “unnecessary and unfounded attacks on opposing counsel” that prompted the court to strike the offending remarks.¹⁶

While these judicial opinions serve as good reminders, ultimately, it is not the job of the judiciary to remind lawyers to act civilly. As the American Bar Association put it, “The legal profession is largely self-governing.” It is therefore each lawyer’s responsibility to ensure his or her compliance with the applicable legal, ethical, and professional duties—including the duty of civility. ■

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Bench & Bar

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The articles in this newsletter are not intended to be used and may not be relied on for penalty avoidance.

1. *Coronavirus in the U.S.: Latest Map and Case Count*, THE NEW YORK TIMES, available at <https://www.nytimes.com/interactive/2021/us/covid-cases.html> (last updated and accessed July 7, 2022).
2. Bonotti, M., Zech, S.T. (2021). THE HUMAN, ECONOMIC, SOCIAL, AND POLITICAL COSTS OF COVID-19. IN: RECOVERING CIVILITY DURING COVID-19. Palgrave Macmillan, Singapore. https://doi.org/10.1007/978-981-33-6706-7_1.
3. *Id.*
4. Matteo Bonotti & Steven Zech, *Has COVID-19 occasioned a crisis of civility? Responding to the social and political challenges of the pandemic*, Mar. 17, 2021, ABC, available at <https://www.abc.net.au/religion/covid-19-and-the-crisis-of-civility/13256582> (last accessed July 7, 2022); Nathan Lederman, *Civility dead? How the pandemic's end could affect civility in the Bay State*, Mar. 18, 2022, TELEGRAM & GAZETTE, available at <https://www.telegram.com/story/news/local/2022/03/18/civility-dead-how-pandemics-end-could-affect-civility-bay-state/7033420001/> (last accessed July 7, 2022).
5. Executive Director's Reports, *Incivility on the rise, another harmful symptom of the pandemic*, Nov. 2021, available at <https://www.mma.org/advocacy/incivility-on-the-rise-another-harmful-symptom-of-the-pandemic/> (last accessed July 7, 2022).
6. Carol Schiro Greenwald, *COVID-19 and Its Lasting Impact on the Legal Profession*, Oct. 13, 2021, NYSBA, available at [https://nysba.org/covid-19-and-its-lasting-](https://nysba.org/covid-19-and-its-lasting-impact-on-the-legal-profession/)

- [impact-on-the-legal-profession/](https://nysba.org/covid-19-and-its-lasting-impact-on-the-legal-profession/) (last accessed July 7, 2022) (“One negative impact mentioned by several lawyers is the change in clients’ definition of responsiveness. Clients now expect their lawyers to be available 24/7.”); *ABA’s Profile of the Legal Profession Explores COVID-19’s Lasting Impact*, Aug. 12, 2021, 2 CIVILITY, available at <https://www.2civility.org/the-aba-profile-of-the-legal-profession-explores-covid-19s-lasting-impact/> (last accessed July 7, 2022) (“While a majority of all lawyers (51%) felt it was hard to separate work and home during the pandemic, women (63%) and lawyers of color (62%) were more likely to struggle in this regard. Almost half of lawyers felt disengaged from their employer during the pandemic and overwhelmed by all they had to do.”).
7. Jack Karp, *COVID’s Impact on Litigation To Persist In 2022*, Jan. 4, 2022, LAW360, available at <https://www.lw.com/mediaCoverage/covid-impact-litigation-persist-2022> (last accessed July 7, 2022) (“Remote court proceedings and depositions are here to stay, as is the ongoing backlog in trials, litigators say.”).
8. M.R. 3140, *Article VIII. Illinois Rules of Professional Conduct of 2010, Preamble: a Lawyer’s Responsibilities*, available at <https://ilcourtsaudio.blob.core.windows.net/antilles-resources/resources/0c94eda9-0b73-4ea2-bc1d-4200e503f2a1/070109.pdf> (last accessed July 7, 2022) (emphasis added); see also Model Rules of Professional Conduct: Preamble & Scope, AMERICAN BAR ASSOCIATION, available at [- \[sional_responsibility/publications/model_rules_of_professional_conduct/model_rules_of_professional_conduct_preamble_scope/\]\(https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/model_rules_of_professional_conduct_preamble_scope/\) \(last accessed July 7, 2022\) \(same\).
 9. *Id.*
 10. See *Local Rules, Standards for Professional Conduct*, UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, available at <https://www.ilnd.uscourts.gov/Local-Rules.aspx> \(last accessed July 7, 2022\).
 11. *Standards for Professional Conduct Within the Seventh Federal Judicial Circuit*, UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT, available at <https://www.ca7.uscourts.gov/rules-procedures/rules/rules.htm#standards> \(last accessed July 7, 2022\) \(emphasis added\).
 12. Although “\[t\]he Seventh Circuit’s Standards for Professional Conduct are not a basis for any penalty or sanction,” “they provide lawyers and judges with a helpful guidepost.” *Adger v. R&L Mgmt. Co., Inc.*, 2019 WL 2511872, at *3 \(N.D. Ill. June 17, 2019\).
 13. 2019 WL 2511872, at *3.
 14. 2021 WL 2329372, at *5 n.9 \(N.D. Ill. June 8, 2021\).
 15. 389 B.R. 636, 638 \(Bankr. N.D. Ill. June 25, 2008\).
 16. 2006 WL 752970, at *1-2 \(N.D. Ill. Mar. 21, 2006\) \(“As recognized in the Seventh Circuit’s Preamble to the Standards for Professional Conduct, ‘conduct that may be characterized as uncivil, abrasive, abusive, hostile, or obstructive impedes the fundamental goal of resolving disputes rationally, peacefully, and efficiently. Such conduct tends to delay and often to deny justice.’”\).](https://www.americanbar.org/groups/profes-

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Title IX—7 Questions to Celebrate 37 Words

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the first woman executive for the Chicago Cubs, may not have inaugurated the idea for season ticket sales. Kane, et al. *Title IX Turns 50: Women Who Helped Change the Game*, CHICAGO TRIBUNE, Jun. 26, 2022, at 3. Dorothy Gaters, the winningest basketball coach in Illinois High School Association (IHSA) history, would not have led her girls’ basketball teams, including the Marshall Commandos of Chicago Marshall High School, to 1,153 victories. *Id.* at 4. Ola Bundy, assistant executive director for IHSA, would not have been able to organize girls’ state tournaments. *Id.* Clearly, without Title IX, the sports industry would not be where it is today and women would not have had a place in it.

Cook County Circuit Court Judge Debra Walker is among the long list of female athletes who benefited from Title IX. Judge Walker credits sports involvement as one of the important factors which helped define the trailblazer she is today. She called the plays as the quarterback for the Women Law Students Football team at the University of Illinois College of Law. As an athlete, Judge Walker learned the benefits of teamwork and competition while honing her leadership skills. These traits easily transferred to her educational pursuits and to Judge Walker’s

success as a trial attorney and Circuit Court Judge, and her impending rise to the appellate court. As a lifelong advocate for women’s advancement, it is serendipitous that when Judge Walker takes her seat on the Illinois appellate court on December 5, 2022, she will be the female justice to equalize the number of male and female justices on the Appellate bench in Illinois’ first district. In honor of Title IX’s 50th anniversary, Judge Walker reflected on the impact Title IX had in her life in an interview with this author, her 2022 summer judicial extern.

The Interview

1. Please describe your pre-Title IX experience – both in the classroom and on the field.

Title IX became the law of the land when I was twelve years old. I was a very young elementary school student, and I, of course, had no knowledge of what Title IX even was or what it meant. But when I got to the fifth grade, even though I was only ten, we were allowed to compete against other schools – girls’ teams – and I specifically recall softball and track, even before Title IX was adopted. I never felt any gender disparities of any kind in my rural classrooms, except when we were

required to wear skirts, even on frigid days!

2. What was your experience immediately after Title IX was signed into law? With respect to girls’ sports, did your school try to cling to the status quo or embrace a radical shift?

After Title IX, by the time I was in seventh and eighth grade, the sports offerings had greatly expanded. I was later to learn that was because Title IX mandated public schools to offer an equal number of teams for girls and boys. So, by seventh and eighth grade, in addition to track and softball, I was also playing volleyball and basketball against other schools. My rural junior high school immediately embraced Title IX as a federal mandate and allowed girls to have as many sports opportunities as boys.

3. Why do you think educational programs or activities needed to be the target of Title IX?

In 1972, all of these traveling teams did not exist. Community sports involvement barely existed. The sports involvement was all based in the schools. Public schools had to lead the way to get girls involved. They received government funding so they could be regulated.

4. How has being a part of sports teams impacted your overall life experience and development?

Being an athlete has absolutely impacted all aspects of my life. Personally, it has provided me with confidence, leadership skills, team-building and collaborative skills, as well as a competitive nature. All of those attributes have carried over into my professional life. People would sometimes question me as to why, even when I was a lawyer for several years, I still listed on my resume that I was the captain and quarterback of the U of I Women Law Students Football team. I would always respond that when I was being interviewed, it was usually by a man. To be able to talk about football always seemed to help me. I think it showed that I was a leader because I was the captain and quarterback. It showed that I could think on my feet and make quick decisions. To be the quarterback, you have to look at the entire field and think “Who’s open?” “Should I pass to that person?” or “Can I gain more yardage by running the ball instead of passing?” Those are the types of qualities that are revered by trial lawyers; to be able to think quickly on your feet, to be able to lead, to get people to do what you want to do in the huddle. It is a proven fact that girls who participate in sports are less likely to become unwed mothers, less likely to drop out of school, more likely to go on to college, finish college, and be leaders in their professions.

5. Did you face any barriers to play football at Illinois, and if so, what were they?

None at all. In fact, every year I was a law student, we would complete our season during the fall semester, and during the spring semester, we would play the faculty. That team was mostly comprised of men with a few women. I had an Academic All-American U of I football team player / law student as our coach, and I even had a law student quarterback coach who had played quarterback for SIU’s football team. The men were really invested in the women’s football team performing well. We won the university championship my second year of law school and took second during my third year of law school.

6. In your view, how has Title IX evolved in its application and significance in the legal system throughout the years, and are there lingering challenges that hinder full realization of the promise of Title IX?

Title IX is now being expanded in its definition of gender and sexuality. At the high school and college level, more organizations are aware of its mandates for fear of federal sanctions. Also, fathers of daughters who are involved in sports are less likely to be the men in the workplace who engage in harassment, bullying, or gender discrimination. That is an important legacy of Title IX. It seems like the focus of Title IX has been on sports programming, but are our educational institutions and other recipients of federal funds doing enough in other types of programming to ensure equality, such as in music, art, and academic competitions? Cultural norms impair full realization of Title IX. For example, we couldn’t wear pants to school until I was in the fourth grade. We had to wear skirts. As a new lawyer, I couldn’t even wear pants! Law firms said: “Judges won’t take you seriously if you wear a pantsuit.” My first three years of practice, we had to wear these floppy bow ties and a skirt whenever we went to court. Some of my colleagues would never wear a pantsuit in front of a jury. They thought they would be punished for not conforming to stereotypes. We need to continue to educate non-lawyers about Title IX and push for equality in all mandated programming.

7. How do you see Title IX at work in the next 50 years?

Will girls be fully incorporated into every possible type of STEM program, like high school robotics teams? I think we will see more changes and litigation along the lines of gender fluidity, use of bathrooms and locker rooms, and how that will be interpreted under federal law and Title IX.

Analysis

Title IX is the cornerstone of female sports as we know it today. As Judge Walker experienced, Title IX played a role in opening doors for women on the field, in the classroom, and in the courtroom. A unique history, surprising opposition, and lingering challenges color Title IX’s accolades, but do

not receive nearly as much attention. This analysis aims to shed light on these three facets.

History and Opposition

Title IX became the law of the land at a time when women were heavily overlooked in the sports arena compared to their male counterparts. Shanna McCarriston, *Title IX 50th Anniversary: What is Title IX, How it Became Law and How it Changed Athletics Forever*, CBS: CBS SPORTS (Mar. 4, 2022, 6:37 PM), <https://www.cbssports.com/general/news/title-ix-50th-anniversary-what-is-title-ix-how-it-became-law-and-how-it-changed-athletics-forever/>. Prior to Title IX, women were not afforded the ability to compete in a competitive manner or against other schools. *Id.* No women’s championships existed, sports equipment and training were seriously lacking, and importantly, no women’s athletic scholarships were offered. *Id.*

The passage of the Nineteenth Amendment in 1920 ignited an emphasis on women’s rights that was later renewed around the 1940s when more women joined the workforce as a result of the World Wars. Richard C. Bell, *A History of Women in Sport Prior to Title IX*, THE SPORT JOURNAL (Mar. 14, 2008), <https://thesportjournal.org/article/a-history-of-women-in-sport-prior-to-title-ix/>. From this period to the signage of Title IX in 1972, proponents of equality in women’s sports experienced a series of “wins” specific to intercollegiate activities. Namely, the Division for Girls and Women’s Sports (DGWS) opened the channels for the possibility of women’s intercollegiate programs by amending its position statement to say that they “may” exist. *Id.* After this permission was granted, a specific role was created to assist in the advancement of women’s intercollegiate programs. *Id.* This momentous wave continued on the heels of the Feminist and Civil Rights Movements as the National Organization for Women (NOW) had its first conference in 1967 and emphasized equal educational opportunities for women. *Id.* President Nixon signed Title IX of the Education Amendments into law on June 23, 1972, but was met with a series of efforts to curtail Title IX enforcement by opponents.

Although Judge Walker’s school may have immediately embraced Title IX as the law of

the land, many institutions were not nearly as welcome to the change. The National Collegiate Athletic Association (NCAA) just celebrated the 50th Anniversary of Title IX last month at the 2022 NCAA Convention in Indianapolis, but interestingly enough, the NCAA was one of Title IX's most vocal opponents. Gail Dent, *NCAA Kicks off Title IX at 50 Celebration*, NCAA (Jan. 19, 2022, 2:19 PM), <https://www.ncaa.org/news/2022/1/25/media-center-ncaa-kicks-off-title-ix-at-50-celebration.aspx>. The potential equalization of intercollegiate competitive sports between men and women was viewed as a threat to the institution's finances and political power. Richard C. Bell, *A History of Women in Sport Prior to Title IX*, THE SPORT JOURNAL (Mar. 14, 2008), <https://thesportjournal.org/article/a-history-of-women-in-sport-prior-to-title-ix/>. In fact, the NCAA took active measures to limit the scope of Title IX's application, including releasing a statement that argued that Title IX should not apply to athletic departments because they were not federally funded. *Id.* This notion was recognized by the Supreme Court in *Grove City College v. Bell*, 465 U.S. 555, 573 (1984) which broadly held that Title IX applied to programs receiving direct federal funding, gutting the applicability to athletic programs. Thankfully, *Grove City* was a short-lived decision that was superseded by the Civil Rights Restoration Act. See 20 U.S.C. § 1687. Subsequent amendments have refined Title IX's robust application to athletics and gave Title IX its legitimacy.

Challenges

As groundbreaking as the enactment of Title IX was, certain challenges hinder the full realization of the promise of Title IX. Judge Walker's ability to play football with no barriers was unfortunately an anomaly; harassment, social norms, and public misunderstanding are just a few of the lingering challenges that threaten to denude Title IX of its full potential.

First, Title IX may have been enforced prematurely before America was adequately prepared to adjust to the radical shift in the sports industry. As a result, proper training, equipment, and other preventative measures were likely not well-known at the time Title IX was adopted and resulted

in an uptick in injuries. Linda Flanagan & Susan Greenberg, *How Title IX Hurts Female Athletes*, ATLANTIC (Feb. 27, 2012), <https://www.theatlantic.com/entertainment/archive/2012/02/how-title-ix-hurts-female-athletes/253525/>. Studies show female athletes are up to five times more likely to tear their A.C.L than their male counterparts. *Id.* Female athletes are at risk for the disorder known as "female athlete triad" where eating too little or exercising too much can cause eating disorders, bone loss, or early cessation of menstrual cycles. *Id.* Societal pressures do not help this issue, and each resulting problem may have lifelong negative consequences. Additionally, statistics indicate that female athletes tend to suffer concussions at significantly higher rates than males. *Id.*

The Women Law Students football team at the Illinois College of Law was assisted by a male coach and male quarterback coach, which followed the trend of America at large. Since the implementation of Title IX, the number of males coaching women's teams skyrocketed to equalize the proportion of male to female coaches, a displacement of the pre-Title IX 90% female coach makeup. *Id.* While certainly not the norm, the most dangerous effect of this change is the increased exposure to sexual harassment and abuse. *Id.*

Many understand Title IX as centrally targeting women's sports, but Title IX's true goal was all-inclusive equality in the educational environment. Expanding on Judge Walker's intuition about non-athletic programming, equal access to STEM programs, music and art programs, and in the classroom at large are encompassed in the promise of Title IX. See 20 U.S.C. § 1687. Educating the public on the importance of Title IX in non-athletic programs is essential to the advancement of women, but societal norms and the current political climate stymie this goal. Just 30 years ago, Judge Walker, and many of her female colleagues believed that wearing a pantsuit meant that they would not be taken seriously in the courtroom. How can we achieve equitable access across the educational realm when women perpetually fear reprisal for failure to conform to societal expectations?

Additionally, as noted by Judge Walker, Title IX is evolving in the direction of

expanded protections for the LGBTQ+ community. See Press Release, U.S. Department of Education Confirms Title IX Protects Students from Discrimination Based on Sexual Orientation and Gender Identity, <https://www.ed.gov/news/press-releases/us-department-education-confirms-title-ix-protects-students-discrimination-based-sexual-orientation-and-gender-identity> (Jun. 16, 2021). Today's ultra-conservative U. S. Supreme Court and overly polarized political climate threaten to delay these expanded protections due to hot debate over the definition and recognition of transgender individuals and athletes. See generally Catharine R. Stimpson, *Dereliction, Due Process, and Decorum: The Crises of Title IX*, SIGNS: JOURNAL OF WOMEN IN CULTURE AND SOCIETY: Vol 47, No 2 (uchicago.edu). Finally, equality does not mean equity, and Title IX is no exception. Female professional athletes are grossly underpaid compared to male athletes, receive less brand deals, and overall less recognition for the same athletic accomplishments. Andrew Zimbalist, *Female Athletes are Undervalued, in Both Money and Media Terms*, FORBES, (Apr. 10, 2019, 7:00 AM), <https://www.forbes.com/sites/andrewzimbalist/2019/04/10/female-athletes-are-undervalued-in-both-money-and-media-terms/?sh=350e63df13ed>.

As we celebrate the past 50 years in the post-Title IX era, it is important to recall Title IX in its good, bad, and ugly moments. Title IX is a cornerstone of female empowerment and played a role in the success of our most notable female professionals, including Judge Walker. While Title IX single-handedly revolutionized women's sports and the advancement of women, there is still a long way to go. May the next 50 years be dedicated to addressing the identified challenges and finding ways to uphold the letter and spirit of Title IX. ■

Olivia Duggins is Judge Walker's summer 2022 judicial extern. Olivia is a 2L at the University of Illinois College of Law. She is a member of the Illinois Law Review. Olivia also serves as a competitor for the ABA Client Counseling Board, fundraising chair for the Public Interest Law Foundation, secretary for the Women's Law Society, member director for the newly founded Illinois Jurisprudence Society, and 2L representative for Barbri Bar Review.

Bench & Bar DEI Committee Update

The diversity, equity, and inclusion (DEI) committee seeks to educate, examine, and address DEI issues in legal profession. Topics include implicit bias in the legal profession, systemic barriers for various groups, bias training for the judiciary and bar, and the role of DEI factors in judicial evaluations. Over the years, Co-Chair Justice Michael B. Hyman, First Appellate District, has led various diversity initiatives for the judiciary and the CBA. Most recently, he has participated in the establishment of the CBA Diversity Inclusion Culture and Equity and Engagement (DICE) committee focused on tackling anti-minority sentiments and

attitudes. Co-Chair Jaz Park, an employment law attorney, also brings experience leading DEI initiatives, as a co-chair of the Minority Bar CLE Conference as well as the chair of the Subcommittee on Diversity in the Legal Profession of the ISBA Steering Committee on Racial Inequality. Together, the co-chairs are hopeful that they will be able to bring necessary conversations to the fore in this section council.

Co-chairs:

Jaz Park
Justice Michael B. Hyman ■

Recent Appointments and Retirements

1. Pursuant to its constitutional authority the supreme court has appointed the following to the supreme court:

- Hon. Lisa Holder White, 4th District, July 8, 2022

2. Pursuant to its constitutional authority, the supreme court has appointed the following to be circuit judge:

- Hon. Joseph R. Waldeck, Retired Associate Judge recalled, 19th Circuit, May 2, 2022
- Mark Isaf, 5th Circuit, June 1, 2022
- Hon. Clayton L. Lindsey, 15th Circuit, June 1, 2022
- Robin L. Schmidt, 7th Circuit, June 8, 2022
- Hon. Philip G. Montgomery, 23rd Circuit, July 5, 2022
- Marlow A. Jones, 21st Circuit, July 6, 2022
- Tamika R. Walker, 17th Circuit, July 6, 2022
- Hon. John McAdams, 23rd Circuit, July 11, 2022

3. Pursuant to its constitutional authority, the supreme court has appointed the following judges to the appellate court:

- Hon. Joseph P. Hettel, 3rd District, July 2, 2022

- Hon. Raymond W. Mitchell, 1st District, July 6, 2022
- Hon. Eugene Doherty, 4th District, July 14, 2022

4. Pursuant to its constitutional authority, the supreme court has made the following assignment to the appellate court:

- Hon. Kathryn E. Zenoff, 17th Circuit previously assigned to the 3rd district is now assigned to the 4th District, June 1, 2022

5. The following judges have retired:

- Hon. Tom M. Lytton, Appellate Court, 3rd District July 1, 2022
- Hon. David A. Skryd, Associate Judge, Cook County Circuit, July 1, 2022
- Hon. Thomas L. Doherty 23rd Circuit, July 4, 2022
- Hon. Adrienne W. Albrecht, 21st Circuit, July 5, 2022
- Hon. Philip B. Alfeld, Associate Judge, 3rd Circuit, July 5, 2022
- Hon. Mary Linn Green, Associate Judge, 17th Circuit, July 5, 2022
- Hon. Sheldon A. Harris, Appellate Court, 1st District July 5, 2022
- Hon. Rita B. Garman, Justice, Supreme Court, 4th District July 7,

2022

- Hon. Michael J. Powers, 12th Circuit, July 8, 2022
- Hon. Melissa S. Barnhart, 23rd Circuit, July 10, 2022
- Hon. E. W. Sexton, Associate Judge, 18th Circuit, July 11, 2022
- Hon. Marcia Maras, Cook County Circuit, July 15, 2022
- Hon. Thomas W. Chapman, Associate Judge, 3rd Circuit, July 21, 2022
- Hon. Robert A. Wilbrandt, Jr., 22nd Circuit, July 23, 2022
- Hon. Donald R. Havis, Associate Judge, Cook County Circuit, July 31, 2022
- Hon. Andrea M. Schleifer, 12th Subcircuit, Cook County Circuit, July 31, 2022

6. The following judges have deceased:

- Hon. Ramon M. Escapa, Appointed Judge, 8th Circuit, June 19, 2022
- Hon. Daniel Schmidt, 3d District, Appellate Court, July 5, 2022 ■