

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOE, et al., individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

NORTHWESTERN UNIVERSITY,

Defendant.

Case No. 1:24-cv-04125-JRB-JC

Honorable John Robert Blakey

**PLAINTIFF JOHN DOE 3'S UNOPPOSED MOTION TO PROCEED
PSEUDONYMOUSLY**

Pursuant to Federal Rules of Civil Procedure 5.2 and 26(c), Plaintiff John Doe 3 ("Plaintiff") respectfully moves the Court to permit him to proceed under a pseudonym. Plaintiff's counsel certifies that they conferred with opposing counsel on August 26, 2024 and that Defendant does not oppose the relief sought in this motion.

Plaintiff is a Jewish student at Northwestern University ("Northwestern") who alleges civil rights violations based on threats of physical violence due to his religious identity while on campus, as well as retaliation and false accusations by individuals that attended pro-Hamas demonstrations at Northwestern. As a victim of hostility and discrimination based on his Jewish identity, Plaintiff reasonably fears further harm and retaliation from disclosure of his identity. As explained further in the accompanying memorandum and Plaintiff's declaration, this harm is not speculative but grounded in the calls for violence against Jews on campus, and indeed, actual acts of violence. Moreover, Plaintiff reasonably fears retaliation because his perpetrators remain on campus and, over the course of the summer, have continued their efforts to harass and threaten Jews out of hatred.

The public interest in open proceedings is outweighed by the public interest in allowing victims of discrimination to proceed anonymously so as not to chill access to the justice system for victims. Also, Northwestern will not be hindered in its defense of the litigation as Plaintiff has disclosed his identity to the university's lawyers and only seeks to protect his identity from the public.

Accordingly, the harm to Plaintiff from disclosure of his identity exceeds the likely harm from concealment. *Doe v. City of Chicago*, 360 F.3d 667, 669 (7th Cir. 2004) (citations omitted).

WHEREFORE, for the reasons more fully set forth in the accompanying materials, Plaintiff respectfully requests that the Court grant his motion to proceed anonymously. A proposed Protective Order is filed herewith.

Dated: August 30, 2024

Respectfully submitted,

By: /s/ Elizabeth A. Fegan

Elizabeth A. Fegan
FEGAN SCOTT LLC
150 S. Wacker Dr., 24th Floor
Chicago, IL 60606
Ph: 312.741.1019
Fax: 312.264.0100
beth@feganscott.com

Jonathan D. Lindenfeld (*Pro Hac Vice*)
FEGAN SCOTT LLC
305 Broadway, 7th Floor
New York, NY 10007
Ph: 332.216.2101
Fax: 312.264.0100
jonathan@feganscott.com

David Freydin
LAW OFFICES OF DAVID FREYDIN
8707 Skokie Blvd # 312
Skokie, IL 60077
Ph: 312.544.0365
Fax: 866.575.3765

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on August 30, 2024, she caused the foregoing motion to be filed electronically with the Clerk of the U.S. District Court, using the Court's CM/ECF system, which sent electronic notification to all parties who have appeared and are registered as CM/ECF participants in this matter.

/s/ Elizabeth A. Fegan
Elizabeth A. Fegan