

PETER R. MERSEREAU, OSB No. 732028

pmersereau@mershanlaw.com

BETH F. PLASS, OSB No. 122031

bplass@mershanlaw.com

MERSEREAU SHANNON LLP

111 SW Columbia Street, Suite 1100

Portland, Oregon 97201-5865

Telephone: 503.226.6400

Facsimile: 503.226.0383

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
UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE
DEFENDANT DALLAS SCHOOL
DISTRICT NO. 2'S REPLY IN
SUPPORT OF MOTION TO DISMISS

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 respectfully moves the Court for its order extending the current deadline of March 20, 2018 to March 26, 2018, for defendant to file its reply memorandum in support of its motion to dismiss.
3. This request for an extension is made for the reason that conflicts have arisen with other matters, and counsel for defendant is therefore unable to comply with the current deadline.
4. Plaintiffs’ counsel does not object to this motion for extension of the filing deadline.
5. 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: March 19, 2018.

MERSEREAU SHANNON LLP

s/ Peter R. Mersereau
PETER R. MERSEREAU, OSB No. 732028
pmersereau@mershanlaw.com
503.226.6400
Of Attorneys for Defendant
Dallas School District No. 2

PAGE 2 - DECLARATION OF PETER R. MERSEREAU

MERSEREAU SHANNON LLP
111 SW COLUMBIA STREET, SUITE 1100
PORTLAND, OREGON 97201-5865
(503) 226-6400