

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

A.C., a minor child, by his next friend, )  
mother and legal guardian, M.C., )

Plaintiff, )

v. )

No. 1:21-cv-2965-TWP-MPB

METROPOLITAN SCHOOL DISTRICT OF )  
MARTINSVILLE; )  
PRINCIPAL, JOHN R. WOODEN MIDDLE )  
SCHOOL, in his official capacity, )

Defendants. )

**Motion for Mother, Legal Guardian, and Next Friend to Proceed by Pseudonym**

M.C., who is the mother of the plaintiff A.C. in this case and who is representing him as his mother, next friend, and legal guardian, files this motion pursuant to Local Rule 10-1 and requests that she be allowed to proceed in this action by her initials as a pseudonym. In support of this motion, she says that:

1. The plaintiff-child in this action is automatically proceeding by his initials pursuant to Federal Rule of Civil Procedure 5.2(a)(3).
2. To protect the privacy and safety of her minor child, who is a transgender male challenging the denial of his right to use male restrooms in his middle school and the failure of the school system to otherwise recognize him as male, she desires to proceed

anonymously as the identity of her child could easily be determined if her actual name was publicly disclosed.

3. In further support of this motion she attaches her declaration and separately files her memorandum of law, both of which are incorporated by reference and set forth her justification for proceeding anonymously.

WHEREFORE, plaintiff's mother, legal guardian, and next friend requests that she be allowed to proceed under the pseudonym of M.C., and for all other proper relief.

Kenneth J. Falk  
Stevie J. Pactor  
ACLU of Indiana  
1031 E. Washington St.  
Indianapolis, IN 46202  
317/635-4059  
fax: 317/635-4105  
kfalk@aclu-in.org  
spactor@aclu-in.org

Attorneys for Plaintiff

**Certificate of Service**

I certify that on this 3rd day of December 2021, a copy of the foregoing was filed electronically with the Clerk of this Court and was served on the below-named parties by first class U.S. Postage, pre-paid.

Metropolitan School District of Martinsville  
Central Education Center  
389 E. Jackson St.  
Martinsville, IN 46151

Principal  
John R. Wooden Middle School  
109 E. Garfield St.  
Martinsville, IN 46151

Kenneth J. Falk  
Attorney at Law

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

A.C., by his next friend, mother and legal	)	
guardian, M.C.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No.
	)	
METROPOLITAN SCHOOL DISTRICT OF	)	
MARTINSVILLE;	)	
PRINCIPAL, JOHN R. WOODEN MIDDLE	)	
SCHOOL, in his official capacity,	)	
	)	
Defendants.	)	

**Declaration of M.C.**

M.C., being duly sworn, says that:

1. I am the mother of A.C., who is currently 12 years old. I am his legal custodian and guardian.
2. A.C. is transgender, and I have filed this case for him as his mother and next friend, seeking to force his school and the school system to treat him as male, which includes allowing him to use male restrooms, allowing him to participate on the boys' soccer team, and requiring that school personnel refer to him by his male name and refer to him using male pronouns.
3. I understand that my son will be known in this case by his initials, but without an order from this Court my actual name will be used in the case.

4. This case concerns the very private matter of my son's gender identity and the process he is going through to be acknowledged by the world to be a boy, and I would like to protect his privacy and safety to the greatest extent possible.

5. I understand that the issues raised in this case, particularly the ability of a transgender student to use the bathrooms appropriate to their gender identity, sometimes provoke hostile responses by members of the public who are opposed to transgender youth being treated in a manner that is consistent with their gender identities.

6. I believe that there are some, if not many, adults in Martinsville who would be opposed to the idea of my son being able to use the boys' bathrooms at this school.

7. My son and I have a different last name. But the John R. Wooden Middle School has less than 700 students. Martinsville is a small community and once my name was known and the fact that my son is in 7th grade at the John R. Wooden Middle School, it would be easy to identify him as the plaintiff in this case.

8. I want to avoid, to the greatest extent possible, anything negative being directed towards my son.

9. I understand that if my request to go by my initials is granted my actual name will be disclosed to opposing counsel when opposing counsel appear in the case. However, to protect my son I would like to be publicly known in this litigation by my initials, M.C.

**Verification**

I verify under penalty of perjury that the foregoing is true and correct.

Executed on: \_\_\_\_\_

ym      c      12/1/2021  
M.C.

Prepared by:

Kenneth J. Falk  
ACLU of Indiana  
1031 E. Washington St.  
Indianapolis, IN 46202



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

A.C., a minor child, by his next friend, )  
mother and legal guardian, M.C., )

Plaintiff, )

v. )

No. 1:21-cv-02965-TWP-MPB

METROPOLITAN SCHOOL DISTRICT OF )  
MARTINSVILLE; )  
PRINCIPAL, JOHN R. WOODEN MIDDLE )  
SCHOOL, in his official capacity, )

Defendants. )

**Order**

M.C., the mother, legal guardian, and next friend of the plaintiff in this case, having filed her motion to proceed by a pseudonym and Notice in compliance with Local Rule 10-1, and the Court being duly advised, finds that good cause exists to grant the motion, and,

IT IS THEREFORE ORDERED that the Motion for Mother, Legal Guardian, and Next Friend to Proceed by Pseudonym is GRANTED, and the mother of the plaintiff shall proceed in this case as M.C. and defendants shall not publicly disclose her true name.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Judge, United States District Court

cc: All ECF-registered counsel of record