UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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.**,

Plaintiffs,

vs.

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.

Case No. 1:16-cv-04945

The Honorable Jeffrey T. Gilbert, Magistrate Judge

Plaintiffs' Motion to File a Twenty-five Page Preliminary Injunction Reply Memorandum

Comes now Plaintiffs Students and Parents for Privacy, C.A., N.A., A.M., S.M., R.M., N.G., R.G., A.V., T.V., A.T.V., B.W., D.W., and V.W. ("Plaintiffs"), by and through counsel, and respectfully move this Court for an Order allowing them to file a 25-page Preliminary Injunction reply memorandum. In support of their motion, Plaintiffs state as follows:

1. Plaintiffs filed their motion for preliminary injunction on May 23, 2016. Dkt. 21.

2. Plaintiffs asked for leave to file a 33-page memorandum in support of their motion. Dkt. 13.

3. The Court granted Plaintiffs leave to file a memorandum of 25 pages. Dkt. 20.

4. The Federal Defendants requested leave to file a 35-page response memorandum. Dkt. 66. Plaintiffs did not oppose this motion. This Court granted the Federal Defendants' motion. Dkt. 70.

5. The District 211 Defendants requested leave to file a 25-page response memorandum. Dkt. 71. Plaintiffs did not oppose this motion. This Court granted the District 211 Defendants' motion. Dkt. 73.

6. The Intervenor-Defendants requested leave to file a 20-page response memorandum. Dkt. 74. Plaintiffs did not oppose this motion. This Court granted the Intervenor-Defendants' motion. Dkt. 77.

7. Accordingly, the Defendants have together filed 80 pages of briefing opposing Plaintiffs' motion for preliminary injunction, while Plaintiffs have only filed 25 pages in support of their motion.

8. In order to adequately reply to the arguments that the Defendants have made in their three responses in opposition, and to apprise the Court fully of how the law relates to the Defendants' arguments, the Plaintiffs request that they be allowed to file a reply brief that is no more than 25 pages in length.

9. On Wednesday, July 13, 2016, the Plaintiffs' counsel contacted all of the Defendants' counsel regarding the Plaintiffs' request for extra pages. Counsel for the Federal Defendants and Intervenor-Defendants responded that they do not object to the Plaintiffs'

motion. Counsel for the Defendant District 211 has not responded.

Respectfully submitted this 15th day of July, 2016.

By: /s/ Jeremy D. Tedesco

THOMAS L. BREJCHA, IL 0288446
PETER BREEN, IL 6271981
JOCELYN FLOYD, IL 6303312
THOMAS MORE SOCIETY
19 S. La Salle Street, Suite 603
Chicago, IL 60603
(312) 782-1680
(312) 782 -1887 Fax
tbrejcha@thomasmoresociety.org
pbreen@thomasmoresociety.org
jfloyd@thomasmoresociety.org

JEREMY D. TEDESCO, AZ 023497*
JOSEPH E. LARUE, AZ 031348*
ALLIANCE DEFENDING FREEDOM
15100 N. 90th Street
Scottsdale, Arizona 85260
(480) 444-0020
(480) 444-0028 Fax
jtedesco@adflegal.org
jlarue@adflegal.org

J. MATTHEW SHARP, GA 607842*
ALLIANCE DEFENDING FREEDOM
1000 Hurricane Shoals Road NE
Suite D-1100
Lawrenceville, Georgia 30043
(770) 339-0774
(770) 339-6744 Fax
msharp@adflegal.org

**Admitted Pro Hac Vice*

Attorneys for Plaintiffs

THIS DOCUMENT HAS BEEN ELECTRONICALLY FILED

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record who are registered users of the ECF system:

Patrick M. DePoy
Erin D. Fowler
Sally J. Scott
Jennifer A. Smith
Michael A. Warner, Jr.
FRANCZEK RADELET P.C.
300 S. Wacker Drive, Suite 3400
Chicago, IL 60606

Attorneys for Defendant Board of Education of Township High School District No. 211

Megan Anne Crowley
Sheila Lieber
UNITED STATES DEPARTMENT OF JUSTICE, CIVIL DIVISION, FEDERAL PROGRAMS BRANCH
20 Massachusetts Ave., N.W.
Washington, DC 20001

Attorney for Defendants United States Department of Education, John B. King, Jr., United States Department of Justice, and Loretta E. Lynch

Britt M. Miller
Laura R. Hammargren
Linda X. Shi
Timothy S. Bishop
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606

Catherine A. Bernard
MAYER BROWN LLP
1999 K Street, N.W.
Washington, DC 20006

John A. Knight
ROGER BALDWIN FOUNDATION OF ACLU, INC.
180 N. Michigan, Suite 2300
Chicago, IL 60601

Ria Tabacco Mar
AMERICAN CIVIL LIBERTIES UNION FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004-2400

Attorneys for Intervenor Defendants Students A, B,and C, and the Illinois Safe Schools Alliance

By: /s/ Jeremy D. Tedesco

JEREMY D. TEDESCO
Attorney for Plaintiffs