



Case No. 17-3113

UNITED STATES COURT OF APPEALS  
FOR THE THIRD CIRCUIT

JOEL DOE, a minor; by and through his Guardians JOHN DOE and JANE DOE; MARY SMITH; JACK JONES, a minor; by and through his Parents JOHN JONES and JANE JONES; and MACY ROE,  
*Appellants*

v.

BOYERTOWN AREA SCHOOL DISTRICT; DR. BRETT COOPER, in his official capacity as Principal\*; DR. E. WAYNE FOLEY, in his official capacity as Assistant Principal\*; DAVID KREM, Acting Superintendent\*,  
*Appellees*

and

PENNSYLVANIA YOUTH CONGRESS FOUNDATION,  
*Appellee-Intervenor*

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**MOTION OF WOMEN’S LIBERATION FRONT FOR LEAVE TO FILE  
*AMICUS CURIAE* BRIEF IN SUPPORT OF APPELLANTS’ PETITION  
FOR REHEARING EN BANC**

The Women’s Liberation Front (WoLF) moves for leave to file an *amicus curiae* brief in support of Appellants in the above-captioned case under Federal Rule of Appellate Procedure 29. Movant states the following in support of its Motion:

1. WoLF is a radical feminist organization dedicated to the total liberation of women.

2. WoLF's core mission is to fight to end male violence, regain reproductive sovereignty, and ultimately dismantle the gender-caste system.

3. WoLF has fought to protect the rights and privacy of women and girls. In addition to individual case work, WoLF works internationally to inform the public about risks to the rights and privacy of women and girls.

4. WoLF fights for women and girls in numerous capacities. Thus, WoLF, and the thousands of persons for whom they advocate have a particular interest in the outcome of this case.

5. This case is of significant concern to the *amicus* because the Panel's ruling in this matter represents a threat to the privacy and safety of women and girls throughout the Third Circuit.

6. The Panel improperly ruled that self-identified "trans gender" students make up a coherent legal category of persons. If this ruling is permitted to stand, it will pose a grave threat to the privacy and safety of women and girls.

7. Under Federal Rule of Appellate Procedure 29, the proposed brief is being filed along with this Motion.

8. This Motion for Leave has been filed because Movant has not received consent to file from Appellees.

Respectfully submitted:

/s L. Theodore Hoppe, Jr.  
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(Application for Admission Pending)

***Counsel for Women's Liberation  
Front***

Date: 7/9/18

***CERTIFICATE OF SERVICE***

The undersigned hereby certifies that on July 9, 2018, the foregoing was filed electronically and served on the other parties via the court's ECF system.

*/s L. Theodore Hoppe, Jr.*  
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