

**CLAIMS REGARDING DISCRIMINATION AGAINST THE GAY-
STRAIGHT ALLIANCE**

COUNT I

**Discrimination Against the Gay-Straight Alliance in Violation of the Equal
Access Act**

**(All Plaintiffs against Defendants White County School District, Paul Shaw,
Bryan Dorsey, and Sandy Bales)**

93.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

94.

The Equal Access Act mandates that, where a public secondary school that receives federal financial assistance permits even one non-curricular student group to meet on campus during non-instructional time, it must permit all other non-curricular student groups to do so, too, and to do so on equal terms.

95.

WCHS is a public secondary school that receives federal financial assistance that permits non-curricular student groups to meet on campus during non-instructional time.

96.

Defendants have not permitted and continue not to permit the Club to meet on campus during non-instructional time on terms equal to those on which other non-curricular student groups meet because the content of its speech.

97.

Because Defendants have not permitted and continue not to permit the Club to meet on campus during non-instructional time on terms equal to those on which other non-curricular student groups to meet because of the content of its speech, they have violated and continue to violate the Equal Access Act.

98.

As a direct and proximate result of Defendants' actions, Plaintiffs have been denied and continue to be denied the opportunity to meet in order to discuss and learn about matters, and engage in activities, relevant to LGBT students and their heterosexual supporters, including what the harmful effects of anti-gay discrimination are and how to make schools physically and emotionally safe for gay teenagers. Plaintiffs have also suffered and continue to suffer stigmatic harm on account of being the discriminatory treatment of their viewpoint. Plaintiffs seek nominal damages and the declaratory and injunctive relief as set forth in the prayer for relief.

COUNT II

Discrimination Against the Gay-Straight Alliance in Violation of the First and Fourteenth Amendment to the United States Constitution

(All Plaintiffs against Defendants White County School District, Paul Shaw, Bryan Dorsey, and Sandy Bales)

99.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

100.

The Free Speech Clause of the First Amendment to the United States Constitution prohibits a government actor from denying access to a limited public forum to a speaker, including an expressive association, based on its viewpoint.

101.

Defendants are government actors who have opened a limited public forum to expressive associations by permitting non-curricular students to meet on campus during non-instructional time.

102.

Defendants have not permitted and continue not to permit the Club to meet on terms equal to those on which other non-curricular student groups meet because of its viewpoint.

103.

Because Defendants have denied and continue to deny the Club access to their limited public forum based on its viewpoint, Defendants have impermissibly deprived and continue to deprive Plaintiffs of their right to expressive association guaranteed to them by the First and Fourteenth Amendments to the United States Constitution.

104.

As a direct and proximate result of Defendants' actions, Plaintiffs have been denied and continue to be denied the opportunity to meet in order to discuss and learn about matters, and engage in activities, relevant to LGBT students and their heterosexual supporters, including what the harmful effects of anti-gay discrimination are and how to make schools physically and emotionally safe for gay teenagers. Plaintiffs have also suffered and continue to suffer stigmatic harm on account of being the discriminatory treatment of their

viewpoint. Plaintiffs seek nominal damages and the declaratory and injunctive relief as set forth in the prayer for relief.

COUNT III

Discrimination Against The Gay-Straight Alliance in Violation of the Article I, Section I, Paragraph V of the Georgia Constitution

(All Plaintiffs against Defendants White County School District, Paul Shaw, Bryan Dorsey, and Sandy Bales)

105.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

106.

Article I, Section 1, Paragraph V of the Georgia Constitution prohibits a government actor from denying access to a limited public forum to a speaker, including an expressive association, based on its viewpoint.

107.

Defendants are government actors who have opened a limited public forum to expressive associations by permitting non-curricular student groups to meet on campus during non-instructional time.

108.

Defendants have not permitted and continue not to permit the Club to meet on terms equal to those on which other non-curricular student groups meet because of its viewpoint.

109.

Because Defendants have denied and continue to deny the Club access to their limited public forum based on its viewpoint, they have impermissibly deprived, and continue to deprive, Plaintiffs of their right to expressive association guaranteed to them by Article I, Section 1, Paragraph V of the Georgia Constitution.

110.

As a direct and proximate result of Defendants' actions, Plaintiffs have been denied and continue to be denied the opportunity to meet in order to discuss and learn about matters, and engage in activities, relevant to LGBT students and their heterosexual supporters, including what the harmful effects of anti-gay discrimination are and how to make schools physically and emotionally safe for gay teenagers. Plaintiffs have also suffered and continue to suffer stigmatic harm on account of being the discriminatory treatment of their

viewpoint. Plaintiffs seek nominal damages and the declaratory and injunctive relief as set forth in the prayer for relief.

CLAIMS REGARDING DELIBERATE INDIFFERENCE TO HARASSMENT OF, AND DISCRIMINATION AGAINST, GAY, LESBIAN, AND BISEXUAL STUDENTS

COUNT IV

Deliberate Indifference to Harassment of, and Discrimination Against, Gay, Lesbian, and Bisexual Students in Violation of the Right to Equal Protection Guaranteed by the Fourteenth Amendment to the United States Constitution

(Plaintiffs White County High School Peers Rising in Diverse Education, on behalf of its members, Kerry Pacer, Charlene Hammersen, and Kimberlee Gould against Defendants White County School District, Paul Shaw, Bryan Dorsey, and Sandy Bales)

111.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

112.

The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution prohibits a government actor from discriminating against a class without a constitutionally sufficient justification.

113.

Deliberate indifference of a public school district and public school district officials to severe and pervasive harassment of a class of students is a form of invidious discrimination against a class without a constitutionally sufficient justification.

114.

Plaintiffs and other gay students at WCHS and throughout WCSD have suffered and continue to suffer severe and pervasive harassment and discrimination at the hands of their peers and even their teachers because of their sexual orientation, to which Defendants have been and continue to be deliberately indifferent. Defendants do not allow heterosexual students to suffer severe and pervasive harassment and discrimination. Defendants are not indifferent to the harassment and abuse of students who are not, or are not perceived to be, gay, lesbian or bisexual.

115.

Because Defendants have been and continue to be deliberately indifferent to severe and pervasive harassment of gay students because of their sexual orientation, they have deprived and continue to deprive Plaintiffs of their right to equal protection guaranteed to them by the Fourteenth Amendment.

116.

Defendants have engaged and continue to engage in this course of conduct with reckless disregard for Plaintiffs' constitutional rights.

117.

As the direct and proximate result of Defendants' actions, Plaintiffs have suffered and will continue to suffer pain, suffering, consternation and emotional distress as a result of the deprivation of their rights under the Fourteenth Amendment. Plaintiffs seek compensatory and punitive damages and the declaratory and injunctive relief set forth in the prayer for relief.

COUNT V

Deliberate Indifference to Harassment of, and Discrimination Against, Gay, Lesbian, and Bisexual Students in Violation of the Right to Equal Protection Guaranteed by Article I, Section I, Paragraph II of the Georgia Constitution

(Plaintiffs White County High School Peers Rising in Diverse Education, on behalf of its members, Kerry Pacer, Charlene Hammersen, and Kimberlee Gould against Defendants White County School District, Paul Shaw, Bryan Dorsey, and Sandy Bales)

118.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

119.

Article I, Section 1, Paragraph II of the Georgia Constitution prohibits a government actor from discriminating against a class without a constitutionally sufficient justification.

120.

Deliberate indifference of a public school district and public school district officials to severe and pervasive harassment of a class of students is a form of invidious discrimination against a class without a constitutionally sufficient justification.

121.

Plaintiffs and other gay students at WCHS and throughout WCSD have suffered and continue to suffer severe and pervasive harassment and discrimination at the hands of their peers and even their teachers because of their sexual orientation, to which Defendants have been and continue to be deliberately indifferent. Defendants do not allow heterosexual students to suffer severe and pervasive harassment and discrimination. Defendants are not indifferent to the harassment and abuse of students who are not, or are not perceived to be, gay, lesbian or bisexual.

122.

Because Defendants have been and continue to be deliberately indifferent to severe and pervasive harassment of gay students because of their sexual orientation, they have deprived and continue to deprive Plaintiffs of their right to equal protection guaranteed to them by Article I, Section 1, Paragraph II.

123.

Defendants have engaged and continue to engage in this course of conduct with reckless disregard for Plaintiffs' constitutional rights.

124.

As the direct and proximate result of Defendants' actions, Plaintiffs have suffered and will continue to suffer pain, suffering, consternation and emotional distress as a result of the deprivation of their rights under Article I, Section 1, Paragraph II. Plaintiffs seek compensatory and punitive damages and the declaratory and injunctive relief set forth in the prayer for relief.

CLAIMS REGARDING OTHER CENSORSHIP OF STUDENT SPEECH

COUNT VI

Facial Overbreadth And Vagueness Of Dress Code Policies in Violation of the First and Fourteenth Amendments to the United States Constitution

(All Plaintiffs against all Defendants)

125.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

126.

The Free Speech Clause of the First Amendment to the United States Constitution prohibits censorship of student speech by a public school district of public school officials if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others.

127.

Defendants' dress code policies purport to permit them to censor messages on clothing that are "unacceptable by community standards" or are "offensive."

128.

Because Defendants' dress code policies purport to permit them to censor messages on clothing even if the student speech does not substantially disrupt

the school environment or substantially interfere with the rights of others, they are facially overbroad and vague in violation of the First and Fourteenth Amendments.

129.

As the direct and proximate result of Defendants' dress code policies, Plaintiffs have suffered, and continue to suffer, the chilling of their right to free expression and seek nominal damages and the declaratory and injunctive relief set forth in the prayer for relief.

COUNT VII

Facial Overbreadth and Vagueness of Dress Code Policies in Violation of Article I, Section I, Paragraph V of the Georgia Constitution

(All Plaintiffs against all Defendants)

130.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

131.

Article I, Section 1, Paragraph V of the Georgia Constitution prohibits censorship of student speech by a public school district or public school officials if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others.

132.

Defendants' dress code policies purport to permit them to censor messages on clothing that are "unacceptable by community standards" or are "offensive."

133.

Because Defendants' dress code policies purport to permit them to censor messages on clothing even if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others, they are facially overbroad and vague in violation of Article I, Section 1, Paragraph V.

134.

As the direct and proximate result of Defendants' dress code policies, Plaintiffs have suffered, and continue to suffer, the chilling of their right to free expression and seek nominal damages and the declaratory and injunctive relief set forth in the prayer for relief.

COUNT VIII

Application of Dress Code Policies in Violation of the First and Fourteenth Amendments to the United States Constitution

(Plaintiffs Kerry Pacer and Lindsay Pacer against all Defendants)

135.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

136.

The Free Speech Clause of the First Amendment to the United States Constitution prohibits censorship of student speech by a public school district of public school officials if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others.

137.

Defendants have censored and continue to censor Plaintiffs' t-shirts even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing.

138.

Because Defendants have censored and continue to censor Plaintiffs' t-shirts even though they did not substantially disrupt the school environment or

substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing, Defendants have deprived and continue to deprive Plaintiffs of their rights under the First and Fourteenth Amendments.

139.

As the direct and proximate result of Defendants' actions, Plaintiffs have suffered and will continue to suffer the chilling of their right to free expression. Plaintiffs seek nominal damages and the declaratory relief set forth in their prayer for relief.

COUNT IX

Application of Dress Code Policies in Violation of Article I, Section I, Paragraph V of the Georgia Constitution

(Plaintiffs Kerry Pacer and Lindsay Pacer against all Defendants)

140.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

141.

Article I, Section I, Paragraph V of the Georgia Constitution prohibits censorship of student speech by a public school district or public school officials if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others.

142.

Defendants have censored and continue to censor Plaintiffs' t-shirts even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing.

143.

Because Defendants have censored and continue to censor Plaintiffs' t-shirts even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing, Defendants have deprived and continue to deprive Plaintiffs of their rights under Article I, Section 1, Paragraph V.

144.

As the direct and proximate result of Defendants' actions, Plaintiffs have suffered and will continue to suffer the chilling of their right to free expression. Plaintiffs seek nominal damages and the declaratory and injunctive relief set forth in their prayer for relief.

COUNT X

Other Censorship of and Retaliation Against Student Speech in Violation of the First and Fourteenth Amendments to the United States Constitution

(Plaintiffs White County High School Peers Rising in Diverse Education, on behalf of itself and its members, Kerry Pacer, and Charlene Hammersen against Defendants White County School District, Paul Shaw, Bryan Dorsey and Sandy Bales)

145.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

146.

The Free Speech Clause of the First Amendment to the United States Constitution prohibits censorship of student speech by a public school district of public school officials if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others.

147.

Defendants have censored and continue to censor Plaintiff Hammersen's flag and sign even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing.

148.

Because Defendants have censored and continue to censor Plaintiff Hammersen's flag and sign even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing, and have retaliated against her because of her speech, Defendants have deprived and continue to deprive Plaintiff of her rights under the First and Fourteenth Amendments.

149.

Defendants have prevented Plaintiffs from distributing anti-bullying cards and other information, even though the information did not substantially disrupt the school environment or substantially interfere with the rights of others, and was not obscene, lewd, threatening, or harassing.

150.

Because Defendants have censored and continue to censor Plaintiffs' anti-bullying cards and other information even though the information did not substantially disrupt the school environment or substantially interfere with the rights of others, and was not obscene, lewd, threatening, or harassing, Defendants have deprived and continue to deprive Plaintiffs of their rights under the First and Fourteenth Amendments.

151.

As the direct and proximate result of Defendants' actions, Plaintiffs have suffered, and will continue to suffer, the chilling of their right to free expression. Plaintiffs seek nominal damages and the declaratory and injunctive relief set forth in their prayer for relief.

COUNT XI

Other Censorship of and Retaliation Against Student Speech in Violation of Article I, Section I, Paragraph V of the Georgia Constitution

(Plaintiffs White County High School Peers Rising in Diverse Education, on behalf of itself and its members, Kerry Pacer, and Charlene Hammersen against Defendants White County School District, Paul Shaw, Bryan Dorsey and Sandy Bales)

152.

Plaintiffs restate, as if rewritten here in their entirety, each and every claim and allegation set forth in this Complaint.

153.

Article I, Section 1, Paragraph V of the Georgia Constitution prohibits censorship of student speech by a public school district or public school officials if the student speech does not substantially disrupt the school environment or substantially interfere with the rights of others.

153.

Defendants have censored and continue to censor Plaintiff Hammersen's flag and sign even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing.

154.

Because Defendants have censored and continue to censor Plaintiff Hammersen's flag and sign even though they did not substantially disrupt the school environment or substantially interfere with the rights of others, and were not obscene, lewd, threatening, or harassing, and have retaliated against her because of her speech, Defendants have deprived and continue to deprive Plaintiff of her rights under Article I, Section 1, Paragraph 5.

155.

Defendants have prevented Plaintiffs from distributing information in the form of anti-bullying cards and other information, even though the information did not substantially disrupt the school environment or substantially interfere with the rights of others, and was not obscene, lewd, threatening, or harassing.

156.

Because Defendants have censored and continue to censor Plaintiff's anti-bullying cards and other information even though the information did not substantially disrupt the school environment or substantially interfere with the rights of others, and was not obscene, lewd, threatening, or harassing, Defendants have deprived and continue to deprive Plaintiffs of their rights under Article I, Section 1, Paragraph V.

157.

As the direct and proximate result of Defendants' actions, Plaintiffs have suffered, and will continue to suffer, the chilling of their right to free expression. Plaintiffs seek nominal damages and the declaratory relief set forth in their prayer for relief.

PRAYER

WHEREFORE, having fully stated their claims against Defendants, these complaining Plaintiffs demand entry of judgment for Plaintiffs and against Defendants on all Counts, and relief on all Counts as follows:

(1) On Counts I, II, and III:

(a) A declaration that Defendants' discrimination against

Plaintiff White County High School Peers Rising in Diverse Education

and its members, including Plaintiffs Kerry Pacer, Lindsay Pacer, Charlene Hammersen, and Kimberlee Gould, is a violation of the Equal Access Act and the rights of expressive association guaranteed by the United States and Georgia Constitutions;

(b) An injunction ordering Defendants (i) to recognize Plaintiff White County High School Peers Rising in Diverse Education as a non-curricular club, (ii) to permit Plaintiff White County High School Peers Rising in Diverse Education to meet, at a minimum, on terms equal to those on which any other non-curricular student group has met during the 2005/2006 school year, including enjoyment of school privileges (e.g., use of the school public address system, school bulletin boards, or the school website to publicize meetings), and (iv) not to retaliate against Plaintiff White County High School Peers Rising in Diverse Education or its members, including Plaintiffs Kerry Pacer, Lindsay Pacer, Charlene Hammersen, and Kimberlee Gould; and

(c) Nominal damages; and

(2) On Counts IV and V:

(a) A declaration that Defendants' deliberate indifference to the harassment of and discrimination against Plaintiffs Kerry Pacer, Charlene

Hammersen, and Kimberlee Gould and members of Plaintiff White County Peers Rising in Diverse Education is a violation of the rights to equal protection guaranteed by the United States and Georgia Constitutions;

(b) An injunction ordering Defendants (i) to take all action necessary to ensure, within reason, that such harassment and discrimination and such deliberate indifference to such harassment and discrimination cease, (ii) to expunge the disciplinary records of Plaintiffs Kerry Pacer, Charlene Hammersen, and Kimberlee Gould and members of Plaintiff White County Peers Rising in Diverse Education with respect to disciplinary action taken in response to the reporting of incidents of harassment or discrimination, and (iii) not to retaliate against Plaintiffs Kerry Pacer, Charlene Hammersen, or Kimberlee Gould or Plaintiff White County Peers Rising in Diverse Education or its members; and

(c) Compensatory and punitive damages; and

(3) On Counts VI and VII:

(a) A declaration that the portion of Defendants' dress code policies that prohibits dress that is "unacceptable by community standards" or "offensive" is facially overbroad and vague in violation of

the rights to free speech guaranteed by the United States and Georgia Constitutions;

(b) An injunction prohibiting the enforcement of the portion of Defendants' dress code policies that prohibits dress that is "unacceptable by community standards" or "offensive," and any retaliation against Plaintiffs; and

(c) Nominal damages; and

(4) On Counts VIII and IX:

(a) A declaration that the application of Defendants' dress code policies to the t-shirts of Plaintiffs Kerry Pacer and Lindsay Pacer is a violation of the rights to free speech guaranteed by the United States and Georgia Constitutions;

(b) An injunction ordering Defendants (i) to permit Plaintiffs Kerry Pacer and Lindsay Pacer to wear their t-shirts during school, (ii) to expunge the disciplinary records of Plaintiffs Kerry Pacer and Lindsay Pacer with respect to disciplinary action taken in response to the wearing of the t-shirts, and (iii) not to retaliate against Plaintiffs Kerry Pacer and Lindsay Pacer; and

(c) Nominal damages; and

(5) On Counts X and XI:

(a) A declaration that Defendants' censorship of and retaliation against the speech of Plaintiff White County High School Peers Rising in Diverse Education and its members, including Plaintiff Kerry Pacer, and Plaintiff Charlene Hammersen are violations of the rights to free speech guaranteed by the United States and Georgia Constitutions;

(b) An injunction ordering Defendants (i) to permit Plaintiff Charlene Hammersen to display her flag and sign on school property; (ii) to expunge the disciplinary records of Plaintiff Charlene Hammersen with respect to disciplinary action taken in response to the displaying of the flag and sign, (iii) to permit Plaintiff White County High School Peers Rising in Diverse Education and its members, including Plaintiff Kerry Pacer, to distribute anti-bullying cards and similar information to other students during non-instructional time; and (iv) not to retaliate against Plaintiff White County High School Peers Rising in Diverse Education and its members, including Plaintiff Kerry Pacer, and Plaintiff Charlene Hammersen; and

(c) Nominal damages; and

(6) On all Counts:

(a) An award of fees and costs pursuant to 42 U.S.C. § 1988 and/or Fed. R. Civ. P. 54(d), and/or as otherwise provided by law; and

(b) Such further relief as the Court may deem just and proper.

Dated: February 27, 2006.

Respectfully submitted,



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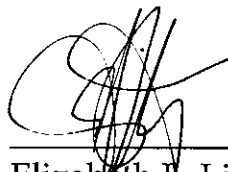
Cooperating Counsel for
American Civil Liberties Union Foundation
of Georgia

Counsel for Plaintiffs.

CERTIFICATE OF COMPLIANCE

I hereby certify that this brief was prepared in accordance with LR 5.1(B).

It is presented in Book Antigua, 13 pitch.

A handwritten signature in black ink, appearing to be 'EL', is written above a horizontal line.

Elizabeth L. Littrell, GA Bar No. 454949

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

WHITE COUNTY HIGH SCHOOL PEERS
RISING IN DIVERSE EDUCATION, et al.,

Plaintiffs,

v.

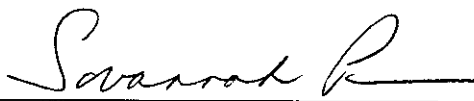
WHITE COUNTY SCHOOL DISTRICT,
d/b/a WHITE COUNTY PUBLIC SCHOOLS,
et al.,

Defendants.

Civil Action File
No. _____

VERIFICATION

I swear and affirm that t the information contained in the paragraphs of the
Complaint about which I have personal knowledge and are true and correct.


Savannah Pacer

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

WHITE COUNTY HIGH SCHOOL PEERS
RISING IN DIVERSE EDUCATION, et al.,

Plaintiffs,

v.

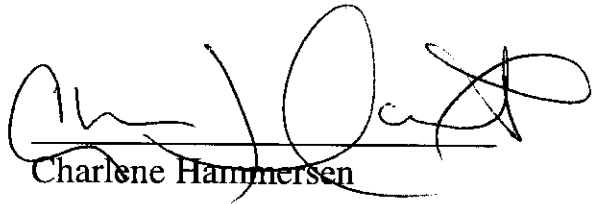
WHITE COUNTY SCHOOL DISTRICT,
d/b/a WHITE COUNTY PUBLIC SCHOOLS,
et al.,

Defendants.

Civil Action File
No. _____

VERIFICATION

I swear and affirm that t the information contained in the paragraphs of the
Complaint about which I have personal knowledge and are true and correct.


Charlene Hammersen

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

WHITE COUNTY HIGH SCHOOL PEERS
RISING IN DIVERSE EDUCATION, et al.,

Plaintiffs,

v.

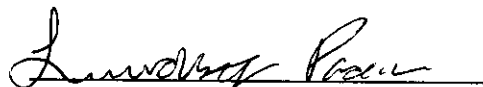
WHITE COUNTY SCHOOL DISTRICT,
d/b/a WHITE COUNTY PUBLIC SCHOOLS,
et al.,

Defendants.

Civil Action File
No. _____

VERIFICATION

I swear and affirm that t the information contained in the paragraphs of the
Complaint about which I have personal knowledge and are true and correct.


Lindsay Pacer

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

WHITE COUNTY HIGH SCHOOL PEERS
RISING IN DIVERSE EDUCATION, et al.,

Plaintiffs,

v.

WHITE COUNTY SCHOOL DISTRICT,
d/b/a WHITE COUNTY PUBLIC SCHOOLS,
et al.,

Defendants.

Civil Action File
No. _____

VERIFICATION

I swear and affirm that t the information contained in the paragraphs of the
Complaint about which I have personal knowledge and are true and correct.

Kimberlee Gould
Kimberlee Gould

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

WHITE COUNTY HIGH SCHOOL PEERS
RISING IN DIVERSE EDUCATION, et al.,

Plaintiffs,

v.


WHITE COUNTY SCHOOL DISTRICT,
d/b/a WHITE COUNTY PUBLIC SCHOOLS,
et al.,

Defendants.

Civil Action File
No. _____

VERIFICATION

I swear and affirm that t the information contained in the paragraphs of the
Complaint about which I have personal knowledge and are true and correct.


Kerry Pacet