## STATE OF CONNECTICUT OFFICE OF THE CLAIMS COMMISSIONER

David G. Woods, Claimant No.

Vs.

May 13, 2014

State of Connecticut, Respondent

## NOTICE OF CLAIM SEEKING PERMISSION TO SUE THE STATE OF CONNECTICUT

Please be advised that this firm represents David G. Woods, formerly the Dean of the School of Fine Arts at the University of Connecticut. On or about February 26, 2014, the Board of Trustees of the University of Connecticut and President Susan Herbst caused a report to be issued by Drinker, Biddle & Reath, LLP ("the Drinker Report"), an agent of the University of Connecticut. The Drinker Report was released to the media after being issued on February 26, 2014, including the Hartford Courant, CT Now, and other media outlets in the State of Connecticut. The Drinker Report contained false statements of fact harmful to the reputation of Dean David G. Woods and is being relied upon to seek the termination of Dean Woods' employment from the University of Connecticut. President Susan Herbst and the Board of Trustees released the report making false claims about Dean Woods for an improper purpose: namely to create a scapegoat when Dean Woods at all times followed University protocols and procedures in order to receive false praise by comparison. Following the release of the Drinker Report to the press, Dean Woods' reputation has suffered harm and he has been denied economic and other beneficial opportunities that he would otherwise have received.

Wherefore, David G. Woods seeks permission to sue the State of Connecticut to bring claims, including but not limited to, defamation, intentional interference with contract and with advantageous business opportunities,

negligent investigation and intentional and negligent infliction of emotional distress. The full extent of the harm suffered by Dean Woods is not yet known, however the amount of the claim is in excess of the \$15,000.00 benchmark for determination of the filing fee.

CLAIMANT

DAVID G, WOODS

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