

Herbert G. Grey, OSB #810250
4800 SW Griffith Drive, Suite 320
Beaverton, OR 97005-8716
Telephone: 503-641-4908
Email: herb@greylaw.org

Ryan Adams, OSB # 150778
181 N. Grant Street, Suite 212
Canby, OR 97013
Telephone: 503-266-5590
Email: ryan@ruralbusinessattorneys.com

Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Portland Division

PARENTS FOR PRIVACY; KRIS GOLLY
and JON GOLLY, individually and as
guardians ad litem for T.F.; LINDSAY
GOLLY; NICOLE LILLIE; MELISSA
GREGORY, individually and as guardian
ad litem for T.F.; and PARENTS RIGHTS
IN EDUCATION, an Oregon nonprofit
corporation,

Case No. 3:17-CV-01813-HZ

PETITION FOR APPOINTMENT
OF GUARDIAN AD LITEM FOR
T.F.

Plaintiffs,

v.

DALLAS SCHOOL DISTRICT NO. 2; OREGON
DEPARTMENT OF EDUCATION; GOVERNOR
KATE BROWN, in her official capacity as the
Superintendent of Public Instruction; and UNITED
STATES DEPARTMENT OF EDUCATION;
BETSY DEVOS, in her official capacity as United
States Secretary of Education as successor to JOHN
B. KING, JR.; UNITED STATES DEPARTMENT
OF JUSTICE; JEFF SESSIONS, in his official capacity

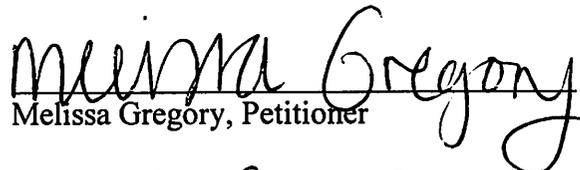
as United States Attorney General, as successor to
LORETTA F. LYNCH;

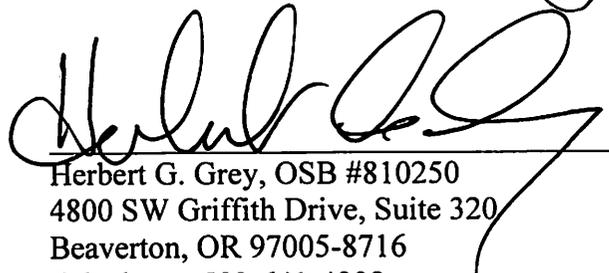
Defendants.

Pursuant to ORCP 27, Petitioner MELISSA GREGORY hereby seeks
appointment as guardian ad litem for minor T.F. as follows:

1. Petitioner is a biological and custodial parent of T.F., a minor.
2. T.F. resides with petitioners [REDACTED]. T.F.
was born on [REDACTED] and is currently 16 years of age.
3. Petitioner is a resident of Polk County, Oregon.
4. T.F. is the owner of a claim against defendants arising out of the adoption and
implementation of a "Student Safety Policy" at Dallas High School. Litigation is
necessary to resolve this claim, and a guardian ad litem must be appointed to
represent the interests of T.F. to pursue his rights.
5. Petitioner is a suitable person to be guardian ad litem for T.F. and is not
disqualified from serving in such capacity.

DATED this 5 day of December, 2017.


Melissa Gregory, Petitioner


Herbert G. Grey, OSB #810250
4800 SW Griffith Drive, Suite 320
Beaverton, OR 97005-8716
Telephone: 503-641-4908
Email: herb@greylaw.org

Ryan Adams, OSB #150778
181 N. Grant Street, Suite 212
Canby, OR 97013
Telephone: 503-266-5590
Email: ryan@ruralbusinessattorneys.com
Of Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITION FOR APPOINTMENT OF GUARDIAN AD LITEM OF T.F. on the following via the indicated method(s) of service:

Peter R. Mersereau
Mersereau Shannon LLP
111 SW Columbia Street, Suite 1100
Portland, OR 97201-5865
Of Attorneys for Dallas School District

 x **MAILING** certified full, true and correct copies thereof in a sealed, first class postage-prepaid envelope, addressed to the attorney(s) shown above at their last known office address(es), and deposited with the U.S. Postal Service at Portland/Beaverton, Oregon, on the date set forth below.

 ELECTRONIC FILING utilizing the Court's electronic filing system

 x **EMAILING** certified full, true and correct copies thereof to the attorney(s) shown above at their last known email address(es) on the date set forth below.

 HAND DELIVERING certified full, true and correct copies thereof to the attorney(s) shown above at their last known office address(es), on the date set forth below.

 OVERNIGHT COURIER mailing of certified full, true and correct copies thereof in a sealed, prepaid envelope, addressed to the attorney(s) shown above at their last known office address(es), on the date set forth below.

DATED this 21~~st~~ day of December, 2017.


Herbert G. Grey, OSB #810250
Of Attorneys for Petitioner