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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

ROY and JOSIE FISHER, et al.,)
Plaintiffs,)

UNITED STATES OF AMERICA,)
Plaintiff-Intervenor,)

vs.)

ANITA LOHR, et al.,)
Defendants,)

and)
SIDNEY L. SUTTON, et al.,)
Defendants-Intervenors.)

MARIA MENDOZA, et al.,)
Plaintiffs,)

UNITED STATES OF AMERICA,)
Plaintiff-Intervenor,)

vs.)

TUCSON UNIFIED SCHOOL)
DISTRICT NO. ONE, et al.,)
Defendants.)

CIVIL ACTION
NO.: 74-90 TUC DCB
(consolidated case)

**UNITED STATES' OBJECTION TO
THE SPECIAL MASTER'S
REPORT AND RECOMMENDATION
REGARDING THE
ADMINISTRATOR AND
CERTIFICATED STAFF
OUTREACH, RECRUITMENT AND
RETENTION PLAN**

1 Plaintiff-Intervenor the United States Department of Justice (“United States” or
2 “DOJ”), by and through counsel here undersigned, objects to the Special Master’s June 4,
3 2014 Report and Recommendation (ECF No. 1612) (“June 4, 2014 R&R”) on the Tucson
4 Unified School District No. 1’s (“TUSD” or “District”) Administrator and Certificated
5 Staff Outreach, Recruitment and Retention Plan (“ACSORR”). The references in that
6 document to DOJ’s objections are incorrect, as DOJ did not object to the District’s revised
7 ACSORR. Rather, the DOJ’s objections referred to a prior version of the ACSORR,
8 provided by the District on July 30, 2013. With a limited exception, the District’s May 22,
9 2014 ACSORR responded to DOJ’s prior concerns. The only item DOJ requested that the
10 District has not provided is additional data adding comparative Metropolitan Statistical
11 Areas (“MSAs”) to the Labor Market Study (“LMS”). However, DOJ agrees with the
12 Special Master’s statement in the June 4, 2014 R&R that, because TUSD’s recruitment
13 obligations do not hinge solely on the LMS, it is not necessary at this time to receive the
14 additional MSA data previously requested.
15

16 Therefore, the United States objects to the references in the June 4, 2014 R&R that
17 suggest that the DOJ agrees with any of the objections contained therein, and, further,
18 requests that such references be struck.

19 Respectfully submitted, this 10th day of June, 2014,

20 /s/ Zoe M. Savitsky

21 JOCELYN SAMUELS

22 Acting Assistant Attorney General

Civil Rights Division

23 ANURIMA BHARGAVA, Chief

24 ZOE M. SAVITSKY

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2014, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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