

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JOEL DOE, a minor, by and through his
Guardians JOHN DOE and JANE DOE, et al.,

Plaintiffs,

v.

BOYERTOWN AREA SCHOOL DISTRICT,
et al.,

Defendants,

and

PENNSYLVANIA YOUTH CONGRESS
FOUNDATION,

Intervenor-Defendant.

Civil Action No. 17-1249-EGS

**INTERVENOR-DEFENDANT PENNSYLVANIA YOUTH CONGRESS
FOUNDATION'S RESPONSE TO PLAINTIFFS' MOTION TO PRESENT TESTIMONY
*IN CAMERA***

Intervenor-Defendant Pennsylvania Youth Congress Foundation ("PYC") files this response solely to clarify its position with respect to the public's access to the Plaintiffs' testimony. PYC does not object to measures intended to protect the anonymity of the Plaintiffs, but agrees that any limitation of the public's access to the preliminary injunction hearing must be narrowly tailored. PYC believes that requires providing the public access that is as close to possible to being able to hear the Plaintiffs' testimony contemporaneously, and without cost. Transcripts of testimony are not normally made available to the public without cost, but Plaintiffs have offered to procure a redacted transcript for the public. If Plaintiffs are permitted to testify *in camera*, therefore, PYC urges the Court to require Plaintiffs to file a redacted

transcript within twenty-four (24) hours of the testimony, whether that transcript is prepared by the Court's personnel or an independent stenographer. PYC would have no objection to any other procedure that provides the public with near-contemporaneous access to the Plaintiffs' testimony.

Dated: July 15, 2017

Respectfully submitted,

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