

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

SELINA SOULE, et al.,	:	CIVIL ACTION NO.
Plaintiffs,	:	3:20-cv-00201 (RNC)
	:	
v.	:	
	:	
CONNECTICUT ASSOCIATION OF	:	
SCHOOLS, INC., et al.,	:	
Defendants.	:	March 2, 2020

MEMORANDUM IN
SUPPORT OF MOTION
OF ANDRAYA YEARWOOD AND
THANIA EDWARDS, ON BEHALF OF
HER DAUGHTER, T.M., TO INTERVENE AS DEFENDANTS

Defendant Connecticut Association of Schools, Inc. writes to confirm that it has no objection to Andraya Yearwood (“Andraya”) or T.M. intervening in this matter. Given the allegations directed specifically at them and Plaintiffs’ ongoing invocation of their names and attempt to preclude them from running in their own final seasons of track eligibility, both Andraya and T.M. have a substantial interest in the matter allowing them to intervene as of right. *See Bd. Of Educ. of the Highland Local Sch. Dist. v. U.S. Dep’t of Educ.*, No. 2:16-CV-524, 2016 WL 4269080, at *4 (S.D. Ohio Aug. 15, 2016) (holding that Jane Doe, a transgender student, had substantial interest allowing her to intervene in lawsuit seeking to exclude her from using the girls’ restrooms). Furthermore, the current Defendants’ insufficient knowledge concerning Andraya and Terry’s private medical and physical characteristics counsels in favor of intervention as of right. *See id.*

CERTIFICATION OF SERVICE

This is to certify that on March 2, 2020, a copy of the foregoing Memorandum in Support of Andraya Yearwood and Thania Edwards on Behalf of Her Daughter, T.M., To Intervene as Defendants was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peter J. Murphy

Peter J. Murphy