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## OSU, Prof Cleared In Harassment Case Revived By 6th Circ.

## By Cara Salvatore

Law360 (September 19, 2025, 10:15 PM EDT) -- A federal jury on Friday rejected a former Ohio State University graduate student's harassment claims against her doctoral adviser and the school, a year after the Sixth Circuit revived the case.

The jury ruled against mechanical and aerospace engineering doctoral candidate Meng Huang on her Section 1983 claim under the 14th Amendment right to bodily integrity. Huang claimed that Giorgio Rizzoni, her Ph.D. adviser, sabotaged her doctoral candidacy exam after she did not accept his alleged sexual advances.

The jury had to answer only one question, whether it found in Huang's favor or Rizzoni's. It found for Rizzoni.

The university originally won summary judgment, and Rizzoni went to trial and was cleared. However, in 2024, a split Sixth Circuit sent the case back to an earlier stage and revived the university claims, ruling that key evidence had been impermissibly blocked from trial.

The appeals court found that the lower court made key missteps that prejudiced the former student.

Huang claims Rizzoni subjected her to unwanted touching over the three-and-a-half years she spent as his advisee.

When she repeatedly resisted, Huang claimed Rizzoni rushed her Ph.D. candidacy exam, manipulated the examination committee to fail her and denied her the opportunity afforded to other candidates to retake it.

Rizzoni claimed he was a victim of Huang's allegations of sexual harassment brought on after he criticized her poor performance in her program.

The Sixth Circuit panel said Huang adequately showed she may have been an "employee" of OSU and protected under Title VII, even though she was also a student. The lower court mistakenly held that the two roles are exclusive, but student's academic and employment work can overlap, the panel said.

Additionally, when Huang physically resisted Rizzoni's alleged advances by pushing him away, this was enough to show she opposed his actions without her having to vocalize her stance, the majority said.

The lower court was also wrong to bar evidence it considered "irrelevant" showing that Rizzoni may have threatened Huang after she did not accept his advances, the panel said.

Huang pointed to an email Rizzoni had sent in which he told Huang he was not "getting [his] money's worth" out of her. The panel also said she was improperly blocked from presenting evidence of her "impeccable" academic credentials and "stellar" Ph.D. program performance.

The harassment in question allegedly occurred while Huang and Rizzoni were working together on a research project sponsored by Ford Motor Co.

Huang claimed the sexual harassment began during her first meeting with Rizzoni in September 2014 and continued until December 2017 when she reported his behavior and was removed from the project.

Representatives of the parties were not immediately available for comment.

Huang is represented by Bruce Fox and Andrew Horowitz of Obermayer Rebmann Maxwell & Hippel LLP and by Hugh McKeegan of Del Sole Cavanaugh Stroyd.

OSU and Rizzoni are represented by Jeffrey Gerish and Christina Corl of Plunkett Cooney.

The case is Huang v. OSU et al., case number 2:19-cv-01976, in the U.S. District Court for the Southern District of Ohio.

--Editing by Nick Petruncio.

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