

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jane Doe and John Doe, individually, and
on behalf of Baby Doe,

Plaintiffs,

Case No. 15-cv-02639 (JRT/SER)

vs.

Emily Johnson Piper, in her official capacity
as Commissioner of the Minnesota
Department of Human Services, and
Lori Swanson, in her official capacity
as Minnesota Attorney General,

Defendants.

**Plaintiffs' Motion for
Summary Judgment**

Plaintiffs hereby move the Court and respectfully request that the Court grant summary judgment in Plaintiffs' favor, declaring that Minnesota Statute § 260.761, subdivisions 3 and 6 violate the Fourteenth Amendment to the United States Constitution and issue a permanent injunction enjoining the future enforcement of those provisions. Plaintiffs' motion is based upon the Verified Complaint for Declaratory and Injunctive Relief, the Declaration of Mark D. Fiddler, Plaintiffs' Memorandum in Support of their Motion for Summary Judgment, arguments of counsel, and all other pleadings and documents filed herein.

NEWMARK STORMS LAW OFFICE LLC

Dated: December 30, 2016

/s/ Jeffrey S. Storms
Jeffrey S. Storms, #0387240
Andrew M. Irlbeck, #392626, *of counsel*
100 South Fifth Street, Suite 2100
Minneapolis, MN 55402
Phone: 612-455-7500
Fax: 612.455.7051
Email: jeff@newmarkstorms.com
andrew@irlbecklaw.com

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HOVLAND & RASMUS, P.A.
R. Daniel Rasmus, #0260289
6800 France Avenue South, Suite 190
Edina, MN 55435
Phone: 612.874.8550
Fax: 612.874.9362
Email: drasmus@hovlandrasmus.com

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FIDDLER LAW OFFICE, P.A.
Mark D. Fiddler, #0197853
6800 France Avenue South, Suite 190
Edina, MN 55435
Phone: 612.822.4095
Fax: 612.822.4096
Email: mark@fiddler-law.com

Attorneys for Plaintiffs