ELIZABETH CHIKA TIPPETT

Professor University of Oregon School of Law 1221 University of Oregon (541) 346-8938 tippett@uoregon.edu

ACADEMIC & PROFESSIONAL EXPERIENCE

University of Oregon School of Law, Eugene, OR

Professor and James O. and Alfred T. Goodwin Senior Fellow (2023 - present)

Associate Professor (2017 - 2023)

Assistant Professor (2012 – 2017)

Faculty Co-Director, Conflict & Dispute Resolution Master's Program (2015 – 2020)

Affiliated Faculty, Center for Cyber Security and Privacy

Affiliated Faculty, Center for the Study of Women in Society

Courses: Negotiation, Employment Law, Torts, Alternative Dispute Resolution, Legal Secrets (Undergraduate)

Wilson Sonsini Goodrich & Rosati, Palo Alto, CA & New York, NY

Associate Attorney (2006 - 2012)

Harvard Law School, Cambridge, MA

Teaching Assistant, Deal Design and Implementation (2006) Teaching Assistant, Negotiation Workshop (2002 & 2003)

Program on Negotiation at Harvard Law School, Cambridge, MA

Teaching Team, Program of Instruction for Lawyers (2002 & 2005) Teaching Assistant, PON Seminars (2001 – 2002)

Harvard Negotiation Project, Cambridge, MA

Research Assistant, Professor Emeritus Roger Fisher (1999 – 2006)

International Bridges to Justice, Geneva, Switzerland

Legal Intern, Summer 2004

Triad Consulting, Cambridge, MA

Associate (2002 - 2003)

EDUCATION

Harvard Law School, Cambridge, MA

J.D., 2006

Journal: Harvard Negotiation Law Review, Article Editor Honors: Hewlett Law and Negotiation Research Fellow

Harvard College, Cambridge, MA

B.A. Social Studies, magna cum laude, 2002

Honors: Phi Beta Kappa

BOOKS

THE MASTER-SERVANT DOCTRINE: HOW OLD LEGAL RULES HAUNT THE MODERN WORKPLACE (The University of California Press 2025).

EMPLOYMENT DISCRIMINATION AND EMPLOYMENT LAW (5th Ed. 2016) (with Samuel Estreicher & Michael Harper).

REAL COLLEGE: THE ESSENTIAL GUIDE TO STUDENT LIFE, Penguin, 2004 (with Douglas Stone).

EDITED VOLUMES

ARBITRATION AND MEDIATION OF EMPLOYMENT AND CONSUMER DISPUTES: PROCEEDINGS OF N.Y.U. 53RD ANNUAL CONFERENCE ON LABOR, Carolina Academic Press (2018) (with Samuel Estreicher).

BOOK CHAPTERS

The Needs of Civil Litigants, Equalizing Justice: Harnessing AI for Litigants Without Lawyers (with Charlotte Alexander) (L. Karl Branting & Mia Bonardi, eds. 2026).

Commentary on Bargaining in the Shadow of the Law, DISCUSSIONS IN DISPUTE RESOLUTION: THE FORMATIVE ARTICLES (Hinshaw, Schneider and Cole, eds. 2021).

Paid Leave under the Families First Coronavirus Response Act, WORK LAW UNDER COVID-19 (Pandya and Hirsch Eds. 2020).

Key Elements in Adverse Drug Reactions Safety Signals: Application of Legal Strategies, CANCER POLICY: PHARMACEUTICAL SAFETY 47 (June McKoy, Dennis West eds. 2019) (with Brian Chen & John Restaino).

Employee Classification, CAMBRIDGE HANDBOOK ON REGULATING THE SHARING ECONOMY (Ed. Nestor Davidson, Michele Finck, & John Infranca eds. 2018) [SSRN].

Compliance and Whistleblowers, ABA COMPLIANCE OFFICER'S DESKBOOK (Eds. Andrew Boutros, Markus Funk, & James O'Reilly eds., 2017).

ARTICLES

Misjudging a Reasonable Jury: Evidence that Courts Dismiss Meritorious Harassment Claims (with Jamillah Williams) (forthcoming, 2025) [SSRN].

Mind the Gap(s): Mitigating Harassment in a Post #MeToo Workplace, 98 S. CAL. L. REV. (forthcoming, 2025) (with Jamillah Williams & Anu Ramdin) [SSRN].

Does Lawyering Matter? Predicting Judicial Decisions from Legal Briefs, and What that Means for Access to Justice (with Charlotte Alexander, Karl Branting, Paul Morawski, Carlos Balhana, Craig Pfeifer, and Sam Bayer), 100 Tex. L. Rev. 1157 (2022) [SSRN].

Enslaved Agents: Business Transactions Negotiated by Slaves in the Antebellum South, 63 Arizona Law Review 923 (2021) [SSRN].

Does Attorney Advertising Stimulate Adverse Event Reporting? (with Brian Chen) 74:4 FOOD & DRUG LAW J. 501 (2020) (peer reviewed) [Open access].

Opportunity Discrimination: A Hidden Liability that Employers Can Readily Fix, 23 EMPL.RTS. & EMPL.POLY J. 165 (2019) (peer reviewed).

Drug Injury Advertising (with Jesse King), 18 YALE J. OF HEALTH POL'Y, L. & ETHICS 114 (2019) (peer reviewed) [SSRN].

 Quoted by the United States Court of Appeals, Fourth Circuit, in <u>Recht v.</u> <u>Morrisey</u>, 32 F.4th 398, 411 (4th Cir. 2022).

Harassment Trainings: A Content Analysis, 39 Berkeley J. Lab & Emp. L. 481 (2018) [SSRN].

The Legal Implications of the MeToo Movement 103 Minn. L. Rev. 228 (2018) [SSRN].

- Cited by the Missouri Supreme Court in <u>State Ex. Rel. Halsey v. Phillips</u>, 576 S.W.3d 177 (Mo. 2019).
- Cited by the New Jersey Appellate Division in <u>Savage v. TP of Neptune</u>, 276
 A.3d 685 (N.J.A.D. 2002).

How Employers Profit from Digital Wage Theft under the FLSA, 55(2) Am. Bus. L. J. 315 (2018) (peer reviewed) [ABLJ].

How Concepcion and Italian Colors Affected Terms of Service Contracts in the Gig Economy (with Bridget Schaaff), 70 RUTGERS L. REV. 101 (2018) (Symposium) [SSRN]

Does Attorney Advertising Influence Patient Perceptions of Pelvic Mesh? (with Jesse King, Vincent Lucente, Sonia Ephraim, Miles Murphy and Eileen Taff), 111 UROLOGY 65 (2018) (peer reviewed) [Urology].

Author Reply (with Jesse King, Vincent Lucente, Sonia Ephraim, Miles Murphy and Eileen Taff), 111 UROLOGY 70 (2018) [Urology].

The Hacking of Employment Law (with Charlotte Alexander), 82 MISSOURI L. REV. 973 (2017) [SSRN].

When Timekeeping Software Undermines Compliance (with Charlotte Alexander & Zev Eigen), 19 YALE J.L. & TECH 1 (2017). [SSRN]

- Quoted in by the California Supreme Court (concurring opinion), in <u>Troester v. Starbucks Corp.</u> (2018)
- Quoted by the Washington Court of Appeals, in <u>Cox v. the Kroger Co. & Fred Meyer Stores Inc.</u> (2018).

Using Contract Terms to Detect Underlying Litigation Risk: An Initial Proof of Concept, 20 Lewis & Clark L. Rev. 533 (2016) (Symposium). [SSRN]

Association of Attorney Advertising and FDA Action with Prescription Claims: A Time Series Segmented Regression Analysis, 38 DRUG SAFETY 1169 (2015) (with Brian K. Chen) (peer reviewed) DOI:10.1007/s40264-015-0340-6

Medical Advice from Lawyers: An Empirical Analysis of Mass Tort Advertising, 41 Am. J. L. & MED. 7 (2015). [SSRN]

Child Abuse as an Employment Dispute, 17 QUINNIPIAC HEALTH L. J. 139 (2014) [SSRN]

UTSA Preemption and the Public Domain: How Courts Have Overlooked Patent Preemption of State Law Claims Alleging Employee Wrongdoing, 65 RUTGERS L. REV. 1 (2013) (with Charles Tait Graves). [SSRN]

• Cited by the Delaware Superior Court, in <u>Atlantic Medical Spec. LLC v.</u> <u>Gastroenterology Assoc. PA</u> (2017).

Robbing a Barren Vault: The Implications of Dukes v. Wal-Mart for Cases Challenging Subjective Employment Practices, 29 Hofstra Lab. & Emp. L.J. 2 (2012) [SSRN]

- Quoted by the United States Court of Appeals, Fourth Circuit, in <u>Scott v. Family Dollar Stores, Inc.</u>, 733 F.3d 105 (4th Cir. 2013).
- Cited by the United States Court of Appeals, Fourth Circuit, in <u>Brown v. Nucor Corp.</u>, 785 F.3d 895 (4th Cir. 2015).
- Cited by the Iowa Supreme Court in Pippen v. State of Iowa, 854 N.W.2d 1 (2014)

The Promise of Compelled Whistleblowing: What the Corporate Governance Provisions of Sarbanes Oxley Mean for Employment Law, 11 EMPL.RTS. & EMPL.POL'Y J. 1 (2007) (peer reviewed). [SSRN]

Dealing with Conflict in a Psychiatric Setting, 10 Harv. Rev. of Psychiatry 1 (2002) (with Daniel L. Shapiro) (peer reviewed) [Taylor & Francis].

The Effect of Information Asymmetries on Bidder Behavior: An Empirical Analysis of Heavy Equipment Auctions (2006). [SSRN]

CONFERENCE VOLUMES

Advertising, Solicitation and Public Statements in the Digital Age (with Renee Jiang, Emily Litzinger, Sari Montgomery, and Mark Risk), 18th Annual ABA Section of Labor and Employment Law Conference (2024) (conference volume).

The Role of Technology in Wage Theft and Worker Surveillance (with Georgia Zacest), Congress Annals, 12th Regional American Congress of Law (2022) (conference volume).

Lex Rosetta: transfer of predictive models across languages, jurisdictions, and legal domains, Proceedings of the Eighteenth International Conference on Artificial Intelligence and Law (2021) (led by Jaromir Savelka & Hannes Westermann).

Predictive Features of Persuasive Legal Texts, Proceedings of the 2020 Workshop on Automated Semantic Analysis of Information in Legal Text (2020) (with Karl Branting, Charlotte Alexander, Sam Bayer, Paul Morawski, Carlos Balhana, Craig Pfeifer).

The American System for Regulating the Workplace (with Benjamin Pincus), 5 SHINSHU ECON. AND LAW REV. 141 (2018) (conference volume).

WORKS IN PROGRESS

Legislative Approaches to Social Change During #MeToo (with Jamillah Williams and Anu Ramdin) (under peer review)

Measuring the Efficacy of Harassment Training Programs: The Collective Accountability in the Workplace Change Scale (to be submitted for peer review) (with Jamillah Williams).

The Needs of Civil Litigants (with Charlotte Alexander), book chapter for volume on artificial intelligence (Branting, Ed.).

TESTIMONY

Testimony in support of Oregon SB

Invited witness, <u>A Reconvening of the Select Task Force on the Study of Harassment in the Workplace</u>, Equal Employment Opportunity Commission, June 11, 2018.

Invited witness, <u>Examining Ethical Responsibilities Regarding Attorney Advertising</u>, House of Representatives Judiciary Committee, Subcommittee on the Constitution and Civil Justice, June 23, 2017.

GRANTS & AWARDS

Hollis Teaching Award, University of Oregon School of Law, 2023

Fund for Faculty Excellence Award, University of Oregon, 2019-2020.

Michael J. Zimmer Memorial Award for a Rising Scholar, 13th Annual Colloquium on Scholarship in Employment & Labor Law, 2018.

Going the Extra Mile Service Award, University of Oregon School of Law, Spring 2016.

Faculty Research Award, University of Oregon Office of Research, Innovation and Graduate Education, Spring 2014.

Donald Walker-Norman Wiener Research Award, Summer 2014.

PUBLIC ENGAGEMENT AND MEDIA INTERVIEWS

<u>Articles for The Conversation</u> republished in the Washington Post, The New Republic, The LA Times, the Chicago Tribune, Salon, Quartz, Fast Company, Newsweek, Time, The Daily Mail, The Huffington Post, PBS, The Daily Beast, SFGate, Business Insider, Houston Chronicle, and others.

Quoted in the New York Times, Wall Street Journal, Vox, Mother Jones, Time Magazine, PBS Newshour (online), CNN Money, Wired, Consumer Report, Bloomberg Law, Wired, the Christian Science Monitor, and other media outlets.

Radio Interviews: BBC, NPR (Weekend edition, Marketplace, On Point, Planet Money's

The Indicator, 1A), Canadian Broadcasting Corporation, Australian Public Broadcasting, Sirius Satellite Radio (National Post Radio, Nomiki Konst Show, Matt Townsend Show, Top of Mind with Julie Rose), Oregon Public Radio.

Video appearances: Univision (English language), CTV News (Canada), Wall Street Journal video, NBC Left Field.

10 Ways to Mitigate Bis in Your Company's Decision Making, <u>Harvard Business Review</u> (2019).

Adapting to the New Risk Landscape, Harvard Business Review (2018).

Why Matt Lauer's Mega-Contract Couldn't Save Him, Fortune, Nov. 30, 2017.

Amicus Curiae Brief of Scholars and Practitioners of Arbitration in Support of Petition for Writ of Certiorari to the United States Supreme Court, Bakoss v. Lloyd's of London (2013) (No. 12-1429) (lead author, filed July 11, 2013).

Spending Scarce Litigation Prevention Dollars; Should You Bother with an Adverse Impact Analysis? ACC Docket (April 2013) (with Lisa Gray).

The Sarbanes-Oxley Act: Current Issues in Whistleblower Enforcement, ALI-ABA Course of Study – Litigating Employment Discrimination and Employment Related Claims and Defense in Federal and State Courts, March 5-7, 2009 (with Fred Alvarez, Jeanna Steele and Michael Nader).

WORKSHOPS, PRESENTATIONS AND SYMPOSIA

"American Legal Trends in Protecting Independent Contractors," International Society for Labour and Social Security Law, Academia Brasileira de Direito do Trabalho, (virtual), (April 11, 2025).

"Advertising, Solicitation, and Public Statements in the Digital Age," American Bar Association, 18th ABA Section of Labor and Employment Law Conference, New York, NY (Nov. 16, 2024).

"Severe or Pervasive: Evidence that Courts Dismiss Harassment Cases that Juries Would Find Meritorious," Annual Colloquium on Labor and Employment Law, San Diego, CA (October 2024).

"Introduction to American Employment Law" Symposium on Social Rights, Technology Changes, and Legal Regulation, University of Sao Paulo, Sao Paulo Brazil (April 2024) (virtual).

"Title VII's Concessions to Employer Governance," Annual Colloquium on Labor and Employment Law, Minneapolis, MN (October 2023).

"Religious Accommodation after Groff v. DeJoy," Oregon State Bar, Annual Labor and Employment Law Conference, Lincoln City, OR (October, 2023).

"How to Design, Choose, and Evaluate Harassment Training Programs," Oregon Chapter Labor and Employee Relations Association (virtual) (May 17, 2023).

"Enslaved Agents: Transactions Negotiated by Slaves in the Antebellum South," Seminar on Agency and Fiduciaries, New York University (March 21, 2023).

"Enslaved Agents: Transactions Negotiated by Slaves in the Antebellum South," Business Organizations course, Penn State Dickinson Law (virtual) (Sept. 20, 2022).

"The Role of Technology in Wage Theft & Worker Surveillance," Magistral Lecture, 12th Regional American Congress of Law, Brasilia, Brazil (virtual) (Sept. 16, 2022).

Negotiation training for criminal defense lawyers, International Bridges to Justice, JusticeMakers/African Access to Justice Fellows (online) (July 28, 2022).

Negotiation training, University of Oregon Law Summer M&A Bootcamp (online) (June 27, 2022).

Negotiation training, University of Oregon Summer Sports Institute (online) (July 13, 2022).

"Drug injury advertising" Marketing PhD Professional Seminar, Lundquist College of Business (April 22, 2022).

"Building a culture of trust around workplace harassment" The Purple Campaign Policy Design Workshop (online) (April 11, 2022).

"Ending Harassment and Promoting Workplace Dignity: An Empirically Informed Approach," 2022 Conference on New Developments in Workplace Sexual Harassment, Berkeley Law School (Jan. 28, 2022).

"Future Directions and Considerations for the Prescription Drug Promotion Research Agenda," Duke Margolis Center for Health Policy, Virtual Public Workshop (Nov. 19, 2021).

"Preparing for Mediation: A Guide for Lawyers," Mediation Tools in the Distressed Business, Instituto Recupera Brasil & Chartered Institute of Arbitrators (Sept. 15, 2021).

"The Master Servant Doctrine in Modern Employment Law" Law and Society Association, 2021 Annual Meeting (May 28, 2021).

"Does Lawyering Matter? Predicting Judicial Decisions from Legal Briefs," CODEX GROUP MEETING, Stanford Law School (February 4, 2021).

"Software-based Wage Theft," Employment Law course (Alan Hyde), Rutgers University Law School (February 4, 2021)

"Harassment education programs: An empirically informed approach" (with Jamillah Williams), 2021 Sexual Harassment in Education Conference, Berkeley Law (January 29, 2021).

"Predictive Features of Persuasive Legal Texts" (with Karl Branting, Charlotte Alexander, Paul Morawski, Carlos Balhana, Craig Pfeifer, Sam Bayer), Fourth Workshop on Automated Semantic Analysis of Information in Legal Text (2020) (Conference volume).

"Reckoning with the Master Servant Doctrine in American Employment Law," Colloquium

- on Labor & Employment Law, University of Louisville School of Law (October 9, 2020).
- "Reckoning with the Master Servant Doctrine in American Employment Law," Law Faculty Colloquium, University of Oregon School of Law (October 22, 2020)
- "The History of the Master Servant Doctrine in American Employment Law," Faculty Colloquium, Marquette University School of Law, Milwaukee, WI (March 3, 2020).
- "The Master Servant Doctrine in American Employment Law," History Department Worksin-Progress Colloquium, University of Oregon, Eugene, OR (January 21, 2020).
- Workshop Series on Alternative Dispute Resolution in the United States, University of Sao Paulo Faculty of Law, Sao Paulo, Brazil (June 3 7, 2019).
- "ADR and its Integration in the Court System," National Council of Justice, Sao Paulo, Brazil (May 31, 2019).
- "Mentoring and Being Mentored in the Era of #MeToo" American Psychology-Law Society Annual Conference, Portland OR (March 15, 2019).
- "#MeToo and the Changing Workplace Culture," 2018 OSB Labor & Employment Section Annual Conference, Portland OR (October 19, 2018).
- "The Legal Implications of the MeToo Movement," 13th Colloquium on Labor & Employment Law, Columbia, South Carolina (September 28, 2018).
- "Supreme Court Preview," American Constitution Society, Portland OR (September 21, 2018).
- "Employment Policies in the MeToo Era," NW EEO Workshop, Portland OR (September 21, 2018).
- "No Room for Sexual Harassment," Public Employment Relations Conference, Salem, OR (May 30, 2018).
- "Toward Integrating ADR Teaching, Writing, Theory, and Practice," ABA Conference on Dispute Resolution, Washington, DC (April 7, 2018).
- "The American System for Resolving Employment Disputes," Brazil-Japan Litigation and Society Seminar, Shinshu University, Matsumoto, Japan (January 10, 2018).
- "The Problem with Harassment Trainings" Colloquium on Current Scholarship in Labor & Employment Law, Texas A&M Law School, Dallas, TX (September 15, 2017).
- Panel on Negotiation Pedagogy, ABA Conference on Dispute Resolution, San Francisco, CA (April 22, 2017).
- "When Timekeeping Software Facilitates Cheating: A Behavioral Compliance Approach" Colloquium on Current Scholarship in Labor & Employment Law, Seattle WA (Sept 23, 2016).
- "Do Lawyers Disclose Internal Risk Assessments Through Contract Terms?" International Legal Ethics Conference, Fordham Law School, New York, NY (July 14, 2016).

"Drug Injury Advertising and Medical Decisions," University of Oregon Law School Lectures & Awards Presentations, Eugene OR (March 31, 2016).

"Litigation Risks Revealed in Contracts: Independent Contractor Misclassification in the Sharing Economy" Oregon Law Lab, Eugene, OR (March 18, 2016).

"Negotiation Workshop for Student Leaders" Associated Students of the University of Oregon, Eugene, OR (Dec. 3, 2015).

"Employment Law Practices to Consider as Your Company Grows" Regional Accelerator & Innovation Network (RAIN) Eugene: High-Growth Employment Workshop, Eugene, OR (Nov. 9, 2015).

"Using Data Mining to Assess Litigation Risks in the Sharing Economy" Lewis & Clark Business Law Forum, Portland, OR (Sept. 11, 2015) (invited presentation).

"How to Respond to Gender Discrimination in the Workplace" Women's Center, University of Oregon (April 15, 2015).

"Making Schools and Child Care Settings Safer Through Labor and Employment Law" presented at the American Public Health Association, New Orleans, LA (November 17, 2014) (selected via blind peer review).

"Risks for Startups Using Sharing Businesses" presented at the Regional Accelerator and Innovation Network forum on Intellectual Property Law, Eugene, OR (October 29, 2014).

"An Empirical Study of Harassment Training Practices" presented at the 9th Annual Colloquium on Current Scholarship in Labor & Employment Law, Boulder, CO (September 12-13, 2014).

"Lawyers Broadcasting Medical Advice: An Empirical Analysis of Mass Tort Advertising" presented at the International Legal Ethics Conference, London, U.K. (July 11, 2014).

"The Sharing Economy: Hidden Risks Revealed in Legalese" presented at Plugged in Portland, Portland, OR (June 20, 2014).

"An Employment Law Approach to Child Abuse in Schools and Daycares" presented at the Cardozo School of Law ADR Works in Progress Conference, New York, NY (November 7-9, 2013).

"Gatekeepers of Last Resort: The Role of Employers in Mitigating Child Abuse" presented at the 2013 Seton Hall Law Employment & Labor Law Forum, Newark, NJ (October 11, 2013) (selected via competitive process).

"Gatekeepers of Last Resort: The Role of Employers in Mitigating Child Abuse" presented at the 8th Annual Colloquium on Current Scholarship in Labor and Employment Law, Las Vegas, NV (September 27-28, 2013).

"Robbing a Barren Vault: The Implications of Dukes v. Wal-Mart for Cases Challenging Subjective Employment Practices" presented at the 2012 Conference on Empirical Legal Studies, Stanford Law School, Palo Alto, CA (November 8-9, 2012) (selected via peer review from among 356 submissions; one of only three employment law articles presented at the conference).

"UTSA Preemption and the Public Domain" presented at the 2012 Intellectual Property Scholars Conference, Stanford Law School, Palo Alto, CA (August 9-10, 2012) (selected via a competitive process).

"Information Asymmetries in Heavy Equipment Auctions" presented to Deal Design and Implementation Course, Harvard Law School, Cambridge, MA, February 2006 (invited presentation).

"Information Asymmetries in Heavy Equipment Auctions" presented to Hewlett Fellows, Harvard Law School, Cambridge, MA, Spring 2005.

ACADEMIC AND EDITORIAL SERVICE

Worklaw Section Editor, Jotwell, https://worklaw.jotwell.com/, 2022 – present.

AMERICAN ASSOCIATION OF LAW SCHOOLS

Section on Litigation, Chair (2023-2024); Chair-Elect (2022); Executive Committee (2021)

Section on Employment Discrimination Executive Committee (2023).

UNIVERSITY OF OREGON

Member, Faculty Research Award Committee, Fall 2020 – Spring 2021. Member, Faculty Research Award Committee, Fall 2014- Spring 2016.

Grievance Counselor, Office of the Provost, 2014.

UNIVERSITY OF OREGON SCHOOL OF LAW

Chair, Consumer Protection Grant Program, Spring 2020 - present

Member, Dean's Faculty Advisory Committee, Fall 2023 – present.

Chair, Outcomes & Assessments Committee, Fall 2019 – Spring 2019.

Chair, Community & Inclusion Committee, Fall 2017 - Spring 2018.

Chair, CRES Advisory Committee, Fall 2015 - Spring 2016.

Member, Outcome and Assessments Committee, Fall 2022 – Spring 2023.

Member, Personnel Committee, Fall 2020 - Spring 2022

COMMUNITY SERVICE

Oregon Chapter of the Labor and Employment Relations Association, Board Member (2022 -2023)

Eugene Symphony, Board Member (2018 - present), Music Director Search Committee (2023 - 2024).

Public Defender Services of Lane County, Board Member (2017)

BAR ADMISSION

Admitted to practice in California, New York, and Oregon.

Admitted to the Supreme Court of the United States.