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CIRCUIT COURT OF
DeKALB COUNTY, ALABAMA
TODD GREESON, CLERK

IN THE CIRCUIT COURT OF DEKALB COUNTY, ALABAMA

PRUITT JEREMY, Plaintiff,	)	
V.	)	Case No.: CV-2025-900060.00
NATIONAL COLLEGIATE ATHLETIC ASSOCIATION, Defendant.	)	

ORDER

This matter is currently before the Court on the Plaintiff's motion for preliminary injunction. The Plaintiff, Jeremy Pruitt ("Pruitt"), seeks injunctive relief, requesting this Court to enjoin the Defendant, National Collegiate Athletic Association ("NCAA"), from enforcing its "Show Cause Order" against Pruitt.

Pruitt is a football coach, having coached at the University of Tennessee, the University of Alabama, Florida State University, University of Georgia, the New York Jets, and local high schools within Alabama. The NCAA is an unincorporated organization of approximately 1,200 members, including almost all public and private universities conducting major athletic programs within the United States. The NCAA is tasked with the adoption and enforcement of a variety of issues, including academic standards for eligibility, admissions, and the recruiting of student athletes.

In December 2017, Pruitt was hired as the head coach at the University of Tennessee ("UT"). In September 2020, Pruitt and UT executed a contract extension. The NCAA alleges that on November 13, 2020, an athletics department staff member informed the Office of Chancellor that the staff member overheard members of the UT football program talking about certain members "getting paid." *See* July 14, 2023, Public Infractions Decision ("PID"). A few

days later, UT engaged outside counsel to investigate the reported information. On January 18, 2021, UT fired Pruitt "for cause" due to the allegations against Pruitt and/or his staff of violating the NCAA's rules against impermissible benefits to players and recruits. On July 14, 2023, the NCAA released its Public Infractions Decision ("PID") concerning Pruitt and UT. The infractions decision was released by the NCAA Division I Committee on Infractions ("COI"). The COI is an independent administrative body of the NCAA comprised of individuals from the Division I membership and the public. *See* July 14, 2023, PID. As a result of its investigation, the COI prescribed a six-year show cause order against Pruitt, set to expire on July 13, 2029. Pruitt brought this lawsuit on March 26, 2025, for negligence, wantonness, tortious interference with existing and prospective business relationships, conspiracy, and bad faith. Pruitt seeks monetary damages and injunctive relief.

For this Court to grant a preliminary injunction, Pruitt must show all the following:

> (1) that without the injunction the plaintiff would suffer immediate and irreparable injury; (2) that the plaintiff has no adequate remedy at law; (3) that the plaintiff has at least a reasonable chance of success on the ultimate merits of his case; and (4) that the hardship imposed on the defendant by the injunction would not unreasonably outweigh the benefit accruing to the plaintiff.

Stephens v. Colley, 160 So.3d 278, 282 (Ala.2014) *quoting Perley ex rel. Tapscan, Inc. v. Tapscan, Inc.*, 646 So.2d 585 (Ala.1994). For the reasons stated herein, the Plaintiff's request for a preliminary injunction is due to be granted.

Irreparable Injury –

Alabama Courts have defined "irreparable injury" as an "injury that is not redressable in

a court of law through an award of money damages." *Triple J Cattle, Inc. v. Chambers*, 551 So.2d 280 (Ala.1989); *Perley for Benefit of Tapscan, Inc.* at 587. The risk of irreparable injury is the primary reason for issuing an injunction. *Triple J Cattle, Inc.* at 282. Pruitt argues that an injunction is justified to preserve his ability to pursue coaching opportunities pending a final resolution of this case. This Court agrees. The Plaintiff correctly points to a significant number of courts to have held that the fleeting nature of college athletics justifies injunctive relief to allow the athlete or coach the ability to continue participation in their sport. *See Biediger v. Quinnipiac University*, 616 F.Supp.2d 277 (U.S. District Court, Conn.2009). This is certainly true in today's collegiate athletic landscape. Some industry experts expect a record number of coaching changes in college football for the 2025 season. *See* Chris Hummer, John Talty and Richard Johnson, Meet the Candidates – 88 of them: The Only List You Need for College Football's Wildest Coaching Carousel, CBS SPORTS, November 6, 2025, www.cbssports.com/college-football/news/college-football-coaching-carousel-2025-list-of-all-candidates-lane-kiffin-even-lincoln-riley/; *See also* Mitchell Leff, Ranking College Football's 10 Open Coaching Jobs, New York Times, December 2, 2025, www.nytimes.com/athletic/6662286/2025/12/02/college-football-open-coachin-jobs-rankings/.

As the *Biediger* court noted, college athletes – and by comparison, college coaches – "develop skill, self-confidence, learn team cohesion and a sense of accomplishment, increase their physical and mental well-being, and develop a lifelong healthy attitude[.]" *Biediger* at 291. Pruitt, and most likely every other Division I head coach, has undoubtedly devoted a significant portion of his life working to become a successful collegiate coach, spending numerous hours perfecting his trade. *See* AlaCourt Doc. 79-83, Confidential Exhibits 1, 2, 3, 4, 5. The continued interruption of his ability to do that would irreparably prevent him from

competing at the level of coaching that he found himself at for many years prior to the show cause order. *Pavia v. National Collegiate Athletic Association*, 760 F.Supp.3d 527 (M.D. Tenn.2024) ("This Court has no trouble concluding, as many other courts have, that the denial of the ability to play sports is irreparable harm."); *See also* Confidential Exh. 5, AlaCourt Doc. 83 ("Yeah, I wanted to bring Jeremy back on the staff as soon as I could … I was hopeful that when his circumstance got resolved, I would be able to hire him, and could not."). Pruitt has demonstrated that, but for the show cause order, he would have the opportunity to continue coaching in collegiate sports. He has demonstrated that the continued interruption of those opportunities is an immediate, irreparable harm. Thus, he has met the first element to justify injunctive relief.

No Adequate Remedy at Law –

For many of the same reasons previously stated herein, the Court finds that there is no adequate remedy at law, absent injunctive relief.

Monetary damages would not restore Pruitt's ability to coach – to develop skills, spend time with players, to be intricately involved in the ever-changing athletic landscape – pending a final resolution in this matter. It would be difficult, if not impossible, to calculate exact damages. This is because available positions for potential coaches, and the contract amount for each position, vary between schools, geographic locations, and other contributing factors. Further, money damages alone would not adequately remedy the loss of professional reputation and opportunities, as alleged by the Plaintiff. *Pavia* at 544 ("In addition, although the value of missed NIL opportunities could potentially be quantified, the lost opportunity to play NCAA Division I football for four seasons results in loss opportunity for exposure and building his 'personal brand.'"). Likewise, even if a monetary amount could be calculated for Pruitt's missed

coaching contracts, his exposure and "personal brand" cannot be adequately reduced to a monetary judgment.

As such, the Court finds that Pruitt has met the second element to justify injunctive relief.

Reasonable Chance of Success on the Merits –

Based on the totality of the evidence before the Court, there exists a reasonable probability that Pruitt could be successful on the merits of his case.

One of Pruitt's chief complaints is that the COI never sought the truth in its investigation and subsequent hearing. Pruitt alleges that the COI accepted UT's version of the events, disallowed Pruitt the opportunity to adequately present and/or defend his case, and levied disproportionate penalties against Pruitt. After reviewing the PID in its entirety, the Court finds that a jury could reasonably find that Pruitt was denied a fair and impartial opportunity to present and defend his position to the COI.

First, several witnesses that the COI relied heavily upon in their decision against Pruitt gave conflicting statements. Almost every conflicting statement – if not all – were resolved by the COI *against* Pruitt. Conversely, when conflicting statements were favorable to Pruitt's position, the COI either, again, resolved them against Pruitt, or they gave little consideration, if any, to the evidence.

One witness, Prospect 1's mother, gave serious conflicting statements between her initial interview and a written proffer later prepared by her lawyer. In response to the changing statements, Pruitt raised a potential conflict to the COI regarding the fact that, at the time the enforcement staff was seeking to interview Prospect 1 and his mother, Prospect 1 was awaiting a decision from UT regarding a requested grade change. This grade change, ultimately granted by

UT, was required for Prospect 1 to remain academically eligible to compete at his new institution. Surprisingly, counsel for Prospect 1 even sent the enforcement staff a correspondence that admitted Prospect 1 and his mother were awaiting a decision from UT on the grade-changing issues before they were willing to be interviewed. The COI even admits that this correspondence demanded a decision on the grade-changing issue first. The COI ignored this clear conflict by simply stating that there was no documentation in the record regarding the ultimate reason for the grade change. Again, the COI resolved *against* Pruitt what a fair-minded individual could easily find as an unreliable witness and testimony.

Another witness, Prospect 2's mother, initially gave a statement denying certain payments that she allegedly received from Pruitt. After her son had been granted immunity by the COI and assured that there would be no issues regarding his eligibility, the mother changed her story and gave a statement adverse to Pruitt. The COI seemed to give these inconsistencies no consideration.

Another witness, Prospect 9, initially gave a statement denying that he received improper benefits from the UT personnel director. After receiving limited immunity, Prospect 9 admitted to receiving benefits, particularly cash. During the COI hearing, Pruitt's attorney raised the issue of inconsistent statements and alleged that Prospect 9 changed his story due to eligibility issues. Again, the COI gave no consideration to the prior, inconsistent statement, and chose to resolve the inconsistencies against Pruitt.

There were also inconsistencies in statements given by the personnel director and Prospect 12. Again, without thorough explanation, the COI took the statement least favorable to Pruitt and considered it to be fact.

Pruitt's recruiting director gave a statement to the COI detailing the reasons why she

failed to report known violations. Her reasoning was that she feared retaliation and felt pressure from "those who are higher up within the organization." PID at page 27. One could envision this being a reasonable concern of lower-level coaching staff. However, the COI failed to provide any additional information on who the "higher up" individuals were. The PID provides no details on whether the COI investigated further to whom exactly the recruiting director was referring. The COI arbitrarily assumed that she was referring to Pruitt, but there is no additional information provided.

These are just a few examples of the overwhelming degree of conflicting and incomplete statements that Pruitt has a reasonable probability of showing that the COI arbitrarily accepted as fact. A reasonable-minded juror could conclude that the COI's infractions process was procedurally and substantively deficient. Pruitt was allowed no opportunity to cross-examine the witnesses regarding these inconsistencies. Pruitt further alleges that these statements, inconsistent or not, were not even sworn statements. Pruitt was not allowed to compel records from third parties, and he was unable to compel witnesses to sit for examination. This lack of transparency, due process, and fairness lends to the conclusion that the Plaintiff has at least a reasonable likelihood of success at trial.

Pruitt further alleges that the COI hearing lacked a genuine fact-finding purpose. Pruitt argues that UT was allowed to control what information the COI had before them. In the investigative process, Pruitt argues that UT was allowed access to documents and e-discovery platforms to which Pruitt was denied. Pruitt also alleges that UT was allowed to compel records from third parties. Because of this, Pruitt argues that UT was allowed to dictate the investigative process, and the COI simply relied on UT's investigation.

UT is not a party to this lawsuit. They are not on trial. They were the subject of the

COI's investigation just as Pruitt. UT used the investigative process to the extent they were allowed to by the COI. Regarding UT, the issue before the court is this: did the COI allow Pruitt the same discretion in his investigation that they allowed UT? There is a reasonable probability that Pruitt can show that the COI did not.

Pruitt has a reasonable likelihood of proving that, had he been given the opportunity for an objective, impartial, fact-finding process, the COI would have imposed a less-restrictive punishment, if one at all. Because Pruitt has a reasonable likelihood of success in proving to a jury that the COI process was arbitrary – or at least arbitrarily applied to him – the holding in *Birmingham News Co. v. Muse*, 638 So.2d 853 (Ala.1994) is distinguishable from this case. *Id. quoting Scott v. Kilpatrick*, 237 So. 2d 652, 655 (Ala.1970) ("Of course, if the acts of an association are the result of fraud, lack of jurisdiction, collusion, or arbitrariness, the courts will intervene to protect an injured [party's] rights.").

Balance of Hardships –

Finally, the hardship – if any – imposed on the NCAA by the injunction does not unreasonably outweigh the benefit to Pruitt by the granting of the injunction. The NCAA will continue its business as usual, suffering no immediate harm. Alternatively, Pruitt, if he were successful on the merits of his case, would suffer substantial harm during the pendency of the case. This balancing of the hardships favors Pruitt.

Accordingly, it is ORDERED, ADJUDGED and DECREED that the NCAA, its agents, employees, and any persons acting at the NCAA's direction are hereby enjoined from the following during the pendency of this litigation or until further order of the Court:

1. Enforcing the Show Cause Order and Coaching Restriction against the Plaintiff;

2. Interfering with Plaintiff's employment opportunities as a coach, analyst, or other

consultant for colleges and universities with athletic programs, as it relates to the Show Cause Order and Coaching Restriction; and

3. Enforcement of the NCAA's "Rule of Retribution" as it relates to the Plaintiff.

IT IS FURTHER ORDERED that, because the NCAA will suffer little or no financial harm from the entry of this injunction, the Plaintiff shall, within seven (7) days, post a de minimis bond with the Clerk of the Court in the amount of $2,500.00.

IT IS FURTHER ORDERED that the parties shall participate in mediation on or before December 22, 2025.

DONE this 15th day of December, 2025.

/s/ ANDREW J. HAIRSTON
CIRCUIT JUDGE