

FILED DATE: 6/23/2025 1:25 PM 2025L007963

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

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Estate of Dr. Jane Wu  
  
  
  
  
  
  
  
  
  
v.  
  
  
  
  
  
  
  
  
  
Northwestern University

No. 2025L007963

CIVIL ACTION COVER SHEET - CASE INITIATION

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. Only one (1) case type may be checked with this cover sheet.

Jury Demand ☒ Yes ☐ No

PERSONAL INJURY/WRONGFUL DEATH

CASE TYPES:

- ☐ 027 Motor Vehicle
- ☐ 040 Medical Malpractice
- ☐ 047 Asbestos
- ☐ 048 Dram Shop
- ☐ 049 Product Liability
- ☐ 051 Construction Injuries  
(including Structural Work Act, Road Construction Injuries Act and negligence)
- ☐ 052 Railroad/FELA
- ☐ 053 Pediatric Lead Exposure
- ☐ 061 Other Personal Injury/Wrongful Death
- ☒ 063 Intentional Tort
- ☐ 064 Miscellaneous Statutory Action  
(Please Specify Below\*\*)
- ☐ 065 Premises Liability
- ☐ 078 Fen-phen/Redux Litigation
- ☐ 199 Silicone Implant

TAX & MISCELLANEOUS REMEDIES

CASE TYPES:

- ☐ 007 Confessions of Judgment
- ☐ 008 Replevin
- ☐ 009 Tax
- ☐ 015 Condemnation
- ☐ 017 Detinue
- ☐ 029 Unemployment Compensation
- ☐ 031 Foreign Transcript
- ☐ 036 Administrative Review Action
- ☐ 085 Petition to Register Foreign Judgment
- ☐ 099 All Other Extraordinary Remedies

By: /s/ Thomas Geoghegan  
(Attorney) (Pro Se)

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COMMERCIAL LITIGATION

CASE TYPES:

- ☒ 002 Breach of Contract
- ☐ 070 Professional Malpractice  
(other than legal or medical)
- ☐ 071 Fraud (other than legal or medical)
- ☐ 072 Consumer Fraud
- ☐ 073 Breach of Warranty
- ☒ 074 Statutory Action  
(Please specify below.\*\*)
- ☐ 075 Other Commercial Litigation  
(Please specify below.\*\*)
- ☐ 076 Retaliatory Discharge

OTHER ACTIONS

CASE TYPES:

- ☐ 062 Property Damage
- ☐ 066 Legal Malpractice
- ☐ 077 Libel/Slander
- ☐ 079 Petition for Qualified Orders
- ☐ 084 Petition to Issue Subpoena
- ☐ 100 Petition for Discovery

\*\* 775 ILCS 5/1-101, et seq.

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**Pro Se Only:** ☐ I have read and agree to the terms of the *Clerk's Office Electronic Notice Policy* and choose to opt in to electronic notice from the **Clerk's Office** for this case at this email address: \_\_\_\_\_

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

Estate of Dr. Jane Wu,	)	
	)	
Plaintiff,	)	2025L007963
	)	
v.	)	
	)	Jury Trial Demanded
Northwestern University,	)	
	)	
Defendant.	)	

**COMPLAINT**

**Introduction**

1. The Plaintiff Estate of Dr. Jane Wu sues the Defendant Northwestern University (“NU”) for violations of the late Dr. Wu’s rights under the Illinois Human Rights Act, 775 ILCS 5/1-101, *et seq.* These include NU’s violations of her statutory rights to be free of discrimination in employment because of (1) her race or national origin as a Chinese American U.S. citizen, (2) her gender, as a woman, and (3) a disability that NU’s own unlawful acts to oust her had caused or made worse. Under the Illinois Survival Act, 755 ILCS 5/27-6, the Plaintiff Estate of Dr. Wu brings not only these statutory claims but other common law claims for NU’s tortious conduct—including assault and battery, false imprisonment, and willful and wanton conduct by the outrageous manner in which NU evicted her from her office on May 23, 2024, and forced her into the Northwestern Memorial psychiatric hospital, as a means to end her active research and employment.

2. As set forth below, following these discriminatory and tortious acts by Defendant NU and after her release from the Northwestern Memorial hospital, Dr. Wu took her own life on July 10, 2024. The unlawful discriminatory and tortious actions by NU as set forth here were a substantial and decisive factor in her decision to end her life.

3. Dr. Wu was a leading scientist, a distinguished academic, and a long-time tenured faculty member at NU's Feinberg School of Medicine in the fields of neurology, molecular biology, and genetics.

4. In 2019, she, along with other innocent Chinese American scientists, became the target of the so-called China Initiative begun by the U.S. Department of Justice during the first Trump Administration. Without any charge then or later of any misconduct by her, Dr. Wu was one of those targeted and was placed under an administrative investigation by the National Institutes of Health ("NIH") and limited from furthering her active research by NU. No charge of any kind was in fact ever made against Dr. Wu, and there was no question of any private misuse of her research as all of her research was in the public domain. Nonetheless, during the NIH investigation, without any kind of charge being made against her, NU limited the work of Dr. Wu, partly closed her lab space, broke up her research team, reassigned her grants to her white male faculty colleagues, and left her isolated.

5. NU's treatment of Dr. Wu during the NIH investigation stands in stark contrast to the treatment of other universities towards their tenured faculty of similar stature, even in the case of male Chinese Americans targeted by the China Initiative. Case Western Reserve University, the University of California San Diego, and the Massachusetts Institute of Technology, among other institutions, supported their faculty to maintain their lab space, personnel, and research projects, while they were under NIH investigations.

6. In December 2023, after NIH's baseless investigation of her had concluded, NU did not reassign her grants back to her (with at least one of her NIH grants still active until August 31, 2025). Nor did NU restore the lab space taken away from her. Instead, NU, on its own, now placed even stronger restrictions to block Dr. Wu's return to her funded scientific work. In the

same December 17, 2023, letter announcing NU's understanding that the NIH investigation had ended, the Dean of NU's Feinberg School of Medicine cut her salary for lack of funding of her research during the NIH investigation, raised new requirements she had to meet to restore her funded status, gave her only a limited chance to meet them, and refused to assign back to her a prior grant that had been taken away from her but was still active until August 31, 2025.

7. In the next months, in contrast to the standard practice of supporting tenured faculty members for their longtime service, and even after Dr. Wu was cleared by the NIH, NU shut down part of the Wu Lab Space in February 2024, took away members of her research team, with no explanation, to make it harder for her to obtain new funding and force her out of her employment.

8. Nonetheless, in March and April 2024, despite NU's efforts to block her, Dr. Wu notified NU administrators including her Department Chair in the Neurology Department, about her active preparations to apply for the upcoming NIH funding deadline, which would be on June 5, 2024.

9. As Dr. Wu neared the June 5, 2024, grant deadline, Defendant NU now took stronger measures to prevent her return to work. On May 2, 2024, NU administrators misleadingly notified Dr. Wu that NU would indeed, finally, allow Dr. Wu to go ahead and apply for new NIH funding. Defendant NU deliberately misled Dr. Wu to believe that all was well.

10. To the contrary, just days later, on May 8, 2024, without warning, the same NU administrators abruptly announced the pending shutdown of the entire Wu Lab Space and then shut down the lab without explanation.

11. In doing so, NU ended any chance for Dr. Wu to resume her funded research and compete for grants with her white male colleagues. By piling on the actions described above, NU destroyed not only Dr. Wu's chances at NIH funding but also her research career.

12. The same NU administrators then took the extreme and outrageous act of evicting her from her office with physical force. At least in part because of NU's discriminatory treatment of her, during and after the NIH investigation, Dr. Wu had now acquired an emotional disability, which did not disqualify her from her work, but which NU used as a pretext to evict her.

13. On May 23, 2024, NU sent its University Police and City of Chicago Police to evict Dr. Wu from her office by force and placed her in handcuffs, in doing so, bruised her hands and wrists. NU then brought Dr. Wu, by force and against her will, to be admitted to the psychiatric unit of Northwestern Memorial Hospital without ever notifying any of her relatives nor consulting with any outside doctors. The physical assault directed by NU and the forced hospitalization sent Dr. Wu into a severe state of shock. After obtaining her release from Northwestern Hospital two weeks later, and with her career, her professional reputation, and her personal sense of safety shattered, Dr. Wu took her own life on July 10, 2024.

14. By the acts set out below, NU engaged in discrimination on the basis of race or national origin (Chinese), as NU sought to block the return of such a prominent Chinese American scientist whose race or national origin had already attracted the unwelcome attention of NIH, which was a major funding source of NU, and whose race or national origin might attract the same unwelcome attention again.

15. By the acts set forth below, Defendant NU also discriminated against Dr. Wu on the basis of her sex or gender. Dr. Wu was an outlier as a woman in the male-dominated medical research faculty of NU. Up until the investigation, Dr. Wu had been outcompeting many of her male colleagues in their own areas of interest. When the investigation started, NU took advantage of her predicament to turn over funded grants to her male colleagues who profited at her expense. Even after the investigation had ended, NU tried to delay her return to funded status and to

competing with her male colleagues. By doing so, the male-dominated administration of Defendant NU's Feinberg School benefitted the interests of her male colleagues with whom she competed for funding—both in the past as well as imminently over the ownership of her final remaining grant. Prior to closing the lab space in full, NU also used physical force intended especially to intimidate her as a woman, by evicting her from her own office in handcuffs, committing assault and battery, forcing her into a psychiatric facility by treating her disability as a form of “female hysteria,” and engaging in wanton and willful conduct that NU's male administrators have never shown toward her male colleagues.

16. By the acts set forth above, Defendant NU used her emotional distress which had become a disability by now for evicting her, handcuffing her, and forcing her into a psychiatric facility, where NU could monitor her, without notifying Dr. Wu's family nor permitting alternative treatment nor consultation with doctors independent of NU. Defendant NU took these actions not to help her or treat that distress, but to justify purging her from the faculty for reasons of her national origin and gender. All this unlawful discrimination by defendant NU was a substantial contributing factor in the decision of Dr. Wu to take her life.

17. The Plaintiff Estate of Dr. Wu seeks compensatory and punitive damages from Defendant NU for its unlawful conduct in destroying Dr. Wu's career and life and doing so because of her race, her gender, and the emotional disability that NU itself had helped to cause, as well as damages for the tortious conduct set out below.

### **Parties**

18. Plaintiff is the Estate of Dr. Jane Wu, which is now the legal representative under the Illinois Survival Act, 755 ILCS 5/27-6, for the claims that the late Dr. Jane Wu had against Defendant Northwestern University at the time of her death on July 10, 2024. The court appointed

executor of the Estate of Dr. Jane Wu is her daughter Elizabeth Rao, who has authorized this action on its behalf.

19. Defendant Northwestern University (“NU”) is a not-for-profit higher education institution doing business in the State of Illinois and, among its various graduate schools, maintains the Feinberg School of Medicine on its campus in Chicago, Illinois.

### **Facts**

20. Jane Wu was 60 years old when she took her life on July 10, 2024. Born in China and of Chinese ethnicity, she was a naturalized American citizen. She completed the process of becoming an American citizen in 2000. She lived and worked all of her adult life, nearly forty years, in the United States. At the start of NU’s investigation, Dr. Wu had been an American citizen for more than two decades.

21. Dr. Wu was a distinguished scientist and world-class academic. In 1986, when she was 22 years old, she completed her medical education at Shanghai Medical University and graduated as the valedictorian. Five years later in 1991, she completed her Ph.D. in Cancer Biology at Stanford University, before completing her post-doctoral training in biochemistry and molecular biology at Harvard University in 1994. She then joined the faculty at Washington University School of Medicine where, in 2001, she received tenure when she was 38 years old, younger than the average age for tenure at most top medical schools, including NU.

22. After two years as a tenured full professor with University Endowment at Vanderbilt University School of Medicine, Dr. Wu was actively recruited by Northwestern University in 2005 and offered a position as a tenured professor in the Neurology Department, with joint appointments at the Robert H. Lurie Comprehensive Cancer Center and Center for Genetic Medicine, all of which was under the NU Feinberg School of Medicine.

23. After accepting the tenured faculty position in 2005, Dr. Wu relocated her two young children, and the Wu Lab, including research materials and lab equipment, from Nashville Tennessee to Chicago, Illinois, in order to join Northwestern University, where she worked for the next 19 years. In 2007, she was given the additional honor of endowment, as the Charles Louis Mix Professor of Neurology at NU.

24. In Dr. Wu's professional life spanning thirty eight years in the United States, since starting her Ph.D. in Cancer Biology at Stanford University School of Medicine in 1986, she conducted world-class medical research for the public good.

25. As a faculty member and research scientist at Northwestern University, Dr. Wu led a neurology, molecular biology, and genetics laboratory at the Feinberg School of Medicine, the Wu Lab. She led her own laboratory space and research team. Before NU began to reassign Dr. Wu's grant funding to her colleagues, Dr. Wu had won continuous NIH funding since 1996. Her research team investigated the mechanisms that regulate pre-mRNA splicing and alternative splicing in genes essential for cell death neuronal function. Her lab sought to better understand tumor development and metastasis as well as the molecular biology of mRNA and neurodegeneration, including efforts to fight neurodegenerative diseases such as Alzheimer's disease and amyotrophic lateral sclerosis ("ALS").

26. Dr. Wu published over 176 peer-reviewed articles, three books, served on the editorial boards of academic journals, trained over 30 pre-doctoral and post-doctoral students, and has mentored numerous junior faculty members.

27. She chaired national and international conferences, including co-founding and chairing the prestigious Gordon Research Conference on Post-transcriptional Gene Regulation at Oxford University, a conference that continues until this day.



28. The world class quality of Dr. Wu's work was recognized time and again. She was elected to become an American Association for the Advancement of Science Fellow as well as a Member of the Association of American Physicians and of the American Society for Clinical Investigation, uncommon achievements for her ethnicity and gender.

29. Her research was exceptionally well funded. At the start of 2019, she had six NIH grants, for five of which she was the primary investigator or PI.

30. Dr. Wu was, by that standard, a star of the NU Feinberg School of Medicine. Most faculty members there had but one such grant, some had two, but for a female Asian professor like Dr. Wu to have six *concurrent* grants from NIH was extraordinary.

31. These six concurrent grants, which NU took from Dr. Wu because of the China Initiative of the first Trump Administration, include NIH R01NS107396 ("Grant 1," \$2,449,603, September 30, 2018, to June 30, 2023); NIH RF1AG068140 ("Grant 2," \$3,090,198, September 15, 2020, to August 31, 2025); NIH R56AG063934 ("Grant 3," \$764,709, September 30, 2019 to August 31, 2020); NIH R56AG061327 ("Grant 4," \$796,399, September 30, 2019, to September 30, 2020); NIH R01CA175360 ("Grant 5," \$2,184,325, March 2014 to February 2020); and NIH R01AG054008 ("Grant 6," approximately \$160,000 a year for Dr. Wu, August 1, 2016, to March 31, 2021). These grants amounted to more than \$2,000,000 in total.

32. Defendant NU took away all six of these grants because of a baseless investigation of Dr. Wu that was part of an investigation of Chinese American scientists initiated by the first Trump Administration because of their national origin or ethnicity. NU knew the investigation was racially motivated and baseless, especially in the case of Dr. Wu.

33. It would have been absurd to think that Dr. Wu was engaged in any theft of intellectual property or of unlawfully aiding researchers in China, the false pretext given for the

China Initiative, as all of her work was basic research and entirely in the public domain. While she had occasional international contacts with academics, including in Argentina, Britain, Canada, China, France, Germany, Israel, Italy, and Japan, all of these were public and had been approved by NU. Dr. Wu never profited from any such contacts.

34. From 2019-2023, Dr. Wu had repeatedly provided clear evidence that for her interactions in China, Dr. Wu had specifically sought and obtained approval from NU administrators in the first place. Indeed, even after five years of investigation, no charges were ever brought against Dr. Wu, because she had done nothing wrong.

35. Nonetheless, because of her race and national origin, from 2019 to 2023, NU kept Dr. Wu isolated and alone and stigmatized as a security risk, solely because of her race or national origin. NU did nothing to support her nor help lift the racial stigma placed over Dr. Wu despite her obvious innocence and the enormous funding her work had brought to NU.

36. By contrast, other academic research centers, including the Massachusetts Institute of Technology, the University of California San Diego, and Case Western Reserve University, supported their own male Chinese American scientists in their efforts to continue their work. Dr. Wu had no such support from the Dean and the Department Chairman (both white men), nor her white male colleagues at the Feinberg School and was under huge stress from isolation and unfounded punishment.

37. Far from supporting her, and aware it was a racially based sham investigation, Defendant NU took advantage of Dr. Wu's predicament to redistribute Dr. Wu's multiple grants to her white male colleagues, who dominated the Feinberg School's faculty.

38. NU's prejudice against and isolation of Dr. Wu began officially at noon on January 29, 2019, when the NU Feinberg Associate Dean Rex Chisholm and NU Feinberg Vice Dean for

Faculty Affairs Bill Lowe summoned Dr. Wu to a meeting with just a few hours' notice. Dr. Wu asked what the meeting might be about, but they refused to disclose details, beyond that they would discuss an inquiry that was received from NIH. Still, Dr. Wu rearranged her meetings in order to meet with Rex Chisholm and Bill Lowe at 2:30 p.m. that day. Dr. Wu was told that she was being investigated and was asked to write a "narrative related to activities in China" though NU had previously approved these same activities.

39. On February 7, 2019, NU published "Guidance Regarding Foreign Influence and Involvement in University Research" guidelines, emailing over 300 faculty members and department heads.

40. On September 12, 2019, Rex Chisholm, Bill Lowe and now summoned Dr. Wu to another meeting "to discuss grants," adding Department Chair Dimitri Krainc, who also in turn added Bryan Runkel.

41. On December 6, 2019, Dimitri Krainc informed Dr. Wu that her NIH grants would be placed on hold and suggested that she contact Rex Chisholm for a meeting.

42. On December 9, 2019, Sonya Bowen, Senior Research Administrator of the Department of Neurology, asked for a call with Dr. Wu. Dr. Wu subsequently summarized her NIH grants and remaining balances, which totaled over \$1,000,000.

43. On January 16, 2020, Rex Chisholm asked Dr. Wu to meet again. On January 20, 2020, Dr. Wu agreed to a search of her computers and emails and to write a final statement confirming her NU-approved collaborations with researchers in China. She promptly wrote and emailed this letter on January 22, 2020.

44. On February 24, 2020, NU circulated an update to their February 2019 policies, outlining additional new disclosure requirements that NU had not previously necessitated.

45. When Dr. Wu submitted a new funding application in May 2020, NU Director of Conflict of Interest Kate Cosgrove Booth emphasized “the NIH is requesting transparency on these matters far beyond what has been the standard practice prior to 2018.” Consistently ready to comply with new University policies towards funding applications, Dr. Wu updated her biosketch as requested.

46. On August 25, 2020, while Dr. Wu was in the Wu lab, she experienced a sudden loss of sight in the right eye, which was confirmed to be a retinal stroke.

47. On August 31, 2020, Dr. Bob Vassar called Dr. Wu to ask about her foreign affiliations. She wrote to assure him that she had done nothing wrong, though the University-wide press releases had already begun to stoke suspicion against Chinese faculty members. Within the Neurology Department, Dr. Wu specifically was targeted as its only endowed Chinese American faculty member.

48. On or about October 2, 2020, NU prohibited Dr. Wu from making any new grant applications and began reassigning her grants.

49. While NIH’s investigation was still in progress, NU formally prohibited Dr. Wu from making new applications for funded research. Throughout this time, Dr. Wu watched helplessly as NU reassigned her own active grants to two of her white male colleagues who agreed in writing to the temporary arrangement until the investigation was over.

50. Under the norm, this meant that, once the investigation was finished, the grants should be returned to Dr. Wu. However, NU never returned these grants to Dr. Wu even after the investigation was over.

51. At the time of forced transfer, at least two of Dr. Wu’s reassigned grants were some of the largest grants held by these male colleagues.

52. Since the beginning of questioning in January 2019, NU administrators and counsel assured Dr. Wu time and again that their questioning was nearly complete, or for instance that the next written statement would be the “final” one.

53. In fact, NU began to disperse members of Dr. Wu’s research team, making clear that her return was in jeopardy, though it was certain or near certain that the investigation was a sham and racially based.

54. In 2021 and 2022, Dr. Wu wrote a letter (titled “Conflicts between people”) stating that: “Because science and research are my an extremely important part of my life, having been ordered not to participate in any of our major research projects is a tremendous torture and stress to me. Such stress is a major factor that led to my retinal stroke.”

55. In February 2022, the Biden Administration’s Department of Justice ended the China Initiative as a criminal investigation. By that point, no convictions of anyone for espionage or theft of intellectual property had been proven or retained.

56. However, after February 2022, despite the end of the China Initiative, Defendant NU left Dr. Wu in limbo without any assistance while her male colleagues continued controlling the NIH grants that Dr. Wu had been awarded. At this point, Defendant NU was aware that there was no basis for any further investigation of Dr. Wu.

57. Meanwhile, Defendant NU took retaliatory measures against her because her nationality had attracted unwelcome attention from the government. While cutting her off from the grant funding that she had won, and prematurely cutting her space and personnel, NU still had not made any charges nor accusations, nor had any basis for doing so.

58. Specifically, on July 19, 2023, NU counsel Michael Vernick notified Dr. Wu that “NIH has asked Northwestern to either propose a replacement PI for Grant No. R01 NS107396,

for which Dr. Wu currently serves as PI, or submit a request for bilateral termination. The University has opted to request a bilateral termination and is going to move forward with that action.”

59. NU could have held off formal termination by filing what is known as a NCE (No Cost Extension) for this grant (Grant 1). When Dr. Wu asked Rex Chisholm to discuss the reason for NU’s decision to terminate the grant at this point rather than filing for an NCE, Rex Chisholm simply repeated verbatim what Michael Vernick had stated, refusing to provide an explanation.

60. By or before December 17, 2023, though the date is unknown to the Plaintiff Estate, NU received word that the NIH administrative investigation of Dr. Wu had ended.

61. By a letter of December 17, 2023, NU notified Dr. Wu that she could resume her work under certain conditions, though Dr. Wu had done nothing wrong, and been charged with nothing, to justify placing conditions on her return.

62. In this letter of December 17, 2023, the Dean of the Feinberg School, Dr. Neilson, writes as follows:

“I write to let you know that, while we understand the NIH investigation into your research connections with China has concluded, there will be no exoneration letter forthcoming from NIH.

“Although I understand you may be allowed to apply for NIH grants later this Spring, such reinstatement will be contingent on your successful completion of training programs related to Conflict of Interest, Responsible Conduct of Research (RCR), and Bayh-Dole and iEdison reporting obligations.

“In addition, for two years after any reinstatement you will also be required to review all funding applications with your Department Chair and check in with the Innovation and New Ventures Office once per quarter to ensure that all inventions are timely disclosed.”

63. Dr. Neilson fails to explain how Dr. Wu needed “exoneration” when she had not been charged with anything. NU’s sanction of Dr. Wu is as follows:

“Since you have not applied for other types of funding over the last several years, the school of medicine now considers you research inactive. As is our policy with all research inactive regular faculty, we will begin to reduce your salary by 10% every year. Such reductions will continue until you return to funded status or are at the professor base salary of \$90,000. The initial 10% reduction will begin with your January paycheck.”

64. While Defendant NU told Dr. Wu her research was “inactive,” Defendant NU knew that one of her six grants, Grant 2, which at the date of this complaint is newly numbered as 4R01AG068140-02, was still active in the NU Neurology Department. NU could have but did not return the grant to her but instead continued to discriminate against her in favor of the white males to whom all her grants had been previously assigned.

65. Defendant NU was also aware that NU itself had made the decision to terminate Grant 1, just a few months prior. NU could have allowed but did not allow Dr. Wu to continue working on Grant 1.

66. While NU was aware that it is impossible to get an “exoneration letter” when Dr. Wu had never been accused of anything at all, Dr. Neilson used the pretext of no NIH exoneration to imply she was potentially guilty of something, to create obstacles to her return, and to cause Dr. Wu further stress.

67. While being isolated and receiving no support from NU from late 2019 through 2023, Dr. Wu published at least nine new research papers during the period that NU had limited her access to her own funding, personnel and resources. During the NIH investigation, Dr. Wu had given at least seven seminars or lectures as an invited speaker: at The Les Turner Symposium on ALS, at John Hopkins University, at the School of Medicine of Creighton University, at Loyola University Chicago, at Texas Tech University Health Sciences Services Center, at the University of California San Diego Cancer Center, and at the University of California San Diego Department of Bioengineering.

68. After years of isolating her, stigmatizing her as a security risk, demanding responses on question after question, and adding hurdles to her return even after NIH had dropped an investigation for which it never gave a basis—NU now required that Dr. Wu in the next few months obtain new grants even while still under NU restrictions or face even more reductions in her salary. By adding additional financial punishment, and by creating unnecessary and unreasonable deadlines, Defendant NU intentionally increased the pressure to keep Dr. Wu from returning to her funded research work.

69. NU, however, had no intent on allowing her to meet this new schedule or return to funded work, as now set forth below.

70. On January 31, 2024, NU began Dr. Wu's unjustified pay cut.

71. NU used the pay cut as a threat to her employment status.

72. In February 2024, NU then closed a crucial part of her lab space, which was an important basis for receiving new grants that NU required. NU knew this was a crippling blow to her return to the funded status it was demanding.

73. NU closed the part of the Wu Lab Space, as it was known, on the third floor of NU's Ward Building. NU offered no explanation as to why it would do so when keeping that space was crucial to meeting NU's requirement that Dr. Wu return to funded research status.

74. NU then also disassembled, dispersed, and reassigned her research team, the members of which had previously assisted with Dr. Wu's work.

75. NU would never have taken, and never has taken, such a punitive action against any white male colleague who had the ability of Dr. Wu to obtain research funding.

76. In this respect, the treatment of Dr. Wu by the Feinberg School administration is also consistent with the Feinberg School's lack of support for other qualified women scientists.



77. Many women scientists depart from the Feinberg School of Medicine because of such disparate treatment based on gender, either pushed out or leaving voluntarily because of their experience of the school as a sexually hostile workplace, at least for scientific researchers.

78. NU's decision to reduce the Wu Lab Space made it harder for Dr. Wu to compete with her white male colleagues for the kind of grants that her status and reputation had enabled her to obtain in the past.

79. NU's decision to reduce the Wu Lab Space also risked long term damage to her research materials, which had to be unnecessarily removed and stored elsewhere. These materials were heavily refrigerated, kept in incubators, and collected by Dr. Wu over the course of a lifetime's worth of work.

80. The unnecessary removal of the materials inflicted severe emotional distress upon Dr. Wu, as it threatened the value of a lifetime of work and hindered her from applying for new funded research.

81. As a result of the now apparent NU actions to block her from resuming her work and closing her lab space after she had gone through a long, racially targeted, sham investigation, Dr. Wu naturally tried harder than ever to protect her life's work from being ruined. She now showed signs of depression and obsessive behavior.

82. While her depression had become a health-related condition and now constituted a disability, Dr. Wu remained qualified in all respects for continuing her important scientific work.

83. In addition to suffering now from depression, Dr. Wu also suffered from a physical disability, loss of vision, resulting from a stroke she suffered while under the severe stress of the unfounded investigation. However, she remained able and dedicated to meeting new NU and upcoming NIH application deadlines.

84. On March 20, 2024, Dr. Dmitri Krainc, the chair of the Neurology Department, demanded Dr. Wu that she needed to get at least private foundation grants soon. This unreasonable demand intentionally obscured the fact that NU should have rightfully returned Dr. Wu's existing grant back to her. Other institutions routinely provided university sources of funding to Chinese American professors under the same situation, instead of demanding the wrongly accused to seek private funds. Even if she had obtained private funding within this impossibly short time window, it is widely known that private funds would never be able to match NIH funding. Defendant NU's empty demand was yet another unreasonable obstacle set up to prevent Dr. Wu from resuming her work.

85. Nonetheless, Dr. Wu was actively preparing her next NIH submission. Because NU had stated in the December letter that NU would allow Dr. Wu to resume applications "this Spring," Dr. Wu reasonably prepared for the June 2024 deadline, the first NIH grant cycle that NU would allow her to apply for since the investigation had concluded.

86. In March and April of 2024, Dr. Wu updated NU administrators and colleagues, including Krainc, Runkel, and Vassar, detailing her preparations to submit to the June NIH deadline. Clearly, she was actively preparing a robust grant submission. She requested her personnel back from their reassignment to her colleagues, and she detailed the aims and content of her grant submission.

87. By these actions, NU became aware of Dr. Wu's intention, ability, and plans to rebuild the Wu Lab.

88. Defendant NU was also aware of her requests to reclaim the remaining grant, Grant 2, which had been assigned to her male colleague—which at the date of this complaint, in fact

continues to fund research in his lab and is scheduled to continue through the end of August of this year, 2025.

89. Defendant NU was also aware of Dr. Wu's plan to reapply for a new grant replacing her previous grant that had been bilaterally terminated by NU and NIH a year prior in July 2023. Despite Dr. Wu's requests for more information, NU provided no explanation why they should choose to terminate the final grant for which she was still controlling as the key researcher.

90. Beginning in May 2024, Defendant NU took the final steps to end her career, by threatening a full shutdown of her remaining lab space, physically evicting her from her office when she requested an explanation, and thereby ending any prospect of her intended applications for new funding, due shortly.

91. On May 1, 2024, Dr. Wu sent an email to her department chair with her proposed grant aims and intentions for her new funding application for the approaching June 5, 2024, NIH deadline.

92. Dr. Krainc chose to reassure her, emailing back: "This looks good." Dr. Krainc then emailed the next day: "I'm letting you know I received the following from Mike Lauer at NIH. We understand that Dr. Wu is now in good standing at NU and therefore eligible to be designated by NU as key personnel on projects."

93. However, this email was seriously misleading, as Defendant NU had no intention of allowing Dr. Wu to return.

94. On May 8, 2024, Dr. Krainc announced that the Feinberg School would soon close permanently the remaining Wu Lab Space, which Dr. Wu had been trying to protect.

95. This revoked the fundamental prerequisite—research space—for Dr. Wu's submission to the June 5, 2024, NIH deadline.

96. NU gave no reason for completely shutting down her lab space while she was on the verge of making a submission as required by June 5, 2024.

97. NU created this new obstacle in order to deliberately block Dr. Wu from what the NU administrators were fully aware was the first grant cycle in which Dr. Wu was eligible to apply in the past five years.

98. With Dr. Krainc's announcement and the above actions, NU clearly signaled that NU intended to prevent her return to funded status. This destroyed any hope Dr. Wu had left of recovering her NIH funding, returning to her research, or resuming her distinguished scientific career.

99. On May 13, 2024, Dr. Neilson confirmed Dr. Krainc's decision: "The school will need to repurpose your space for other investigators. Your laboratory will be packed and stored on campus this summer."

100. Seeking to avoid the destruction of her research materials, Dr. Wu wrote to Dr. Neilson begging to keep the lab space open:

"Dear Dr. Neilson, I apologize for not being able to reply sooner. Although my team is small, we are working hard and making good progress. We are actively preparing a NIH grant application for submission soon. On behalf of my team, I respectfully request that we are allowed to continue our work in the current lab space so that we have the environment necessary for applying for NIH grants and other external funding. Your support is greatly appreciated."

101. Specifically reminded of Dr. Wu's plan to submit by the June 5, 2024, deadline, Dr. Neilson did not bother to respond. Fully aware of the deadline for the grant submission, Defendant NU now took an even more drastic step to prevent her return to funded status.

102. Shattered by the emails of May 8 and May 13, 2024, still determined to meet the June 5, 2024, deadline, Dr. Wu spent time in her office, trying to protect her research materials from being damaged or the integrity of the materials compromised. Dr. Wu had good reason to

fear that, after the announced closing of her lab space, her life's work was at risk. However, Defendant NU took this as a pretext to stop her altogether.

103. On May 23, 2024, by the apparent direction of the Feinberg School, officers from the NU campus police and the Chicago police department and fire department came to Dr. Wu's office.

104. The NU and City of Chicago officers used gratuitous and excessive physical force to seize Dr. Wu, who was a physically diminutive person, 5'2" and 99 pounds, and pull her out of her office.

105. NU and City of Chicago police placed Dr. Wu in handcuffs and inflicted serious bruises on her hands and wrists.

106. There was no excuse for such use of force on such a diminutive person who was in any case both emotionally and physically disabled as well as physically weak. NU was fully aware of this physical disability and weakened condition but still used this needless force. The assault and battery sent her into a severe state of shock.

107. NU police, in the presence of Dr. Krainc, then took Dr. Wu to the main emergency room of Northwestern Memorial Hospital. NU then had her admitted to NU's Stone Institute of Psychiatry.

108. At no point in this process of the eviction, nor forced hospitalization, did NU administrators officially reach out to Dr. Wu's family members.

109. In forcibly hospitalizing Dr. Wu, NU administrators did not consult with doctors independent of NU at any time, inflicting damage while creating clear conflicts of interest.

110. Though held against her will, Dr. Wu had the presence of mind not to resist and agreed to voluntary admission. By agreeing to be voluntarily admitted to the Stone Institute, she

had the capacity to release herself. Dr. Wu was told that if she resisted and was admitted involuntarily by Dr. Krainc and NU, she may need a court order to obtain her release.

111. Dr. Wu had no prior history of commitment to psychiatric in-patient wards.

112. Dr. Wu was also now in a state of severe shock from the assault and battery and her false imprisonment.

113. Northwestern Hospital was also the worst possible place for Dr. Wu to be taken, given the close relationship between the Northwestern Feinberg School of Medicine and Northwestern Memorial Hospital.

114. Dr. Krainc, who was present at all or part of the NU eviction, even used his position at the Feinberg School to come into the hospital outside of visiting hours and attempted to have a private meeting with her.

115. Dr. Wu's family learned of the proposed meeting and stopped it, but the presence of Dr. Krainc in the waiting area further inflicted extreme emotional distress upon Dr. Wu, who was already in a state of shock.

116. Consistent with Dr. Wu's fear that NU administrators had special access to NU Stone Institute doctors, during Dr. Wu's hospitalization and against her family's objections, Stone Institute doctors suggested multiple times that Dr. Wu speak with Dr. Krainc and other University leadership as a sign of her mental wellness, upon which her release depended. Her family continued to insist that Dr. Wu only interact with family during this vulnerable time.

117. Dr. Wu obtained her release from the Stone Institute ten days later.

118. She was physically detained inside the psychiatric ward until noon on June 6, 2024, one day after the June 5 NIH grant deadline. During her detention inside NU Memorial Hospital, she was barred access to her computer, her phone, the internet, her research files, and all personal

items including her own clothing. NU administrators would have been well aware of the June 5th deadline. Going as far as to physically detain her until after the NIH deadline had passed, NU's actions successfully eliminated Dr. Wu's final opportunity to apply for new funding that might allow her to rebuild the Wu Lab.

119. An NU staff member at the Stone Institute forced Dr. Wu to consent to taking a medical leave as a condition of her release. NU administrators advised that if Dr. Wu refused to request medical leave, doctors would not be advised to grant her release.

120. Such a forced medical leave further blocked her return from access to her office, the research building and premises, and her research materials.

121. The NU administrators who mistreated her had institutional ties to the psychiatric facility. By using NU's own hospital to hospitalize a faculty member without independent medical opinion, without notifying and seeking agreement from family members and consent from Dr. Wu, NU improperly exerted its power as an employer, ignoring the blatant conflict of interest, to deny Dr. Wu a non-biased medical opinion and to cause a sense of hopelessness and inescapable punishment. NU harassed, emotionally tortured and medically damaged Dr. Wu irreparably.

122. A few weeks later, on July 10, 2024, still traumatized by NU's conduct, Dr. Wu took her own life.

123. The unlawful discriminatory acts by NU on the basis of Dr. Wu's race, gender, and disability shattered her career and were a substantial factor in her decision to end her life.

124. Subsequently, NU engaged in other hostile and retaliatory acts to the Estate of Dr. Jane Wu, including refusal to allow inspection of the personnel records of Dr. Wu for evidence of discrimination.

125. On December 26, 2024, the Plaintiff Estate of Dr. Jane Wu formally requested that the NU Office of Civil Rights investigate Defendant NU's treatment of Dr. Wu and discrimination based on race or national origin, gender, and disability. The Plaintiff Estate copied NU's General Counsel with the charge.

126. Defendant NU's Office of Civil Rights confirmed receipt of the letter on January 3, 2025.

127. On January 15, 2025, the Plaintiff Estate of Dr. Jane Wu asked the Office of Civil Rights to indicate whether it intended to investigate the charges of unlawful discrimination based on race or national origin, gender, and disability.

128. Months later, by an email of April 2, 2025, NU's Office of Civil Rights replied and notified the Plaintiff Estate of Dr. Jane Wu that NU's Office of Civil Rights would not investigate the charge because Dr. Wu was now deceased.

### **Count I: Discrimination Based on Race and National Origin**

129. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 128 above.

130. By the acts set forth above, and in violation of the Illinois Human Rights Act, 775 ILCS 5/1-01, *et seq.*, and because of her race or national origin and ethnicity (Chinese), Defendant NU unlawfully barred Dr. Wu from resuming her prior scientific research work and prior career as a faculty member at the Feinberg School of Medicine.

131. By the same acts set forth above, and in violation of the Illinois Human Rights Act, 775 ILCS 5/1-01, *et seq.*, and because of her race or national origin and ethnicity (Chinese), Defendant NU imposed restrictions and conditions intended to and did in fact keep Dr. Wu from resuming her prior scientific research work and prior career.



132. By the acts set forth above, and in violation of the Illinois Human Rights Act, and because of her race or national origin (Chinese) Defendant NU constructively discharged Dr. Wu and terminated her employment as a faculty member at the Feinberg School of Medicine.

133. The unlawful acts of discrimination because of her race or national origin with respect to her employment were a substantial factor in the decision of Dr. Wu to end her life.

134. As set forth above, starting in 2019 and up to the time of her death, Defendant NU maintained a hostile workplace to academics and scientists of Chinese birth or origin like Dr. Wu, because of Defendant NU's interest in maintaining its relationships with NIH.

135. As set forth above, Defendant NU maintained such a racially hostile workplace during an NIH investigation that NU knew to be both baseless and motivated by race or nationality. Defendant NU did so by isolating Dr. Wu within the faculty, taking away her grants, assigning her grants to her white colleagues, and interrogating her again and again.

136. Then, as set forth above, after the investigation ended, Defendant NU refused to let Dr. Wu resume even the still active grant previously taken away from her. Defendant NU continued to treat her as suspect, though NU knew she had done nothing wrong, cut her pay as a sanction in effect for being investigated and barred from research, partly closed the Wu Lab Space, further dispersed her research team, and placed new special conditions intended just for her that were difficult or impossible to keep her to meet.

137. As further set out above, on May 8, 2024, so as to stop her from proceeding with applications for additional new funding from the NIH, the first of which was due on June 5, 2024, Defendant NU announced a plan to completely shut down the entire Wu Lab Space. A On May 13, 2024, also without notice, Dr. Neilsen ordered that her research materials—her life's work—be packed and stored. Dr. Krainc and Dr. Neilsen ignored answering her email begging for just a

minimal amount of more time to file her grant applications by June 5, 2024. By such actions, NU destroyed her ability to apply for the new funding, which NU itself was insisting upon as a condition of employment

138. Finally, not content with this action, NU went even further and evicted her from her own office as if she were a trespasser, when she was at the very least still properly on the premises as the final closure of the Wu Lab had not yet occurred, and then forced her into a psychiatric hospital.

139. By these and other acts set forth in detail in this complaint, and in violation of the Illinois Human Rights Act, NU was able to force Dr. Wu out of the medical research faculty, because race or national origin had attracted unwelcome attention from a major funding source, NIH, and whose race or national origin might do so again, and might threaten or prejudice Defendant NU's ability to continue receiving funding from NIH and the federal government.

140. Unable to terminate such a distinguished and tenured faculty member for cause, NU sought to take every action possible to raise roadblocks to new funding and to demoralize and force her off the faculty, including but not limited to the forcible assault and battery and commitment to a psychiatric facility.

141. By these and all the other discriminatory acts set forth above including the brutal eviction from her office and commitment to a psychiatric facility, against her will, and without notice to her family, Defendant NU engaged in further discriminatory acts that it would never have employed or has employed against a white faculty member

142. By all the acts set out above, and in violation of the Illinois Human Rights Act, NU unlawfully discriminated against Dr. Wu with respect to her employment on the basis of her race or national origin and ethnicity by forcing her off the faculty and destroying her distinguished

career. This discrimination was a substantial factor in her decision to take her life shortly after her release from Northwestern Memorial Hospital.

### **Count II: Discrimination Based on Sex or Gender**

143. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 142 above.

144. In addition, by the acts above, Defendant NU also engaged in unlawful discrimination against Dr. Wu with respect to her employment because of her sex or gender and maintained a sexually hostile workplace by disparate treatment of her as a woman who was an outlier in a male dominated workplace, in which she greatly outperformed many of her male colleagues in obtaining funding in their respective areas of research.

145. In violation of the Illinois Human Rights Act, Defendant NU has long maintained a sexually hostile workplace in the treatment of women scientists in medical research at the Feinberg School of Medicine.

146. This sexually hostile workplace at the Feinberg School of Medicine has resulted in the unusual departure or exodus of many qualified women research scientists from the Feinberg School in recent years, departures that were either forced or voluntary. The medical research part of the Feinberg School faculty is and has long been dominated by men, who are more comfortable working with other male colleagues than with colleagues who are women like Dr. Wu.

147. As set forth above, at the time that Defendant NU began to obstruct Dr. Wu's research and seize her funding and team in 2019, she had six active funded grants while her male colleagues typically had one or two. Resentful of her ability to outcompete her colleagues, NU's male-dominated Feinberg School took away those grants, assigned them to their white male colleagues, who profited from Dr. Wu's predicament. NU did not even allow her to resume the grant, Grant 2, that was still active after the investigation was over, or continue a grant, Grant 1, under her name until she could return.

148. The grants that NU had wrested from Dr. Wu were used to support other people and other research projects. This is in contrast to other universities who had supported male Chinese American professors in the same situation of being investigated under the China Initiative.

149. After the investigation ended, NU sought to block her from returning to a position where she might again compete with her colleagues for funding in areas related to their own interests and for which they were seeking funding.

150. NU male administrators also used a “hysterical female” trope to stigmatize Dr. Wu and force her hospitalization as NU would not have done and has never done with her male colleagues.

151. Mobilizing NU campus police and utilizing the Chicago police and fire departments, Defendant NU used this trope and the emotional distress that she exhibited as an excuse for this humiliating eviction and physical mistreatment.

152. The unlawful discrimination against Dr. Wu because of her sex or gender, despite her scientific renown, including the attempt by NU to destroy her career, was a substantial factor in her decision to take her life.

153. By all the acts set forth above, and in violation of the Illinois Human Rights Act, and in addition the discrimination based on race or national origin set forth in Count I above, Defendant NU discriminated against Dr. Wu in her employment based on sex or gender by conduct that Defendant NU undertook against her because she was a woman and that NU would never have used, and has never used, against any male member of the faculty.

### **Count III: Disability Discrimination**

154. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 153.

155. In addition, and in further violation of the Illinois Human Rights Act, and in evicting her from the premises and forcing her into a psychiatric facility, Defendant NU also

unlawfully discriminated against Dr. Wu with respect to her employment because of an emotional disability.

156. As set forth above, while Dr. Wu had no history of psychiatric illness, a disabling degree of emotional distress arose during the racially based investigation and NU's attempt to remove her, and that distress affected her ability to take care of herself and was a disability within the meaning of the Illinois Human Rights Act.

157. Rather than accommodate that disability or limitation because of her depression and anxiety, as NU could reasonably have done, as it was likely to have been temporary, NU seized on the disability as a justification for evicting her from the office in the most brutal possible manner and forcing her hospitalization and constructive discharge from the faculty.

158. Specifically on May 23, 2024, as set forth above and without justification or cause, Defendant NU called upon campus police and Chicago Police Department to evict her from her office, though she had a right to be on the premises, to handcuff her, and to bruise her physically. The handcuffing and eviction by force sent Dr. Wu into a severe state of shock. NU worsened that shock by placing her in a hospital where she was pressured to meet with Dr. Krainc and under the watch of physicians with connections to the very institution trying to fire and disgrace her. Defendant NU deliberately put her in a situation where Dr. Wu could not speak freely. NU's unlawful actions increased her emotional distress and were a substantial factor in her decision to take her life.

159. Defendant NU took these actions not to help Dr. Wu with such disability as she suffered, or to relieve her emotional distress, but to increase it. NU used it as an excuse or pretext to force her from the faculty after the China Initiative investigation ended.

160. At all times, despite her mental and physical disability, Dr. Wu was qualified and able to perform the same high quality of work that had made her such a distinguished scientist.

161. By these and other acts set forth above, Defendant NU unlawfully discriminated against Dr. Wu with respect to her employment on the basis of a disability in violation of the Illinois Human Rights Act.

#### **Count IV: Wanton and Willful Conduct**

162. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 161 above.

163. Willful and wanton misconduct under the laws of Illinois is a course of action in which the defendant shows either actual or deliberate intent to harm or, if not intentional, shows an utter indifference to or conscious disregard for the rights and safety of others.

164. By the acts set forth above, and by using police to evict Dr. Wu from her own office under the circumstances here, and then by forcing her into a psychiatric facility to ensure that she could not submit a grant application by June 5, 2024, and by keeping her effectively imprisoned in the hospital and under the care of doctors to whom her employer Feinberg School had access and special relationships, so that she could not speak freely while in the hospital, NU acted either deliberately or with conscious disregard for her safety and wellbeing.

165. Such willful and wanton misconduct jeopardized the safety of Dr. Wu, who was already suffering from anxiety and depression, inflicted even greater emotional distress, and was a substantial factor that contributed to her decision to take her own life. The Plaintiff Estate of Dr. Wu seeks compensatory and punitive damages for such wanton and willful misconduct.

#### **Count V: Assault and Battery**

166. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 165 above.

167. By the acts set forth above, on or about May 23, 2023, Defendant NU through campus and City of Chicago police authorized and engaged in an assault and battery upon the

person of Dr. Wu, including but not limited to the use of handcuffs, which caused bruising on her wrists and hands, and which caused her pain and sent her into a severe state of shock. The Plaintiff Estate of Dr. Wu seeks compensatory and punitive damages for such assault and battery.

#### **Count VI: False Imprisonment**

168. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 167 above.

169. By the acts set forth above by NU to evict Dr. Wu from her office on May 23, 2024, including but not limited to use of handcuffs, and detaining her against her will, Defendant NU falsely and tortiously imprisoned Dr. Wu.

170. Furthermore, Defendant NU then forced Dr. Wu against her will to go to Northwestern Memorial Hospital, where she was kept long enough to make sure that she missed the NIH deadline of June 5, 2024, for making the application for funded research as she had told NU that she intended to do.

171. Defendant NU left Dr. Wu with no true choice other than to consent to her commitment to Northwestern Memorial Hospital as she would have been involuntarily committed otherwise.

172. The initial false imprisonment and later confinement to Northwestern Memorial Hospital created severe emotional distress in addition to the shock and trauma that Dr. Wu had already suffered from the eviction from her own office.

#### **Count VII: Breach of Contract.**

173. Plaintiff Estate of Dr. Jane Wu incorporates paragraphs 1 through 172 above.

174. During the period covered above, NU maintained contractual guarantees against acts of unlawful discrimination, similar or identical to those set forth in the Illinois Human Rights Act.

175. These guarantees are set out in the Policy on Discrimination, Harassment, and Sexual Misconduct, the relevant portion of which is attached as Exhibit A hereto.

176. These guarantees against discrimination made unlawful by the Illinois Human Rights Act are contractually enforceable and part of the legal consideration due from NU to its faculty including persons such as Dr. Wu who choose to work at NU.

177. By the acts set forth in Counts I, II, and III above, and the discriminatory acts set forth therein, NU has engaged in a material breach of the Policy on Discrimination, Harassment, and Sexual Misconduct, and is liable for any economic or monetary loss to Dr. Wu resulting from such breach.

WHEREFORE Plaintiff Estate of Dr. Jane Wu prays this Court to set down this case for trial by jury on all claims and to:

- a) Declare that under the Illinois Survival Act, the Plaintiff Estate of Dr. Jane Wu by its executor Elizabeth Rao may bring this action for any claims that were available to Dr. Wu to bring just prior to her taking her life on July 10, 2024;
- b) Grant the Plaintiff Estate of Dr. Jane Wu compensatory and punitive damages for the violation of her right under the Illinois Human Rights Act to be free of discrimination based on her race or national origin and ethnicity with respect to her employment, as set out in Count I above;
- c) Grant the Plaintiff Estate of Dr. Jane Wu compensatory and punitive damages for the violation of her right under the Illinois Human Rights Act to be free of discrimination based on her gender with respect to her employment, as set out in Count II above;
- d) Grant the Plaintiff Estate of Dr. Jane Wu compensatory damages for the violation



of her right under the Illinois Human Rights Act to be free of discrimination because of her disability with respect to her employment, including her right to a reasonable accommodation to her disability that Defendant refused to give her,

- e) Grant the Plaintiff Estate of Dr. Jane Wu compensatory and punitive damages for wanton and willful misconduct toward Dr. Wu in conscious and deliberate disregard of her right to safety and wellbeing, as set forth in Count IV above;
- f) Grant the Plaintiff Estate of Dr. Jane Wu compensatory and punitive damages for the assault and battery upon her person as set forth in Count V above;
- g) Grant the Estate of Dr. Jane Wu compensatory and punitive damages for false imprisonment and forced imprisonment as set forth in Count VI above;
- h) Grant the Plaintiff Estate of Dr. Jane Wu compensatory damages for breach of contract as set out and incorporated in Count VII above;
- i) Grant the Estate of Dr. Jane Wu its legal fees and costs under Counts I, II, and III above and such other relief as may be appropriate under those and all counts.

Date: June 23, 2025

By: /s/ Thomas H. Geoghegan  
One of Plaintiff's Attorneys

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