

JUN 02 2011

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Georgia Latino Alliance for Human
Rights, et al.,

Plaintiffs,

v.

Governor Nathan Deal, et al.,

Defendants.

Case No. 1:11-CV-1804

**DOE PLAINTIFFS' MOTION FOR LEAVE TO PROCEED UNDER
PSEUDONYMS**


Plaintiffs Jane Doe #1, Jane Doe #2, John Doe #1, and John Doe #2 (collectively, "Doe Plaintiffs"), by and through undersigned counsel, respectfully seek leave to proceed under pseudonyms in this action. This motion is supported by (i) a Memorandum of Law and (ii) Declarations of Jesse Benjamin, Martha W. Rees, and Naomi R. Tsu, all of which are filed concurrently herewith. The motion is also supported by declarations of each of the Doe Plaintiffs; counsel will shortly file a motion pursuant to Local Rule 79.1(C)(2) requesting permission to file those declarations under seal, and will file them promptly upon receipt of an order from the Court authorizing them to do so under seal.

All four Doe Plaintiffs should be permitted to pursue this litigation under pseudonyms. As detailed in Plaintiffs' Memorandum of Law, if the Doe Plaintiffs' identities and participation in this lawsuit were to become public, there would be an increased risk that they or their family members would be subjected to unconstitutional detention by the police, the initiation of removal proceedings or other adverse immigration consequences, and public hostility, harassment, and even violence.

For these and other reasons, the Doe Plaintiffs respectfully request that this Court grant their motion to proceed under pseudonyms.

Dated: June 2, 2011

Respectfully submitted,*



Naomi Tsu

On behalf of Attorneys for Plaintiffs

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* Counsel certifies this document has been prepared in accordance with L.R. 5.1.

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* Application for admission *pro hac vice* forthcoming