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**UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF UTAH  
 CENTRAL DIVISION**

Utah Coalition of La Raza, *et al.*,

Plaintiffs,

v.

Gary R. Herbert, *et al.*,

Defendants.

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

Case No. 2:11-cv-00401-BCW

Judge: Brooke C. Wells

Plaintiffs Jane Doe #1, John Doe #1, and John Doe #2 (collectively, “Doe Plaintiffs”), by and through counsel, respectfully seek leave to proceed under pseudonyms in this action. This motion is supported by (i) a Memorandum of Points and Authorities and (ii) Declarations of Darcy Goddard, Theresa Martinez, and Octavio Villalpando, 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 under DUCiv R 5-2(a) requesting permission to file those declarations under seal, and will file them promptly on receipt of an order from the Court authorizing them to do so under seal.

All three Doe Plaintiffs should be permitted to pursue this litigation under pseudonyms. As detailed in Plaintiffs’ Memorandum of Points and Authorities, 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: May 4, 2011

Respectfully submitted,

/s/ Katherine Desormeau  
AMERICAN CIVIL LIBERTIES UNION  
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