

UNIVERSITY of PENNSYLVANIA
LAW REVIEW

Founded 1852

Formerly
AMERICAN LAW REGISTER

BOARD OF OFFICERS
VOLUME 169

Editor-in-Chief

JAMES R. THOMPSON

Managing Editor

JULIA C. BUFF

Executive Editors

BENJAMIN BROWN-HARKINS

RHOCHELLE KRAWETZ

BRIDGET LAVENDER

ANDREW I. LIEF

RYAN C. MCEVOY

ELIZABETH PELED ZINBERG

Comments Editors

MEGHAN L. DOWNEY

SAMUEL W. GIVERTZ

KELLEN MCCOY

HANNAH G. PUGH

Articles Editors

SEAN M. BENDER

JENNIFER KELLY CORCORAN

ALICIA LAI

J. JACOB MARSH

JENIFER J. NORWALK

Online Managing Editor

ALEXIS K. DESIRE

Philanthropy Editor

MARY M. FELDER

Production Editor

MOLLY E. NICHOLS

Bluebook Editor

SARAH M. BYRNE

Online Executive Editor

JUSTINE Y. DROHAN

Research Editor

EMILY A. HOOKER

Symposium Editor

MICHAEL WEINGARTNER

Alumni Editor

AMY L. WOODWARD

Senior Editors

MICHAEL K. HILYARD

ESTHER KANG

YEHUDA KATZ

ISABEL J. KIM

RACHEL BAKER MANN

MARINA MASTERTON

MARY ANN F. McNULTY

RACHEL NECKES

ERIK NICKELS

ANITA H. OH

CHRISSY H. PAK

EMILY PORTUGUESE

ANDREW ROCCO

LILA SEVENER

ANNA SHEU

LUCAS SIEGMUND

ALEXANDRA STUART-LOVELL

HOWARD J. WEISS

ANNIE WHEAT

NICK WIGGINS

ELIANA APPLEBAUM

JILL E. BARTON

KATE BASS

SARAH LEE BEST

EMILY DELIZ

MILAD EMAMIAN

CONOR D. FERRALL

ADAM GARNICK

KATHERINE GODAR

PATRICK HASSON

Associate Editors

ELLEN R. HEIMAN

EMILY R. HORWITZ

ANGELA JACOB

BETHANY LEE

SHERRY Z. LIU

ERICH MAKAROV

ZACHARY MARINO

ROBERT T. McMULLEN

SABRINA MINHAS

LILY MORAN

ANDRÉ MOTA

PETER G. H. NEAL

TEDDY OKECHUKWU

MOUSHMI PATIL

KARLI E. RAMIREZ

ERICA V. RODARTE COSTA

SETH ROSENBERG

BROOKE ROTTET

JARETT A. ROVNER

MEGAN E. RUSSO

LETICIA SALAZAR

JOHN F. SAYLOR

MATTHEW J. SEELIG

ANNA SIMONOVSKY

MICHAEL STEPHENSON

FRANCISCO J. TORRES

ANTHONY TRAN

MAHAM USMAN

MADELINE VERNIERO

APRATIM VIDYARTHI

NICHOLAS WHETSTONE

ZACHARY M. WILLIS

MICHAEL WITTMANN

DAVID WREESMAN

ANGELA T. WU

GEORGE ZINDEL IV

YEWANDE ALADE
ELEANOR ALLEN
SHAKED BARKAY
CAL BARNETT-MAYOTTE

AVA BARZEGAR
JANE E. BLACK
COURTNEY BLEDSOE
LEI S. BRUTUS

JACOB L. BURNETT
JONATHAN J. DUNN
MAGALI DUQUE
GEORGE EICHELBERGER

JOSHUA EL-BEY
ERIN FISCHER
PATRICK GAUGHAN
LUKAS GEMAR
MICHAEL GNIWISCH
JOSHUA J. HARDIN

Office Assistants

ERIN KRASKIEWICZ

MICHAEL LIN