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

17 1249

JOEL DOE, a minor; by and through his
Guardians JOHN DOE and JANE DOE,

Plaintiff,

vs.

BOYERTOWN AREA SCHOOL
DISTRICT; DR. RICHARD FAIDLEY,
in his official capacity as
Superintendent of the Boyertown Area
School District; DR. BRETT COOPER,
in his official capacity as Principal; and
DR. E. WAYNE FOLEY, in his official
capacity as Assistant Principal.

Defendants.

Case No. _____

**PLAINTIFF'S MOTION TO
PROCEED PSEUDONYMOUSLY**

FILED

MAR 21 2017

**KATE BARKMAN, Clerk
By _____ Dep. Clerk**

PLAINTIFF'S MOTION TO PROCEED PSEUDONYMOUSLY

Plaintiff Joel Doe, a minor, by and through his Guardians John Doe and Jane Doe, hereby respectfully moves this Court for an order permitting him and his guardians to proceed in this case using the pseudonyms ascribed to them in Plaintiff's Complaint.

1. Plaintiff makes this request to protect him and his guardians from publicly revealing their identities so that they and minor family members may avoid embarrassment, harassment and retaliation from peers and members of the public. *See* Dec. ¶¶ 5-6.

2. The need for anonymity from the public is particularly acute given the contentious and politically charged nature of this case and the highly sensitive subject matter of their testimony.

3. While Plaintiff seeks public anonymity, he is not requesting anonymity from Defendants.

4. Plaintiff's motion is supported by Plaintiff's contemporaneously filed memorandum of law and accompanying declaration.

Respectfully submitted this 21st day of March, 2017.


By: /s/ Randall L. Wenger

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*Application for Admission Forthcoming

***Pro Hac Vice* Applications Forthcoming

Attorneys for Plaintiff

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ORDER

IT IS HEREBY ORDERED that the Plaintiff and his Guardians may proceed
in this case using the pseudonyms ascribed to them in Plaintiff's Complaint.

By the Court:

J. _____

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on Tuesday, March 21, 2017, the foregoing
was filed with the Clerk of Court and will be delivered to Defendants
simultaneously with the Complaint.

/s/ RANDALL L. WENGER
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FILED

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KATE BARKMAN, Clerk
By _____ **Dep. Clerk**