

**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-04945  
  
The Hon. Jorge L. Alonso,  
*District 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. )

**MOTION FOR LEAVE TO FILE UNDER SEAL BY STUDENTS A, B, AND C,  
BY AND THROUGH THEIR PARENTS AND LEGAL GUARDIANS**

Pursuant to Local Rules 5.8 and 26.2, Students A, B, and C, by and through their parents and legal guardians Parents A, B, and C, respectfully move this court for leave to file the original declarations with the unredacted signatures of Parents A, B, and C under seal.

In support of this motion, Students A, B, and C, by and through their parents and legal guardians Parents A, B, and C, state as follows:

1. In the Motion to Intervene as Defendants of Students A, B, and C, By and Through Their Parents and Legal Guardians, and of the Illinois Safe Schools Alliance (“Motion to Intervene”) filed concurrently herewith, Students A, B, and C seek to intervene as of right under Federal Rule of Civil Procedure 24(a), or alternatively, for permissive intervention under Federal Rule of Civil Procedure 24(b).

2. Students A, B, and C are minors and seek to proceed pseudonymously. If the Court grants the Motion to Intervene, Students A, B, and C will file a motion setting out the basis for this request.

3. This case is brought by and through the parents and legal guardians of Students A, B, and C, respectively Parent A, B, and C. In support of the Motion to Intervene, each Parent submitted a declaration containing their original signatures. The declarations of Parents A, B, and C (with only their signatures redacted) are attached as Exhibits 1-3 to the Memorandum of Law in Support of the Motion to Intervene, also filed concurrently herewith.

4. Parents A, B, and C recorded their original signatures on the declarations. These signatures reveal their identities, and by extension, reveal the identities of their minor children, Students A, B, and C. As will be explained further by motion if the Motion to Intervene is granted, the identities of Students A, B and C are of a highly sensitive nature and should not be disclosed to the public.

5. Accordingly, Parents A, B, and C’s original signatures have been redacted on the publicly-filed versions of their declarations. The declarants’ signatures are the only redactions in the declarations. If granted leave to file under seal, unredacted versions of the declarations of Parents A, B, and C will be filed.

For the reasons stated above, Students A, B, and C, by and through their parents and legal guardians Parents A, B, and C, respectfully request that the Court grant their motion to file the unredacted signatures on Parent A, B, and C's declarations under seal.

Dated: May 25, 2016

John Knight  
ROGER BALDWIN FOUNDATION OF  
ACLU, INC.  
180 North Michigan Avenue  
Suite 2300  
Chicago, IL 60601  
Telephone: (312) 201-9740 ext. 335  
Facsimile: (312) 288-5225  
jknight@aclu-il.org

- and -

Ria Tabacco Mar\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
Telephone: (212) 549-2627  
Facsimile: (212) 549-2650  
rmar@aclu.org

*\* application for pro hac vice admission  
forthcoming*

Respectfully submitted,

/s/ Britt M. Miller  
Britt M. Miller  
Timothy S. Bishop  
Laura R. Hammargren  
Linda X. Shi  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, IL 60606  
Telephone: (312) 782-0600  
Facsimile: (312) 701-7711  
bmiller@mayerbrown.com  
tbishop@mayerbrown.com  
lhammargren@mayerbrown.com  
lshi@mayerbrown.com

- and -

Catherine A. Bernard  
MAYER BROWN LLP  
1999 K Street, N.W.  
Washington, DC 20006-1101  
Telephone: (202) 263-3000  
Facsimile: (202) 263-3300  
cbernard@mayerbrown.com

*Counsel for Students A, B, and C, and the Illinois Safe Schools Alliance*