

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ALEX GOLDMAN,

*Plaintiff/Counterclaim-Defendant,*

v.

CATHERINE REDDINGTON,

*Defendant/Counterclaim-Plaintiff.*

Case No. 1:18-cv-03662-RPK-ARL

**DEFENDANT CATHERINE REDDINGTON'S RULE 56.1 STATEMENT OF  
MATERIAL FACTS**

Pursuant to Local Civil Rule 56.1, Defendant Catherine Reddington submits this statement of material facts as to which there is no genuine issue to be tried.

**I. EVENTS AT THE APRIL 22-23, 2017 DELTA KAPPA EPSILON FRATERNITY PARTY**

1. On April 22, 2017, Catherine Reddington (“Ms. Reddington”) attended a fraternity party at the Syracuse University Delta Kappa Epsilon (“DKE”) fraternity house, where Plaintiff Alex Goldman (“Mr. Goldman”) lived. Exhibit (“Ex.”) 1, ECF No. 1, PageID # 2, ¶5.

2. Ms. Reddington was wearing a white leotard the snapped at the crotch, dark-colored thong-style underwear, blue shorts, white socks, and sneakers. *See* Ex. 2 at REDDINGTON004449; *see also* Ex. 3 at REDDINGTON007221-7238; Ex. 4 at REDDINGTON007601-02.

3. Ms. Reddington’s friend, Gabriella Gazzillo, lent Ms. Reddington the blue shorts. Ms. Gazzillo and Mr. Goldman never had any sexual relations with each other, at any time,

before or after April 23, 2017. *See* Ex. 5 (Declaration of Gabriella Gazzillo), at ¶8; Ex. 6 at 75:24-76:6; 34:24-25; Ex. 7 at 345:10-346:24.

4. At the time of the DKE party, both Ms. Reddington and Mr. Goldman were enrolled as undergraduate students at Syracuse University. Ex. 1, ECF No. 1, PageID # 2, ¶5.

5. While at the DKE party, Ms. Reddington attended a “pregame”<sup>1</sup> in the upstairs bedroom of another fraternity member, Dennis Kadric, along with several other individuals, including Mr. Goldman. Ex. 8 at 164:4-6; 165:7-15; Ex. 7 at 181:15-24.

6. While at the “pregame,” Ms. Reddington and the other attendees consumed alcohol. Ex. 8 at 166:7-10; Ex. 7 at 183:3-6.

7. At approximately 11:00 pm, Ms. Reddington and the other participants in the “pregame” left Dennis Kadric’s room and went downstairs to the main floor of the DKE house, where the DKE party was occurring. Ex. 8 at 171:8-15; Ex. 7 at 200:1-6.

8. During the DKE party, Mr. Goldman and Ms. Reddington began speaking with one another. Ex. 8 at 172:19-25; Ex. 7 at 199:2-13.

9. Prior to the DKE party, Mr. Goldman and Ms. Reddington never had any sexual interactions with one another and, in fact, were only casually acquainted. Ex. 8 at 149:16-150:25; Ex. 9, Def. Obj. and Resp. to Pl. First Interrogatories, No. 7; Ex. 7 at 199:14-19; 313:21-315:2.

10. At approximately 12:30 a.m. on April 23, 2017, Ms. Reddington walked with Mr. Goldman to his room and went inside. Ex. 10 at GOLDMAN001246; Ex. 11 at GOLDMAN001290; Ex. 12 at 111:19-112:8.

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<sup>1</sup> See Merriam-Webster definition of “pregame,” available at <https://www.merriam-webster.com/dictionary/pregame> (last accessed October 19, 2021) (“to begin drinking alcohol before an event or activity (such as a party or a night out)”).

11. Ms. Reddington initially had difficulty recalling what occurred in Mr. Goldman's room on the morning of April 23, 2017, but has articulated certain memories of the events in Mr. Goldman's room since then, including the following: Ms. Reddington remembers Mr. Goldman kissing her, her falling over, Mr. Goldman moving her shorts down, Mr. Goldman dragging her on his floor, Mr. Goldman moving her to his bed, Mr. Goldman penetrating her both vaginally and anally, and "hitting back and forth into the wall." Ex. 8 at 203:6-10; 208:16-18; 209:15-17; 211:24-212:17; 213:3-8; 214:21-22; 308:4-5; 464:5-7.

12. Mr. Goldman believes that Ms. Reddington believes he sexually assaulted her while they were together in his room on April 23, 2017. Ex. 7 at 320:25-321:1 ("I feel that [Ms. Reddington] believes, for whatever reason, that I sexually assaulted her."); 322:4-6 ("She legit thinks she was raped.").

13. Ms. Reddington also remembered the following: while inside Mr. Goldman's room, Ms. Reddington was standing near Mr. Goldman's desk and his chair; Ms. Reddington had a conversation with Mr. Goldman about a hole in his wall, a DKE fraternity photo above his desk, and an old Halloween party invitation and bracelet; Mr. Goldman offered Ms. Reddington a beer, which Ms. Reddington saw was already opened upon Mr. Goldman giving it to her; Ms. Reddington was on Mr. Goldman's floor and her clothes became entangled in Mr. Goldman's desk chair; Ms. Reddington "did not feel clear," in that she did not know what was going on; at some point being dragged by her arms and ending up in Mr. Goldman's bed, but stated that she did not walk there herself. Ex. 8 at 181:21-182:21; 185:25; 187:4-19; 189:21-190:8; 191:13-14; 198:6-15; 203:24-207:14.

14. Ms. Reddington also recalled being blindfolded by what Ms. Reddington believed to be her handkerchief/bandana and being raped multiple times. Ex. 8 at 504:24-505:13; 518:19-23; 520:5-521:15; 523:12-17.

15. In late summer 2020, Ms. Reddington started having recollections of Dennis Kadric also being present in Mr. Goldman's room at some point during the night. Ex. 8 at 504:24-505:7.

16. Mr. Goldman has no memory at all of what occurred in his room between the time he entered with Ms. Reddington until the time he woke up the next morning. Ex. 7 at 48:17-18; 48:23-49:3; 97:8-24; 98:3-4; 110:18-24; 135:15-17; 139:7-11; 152:22-23; 188:17-21; 200:1-14. *See also* Ex. 1, ECF No. 1, PageID #: 2, at ¶5; PageID #: 5, at ¶16.

17. Ms. Reddington awoke the next morning in Mr. Goldman's bed, and Mr. Goldman was lying in bed beside her. Ex. 8 at 271:21-272:20; Ex. 7 at 202:14-22.

18. Mr. Goldman denies that he ever touched Ms. Reddington while they were together in his room on April 23, 2017. Ex. 7 at 202:22-23 ("at no point did I ever touch her."). *See also id.* at 134:25-135:2; 138:20-22; 139:20-23.

19. Upon awaking in Mr. Goldman's bed, Ms. Reddington felt pain to her groin and anus, and soreness on her head. Ex. 8 at 227:5-14.

20. Ms. Reddington got up and left Mr. Goldman's room to return home at approximately 10:30 am on April 23, 2017. Ex. 8 at 271:20-272:4; Ex. 10 at GOLDMAN001246; Ex. 7 at 207:1-3.

21. Ms. Reddington continued to feel pain in her vagina and soreness throughout her body, felt unsteady on her feet, and had difficulty walking and sitting without discomfort. Ex. 8 at 272:4-19; 379:8-9; Ex. 13 at GOLDMAN001541; Ex. 14 at ¶11 and ¶13.

22. When she got home, Ms. Reddington noticed that the leotard she had been wearing was torn at the neckline, and when she took off her clothes, she saw that her underwear and the crotch of her leotard were stained by what appeared to be a large amount of blood, even though she was not menstruating at the time. Ex. 3 at REDDINGTON007233-7238; Ex. 15 at REDDINGTON001932; Ex. 16 at REDDINGTON001628.

23. Ms. Reddington also discovered she had bruises on her body and a splinter in her shoulder. Ex. 17 at REDDINGTON007151, REDDINGTON007155, REDDINGTON007181; REDDINGTON000221, REDDINGTON000222, REDDINGTON000349.

24. On April 23 and 24, 2017, Ms. Reddington expressed confusion and concern to her friends about what had occurred in Mr. Goldman's room and engaged in numerous text communications to try to determine what had happened. *See, e.g.*, Ex. 18 at REDDINGTON4993-5055; Ex. 19 at REDDINGTON005058-79; 5087-93; 5106-07; Ex. 20 at REDDINGTON004788-4990, 5120-37. For example, on April 24, 2017, the day after she left Mr. Goldman's room, Ms. Reddington texted her friend, Akilah Ransom, the following messages: "kiki this is just weird....like my vag last night I was saying to gabby was feeling like it was rammed....like I don't think I want to admit because its weird....but something is weird....its just not adding up." Ex. 20 at REDDINGTON005121-5137.

## II. APRIL 24, 2017 SANE EXAMINATION AT CROUSE HOSPITAL

25. On April 24, 2017, Ms. Reddington went to Crouse Hospital complaining of vaginal pain and bleeding and seeking treatment and testing. She told hospital staff she believed she may have been sexually assaulted at the fraternity house and based on her confusing lack of memory, she suspected that she may have been involuntarily drugged. *See* Ex. 13; Ex. 20 at REDDINGTON004841-4862.

26. During this hospital visit, Tammy Balamut – a trained Sexual Assault Nurse Examiner – observed Ms. Reddington had injuries, including bruises to her body and two lacerations to her labia. *See* Ex. 13 at REDDINGTON007810; Ex. 14 at ¶15.

27. Although Ms. Reddington had already showered, and the visit to the hospital was the day after the alleged sexual assault, Ex. 8 at 431:3-4, Ms. Balamut administered a SANE exam and a toxicology screening to Ms. Reddington. Exs. 13 and 14.

28. During the internal pelvic exam, Ms. Reddington experienced pain and tenderness upon insertion of the speculum which resulted in Ms. Balamut removing the speculum, rendering the exam incomplete. *See* Ex. 14 at ¶13.

29. Ms. Balamut was not able to perform an examination of any potential internal anal injuries because Onondaga County SANEs do not have access to the necessary anal scopes required to conduct such exams. *Id.* at ¶17; Ex. 21 at 298:2-19.

30. Ms. Reddington was prescribed anti-viral, anti-nausea, and a “morning after” oral contraceptive medication upon being discharged from Crouse Hospital. Ex. 22 at REDDINGTON000273.

### III. SYRACUSE POLICE DEPARTMENT AND ONONDAGA DISTRICT ATTORNEY’S OFFICE INVESTIGATION

31. On April 27, 2017, Ms. Reddington went back to Mr. Goldman’s room at the DKE house and briefly spoke to Mr. Goldman, under the pretense that she was looking for an earring she had lost in Mr. Goldman’s room on April 23, 2017. Ex. 23 at GOLDMAN000780.

32. On April 27, 2017, Ms. Reddington reported to the Syracuse Police Department (“SPD”) that she believed she had been sexually assaulted by Mr. Goldman. Ex. 10 at GOLDMAN001232. The case was assigned to SPD Detective Michael Bates. *Id.* at GOLDMAN001242.

33. After Ms. Reddington made her report of sexual assault, SPD took as evidence the thong underwear, leotard, and shorts that Ms. Reddington wore on the morning of April 23, 2017, and which were not washed or used between the time Ms. Reddington left Mr. Goldman's room and the time of collection. *Id.* at GOLDMAN001232; GOLDMAN001242. *See also* Ex. 3 at REDDINGTON007221-7238; Ex. 4 at REDDINGTON007601-02.

34. Detective Bates learned that the DKE house had video cameras that were operating during April 22-23, 2017, and he reviewed certain video surveillance footage from a camera on one end of the hallway where Mr. Goldman's room was located. Ex. 10.

35. Detective Bates did not question any of three potential witnesses seen in surveillance video approaching and attempting to enter Plaintiff's room during the time that Mr. Goldman and Ms. Reddington were inside together, and he did not even attempt to identify two of them. Ex. 12 at 331:8-332:15.

36. Detective Bates did not collect both available surveillance videos that showed the hallway where Mr. Goldman's room was located. *Id.* at 112:19-113:11.

37. Detective Bates lost the surveillance video footage he did collect. *Id.* at 14:14-15:12. *See also* Ex. 21 at 190:22-191:20.

38. Detective Bates did not document his June 27, 2017 interview with Ms. Reddington in which she described injuries to her anus ("that would be my error, plain and simple.") Ex. 12 at 308:2-309:12.

39. Detective Bates did not document that Ms. Reddington told him she recalled being dragged by Mr. Goldman. *Id.* at 334:13-335:18.

40. Detective Bates did not document in his police report that he had met with and interviewed Ms. Reddington on May 8, 2017. *Id.* at 324:18-21; Ex. 11 at GOLDMAN001292.

41. Detective Bates failed to document or otherwise attempt to collect any evidence from Mr. Goldman's room. Ex. 10 at GOLDMAN001246. *See also* Ex. 7 at 49:7-50:5.

42. Detective Bates did not follow up on with the Center for Forensic Sciences ("CFS") about DNA testing for any of the clothing that Ms. Reddington submitted as evidence, even after an initial report identified male DNA in the underwear and suggested that further testing could be performed. Ex. 12 at 225:9-21; 226:15-17; 353:23-354:24.

43. On May 17, 2017, after he had already interviewed Mr. Goldman and alerted him that SPD was conducting an investigation into his interactions with Ms. Reddington at the DKE party on April 22-23, 2017, Detective Bates coordinated a "controlled" call from Ms. Reddington to Mr. Goldman. Ex. 24 at REDDINGTON007204. *See also* Ex. 12 at 137:11-138:10; 138:17-25; 330:7-331:2.

44. During the controlled call, after Ms. Reddington told Mr. Goldman, "I have ripped clothes and my clothes have blood on them and it's just like I mean you're saying no one else was in the room, so...", Mr. Goldman replied, "So, I mean so if no one else was in the room then I guess it was me but I don't remember doing that and I'm incredibly sorry that happened." Ex. 24 at REDDINGTON007204.

45. Mr. Goldman only spoke with Detective Bates once, on May 10, 2017, and after the controlled call, was never re-interviewed by Detective Bates or anyone else at SPD. *See* Ex. 25 ("Plaintiff responds that he met with Detective Michael Bates in-person on May 10, 2017. Plaintiff is also informed that Detective Bates listened to a call between Plaintiff and Defendant on May 17, 2017, although he was not aware at the time.").



46. Assistant OCDA Maureen Barry – who at the time had been an Assistant OCDA for approximately 3 years – was assigned to SPD’s criminal investigation of Ms. Reddington’s complaint. Ex. 21 at 199:14-18; 13:23-14:6.

47. Ms. Barry never attempted to interview Mr. Goldman or any witnesses other than Ms. Reddington. *Id.* at 209:3-10; 260:16-25; 276:10-20; 280:22-281:6. *See also* Ex. 25 (“Plaintiff responds he has never communicated with anyone at the Onondaga District Attorney’s Office.”)

48. Ms. Barry never spoke with Tammy Balamut, the SANE nurse, regarding her examination of Ms. Reddington. Ex. 21 at 281:19-21.

49. Ms. Barry never examined the clothing Ms. Reddington was wearing and had submitted as evidence. *Id.* at 294:16-296:5.

50. Ms. Barry never spoke to the Bernerd Jacobsen, the investigator who handled Ms. Reddington’s sexual assault complaint on behalf of Syracuse University, about his reports or witness interviews. *Id.* at 309:23-14.

51. Ms. Barry never attempted to locate or speak with outcry witnesses. *Id.* at 311:18-312:3.

52. On the afternoon of November 7, 2017 – the afternoon before Mr. Goldman was to go before the Syracuse University Conduct Board hearing – Ms. Barry sent a letter to Plaintiff’s former counsel (and former Assistant OCDA), Scott Brenneck, in which she provided answers to several questions that Mr. Brenneck posed. *Id.* at 107:9-16; Ex. 26 at GOLDMAN000150.

53. Ms. Barry had never sent such a letter to another defense attorney representing a student in a Title IX proceeding before, and she agreed that it was a fairly unusual letter to write. Ex. 21 at 317:6-21.

54. Ms. Barry was instructed by her supervisors, Rick Trunfio and Jeremy Cali, to answer Mr. Brenneck's questions, and Mr. Trunfio and Mr. Cali both made edits to the letter before she sent it to Mr. Brenneck. *Id.* at 264:25-265-6; 267:10-12.

55. Ms. Barry concluded the letter by stating she had "personally reviewed all of the evidence in this case," Ex. 26 at GOLDMAN000154, and that "[a]fter a full and thorough investigation," she concluded "[t]here is no credible proof of any sexual conduct in this case, consensual or nonconsensual." *Id.*

56. Ms. Barry's statement in the letter that she reviewed "all of the evidence" was, in fact, false. Ex. 21 at 309:9-18.

57. The November 7, 2017 letter did not mention that OCDA was still awaiting results from pending DNA analysis being conducted by the CFS. Ex. 21 at 289:2-6.

58. The November 7, 2017 letter acknowledged the two vaginal lacerations sustained by Ms. Reddington, but nonetheless concluded "such injury is not sufficient evidence, standing alone, of a sexual assault." Ex. 26 at GOLDMAN000151.

59. In response to Mr. Brenneck's question, "[d]o you know the results of the DNA analysis," the November 7, 2017 letter addressed the apparent absence of male DNA from the SANE body swab results only, and did not mention any pending or potential DNA testing of Ms. Reddington's clothing. *Id.*

60. The November 7, 2017 letter stated that there was no male DNA identified from the SANE cervical swab, but Ms. Barry acknowledged later that the SANE report indicated that

the cervical exam was discontinued due to discomfort experienced by Ms. Reddington during the test, and further testified that as a sex crimes prosecutor, she knew that cervical swabs often detect semen or are more capable of detecting semen deep inside the body that might not be removed by showering. Ex. 21 at 286:21-287:17.

61. Ms. Barry acknowledged it was unlikely that Xanax from the early morning of April 23, 2017 would have appeared in Ms. Reddington's system at the time toxicology testing was done on April 24, 2017, and so the toxicology report, Ex. 27, was inconclusive on whether Ms. Reddington had, in fact, involuntarily ingested Xanax. Ex. 21 at 291:8-18; 293:11-16.

62. On January 9, 2018, two months after Ms. Barry told attorney Brenneck that she was closing the sexual assault investigation without arrest, and that she had personally reviewed "all" the evidence in the case, CFS issued a report (the "CFS Report,") which indicated a presumptive acid phosphatase spot test for the presence of semen was positive on the underwear that Ms. Reddington wore when she was in Mr. Goldman's room on April 23, 2017. Ex. 21 at 323:20-324:4; Ex. 27 at GOLDMAN001460.

63. The CFS Report also indicated there was a quantity of male DNA identified in the non-sperm fraction of a stain in the underwear. *Id.* at GOLDMAN001460.

64. Although the CFS Report indicated that the male DNA in the non-sperm fraction of the stain "may be suitable for further analysis," neither SPD nor OCDA ever requested that any further testing be conducted. Ex. 21 at 324:17-23.

65. Neither SPD nor OCDA ordered any further testing of the underwear or any testing at all of Ms. Reddington's other submitted clothing items (*i.e.*, the shorts and leotard), even though such testing could provide evidence of sexual assault. *Id.* at 325:21-326:12; 385:20-386:4; 324:17-23; 325:21-326-3.

66. Ms. Barry never notified Ms. Reddington about the CFS Report that identified male DNA on her underwear. *Id.* at 321:23-322:2.

IV. SYRACUSE UNIVERSITY'S CONCURRENT INVESTIGATION AND UNIVERSITY CONDUCT BOARD DECISION TO EXPEL MR. GOLDMAN

67. Concurrently with her reporting of the sexual assault to SPD, Ms. Reddington also reported the sexual assault to Syracuse University. Ex. 23 at GOLDMAN000771.

68. Syracuse University assigned Title IX Investigator Bernerd Jacobson to conduct an investigation into Ms. Reddington's allegations. *Id.*

69. Mr. Jacobson interviewed 15 student witnesses, Ms. Reddington, and Plaintiff (twice). *Id.* at GOLDMAN000773-74.

70. Ms. Reddington submitted an impact statement as part of the Syracuse University Investigation. Ex. 47 at GOLDMAN000949.

71. Mr. Jacobson composed a 100-page report detailing his findings and evidence considered. *See generally* GOLDMAN000771.

72. At a University Conduct Board hearing conducted on November 8, 2017, after assessing the evidence gathered as part of Mr. Jacobson's investigation, the presiding board members found that "[i]njuries to the Complainant [Ms. Reddington] occurred as a result of unwanted sexual contact," and that "[t]he Board finds it more likely than not that the injuries were caused by the Respondent [Mr. Goldman] inserting an unknown object (finger, penis, or other unknown item) into the Complainant's vagina." Ex. 29 at GOLDMAN000643-644.

73. As a result of these findings, Syracuse permanently expelled Plaintiff Goldman from Syracuse University. Ex. 30 at GOLDMAN000945.

74. Following his expulsion from Syracuse University, Mr. Goldman re-enrolled in another college, the New Jersey Institute of Technology (NJIT), where he completed his degree

and graduated in August 2019 with a B.S. in civil engineering. He got an engineering internship, and then an engineering job that he has held from February 2019 through the present. *See* Ex. 25 at 15 and 16.

V. MS. REDDINGTON'S SOCIAL MEDIA POSTS

75. On June 4, 2018, Ms. Reddington posted the following messages on Facebook and LinkedIn:



Catherine Marie is at NJIT.

June 4 at 7:44pm · Newark, NJ ·

\*\*This can be triggering to read so keep that in mind as you read on.

I want to open this post with a recognition. A recognition of all survivors of assault and rape who have felt the need to stay quiet. To stay quiet for the feeling that no one would believe them, to stay quiet for the feeling that for your loved ones it would be too much, to stay quiet for the feeling that once it is out you will not be looked at the same, to stay quiet for the feeling that you might have given the impression that you wanted it, and to stay quiet for the feeling that you could have done something differently to stop it. This is for me, and this is for you.

During the early hours of April 23, 2017 I was raped and sodomized. I woke up in [Delta Kappa Epsilon Fraternity](#) in Alex Goldman's bed confused, bloody, bruised, with ripped clothing and splinter. I went to the police only to be asked if I had ever engaged in rough sex prior to my rape, and my friend to be asked if I slept around. I never slept around, in fact, I have never had a one night stand in my life. Not that that should matter as rape is an act of violence, not sex.

This process of reporting this has been horrible, not only did Alex Goldman expose me to his own evils but also to the injustices in this world. I spent 6 months being deceived and ignored by law enforcement. I spent 6 months trying to work a system that is supposed to work for me. I spent 6 months trying to fix a "flawed" system only to realize it is broken entirely. I have spent my life feeling "protected", feeling safe and feeling confident in my country's justice system only to find out it was all a lie.

ADA Maureen Barry ( <https://www.linkedin.com/in/maureen-barry-3b727322/> ), an SU alum who was at one point apparently on my case, took her time to write a SIX page response to Alex Goldman's lawyer stating that I was not raped by criminal standards and that she was not positive that my clothing was bloody, when it in fact was. She wrote this for Alex's lawyer to use against me in my University case against him. Despite her disgusting and inconceivable efforts to help Alex Goldman get away with my rape he was still expelled, as criminal burden of proof is much higher than that of a university.

Besides taking my own sense of security that night, Alex Goldman's actions have exposed me to the true injustices in our "justice" system. I feel scared knowing that it is 2018 and women are in no means protected by our government. Knowing that women are still viewed more for the purpose of their body parts than the words of their hearts, of their souls.

Once I informed Detective Michael Bates from the "Abused Persons Unit" of Syracuse Police Department, for a third time, that I had been sodomized, the attitude with which he regarded my case changed. He even tried to tell me I never made him aware of the sodomy- only I had, he just clearly wasn't listening. While I was happy with his change of attitude towards the seriousness of my case, I couldn't help but be enraged by what his change of attitude had meant for me as well as for the women of America. That a rape allegation was only being taken more seriously because it was



accompanied by sodomy? Penetration without consent should be wrong whether it was done to my vagina or anus, or both. Rape should not be dismissed because it was done to a sex organ, rather than a place of waste.

We say it's our society's attitude that feeds the rape culture in America. But our own legal system encourages it by making such biased assumptions and preconceived notions. By believing that the function of woman's vagina speaks louder than her voice.

By assuming that my injuries were a product of having a vagina and not a product of rape.

But injuries to my anus, and it not being a sex organ, must mean that I did not want what was done to me. Why do the biological functions of my body speak more than my own voice does? However, once a body part not made for sex is involved, automatically it must have been nonconsensual? As if my body's role in sex makes me incapable of not wanting it to be penetrated. I

ee.585/posts/10215868923373744

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Catherine Marie - \*\*This can be triggering to read so keep... |

thought women and men were equal and now I see we clearly aren't. I thought in 2017/2018 people were given rights based off being human, not based off their gender. I no longer feel the same sense of security and comfort that I once felt in this world.

And as impossible as it is to try to see any positive in this assault, I try to remind myself that in this very dark and ugly event there is light and hope, for me and for others. Since the days after the assault I have been faced with choices. The choice to resist accepting this as my new reality. Or the choice to fight like hell.

To fight him, to fight my own internal denial, and to fight a system that was so clearly broken. To take back the power he so viciously took from me. To take action out of respect for myself and out of responsibility for all those who he will attack after me. I knew if I wasn't able to fight for myself that I would then have to at least fight for the others that would come after me.

People don't wake up one day and randomly decide they are going to violently rape and sodomize someone.

I won't allow him to damage someone else just as he did to me. Even though I will never get back what I lost that night, at least I can prevent others from having to endure his cruel and demeaning violence. Because being able to do that makes the fight that I have been fighting for these past 13 months worth it.

My motive is to try to stop him from ruining another person's life, as this will not be the last time.

He is a predator.

He didn't have to rape and sodomize me. He didn't have to do any of this. This is more than just seeking justice; this is seeking prevention.

I completed an entire two semesters at the school where my rapist was expelled from, one of which he was there for, but to this day he continues to walk free. My rapist has an internship with [Bohler Engineering](#) and will be graduating from a different college, New Jersey Institute of Technology. I have had multiple individuals that have approached me, expressed their knowledge of Alex Goldman's track record.

Alex Goldman is a rapist. I write this post because this is not the first time

Alex Goldman has raped someone and I want to make sure that it is the last. With the condition that he left me in, I am afraid for his potential victims. While I am proud to say I got my rapist expelled from Syracuse University, on November 15, 2017, he now attends New Jersey Institute of Technology where he is on track for graduation. Clearly my school officials saw something wrong enough with him to remove him permanently from my university, however, our law enforcement continues to allow him to walk the streets. While I tried doing this "the systematic way", this monster is free and should be behind bars.

To his fraternity brothers who lied during my process and turned a blind eye over the past years you should be ashamed and disgusted with yourselves.

NJIT

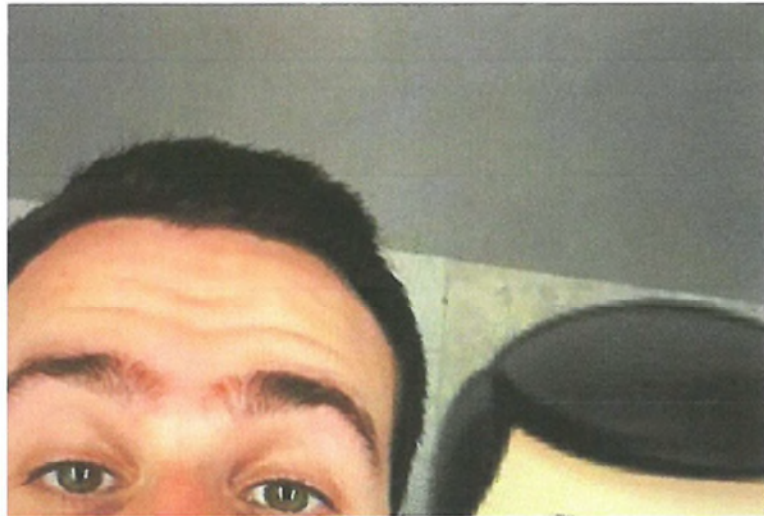
NJIT - Newark College of Engineering

Syracuse Police Department

#MeToo #NewJerseyInstituteofTechnology #NJIT #BohlerEnginerring

<https://www.linkedin.com/in/alex-goldman-b99502b1>

<https://www.facebook.com/alex.goldman.98/photos...>



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Catherine Marie - \*\*This can be triggering to read so keep.





Ex. 31 at GOLDMAN000024. The LinkedIn post was as follows:



**Catherine Reddington**  
Student at Syracuse University  
1w · Edited

...

(1)

I want to open this post with a recognition. A recognition of all survivors of assault and rape who have felt the need to stay quiet. To stay quiet for the feeling that no one would believe them, to stay quiet for the feeling that for your loved ones it would be too much, to stay quiet for the feeling that once it is out you will not be looked at the same, to stay quiet for the feeling that you might have given the impression that you wanted it, and to stay quiet for the feeling that you could have done something differently to stop it. This is for me, and this is for you.

During the early hours of April 23, 2017 I was raped and sodomized. I woke up in DKE in Alex Goldman's bed confused, bloody, bruised, with ripped clothing and splinters. I went to the police only to be asked if I had ever engaged in rough sex prior to my rape, and my friend to be asked if I slept around. I never slept around, in fact, I have never had a one night stand in my life. Not that that should matter as rape is an act of violence, not sex.

**New Jersey Institute of Technology**

**Bohler Engineering**

**#MeToo**



**Catherine Reddington**

Student at Syracuse University

1w · Edited

(2)

This process of reporting this has been horrible, not only did Alex Goldman expose me to his own evils but also to the injustices in this world. I spent 6 months being deceived and ignored by law enforcement. I spent 6 months trying to a work a system that is supposed to work for me. I spent 6 months trying to fix a "flawed" system only to realize it is broken entirely. I have spent my life feeling "protected", feeling safe and feeling confident in my country's justice system only to find out it was all a lie.

Besides taking my own sense of security that night, Alex Goldman's actions have exposed me to the true injustices in our "justice" system. I feel scared knowing that it is 2018 and women are in no means protected by our government. Knowing that women are still viewed more for the purpose of their body parts than the words of their hearts, of their souls.

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7 Likes



**Catherine Reddington**

Student at Syracuse University

1w · Edited

...

(3)

Besides taking my own sense of security that night, Alex Goldman's actions have exposed me to the true injustices in our "justice" system. I feel scared knowing that it is 2018 and women are in no means protected by our government. Knowing that women are still viewed more for the purpose of their body parts than the words of their hearts, of their souls.

Once I informed Detective Michael Bates, for a third time, that I had been sodomized, the attitude with which he regarded my case changed. He even tried to tell me I never made him aware of the sodomy- only I had, he just clearly wasn't listening. While I was happy with his change of attitude towards the seriousness of my case, I couldn't help but be enraged by what his change of attitude had meant for me as well as for the women of America. That a rape allegation was only being taken more seriously because it was accompanied by sodomy? Penetration without consent should be wrong whether it was done to my vagina or anus, or both. Rape should not be dismissed because it was done to a sex organ, rather than a place of waste.

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**Catherine Reddington**  
Student at Syracuse University  
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(4)

We say it's our society's attitude that feeds the rape culture in America. But our own legal system encourages it by making such biased assumptions and preconceived notions. By believing that the function of woman's vagina speaks louder than her voice.

By assuming that my injuries were a product of having a vagina and not a product of rape.

But injuries to my anus, and it not being a sex organ, must mean that I did not want what was done to me. Why do the biological functions of my body speak more than my own voice does? However, once a body part not made for sex is involved, automatically it must have been nonconsensual? As if my body's role in sex makes me incapable of not wanting it to be penetrated. I thought women and men were equal and now I see we clearly aren't. I thought in 2017/2018 people were given rights based off being human, not based off their gender. I no longer feel the same sense of security and comfort that I once felt in this world.

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**Catherine Reddington**  
Student at Syracuse University  
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(5)

And as impossible as it is to try to see any positive in this assault, I try to remind myself that in this very dark and ugly event there is light and hope, for me and for others. Since the days after the assault I have been faced with choices. The choice to resist accepting this as my new reality. Or the choice to fight like hell. To fight him, to fight my own internal denial, and to fight a system that was so clearly broken. To take back the power he so viciously took from me. To take action out of respect for myself and out of responsibility for all those who he will attack after me. I knew if I wasn't able to fight for myself that I would then have to at least fight for the others that would come after me.

People don't wake up one day and randomly decide they are going to violently rape and sodomize someone.

I won't allow him to damage someone else just as he did to me. Even though I will never get back what I lost that night, at least I can prevent others from having to endure his cruel and demeaning violence. Because being able to do that makes the fight I fought for these past 13 months worth it.

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**Catherine Reddington**

Student at Syracuse University

3h • Edited

(6)

I completed an entire two semesters at the school where my rapist was expelled from, one of which he was there for, but to this day he continues to walk free. My rapist has an internship with @**Bohler Engineering** and will be graduating from a different college, New Jersey Institute of Technology. I have had multiple individuals that have approached me, expressed their knowledge of Alex Goldman's track record, as they have had similar experiences.

Alex Goldman is a rapist. I have to write this post because this is not the first time that Alex Goldman has done this, and it will not be his last. With the condition that he left me in, I am afraid for his future potential victims. While I am proud to say I got my rapist expelled from Syracuse University, on November 15, 2017, he now attends New Jersey Institute of Technology where he is on track for graduation. Clearly my school officials saw something wrong enough with him to remove him permanently from my university, however, our law enforcement continues to allow him to walk the streets. While I tried doing this "the systematic way", this monster is free and should be behind bars.

New Jersey Institute of Technology

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76. Prior to making the social media postings, Ms. Reddington heard from another woman that she knew that Mr. Goldman had sexually assaulted a Syracuse University classmate named [REDACTED]. Ex. 8 at 50:20-52:22. *See also* Ex. 32 at REDDINGTON7132. Ms. Reddington believed this information to be reliable because the source from whom she learned it was a friend and fellow sorority sister whom she considered to be trustworthy and who was actually a close friend and roommate of Ms. [REDACTED]. Ex. 8 at 37:16-23; 39:12-40:10; 50:20-51:13.]

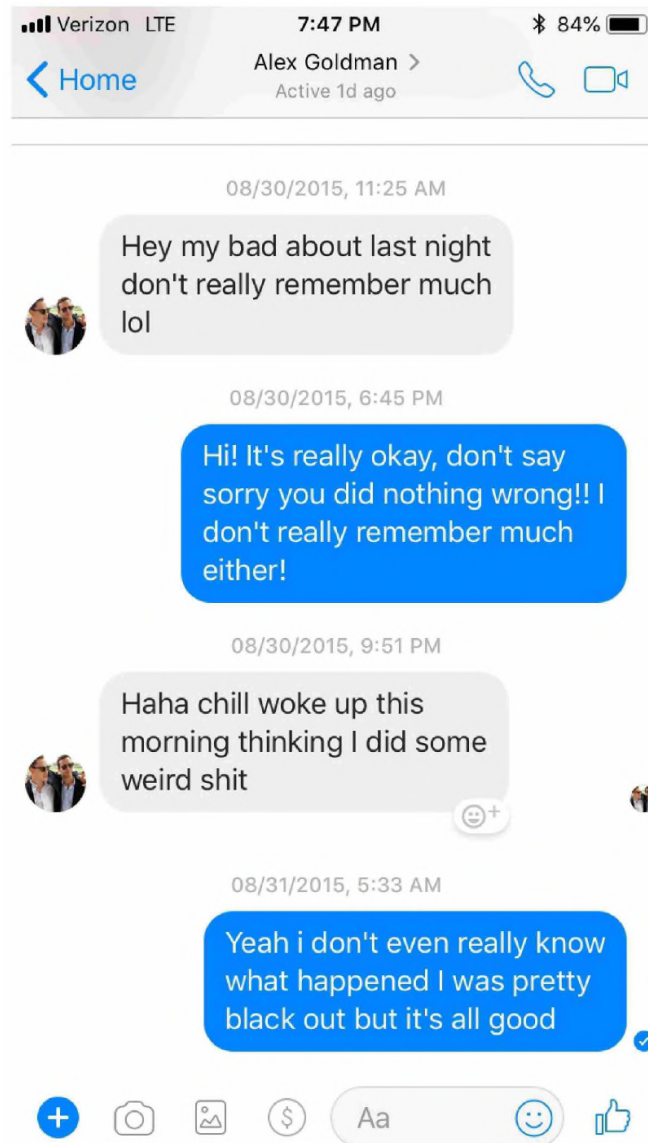
77. [REDACTED] was later deposed by Mr. Goldman in this litigation, and she confirmed – in sworn testimony – that Mr. Goldman had sexually assaulted her on August 29, 2015, less than two years prior to the DKE party on April 22, 2017. Ex. 33 at 57:4-23; 59:3-12; 72:4-7; 76:2-7; 76:17-23. *See also* Ex. 34.

78. Ms. [REDACTED] had previously shared the story of being sexually assaulted by Alex Goldman with her friends and roommates. Ex. 33 at 49:11-15; 49:22-50:14; 82:17-20; 88:24-89:12; 95:20-25.

79. On June 5, 2017, after Ms. Reddington had made her postings on Facebook and LinkedIn, Ms. [REDACTED] contacted Ms. Reddington privately and told her that she “was not alone” and that “a similar situation had happened with the same guy.” Ex. 35 at REDDINGTON004131.

80. On June 30, 2017, Ms. [REDACTED] sent Ms. Reddington the following Facebook message she had received from Mr. Goldman on August 30, 2015, the day after Ms. [REDACTED] testified Mr. Goldman raped her:





Ex. 32 at REDDINGTON004098-99.

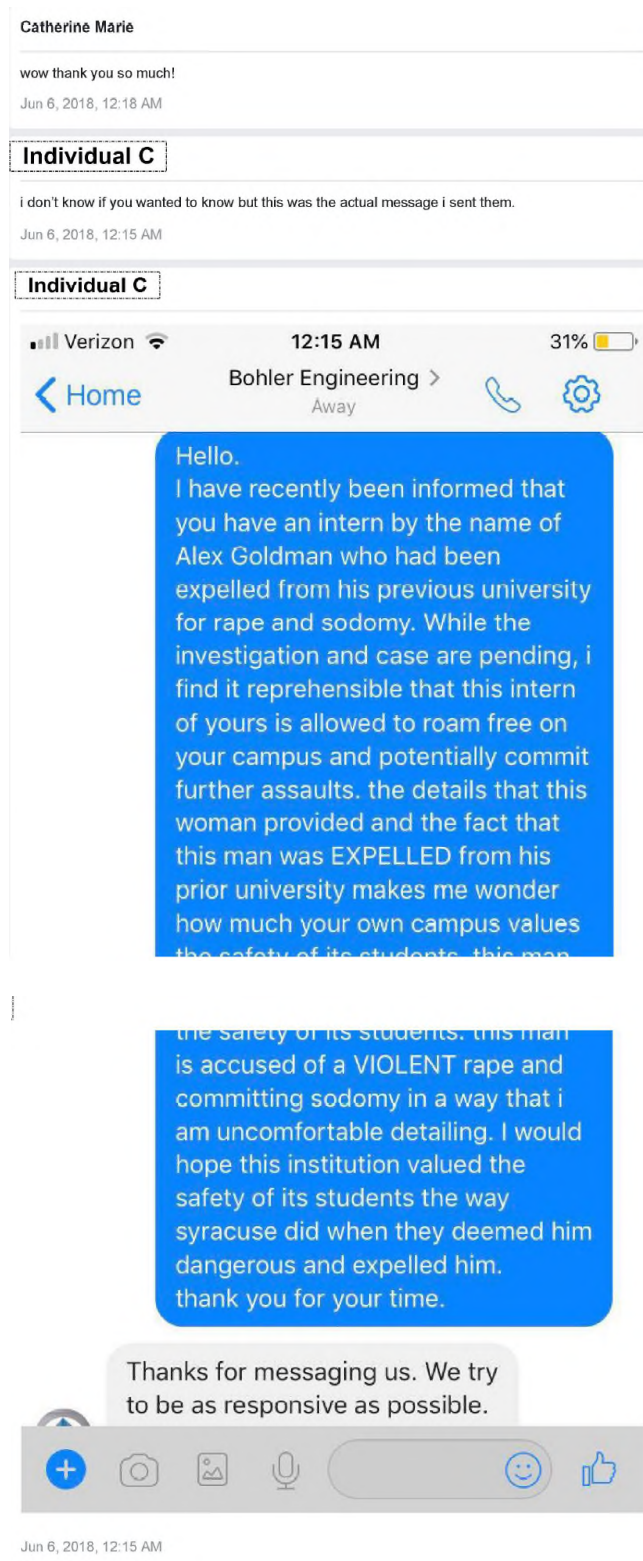
81. In addition to [REDACTED], Ms. Reddington had heard of another woman named [REDACTED] who was sexually assaulted by Mr. Goldman, and additionally, Ms. Reddington knew of two of Mr. Goldman's fraternity brothers who "made commentary about him having prior behavior similar to this." Ex. 8 at 33:8-24; 34:16-23; 36:8-12.

82. Mr. Goldman previously had sex with a woman named [REDACTED] Ex. 7 at 322:7-323:7.

83. On June 5, 2018, the day after she made her social media post, Ms. Reddington stated to her sister Alicia in a text message, “I have talked to my school and nothing I said is false,” and further that “everything I put was on the conditions I woke up in and my experience so that’s all truth.” Ex. 36 at REDDINGTON004167-87.

84. After Ms. Reddington made her social media posts, dozens of individuals reached out to her privately via Facebook to express support and allegiance. Some of these Facebook messages came from sexual assault survivors who wished to thank Ms. Reddington for her bravery in posting about her experiences. *See* Ex. 37 at REDDINGTON007083; REDDINGTON007084; REDDINGTON007085-86; REDDINGTON007087; REDDINGTON007094; REDDINGTON007095; REDDINGTON007096; REDDINGTON007097; REDDINGTON007102-03; REDDINGTON007104-05; REDDINGTON007106; REDDINGTON007107; REDDINGTON007108; REDDINGTON007109-10; REDDINGTON007112; REDDINGTON007113; REDDINGTON007114; REDDINGTON007115; REDDINGTON007116-17; REDDINGTON007118; REDDINGTON007119; REDDINGTON007120; REDDINGTON007121; REDDINGTON007122; REDDINGTON007123; REDDINGTON007128; REDDINGTON007129-30; REDDINGTON007131.

85. After Ms. Reddington made her post, she also received the following message from a woman named Catherine Schay, who had seen her post and directly contacted Bohler Engineering (“Bohler”):



Ex. 48, Declaration of Catherine Schay, and Exhibit A attached thereto, at REDDINGTON006565-

66.

86. On June 5, 2018, after Ms. Schay sent the above message to Bohler, Bohler terminated Mr. Goldman from his internship for failing to disclose that he had been expelled from Syracuse University for sexual assault. Ex. 7 at 35:10-36:16; 27:1-28:2; 30:4-31:11; 33:19-34:1.

87. Ms. Reddington did not directly contact Bohler at any time. *See* Ex. 38 and Exhibit A thereto, at REDDINGTON006565-66; Ex. 8 at 452:4-11.

VI. THE INSTANT LITIGATION AND THE EMERGENCE OF ADDITIONAL FORENSIC EVIDENCE

88. On June 25, 2018, Mr. Goldman commenced the instant litigation against Ms. Reddington, alleging one count of defamation and one count of tortious interference with prospective economic advantage under New York law. *See generally* Ex. 1.

89. In addition to Ms. Reddington's social media posts, referenced above, Mr. Goldman alleged in his complaint that Ms. Reddington made the following additional four defamatory statements:

- a. Defendant's text message to Thomas Aiello on November 17, 2017, in which Defendant wrote: "And now I have girls coming up thanking me be of what he's done to their own friends. Fuck that. All I'm saying is im not standing up for a house that is condoning someone who ruined physically damaged my body and who are literally standing up for a violent rapist." Ex. 1, ECF No. 1, Page ID#: 15, ¶56.a.
- b. Defendant's text message to Dennis Kadric in May 2018, in which Defendant referred to Mr. Goldman as a "monster." Ex. 1, ECF No. 1, Page ID#: 15, ¶56.b.
- c. Defendant's post on the social media platform Facebook on June 5, 2018, in which she directly contacted Bohler Engineering and made false statements and subsequently celebrated its firing of Mr. Goldman. Ex. 1, ECF No. 1, Page ID#: 16, ¶56.e.

- d. Defendant's post on the social media platform Facebook on June 6, 2018, in which she posted on the reviews section for NJIT: "[a] school that accepts recently expelled rapists, despite it being marked on their transcript." Ex. 1, ECF No. 1, Page ID#: 16, ¶56.f.

90. Ms. Reddington did not send Mr. Kadric the text identified at Ex. 1, ECF No. 1, Page ID#: 15, ¶56.b. *See* Ex. 46 at 109:11-110:2.

91. On February 4, 2019, Ms. Reddington, through her attorneys, sent a Freedom of Information Law request to the OCDA seeking documents relevant to its criminal investigation of Mr. Goldman. *See generally* Ex. 38, Declaration of Matthew Kennison ("Kennison Declaration").

92. OCDA finally released the documents, which included the CFS Report, on June 14, 2019. *Id.* at ¶ 3. It was only then – more than two years after the April 2017 sexual assault – that Ms. Reddington learned for the first time that CFS had detected male DNA in the underwear she wore the morning of the sexual assault. *Id.* at ¶ 4.

93. Ms. Reddington, through her attorneys, eventually secured the release from OCDA and SPD of all the clothing items she wore on April 22-23, 2017, including the thong underwear, the leotard, and the blue shorts. The clothing items were sent directly from SPD to Bode Technology ("Bode"), a private laboratory located in Virginia. *See* Ex. 39, Declaration of Danielle Reed and Exhibit A thereto, ECF No. 87, PageID #: 1322-23. *See also id.* at Exhibit C, at PageID #: 1330-1331.

94. The underwear, leotard, and shorts were submitted for further DNA and serological testing by Bode, which OCDA of CFS had never conducted. *Id.*

95. Bode issued two forensic reports – dated October 2, 2020 and May 27, 2021 – detailing the findings of its forensic testing of the underwear, leotard, and shorts. *See* Ex. 40 and

Ex. 41 (the “Forensic Reports”). The Forensic Reports included the following findings from the testing performed:

- a. For the samples taken from the “White Leotard [interior crotch]” and “Shorts [interior crotch],” the presence of “spermatozoa were confirmed”. Ex. 40 at REDDINGTON007205.
- b. Confirmed the presence of male DNA on the underwear, leotard, and shorts. Ex. 41 at pages 1-3; Ex. 40 at REDDINGTON007205-06.
- c. Stating the evidence was processed for DNA typing using the GlobalFiler kit, and concluding the “DNA profile previously obtained from the sperm fraction (SF) of [the sample from the inner crotch of the shorts] is consistent with a mixture of three individuals including at least one male contributor,” and further “[a]ssuming a mixture of three individuals, this mixture DNA profile obtained is at least 7.6 quadrillion times more likely to be observed if it originated from Alex Goldman, Catherine Reddington and one unknown, unrelated individual than if from Catherine Reddington and two, unknown, unrelated individuals,” and that “This statistical result provides very strong support for inclusion.” *See* Ex. 41 at pages 2.
- d. Stating the evidence was processed for DNA typing using the GlobalFiler kit, and concluding the “DNA profile previously obtained from the epithelial fraction (EF) of [the sample from the inner crotch of the shorts] is consistent with a female contributor. This DNA profile matches the DNA profile obtained from Catherine Reddington.” *Id.*
- e. Stating the evidence was also processed for DNA typing by analysis of Short Tandem Repeat (STR) loci specific to the male Y chromosome (also called Y-STRs) using the PowerPlex Y23 kit, and concluding the “Y-STR profile obtained from the sperm fraction (SF) of [the sample from the inner crotch of the shorts] is consistent with a mixture of two individuals including a major contributor (Male 1) and a minor contributor (Male 2). Alex Goldman cannot be excluded as a possible contributor of the minor component Y-STR profile deduced from the sperm fraction (SF) of [the sample from the inner crotch of the shorts],” and further that “Y-STR profile obtained [the sample from the inner crotch of the shorts] is at least 338 times more likely to be observed if it originated from Alex Goldman than if from an unknown, unrelated male individual from the US population.” *See* Ex. 41 at pages 2-3.
- f. Stating the evidence was also processed for DNA typing by analysis of Short Tandem Repeat (STR) loci specific to the male Y chromosome (also called Y-STRs) using the PowerPlex Y23 kit, and concluding “[a] partial Y-STR profile was previously obtained from the sperm fraction (SF) of [the sample taken from Ms. Reddington’s underwear], and that “[d]ue to the limited data obtained, Alex



Goldman cannot be included or excluded as a possible contributor of the partial Y-STR profile obtained from the sample listed above.” *Id.* at page 2.

VII. MS. REDDINGTON’S POST-ASSAULT MEDICAL AND PSYCHOLOGICAL TREATMENT

96. In early June of 2017, Ms. Reddington sought treatment from a psychiatrist, Dr. Diane Klein, in connection with the sexual assault that she believed took place in Mr. Goldman’s room approximately six weeks earlier. Ex. 42 at REDDINGTON006866-68

97. Ms. Reddington reported to Dr. Klein she was experiencing symptoms including anxiety, depressed mood, sleep disturbance, difficulty concentrating, loss of appetite, panic symptoms, nightmares, full-body shaking, emotional numbing, and intrusive thoughts. She also reported experiencing rectal tenderness and scalp tenderness. *Id.*

98. In late June and early July 2017, Dr. Klein diagnosed Ms. Reddington with post-traumatic stress disorder (PTSD) and dissociation. *Id.* at REDDINGTON006869.

99. Also in early June 2017, Ms. Reddington also began seeing a psychotherapist, Dr. Maria Steenkamp, in connection with the symptoms of PTSD that she was experiencing following what she believed was a sexual assault by Mr. Goldman on April 23, 2017. Ex. 43 at REDDINGTON004294-95 and Declaration of Maria M. Steenkamp, Ph.D. (“Steenkamp Dec.”), at ¶8.

100. At the time she began seeing Dr. Steenkamp in early June 2017, Ms. Reddington reported a lack of memory regarding what happened to her in Mr. Goldman’s room and feeling “detached,” though she recalled physical sensations from the night, such as the sensation of her arms being pinned above her. *Id.*

101. In late June 2017, Dr. Steenkamp also began noting that Ms. Reddington might be experiencing dissociation, based on her reported symptoms of feeling “Redacted,” “Redacted,” and forgetful. *Id.* at REDDINGTON004296-97.

102. Dr. Steenkamp employed several different therapies for processing trauma with Ms. Reddington, including cognitive behavior therapy (“CBT”), prolonged exposure (“PE”), and eye movement desensitization and reprocessing (“EMDR”). Dr. Steenkamp first used EMDR with Ms. Reddington on or about July 12, 2017. *Id.* at REDDINGTON004298 and Steenkamp Dec. at ¶11.

103. Dr. Klein, the psychiatrist, was kept apprised of Ms. Reddington’s psychotherapy with Dr. Steenkamp, including EMDR. Ex. 42 at REDDINGTON006869-71 and Steenkamp Dec. at ¶7.

104. Ms. Reddington used EMDR with Dr. Steenkamp during the summer of 2017 but also used other forms of therapy at times because she was “Redacted Redacted.” Ex. 43 at REDDINGTON004301.

105. Ms. Reddington stopped EMDR treatment when she returned to school in autumn 2017. Ex. 43 at REDDINGTON004303; Ex. 42 at REDDINGTON006874.

106. In December 2017, Dr. Klein noted that Ms. Reddington “Redacted” in her management of PTSD “Redacted.” REDDINGTON006873.

107. Throughout 2017 and 2018, Ms. Reddington continued her treatment with Dr. Klein and Dr. Steenkamp (taking breaks while she was away at school) because of continued PTSD and related symptoms, including nightmares, flashbacks, emotional numbness, and somatic symptoms. *See generally* Exs. 42 and 43.

108. In July 2017, Ms. Reddington sought an evaluation from neurologist Dr. Janet Elgallab in connection with forgetfulness that she was experiencing following the events of April 23, 2017. Ex. 44 at REDDINGTON0007013.

109. Ms. Reddington reported to Dr. Elgallab that she believed that she had been sexually assaulted on April 23, 2017 and may have been drugged. Ms. Reddington also reported to Dr. Elgallab that when she awoke on April 23, 2017, she had “lots of head pain, bumps on her head, unsteady gait, foggiess and forgetful.” *Id.*

110. Redacted

*Id.* at REDDINGTON0007016;

REDDINGTON0007007-8, REDDINGTON0007012-7017, REDDINGTON0007032-7035.

111. Redacted

Ex. 45 at REDDINGTON0006999-7000.

112. Redacted

*Id.*

113. Redacted

*Id.*

114. Redacted

*Id.* at REDDINGTON 0007001-06.

115. Ms. Reddington has continued to experience dissociation and symptoms of PTSD in connection with the events of April 23, 2017, and she continues to receive regular treatment from Dr. Steenkamp and Dr. Klein through 2021. *Id.* and Steenkamp Dec. at ¶15.

116. Ms. Reddington continues to take medication prescribed by Dr. Klein for anxiety and PTSD, including Propranolol and Lexapro. Ex. 8 at 488:14-490:17.

Date: March 12, 2026

Respectfully Submitted,

/s/ Sandra L. Musumeci

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on March 12, 2026, she caused a true and correct copy of the foregoing document to be served via email to Plaintiff/Counterclaim Defendant's counsel of record.

/s/ Sandra L. Musumeci  
Sandra L. Musumeci