



VIRGINIA LAW WEEKLY

2017, 2018, & 2019 ABA Law Student Division Best Newspaper Award-Winner

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Could America's Future Be Parliamentary?

Andrew Allard '25
Editor-in-Chief

Max Stearns is the Venable, Baetjer & Howard Professor of Law at the University of Maryland Carey School of Law. His new book, Parliamentary America: The Least Radical Means of Radically Repairing Our Broken Democracy is available for purchase online.

Last Monday, the *Journal of Law & Politics* hosted an interview with Professor Max Stearns '87 to talk about his new book, *Parliamentary America: The Least Radical Means of Radically Repairing Our Broken Democracy*. As the title suggests, Stearns' proposal is ambitious—it involves three amendments to the Constitution.

Stearns' three amendments would: (1) double the size of the House of Representative and institute a mixed-member proportional (MMP) voting system; (2) replace the Electoral College with presidential election by House party coalitions; and (3) allow the House to remove the President with a no confidence vote.

The three constitutional amendments Stearns proposes would replace the United States' present presidential system with one that looks much more like parliamentary democracy, a system of government that has been widely adopted in democracies around the globe, especially in Europe. Stearns emphasized that MMP voting—which is used in Germany—is key to breaking the “stranglehold” that the two parties currently have on American politics. “Many people haven't heard of mixed member proportionality. But it is a system that produces proportional representation

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116th Libel Show: The Best Ever?



Ryan Moore '25
Law Weekly Historian

Pictured: Libel's 3Ls take a bow.
Photo Credit: The Sandu Family

No one truly knows when this happens, but at some point during the school year, the University of Virginia sends their best and brightest law students to an elite comedy and musical performance camp. I presume the students work 14-hour days perfecting comedy writing, practicing musical composition, and learning the finer points of acting. Last Thursday, Friday, and Saturday, these insanely talented law students returned to Grounds and put on the 116th Libel Show.

The Libel Show is a UVA Law tradition, like softball or exorbitant parking fees. Legend goes that the show started as a hazing ritual, where 2Ls and 3Ls would force 1Ls to perform skits on the steps of the Main Grounds Rotunda. The 2 and 3Ls would throw rocks and shoot bottle rockets at them, which is a practice I think we should bring back.¹ The practice suffered two false starts. First, allegedly the President of UVA was hit by a stray bottle rocket. Second, and better sourced, is that in the 1900s the Libel Show lampooned a mortgage professor so hard he had the show shut down for five years. In all honesty,

¹ Let's see you dodge that, RFK Jr. Headshot!

he probably deserved it, as he failed an entire class of Mortgage Law students.

In its current iteration, the show lampoons life at the Law School through a variety of impersonations, song parodies, and skits. Despite being put on by a gaggle of law students, who ostensibly have hours of readings to do each night, the quality of performance and musicality is surprisingly high. The ultimate goal of the Libel Show is to give every law student one to three evenings of outrageous comedy. Lord knows we all need it.

Writing a review of the Libel Show is a difficult task for any reporter, let alone one as sub-par as me. Key to enjoyment of the Libel Show is knowing all the inside jokes—not just of the law but of law school itself. Try explaining *offensive non-mutual collateral estoppel*, or why Dean Dugas is a funny punchline, to someone who's brain hasn't been broken by 1L year.² I looked through past reviews of the Libel Show and honestly have a better understanding of the Rule Against Perpetuities than what the 1976 Libel Show was about.

Therefore, I have decided

² Like my wife, who kept on asking what a “fed sox” is.

to completely embrace the ephemeral nature of topical comedy and have created a list that will shoehorn in as many Libel Show in-jokes and reviews as possible.³ You'll laugh, you'll cry, you'll enjoy some BBQ that will *make you slap your dang mama*.


1. By far the biggest crowd pleaser was *Study On My Own*, a parody of *Dancing On My Own* by Robyn. If four UVA Law students were ever to drop out and form a boy band, it would be these guys. Gentlemen, there is still time.


2. I loved how the Libel Show Troika invited Robert F. Kennedy, Jr. to perform some skits. He followed in the footsteps of his father, Robert F. Kennedy, who also participated in the Libel Show during his time at UVA. Now, my editor tells me that this was not the real RFK Jr., but a talented impersonator. I remain skeptical of the official story and will await the final report from the Warren Commis-


3. Future *Law Weekly* historians will hate me, just as I hate prior *Law Weekly* reporters who do not adequately cite their sources.


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around north grounds


 Thumbs down to the processing fees charged for Libel tickets.


 Thumbs up to the upcoming Total Eclipse. ANG is a big fan of Klaus Nomi.


 Thumbs sideways to Dirty Martini Mondays. ANG wears ANG's Tuesday morning hangover like a badge of honor but is upset that others do not take advantage of the same opportunity.


 Thumbs up to Florida's new law banning children from social media. ANG is hoping they will ban the rest of us in due time.


 Thumbs down to the constantly-changing weather. Mother Nature is a capricious being, and ANG wants to be the only vengeful spirit at the Law School.

 Thumbs up to Jasmine Yoon '06. Judge Yoon, if you get tired of Virginia's Western District, there's a seat open for you on the Court of Petty Appeals. Think about it.

 Thumbs down to Justice Breyer backing Supreme Court term limits. ANG is still planning on being Chief Justice someday, and ANG damn well better get it for life.

 Thumbs sideways to James Hornsby's RFK Jr. impersonation. It was spot on, which was deeply terrifying for ANG.

 Thumbs up to the Libel Show. ANG appreciates comedy born of misery, much like ANG's own existence.

 Thumbs down to the MPRE. Why bother? ANG has practiced law (illegally) for years and never done so ethically.

Eurovision 2024 (An Extremely Detailed Explanation)

Monica Sandu '24
Production Editor
Emerita



It has become tradition at this point for me to write an article every spring giving my thoughts on the upcoming edition of the Eurovision Song Contest. As this is my last year writing such a review for the *Law Weekly*, I would like to take you all on a deep dive into that colorful, wonderful, and often absurd world that is Eurovision: a Europe-wide battle of the bands where culture and creativity come together on a global stage.

Overview

The Eurovision Song Contest began in 1956 as a “technical experiment in television broadcasting,” i.e., a live music competition.¹ Only seven countries—the Netherlands, Switzerland, Belgium, Germany, France, Luxembourg, and Italy—participated that first year. Since then, Eurovision has been broadcast every year except for 2020, with

¹ *Origins of Eurovision*, EUROVISION.TV (last accessed March 11, 2024).

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continued from page 1

and yet avoids the tragedy of many proportional representation systems that are hyper fragmented.”

Under an MMP voting system, Americans would still vote in federal elections every two years. But instead of one ballot, voters would now cast two: one for a candidate in their district—just like voting now—and one for a party. Party ballots would be assessed on a state-by-state basis to determine the proportion of seats for each party. For example, Texas’ House delegation would double from thirty-eight to seventy-six. If voters in Texas split evenly for four parties, each party would receive 25 percent of Texas’ seats in Congress, or nineteen seats each. Meanwhile, the candidates who won district votes would take one of their party’s nineteen seats until those seats are filled, with the remainder filled by party-list members.

Because a single party would be unlikely to capture the entire House of Representatives, parties would then have to form a coalition government. The resulting coalition would also appoint the President. A 60 percent supermajority of the House could then also remove the President for “maladmin-

istration.” While Stearns doesn’t supply a legalistic definition for maladministration, he noted that the supermajority requirement would prevent removal for mere policy differences because it would require members of the coalition government to also vote for removal.

Stearns acknowledged that these proposals are radical. But he suggested that they are “conservative” in the sense that they repair America’s democratic institutions through the most minimalistic reform needed. “We are past the point of band-aids,” Stearns said.

How Eurovision Works

Every year, countries whose national broadcasters are members of the European Broadcast Union (EBU)² choose a song and artist to represent them, either internally selected by the broadcaster itself or through a national song competition.

² Eurovision Song Contest, Wikipedia (last accessed March 11, 2024).

³ Plus Australia, which has participated since 2015 as special guests of the EBU. While they have yet to win, they placed second in 2016 with Dami Im’s “Sound of Silence.”

Stearns also explained his rejection of other—arguably more modest—proposals. “One of the things that gets a lot of attention is ranked-choice voting. I blame Andrew Yang for this,” Stearns said. “Ranked-choice voting does none of the things that its advocates contend.” Stearns argued that in a bimodal electorate, the elimination of candidates with the fewest votes, which characterizes the ranked-choice voting process, ultimately reallocates votes to major party candidates. “It punishes sincere voting. It doesn’t get you a centrist.”

To the extent that other problems, such as the polarized media environment, also contribute to demo-

cratic backsliding, Stearns argued that these problems will be easier to tackle under a parliamentary system. “Once we are a functioning democracy—which we are not—we can take on lots of things.”

Of course, a single amendment to the Constitution—let alone three—may be a dead end given the high bar for passage and the polarized public. Americans have amended the Constitution only twenty-seven times in 235 years, for an average of about one amendment every eight years. Excluding

the chosen act, which must be no longer than three minutes, will go on to represent their country in a three-day music festival composed of two semi-finals and the Grand Final. Participating countries, with the exception of six automatic qualifiers (the “Big Five”⁴ of the UK, Spain, Germany, Italy, and France, along with the previous year’s winner), are divided by random draw into one of the two semi-finals.

Each semi-final is a massive concert, broadcast to millions of viewers, where each act performs their song live on stage, one after another. Viewers in the participating countries vote for their favorite songs by text or online. You can only vote in the semi-final in which your country competes, and you cannot vote for your own country. Each country gives out twelve points to the song that got the most votes from viewers in that country, ten points to second place, eight

points to third place, and seven to one points for the fourth through tenth place. The top ten countries within each semi-final advance to the Grand Final, though qualifiers are announced in random order to avoid bias.

The Grand Final follows a similar format. Following a random draw placing them in either the first or second half of the show, each of the twenty-six finalists will be assigned a running order number and will perform in that order. Viewers from all participating countries, both finalists and non-finalists, may vote in the final. Additionally, each country also has a five-member professional jury who rank the songs from one to twenty-



Pictured: Sweden’s Loreen holding the Eurovision trophy
Photo Credit: Billboard

five (excluding their own country.) Each jury’s set of twelve to one points is allocated based on the aggregate ranking of the jurors. Jury points count for half of a song’s total score and are announced by a representative of each country’s jury, one country at a time. Once all the national juries deliver their votes, the hosts will announce how many public points each country got from all of the other countries’ televotes combined, in order of lowest to highest jury score. The winner of the jury vote is the last person to receive their public vote, resulting in a tense split-screen between them and the current front-runner. The country with the most points wins!

Eurovision 2024

Although Eurovision is typically hosted by the country that won the previous year, 2023 was particularly unique following Ukraine’s record-breaking victory in 2022. As the contest could not be safely held in Ukraine, the United Kingdom, who placed second, hosted the

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is proposals that require amending. No, the thing to be avoided is proposals that will not work and cannot be enacted.” Stearns suggested that, perhaps, Congress would become interested in democratic reform if a constitutional convention were initiated. “We may dislike these people—let them be the heroes of democracy.”

In short, Stearns is taking on a gargantuan task. Fixing American democracy, noble as it may be, is no easy feat. “For the same reason it is hard for a man to see where he placed his glasses, it is hard for a democracy to fix its political process.”² Vice Dean Michael Gilbert, interviewing Stearns, summed it up nicely: “I thought a natural place to start would be with the problems in American democracy. Now, the problem is, we only have one hour.”

² Note, *Pack the Union: A Proposal to Admit New States for the Purpose of Amending the Constitution to Ensure Equal Representation*, 133 Harv. L. Rev. 1049 (2020).



Pictured: Maxwell Stearns
Photo Credit: Hopkins Press

the Bill of Rights, which was quickly adopted after ratification, that average is about one amendment every fourteen years. By comparison, the global average lifespan of a constitution is just seventeen years.¹

But Stearns insists that amendments are the only viable option. “The mistake that people make is to think that the thing to be avoided

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¹ Tom Ginsburg et al., *The Lifespan of Written Constitutions*, U. Chi. L. Sch. (Oct. 15, 2009), <https://www.law.uchicago.edu/news/lifespan-written-constitutions>.

Ramping Up to a Tasty Spring

Noah Coco '26
Managing Editor



As the warmer temperatures and vexatious allergies herald another spring season, nature's early bloomers have begun gracing us with tantalizing visual spectacles, tempting us to ditch the books for a walk in the park. Look no further, for example, than the beautiful yellow and white daffodils adorning the hills along Arlington Boulevard in front of the Law School. Journey deeper into the forest, though, and you may find a curious yet aesthetically unremarkable plant amidst your feet. What this plant lacks in ostentation, it more than compensates for with delicious flavor. Indeed, it is that time of year when the seasonal ramp plant makes its noble appearance.

Ramps are an edible wild onion plant with a garlicky odor and fresh spring onion flavor. They have a very brief harvesting season—before the edible leaves yield to an unappetizing flower stalk—that typically begins in mid-March in Virginia and lasts only a few weeks.

Ramps grow in clusters of bulbs that typically produce two or three flat, smooth, light green, roughly lance-shaped leaves. They grow in forested areas with rich and moist soil, often near rivers or streams. Difficult to cultivate, ramps can instead be found punctuating the wild woodlands throughout much of the Appalachian and Great Lakes regions. Ramps are a delicious spring treat for those privileged enough to have procured some. Although they predominantly grow in the wild, you will likely still find them at farmers markets during their harvesting season. But because this window is so brief, it is easy to miss out on them altogether. Enthusiasts may prefer to obtain ramps straight from their source, opting to forage for them in the forest. Unless you are aware of a known patch of wild ramps, finding these spring delicacies is no guarantee. The reward to those who do manage to find a verdant patch of ramps carpeting the forest floor, however, is appropriately satisfying. With their garlic and onion flavor profiles, ramps can be

substituted into most dishes that require either of these grocery store staples, or any of their close relatives. Every part of the plant from leaves, to stalk, to bulb are edible, although it may be the case—especially if you forage your own ramps—that you will only have the leaves to work with. But no matter! The leaves still impart the same fresh flavor, though perhaps less pungent than the bulb.

Among the many uses of ramps, they are often added to pasta sauces or soups, sautéed with eggs or in stir fries, or preserved in pickling jars or ramp butter. One of the most common uses for fresh ramps—and one that I fully endorse—is to make ramp pesto. To date, one of the greatest dishes I ever created was a ramp chimichurri over a strip steak. Nearly unlimited permutations of recipes can incorporate ramps, and I am sure they will all be delicious.

The tragic irony of this versatile and delectable plant, however, is its ruthlessly brief growing season. As quickly as the leaves sprout from their bulbs in the early spring ground, so

too will they recede, leaving behind an elegant, leafless flower stalk supporting a flower crucial for next year's production. There is still time to get ramps for this season, but do not expect them to be around much longer.

For anyone inspired to venture out and forage their own ramps, a few disclaimers are in order. First, as a law student I feel obligated to warn against trespassing on private or otherwise restricted property. This is a hopefully obvious risk that is common to all foraging. Make sure you know where you are foraging and check that you are authorized to be present on that property.

Second, be cautious of ramp look-alikes, many of which are toxic to consume. This, too, is a risk common to all foraging, but thankfully it is relatively easy to mitigate when foraging for ramps. Two look-alikes that are particularly toxic to humans—False Hellebore and Lily of the Valley—grow in similar-looking clusters and sport similarly shaped leaves as ramps. You can distinguish these leaves from ramp plants, though,

because they have a distinct pleated pattern, compared with the flat leaf of the ramp plant. If you fail to rule out these other species by this first test, you still have a second chance: simply sniff a cut leaf. A ramp plant will have a pungent onion or garlic smell, whereas these two look-alikes—or any others, for that matter—will not. If you fail both of these sensory tests, maybe consider a different hobby that gets you out into nature—learning bird calls, perhaps.

Finally, and perhaps most importantly as far as my own interests are concerned, don't ruin ramps for the rest of us. Ramp plants are at risk of overharvesting because of their high demand, short season, and the natural fragility of the plant. Ramp seeds have a ninety-five percent mortality rate and can take seven to ten years to fully mature. Best practice for harvesting is to cut only one of the leaves from the stalk—or two if the plant has three leaves—leaving the remaining leaf and bulb in place to reproduce year-after-year.

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Tales of a Legal Subreddit

Ashanti Jones '26
Features Editor



While sitting in the audience watching the 116th rendition of the Libel Show, I noticed the toxic questionable atmosphere of the UVA Law subreddit was a recurring topic of discussion. The most striking mention of the subreddit occurred during a skit depicting confessionals of UVA Law students where the scene culminates in the priest damning the audience to hell for our contributions on the platform. As I reckoned with my newfound place in the afterlife, I wondered if the subreddit was really that bad? Sure, there has been the occasional outlandish post about SBA, the administration, or Bar Review location of the week, but the subreddit still provides a much needed resource to our community—the infamous shitposts. The constantly overlooked and underappreciated shitposts do more than just provide some much needed sarcastic humor, they provide on-the-ground updates on the current drama happenings at school. Walking out of

the auditorium,¹ I decided to celebrate one of the more “positive” aspects of our subreddit by ranking this school year's best shitposts based solely on my subjective opinion with no objective, quantitative method at all.

1. “Order of the Queef: timing and cutoff?”

The title alone places this one pretty high on my list because of the obvious reason and the potential strategy involved. This post was sandwiched in between other genuine posts about the Order of the Coif, so at first glance I didn't even notice this one was not quite like the others and the idea of someone trying some sort of comedic timing on the subreddit is both stupid and admirable.

2. “Lack of Goth Girls”

This one is only funny to me because it implies that the lack of goth girls on Grounds is a systemic, institutional issue that needs programmatic intervention, and I like the idea of affirmative action for goth girls.

¹ Totally not a last minute article idea because of brief™ week.

3. “Is it still possible to grade onto Libel after try-outs?”

I liked this one because we love a good play on current events and the implication that Libel has high standards.

4. “Anyone know how to permanently delete Venmo history?”

While there is a high chance this post was not meant to be a shitpost at all, I'd like to believe it is for my own personal enjoyment. The post provides zero context to the title, with only a simple “Thanks in advance.” There is no actual joke, but the inference was enough.

5. “Are we gonna be allowed to eat hot dogs during class on Monday since it's Labor Day?”

This could potentially also be a genuine post, which is probably the main reason I find this one funny. In the process of making this list, I have realized 1) my bar for funny is quite low, and 2) the comedians of UVA Law must be in hiding because they are not very present on the subreddit.

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Pictured: Foraged Ramps being pickled
Photo Credit: Micah LeMon, The Alley Light

LAW WEEKLY FEATURE: Court of Petty Appeals

The Court of Petty Appeals is the highest appellate jurisdiction court at UVA Law. The Court has the power to review any and all decisions, conflicts, and disputes that arise involving, either directly, indirectly, or tangentially, the Law School or its students. The Court comprises eight associate justices and one Chief Justice. Opinions shall be released periodically and only in the official court reporter: the Virginia Law Weekly. Please email a brief summary of any and all conflicts to editor@lawweekly.org

Petty Rules of Civil Procedure
Revised Ed. (2024)

A practitioner recently brought to the Court's attention that, while we have in previous decisions referenced our procedural rules, the Court has not published them in full. Because we are a wise and benevolent Court, we now publish the revised and annotated Petty Rules of Civil Procedure for the reference of all would-be petty litigants.

Rule 1. Fairness

We do what we want.
Comment: Some practitioners have asked: "Why write a comprehensive set of procedural rules if the first rule is that the Court does what it wants?" We encourage them to see Rule 1.

Rule 2. 1Ls

1Ls always lose unless it is funnier for them to win.
Comment: For the purposes of Rule 2, and the Petty Rules of Civil Procedure in General, LL.M.s are not considered part of the 1L class unless the complaint is one related to the first year at the Law School.

Rule 3. The Bit

(a) Our commitment is to the Bit. Therefore:
(1) The funniest outcome must necessarily prevail.
(2) In cases where both outcomes are equally funny, the most absurd outcome shall prevail.

Rule 4. There is one form of action—the Petty Action.

(a) A Petty Action is commenced by filing a petty complaint with the Court.
(b) Constructive Pettiness. Where the context in which a case arises is petty, that pettiness may be construed to apply to the entire case, even

(B) an even petitioner counterclaim;
(C) juicy gossip; or
(D) surprisingly accurate adherence to the Court's precedent.

Comment: These General Rules remain subject to Rule 1, as the Court may take on any case it wishes.

ferences between parties have no preclusive effect on this Court, subject to Rules 1 and 3. The Court reserves the right to rule on any case which passes its doors, even those which have ostensibly settled their differences prior to the ruling. Mootness only applies subject to Rule 3, if it is funnier for it to do so.

party;
(2) in the movant's view, a description of the funniest outcome of the case; and
(3) some light reading for our entertainment.

Rule 11. Formatting

(a) All documents must be submitted in *Curly MT* font.
(b) Don't underline things. Just stop. Use italics.
(c) If you do not use Oxford commas, we will rule against you faster than a death row inmate before Sam Alito.

(d) Fix hanging words. We will not read them.

Rule 12. Defenses and Objections

(a) Defendants are encouraged to delay filing their answer until the date that will most piss off the opposing party. But note that we might just decide to go ahead with the case without your response.
(b) Every defense to a claim for butting in

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"Why write a comprehensive set of procedural rules if the first rule is that the Court does what it wants?"

if the underlying issue would not otherwise fall into this Court's pettiness jurisdiction.

Rule 5. General Rules of Pleading

(a) Claim for Butting In. A pleading that asks the Court to settle a petty dispute must contain:
(1) an angry or insane rambling that gets across the gist of the problem;
(2) at least a couple of sentences that look something like law; and
(3) the relief sought and "pretty please" or something to that effect.

(b) Defenses.
(1) A party may file a response to a petty pleading, but we'll probably ignore it unless it includes:
(A) money;

Rule 6. Objecting to a Ruling or Order

(a) Decisions of this Court can be appealed only to God. Good luck.
(b) If someone's gonna bitch about the Court, we want to hear it directly. Submit it. We dare you.
Comment: Given this Court's previous suits against the Almighty, this Court has not yet ruled on whether Divine decisions which are not directly remanded back to the Court may be appealed.

Rule 7. Pretrial Conferences

If the parties wish to duke it out among themselves before the Court issues its opinion, we're cool with that. Fair warning—we will probably use this as an opportunity to make fun of you in the opinion.
Comment: Pretrial con-

Rule 8. Intervention

We love a good pile-on, so anyone is welcome to intervene, as long as they're angry at one of the parties. The more, the pettier.

Rule 10. Summary Judgment

(a) Parties are encouraged to move for summary judgment at any point in the litigation process. We'd like to get on with it. A motion for summary judgment must be accompanied by:
(1) insult(s) directed at the opposing


Faculty Quotes

M. Versteeg: "There's this whole belief in second chances, which...you have to have if you're German."	J. Harrison: "I'm not suggesting that you recommend your clients should die to moot their case."
D. Citron: "I'm a psycho. I'm the privacy person. I'm a lunatic."	M. Collins: "Any number of Justice Kennedy opinions could be titled <i>Tome Against the United States</i> ."
J. Law: "Oh someone left me a scrunchie. That's just what I needed. It's perfect - just my size."	B. Armacost: "Courts tend to look badly on slicing up upholstery."
A. Banzai: "12 percent of individuals admit using their phone in the shower."	F. Schauer: "[On a farm,] sex with your sheep is a not-uncommon practice."
F. Schauer: "Nobody likes cats, that's on the exam."	<i>Heard a good professor quote? Email us at editor@lawweekly.org</i>
J. Harrison: "Death, the Great Mooter, has mooted the plaintiff."	

Counsel's Counsel

The world's preeminent advice column for law students.





Virginia Law Weekly

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COPA

continued from page 4 must be shouted from the Law School rooftops (or emailed to the Court). But a party may assert the following defenses by motion:

- (1) lack of petty jurisdiction;
- (2) typo in complaint, idiot!;
- (3) really just not interested in this rn;
- (4) male living space venue;
- (5) failure to state a petty claim; and
- (6) unqualified filer (1L, resident of Massachusetts, etc.)

Comment: We arguably have personal jurisdiction over everyone. Because all humans have deliberately availed themselves of pettiness at one point or another.

Rule 13. Amended and Supplemental Pleadings

- (a) A party may amend its pleading once as a matter of course within:
 - (1) 21 days after serving it, or
 - (2) 22 days after serving, if during a leap year.
- (b) In all other cases, a party may amend its pleading only after beg-

ging on their hands and knees.

(c) On second thought, ignore all of the above. For the love of God, don't bother. Whatever you filed in the first instance, we likely barely read it.

Rule 14. Applicability of the Rules

(a) If you're rude, the Court may favor the opposing party in interpreting and applying these Rules.

(b) On the other hand, we're not above a little bribery. Note: The Chief Justice loves a good croissant.

Rule 15. Recusals

Justices are not precluded from presiding over a case that involves any conflict of interest, up to and including decisions affecting the Justices themselves.

Comment: We modeled this one on the U.S. Supreme Court, and it's been working pretty well for us.

Rule 16. Interpleader

Oh God, not this shit.
Comment: You cannot make me go back into my CivPro notes and read about this.

Rule 17. Help.

- (a) All procedure and no substance makes the Court write dull opinions.
- (b) All procedure and no substance makes the Court write dull opinions.
- (c) All procedure and no substance makes the Court write dull opinions.
- (d) All procedure and no substance makes the Court write dull opinions.

Rule 18. Justices shouldn't be assholes.

Comment: This rule is subject to the limitations of Rule 1.

Rule 19. Any rules not listed in this collection yet subsequently referenced by the Court are valid and within this Court's discretion, so long as they do not conflict with an written rule absent clear and convincing language that the Court intends to overturn a previously established rule.

Comment: The Court reserves Rule 9 for future use.

LIBEL

continued from page 1 sion.

3. George Santos.

4. Little known fact, but the Charlottesville Historical Society recently unearthed a lighthouse on the grounds of Monticello. The Libel Show was lucky enough to secure an exclusive interview with Bartholomew, the current lighthouse keeper, who is offering discounted accommodations for UVA Law students. Have your carrier pigeons on standby.

5. The only lowlight of the night came from the trumpet player on *Darden Guys*. This player, who shall remain nameless,⁴ made a mistake starting at measure 76. The notes he was supposed to play were D#, G#, G#, B, B, then a C#. Instead, after the second B note, he dropped down to an A natural. A rookie mistake, unbecoming of his level of skill and abilities, but most likely a result of the open bar.

That just about sums up the 116th Libel Show. Every year I am shocked at how

⁴ But is totally not me.



*Pictured: James Hornesby '24 as Swiper the Parking Police Officer
Photo Credit: UVA Law on X*



*Pictured: The Founding of UVA
Photo Credit: UVA Law on X*

talented my fellow law students are, and how much we accomplish in just a few group rehearsals. Special shoutout to my bandmates. Playing music with you all the last two years has been one of my most cherished experiences, and I will dearly miss you, and our 2:00am runs to Cookout.

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HOT BENCH



Darius Adel '24

Interviewed by Jordan Allen '25

Darius, welcome to the Hot Bench! As a 3L and veteran of the Law Weekly, I know our audience would love to hear about your story. First off, where are you from, and where did you go to undergrad?

Sure thing! I'm from the California Bay Area, and I went to UC Berkeley for undergrad.

What brought you to law school, and specifically UVA?

So I worked at a small ed-tech company right after college to get some practi-

cal skills. It was fun working with web apps stuff, but I always had my eye on transitioning into the legal industry. Eventually, I got a job in the legal department of this streaming company which eventually morphed into Paramount+, and it was a cool intersection between the software work I had been doing and the legal work I wanted to do. After a few months there, I found transactional work really interesting and was set on going to law school.

As for UVA, I wanted to branch out a little bit, and Charlottesville seemed like a really cute place to live for a few years. Also, Admissions put out that \$\$\$ if you know what I mean...

That's an awesome bit of unique experience! What will you be up to after graduation?

I'll be doing transactional work for tech and life science companies at a firm in New York.

As graduation approaches, do you have advice for the younger law students on how to have the best experience here?

Go to office hours. Your professor decides your grades, and they are literally setting aside time for you to ask them about the material that will be on the test. I know it may be intimidating to talk to your professor one-on-one but that time with them is so valuable.

On that same note, get out of your comfort zone. This is a time for you to grow.

What has been your favorite extracurricular outside of the Law Weekly?

Probably revitalizing NLG's legal observer program with my homie John Henry. It's been so fulfilling to help the people I admire most in this world. I think developing some type of legal aid skill is so important, especially for people going into private practice like me.

Are there any professors who you feel have been particularly impactful for you?

Definitely Kordana, RIP... just kidding. I hope he's doing well. Best Corporate Law professor in my opinion. He taught me to think through legal problems creatively.

Could you tell us about your clinic (legal aid) experience?

I did the Nonprofit Clinic. It was super nice to help out local community orgs, and the workload was much lighter than most of the other clinics.

Lighting Round!

Favorite restaurant around Charlottesville (Besides Dominos, the glorious sponsor of this paper)?

That's tough; I don't usually go out to eat. Does ice cream count as a meal? La Flor Michoacana on Cherry Ave is SSS tier.

Favorite activity/hobby when you have a few hours of free time?

I love to tend my garden. I used to be a "only grow what you can eat" dork, but now I'm trying to expand my horizons a little bit. Maybe add in a couple of pollinator friendly flowers to the mix? Hmmm.

Favorite class?

Repugnant Transactions with Professor Kraweic. I know it's a hot take, but I

love everything about that class.

Best article you have written for the Law Weekly?

That's tough. My best article was probably my stop the steal article with former President Juhi Desai '23. That one actually made me have a giggle fit while I was writing it.

Most tyrannical EIC you have seen at the Law Weekly?

Dana.

Backup career in case this whole law thing doesn't work out?

There's no backup plan. I think my calling to be a lawyer originates from a divine mandate like that of the philosopher kings of old.

What unorthodox pet would you have?

Probably a dire wolf. It's gotta be large enough that I can ride on top of it like some shaman warrior. Maybe that's actually my backup plan . . .

EUROVISION

continued from page 2
show in Liverpool, in a collaboration between the BBC and Suspilne, Ukraine's national broadcaster. At the end of the night, Sweden took home the Eurovision trophy for a historic seventh time, becoming only the second country in the Contest's history to do so, tying with Ireland for the greatest number of wins overall (though Ireland remains the only country so far to have won three times in a row.) Singer-songwriter Loreen won with her song, "Tattoo," becoming the second person (after Ireland's Johnny Logan) and first woman to win the contest twice, having also won for Sweden in 2012 with her song, "Euphoria."

Eurovision 2024 will be hosted in Malmö, Sweden! 2024 will see thirty-seven countries competing, with Romania's withdrawal due to financial difficulties and five-time winner Luxembourg making a long-awaited return after last participating in 1993.

My Ranking

1 point to France!

I always love a good French ballad, and this year is no exception. Slimane steals the show in "Mon Amour" with his incredibly powerful voice, filled with longing, vulnerability, anger, and even self-deprecation as he begs his love to return to him and to remember what they shared together.

2 points to Serbia!

Serbia's Teya Dora brings us "Ramonda," a beautiful, heart wrenching ode to finding hope even in one's darkest hour. The Ramonda is a small purple flower that grows in mountainous areas with rocky soil and is often very difficult to find.⁵ Strikingly, the Ramonda is able to revive itself with just a small amount of water even after being completely dried out. Because of this ability, it became the symbol of the Serbian people's suffering and endurance during World War I, in which Serbia lost 28 percent of its population.⁶ Calling out for her lilac Ramonda, Teya Dora's struggle throughout the song ends with a glimmer

⁵ Ruxandra Tudor, "The world is on fire, every flower too": Teya Dora seeks hope amid struggle in the "Ramonda" lyrics, Wiwibloggs, Mar. 22, 2024.

⁶ Ramonda (song), Wikipedia (last accessed Mar. 11, 2024).

of hope as a single flower blooms like a phoenix from the ashes.

3 points to Austria!

As the name would suggest, "We Will Rave" is a pure Eurodance party where Austria's Kaleen sings about curing a broken heart through raving. It's just an overall excellent EDM dance bop that I can't help but listen to on repeat!

4 points to Italy!

"La Noia" juxtaposes an energetic, Latin American-inspired dance beat with lyrics about the monotony of life and the stiflingly restrictive nature of gender norms. Comparing her life to a cumbia—a style of Colombian folk music characterized by a strong, repetitive rhythm—singer Angelina Mango nevertheless dances her "cumbia of boredom" to find reprieve, as she would rather try to escape and fail than never try at all.⁷

5 points to Belgium!

Something about this song and its composition totally captivates me. Mustii's "Before the Party's Over" is a rich, brooding piece of music that reflects on the brevity of life and the importance of living authentically while you are still able to do so. It's intensely atmospheric, nearly abstract, and has one of the most unique song structures of the year. Instead of the typical verse-chorus-verse-chorus-bridge-chorus form, the song continually builds until it reaches its musical zenith in a final explosion of desperation and determination.

6 points to Spain!

Spain's Nebulossa sings "Zorra," playing with the double meaning of the word "zorra" (either a female fox or a vulgar term for a promiscuous woman) and aims to reclaim the word as one of female empowerment. With instrumentation and vocals that call back to the Spanish pop scene of the 1980s, it's a great time all around!

7 points to the Netherlands!

Wonderfully upbeat and surprisingly heartfelt, "Europapa" is a love letter to Europe and to finding one's own identity. "Europapa is about an orphan who travels throughout Europe (and beyond) to find himself and tell his story," artist Joost

⁷ Ruxandra Tudor, "I die without dying" — Angelina Mango dances cumbia to slay boredom and gender expectations in the "La Noia" lyrics, Wiwibloggs, Mar. 16, 2024.

Klein explains. "At first, people don't recognize him, but he goes on seizing any opportunity he gets to let himself be seen. Europapa is a tribute to my father. When bringing me up, he passed to me an expansive view of the world."⁸ Behind its quirky façade and earworm refrain lies an emotional mixture of nostalgia, wanderlust, and the bittersweet feeling of accomplishing your dreams in honor of loved ones who have passed.

8 points to Norway!

"Ulveham" (meaning "wolfskin") by Gåte is a folk rock-metal combo song featuring a traditional herding call with lyrics based on a thousand-year-old Scandinavian ballad about a young maiden who is transformed into a wolf by her evil stepmother and must break the curse. Combined with the return of the Norwegian language to the contest for the first time since 2006, what's not to like?

10 points to Armenia!

Armenia's song "Jako," by French-Armenian duo Ladaniva, is everything I love and exactly what I want to hear in Eurovision: a supremely fun folk fusion that's an explosion of pure color and joy, bringing modern flair to a blend of traditional sounds. Singer Jaklin Baghdasaryan and multi-instrumentalist Louis Thomas make up the duo whose musical style is inspired by Armenian folklore, traditional Balkan music, and maloya from Réunion, to name a few.⁹ "Jako" is Jaklin's childhood nickname, and the lyrics are a call to all young girls in the world to be their "real, wild, unapologetic selves."¹⁰ Overall, Jako is a beautiful showcase of Armenian language and culture that makes you feel like getting up and dancing!

12 points to Croatia!

This song has perhaps the greatest backstory of the year. Marko Purišić (aka "Baby Lasagna") initially intended for his song "Rim Tim Tagi Dim" to be a filler track on his debut album until a friend suggested he

⁸ Ruxandra Tudor, "Europapa": Joost Klein releases his Eurovision 2024 song for the Netherlands, Wiwibloggs, Feb. 29, 2024.

⁹ Ladaniva, Wikipedia (last accessed Mar. 24, 2024).

¹⁰ Antranig Shokayan, "I will dance and you will watch": Armenia's Ladaniva sings about embracing who you are in "Jako" lyrics, Wiwibloggs, Mar. 20, 2024.

submit it to *Dora 2024*, Croatia's national selection. It failed to make the initial cut but was kept as one of four backup songs. When one of the artists withdrew the next day, Baby Lasagna was chosen to replace her. He then went on to win *Dora* with 247 public points, ten times more than second place and more than all of the other twenty-three acts combined.¹¹ Croatia skyrocketed in the betting odds, reaching first place as the most likely song to win the contest, surpassing even longtime leaderboard dominator Ukraine.

Rim Tim Tagi Dim combines techno, heavy metal, and rock to tell the story of a young man from the Croatian countryside who is leaving his village to pursue better opportunities abroad and faces extreme anxiety about leaving everything—and everyone—behind. With iconic lyrics like "Meow, cat, please, meow back" and costumes based on traditional Istrian dress, Rim Tim Tagi Dim manages to entertain while also addressing serious topics in contemporary Croatian culture—the "brain drain" of the countryside, the uncertainty of immi-

¹¹ Rim Tim Tagi Dim, Wikipedia (last accessed Mar. 13, 2024).


grants integrating into new lands and wanting to bring at least some traditions with them, and fears of young people who must choose between their home and their future.

In 1989, Yugoslavia won Eurovision for the first—and only—time, with the song "Rock Me" by the Croatian band Riva.¹² Because the entry was from Croatia, which was at the time one of eight Yugoslav federal units, the 1990 Contest was held in Zagreb. Were Croatia to win Eurovision this year, it would be their first victory as an independent country.

Eurovision 2024 will take place on Tuesday, May 7 (Semi Final 1); Thursday, May 9 (Semi Final 2); and Saturday, May 11 (Grand Final) in Malmö Arena and will be broadcast in the United States on Peacock. Let the Eurovision Song Contest 2024 begin!

¹² Riva (band), Wikipedia (last accessed Mar. 13, 2024).

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