

EXHIBIT 2

Juan Rodriguez

From: Thompson, Lois D. <lthompson@proskauer.com>
Sent: Tuesday, February 17, 2015 3:05 PM
To: wbrammer@rllaz.com; TUSD (TUSD@rllaz.com); julie.tolleson@tusd1.org; 'Brown, Samuel'; wdh@umd.edu; rsjr3@aol.com; Anurima Bhargava; Zoe Savitsky; Eichner, James (CRT) (James.Eichner@usdoj.gov)
Cc: Juan Rodriguez
Subject: Objections to TUSD Eval plan
Attachments: USP Budget CEP BH Objections (2).docx

Dear Bill Brammer and Others,

While the Mendoza Plaintiffs initially believed that the District's proposal to combine its approach to assessments essential to determine the efficacy of student support programs funded with 910(g) money with its overall approach to evaluations to support the District's Five-Year Strategic Plan made sense, as the process has evolved and as Dr. Hawley's memo of February 15, 2015 confirms*, it now appears that the District's overall evaluation plan may in fact substantially delay analysis of the effectiveness of individual programs being funded with 910(g) money and thereby preclude the District, the plaintiffs, and the Special Master from obtaining the very information the Mendoza Plaintiffs sought when they objected to the 2014-15 budget process and that the Court mandated in its October 22, 2014 Order. Mendoza Plaintiffs therefore seek assurance that there will be outcome data for EVERY student support program funded with 910(g) money each year, including existing programs for which funding is sought for the 2015-16 school year. In particular, they seek confirmation from the District that in this and every subsequent budget year there will be a response to the following evaluation question for each student support program funded with 910(g) money: "If the program/intervention is currently being used in TUSD, please provide internal along with external data. IF SO, WHAT DO THE DATA SAY?" (Capitlization in the original.) If such confirmation is received, Mendoza Plaintiffs do not anticipate filing a separate objection to the District's recent submission since Dr. Hawley's memo and planned objection covers the issues they would otherwise raise.

*Mendoza Plaintiffs have attached Dr. Hawley's memo. (While captioned Budget Objections, the memo refers to the evaluation process.)

Lois D. Thompson

Partner

[Proskauer](#)

2049 Century Park East
Suite 3200
Los Angeles, CA 90067-3206
d 310.284.5614
f 310.557.2193

lthompson@proskauer.com

greenspaces

Please consider the environment before printing this email.

From: Willis D. Hawley [<mailto:wdh@umd.edu>]
Sent: Sunday, February 15, 2015 12:37 PM
To: Rubin Salter, Jr.; jrodriguez@maldef.org; Thompson, Lois D.; Bhargava, Anurima (CRT); zoe.savitsky@usdoj.gov; james.eichner@usdoj.gov; deseg@tusd1.org; tusd@rllaz.com
Cc: Balentine, Vicki Eileen - (vbalenti)
Subject: RE: Objections to TUSD Eval plan

As you may have found, I did not send the objections. Here they are.

From: Willis D. Hawley
Sent: Sunday, February 15, 2015 12:04 PM
To: 'Rubin Salter, Jr.'; jrodriguez@maldef.org; lhompson@proskauer.com; Bhargava, Anurima (CRT); zoe.savitsky@usdoj.gov; james.eichner@usdoj.gov; deseg@tusd1.org; tusd@rllaz.com
Cc: Willis D. Hawley
Subject: Objections to TUSD Eval plan

Please see attached. I will file this formally. While there were some good discussions that went into the District's plan, we never did bring closure. I thought we had agreed on some things but the process is such that changes get made or understanding differ. This is s draft but since the plaintiffs have only until Thursday to object, if the wish, I want to share this now. Later today I will share thoughts on the budget process proposal submitted by the District.

Willis D. Hawley
Professor of Education and Public Policy
University of Maryland
Senior Advisor
Southern Poverty Law Center

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