

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STUDENTS AND PARENTS FOR PRIVACY, a
voluntary unincorporated association; and
VICTORIA WILSON,

Plaintiffs,

vs.

**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 Jorge L. Alonso

**Plaintiffs' Unopposed Motion to Modify Status Conference Schedule and Set Briefing
Schedule for Defendants' Motions to Dismiss**

Plaintiffs Students and Parents for Privacy and Victoria Wilson respectfully move this Court to reschedule the pending joint status report and ensuing status conference, and to establish a briefing schedule for the two recently filed Defendants' motions to dismiss (Defendant Bd. of Educ. of Township High Sch. Dist. 211's Mot. to Dismiss [ECF 202] and Intervenor-Defendants' Mot. to Dismiss the First Amended Complaint [ECF 204]). Plaintiffs' counsel met and conferred with counsel for the Defendant District and the Intervenor-Defendants, and Defendants do not oppose this motion.

Per this Court's Minute Order of January 25, 2018 [ECF 195], the Court set a filing date for an amended complaint on February 15, 2018 (duly filed as ECF 197) while resetting the joint status

report to April 13, 2018, to be followed by a status conference on April 18, 2018. Meanwhile, Defendants noticed their motions to dismiss for presentment on April 11, 2018. [ECF 206, ECF 207].

The parties see the status report and conference as facilitating orderly discovery and related matters as the case proceeds but with the pending motions to dismiss, it is likely premature to predict discovery needs as a ruling adverse to the Plaintiffs would moot any plans resulting from the status report and conference. Similarly, a ruling favorable to the Plaintiffs would undoubtedly inform the parties as to what information should be pursued in the ensuing discovery phase and make that phase more focused and efficient.

For the sake of judicial efficiency, Plaintiffs therefore respectfully request that the Court reset the status conference to a date 30 days after the Court rules on the pending motions to dismiss, and schedules the joint status report for a date 7 days before the status conference.

As to the pending motions to dismiss, Plaintiffs respectfully request that the Court schedule Plaintiffs' responsive brief to be due 21 days after the date of its order on this motion, and further requests that the Defendants' respective reply briefs be filed 21 days after the date that Plaintiffs' responsive brief is to be filed.

Finally, as there is substantial commonality in the arguments raised between the two motions to dismiss, Plaintiffs respectfully request that the Court permit Plaintiffs to file a single responsive brief, not to exceed 35 pages that responds to both motions to dismiss, rather than file largely duplicative individual responses to the two pending motions.

Respectfully submitted this the 5th day of April, 2018.

By: /s/ Thomas Olp

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

By: /s/ Thomas Olp