

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

Parents, Families, and Friends of Lesbians)
and Gays, Inc.; et al.,)
)
Plaintiffs,)
)
v.) Case No. 2:11-cv-04212-NKL
)
Camdenton R-III School District, et al.,)
)
Defendants.)

MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

COME NOW Plaintiffs, pursuant to FED.R.CIV.P. 15(a), and move this Court to grant them leave to file a second amended complaint in this action. In support of their motion, Plaintiffs state:

1. Plaintiffs request leave to file a second amended complaint to add allegations related to a putative class of students.
2. This Court’s scheduling order provides, “Any motion to amend the pleadings will be filed on or before November 1, 2011.” (Doc. # 46).
3. Defendants will not be unfairly prejudiced by permitting Plaintiffs to file a second amended complaint.
4. A copy of Plaintiffs’ proposed amended complaint is attached as an exhibit.

WHEREFORE Plaintiffs respectfully request leave of Court to file their proposed second amended complaint.

Respectfully Submitted,

By _____ /s/ Anthony E. Rothert

Mark Sableman #36276
A. Elizabeth Blackwell #50270

THOMPSON COBURN LLP
One U.S. Bank Plaza
St. Louis, Missouri 63101
314-552-6000
FAX 314-552-7000

msableman@thompsoncoburn.com
eblackwell@thompsoncoburn.com

Anthony E. Rothert, # 44827
Grant R. Doty, # 60788
American Civil Liberties Union of Eastern Missouri

454 Whittier Street
St. Louis, Missouri 63108
314-652-3114
FAX 314-652-3112

tony@aclu-em.org
grant@aclu-em.org

Joshua A. Block
Leslie Cooper
James Esseks
LGBT Project
ACLU Foundation
125 Broad Street, Floor 18
New York, New York 10004
(212) 549-2600
FAX 212-549-2650

jblock@aclu.org
lcooper@aclu.org
jesseks@aclu.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Thomas A. Mickes
Betsey A. Helfrich
MICKES GOLDMAN O'TOOLE, LLC
555 Maryville University Drive
Suite 240
St. Louis, Missouri 63141

*Attorneys for Defendants
Camdenton R-III School District
and Timothy E. Hadfield*

/s/ Anthony E. Rothert