

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

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	:	
ALLISON DAWN BLIXT and LUCAS	:	
ALEXANDER ZACCARI-BLIXT,	:	
	:	
Plaintiffs,	:	
	:	Docket No. 1:18-CV-00124
v.	:	
	:	
THE UNITED STATES DEPARTMENT OF STATE,	:	
and THE HONORABLE REX W. TILLERSON,	:	
Secretary of State,	:	
	:	
Defendants.	:	
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**PLAINTIFFS ALLISON DAWN BLIXT AND LUCAS ALEXANDER  
ZACCARI-BLIXT’S MOTION TO WAIVE THE IDENTIFICATION OF ADDRESS  
REQUIREMENTS OF LOCAL RULE 5.1(C)(1)**

PLEASE TAKE NOTICE that upon the accompanying memorandum, dated January 22, 2018, plaintiffs Allison Dawn Blixt and Lucas Alexander Zaccari-Blixt move this Court to waive the requirement of Civil Rule 5.1(c)(1) of the Local Rules of the United States District Court for the District of Columbia that plaintiffs provide their full residence address in their first filing in the Court.

Dated: Washington, D.C.  
*January 22, 2018*

Respectfully submitted,

SULLIVAN & CROMWELL LLP

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*Attorneys for Plaintiffs*

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and THE HONORABLE REX W. TILLERSON,	:	
Secretary of State,	:	
	:	
Defendants.	:	
	x	

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’ MOTION TO WAIVE THE  
IDENTIFICATION OF ADDRESS REQUIREMENTS OF LOCAL RULE 5.1(C)(1)**

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*Counsel for Plaintiffs*

January 22, 2018

Plaintiffs Allison Dawn Blixt (“Allison”) and Lucas Alexander Zaccari-Blixt (“Lucas”) (collectively, “Plaintiffs”) respectfully submit this memorandum in support of *Plaintiffs’ Motion to Waive the Identification of Address Requirements of Local Rule 5.1(c)(1)*.

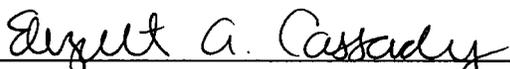
Plaintiffs commenced the above-captioned action (“Action”) today by filing in the Court a complaint (ECF No. 1), seeking a declaration that the United States government recognize the citizenship of Lucas, Allison’s two-year-old child. This Action touches upon the most intimate interests of family life, including those relating to marriage and procreation, and directly concerns the rights and interests of a very young child. Given the extreme sensitivity of the matters at issue in the Action and the potential harms from public disclosure of Plaintiffs’ home address, Plaintiffs respectfully request that the Court waive the requirement of Civil Rule 5.1(c) of the Local Rules of the United States District Court for the District of Columbia that they disclose in their first public filing their full residence address. Plaintiffs respectfully submit that the requested relief is justified to protect the interests, including potentially the safety, of a very young child and his family.

Plaintiffs are prepared to submit their address in a separate filing under seal at the Court's direction.

Dated: Washington, D.C.  
January 22, 2018

Respectfully submitted,

SULLIVAN & CROMWELL LLP

  
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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

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ALLISON DAWN BLIXT and LUCAS	:	
ALEXANDER ZACCARI-BLIXT,	:	
	:	
Plaintiffs,	:	[PROPOSED] ORDER
	:	Docket No. 18-CV-00124
	:	
v.	:	
	:	
THE UNITED STATES DEPARTMENT OF STATE,	:	
and THE HONORABLE REX W. TILLERSON,	:	
Secretary of State,	:	
	:	
Defendants.	:	
	:	
-----		X

**[PROPOSED] ORDER GRANTING ALLISON DAWN BLIXT AND LUCAS  
ALEXANDER ZACCARI-BLIXT’S MOTION TO WAIVE THE IDENTIFICATION OF  
ADDRESS REQUIREMENTS OF LOCAL RULE 5.1(C)(1)**

Upon consideration of Allison Dawn Blixt and Lucas Alexander Zaccari-Blixt’s Motion to Waive the Identification of Address Requirements of Local Rule 5.1(c)(1), and the memorandum submitted in support thereof, the Court has determined that Allison Dawn Blixt and Lucas Alexander Zaccari-Blixt’s Motion to Waive the Identification of Address Requirements of Local Rule 5.1(c)(1), should be, and hereby is, GRANTED.

Dated: \_\_\_\_\_, 2018

\_\_\_\_\_  
United States District Judge