

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:21-cv-00704-WJM-SKC

A.V., a child, through his mother and next friend, MICHELLE HANSON;

Plaintiff,

v.

DOUGLAS COUNTY SCHOOL DISTRICT RE-1;  
TONY SPURLOCK, the Douglas County Sheriff, in his official capacity;  
SIDNEY NICHOLSON, a Douglas County School Resource Officer, in his individual capacity;  
LYLE PETERSON, a Douglas County School Resource Officer, in his individual capacity;  
DANIEL COYLE, a Douglas County School Resource Officer, in his individual capacity,

Defendants.

---

**NOTICE OF FILING OF FIRST AMENDED COMPLAINT AND JURY DEMAND  
PURSUANT TO FED R. CIV. P. 15(a)(2) AND ECF NO. 84**

---

Plaintiff A.V., a child, through his mother and next friend, Michelle Hanson, by and through counsel, Jack Robinson of SPIES, POWERS & ROBINSON, P.C., and Mark Silverstein, Sara R. Neel, Arielle Herzberg, and Asma Kadri Keeler of the AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF COLORADO, respectfully gives notice that Plaintiff is filing this First Amended Complaint.

Plaintiff files this First Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2), which allows a party to amend its pleading with the court's leave, and pursuant to this Court's February 18, 2022 Order (ECF No. 84), which granted leave for Plaintiff to file an Amended Complaint on or before March 18, 2022. Plaintiff's counsel informed Defendants' counsel of its plan to amend the Complaint on February 23, 2022.

Attached to this notice is a clean copy of the proposed amended pleading and a redlined copy of the proposed amended pleading compared against the original pleading, in accordance with WJM Revised Practice Standard (III)(E).

Respectfully submitted this 18<sup>th</sup> day of March, 2022.

*/s/ Arielle Herzberg*

---

Mark Silverstein  
Sara R. Neel  
Arielle K. Herzberg  
Asma Kadri Keeler  
American Civil Liberties Union  
Foundation of Colorado  
303 E. 17th Street #350  
Denver, Colorado 80203  
Phone: (720) 402-3104  
[msilverstein@aclu-co.org](mailto:msilverstein@aclu-co.org)  
[sneel@aclu-co.org](mailto:sneel@aclu-co.org)  
[aherzberg@aclu-co.org](mailto:aherzberg@aclu-co.org)

Jack D. Robinson  
SPIES, POWERS & ROBINSON, P.C.  
1660 Lincoln Street, Suite 2220  
Denver, Colorado 80264  
Telephone: (303) 830-7090  
[robinson@sprlaw.net](mailto:robinson@sprlaw.net)

*In cooperation with the ACLU Foundation of  
Colorado*

ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of March, 2022, a correct copy of the forgoing **NOTICE OF FILING OF FIRST AMENDED COMPLAINT AND JURY DEMAND PURSUANT TO FED R. CIV. P. 15(a)(2) AND ECF NO. 84** was filed via CM/ECF and served on the following:

Michelle Hanson  
*Mother and next friend of Plaintiff A.V.*  
*Served via email*

Mark Silverstein  
Sara R. Neel  
Arielle Herzberg  
Asma Kadri Keeler  
American Civil Liberties Foundation of Colorado  
303 E. 17th Avenue Suite 350  
Denver, Colorado 80203  
Phone: (720) 402-3104  
[msilverstein@aclu-co.org](mailto:msilverstein@aclu-co.org)  
[sneel@aclu-co.org](mailto:sneel@aclu-co.org)  
[aherzberg@aclu-co.org](mailto:aherzberg@aclu-co.org)  
*Attorneys for Plaintiff*  
*Served via CM/ECF*

Jack D. Robinson  
SPIES, POWERS & ROBINSON, P.C.  
1660 Lincoln Street, Suite 2220  
Denver, Colorado 80264  
Telephone: (303) 830-7090  
[robinson@sprlaw.net](mailto:robinson@sprlaw.net)  
*Attorney for Plaintiff*  
*Served via CM/ECF*

M. Brent Case  
Jonathan P. Fero  
M. Johnathan Koonce  
1120 Lincoln Street, Suite 1308  
Denver, CO 80203  
(303) 595-0941  
[bcase@semplelaw.com](mailto:bcase@semplelaw.com)  
[jfero@semplelaw.com](mailto:jfero@semplelaw.com)  
[jkoonce@semplelaw.com](mailto:jkoonce@semplelaw.com)  
*Attorneys for Defendant Douglas County School District RE-1*  
*Served via CM/ECF*

Sean Kelley Dunnaway  
Douglas County Deputy County Attorney  
100 Third Street  
Castle Rock, CO 80104  
(303) 660-7414  
[kdunnawa@douglas.co.us](mailto:kdunnawa@douglas.co.us)

*Attorneys for Defendants Tony Spurlock, Sidney Nicholson, Lyle Peterson and Daniel Coyle*  
*Served via CM/ECF*

By: s/ Arielle Herzberg  
ACLU of Colorado