

**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. Jorge L. Alonso,
District Court 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 MOTION TO ESTABLISH A DEADLINE TO FILE AN AMENDED
COMPLAINT, FOR AN EXTENSION OF TIME TO RESPOND TO PLAINTIFFS'
COMPLAINT, AND TO MODIFY THE STATUS HEARING SCHEDULE**

The Parties respectfully request this Court to: (1) establish a deadline for Plaintiffs to file an Amended Complaint; (2) extend the Defendants' deadline to respond to Plaintiffs' complaint; and (3) reschedule the status hearing currently set for February 8, 2018. In support of their motion, the Parties state as follows:

1. On December 29, 2017, this Court issued an order overruling Plaintiffs' objections to the Report and Recommendation of the Magistrate Judge, adopting the Report and Recommendation, and denying Plaintiffs' Motion for a Preliminary Injunction. Dkt. No. 191. The Court ordered Defendants to answer or otherwise respond to Plaintiffs' complaint by January 30, 2018, and set a status hearing for February 8, 2018. *Id.*

2. Plaintiffs intend to file an Amended Complaint as a matter of course pursuant to Rule 15(a)(1) of the Federal Rules of Civil Procedure.

3. The parties agree that it would be inefficient for Defendants to respond to Plaintiffs' complaint on January 30, 2018, given Plaintiffs' intention to file an amended complaint.

4. Accordingly, the Parties respectfully ask this Court to modify the existing schedule and issue an order that requires:

- a. Plaintiffs to file an Amended Complaint within 21 days of the Court ruling on this motion; and
- b. Defendants to answer or otherwise respond to the Amended Complaint within 45 days of the Amended Complaint being filed.

5. The Parties also respectfully ask that the Court postpone the status conference until 2 weeks after the last Defendant files its response to the Amended Complaint. The parties

believe they will have a better understanding of next steps and potential discovery once the Defendants' responses have been filed.

For the foregoing reasons and for good cause shown, the Parties respectfully request this Court to enter an order granting this motion.

Respectfully submitted,

Dated: January 24, 2018

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Dated: January 24, 2018

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