

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

BRENDA TRACY,

Plaintiff,

v.

BOARD OF TRUSTEES OF  
MICHIGAN STATE UNIVERSITY,  
DENNIS DENNO and REMA  
VASSAR, current members of the  
BOARD OF TRUSTEES of Michigan  
State University, in their personal and  
official capacity, jointly and severally,

Defendants.

Case No. 1:25-cv-00614

Hon. Paul L. Maloney,  
U.S. District Judge

Hon. Maarten Vermaat,  
U.S. Magistrate Judge

**DEFENDANTS' MOTION TO DISMISS**

Defendants Board of Trustees of Michigan State University, Dennis Denno, and Rema Vassar (collectively, the “Defendants”), by their undersigned attorneys, move this Court for an Order dismissing Plaintiff’s Complaint with prejudice as to all counts against them pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a plausible claim for relief. In support of this motion, Defendants rely upon the accompanying brief in support and the documents attached thereto as exhibits.

WHEREFORE, Defendants respectfully ask this Court to dismiss Plaintiff’s Complaint with prejudice and grant any other relief as may be just and appropriate.

Dated: August 29, 2025

Respectfully submitted,

/s/ Terri L. Chase

Terri L. Chase

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