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Of Attorneys for Defendant
Dallas School District No. 2

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

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

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.

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

DECLARATION OF PETER R.
MERSEREAU IN SUPPORT OF
MOTION FOR EXTENSION OF
INITIAL APPEARANCE DEADLINE

I, Peter R. Mersereau, declare:

1. I am one of the attorneys for defendant Dallas School District No. 2 (“defendant”) in this matter. I make this declaration based upon personal knowledge. I am competent to testify as to the matters stated herein.

2. Defendant was served with the summons and complaint and executed a waiver of service of summons on or about November 20, 2017. The complaint names multiple federal defendants, none of whom has yet appeared. The complaint also named state defendants which have since been dismissed.

3. I have not yet had an opportunity to fully review the underlying facts of this matter and the potential legal defenses available to the district. In addition, the federal defendants’ responses to plaintiffs’ claims will help inform the district’s response, and I currently do not know which defenses the federal defendants intend to assert.

4. Therefore, I request until February 20, 2018 in which to obtain sufficient information to enter an appropriate first appearance.

5. Plaintiffs’ counsel consents to this motion for extension of initial appearance deadline.

6. This motion is not made for purposes of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: January 17, 2018.

MERSEREAU SHANNON LLP

s/ Peter R. Mersereau
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