

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

SELINA SOULE, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	No. 3:20-cv-00201-RNC
)	
CONNECTICUT ASSOCIATION OF)	
SCHOOLS, INC. <i>et al.</i> ,)	
)	April 9, 2020
<i>Defendants,</i>)	
)	
and)	
)	
ANDRAYA YEARWOOD and THANIA)	
EDWARDS on behalf of her daughter, T.M.,)	
)	
<i>Proposed Intervenors.</i>)	
)	

**MOTION TO EXTEND DEADLINE FOR FILING
CERTIFICATES OF GOOD STANDING**

As a result of closures caused by the COVID-19 pandemic, Proposed Intervenors Andraya Yearwood (“Andraya”) and Thania Edwards on behalf of her daughter T.M. (“Terry”) respectfully request that this Court extend the Local Rule 83.1(d) deadline for filing certificates of good standing in connection with counsel’s motion to appear *pro hac vice* to July 1, 2020.

In support of the motion Proposed Intervenors state as follows:

1. On February 21, 2020, Proposed Intervenors filed a motion for counsel from the American Civil Liberties Union to appear *pro hac vice*. ECF 35.
2. On February 25, 2020, the Court granted the motion. ECF 38.
3. Pursuant to Local Rule 83.1(d), the deadline for counsel appearing *pro hac vice* to file certificates of good standing is April 25, 2020.

4. As a result of the COVID-19 pandemic, the American Civil Liberties Union's offices in New York City have been closed since March 13, 2020.

5. Also as a result of the COVID-19 pandemic, the New York State courts responsible for issuing certificates of good standing in New York City are not allowing counsel to obtain certificates of good standing in person. Instead, counsel must request a certificate of good standing by mail. The clerk of the court has advised counsel that requests for certificates of good standing will take longer than usual to process.

6. Counsel have mailed letters requesting certificates of good standing, but there is a possibility that those requests may not be processed in time for counsel to file the certificates of good standing with this Court by April 25, 2020.

7. Accordingly, out of an abundance of caution, Proposed Intervenors respectfully requests that the deadline for filing certificates of good standing be extended to July 1, 2020.

Respectfully submitted,

/s/ Chase Strangio
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