

**EGS**

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

**17 1249**

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

Case No. \_\_\_\_\_

Plaintiff,

**DECLARATION**

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.

**FILED**

**MAR 21 2017**

KATE BARKMAN, Clerk  
By \_\_\_\_\_ Dep. Clerk

Defendants.

**DECLARATION OF JEREMY SAMEK**

I, Jeremy Samek, hereby declare the following:

1. I make this declaration based upon my personal knowledge.
2. The Plaintiff is filing a motion to proceed with pseudonyms.
3. The Plaintiff and his Guardians seek leave to proceed in this case using the pseudonyms ascribed to them in Plaintiff's Complaint.
4. Everyone that motion would apply to is either a minor child or Guardian of the minor child.
5. Plaintiff told me that publically exposing the humiliation and loss of dignity he has suffered, would add to his embarrassment.
6. Plaintiff told me that he is fearful that he and his younger minor family members would face severe harm in the form of harassment from some peers

and retaliation and harassment from some members of the public.

7. The Guardians need to proceed with pseudonyms, because if their real names were revealed in the pleadings and briefs publicly available in this case, it would be easy to determine the identities of the minor children.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 20th, 2017.

  
\_\_\_\_\_  
Jeremy Samek