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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

"VICKY;" "JANE DOE" as next friend for
"SKYLAR" and "SAVANNAH," minors;
"JOHN DOE" as next friend for "SALLY"
and "SIERRA," minors; "JANE ROE" as
next friend for "PIA," "MYA," and "AVA,"
minors; "ALICE;" "SARAH;" "MAUREEN;"
"CASSEOPIA;" "AMY;" "JESSICA;" "JOHN
ROE" as next of friend for "JANE;" "JANE
SMITH" as next of friend for "ERIKA" and
"TORI;" "JENNY;" and "ANDY,"

Plaintiff,

v.

James Graham Usherwood,

Defendant.

NO. 17-cv-01604-RSL

MOTION AND ORDER FOR
PLAINTIFFS TO PROCEED WITH
PSEUDONYMS

NOTE ON MOTION CALENDAR:

I. STATEMENT OF RELIEF REQUESTED

"Vicky," minors "Skylar" and "Savannah" proceeding by and through their next friend,
Jane Doe, minors "Sally," and "Sierra" proceeding by and through their next friend

MOTION AND ORDER TO PROCEED
WITH PSEUDONYM - 1

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1 John Doe, minors "Pia," "Mya," and "Ava" proceeding by and through their next friend
2 Jane Roe, "Alice," "Sarah," "Maureen," "Casseopia," "Amy," "Jessica," minor "Jane" by
3 and through her next friend, John Roe, minors "Erika" and "Tori" proceeding by and
4 through their next friend, Jane Smith, "Jenny," and "Andy" proceeding by and through
5 their attorneys Carol L. Hepburn and J. William Savage of Carol L. Hepburn, P.S.
6 move this court for an order allowing him or her to proceed in this matter using a
7 pseudonym.
8

9 II. FACTS RELEVANT TO MOTION

10 As set forth in the complaint herein, each of the Plaintiffs herein were
11 forced from a young age to have sexual encounters, including digital and penile
12 penetration and oral copulation, with an adult male for the purposes of producing
13 images and videos of child pornography. Images and videos of each in the plaintiffs in
14 the course of being sexually abused as children has been circulated on the Internet.

15 The images and videos of the sexual abuse of each of the Plaintiffs herein have
16 been distributed and circulated on the Internet and are known by consumers and
17 traffickers of child pornography as their individual series name of child pornography
18 images. These images and videos constitute child pornography within the meaning of
19 U.S.C. § 2256(8).

20 Each of the Plaintiffs herein have been and will continue to be severely harmed
21 by the distribution and possession by others of the images of their child sexual abuse.
22 The permanent harm these children have approximately suffered includes but is not
23 limited to extreme and permanent emotional distress with physical manifestation,
24 interference with each of their normal development and educational progress, lifelong
25

1 loss of income earning capacity, loss of past and future wages, past and future
2 expenses for medical and psychological treatment, loss of enjoyment of life, and other
3 losses.

4 The matter before the court comes on Plaintiffs' claim for civil damages against
5 one of the criminal defendants who has been convicted of possessing depictions of
6 minors engaged in sexually explicit conduct, including image(s) of each of the
7 plaintiffs. These image(s), which form the basis of the claim herein, are highly
8 personal, intimate, and humiliating to each of the plaintiffs.

9 The Plaintiffs fear that individuals may stalk him or her, with the intent to do
10 harm. The knowledge of the circulation of his or her image(s) has destroyed his or her
11 sense safety. The knowledge of his or her image(s) being on the Internet has had a
12 debilitating effect on his or her ability to be present in public places. Stalking is a very
13 real danger for victims such as the Plaintiffs. "Vicky" has been stalked online and in
14 real life by child pornography enthusiast who included a man later convicted of stalking
15 who proposed to make more videos with "Vicky." Revelation of his or her legal name
16 would force the Plaintiffs to experience humiliation and fear of retaliation.

17
18 Plaintiffs make this request in order to proceed with pseudonyms captioned
19 herein. Defendant, through counsel, has agreed to entry of this order.

20
21
22 **ORDER**

23 THIS MATTER, having come before the Court on the Plaintiffs' motion to
24 proceed with pseudonym;
25

MOTION AND ORDER TO PROCEED
WITH PSEUDONYM - 3

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1 It is so ordered .

2
3 Dated this 14th of November, 2017.

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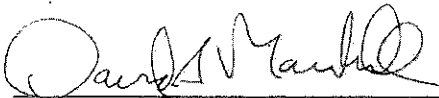
6 Robert S. Lasnik
7 United States District Judge

8 Presented by:

9
10 By: /s Carol L. Hepburn
11 Carol L. Hepburn, WSBA No. 8732
12 J. William Savage, WSBA No. 32148
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jwsavage@earlink.net
19 Of attorneys for Plaintiffs

20 Stipulated to and Notice of Presentation Waived

21 By:

22 

23 David S. Marshall
24 MARSHALL DEFENSE FIRM
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MOTION AND ORDER TO PROCEED
WITH PSEUDONYM - 4

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