

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

**PRIVACY MATTERS**, a voluntary  
unincorporated association; and  
**PARENT A**, president of Privacy  
Matters,

Plaintiffs,

vs.

**UNITED STATES DEPARTMENT  
OF EDUCATION; JOHN B. KING,  
JR.**, in his official capacity as United  
States Secretary of Education; **UNITED  
STATES DEPARTMENT OF  
JUSTICE; LORETTA E. LYNCH**, in  
her official capacity as United States  
Attorney General, and **INDEPENDENT  
SCHOOL DISTRICT NUMBER 706,  
STATE OF MINNESOTA**,

Defendants,

Jane Doe, by and through her mother,  
Sarah Doe,

Proposed Intervenor-  
Defendant.

Case No. 0:16-CV-03015-WMW-LIB

**MOTION TO INTERVENE**

Proposed Intervenor-Defendant Jane Doe, by and through her mother, Sarah Doe, respectfully moves this Court, pursuant to Rule 24 of the Federal Rules of Civil Procedure, for an order permitting Jane to intervene in this action. The basis for Jane's motion is set forth in the accompanying Memorandum of Law and supporting declarations and exhibits filed simultaneously herewith.

Jane further respectfully requests that she be allowed to present oral argument during the November 3, 2016 hearing on her proposed opposition to Plaintiffs' motion for preliminary injunction. Although Jane's status as intervenor may not have been determined by the Court at that time, allowing Jane to present argument on the underlying issues in the preliminary injunction will promote judicial economy and avoid the need for the parties to appear for a second round of arguments on the same motion.

Respectfully submitted this 12th day of October, 2016,

s/Brian W. Thomson

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(pro hac vice motion to be submitted)

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