

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

STUDENTS AND PARENTS FOR)
PRIVACY, a voluntary unincorporated)
association; C.A., a minor, by and through her)
parent and guardian, N.A.; A.M., a minor, by)
and through her parents and guardians, S.M.)
and R.M.; N.G., a minor, by and through her)
parent and guardian, R.G.; A.V., a minor, by)
and through her parents and guardians, T.V.)
and A.T.V.; and B.W., a minor, by and)
through his parents and guardians, D.W. and)
V.W.,)

No. 1:16 CV 4945

The Hon. Jeffrey T. Gilbert,
Magistrate Judge

Plaintiffs,)

v.)

UNITED STATES DEPARTMENT OF)
EDUCATION; JOHN B. KING, JR., in his)
official capacity as United States Secretary of)
Education; UNITED STATES)
DEPARTMENT OF JUSTICE; LORETTA E.)
LYNCH, in her official capacity as United)
States Attorney General; and SCHOOL)
DIRECTORS OF TOWNSHIP HIGH)
SCHOOL DISTRICT 211, COUNTY OF)
COOK AND STATE OF ILLINOIS,)

Defendants,)

and)

STUDENTS A, B, and C, by and through)
their parents and legal guardians Parents A, B,)
and C, and the ILLINOIS SAFE SCHOOLS)
ALLIANCE,)

Intervenor-Defendants.

**JOINT STIPULATION REGARDING INTERVENOR-DEFENDANTS' RESPONSES
TO PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION**

The parties in the above-captioned matter hereby stipulate as follows:

WHEREAS, Plaintiffs moved to conduct discovery of Intervenor-Defendants on July 8, 2016, a motion that was denied by the Court on July 13, 2016;

WHEREAS, on July 15, 2016, the Court vacated its July 13 order denying Plaintiffs' motion and granted Plaintiffs' motion in part, ordering Student A, by and through her parent or legal guardian, to answer Plaintiffs' First Set of Requests for Admission [Dkt. No. 81-1] on or before July 21, 2016;

WHEREAS, Plaintiffs' First Set of Requests for Admission seek information of a highly personal nature regarding Student A;

NOW, THEREFORE, it is hereby stipulated and agreed between the parties, subject to Court approval, that:

1. Intervenor-Defendants' responses to Plaintiffs' First Set of Requests for Admission (the "Responses") shall be designated as Counsel Eyes Only. As such, the Responses shall only be shared with legal counsel for the parties and the Court, as specified below.

2. If any party wishes to use the Responses as an exhibit or attachment to a motion or other submission to this Court, that party must file that exhibit or attachment under seal.

3. Any reference, quote, or other mention of any information gleaned from or taken from the Responses by any party in a motion or other submission to this Court must be filed under seal. Any publicly-filed version of said motion or submission shall redact any information gleaned from or taken from the Responses.

4. No party shall quote, reference, or otherwise mention any information gleaned from the Responses publicly or in any filing that is not filed under seal.

5. All parties reserve the right to seek modification from the Court of any order approving this stipulation.

6. The parties agree to continue to maintain the confidentiality of the identities of any individuals who are proceeding under pseudonyms or by initials in this matter, including but not limited to any actions taken in connection with these Responses.

7. The parties agree to said stipulation and consent by way of electronic signature.

Dated: July 20, 2016

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