

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**STUDENTS AND PARENTS FOR
PRIVACY**, a voluntary unincorporated
association; and **VICTORIA WILSON**,

Plaintiffs,

vs.

**SCHOOL DIRECTORS OF
TOWNSHIP HIGH SCHOOL
DISTRICT 211, COUNTY OF COOK
AND STATE OF ILLINOIS**,

Defendants,

and

STUDENTS A, B, AND C, by and
through their parents and legal
guardians **Parents A, B, and C**, and
the **ILLINOIS SAFE SCHOOLS
ALLIANCE**,

Intervenor-Defendants.

Case No. 1:16-cv-04945

The Honorable Jorge L. Alonso

**INTERVENOR-DEFENDANTS’ MOTION TO DISMISS THE FIRST AMENDED
COMPLAINT**

Intervenor-Defendants, Students A, B, and C, Parents A, B, and C, and the Illinois Safe Schools Alliance (“Intervenor-Defendants”) hereby move under Fed. R. Civ. P. 12(b)(6) to dismiss the First Amended Complaint for failure to state a claim upon which relief can be granted. Plaintiffs’ claims in the First Amended Complaint are each legally baseless under recent and controlling Circuit and Supreme Court precedent, and accordingly Plaintiffs’ Amended Complaint should be dismissed in its entirety.

In support of this motion, Intervenor-Defendants incorporate by reference the memorandum of law filed concurrently herewith, any reply memorandum that Intervenor-Defendants may file, and any oral argument the Court may allow at a hearing on this motion.

Respectfully submitted,

Dated: April 2, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois by using the CM/ECF system. I certify that all participants in the case are registered MC/ECF users and that service will be accomplished by the CM/ECF system.

By: /s/ Britt M. Miller