

**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	)	No. 1:16-CV-04945
parent and guardian, N.A.; A.M, a minor, by	)	
and through her parents and guardians, S.M.	)	The Hon. Jorge L. Alonso,
and R.M.; N.G., a minor, by and through her	)	<i>District Judge</i>
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.,	)	
	)	
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.	)	

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on Tuesday, May 31, 2016 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel will appear before the Honorable Jorge L. Alonso, or any judge sitting in his stead, in Room 1219 of the Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois, and present the Motion for Leave to File Under Seal by Students A, B, and C, By and Through Their Parents and Legal Guardians.

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*

**CERTIFICATE OF SERVICE**

I, Britt M. Miller, an attorney, hereby certify that on May 25, 2016, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** as well as the **MOTION FOR LEAVE TO FILE UNDER SEAL BY STUDENTS A, B, AND C, BY AND THROUGH THEIR PARENTS AND LEGAL GUARDIANS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Britt M. Miller

Britt M. Miller

MAYER BROWN LLP

71 South Wacker Drive

Chicago, IL 60606

Telephone: (312) 782-0600

Facsimile: (312) 701-7711

E-mail: [bmiller@mayerbrown.com](mailto:bmiller@mayerbrown.com)