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February 6, 2004

Dr. Laura A. Wankel
Vice President, Student Affairs
Seton Hall University
400 South Orange Avenue
South Orange, New Jersey 07079

Re: Anthony Romeo
Sexual Orientation Discrimination

Dear Dr. Wankel:

This firm has been retained by Anthony Romeo in regard to illegal and discriminatory treatment to which he and other students have been subjected based on their sexual orientation. Please have no further direct contact with Mr. Romeo and refer inquiries and concerns to the undersigned.

It is with great dismay and concern that we reviewed the facts and circumstances giving rise to Seton Hall denying Gay and Lesbian students the same opportunity as all others, to celebrate their identity with full University recognition. Your December 18, 2003 memorandum rejecting recognition of "TRUTH" sets a bad example for the student body and encourages division, not respect, based upon the illegal criteria of sexual orientation. As we reject separate but equal as inherently unequal, we are compelled to reject the proposed Memorandum of Understanding proffered by Seton Hall.

In a gesture of goodwill, we respectfully request to meet with you and others in the Administration to discuss the foregoing within the next two weeks. We anticipate and hope that through dialogue, this dispute can be resolved. My firm has a well established track record of litigating Gay and Lesbian rights and are committed to zealously advocating on behalf of Mr. Romeo and like-minded students. We prefer to amicably resolve differences. However, should Seton Hall continue to advocate division, which breeds hate and violence, you will leave us with no choice but to have a court remedy this illegal conduct. Please contact me upon receipt to arrange a meeting if you share our desire to amicably resolve this issue. I remain,

Respectfully yours,


Thomas D. Shanahan