

Richard Eppink (Bar No. 7503)  
AMERICAN CIVIL LIBERTIES UNION OF IDAHO  
FOUNDATION  
P. O. Box 1897  
Boise, ID 83701  
T: (208) 344-9750 ext. 1202  
REppink@acluidaho.org

Kathleen Hartnett\*  
COOLEY LLP  
101 California Street, 5th Floor  
San Francisco, CA 94111-5800  
T: (415) 693-2000  
F: (415) 693-2222  
khartnett@cooley.com

Chase Strangio\*  
James Esseks\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad St.  
New York, NY 10004  
T: (212) 549-2569  
garkles@aclu.org  
jesseks@aclu.org  
cstrangio@aclu.org

Andrew Barr\*  
COOLEY LLP  
380 Interlocken Crescent, Ste. 900  
Broomfield, CO 80021-8023  
T: (720) 566-4000  
F: (720) 566-4099  
abarr@cooley.com

Catherine West\*  
LEGAL VOICE  
907 Pine Street, Unit 500  
Seattle, WA 98101  
T: (206) 682-9552  
F: (206) 682-9556  
cwest@legalvoice.org

*Attorneys for Plaintiffs*

*\*Admitted pro hac vice*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

LINDSAY HECOX, et al.,

*Plaintiffs,*

v.

BRADLEY LITTLE, et al.,

*Defendants.*

Case No. 1:20-cv-184-DCN

**UNOPPOSED MOTION TO LIFT  
STAY FOR SOLE PURPOSE OF  
VACATING PROTECTIVE  
ORDER**

Plaintiffs Lindsay Hecox and Jane Doe, by and through her next friends and parents Jean Doe and John Doe (together, the “Plaintiffs”), hereby move to lift the stay in this case for the sole purpose of vacating the protective order (Dkt. 48) that has allowed Jane Doe and her next friends, Jean Doe and John Doe, to proceed under pseudonyms in litigating this matter.

Jane Doe is an 18-year old girl who has determined, with the consultation and approval of her next friends and parents, that she would like to be publicly identified in connection with this lawsuit. Though initially concerned about facing retaliation for her involvement in this case, Jane Doe, who recently turned 18 years old, is now comfortable and intent on her identity being public. Among other things, Jane Doe and her parents believe that it is important for them to support Plaintiff Lindsay Hecox as the public face of this case. They also wish to speak openly about their strong support of transgender inclusion in sports, including through their participation in this case. In particular, Jane Doe wishes to speak publicly, and in connection with this case, about her own experiences of playing sports and supporting all female athletes.

Jean Doe and John Doe were only proceeding under pseudonyms to protect Jane Doe’s anonymity. With Jane Doe’s informed decision to move forward without a pseudonym, her next friends Jean Doe and John Doe similarly request to move forward without anonymity.

Accordingly, for good cause shown, Plaintiffs respectfully request that the Court lift the stay for the sole purpose of vacating the previously granted protective

order (Dkt. 48), and then vacate the protective order. After vacatur, Plaintiffs respectfully request that the current stay be put back in place pending resolution of Defendants' and Intervenors' appeal of this Court's Order granting a preliminary injunction (Dkt. 63).

Counsel for Defendants and Intervenors do not oppose the relief sought herein.

Dated: March 9, 2021

/s/ Richard Eppink

Richard Eppink  
AMERICAN CIVIL LIBERTIES  
UNION OF IDAHO FOUNDATION

Kathleen Hartnett  
Andrew Barr  
COOLEY LLP

Chase Strangio  
James Esseks  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION

Catherine West  
LEGAL VOICE  
*Attorneys for Plaintiffs*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of March, 2021, I filed the foregoing electronically through the CM/ECF system as more fully reflected on the Notice of Electronic Filing:

Bruce D. Skaug ([bruce@skauglaw.com](mailto:bruce@skauglaw.com))  
Raul Labrador ([raul@skauglaw.com](mailto:raul@skauglaw.com))  
Roger G. Brooks ([rbrooks@ADFlegal.org](mailto:rbrooks@ADFlegal.org))  
Kristin Waggoner ([kwaggoner@ADFlegal.org](mailto:kwaggoner@ADFlegal.org))  
Parker Douglas ([pdouglas@ADFlegal.org](mailto:pdouglas@ADFlegal.org))  
Christiana Holcomb ([cholcomb@ADFlegal.org](mailto:cholcomb@ADFlegal.org))  
*Attorneys for Proposed Intervenors*

Matt Wilde ([mattwilde@boisestate.edu](mailto:mattwilde@boisestate.edu))  
*Attorney for BSU and Marlene Tromp*

Eric S. Dreiband ([eric.dreiband@usdoj.gov](mailto:eric.dreiband@usdoj.gov))  
Bart M. Davis ([bart.davis@usdoj.gov](mailto:bart.davis@usdoj.gov))  
Peter L. Wucetich ([peter.wucetich@usdoj.gov](mailto:peter.wucetich@usdoj.gov))  
Matthew J. Donnelly  
([matthew.donnelly@usdoj.gov](mailto:matthew.donnelly@usdoj.gov))  
*Attorneys for United States of America*

Steven L. Olsen  
([steven.olsen@ag.idaho.gov](mailto:steven.olsen@ag.idaho.gov))  
W. Scott Zanzig  
([scott.zanzig@ag.idaho.gov](mailto:scott.zanzig@ag.idaho.gov))  
Dayton P. Reed  
([dayton.reed@ag.idaho.gov](mailto:dayton.reed@ag.idaho.gov))  
*Attorneys for Bradley Little,  
Sherri Ybarra, Individual members  
of the State Board of Education,  
BSU, Marlene Tromp, Individual  
members of the Idaho Code  
Commission*

By: /s/ Richard Eppink