IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SARAH SPITALNICK,	*	
Plaintiff,	*	
v.	*	**Civ. No. JKB-24-1367**
KING & SPALDING, LLP,	*	
Defendant.	*	

* * * * * * * * * * * *

MEMORANDUM

Plaintiff Sarah Spitalnick sued Defendant King & Spalding, LLP on claims of unlawful employment discrimination. (ECF No. 1 at 1.) Now before the Court is Defendant's Motion to Dismiss, which argues both a lack of subject-matter jurisdiction and a failure to state a claim. (ECF No. 13 at 1.) The Motion is fully briefed, and no hearing is required. *See* Local Rule 105.6 (D. Md. 2023).

For the reasons below, Defendant's Motion will be granted, and Plaintiff's claims will be dismissed for lack of jurisdiction.

I. BACKGROUND

A. Factual Background[1]

In or around February 2021, Plaintiff was a first-year student at the University of Baltimore School of Law ("UB Law"). (ECF No. 1 ¶ 10.) At the time, she was "actively engaged in a search for a summer internship." (*Id.*)

[1] The following representations of fact are reproduced, in relevant part, from the allegations set forth in Plaintiff's Complaint, (ECF No. 1), and her later affidavit, (ECF No. 23-3). For purposes of assessing Defendant's Motion, the allegations are assumed true. *See Adams v. Bain*, 697 F.2d 1213, 1219 (4th Cir. 1982).

UB Law provides an online platform, UB Law Connect, on which employers can advertise open positions, and through which UB Law students can apply directly to the same. (ECF No. 1 ¶ 11.)

During Plaintiff's first year of law school, Defendant used UB Law Connect to advertise its "Leadership Counsel Legal Diversity" ("LCLD") summer program. (ECF No. 1 ¶ 12; ECF No. 23-3 ¶ 3.) The posting advertised a summer associate position, offering applicants a chance "to work in multiple practice areas across the firm." (ECF No. 1, Ex. A, at 9.) It also promoted an opportunity "to participate in [Defendant's] firm-wide Summer Summit, experience [its] K&S [King & Spalding] travel program, and benefit from substantive training programs." (*Id.*) "More importantly," it added, LCLD associates would "get a realistic sense of what [they] will do as . . . lawyer[s] at K&S—through challenging assignments and real work—with guidance from partners and summer mentors." (*Id.*)

Plaintiff alleges the posting "immediately caught [her] attention," as she believed it might offer a chance "to acquire the legal skills needed to be an effective advocate for minority and other disadvantaged groups." (ECF No. 23-3 ¶ 3.) Against a backdrop of her involvement in "different projects and activities promoting the rights and interests" of those groups, (*id.* ¶ 4), and her interest "in fighting to protect non-heterosexual individuals from discrimination," (*id.* ¶ 6), Plaintiff took a "real and active interest" in the position. (*See* ECF No. 1 ¶ 17.)

As she read further, however, Plaintiff was "completely shocked" by one of the conditions of employment. (ECF No. 23-3 ¶ 5.) In the posting, Defendant stated that, among other things, candidates "must have an ethnically or culturally diverse background or be a member of the LGBT community." (ECF No. 1 ¶ 13; *id.* Ex. A, at 9.) In Plaintiff's view, she "clearly" did not meet this requirement. (*See* ECF No. 23-3 ¶ 5.) Because she is white, she believed she did not qualify as

having an "ethnically or culturally diverse background." (*Id.*; ECF No. 1 ¶ 18.) And because she is straight, she believed she did not qualify as a "member of the LGBT community." (*See* ECF No. 23-3 ¶ 5; ECF No. 1 ¶¶ 14, 19.) Otherwise, she "met all stated qualifications." (*Id.* ¶ 20.)

That Plaintiff might be "exclude[d] . . . from consideration for a job" because of her race and sexual orientation "was a true gut punch for [her]." (ECF No. 23-3 ¶ 7.) This was especially so with respect to a position she was "truly interested in" and that "could advance [her] career in ways [she] had always dreamed of." (*See id.*)

Because she believed her race and sexual orientation precluded her from consideration for the position, Plaintiff was "deterred from applying" at all. (ECF No. 1 ¶ 21.) In particular, she says she did not apply "because doing so would have been a futile gesture in light of Defendant's expressly stated racial and sexual orientation preferences." (*Id.* ¶ 22; *see also* ECF No. 23-3 ¶ 9.) Plaintiff alleges this "denied [her] an opportunity for employment" she was otherwise qualified to hold, (ECF No. 1 ¶ 23), and caused her to incur "significant damages," (*id.* ¶ 24).

Plaintiff graduated from UB Law in 2023. (ECF No. 23-3 ¶ 2.) She is also a member of the bars of the State of Maryland and of this Court, (*id.* ¶ 1), having been admitted to the former on November 29, 2023, *see Maryland Attorney Listing*, Md. Cts., https://www.mdcourts.gov/attysearch, and to the latter on September 13, 2024, *see Bar Member Search*, U.S. Dist. Ct., Dist. Md., https://www.mdd.uscourts.gov/bar-member-search.

B. Procedural History

On May 9, 2024, Plaintiff filed her Complaint in this Court. (ECF No. 1.) She brings two claims: first, a claim asserting a violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e–2000e-17 (Count I); and second, a claim asserting a violation of the Civil Rights Act of 1866, 42 U.S.C. § 1981 (Count II). (*Id.* at 4–5.)

Plaintiff seeks several distinct forms of relief. Some of this relief is retrospective, such as various monetary remedies and "a public apology" from Defendant. (ECF No. 1 at 6.) The rest is prospective—namely, an injunction ordering Defendant to "cease using euphemisms for racial and or color preferences in its job postings," to "cease discriminating against job candidates on the basis of their sexual orientation," and to "implement internal policies and procedures designed to ensure that job postings do not run afoul of the anti-discrimination laws of the United States." (*Id.*)

On September 19, 2024, Defendant moved to dismiss. (ECF No. 13.) It seeks dismissal on two grounds: first, for a lack of subject-matter jurisdiction to decide the dispute, *see* Fed. R. Civ. P. 12(b)(1); and second, for Plaintiffs' failure to state a claim upon which relief can be granted, *see* Fed. R. Civ. P. 12(b)(6). (ECF No. 13 at 1.)

II. LEGAL STANDARD

Federal Rule of Civil Procedure 12(b)(1) is the procedural vehicle by which a party moves to dismiss a case for lack of subject-matter jurisdiction. *See Ali v. Hogan*, 496 F. Supp. 3d 917, 922 (D. Md. 2020) (citing *Taubman Realty Grp. Ltd. P'ship v. Mineta*, 320 F.3d 475, 480–81 (4th Cir. 2003)). This includes motions to dismiss for defects in standing. *See id.*

A defendant may challenge the district court's subject-matter jurisdiction in two ways. *In re Moore*, 488 F. Supp. 3d 231, 235 (D. Md. 2020). First, it "may raise a facial challenge, alleging 'that a complaint simply fails to allege facts upon which subject matter jurisdiction can be based.'" *Id.* (quoting *Adams v. Bain*, 697 F.2d 1213, 1219 (4th Cir. 1982)). In that posture, as with motions to dismiss for failure to state a claim, the Court accepts as true the allegations of the complaint and draws all reasonable inferences in favor of the plaintiff. *See Warth v. Seldin*, 422 U.S. 490, 501 (1975). Second, it "may raise a factual challenge, asserting that the jurisdictional allegations in the complaint are untrue." *Moore*, 488 F. Supp. 3d at 236 (citing *Kerns v. United States*, 585 F.3d

187, 192 (4th Cir. 2009)). Under that sort of challenge, "the court may consider evidence outside of the pleadings without converting the motion to one for summary judgment," *id.* (citing *Kerns*, 585 F.3d at 192), and "is to regard the pleadings as mere evidence on the issue" of jurisdiction, *Evans v. B.F. Perkins Co.*, 166 F.3d 642, 647 (4th Cir. 1999) (citation omitted).

III. ANALYSIS

Article III of the Constitution limits the judicial power of the federal courts to the resolution of "Cases" and "Controversies." U.S. Const., art. III, § 2, cl. 1. The law has long understood this language to limit the judiciary to settling "genuine, live dispute[s] between adverse parties, thereby preventing the federal courts from issuing advisory opinions." *Laufer v. Naranda Hotels, LLC*, 60 F.4th 156, 161 (4th Cir. 2023) (quoting *Carney v. Adams*, 592 U.S. 53, 58 (2020)). When a dispute does not fit that description, it is considered nonjusticiable, *see Babbitt v. United Farm Workers Nat'l Union*, 442 U.S. 289, 297 (1979), and the federal courts lack subject-matter jurisdiction to decide it. *See Hamilton v. Pallozzi*, 848 F.3d 614, 620–21 (4th Cir. 2017) (citation omitted).

An "essential and unchanging part" of the case-or-controversy limitation is the requirement of standing. *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560 (1992). The standing inquiry is often cast as asking "whether the plaintiff is the proper party to bring th[e] suit." *Raines v. Byrd*, 521 U.S. 811, 818 (1997). By ensuring, among other things, that plaintiffs seek relief from only those acts that affect them in a definite and distinct way, standing doctrine "ensures that federal courts decide only 'the rights of individuals,'" *TransUnion LLC v. Ramirez*, 594 U.S. 413, 424 (2021) (quoting *Marbury v. Madison*, 5 U.S. 137, 170 (1803)), and therefore exercise only "their proper function in a limited and separated government," *id.* (citation omitted). "Such scrutiny is necessary to filter the truly afflicted from the abstractly distressed." *Friends of the Earth, Inc. v. Gaston Copper Recycling Corp.*, 204 F.3d 149, 154 (4th Cir. 2000).

To establish standing, a plaintiff must show (1) a "concrete, particularized, and actual or imminent" injury in fact; (2) that the injury "was likely caused by the defendant"; and (3) that the injury "would likely be redressed by judicial relief." *TransUnion*, 594 U.S. at 423 (citing *Lujan*, 504 U.S. at 560–61). "If the plaintiff does not claim to have suffered an injury that the defendant caused and the court can remedy, there is no case or controversy for the federal court to resolve." *TransUnion*, 594 U.S. at 423 (internal quotation marks omitted) (quoting *Casillas v. Madison Ave. Assocs., Inc.*, 926 F.3d 329, 333 (7th Cir. 2019) (Barrett, J.)).

Of these three elements, injury in fact is the "[f]irst and foremost." *Spokeo, Inc. v. Robins*, 578 U.S. 330, 338–39 (2016) (alteration in original) (quoting *Steel Co. v. Citizens for Better Env't*, 523 U.S. 83, 103 (1998)). Its requirements are more than an "ingenious academic exercise in the conceivable." *See Lujan*, 504 U.S. at 566 (quoting *United States v. Students Challenging Regul. Agency Procs. (SCRAP)*, 412 U.S. 669, 688 (1973)). Instead, they operate to ensure that "the party seeking review [is] [it]self among the injured." *Id.* (quoting *Sierra Club v. Morton*, 405 U.S. 727, 734–35 (1972)). Crucial to this effort is the requirement of an actual or imminent injury, which demands a plaintiff show that they "*ha[ve] been* or *will in fact be* perceptibly harmed" by the acts at issue, not merely that they "can imagine circumstances in which [they] *could be* affected." *See SCRAP*, 412 U.S. at 688–89 (emphasis added).

Similar to but distinct from the actual-or-imminent requirement is the idea that "[s]tanding is not dispensed in gross." *Davis v. FEC*, 554 U.S. 724, 734 (2008) (quoting *Lewis v. Casey*, 518 U.S. 343, 358 n.6 (1996)). Under that precept, a plaintiff must establish standing for each claim they press and for each form of relief they seek. *Id.* (quoting *DaimlerChrysler Corp. v. Cuno*, 547 U.S. 332, 352 (2006)). Assuming causation and redressability are otherwise satisfied, a showing of prior injury supports standing for retrospective relief, while a showing of ongoing or future

injury supports standing for prospective relief.[2] *See Garey v. James S. Farrin, P.C.*, 35 F.4th 917, 922 (4th Cir. 2022); *see also Lewis v. Casey*, 518 U.S. 343, 357 (1996) ("The remedy must of course be limited to the inadequacy that produced the injury in fact that the plaintiff has established." (citation omitted)).

Finally, regardless of the temporal form a plaintiff's injury takes—past, present, or future—it is well established that the injury "must exist at the time [the plaintiff] files her complaint." *E.g.*, *Penegar v. Liberty Mutual Ins. Co.*, 115 F.4th 294, 303 (4th Cir. 2024).

With these basic principles in mind, the Court turns now to how they apply in cases like Plaintiff's. Federal courts have suggested time and again that a failure to apply is fatal to claims that rest on the discriminatory denial of an application. *See, e.g.*, *Moose Lodge No. 107 v. Irvis*, 407 U.S. 163, 167 (1972) ("[I]n this case appellee was not injured by [the defendant's] membership policy since he never sought to become a member."); *S. Blasting Servs., Inc. v. Wilkes County*, 288 F.3d 584, 595 (4th Cir. 2002) ("Here, plaintiffs have never even applied for a permit, much less been denied one. Therefore, they cannot demonstrate an actual injury . . . ."); *Ali v. Hogan*, 26 F.4th 587, 597–99 (4th Cir. 2022); *Byrd v. Loc. Union No. 24, Int'l Bhd. of Elec. Workers*, 375 F. Supp. 545, 558 (D. Md. 1974); *see also Davis v. Tarrant County*, 565 F.3d 214, 220 (5th Cir. 2009) ("In order to satisfy the standing requirement of an 'actual or imminent' injury, a plaintiff generally must submit to the challenged policy before pursuing an action to dispute it.").

But the Supreme Court has also held that failing to apply does not extinguish standing where a plaintiff is or was otherwise "able and ready" to submit. *See, e.g.*, *Carney*, 592 U.S. at 60 (first citing *Gratz v. Bollinger*, 539 U.S. 244, 262 (2003), and then citing *Ne. Fla. Chapter,*

[2] The retrospective-prospective distinction is not coextensive with the actual-imminent distinction, as ongoing injuries are considered actual, not imminent, for purposes of injury in fact. *See Deal v. Mercer Cnty. Bd. of Educ.*, 911 F.3d 183, 188–89 (4th Cir. 2018).

Associated Gen. Contractors of Amer. v. Jacksonville, 508 U.S. 656, 666 (1993)); *see also id.* at 64–65 (citing *Adarand Constructors, Inc. v. Pena*, 515 U.S. 200, 212 (1995)). Far from relaxing Article III's requirements, the able-and-ready principle simply recognizes the commonsense idea that whether an injury is constitutionally cognizable will not ordinarily turn on final-step formalities, such as mailing a cover letter or clicking "submit." *See id.* at 66. Perhaps most notably, the principle leaves open the possibility of standing for those who do not "translate their desire for a job into a formal application" because it "would be merely a 'futile gesture,'" *see id.* (cleaned up) (quoting *Int'l Bhd. of Teamsters v. United States*, 431 U.S. 324, 365–66 (1977))—though, it should be said, the principle is not in terms limited to that group.[3]

Whether someone is "able and ready" to apply is a legal determination, the bare recitation of which is not entitled to an assumption of truth. *See Carney*, 592 U.S. at 60; *Doe v. Sebelius*, 676 F. Supp. 2d 423, 427–28 (D. Md. 2009). And the underlying inquiry is fact intensive. *See, e.g.*, *Carney*, 592 U.S. at 60–66; *Menders v. Loudoun Cnty. Sch. Bd.*, 65 F.4th 157, 163–64 (4th Cir. 2023); *Bridges v. Prince George's County*, BAH-21-1319, 2024 WL 396645, at *5 (D. Md. Feb. 1, 2024). To satisfy it, a plaintiff must *show*—not merely assert—that, at the time of the asserted injury, they were "likely to apply . . . in the reasonably foreseeable future," had it not been

[3] The Court does not adopt Plaintiff's view of the law in this area, which appears to suggest the fact of an application being futile is itself enough to confer standing. (*See* ECF No. 23 at 8–9 (arguing that those "deterred from applying for employment because of the humiliation of certain rejection have standing to pursue employment discrimination letters" from the EEOC, and, by extension, to sue in federal court.).) But for a plaintiff to show standing to sue over the denial of something they never sought, the Supreme Court has been explicit about what is required: "[O]ur cases make clear that [the plaintiff] can show this only if [they were] 'able and ready' to apply." *Carney*, 592 U.S. at 60 (collecting cases). At bottom, the futile-gesture theory is a merits doctrine, not a justiciability doctrine. *See Pinchback v. Armistead Homes Corp.*, 907 F.2d 1447, 1451 (4th Cir. 1990) (collecting cases "demonstrat[ing] how integral to fair employment law the futile gesture idea has become"); *Teamsters*, 431 U.S. at 364–66 (announcing the theory after noting the broad scope of Title VII, with no mention of standing or justiciability). And in the context of the standing inquiry, the doctrine means only that a lack of an application will not necessarily *destroy* standing—not, as Plaintiff argues, that it would somehow *suffice* for standing. *See, e.g.*, *Bridges v. Prince George's County*, Civ. No. BAH-21-1319, 2024 WL 396645, at *6 (D. Md. Feb. 1, 2024); *Jensen v. Md. Cannabis Admin.*, 719 F. Supp. 3d 466, 475 (D. Md. 2024); *see also Carney*, 592 U.S. at 66 (noting that its decision—that a plaintiff lacked standing in part because he never applied for a job—"do[es] not . . . depart from or modify" various employment precedents, like *Teamsters*).

for the allegedly discriminatory restriction. *See Carney*, 592 U.S. at 60, 63. Relevant factors include whether a plaintiff contemporaneously expressed an intent to apply, *id.* at 60–61; *Bridges*, 2024 WL 396645, at *6; whether they applied for or took similar opportunities in the past, *Carney*, 592 U.S. at 61; *Adarand*, 515 U.S. at 211–12; *Ne. Fla. Chapter*, 508 U.S. at 668; *Gratz*, 539 U.S. at 262; *Bridges*, 2024 WL 396645, at *6; *Jensen v. Md. Cannabis Admin.*, 719 F. Supp. 3d 466, 475 (D. Md. 2024); whether they know, or have attempted to learn, of similar opportunities in the present, *see Carney*, 592 U.S. at 62–63; *Ne. Fla. Chapter*, 508 U.S. at 668; *Menders*, 65 F.4th at 163; whether they sought an application or took other concrete steps to prepare or submit one, *see Menders*, 65 F.4th at 163; *Bridges*, 2024 WL 396645, at *6; and whether their actions suggest "a desire to vindicate [their] view of the law" rather than pursue the underlying opportunity, *see Carney*, 592 U.S. at 62. Considerations like these are what distinguish a plaintiff with standing "from a general population of individuals affected in the abstract by the [restriction] [the plaintiff] attacks." *See id.* at 64.

The result of all this is that Plaintiff faces an uphill climb to plead an actual or imminent injury—a climb she ultimately fails to summit. To start, she never applied to the LCLD position. (ECF No. 1 ¶¶ 21–22.) Nor does she allege facts enough to support an inference that she was ever "able and ready" to do so. She says nothing about any steps she took toward applying, whether that be inquiring further about the position's duties or qualifications, preparing an application, or thinking about what an application might look like. She reveals no history of applying to similar positions in the past. And she does not say whether she applied to, considered, or even sought other such positions at the time she saw the posting at issue. Instead, she says only that *that* job "immediately caught [her] attention," (ECF No. 23-3 ¶ 3), that she frequently encountered disadvantaged and vulnerable groups in her prior activities and employment, (*see id.* ¶ 4), that she

took a "real and active interest" in the position, (ECF No. 1 ¶ 17), and, by implication, that she thought about it at least long enough to decide she did not meet its criteria, (*see id.* ¶¶ 20–22).

The law is clear: a mere "profession of an intent" to do something has never been enough for standing. *See Lujan*, 504 U.S. at 564 (cleaned up); *Carney*, 592 U.S. at 64. "Such 'some day' intentions—without any description of concrete plans, or indeed even any specification of *when* the some day will be—do not support a finding of the 'actual or imminent' injury that [the law] require[s]." *Lujan*, 504 U.S. at 564 (emphasis in original). Yet Plaintiff's unadorned assertion of a "real and active *interest*" amounts to something even less than that.[4]

This paucity of allegations as to Plaintiff's intent doubly imperils her prayer for prospective relief. It is one thing to show she was "able and ready" to apply in or around February 2021, when she first encountered the allegedly discriminatory barrier—a showing she already fails to make. It is another thing entirely to show she remained able and ready to apply in May 2024, over three years later, when she filed her Complaint. For one, she does not allege the posting was still up at that time, and it strains credulity to think it would have been. For another, by the time she filed

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[4] Even if it were enough, for "able and ready" purposes, for Plaintiff simply to show she was interested in the position, she would still fail to establish standing, her explanation as to *why* she was interested being essentially self-defeating.

In short, Plaintiff's explanation of the position's appeal is fundamentally at odds with what the posting itself says the job offers. The lodestar of Plaintiff's "real and active interest," (ECF No. 1 ¶ 17), is her professed desire to "acquire the legal skills needed to be an effective advocate for minority and other disadvantaged groups," (ECF No. 23-3 ¶ 3), and "fight[] to protect non-heterosexual individuals from discrimination," (*id.* ¶ 6). But nothing in the posting suggests the position would even remotely further those goals. Indeed, beyond the position's title ("Leadership Council on Legal Diversity (LCLD) 1L Scholar[]") and the language over which Plaintiff has sued (requiring "an ethnically or culturally diverse background or . . . member[ship] [in] the LGBT community), the posting contains no mention of diversity at all, much less a mention of an opportunity for public-interest advocacy on behalf of the disadvantaged. (*See* ECF No. 1, Ex. A, at 9.) Without more, the posting cannot be read as promoting anything other than a chance for underrepresented groups to get their foot in the door of the corporate legal world. (*See id.*) And because this would not give Plaintiff the exposure she says she desired, her explanation of interest—and in particular, her belief the position "could advance [her] career in ways [she] had always dreamed of," (*see* ECF No. 23-3 ¶ 7)—is rendered implausible on its face.

Without a credible assertion of the job's appeal, however, the pleadings do not permit a plausible inference of Plaintiff's ability and readiness to apply. This is because a court need not credit any allegation that conflicts with a document incorporated into the pleadings. *See Goines v. Valley Cmty. Servs. Bd.*, 822 F.3d 159, 167 (4th Cir. 2016). Logically, this is also true for secondary allegations and inferences that flow crucially from the primary, conflicting statement. *See id.* Given that Plaintiff's sole explanation of interest plainly conflicts with the posting itself, the Court does not credit that explanation, nor the crucial allegation—that she actually *had* an interest—that flows therefrom.

this action, Plaintiff had graduated from law school and enrolled as a member of this State's bar. She supplies no reason to believe she would have remained interested in, let alone eligible for, an internship for first-year law students, and the Court could not responsibly draw such an inference. The result is that even if Plaintiff *had* at some point suffered a constitutionally cognizable injury—again, something she has not shown—there is no indication her dispute would have remained live enough at the time of filing to support standing to seek relief from future harm.[5]

In the end, Plaintiff has not satisfactorily pled she was "able and ready" to apply for the LCLD position "in the reasonably imminent future," *see Carney*, 592 U.S. at 64—not around the time she saw the posting, let alone at the time of filing. On the contrary, "against the context of a record that shows nothing more than an abstract generalized grievance," she offers even less than a "bare statement of intent." *See id.* at 65–66. That is not enough to show an injury in fact, and it is therefore inadequate to invoke the jurisdiction of the federal courts. *See id.* at 64–66.

IV. CONCLUSION

Plaintiff has not sufficiently alleged a real intent to apply to the LCLD position. As a result, her claims "sound much more like general disagreements" with Defendant's hiring practices than they do incursions on her individual rights. *See Menders*, 65 F.4th at 164. Disagreements of this type are fundamentally "concern[s] about policy." *See id.* And whether or not those concerns are legitimate, they "should be made to policymakers, not judges." *Id.*

Having not shown an injury in fact, Plaintiff is without standing to press her claims, and this Court is without power to adjudicate them.[6] They must be dismissed.

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[5] For the same reasons, the Court observes, without deciding, that Plaintiff's claims for prospective relief are almost certainly moot, having not presented a live issue even at the time they were filed. *See Powell v. McCormack*, 395 U.S. 486, 496–97 (1969) (citation omitted).

[6] For this reason, the Court need not—and, indeed, may not—consider Defendant's request for dismissal under Rule 12(b)(6), which attacks the basic sufficiency of Plaintiff's allegations on the merits.

DATED this 24 day of February, 2025.

BY THE COURT:

James K. Bredar
United States District Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SARAH SPITALNICK,	*	
Plaintiff,	*	
v.	*	**Civ. No. JKB-24-1367**
KING & SPALDING, LLP,	*	
Defendant.	*	

* * * * * * * * * * * *

ORDER

For the reasons set forth in the foregoing Memorandum, it is ORDERED that:

1. Defendant's Motion to Dismiss, (ECF No. 13), is GRANTED.
2. The Clerk is DIRECTED to CLOSE this case.

DATED this 24 day of February, 2025.

BY THE COURT:

James K. Bredar

James K. Bredar
United States District Judge