

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

Ryan Adams, OSB # 150778  
Email: [ryan@ruralbusinessattorneys.com](mailto:ryan@ruralbusinessattorneys.com)  
Caleb S. Leonard, OSB # 153736  
E-mail: [Caleb@RuralBusinessAttorneys.com](mailto:Caleb@RuralBusinessAttorneys.com)  
181 N. Grant Street, Suite 212  
Canby, OR 97013  
Telephone: 503-266-5590

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

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,

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

NOTICE OF APPEAL

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.

Notice is hereby given that all plaintiffs in the above-named case except Lindsay Golly hereby appeal to the United States Court of Appeals for the Ninth Circuit from the Opinion and Order (Docket No. 69) and Final Judgment (Docket No. 70) entered in this action on the 24th day of July, 2018, that granted the respective motions to dismiss with prejudice of Defendant Dallas School District No. 2, Federal Defendants, defendant-intervenor Basic Rights Oregon, and amici Governor Kate Brown and Oregon Department of Education.

The Plaintiffs have paid the filing fee of \$505 associated with a Notice of Appeal. Attached is the Representation Statement required by Circuit Rule 3-2.

DATED this 21st day of August 2018.

/s/ Ryan Adams, OSB 150778  
Herbert G. Grey, OSB #810250  
4800 SW Griffith Drive, Suite 320  
Beaverton, OR 97005-8716  
Telephone: 503-641-4908  
Email: [herb@greylaw.org](mailto:herb@greylaw.org)

Ryan Adams, OSB #150778  
Caleb S. Leonard, OSB #153736  
181 N. Grant Street, Suite 212  
Canby, OR 97013  
Telephone: 503-266-5590  
Email: [ryan@ruralbusinessattorneys.com](mailto:ryan@ruralbusinessattorneys.com)

Of Attorneys for Plaintiffs

## REPRESENTATION STATEMENT

As required by Circuit Rule 3-2, the following are "all parties to the action along with the names, addresses and telephone numbers of their respective counsel, if any":

Party	Party's Counsel
<p><b>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.; Parents Rights In Education, an Oregon Nonprofit Corporation</b></p>	<p><i>Herbert G. Grey</i>, OSB #810250 4800 SW Griffith Drive, Suite 320 Beaverton, OR 97005-8716 Telephone: 503-641-4908 Email: <a href="mailto:herb@greylaw.org">herb@greylaw.org</a></p> <p><i>Ryan Adams</i>, OSB #150778 <i>Caleb S. Leonard</i>, OSB #153736 181 N. Grant Street, Suite 212 Canby, OR 97013 Telephone: 503-266-5590 Email: <a href="mailto:ryan@ruralbusinessattorneys.com">ryan@ruralbusinessattorneys.com</a></p>
<p><b>Defendant Dallas School District No. 2</b></p>	<p><i>Peter R. Mersereau</i> <i>Beth F. Plass</i> Mersereau Shannon LLP 111 SW Columbia Street, Suite 1100 Portland, OR 97201</p>
<p><b>Defendants United States Department of Education, Betsy Devos, United States Department of Justice, and Jeff Sessions</b></p>	<p><i>Chad A. Readler</i> <i>Billy J. Williams</i> <i>Carlotta P. Wells</i> <i>James O. Bickford</i> United States Department of Justice 20 Massachusetts Ave., NW Washington, DC 20530</p>

<p><b>Defendant-Intervenor Basic Rights Oregon</b></p>	<p><i>Darin M. Sands</i> Lane Powell PC 601 SW Second Avenue, Suite 2100 Portland, OR 97204</p> <p><i>Mathew W. dos Santos</i> <i>Kelly Simon</i> ACLU Foundation of Oregon P.O. Box 40585 Portland, OR 97240</p> <p><i>Gabriel Z. Arkles</i> <i>Shayna A. Medley-Warsoff</i> ACLU Foundation 125 Broad Street, 18th Floor New York, NY 10004</p>
<p><b>Amici Governor Kate Brown and Oregon Department of Education</b></p>	<p><i>Ellen F. Rosenblum</i> <i>Sarah Weston</i> <i>Patricia Rincon</i> <i>Carla A. Scott</i> Oregon Department of Justice 100 SW Market Street Portland, OR 97201</p>

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing Notice of Appeal on the following via the indicated method(s) of service:

<p><i>Peter R. Mersereau</i>  <i>Beth F. Plass</i>                  Mersereau Shannon LLP                  111 SW Columbia Street, Suite 1100                  Portland, OR 97201</p> <p><b>Attorneys for Defendant                  Dallas School District No. 2</b></p>	<p><i>Darin M. Sands</i>                  Lane Powell PC                  601 SW Second Avenue, Suite 2100                  Portland, OR 97204</p> <p><i>Mathew W. dos Santos</i>  <i>Kelly Simon</i>                  ACLU Foundation of Oregon                  P.O. Box 40585                  Portland, OR 97240</p> <p><i>Gabriel Z. Arkles</i>  <i>Shayna A. Medley-Warsoff</i>                  ACLU Foundation                  125 Broad Street, 18th Floor                  New York, NY 10004</p> <p><b>Attorneys for Defendant-                  Intervenor Basic Rights                  Oregon</b></p>
<p><i>Chad A. Readler</i>  <i>Billy J. Williams</i>  <i>Carlotta P. Wells</i>  <i>James O. Bickford</i>                  United States Department of Justice                  20 Massachusetts Ave., NW                  Washington, DC 20530</p> <p><b>Attorneys for Defendants                  United States Department                  of Education, Betsy Devos,                  United States Department of                  Justice, and Jeff Sessions</b></p>	<p><i>Ellen F. Rosenblum</i>  <i>Sarah Weston</i>  <i>Patricia Rincon</i>  <i>Carla A. Scott</i>                  Oregon Department of Justice                  100 SW Market Street                  Portland, OR 97201</p> <p><b>Attorneys for Amici Governor Kate                  Brown and Oregon Department                  of Education</b></p>

\_\_\_\_\_ **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.

  X   **ELECTRONIC FILING** utilizing the Court's electronic filing system

\_\_\_\_\_ **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.

DATED this 21st day of August, 2018.

/s/ Ryan Adams, OSB 150778

Herbert G. Grey, OSB #810250

Ryan Adams, OSB # 150778

Caleb S. Leonard, OSB # 153736

Of Attorneys for Plaintiffs