

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

GLBT YOUTH IN IOWA SCHOOLS TASK
FORCE d/b/a/ IOWA SAFE SCHOOLS, et al.,

Plaintiffs,

v.

KIM REYNOLDS, in her official capacity as
Governor of the State of Iowa, et al.,

Defendants.

Case No. 4:23-cv-474

**[PROPOSED] PROTECTIVE
ORDER AUTHORIZING
MOVANTS TO PROCEED
UNDER PSEUDONYMS**

This matter is before the Court on a Motion for Leave to Proceed Under Pseudonyms and for a Protective Order (the “Motion”) brought by Plaintiff Robert Smith, by his parents and next friends John and Jane Smith, and Plaintiff James Doe, by his parent and next friend John Doe (collectively, the “Movants”). Having considered the Movants’ Motion, Movants’ Brief in Support, and the record in this case, and having otherwise been fully advised, the Court finds there is good cause to grant Movants’ Motion and hereby ORDERS as follows:

1. Movants may proceed in this action under the pseudonyms “Robert Smith,” “John Smith,” “Jane Smith,” “James Doe,” and “John Doe.”
2. Movants’ counsel shall disclose Movants’ true names and, to the extent otherwise discoverable under the Federal Rules of Civil Procedure, other information that identifies Movants or Movants’ family members, directly or indirectly (“Identifying Information”), upon request to Defendants’ counsel and the Court.
3. All publicly filed documents shall identify Movants only by Movants’ pseudonyms.

4. All documents filed with the Court that contain a Movant's name or other Identifying Information shall be redacted.

5. Defendants' counsel, to the minimum extent necessary to litigate this action, may disclose a Movant's name or other Identifying Information to Defendants, Defendants' employees, and experts retained in this action. Defendants' counsel shall take care to disclose such information only to those individuals among Defendants, Defendants' employees, and experts, with a need to know the information for purposes of litigating this action.

6. Individuals to whom a Movant's name or other Identifying Information is disclosed shall not use such information for any purpose unrelated to Defendants' litigation of this action and shall not further disclose such information to any other person without first obtaining written confirmation from Movants' counsel that such disclosure is necessary to litigate this action.

7. Under no circumstances shall any person disclose a Movant's name or Identifying Information to a member of the media without the express written consent of Movants' counsel.

8. Before disclosing Movant's name or Identifying Information to any person for purposes of litigation this action, Defendants' counsel shall give that person a copy of this Order, require that person to read this Order, specifically advise that person of the provisions of sections six and seven of this Order, and specifically warn that person that violation of this Order may result in sanctions, including being held in contempt of this Court.

9. If any dispute or disagreement arises between the parties related to compliance with this Order or the non-disclosure of Movants' names and Identifying Information, the parties shall, in good faith, seek to resolve such disputes or disagreements without Court intervention. Only after such good faith attempts at resolution fail may the parties seek further clarification from this Court.

10. No part of the restrictions imposed by this Protective Order may be terminated except by written stipulation of the parties or by other order of this Court for good cause shown. The final disposition of this litigation shall not relieve any person who has received a Movant's name or Identifying Information from the obligations imposed by this Order.