

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
AT LAFAYETTE

JANE DOE, as next friend to her minor  
daughters, JOAN DOE and JILL DOE,

Civil Action No.  
Section:

v.

VERMILION PARISH SCHOOL BOARD,  
RANDY SCHEXNAYDER, Superintendent,  
BILL SEARLE, District A, ANGELA FAULK,  
District B, DEXTER CALLAHAN, District C,  
RICKY LEBOUF, District D, ANTHONY  
FONTANA, District E, CHARLES CAMPBELL,  
District F, CHRIS MAYARD, District G, RICKY  
BROUSSARD, District H, and DAVID DUPUIS,  
Principal, Rene A Rost Middle School.

**DECLARATION OF JANE DOE**

Jane Doe, does hereby affirm and attest as follows:

1. My name is Jane Doe. I am proceeding in this matter under a pseudonym to protect myself and my minor children. I request that the Court Order the parties involved in this litigation not to disclose my identity, or the identity of my children, or any information that may disclose our identities, to protect my children.
2. I am the mother of Joan and Jill Doe.
3. Joan just started eighth grade at Rene A. Rost Middle School in Kaplan, Louisiana.
4. Jill just started sixth grade at Rene A. Rost Middle School in Kaplan, Louisiana.
5. I do not have a choice in where my children attend school; they are assigned there based upon where we live.
6. On August 4, 2009, I attended orientation for Rene A. Rost Middle School. At orientation, we were told by David Dupuis, the principal, that all students would be segregated according to sex.

7. I did not understand this to be optional. I was not asked for feedback, or for my consent.
8. I do not believe that my girls should be separated from boys. I do not believe in treating people differently based upon their sex or gender.
9. I am concerned that, if my daughters are separated based upon their sex or gender, they are being discriminated against.
10. I do not want teachers choosing materials for my daughters based upon the fact that they are “girls.”
11. For example, I want my girls to have the opportunity to read all books, not just books that are supposed to be interesting to girls. I believe that my daughters will lose something if they only have the opportunity to learn about the “feminine” world.
12. I want my daughters to have a complete, well-rounded education. This separation based upon sex feels like a giant step backwards to me.
13. I do not believe that separate can be equal. I believe that if they are separated, they will be treated unequally.
14. I also believe that it is not good for my daughters’ socialization for them to be separated from boys.
15. When we were told that they were separating the two sexes I was concerned that that segregation was illegal, so I contacted the ACLU.
16. School started on August 17, and all classes were segregated according to sex.
17. Last week my daughters brought home a form for me to check whether I wanted them to be in sex-segregated classes or co-educational classes.
18. I checked that I wanted my children in co-educational classes.
19. My eldest daughter, Joan, was approached by Principal Dupuis. He told her to talk to me about my decision to leave Jill, my youngest daughter, in all girl classes.
20. My youngest daughter, Jill, was also approached by Principal Dupuis. He told her to tell me to call him. He said that Jill was “too smart” to be in co-ed classes.
21. Joan told me that the eighth grade co-ed class is being added to the “special needs” class.

22. Joan wanted to be in single-sex classes, I think because of the pressure from Principal Dupuis, because the co-ed is the “special needs” class, and therefore, because a lot of her friends are choosing the single sex classes. Against my wishes, she changed her form to single-sex.
23. My sixth grader, Jill, wanted to be in co-educational classes. She turned in the form I filled out electing to be in co-educational classes.
24. However, Jill was told that the co-ed classes are full, and that she has to stay in single-sex classes.
25. On Wednesday and Thursday, September 2 and 3, the children being moved to co-ed classes received new schedules. Jill’s schedule stayed the same.
26. Therefore, against my wishes, both of my children are being segregated according to their sex.
27. Jill is being segregated because the co-ed classes are “full.”
28. Joan is being segregated because she changed the form. However, I believe that this is the school’s fault, because they started school two weeks before the form coming out. She was settled into her schedule, and her sex-segregated block included all of her friends. Therefore, she was presented with the option of “electing out” of the class that all of her friends were in. This, plus the structure of the class being added to the “special needs class,” pressured my daughter to go against my wishes.
29. Even if they switch my individual children to co-ed classes, I believe that the damage has been done.
30. I believe that the very fact that they offer single-sex classes creates an environment in which my daughters are pressured to conform to gender roles or stereotypes.
31. I refuse to allow my children to be pigeon-holed into ideas about boys and girls. I want them to be treated as individuals.

I hereby declare this under penalty of perjury, this the 8<sup>th</sup> day of September, 2009,

---

Jane Doe