

No. 05-15759  
Oral Argument Scheduled March 24, 2008

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

**SAVANA REDDING, a minor by her  
mother and legal guardian, APRIL  
REDDING,**

Petitioner,

v.

**SAFFORD UNIFIED SCHOOL  
DISTRICT #1; KERRY WILSON and  
JANE DOE WILSON, husband and wife;  
HELEN ROMERO and JOHN DOE ROMERO, wife and husband;  
PEGGY SCHWALLIER and JOHN DOE  
SCHWALLIER, wife and husband,**

Respondents.

---

**MOTION FOR LEAVE TO FILE  
BRIEF *AMICI CURIAE* ON BEHALF OF THE NATIONAL ASSOCIATION  
OF SOCIAL WORKERS AND THE NATIONAL ASSOCIATION OF  
SOCIAL WORKERS, ARIZONA CHAPTER,  
IN SUPPORT OF REVERSAL**

---

The National Association of Social Workers and the National Association of Social Workers, Arizona Chapter, respectfully request leave to file the accompanying brief *amicus curiae* in this case. Counsel for Petitioner Redding has

consented to the filing. Counsel for Respondents have refused counsel for *amici*'s request for consent to the filing.

With 145,000 members, the National Association of Social Workers (“NASW”) is the largest organization of professional social workers in the world. The Arizona Chapter of NASW represents 1,936 members. NASW’s members are highly trained and experienced professionals who counsel individuals, families, and communities in a variety of settings, including schools, making them directly involved as providers of mental health services to schoolchildren who experience trauma. Additionally, NASW and its chapters conduct research, prepare studies of interest to the profession, and develop and promulgate professional standards for social workers.

NASW supports the fact that children and youth are developmentally different from adults and must be treated appropriately. NASW also has a particular interest in the treatment of children and adolescents in schools. NASW has found that an important positive health factor for adolescents is a school where staff members create empathetic relationships with students and provide opportunities for youth to feel competent, valued, and respected. NASW and the Arizona Chapter of NASW submit this brief *amici curiae* to explain and document why strip searches of adolescents are extremely intrusive, and to demonstrate their traumatic effect on adolescents and school communities.

This *amici* brief will be helpful to the Court because it provides additional information, including social science research and commentary, regarding the intrusive nature and the damaging effects of strip searches on adolescents. This information is important for this Court to determine whether the strip search of Savanna Redding was reasonable in scope. The brief also addresses discrete factual and legal issues related to determining whether the strip search violated Savanna Redding's rights under the Fourth Amendment. Accordingly, *amici* believe that the brief is desirable and helpful, and request that the Court direct the Clerk to accept it for filing.

Respectfully submitted,



Counsel for *Amici Curiae*  
David A. Handzo  
Julie M. Carpenter  
Michael A. Hoffman  
Jenner & Block LLP  
601 13th Street, N.W.  
Washington, DC 20005  
202-639-6000

February 21, 2008

**No. 05-15759**  
**PROOF OF SERVICE BY U.S. MAIL**

I, Michael A. Hoffman, declare that on February 21, 2008, I served a copy of the foregoing document by U.S. mail, postage-prepaid, on the following parties:

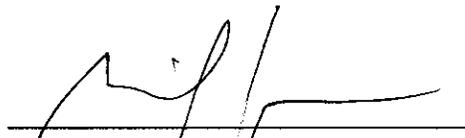
Matthew W. Wright  
David K. Pauole  
Holm, Wright, Hyde & Hays  
10429 S. 51st St., Suite 285  
Phoenix, AZ 85044-5234  
*Attorneys for Defendants-Appellees*

Andrew J. Peterson  
Humphrey & Peterson  
3861 East Third St.  
Tucson, AZ 85716  
*Attorney for Plaintiff-Appellant*

Bruce G. Macdonald  
McNamara, Goldsmith, Jackson & Macdonald  
1670 E. River Rd.  
Tucson, AZ 85718  
*Attorney for Plaintiff-Appellant*

Adam B. Wolf  
ACLU Foundation  
1101 Pacific Ave., Ste. 333  
Santa Cruz, CA 95060  
*Attorney for Plaintiff-Appellant*

Daniel Joseph Pochoda  
ACLU of Arizona  
P.O. Box 17148  
Phoenix, AZ 85011  
*Attorney for Plaintiff-Appellant*



David A. Handzo  
Julie M. Carpenter  
Michael A. Hoffman  
Jenner & Block LLP  
601 13th Street, N.W.  
Washington, DC 20005  
202-639-6000

February 21, 2008