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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MADISON McPHERSON, an
individual; A.M., a minor by and
through her guardian, Saul Ruiz,
MARIBEL MUNOZ, an individual;
H.H., a minor by and through her
guardian ad litem, Aiysha Hazameh,
HANAN HAZAMEH, an individual;

Plaintiff(s),

v.

JURUPA UNIFIED SCHOOL
DISTRICT; CALIFORNIA
INTERSCHOLASTIC FEDERATION;
and CALIFORNIA DEPARTMENT OF
EDUCATION;

Defendant(s)

Case No: 5:25-cv-02362-SSS-SP
Assigned to Hon. Judge Sunshine Suzanne
Sykes / Courtroom 2
(Complaint filed on 09/09/25)

**DEFENDANT JURUPA UNIFIED
SCHOOL DISTRICT'S NOTICE OF
MOTION AND MOTION TO DISMISS
CLAIMS IN PLAINTIFFS' FIRST
AMENDED COMPLAINT PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 12(B)(6); MOTION TO
STRIKE PRAYER FOR PUNITIVE
DAMAGES AGAINST THE DISTRICT
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 12(F)**

[Filed concurrently with Memorandum of
Points and Authorities; Declaration of
Regina Zernay; [Proposed] Order]

Date: March 13, 2026
Time: 2:00 p.m.
Courtroom: 2

TO ALL PARTIES AND TO ATTORNEYS OF RECORD HEREIN:
PLEASE TAKE NOTICE that on March 13, 2026 at 2:00 p.m., or as soon
thereafter as may be heard in Courtroom in Courtroom 2, of the above-entitled court,

located at 3470 Twelfth Street Riverside, CA 92501, Defendant, JURUPA UNIFIED SCHOOL DISTRICT (the “District”) will and hereby does move the Court for an Order dismissing the following claims, without leave to amend, in the First Amended Complaint filed by Plaintiffs Madison Mcpherson; A.M., a minor by and through her guardian ad litem, Saul Ruiz; Maribel Munoz; H.H., a minor by and through her guardian ad litem Aiysha Hazameh; and Hanan Hazameh:

- First Cause of Action alleged by Plaintiffs McPherson, A.M., H.H. against the District for Violation of Title IX – Sex Discrimination;
- Second Cause of Action alleged by Plaintiffs McPherson, A.M., H.H. against the District for Violation of Title IX – Facial Challenge;
- Fourth Cause of Action alleged by Plaintiffs McPherson, A.M., H.H. against the District for Equal Protection Violation – Sex Discrimination;
- Fifth Cause of Action alleged by all Plaintiffs against the District for Violation of Free Exercise Clause of the First Amendment under 42 U.S.C. § 1983; and
- Sixth Cause of Action alleged by Plaintiffs McPherson, A.M., H.H. against the District for Violation of Free Speech Clause of the First Amendment under 42 U.S.C. § 1983.

The motion to dismiss is made pursuant to Federal Rule of Civil Procedure 12(b)(6) on the grounds that the causes of action fail to state a claim upon which relief can be granted and Plaintiffs Maribel Munoz and Hanan Hazameh lack standing to assert their claims.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Civil Procedure 12(f), the District will and hereby does move the Court for an Order striking Plaintiffs’ request for punitive damages against it.


This Motion is based on this Notice, the attached Memorandum of Points and Authorities, the anticipated Reply, the Declaration of Regina Zernay, the papers and

1 records in the Court's file in this action and the related cases, and such oral and
2 documentary evidence as may be presented at the hearing.

3 This Motion is made following the conferences of counsel pursuant to L.R. 7-3
4 which took place on October 1, 2025 and December 4, 2025. (Zernay Decl., ¶¶ 4, 5.)
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6 DATED: January 9, 2026

McCUNE & HARBER, LLP

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8 By: 
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11 REGINA ZERNAY, ESQ.
12 Attorneys for Defendant, JURUPA
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