

MINNESOTA

ISSUE II 2025

Defense



DELAY, DENY, DEFEND?
COMBATting: ANTI-CORPORATE BIAS
DURING A JURY TRIAL

INSPIRING THE NEXT GENERATION:
HOW TWO HIGH SCHOOL STUDENTS
ARE BUILDING A PIPELINE FOR
WOMEN IN LAW

THE 8TH CIRCUIT'S NEW COURSE OF
PROCEEDINGS TEST FOR § 1983 CASES

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A LEGACY OF FRIENDSHIPS

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Stephanie Angolkar
9321 Ensign Ave S
Bloomington, MN 55438
(952) 548-7216

VICE-PRESIDENT

Cally Kjellberg-Nelson
1740 West St. Germain, Ste 101
St. Cloud, MN 56301
(320) 200-4928

TREASURER

Rachel Beauchamp
12800 Whitewater Drive, Suite 200
Minnetonka, MN 55343
(952) 525-6959

SECRETARY

Shayne Hamann
500 Young Quilin Building
Minneapolis MN

PAST PRESIDENT

Elizabeth Sorenson Brotten
250 Marquette Ave S, Ste 1200
Minneapolis, MN 55401
(612) 216-0265

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EXECUTIVE DIRECTOR

Lisa Mortier
9505 Copley Dr.
Indianapolis, IN 46260
(612) 750-8606

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9505 Copley Dr., Indianapolis, IN 46260

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ARTICLES FROM PAST ISSUES

Members wishing to receive copies of articles from past issues of *Minnesota Defense* should forward a check made payable to the Minnesota Defense Lawyers Association in the amount of \$5 for postage and handling. In addition to the articles listed below, articles dating back to Fall '82 are available. Direct orders and inquiries to the MDLA office, director@mdla.org.

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JOIN A COMMITTEE

MDLA committees provide great opportunities for learning and discussion of issues and topics of concern with other members in similar practices. Activity in committees can vary from planning CLE programs, to working on legislation, to informal gatherings that discuss updated practice information or changes in the law. Serving on a committee is one of the best ways to become actively involved in the organization and increase the value of your membership.

If you would like to join a committee's distribution list, please update your member profile on mdla.org specifying the appropriate committee under the "Practice Type" section. You will be automatically added to the distribution list.

To learn more about an MDLA committee, please visit www.mdla.org. Meeting times and dates for each committee are listed online.

Committees available include:

- | | |
|---------------------------|-------------------------------------|
| • Amicus Curiae | • Membership Committee |
| • Construction Law | • Medical Liability and Health Care |
| • Diversity | • New Lawyers Committee |
| • Editorial | • Motor Vehicle Accident |
| • Employment Law | • Products Liability |
| • Events Committee | • Retail and Hospitality |
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RETAIL AND HOSPITALITY

Focused on the defense of retailers, restaurants, and hospitality businesses against suits for:

- Minnesota Civil Damage Act
- Premises liability
- Falling merchandise
- Negligent security
- Food-borne illnesses
- Americans with Disabilities Act
- Minnesota Human Rights Act

If you would like to participate in planning events for this committee, please contact Lisa Mortier, MDLA Executive Director

THE PRESIDENT'S COLUMN



ELIZABETH SORENSON BROTTEN

FOLEY MANSFIELD

The Power Of Connection

In early May, MDLA Executive Director Lisa Mortier, DRI State Representative Tony Novak, and I traveled to Nashville for DRI's North Central Regional Meeting. It was a chance to collaborate with leaders from Canada and the Central Region on how to strengthen our State and Local Defense Organizations ("SLDOs"), like MDLA. We had an opportunity to hear what other defense organizations are doing to attract and engage members. A panel of lawyers new to the defense bar also provided insight on what has attracted them to not only join DRI and their SLDOs, but to engage. We also heard from our DRI leaders on innovative ways DRI is supporting the defense bar, including through new legislative and policy initiatives. For example, the State Legislation and Rules Task Force assists SLDOs concerned about a legislative or rule issue in their state. The task force can assist in a variety of ways, such as shar-ing information about the issue from other jurisdictions or by providing comments supporting the SLDO positions to legislative committees or rule-making bodies. The task force also asserts SLDOs to issues arising in one jurisdiction, before they become problematic in another jurisdiction. If you have questions about how the task force can assist, please contact Minnesota's task force representative, Jason Hill. Of course, we also had an opportunity to connect socially, over meals and through music on Broadway. DRI's Regional Meetings are always informative and if you are interested in MDLA or DRI leadership, I encourage you to attend in 2026!

It was my pleasure to continue the connection opportunities MDLA offers at the Trial Techniques Seminar ("TTS") in August! We came together in Duluth to celebrate "A Legacy of Advocacy." I enjoyed celebrating MDLA's rich history

and strong leadership at the President's Reception and Dinner at the historic Kitchi Gammi Club. Vice President Stephanie Angolkar planned and hosted an informative and entertaining slate of CLEs for us on Friday. We gathered at our Annual Meeting Lunch and Awards on Friday, where I recognized our outgoing leaders' accomplishments, announced our new board and executive committee members, and celebrated our Presidents' Award and Deb Oberlander award winners, as well as all of our members who have contributed with amicus briefs this year. Friday even-ing, we experienced the historical Glensheen Mansion on the shores of Lake Superior for dinner, tours, and lawn games. Touring the mansion was a stunning view into the past on an amazingly beautiful evening.

We also had the opportunity to make a difference in the Duluth area as a new school year begins! We again supported Companies to Classrooms (C2C), which operates a free store for teachers to get necessary school supplies for their classrooms. One of my favorite past TTS moments was seeing the retired teachers arrive at the DECC to pick up the supplies MDLA members and firms had donated, only to break down in tears as they saw the number of items we had collected.

It was my pleasure and honor to pass the gavel to incoming President Stephanie Angolkar.

SAVE THE DATES

January 23-25, 2026 - Mid-Winter Conference - Grandview Lodge - Nisswa, MN

May 20, 2026 - Diversity Seminar

July 30, 2026 - Women in the Law Breakfast

2025 TTS Recap by Cally Kjellberg-Nelson

The annual Trial Techniques Seminar (“TTS”) was held August 15-16 at the DECC in Duluth. The conference began on Thursday after the MDLA Board Meeting with the Welcome Reception at the DECC overlooking Lake Superior. The President’s Reception and Dinner was held that same evening at the Kitchi Gammi Club where Executive Committee members, Board members, speakers, and past Presidents all gathered to break bread and share stories. Late Past President Rebecca Egge Moos was honored and her contributions to the legal profession, in general, and MDLA, in particular, were recognized. Several seminar attendees who did not attend the President’s Reception and Dinner, enjoyed the Dine Arounds in Canal Park.

The conference sessions kicked off with welcoming remarks from the 2025 TTS organizer Stephanie Angolkar. On Friday, attendees heard entertaining presentations regarding settlement strategies, cross examination techniques, and the importance of civility in the legal profession. The Friday conference sessions also included a very interesting presentation about video surveillance.

The MDLA Annual Meeting and Lunch was also held on Friday between the conference sessions. Outgoing President Liz Brotten presented the Amicus brief awards and the Deb Oberlander Award, which recognizes an outstanding new attorney. This year’s recipient was Ben Anderson. In addition, Liz presented the President’s Award to Tessa McEllistrom and Hilary Fox in recognition of their significant contributions to MDLA in re-organizing the MDLA Trial Academy. Past President Tammy Reno was also recognized for her contributions to MDLA, particularly in stepping in to serve as President for another year after the untimely passing of Brendan Tupa. The new executive committee was elected and installed and includes President Stephanie Angolkar, Vice President Cally Kjellberg-Nelson, Treasurer Rachel Beauchamp, Secretary Shayne Hamann, and Past President Liz Brotten. New members joining the MDLA Board of Directors include Sean Kelly, Andrew Wolf, and Samantha Flipp. The Annual Meeting ended with remarks from President Stephanie Angolkar, who stressed the importance of legacy in our profession and within MDLA.

Following the conference on Friday, attendees explored Canal Park and Duluth and then ventured to the Glensheen Mansion for an evening of tours, dinner, and socializing.

On Saturday, the conference continued with a session about understanding and addressing trauma in the legal profession. Attendees engaged in an active discussion regarding succession planning, mentorship, and law firm legacy. Finally, attendees learned about different aspects of trial work from the first and second chair perspectives.

Throughout TTS, there were numerous committee shoutouts, which allowed attendees to recognize the Chairs of the various Committees and highlight the important

work of the committees. MDLA continues to work to improve the strength of its various committees through ongoing quality programming and active participation by members.

In keeping with the tradition of public service, MDLA once again collected donations of school supplies and monetary donations for its partnership with Companies to Classrooms in Duluth. Companies to Classrooms continues to express its heartfelt thank you to MDLA for donating each year.

Overall, in keeping with tradition, TTS was a fantastic event with great speakers and many opportunities for member interactions and camaraderie. Thank you to Stephanie Angolkar for organizing a great conference and,



DELAY, DENY, DEFEND?

COMBATTING: ANTI-CORPORATE BIAS DURING A JURY TRIAL

BY ANGELA NELSON

Unless you have blacked out any news, you have heard of the killing of the CEO of United Health with a bullet with the phrase “Delay, Deny, Depose.” There has been a backlash against insurance companies and large corporations due to perceived injustices perpetrated by entities with more monetary and political power than individuals. Plaintiffs’ attorneys regularly and deliberately use the public’s feelings about large corporations to argue for larger verdicts when an insurance company and/or a large corporation is a named defendant. The purpose of this article is to get you thinking of what you can do to combat bias against your large corporate defendant in a jury trial. If we lived in an ideal world, defense lawyers would be able to argue that insurance rates go up when enormous non-proportional awards are made, if every claimant received whatever amounts they demanded, that there is widespread systemic fraud by claimants, and that many thousands of claims are paid without litigation. But alas we are not. Thus, it is necessary for defense attorneys to question juries and anchor them to award only appropriate compensatory damages in other ways without explicitly stating the underlying message. This can be done at various stages of the trial and will be discussed below with tips. As a reminder, you know your case better than anyone so not all the suggestions will work for every case.

Motions in Limine

To prevent a plaintiff’s attorney from making emotion-based corporate entity arguments, filing motions in limine to prevent those comments/arguments is important; it can limit the arguments in general as well as preventing surprise and addressing concerns in advance to ensure the issues are on the judge’s radar. In addition, motions in limine are helpful in drafting your trial roadmap of opening, direct, cross and closing. Some motions in limine that can be included to limit corporate bias include:

1. Any and all testimony, comments, arguments, references of bad faith and/or fiduciary duty shall be prohibited. This shall include any and all jury instructions related to the same.

2. Statements, references or arguments that a defendant is in “breach of contract.” This includes any and all jury instructions related to breach of contract.

3. Attempts by Plaintiff to demonize or vilify Defendant on an emotional level rather than factually specific and legally based arguments such as statements that a defendant “won’t pay what they owe.”

4. Arguments or statements that a defendant “refuses to admit” any of the elements of the plaintiff’s claim (“we’ve sent them everything, they refuse to pay it” or statements like “Make Plaintiff jump through hoops to needlessly delay.”)

5. Arguments and references to a claim’s handling, including direct or indirect references to all settlement demands, offers, and communications between the parties during claims handling or settlement discussions (“let me tell you why we are here”).

6. Arguments that a plaintiff or her family members “paid her premiums” as a basis to a claim they are owed money versus trying the actual factual and legal claims in issue.

7. Evidence or statements regarding a defendant having insurance or any insurance limits, or its financial condition.

Courthouse Etiquette

From the moment you arrive at the courthouse for trial, assume jurors are around you – seeing you, hearing you, and remembering your words and actions. Thus, from the moment your client pulls into the parking lot for trial until the moment they get home, they should be aware that a juror may be watching – even honking at another car on the road near the courthouse could be an interaction with a juror. Therefore, it is recommended that the client or claims representatives not drive vehicles to the courthouse with corporate or insurance branding. In addition, the client



Angela Nelson is a litigation attorney with Progressive. She is accomplished in developing comprehensive strategy through legal research and fact investigation. She is known to obtain results through oral and written advocacy skills.

or claims representative should not wear any identifying clothing (such as carrying a backpack or briefcase with the insurance company or corporate name or logo on it while attending the trial as an insurer representative did recently in a Hennepin County trial). And, of course, it is essential not to discuss the case anywhere in public areas of the courthouse in any manner.

Corporate Representative/or Designee

Use care in choosing a *good* corporate representative or designee. The corporate representative will act as the face and voice of the company during trial, and their demeanor and testimony can significantly impact how the jury perceives the corporation. It is important that the corporate representative be present during the entire trial to demonstrate the corporation's investment in the outcome of the case. They should sit at the defense table with you. The corporate representative should be someone a jury will find likable, relatable, and credible. When choosing a corporate representative, the person should be able to show empathy to a plaintiff (while not necessarily admitting liability), to show confidence and emotional poise (remaining calm under pressure and not be rattled under cross-examination), and to be knowledgeable regarding the corporation and about the case.

Humanizing a Corporate Client

Choosing a good corporate representative is the first step in humanizing a corporation client. A jury will like a corporation more if the defendant can show that people are more important than profits. Emphasize the people who work at the company and highlight any personal stories that you can have admitted at the trial. Show how the company and their employees contribute to the community through charitable donations and showcasing volunteer and community outreach programs. If the corporation has an interesting history, positive mission statement or motto, share it with the jury in an engaging way. Share that the corporation employs people who work and live in the jury's community. Share the corporation's dedication to safety and training of its employees.

Voire Dire

Generally, you should include voire dire that addresses relevant biases or opinions. This prepares jurors to understand the case is not as black and white as a plaintiff would like them to believe. Some potential voire dire starting questions are:

- Have you ever boycotted a company for their policies and/or politics? What can you tell me about that?
- Do any of you agree with the position that a person claiming injury should have medical bills paid for no matter what the evidence might show?

- How do you feel about awarding someone money for an injury?
- What organizations are you a member of?
- What do you do for hobbies?
- Does anyone have any bumper stickers on their car?
 - o If so, what are they of?
 - o If not, what would they be if you had to pick one?
- Where do you get your news?
- How do you feel about large corporations/insurance companies in general?
- Have you ever had a dispute with a large corporation or insurance company? How was that resolved?
- Can you hold both individuals and corporations to the same legal standard in this case?
- If the evidence supports the corporation, could you rule in their favor even if you personally dislike large corporations?
- Thank you for sharing that. Despite your views, do you think you could listen to the evidence and apply the law as the judge gives it to you, even if the party is a corporation?
- Consider using a hypothetical to see how a juror would respond.

In today's political situation, where people get their news, bumper stickers and hobbies can be very telling of what a potential juror's views may be. Like any voir dire questions, the follow up discussions with the answering juror, and other jurors, are important. The additional questions may result in the need to rehabilitate and/or grounds for a strike with cause.

Opening

In your opening argument it is important to set the scene for your trial theme and message. What is your theory of defense? Is it that there is no liability? Is there a dispute about the value of the damages? For both liability and damages disputes, we think it is essential to include in the opening who has the burden of proof. Make that clear to the jury. Similarly, you want to send the message that the jury needs to decide the case on the evidence--not feelings. As such, repeat the phrase, "the evidence will show" throughout your opening. During your closing also highlight any inconsistencies in Plaintiff's case.

If there is a dispute about the value of damages, a defense attorney should use their opening to highlight the evidence that supports your valuation. Strategies that may be helpful:

- Not denying that she was injured or owe the money, but asking “what is the evidence?”
- Use buzz words to describe damages as “fair and reasonable.” An example of this is:
 - o “We are here because there is a dispute about the amount of money Plaintiff should receive. The parties disagree about the nature and value of the injury. The central question for you to decide after hearing all the evidence is: What is a fair and reasonable amount of compensation? Defendant is not saying that Plaintiff is entitled to zero. What is ‘fair and reasonable’ value is based upon evidence. The evidence that you will hear include?”

If liability is at issue, we recommend focusing on the individual employee of the company and how their behavior is at issue and that the employee is human too. It is important to state that a company is made of people. The employees of the company work hard, take pride in doing their work safely and want you to listen to them tell their version of what happened. Telling the defense story early is important to set the scene. Therefore, lead with your strongest liability arguments. Then follow it up with the evidence of what Plaintiff did wrong or failed to do.

If Plaintiff argues that the case is about “the little plaintiff” against the “big bad goliath” corporation, change the narrative to how “this is about two drivers on the road and one of them made a mistake. The evidence will show that the mistake was not Defendant’s.” When you are drafting your opening, also consider the tone. The jury may be put off if the defense attorney is immediately defensive. Rather focus on Defendant’s version of events or valuation. This is the story that the evidence will support.

Closing Arguments

For closing arguments, focus on the same theme as your opening. You want to make sure that everything you stated in your opening you have proven and can reiterate in your closing. Other areas of focus for your closing are:

- Corporations are held to the same standard as individuals. An employee for a large corporation has no more duty to drive carefully than when they are in their private lives. The corporation is not held to a higher standard of what they should have done. Defendant’s policies are not on trial here. If Defendant does have a higher standard of care, or has strict regulations, then focus on how Defendant complied with those standards.
- Anchoring has become a hot topic in legal circles.

Some attorneys do not think it is beneficial, but when you are combating anti-business bias anchoring is important to help reinforce that the defendant is being fair and reasonable. Use the verdict slip to explain your recommended damages and then also focus on how the evidence supports this determination. This is where emotion and unfairness are combatted by giving a reasonable value for injuries. Even if there is a liability defense, still argue what the value of the injuries/damages are worth. By using the evidence to support damages, the anchored damage amount will not seem arbitrary. This will again reinforce the defendant’s theme of being reasonable and fair. In terms of future damages, this can be “X” amount of money to help the plaintiff obtain “Y” medical treatment. By filling out the jury verdict slip, Defendant is helping the jury know what their job is in the jury room, and you are also keeping them engaged.

- As the jury, they should focus on law, justice, and the facts. The defendant should not be a scapegoat for feelings. Under the law it is the responsibility of the jury to assess the questions based upon facts/evidence, not emotion. This is a good place to tie in the burden of proof. Look back at the evidence and reiterate the evidence in your favor and the lack of evidence in the plaintiff’s favor. If the evidence does not support the plaintiff’s case then it is okay to come to a defense verdict.

- Special consideration needs to be made if the plaintiff is a very sympathetic witness. This can take many forms, including the nature of the plaintiff’s injuries, their likeability and charm, and other indefinable characteristics. As the corporate defendant, you want to make sure that you are not reaching to discredit the plaintiff. The concern with attempting to discredit the plaintiff is that jurors may view the corporate defendant as desperate and it reinforces the stereotype of a corporate defendant saying anything and everything to avoid accountability. An angry jury is likely to award higher damages rather than making the liability and damages findings you desire.

Final Comments

Throughout your trial, it is essential that you, as the attorney, are seen to be credible. Therefore, do not fake sympathy and, if you are sympathetic to the plaintiff, do not then attack plaintiff’s credibility or blame them. Those actions will lose you jurors. Throughout the trial, maintain the consistent message and theme and use your own credibility to bolster your client’s and fight any corporate bias to ensure a fair and just outcome.

Thank You

for your service

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Commercial Transportation
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Insurance Coverage
Professional Liability
Medical Malpractice
Product Liability
Subrogation
Workers' Compensation



Shayne Hamann

Arthur Chapman is proud to have a shareholder on the MDLA Board of Directors. Shayne focuses her practice in the areas of automobile and general liability litigation, No-Fault and insurance coverage.

The attorneys of Arthur, Chapman, Kettering, Smetak & Pikala, P.A. deliver top-tier legal expertise with down-to-earth character and values, without ego and pretense. Clients call on Arthur Chapman attorneys for litigation counsel in the areas of civil and business litigation.



Minneapolis, MN
500 Young Quinlan Building
81 South Ninth Street
Minneapolis, MN 55402

ArthurChapman.com
1-800-916-9262

Hudson, WI
811 1st Street
Suite 201
Hudson, WI 54016

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THE 8TH CIRCUIT'S NEW COURSE OF PROCEEDINGS TEST FOR § 1983 CASES

BY JULIA C. KELLY

In February 2025, in the case of *S.A.A. v. Geisler*, 127 F.4th 1133 (8th Cir. 2025), the Eighth Circuit abandoned its long-established “clear statement rule” in favor of a “course of proceedings test” for determining the capacity in which a § 1983 defendant is sued. This article provides a summary of the case, discussion of the new rule, and its potential impact.

Overview of 42 U.S.C. § 1983 litigation.

Under 42 U.S.C. § 1983, private citizens can enforce or seek redress for violations of their federal constitutional rights against municipalities, as well as state and local government employees acting under the color of state law. There is no respondent superior or vicarious liability under § 1983, and as such, a plaintiff must allege that an individual government official acting under the color of law violated the plaintiff’s constitutional rights. This is why in § 1983 litigation, an individual defendant must be personally named in the suit. That is, an individual capacity claim under § 1983 against a public employee is an action against that official personally, though typically the employing entity provides indemnification. The lack of vicarious liability in § 1983 litigation makes it essential for a plaintiff to allege specific facts in the initial pleading showing an individual government official acting under the color of law violated the plaintiff’s constitutional rights.

On the other hand, an official capacity claim under § 1983 is equivalent to a claim against a government entity or municipality. That is, where an individual government employee is named in his or her official capacity in a § 1983 suit, it means the employee’s government entity is truly the subject of the suit. Official capacity suits require the plaintiff to show the constitutional violation was caused by a policy, practice, or custom. This represents a drastically different type of § 1983 lawsuit compared to an individual capacity claim, though both individual and official capacity claims can be brought in the same suit where the facts support both. The differences in these two kinds of § 1983 cases led to the development of the clear statement rule. Until the Eighth Circuit’s recent decision in *S.A.A. v. Geisler*, the long-established case law required a plaintiff to specify the § 1983 suit was against an individual government employee in his personal capacity else it be presumed to be a case against the

government employer, which is often considered a more difficult legal standard.

Background of *S.A.A. v. Geisler*.

In January 2020, Officer Geisler and other officers executed a search warrant on S.A.A.’s home. When the officers knocked, S.A.A.’s husband fired gunshots claiming he did not know who was banging on the door. No one was injured, but both S.A.A. and her husband were ordered to exit the house with their hands up and to get on the ground. S.A.A. alleged that when she exited the house, Officer Geisler threw her to the ground and punched her in the back.

S.A.A. brought claims under 42 U.S.C. § 1983 alleging Officer Geisler violated her Fourth Amendment rights by using excessive force and making a false arrest. The complaint, both as filed and as amended, did not specify Officer Geisler was being sued in her individual capacity. That is, the complaint was silent as to whether the claims against Officer Geisler were being brought against her in her individual or her official capacity. Interestingly, other law enforcement officers named in this suit as defendants were specifically sued in their individual capacities.

Officer Geisler eventually moved for summary judgment arguing that under the Eighth Circuit’s clear statement rule, S.A.A. did not sue her in an individual capacity. The clear statement rule stated where a plaintiff’s complaint is silent about the capacity in which she is suing the defendant, the complaint is interpreted as including *only* official capacity claims. At summary judgment, S.A.A. argued she had intended to bring individual capacity claims and conceded she did not have sufficient evidence to maintain an official capacity claim against Officer Geisler. Under the clear statement rule, the district court granted summary judgment in favor of Officer Geisler. On appeal, a panel of three at the Eighth Circuit affirmed the dismissal pursuant to the clear statement rule, which had long been precedent. However, S.A.A. successfully petitioned for a rehearing en banc arguing the rule should be changed.



Litigation Attorney for the League of Minnesota Cities. Julia attended William Mitchell College of Law in St. Paul and then served 9 years in the United States Army as a Judge Advocate. In 2020, she returned to Minnesota and joined Iverson Reuvers working on defense of municipal liability claims and civil rights lawsuits. In 2024, she joined the League of Minnesota Cities as a litigation attorney and continues to defend cities in civil litigation.

Clear Statement Rule.

For decades, the Eighth Circuit relied upon the clear statement rule requiring plaintiffs to specify in the complaint whether the suit is intended against each defendant in an individual or official capacity, or both. *Nix v. Norman*, 879 F.2d 429, 431 (8th Cir. 1989). In 1995, the Eighth Circuit in *Egerdahl v. Hibbing Cmty. Coll.* solidified the rule stating where a complaint is silent about capacity, it will be interpreted as an official capacity claim only. *Egerdahl v. Hibbing Cmty. Coll.*, 72 F.3d 615, 619 (8th Cir. 1995) (citing *Nix v. Norman*, 879 F.2d 429, 431 (8th Cir. 1989); *Baker v. Chisom*, 501 F.3d 920, 923 (8th Cir. 2007)). Clear and early notice of the potential for personal liability was the name of the game. And all it took was including the phrase “individual capacity” when describing the claim against a government employee. For years this clear statement rule was a tool used by both municipal defense attorneys and the judiciary to identify, narrow, and even dismiss, § 1983 claims. The rule was generally considered easy to understand and follow. The district court commented in *S.A.A v. Geisler* that even pro se plaintiffs understood it. By comparison, and in recognition of the clear pleading requirements, the Eastern District of Missouri website provides a “Prisoner Civil Rights Complaint” form, which includes boxes a plaintiff may check to specify an official or personal capacity claim, or both. (*Prisoner Civil Rights Compl. Under 42 U.S.C. § 1983*, <https://www.moed.uscourts.gov/sites/moed/files/documents/forms/moed-0036.pdf>).

Identifying the capacity at the initial pleading stage was also considered harmonious with the concept of qualified immunity. Qualified immunity shields a government official from liability unless the official’s conduct violates clearly established statutory or constitutional rights of which a reasonable person would have known. Qualified immunity is immunity from suit, and not just from trial, and questions of immunity should be resolved at the earliest possible stage in litigation. Thus, knowing the capacity at the beginning was vital to this defense strategy.

Yet, the Eighth Circuit’s clear statement rule was unique compared to other circuits. It was argued this rule’s rigidity effectively heightened the pleading requirements. Fed. R. Civ. P. 8(a)(2) calls for a short and plain statement of the claim showing the pleader is entitled to relief and does not countenance dismissal for imperfect statement of the legal theory. That is, civil cases should not turn on technicalities. *Johnson v. City of Shelby*, 574 U.S. 10, 11 (2014). Ultimately, in *S.A.A. v. Geisler*, the Eighth Circuit decided to abandon the clear statement rule in favor of a course of proceedings test.

Course of Proceedings Test.

After the Supreme Court’s 1985 decision in *Kentucky v. Graham*, 473 U.S. 159, other federal circuits adopted a course of proceedings test to evaluate whether a § 1983 defendant

is sued in an individual or official capacity where the complaint is not explicit. Under this test, the fundamental question is whether the course of proceedings has put the defendant on notice that he or she is being sued in an individual capacity and that personal liability is at stake. *S.A.A v. Geisler*, 127 F.4th 1133, 1139 (8th Cir. 2025). A court may consider various factors, including how early in the litigation the plaintiff first specified an individual capacity claim, whether the plaintiff seeks punitive damages, and whether the defendant has raised a qualified immunity defense. No single factor is dispositive. The question is whether the defendant is on notice his or her personal liability is at risk.

For example, an early indication of personal liability may be related to service. Arguably, if a plaintiff personally serves the summons and complaint upon a named government employee, this could be considered as an intent to sue that employee in an individual capacity. On the other hand, if a plaintiff instead only serves the government entity, this might weigh in favor of finding only official capacity claims.

Analyzing the nature of the claims would be the next necessary step. For example, where the allegations are that the government employee acted in accordance with a government policy or custom, it would signal to official capacity. On the other hand, a request for punitive damages indicates individual capacity because punitive damages are not available against government employees sued in an official capacity. Further, an intent to sue the employee individually may also be inferred where the plaintiff names a government actor’s entity as a separate defendant. *Adaway v. Precythe*, No. 4:23-cv-01660-SPM, 2025 WL 1078586, at *2 (E.D. Mo. Apr. 9, 2025).

Finally, another factor is whether a defendant pleaded qualified immunity. Where a defendant declines to raise qualified immunity, it is suggested the defendant does not appreciate the potential for personal liability. The problem with this assumption is defendants tend to be overinclusive with their affirmative defenses in responsive pleadings. Yet, defendants are now bound to include qualified immunity as an affirmative defense to avoid waiving it should the course of proceedings test later turn against their favor. Few defense counsel are likely to recommend jeopardizing the ability to argue for qualified immunity.

This test is only applicable where a complaint does not explicitly state the capacity in which a defendant is sued. That is, an express designation that a plaintiff is suing the defendant in an official capacity only forecloses recovery of personal liability damages. *Reynolds v. Cook*, No. 24-1618, 2025 WL 670428, at *1 (8th Cir. Mar. 3, 2025).

This new rule may not result in an immediate change in the pleading trends from pro se plaintiffs. The prior clear statement rule was widely understood. Over time, we

may see more ambiguous pleadings given the loss of this required clarity. This may result in increased litigation costs and certainly a change in defense strategy. Indeed, the clear statement rule often provided a simple yet fatal attack upon poorly pleaded claims. However, now individual capacity claims will more often survive where the complaint is ambiguous. Particularly in the case of pro se plaintiffs, courts are instructed to liberally construe complaints filed by laypeople. *Estelle v. Gamble*, 429 U.S. 97, 106 (1976). If the essence of an allegation is discernible, the complaint should be construed in a way permitting the layperson's claim within the proper legal framework. *Solomon v. Petray*, 795 F.3d 777, 787 (8th Cir. 2015).

The caselaw is developing slowly, but so far, where the complaint is silent as to capacity, an analysis of the factors under the course of proceedings test appears to favor finding individual capacity claims. Government entities and their employees will either have to hope complaints will be sufficiently pled to make the distinction early, or else be forced to conduct investigation and discovery to fully determine if an individual or official capacity claim was raised.

GOVERNMENT LIABILITY

Attorneys who work with municipalities on a wide range of government liability issues. The Committee typically meets quarterly with a CLE type format. An annual update regarding recent case law decisions, focusing on issues that pertain to cities, counties and other municipalities, is given in the winter at the League of Minnesota Cities in St. Paul. Other meetings rotate among the firms. The December holiday party is always enjoyable.

- Quarterly CLE
- Winter Annual Update of Case Law Decisions
- Representing Cities
- Representing Counties
- Representing other Municipalities
- Annual Holiday Party

For more information, email committee Co-Chairs Jordan H. Soderlind- jhs@ratwiklaw.com or Julia Kelly - julia.c.kelly3@gmail.com

JOIN A COMMITTEE

MDLA committees provide great opportunities for learning and discussion of issues and topics of concern with other members in similar practices. Activity in committees can vary from planning CLE programs, to working on legislation, to informal gatherings that discuss updated practice information or changes in the law. Serving on a committee is one of the best ways to become actively involved in the organization and increase the value of your membership.

WOMEN IN THE LAW

The mission statement of the Women in the Law Committee is to connect the more than 200 women who are MDLA members by:

- Providing opportunities to develop and strengthen relationships, facilitating business growth and professional development;
- Supporting women's career advancement by providing a forum for leadership and professional development; and
- Raising awareness about issues of interest to women lawyers.

For more information, email committee chairs: Ashley Ramstad - ashley@iversonlaw.com, Vicky Hruby - VHruby@jllolaw.com.

EDITORIAL COMMITTEE

MDLA's Editorial Committee is responsible for publication of its quarterly magazine, *Minnesota Defense*. If you would be interested in publishing in the *Minnesota Defense* or serving as an editor, please contact us at director@mdla.org.

For more information, email committee chairs Rachel Beauchamp - rbeauchamp@cousineaulaw.com or Ryan Paukert - rpaukert@larsonking.com

MDLA MEMBERSHIP: A LEGACY OF FRIENDSHIPS

BY STEPHANIE ANGOLKAR

This August, I was tasked with organizing and hosting MDLA's Trial Techniques Seminar ("TTS"). We start the weekend off with the annual Presidents' Dinner at the Kitchi Gammi Club in Duluth, and this year, we gathered at the Glensheen Mansion for tours, dinner, and lawn games on a gorgeous summer evening. MDLA has a large number of Past Presidents that attend TTS and our Mid-Winter Conference ("MWC") and stay engaged in many other ways. Inspired by stories from Past Presidents of long friendships formed through MDLA, I reached out to several recent Past Presidents for feedback about the impact joining and getting involved in MDLA has had on them personally and in their careers. Whether you are considering joining MDLA, are a new member, or have been a member for many years, I hope this article inspires you to make the very most of not only your membership, but your connections with others in MDLA.

1) How has MDLA involvement contributed or led to the development of a friendship?

Mark Solheim: Relationships between defense counsel are important on both a personal and professional level. I vividly recall participating in a difficult deposition and facing an issue I had not previously encountered. Because of a friendship I developed through MDLA with Greg Belinski at Bassford, he came to my rescue. We have all been in depositions with lawyers from out of state or others with whom we have no relationship. I would have never been helped by Greg had it not been for MDLA.

Tammy Reno: I have been involved in MDLA for at least 20 years. One of the things I value the most about my involvement in the organization is the fact I've developed several friendships with other members.

Pat Beety: There are so many close friendships that started with MDLA, but I'll focus on one – and it involves three recent past female presidents of the organization – Dyan Ebert, Jessica Schwie and Lisa Griebel. We all served on the MDLA Board of Directors either together or very close in time. We all share a love of MDLA and passion to continue to encourage camaraderie and information sharing in the competitive world of civil litigation.

Mark Fredrickson: Socializing and working toward a common goal creates relationships. These relationships grow deeper the more time you spend with people, and you find that they share many commonalities and many different life experiences. I found very little judgment and a lot of support throughout 30 plus years of attending MDLA.

Lisa Griebel: You know there is a tight group of us "more seasoned" MDLA attorneys/past leadership that often comment upon the importance of our relationships. I truly have very good friends that I met way back in 2004 when I first went on the board. I really can't overestimate their influence on my life and my work.

I met and became friends with a MDLA Past President whose house I bought (when she married another MDLA member!). My daughter and I moved into her house over ten years ago. After meeting at MDLA, our families went to a lake in northern MN. My daughter and I ended up going to the same lake for nearly 20 years (still do). Don't underestimate getting a good lake recommendation!

I continue to be best mates with a fellow MDLA member who I see often as we are in the same line of work so to speak. All of these people have become very good friends of mine who I rely on in my current job.

2) Were there events or seminars that you attended that helped foster this friendship?

Mark Solheim: Trial Techniques Seminar in Duluth has always been an important seminar for me to attend each year.

Tammy Reno: It has been my continued attendance at TTS and MWC. Being around people for an extended period of time, year after year, has certainly fostered these relationships.

Pat Beety: It started with TTS and MWC, where we first got to see one another in informal and fun settings. The relationship strengthened when we served as leaders on the board, and later encouraging and mentoring one another to take on executive committee roles (President track) and for some of us, leadership roles in DRI.



Stephanie Angolkar is an equity partner at Iverson Reuvers and is the 2025-2026 President of MDLA. Stephanie's practice focuses on the government liability defense and complex litigation. She is a MSBA Certified Civil Trial Law Specialist and has been named a Super Lawyer since 2022. She clerked for the Honorable Harriet Lansing and Kevin G. Ross of the Minnesota Court of Appeals.

Mark Fredrickson: TTS, Midwinter, and committee and association leadership. Participate and engage.

3) Is there a story or experience with a friendship developed through MDLA at an MDLA event or seminar that deepened your affinity for the organization you are willing to share?

Mark Solheim: I joined MDLA because my mentors at Rider Bennett encouraged me to attend and explained that it was an important part of my training. It allowed me to participate in committee work, publish, and speak on an accelerated timeline as compared to other more political organizations.

Tammy Reno: For me, I'd say it was going to events (TTS and MWC in particular) with Rich Scattergood and him introducing me to people and getting me more involved. Both the involvement and the development of relationships hooked me. It was great to have him to show me the ropes so to speak.

Pat Beety: There are so many memories of time spent enjoying one another's company at MDLA events, but one that comes quickly to mind is a recent (last 5 years) TTS where a group of past presidents who had not seen one another much due to COVID, and we gathered at the restaurant in PIER B. Shortly after we got there, we were told it was being shut down to the public to host a wedding event. However, when the wedding party met us, we were soon told to keep our table and join their "reception." We were treated a bit like rock stars when they learned we are lawyers – and litigators -- and that we are also close, close friends.

Mark Fredrickson: Really, there are many. It would be hard to tell where one begins...many of these people I met as a first-year lawyer, many years later as I got more involved in leadership, often through encouragement of others I met at social events.

4) Are there traditions in MDLA events that are meaningful to you? If so, would you share what those traditions are and why they are meaningful?

Mark Solheim: There used to be (special ad hoc gatherings sponsored by various lawyers). We need to bring that back.

Tammy Reno: It's the conferences. I really enjoy MWC. I like that it's smaller and is a bit more relaxed, so I feel like that atmosphere was conducive to me really getting to know people. I really enjoy the first night of the conferences when everyone catches up and spends social time together.

Pat Beety: The most important "tradition" is encouraging families of all ages, sizes and makeup to join MDLA members at TTS and MWC events. And then making sure that they all feel welcome.

Mark Fredrickson: I enjoy the President's dinner. It is a great way not only to see old friends in a great setting, but also to meet new board members, speakers and spouses of people who share my love for this organization.

Lisa Griebel: We do know each other's families- spouses, children. The MDLA family events were central to this. We often comment on, "Remember when our two-year olds walked across that little bridge at the Aquarium for a full two hours?"

5) What would you want newer attorneys to know about the benefit you received from being involved in MDLA?

Mark Solheim: It is an essential part of your training.

Tammy Reno: I think it's a great way to get leadership experience, get to know people who do the same thing, get plugged into the local legal community, learn from some of the best trial lawyers in the state, and make lifelong friends.

Pat Beety: I have one of the largest professional networks of any attorney with whom I regularly work. And it is not just professional "contacts" but a whole host of friends and confidants who I can call on at anytime. Sometimes I may need advice or assistance with a legal issue, other times I am asking for help mentoring or assisting a law student (or new or old lawyer in need career/life advice). Much of this network is directly related to my time and involvement with MDLA.

Mark Fredrickson: MDLA has broadened my relationships with other lawyers in this practice, it opens doors, creates credibility, gives insight into new trends, best practices and provides opportunities for personal and professional growth.

Lisa Griebel: Another MDLA member trusted me with my very first mediation. This person sent me my first mediation and I went on to do many more- built an entire mediation practice because of my relationship and friendship with this person. Crazy but true.

On more than one occasion a MDLA friend has helped me get a handle on opposing counsel that I had not worked with before. Telling me their MO and how to handle. People often forget MDLA really does have the best and brightest litigators in Minnesota. Just saying! This collective knowledge has really benefited me. I have and continue to reach out for referrals from the same group of people.

When I left private practice and went to work for a government agency there was A LOT I had to learn about public entities. Thankfully, several MDLA friends helped me and continue to help me with government law issues- I'm not sure where I would have went with my questions had I not known these folks. And I also knew these were

the people that municipalities hired so they were also the best in the business.

Since I went in-house, I have put MDLA attorneys on my agency's payroll – I can look around a MDLA conference and know of at least three firms that regularly do work for my agency. Not because they are my friends (although that makes for a much better attorney / client relationship I think – they cut me a lot of slack as a client!) but they truly are the best in the business.

6) What do you wish you knew as a newer attorney about MDLA?

Mark Solheim: MDLA is about relationships, but it also provides the foundation to build a resume and business through leadership opportunities.

Tammy Reno: That you get out of it what you put into it.

Pat Beety: Do not be afraid to reach out and ask questions – and then make efforts to meet and get to know Minnesota attorneys. We are truly comprised of some of the smartest, nicest, and most generous people you'll ever meet.

Mark Fredrickson: I wish I had gotten more involved in the new lawyers committee and other committees and volunteered to do more.

Lisa Griebel: MDLA has enriched my life personally and professionally in truly tremendous ways. The friendships and relationships made have truly contributed to my success as an attorney and have enriched my life as a person.

7) What are your hopes for the future of MDLA?

Mark Solheim: Focus on firm finances and succession – stagnant rates will result in more lawyers leaving insurance defense.

Tammy Reno: That it continues to be the great organization that it is. To do that, I think we need to keep recruiting younger attorneys so we can keep passing the torch. We need to get people out of the mindset (maybe I should say firms) that people need to be able to get business out of events for them to be beneficial to a lawyer's development and overall career satisfaction. Yes, it is great to get business and that helps justify missing time from work and not billing time, but developing relationships in the legal community, being an active member of the local bar, and getting CLEs for far cheaper than some of the other options, makes missing the work time worth it. It's not just about the billable hour. That is not the only thing that determines success in this profession. We all have time for what we want to make time for.

Pat Beety: Litigation is a tough business. The demands of clients, and the profession, are not making it easier. My hope

is that MDLA stays relevant to its mission and continues to provide premier education and networking opportunities for today's litigators.

Mark Fredrickson: I hope that young lawyers continue to find value in engagement and training and personal connections that only in person participation in groups like this can provide. I think we lose much when we don't get involved on the theory that it is not "required" or doesn't immediately lead to business. It leads to satisfaction and makes you a better lawyer.

Ways to Get Involved:

1) Sign up for a committee!

2) Attend committee events, even those outside your substantive area! CLEs hosted by committees are FREE!

3) Write an article for MDLA Defense! Writing an article about a new case or development in the law is an easy way to add a published article to your resume and boost your visibility. If you are uncertain of a topic but are interested in writing an article, reach out to the Editors or a Committee Chair for ideas. This is a great development opportunity for newer lawyers or those wishing to boost their profile.

4) Volunteer to present at an MDLA seminar! The Mid-Winter Conference is organized by the incoming MDLA Secretary each year, and the Trial Techniques Seminar is organized by the MDLA President-Elect. Reach out to these officers or MDLA Executive Director Lisa Mortier to share your interest in presenting at a Seminar! Speaking at one of the seminars is also a great development opportunity for lawyers and boosts your profile!

5) Apply to join the Board of Directors. In early summer, the most recent Past President forms a nominating committee to consider and recruit board members and an incoming Secretary. In years' past, this has been competitive, and it may take a few tries to be nominated for official consideration at the annual meeting. If you are not selected your first try or first few tries, do not give up! Stay involved and your contributions to the organization will not go unnoticed!

6) Sign up for DRI and get involved on a national level! This national involvement supplements and benefits MDLA.

Membership Promotions:

New lawyers FREE membership! New lawyers receive complimentary membership. Check out our committees, including the New Lawyers Committee!

Membership continued from Page 15

In-house counsel FREE membership! Last fall, MDLA began offering free membership to in-house counsel, including in-house government attorneys. Contact Executive Director Lisa Mortier for the discount code to sign up or renew your membership for FREE!

Affinity bar members REDUCED membership fee of \$100. Those attorneys who are members of an affinity bar and not presently a MDLA member may take advantage of a reduced membership rate of \$100. This affinity bar fee structure was enacted to promote further diversity of MDLA.

Law students \$20 membership fee. Law students attending our Trial Techniques Seminar or Mid-Winter Conference on scholarships join MDLA, but our events, including committee meetings are open to law student members!

Retired \$30 membership fee. Lawyers retiring from practice but wishing to continue their connections to MDLA pay a reduced membership fee of \$30.

LISA GREIBEL



TAMMY RENO



THANK YOU CONTRIBUTING PAST PRESIDENTS!

PATRICIA BEETY



MARK FREDRICKSON



MARK SOLHEIM



INSPIRING THE NEXT GENERATION: HOW TWO HIGH SCHOOL STUDENTS ARE BUILDING A PIPELINE FOR WOMEN IN LAW

BY SARAH AUSTIN

A female attorney walks into a deposition and is asked, “Are you the court reporter?” This experience, familiar to many female attorneys, sounds like the setup to a bad joke. She enters the courtroom and is directed to the public seating area. She enters mediation and is the only woman in the room. She enters oral arguments before the Eighth Circuit and sees the male faces staring down at her.

Despite decades of advancement, gender disparities remain embedded in the legal profession. A 2023 report revealed that 82% of women attorneys have been mistaken for administrative staff or court reporters—an experience virtually unheard of among their male peers. (Christy Bieber, *Women In Law Statistics 2025*, Forbes, (Mar. 20, 2024), <https://www.forbes.com/advisor/legal/women-in-law-statistics/>). Despite this age-old tale, the story is changing. Nationwide, women make up 39.51% of the more than 1.3 million lawyers, an approximate 5% increase over the last 10 years according to a 2023 report. Over half of law students pursuing a law degree are women, and in 2023, over half of associates in U.S. firms were women. *Id.* While the increase of women in the field is slow, it is nonetheless encouraging. Even more so is the increase in partnership roles for women over the past ten years, with a rise of over 7% from 2013 to 2023. *Id.*

In Minnesota, these gender disparities are breaking down. According to a 2024 report from the National Association of Women Judges, 53% of all Judges in Minnesota are women – up 26% from 2008. At all levels of the State judiciary, apart from the Minnesota Supreme Court, women hold a majority. (2024 *US State Court Women Judges*, Nat’l Ass’n of Women Judges, <https://www.nawj.org/www.nawj.org/statistics/2024-us-state-court-women-judges> (last visited June 3, 2025)).

While more women are entering the field than ever before, the path to parity remains steep. In this evolving landscape, two high school students are stepping up to lead the next generation.

Kena Abdissa and Sela Samson, now seniors at Irondale High School, are co-founders of “Women in the Law”, a student-led organization designed to introduce young women to careers in the legal field. Recognizing a lack of resources and support for students interested in law—especially girls—Abdissa and Samson created a space for peers to explore legal careers through mentorship, networking, and real-world exposure.

Since its inception, the club has grown to include 10–15 active members and has hosted events featuring practicing attorneys who speak candidly about their professional experiences. The founders intentionally seek out speakers who can address common challenges women face in law, including work-life balance, bias in the courtroom, and the financial and academic hurdles of entering the profession.

Samson emphasizes that stereotypes are part of what inspired their mission. She describes the experience of one of the club’s guest speakers, where a female attorney was patted on the head by her male counterpart after achieving a professional accomplishment. The speaker also discussed her experiences being perceived as overly emotional. These stories stuck with Samson, who noted that even stereotypes about women can be turned into superpowers as attorneys. “Emotion is one of the strongest things that can get you through life and it also helps you connect with other humans on a different level,” she says. “As women, that could definitely help us, specifically when being a lawyer.”

The club also provides students with practical opportunities to explore legal environments, including planned visits to courthouses, law firms, and legal clinics. These field trips offer students a behind-the-scenes look at legal practice while highlighting the variety of roles that exist within the profession—from litigation and public defense to compliance and corporate law. Samson stated:

The Club focuses on educating, empowering and uplifting young women who are interested in the legal field. The club explores different careers in



Sarah N. Austin, Jardine Logan & O’Brien, P.L.L.P. Sarah grew up in southern Minnesota and moved to St. Paul to pursue her bachelor’s degree and law degree. Throughout her time studying, Sarah also worked as a legal assistant, paralegal, and law clerk in a variety of practice areas, including personal injury, creditors rights, and humanitarian and employment-based immigration. She practices in the areas of Governmental Liability, Employment Law, and Civil Litigation.

the legal field, including being a lawyer, a judge, or just a legal advocate. We have game time and bonding time as well, not just sitting down and learning all the time. We try to expose members of wide range of areas in the legal field.

Beyond exposure, Women in the Law fosters a sense of community. Abdissa and Samson note that students from a range of backgrounds have joined the club, many of whom would not have otherwise crossed paths. Abdissa noted that:

The catalyst for starting this club was the women in healthcare club. Some of my friends who were interested in this field could turn to this club and potentially get their CNA licenses early on, so I thought this would be a great thing to have for women interested in the field of law. I just wanted to make sure that people with that same interest had that same outlet.

Both founders note the barriers that often deter young people from pursuing law. From the rising costs of education to the emotional toll of the profession, their club seeks to build community to take on these challenges. Nearly one-fourth of women (24.2%) have considered leaving their field, compared to 17.4% of their male counterparts. (Christy Bieber, *Women In Law Statistics 2025*, Forbes, (Mar. 20, 2024), <https://www.forbes.com/advisor/legal/women-in-law-statistics/>). By opening doors early, they hope to demystify the field and make it feel more accessible to students who may not have lawyers in their families or communities.

Their work reflects a growing recognition across the legal field: early engagement and mentorship are essential to building a diverse and representative profession. As more firms and bar associations emphasize recruitment and retention of women attorneys, initiatives like Women in the Law play a critical role in shaping the next generation of leaders.

The Irondale club builds a space where young women see themselves as future lawyers. “Our world in general is what pushed me to the idea, the state of the world, what I think is fair and what I think needs to be changed, all plays a part in my interest in becoming a lawyer,” Samson reflects. Samson stated further “we thought this would be the best opportunity to give other girls resources, mentorship, and confidence in the interest of law.”

Abdissa and Samson will graduate in 2026, but they plan to ensure the club’s continuity by mentoring younger students to take the lead. They agreed this has been the most challenging year yet noting, “if I can get through junior year, there’s nothing I can’t get through.” Their vision is simple yet profound: to inspire, empower, and prepare, young women to step confidently into a profession that needs their voices.



MOTOR VEHICLE ACCIDENT

MDLA’s Motor Vehicle Accident Committee consists of attorneys who primarily represent insurance carriers and their insureds in the defense of motor vehicle accident related claims. The attorneys associated with this committee typically defend claims involving no-fault, property damage, bodily injury and wrongful death issues. We focus on providing members with relevant speakers and regular updates on developments in this practice area. We also provide the members with a committee-specific listserv for communicating about relevant and emerging topics involving this practice area.

For more information, email committee chair Angela Miles ANGELA_L_MILES@progressive.com or Vice Chair Jeff Grace jagrace@arthurchapman.com

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Antone Melton-Meaux
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DRI CORNER

BY TONY NOVAK, LARSON KING

MDLA DRI State Representative



Greetings from DRI! As I write this, I am gearing up for hockey season and mourning the end of Minnesota summer. Before looking ahead, I have to take a moment to recognize a truly fantastic Trial Techniques Seminar this past August in Duluth. My family and I had an incredible time, and the program was great. If you haven't attended a TTS or have missed a year or two, please be sure to make it on your calendar for next August.

On the DRI front, the DRI Annual Meeting was held in October in Chicago. The keynote speaker was Bob Woodward, which was quite the event. DRI also unveiled its new brand and tagline, as the "Association of Lawyers Defending Business."

As we move towards the end of the year, I would encourage all of you to take a moment and plan to attend a DRI seminar in 2026. DRI's website contains a list of all upcoming events, and there is a substantive group for just about any practice.

On final note from earlier this year. As I look back at 2025, one of my favorite events was the North Central Regional Meeting that DRI held in May in Nashville. I attended along with MDLA President Liz Brotten and our fearless Executive Director, Lisa Mortier. The programming was very engaging, and it was great to hear what other SLDOs are doing to keep their members engaged and coming back year after year. It was also a good reminder of how well the state organizations and DRI can work together to add value to both our law practices and our personal development.

As always, if you are considering becoming a DRI member (or you've taken a break and want to re-engage with your DRI membership), please reach out with any questions. Both MDLA and DRI provide a diverse range of professional development opportunities, I would love to share how membership with both groups can fit into any professional development plan.

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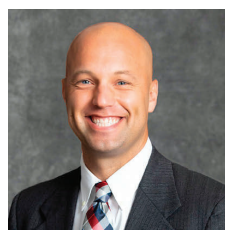
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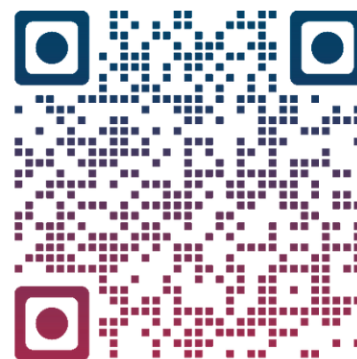
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jwooddy@inquisglobal.com



Minnesota Defense Lawyers Association
9505 Copley Dr.
Indianapolis, IN 46260
(612) 750-8606
www.mdla.org