United States Court of Appeals

For the Seventh Circuit
Chicago, Illinois 60604

Submitted March 5, 2025*
Decided March 6, 2025

Before

MICHAEL B. BRENNAN, *Circuit Judge*

CANDACE JACKSON-AKIWUMI, *Circuit Judge*

JOSHUA P. KOLAR, *Circuit Judge*

No. 23-3070

JANE DOE,
Plaintiff-Appellant,

v.

UNIVERSITY OF CHICAGO, et al.,
Defendants-Appellees.

Appeal from the United States District Court for the Northern District of Illinois, Eastern Division.

No. 22-cv-01032

John F. Kness,
Judge.

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

O R D E R

Jane Doe[1], a former student at the University of Chicago School of Law, appeals the dismissal of her wide-ranging suit against the University and various employees as barred by the statute of limitations. The district court ruled that the limitations period had expired before Doe filed suit, and that no theory of tolling could save her claims. We affirm.

Doe enrolled as a student at the University of Chicago School of Law in 2006, but her time at the law school was not as successful as she had hoped. Throughout her time in law school, she failed numerous courses. Although she graduated law school in June 2010, Doe asserts that her law school transcript is "fraudulent" because it did not include any reference to her failed courses, and her law degree is invalid because she received credit for courses that she failed. She took the New York bar exam but ended her pursuit of becoming an attorney because of her alleged invalid law degree.

In December 2021, she sued the University along with several faculty members and deans of the law school. She alleged one federal claim under the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962, and five state-law claims including violation of Illinois's Consumer Fraud and Deceptive Business Practices Act, breach of fiduciary duty, breach of contract, fraudulent concealment, and unjust enrichment.

Doe initially sued in the Southern District of New York, but the court transferred the case to the Northern District of Illinois because Doe did not allege that any of the defendants reside in New York and her claims arose primarily from her experiences while at law school in Chicago. After the transfer, the defendants moved to dismiss the complaint under Federal Rule of Civil Procedure 12(b)(6), arguing, among other things, that the suit was untimely.

The district court agreed with the defendants that the statute of limitations barred Doe's claims. Noting that the longest possible limitations period was 5 years, *see* 735 ILCS 5/13-205, the court ruled that the statute of limitations had lapsed because the clock began to run when Doe received her law degree—June 8, 2010—and she did not file her suit until December 2021. The court rejected Doe's theories for tolling the time to sue. And based on all the connections that this case had to the Northern District

[1] Because plaintiff's allegations reflect numerous details relating to her physical and mental health, the district court permitted her to proceed under the pseudonym "Jane Doe." We will do the same.

of Illinois, the court denied Doe's motion to transfer the case to the Southern District of New York.

On appeal, Doe first challenges the dismissal of her complaint based on the statute of limitations. But dismissal was correct here. Doe does not dispute that the longest possible limitations period for her claims was subject to the Illinois 5-year statute of limitations. 735 ILCS 5/13-205. Under Illinois law, Doe's claims accrued as soon as she should have discovered her injury. *Khan v. Deutsche Bank AG*, 978 N.E.2d 1020, 1028–29 (Ill. 2012). As the district court correctly noted, Doe should have known of her invalid law degree by June 2010. That is when, according to the complaint, she received a law degree despite failing multiple courses. When she sued—more than 11 years later—the limitations period had expired.

Doe insists that her claims were tolled because her professors, acting in a fiduciary capacity, fraudulently concealed the fact that the University awarded her an invalid law degree. *See* 735 ILCS 5/13-215 (statute of limitations on claims that are fraudulently concealed does not expire until five years after the claim is discovered). Even if we assumed that a fiduciary relationship existed, Doe's tolling argument fails because she does not allege any causal connection between her professors' silence and her failure to timely discover her claims. *See Guarantee Tr. Life Ins. Co. v. Kribbs*, 68 N.E.3d 1046, 1057 (Ill. App. Ct. 2016) (no fraudulent concealment where plaintiff failed to attribute its failure to discover its claims to fiduciary's silence).

Doe also invokes equitable tolling, pointing to mental-health issues that she says have rendered her legally disabled. *See* 5 ILCS 5/13-211. Illinois law defines a "legal disability" as one that prevents an individual from being able to manage her person or estate. 5 ILCS 70/1.06; *see Parks v. Kownacki*, 737 N.E.2d 287, 295 (Ill. 2000). Doe contends that her impaired cognition and declining mental health prevented her from filing suit, but she did not allege that she had any difficulty managing her person or her estate.

Finally, Doe challenges the district court's denial of her request to transfer venue to the Southern District of New York. *See* 28 U.S.C. § 1404(b). But the district court appropriately exercised its discretion to deny the motion, given that Doe's claims primarily arose from events that occurred in the Northern District of Illinois—a court that was available, adequate, and more convenient for witnesses. *Id.* § 1404(a); *see Rsch. Automation, Inc. v. Schrader-Bridgeport Int'l, Inc.*, 626 F.3d 973, 979 (7th Cir. 2010).

We have considered Doe's remaining arguments; none merits further discussion.

AFFIRMED