

1 LOIS D. THOMPSON, Cal. Bar No. 093245 (Admitted Pro Hac Vice)
lthompson@proskauer.com
2 JENNIFER L. ROCHE, Cal. Bar No. 254538 (Admitted Pro Hac Vice)
jroche@proskauer.com
3 PROSKAUER ROSE LLP
2049 Century Park East, 32nd Floor
4 Los Angeles, California 90067-3206
Telephone: (310) 557-2900
5 Facsimile: (310) 557-2193

6 JUAN RODRIGUEZ, Cal. Bar No. 282081 (Admitted Pro Hac Vice)
jrodriguez@maldef.org
7 THOMAS A. SAENZ, Cal. Bar No. 159430 (Admitted Pro Hac Vice)
tsaenz@maldef.org
8 MEXICAN AMERICAN LEGAL DEFENSE AND
EDUCATIONAL FUND (MALDEF)
9 634 S. Spring St.
11th Floor
10 Telephone: (213) 629-2512 ext. 121
Facsimile: (213) 629-0266

11 Attorneys for Mendoza Plaintiffs
12

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF ARIZONA**

15 Roy and Josie Fisher, et al.,

16 Plaintiffs,

17 v.

18 United States of America,

19 Plaintiff-Intervenors,

20 v.

21 Anita Lohr, et al.,

22 Defendants,

23 Sidney L. Sutton, et al.,

24 Defendant-Intervenors,
25
26
27
28

Case No. 4:74-CV-00090-DCB

**MENDOZA PLAINTIFFS' RESPONSE
TO TUSD RESPONSE AND LIMITED
OBJECTION TO SPECIAL MASTER'S
REPORT AND RECOMMENDATION
RELATING TO THE TUSD USP
BUDGET FOR 2017-18 [ECF 2070] AND
REQUEST FOR COURT DIRECTION
RE: MASSD DEPARTMENT**

Hon. David C. Bury

1 Maria Mendoza, et al.,
2 Plaintiffs,
3 United States of America,
4 Plaintiff-Intervenor,
5 v.
6 Tucson United School District No. One, et
7 al.,
8 Defendants.

Case No. CV 74-204 TUC DCB

9
10 Pursuant to Section V, 4, b of the Order Appointing Special Master, Mendoza
11 Plaintiffs submit the following Response to the TUSD Response and Limited Objection to
12 Special Master’s Report and Recommendation Relating to the TUSD USP Budget for
13 2017-18 [ECF 2070] (“TUSD Budget Response”) and request for Court direction re:
14 MASSD Department.
15

16 **Recommendation #1, Criteria for Determining Mentor Support for First and Second**
17 **Year Teachers and Teachers of Culturally Relevant Courses (CRC)**

18 *Mentor Support for First and Second Year Teachers*

19 In its discussion of Recommendation # 1, the District fails to respond to the Special
20 Master’s recommendation concerning the formula for determining mentor support for first
21 and second year teachers. (*See* TUSD Budget Response at 2:14-23.) Mendoza Plaintiffs
22 therefore do not know whether TUSD accepts the Special Master’s recommendation that
23 the Court approve the District’s formula for determining the ratio of mentors to first and
24 second year teachers but “clarify that this formula does not apply to first year teachers in
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1 high achieving schools that are racially concentrated”¹. (Special Master’s Report and
2 Recommendation on 2018 Budget 8/31 (“Budget R&R”), Doc. 2070, at 6:1-3).

3 Mendoza Plaintiffs do not believe that the Special Master’s recommendation is
4 workable because it is ambiguous, recommends approval for a seemingly arbitrary teacher-
5 mentor ratio, and conflicts with this Court’s direction concerning assignment of required
6 mentors. They therefore urge the District, when it replies to this Response, to confirm that
7 it has not agreed to the recommendation.
8

9 First, this Court will recall that in its December 27, 2016 Budget Order (Doc. 1981),
10 it emphasized that it is “imperative that TUSD develop meaningful mentor-teacher ratios
11 for first and second year teachers *who teach in racially concentrated schools* **and** schools
12 where student performance is below the District average and for beginning teachers at all
13 other TUSD schools. These ratios shall be developed and used for the 2017-18 USP
14 Budget.” (Doc. 1981 at 6:15-18; emphasis added.) The Special Master’s recommendation
15 to eliminate from the District’s proposed formula the emphasis on providing mentoring at
16 racially concentrated schools conflicts with this Court’s directive.
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19 Second, beyond the conflict with this Court’s December 27, 2016 Order, the Special
20 Master’s recommendation is problematic in that it creates several ambiguities in
21 connection with its undefined reference to the District formula not applying to “first year
22 teachers” in “high achieving” racially concentrated schools. To begin, it is unclear what
23 the Special Master means by “high achieving” racially concentrated schools and it
24 therefore is unclear to which subset of racially concentrated schools the Special Master
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26

27 ¹ Although the R&R does not so state, Mendoza Plaintiffs assume that the Special Master
28 intended his requested clarification to apply to second year teachers in “high achieving”
racially concentrated schools as well.

1 refers. Indeed, given that the District formula is based on a number system in which the
2 number of required mentors is determined by looking at the points accorded to teachers
3 depending on their placement in a racially concentrated school and status as a first or
4 second year teacher, it is hard to determine how the Special Master's recommendation
5 would affect the District's point-based system (*see* Doc. 2070 at 3:20-25). Beyond these
6 practical issues, to the extent the Special Master intended his recommendation to eliminate
7 the District formula emphasis as to all racially concentrated schools, Mendoza Plaintiffs
8 offer the following: given the USP emphasis on and provisions related to racially
9 concentrated schools (with heavy proportions of students in the Mendoza class), there is no
10 reasoned basis for why first and second year teachers at a racially concentrated school that
11 is, for example, performing at the District average (and therefore is neither
12 "underperforming" nor "high achieving") should not receive the benefit of a point system
13 that prioritizes mentoring at racially concentrated schools.
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17 In an effort to resolve an issue that has now consumed substantial time, although
18 Mendoza Plaintiffs continue to believe that the District has put forward a formula that is
19 internally inconsistent², they are willing to accept the District's formula as set forth on
20 page 3 of the Budget R&R, so long as that formula is not revised to omit first year teachers
21 in "highly achieving schools" that are racially concentrated.
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25 ² Mendoza Plaintiffs still do not understand the reasoning underlying the District's
26 seemingly arbitrary point-based formula. For example, they do not understand why a first
27 year teacher at a performing or non-racially concentrated school would be accorded twice
28 as many points as a second year teacher at the same type of school, but a first year teacher
at an underperforming or racially concentrated school would be accorded fifty percent
more points than a second year teacher at the same type of school. (Budget R&R at 3.)

Mentor Support for CRC Teachers

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2 Mendoza Plaintiffs are unsure of what the Special Master means in his reference to
3 the “parties’ agree[ment] that the mentor to teacher ratio [for CRC teachers] should be 1 to
4 10 for the first year and 1 to 15 in the second year” (Budget R&R at 4:15-16) as they do
5 not recall having agreed to that formula. Further, as detailed below, the District’s
6 proposed formula conflicts with the Special Master’s recommendation and illustrates the
7 arbitrary nature of the District’s ratios.

8
9 As Mendoza Plaintiffs have in the past explained, in order to arrive at a meaningful
10 CRC Master Teacher (or CRC itinerant teacher) ratio, given the many duties beyond
11 mentoring required of these teachers, the District would need to first determine the
12 itinerant teacher FTE required to perform all other tasks, and then apply a mentoring ratio
13 based on research to arrive at a total FTE equivalent required to meet the mentoring needs
14 of the “itinerant teacher model” in the CRC Stipulation (Doc. 1761, Exhibit 2). (*See*
15 Mendoza Plaintiffs’ Objections to the Tucson Unified School District’s USP Budget for
16 the 2017-18 School Year (“Mendoza Plaintiffs’ Budget Objections”), Doc. 2038 at 25:22-
17 26:6.) Mendoza Plaintiffs have never seen a District formula that takes into account the
18 non-mentoring tasks of CRC Master Teachers. Indeed, Mendoza Plaintiffs understand that
19 the absence of such a formula was the basis for the Special Master’s statements that the
20 “District does not have a formula for determining the level of effort involved in [Master
21 Teachers’ duties] beyond mentoring duties. It is important that the District develop such a
22 formula so that arguments over the appropriate level of expenditure for master teachers
23 and CRC can be avoided going forward.” (Budget R&R at 4:25-5:1.)
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1 Although purporting to do so, the District has not developed such a formula.
2 Indeed, the District proposes a 1:10 ratio for first-year CRC teachers and a 1:15 ratio for
3 second-year CRC teachers. (TUSD Budget Response, Exhibit 1.) However, that formula
4 does not calculate the number of FTEs required to perform CRC Master Teacher non-
5 mentoring tasks and add it to the FTEs required to perform mentoring tasks as determined
6 using the CRC mentoring ratio, to arrive at a total required CRC Master Teacher FTE.
7 Thus, the time CRC Master Teachers will be spending on mentoring will in actuality
8 reflect a smaller mentoring ratio than 1:10 ratio for first-year CRC teachers and a 1:15
9 ratio for second-year CRC teachers. This approach therefore plainly and materially
10 deviates from the approach the District applies for mentors for first and second year
11 teachers outside the CRC context and illustrates that the ratios are arbitrary. Thus,
12 Mendoza Plaintiffs do not believe the District's CRC Master Teacher formula reflects the
13 Special Master's Budget R&R statement that the "rationale for assigning mentors should
14 be consistent across different situations in which mentors are provided." (Budget R&R at
15 3:15-16.)

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19 For the reasons stated above, Mendoza Plaintiffs object to the District formula put
20 forth in Exhibit 1 to the TUSD Budget Response and request that this Court Order the
21 District to determine the FTE required for CRC Master Teachers to perform non-
22 mentoring tasks, and that that figure be determined separately from the CRC mentoring
23 formula in TUSD Budget Response, Exhibit 1, to arrive at the total number of required
24 CRC Master Teacher FTEs.
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1 **Recommendation #2, the Higher Ground Issue**

2 Notwithstanding the reservations they expressed concerning the District’s plan to
3 contract with Higher Ground to provide Social-Emotional Learning (“SEL”) lessons to
4 students assigned to DAEP (*see* Mendoza Plaintiffs’ Budget Objections at 26-27), they did
5 not file an objection to the Special Master’s recommendation. Nonetheless because
6 planning for the coming school and budget year already is going forward, they note the
7 following:
8

9 The Higher Ground program is yet another instance of something the Special
10 Master has repeatedly critiqued, that is, the District bringing in outside consultants rather
11 than developing its own capacities and integrating the skills of those consultants into the
12 fabric of the District’s pedagogy. In this regard, the website of the Collaborative for
13 Academic, Social and Emotional Learning to which the Special Master makes reference
14 (Budget R&R at 7:1-2) is enlightening. The site states that “[f]or a growing number of
15 schools and districts, SEL has become a coordinating framework for how educators,
16 families, and communities partner to promote students’ social, emotional, and academic
17 learning. SEL is embedded in their strategic plans, staffing, professional learning, and
18 budgets. It guides their curriculum choices and classroom instruction – both direct practice
19 in SEL as well as integrated instruction with reading, math, history, and other core
20 subjects.” (*See* www.casel.org (under “What is SEL?” tab).)
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23

24 **IF** the District is able to establish that the SEL approach it is pursuing is “based on
25 solid research reflecting program effectiveness”, as this Court required in its Order of
26 December 22, 2015 (Doc. 1879) at 8:1-2, and **IF** the District wishes to pursue SEL in the
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1 future, Mendoza Plaintiffs urge that it do so in an integrated manner like that described
2 above, and develop its own internal capacity to support that effort.

3 **Recommendation #3, Student Success Specialists (“SSS”)**

4 Mendoza Plaintiffs did not object to the Special Master’s bottom line conclusion in
5 his R&R discussion of Student Success Specialists that the AASSD and MASSD
6 departments have not adequately served the needs of the District’s African American and
7 Latino students, that the District’s “budget for SSS and plans for redeployment should be
8 sustained” and that the “District’s search for better ways to serve African American and
9 Latino students should continue.” (Budget R&R at 9:2-4.)
10

11
12 They note that in its Budget Response, TUSD states that it has worked with the
13 Fisher Plaintiffs to “develop further agreements regarding AASSD funding and staffing”
14 (TUSD Budget Response at 3:5-12) but that it has not sought to work with the Mendoza
15 Plaintiffs to address the multiple concerns they raised about the current state of the
16 MASSD both in direct discussion with the District and in the Mendoza Plaintiffs’ Budget
17 Objections. They therefore ask that the District be directed to engage the Mendoza
18 Plaintiffs in discussion like that which has occurred with the Fisher Plaintiffs so that the
19 Mendoza Plaintiffs may have direct input into the reorganization of the MASSD just as the
20 Fisher Plaintiffs are having input into the reorganization of the AASSD.
21

22
23 In particular they ask that the District take steps to enhance the stature and visibility
24 of MASSD and pursue the Special Master’s suggestion that, as anticipated in the USP, it
25 serve as “consultant[] and provide insight with respect to culturally responsive practices
26 whether it be manifest in teaching, curriculum, coaching, administering discipline, working
27 with families, or developing future district policies and procedures.” (Mendoza Plaintiffs’
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1 Budget Objections at 20:11-15, quoting Recommendation of the Special Master Regarding
2 Version 3 of 910G Budget, Doc. 2020, at 2.)

3 Further, as also discussed in their Budget Objections, Mendoza Plaintiffs ask that
4 the District immediately move the focus and approach of the MASSD to an affirming
5 asset model rather than the deficit model that has characterized the activities of the
6 Department in recent years. Additionally, again as discussed in their Budget Objections,
7 they ask that the MASSD assume a central role in ensuring that the persons serving as
8 point persons for family engagement in the schools are appropriately trained in culturally
9 responsive practices and that the MASSD personnel serve as an on-going resource for
10 them. (Mendoza Plaintiffs' Budget Objections at 20:24-22:12.)
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13 **Recommendation #4, Goals for Magnet Schools**

14 The District states that it “strongly objects” to what it says is the “implication” that
15 the “Court must ‘require’ it to follow [the] recommendation” that it “inform each school
16 what the Court-approved goals for academic achievement are and the extent of the
17 progress each school needs to make in order to achieve those goals.” (TUSD Budget
18 Response at 3:17-22.)
19

20 In fact, such direction is needed because, notwithstanding that there has been no
21 new Court order addressing achievement goals³ and certainly no order amending the USP -
22 -which expressly states that one of the objectives of the Student Engagement portion of the
23 Plan is to “us[e] strategies to seek to close the achievement gap and eliminate the racial
24 and ethnic disparities for these students in academic achievement (USP, Section V, E, 1,
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27 _____
28 ³ See Order dated 3/13/17 (Doc. 1996) at 2:22-26 for a recent reference by this Court to the goal of closing achievement gaps.

1 a) -- the magnet school improvement plans that the District revised this summer to
2 incorporate the 2016-17 AZMerit results no longer reference the goal of closing the
3 achievement gap.

4 Thus, for example, the Booth Fickett 2015-2016 improvement plan stated that it
5 would “reduce the achievement gap between white and African American students by 7%
6 (from -32% to -25%) in math and 3% (from -21% to -18%) in reading, as determined by
7 the results of the 2015-16 AZ Merit.” In its 2016-17 plan it stated that by “ June 2017, the
8 achievement gap between racial groups at Booth-Fickett will be less than the achievement
9 gap between racial groups who do not participate in magnet programs at comparable
10 schools.” It expressed a comparable goal for the 2017-18 school year in the plan filed with
11 the Court on June 21, 2017. (*See*, Doc. 2028-1 at 469 of 531.) But, in the August 2017
12 revision (a copy of which is attached as Exhibit 1), all reference to closing achievement
13 gaps has disappeared.
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17 The District appears to seek to justify this omission by asserting that the Special
18 Master has proposed the abandonment of the goal related to narrowing the achievement
19 gap in assessing magnet school achievement and that “discussions [between the Special
20 Master and the District] about Court-approved goals are ongoing and fluid” (TUSD
21 Budget Response at 3, n.1.) There are two quick responses to this excuse for having
22 walked away from a focus on (much less a goal of) closing achievement gaps: (1) the
23 Court-approved (**and USP mandated**) goal of closing achievement gaps remains in place
24 and (2) Mendoza Plaintiffs (and, they believe, the Fisher Plaintiffs as well) have made it
25 very clear that they disagree with the Special Master’s suggestion to “abandon” the goal
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1 although they do understand that the District’s mechanistic application of a “one size fits
2 all” approach is not productive. Therefore, this Court should indeed “require” that each
3 magnet school have a meaningful goal of reducing achievement gaps premised on an
4 assessment of that school’s overall level of proficiency on the AZMerit exams as
5 compared to schools at the same level in the District.
6

7 **Response to “Other Issues of Concern:” Family Engagement**

8 In the TUSD Budget Response, the District attempts to frame the Special Master’s
9 recommendation concerning the “develop[ment of] guidelines for principals and other staff
10 members for implementing strategies for working with families and communities” at the
11 school site level as an effort to impose “new” requirements on the District by asserting that
12 the USP and Family and Community Engagement (“FACE”) Plan “do[] not require the
13 development” of such guidelines. (TUSD Budget Response at 6-7.) The District is wrong
14 because the Special Master’s recommendation is not a “new” requirement. To the
15 contrary, it directly relates to long-existing FACE Plan recommendations, **developed by**
16 **the District itself** following its review and assessment of “the District’s existing family
17 engagement and support programs, resources, and practices” in August and October 2013
18 (see FACE Plan (Doc. 1852-1) at 7-8; 14-22), pursuant to the USP Section VII, C, 1, b
19 requirement to conduct that review and assessment. Thus, there is nothing improper
20 about the Special Master making a recommendation to address issues TUSD identified
21 long ago that it has not adequately addressed.
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26 First, the District’s very first FACE Plan recommendation, directed to the District
27 itself, was to “Create District-Wide Strategies” because its family engagement “efforts
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1 were not connected to one another as part of a comprehensive scheme.” (*Id.* at 14.)
2 Further, under the recommended approach to “Promote a District Family Engagement
3 Vision,” the FACE Plan states that the District will “create the infrastructure to support
4 family engagement that... will support the implementation of district-wide family
5 engagement.” (*Id.* at 15.) The Special Master’s recommendation concerning family
6 engagement guidelines for school sites plainly is meant to address this issue, given his
7 express findings that “the effectiveness and scope of family and community engagement
8 efforts vary across schools” (*id.* at 17:27-28) and that “the District has provided little
9 information about the implementation of family engagement at the school level” (*id.* at
10 18:17-18).⁴ Significantly, these are the very problems the District itself identified as part
11 of its FACE plan assessment -- but has yet to address. Thus, the Special Master’s
12 recommendation for guidelines to assist sites in their family engagement efforts is
13 precisely the type of District-wide strategy that the FACE Plan envisioned as part of a
14 broader “comprehensive scheme” for family engagement.
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18 Second, the FACE Plan addressed the weakness of the District’s family engagement
19 efforts being “focused on parental involvement rather than informing parents about student
20 learning and the parents’ role in their student’s success” by recommending that the District
21 “Build[] School Capacity (to Engage Families)” by “strengthen[ing] families’ knowledge
22 and skills to support and extend their children’s learning at home and in the community by
23
24

25 ⁴ The District should not be surprised that the Special Master is addressing this issue as
26 the uneven nature of family engagement efforts across schools has often been raised with
27 the District and this Court. (*See, e.g.,* Special Master’s Annual Report for the 2015-16
28 School Year (Doc. 2026) at 28:10-11 (“Family Engagement through parent-teacher
organizations, school advisory councils or other formal arrangements appears to be uneven
across the District...”).)

1 organizing a well-planned partnership program to engage all families in their children's
2 education.” (Face Plan at 17-18.) Further, the USP requires that the District implement
3 “strategies for how teachers and principals can learn from families regarding how to meet
4 the needs of their children.” (USP Sections VII, C, 1, a and VII, A, 1, (c).) The Special
5 Master's recommendation too addresses these FACE Plan recommendations and USP
6 requirements in that the Special Master recommends that the guidelines to be developed
7 include “specific actions that would facilitate learning from families how best to meet the
8 needs of their students in culturally responsive ways.” (Budget R&R at 18:10-11.) The
9 Special Master's recommendation further reflects his recommended “two-way strategy” of,
10 “in addition to providing information to parents about how they can assist their children to
11 achieve at higher levels... learning from parents and other family members about the
12 needs... that their children face so that teacher can use this knowledge... .” (*See id.* at
13 16:24-26.) Thus, the Special Master's recommendation clearly is directed at advancing the
14 recommendations the District made to itself, but has not adequately pursued, in the FACE
15 Plan.
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19 Third, the FACE Plan called attention to the fact that the District “Review and
20 Assessment [conducted under USP Section VII, C, 1, b] revealed there is no system to
21 provide consistent access to programs or a way of evaluating the effectiveness of
22 programs.” (FACE Plan at 21.) The District therefore committed to “develop and
23 implement ongoing assessments and create a schedule for monitoring and evaluation.”
24 (*Id.*) The Special Master's recommendation addresses this ongoing issue as well, as the
25 “proposed guidelines will provide a way that central administration and the family
26 engagement staff can provide oversight and support where necessary” to school sites (Doc.
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1 2070 at 19:1-3) given that “there is no systematic process for identifying activities
2 underway at the school level, much less identifying effective practices that could be
3 shared” (*id.* at 17:28-18:1) and the District has not provided evidence “regarding the
4 amount or effectiveness of SAIL training as it relates to family and community
5 engagement” (*id.* at 17:15-16). (*See also*, Court’s Order of March 13, 2017 at 3:18-21
6 (“[T]he Court is discouraged that at this late date, ‘there is no ongoing evaluation of the
7 various approaches to... variations in family engagement efforts.’ Have these approaches
8 not been implemented long enough here to reflect either some or no success?”)

9
10
11 Indeed, as discussed above, given the long-identified issues and recommendations
12 of the FACE plan for which insufficient District progress has been made, there plainly is
13 nothing new or improper about the Special Master’s recommendation for guidelines to
14 help sites implement meaningful family engagement strategies as part of a broader and
15 consistent framework to help the District move toward unitary status. Mendoza Plaintiffs
16 further note that in suggesting that this Court’s December 2016 Order prohibits the
17 recommended guidelines from being submitted to the Plaintiffs for review and comment
18 (TUSD Budget Response at 6:26-7:5), the District ignores the Court’s express ruling that
19 the need for review and comment “shall be determined by the Special Master.” (Court’s
20 December 27, 2016 Order at 9:13-14, 11:13-14.) Plainly, the Special Master determined
21 that, given how long-outstanding the issues to which his recommendation is directed are
22 and the breadth of those issues, the Plaintiffs should have an opportunity to weigh in. This
23 Court therefore should not accord any weight to the misguided arguments in the TUSD
24 Budget Response.
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1 **Response to “Other Issues of Concern:” CARE/UPKEEP**

2 As stated in Mendoza Plaintiffs’ Budget Responses, Mendoza Plaintiffs object to
 3 the District’s proposed facilities allocation for “CARE/UPKEEP” “only insofar as the
 4 District intends to use ‘CARE/UPKEEP’ funds for maintenance at schools not a priority
 5 under USP Section IX, A, 3 or that would not raise student health or safety concerns if
 6 gone unaddressed.” (Mendoza Plaintiffs’ Budget Responses at 29:9-13.) Pursuant to the
 7 Special Master’s recommendation, the District has agreed to “provide raionales for any
 8 910G funds used for care and upkeep.” (TUSD Budget Response at 7:19-20.)

9
 10 However, problems that affect this issue persist, including with how any budget
 11 allocation approved for this effort would be spent.⁵ As the Court may recall, the District
 12 unilaterally changed weights accorded to the “communications” and “grounds”
 13 components of the Facilities Condition Index (“FCI”). (*See, e.g.*, Special Master’s Annual
 14 Report for the 2015-16 School Year (Doc. 2026) at 30.)⁶ Mendoza Plaintiffs understand
 15 that notwithstanding the Special Master’s recommendation that the District “return to the
 16 originally agreed-upon FCI formula delineations” (*id.* at 30:19-20), the District has
 17 declined to do so. It is therefore unclear to the Mendoza Plaintiffs the extent to which the
 18 District’s unilateral changes have affected what would be considered a “priority” under
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22 _____
 23 ⁵ Mendoza Plaintiffs have long sought to resolve this issue, including directly with the
 24 District and Special Master to avoid burdening this Court with it. (*See* Mendoza
 25 Plaintiffs’ December 6, 2016 response to the District’s response to bring instances of
 TUSD noncompliance to the Court’s attention, Doc. 2016-3, Exhibit 28 at 5-6.) They have
 been unable to do so, and therefore are constrained to do so here given that the issue
 affects how any budget allocation for this activity will be spent.

26 ⁶ The Mendoza Plaintiffs do not here detail the District’s unilateral changes or all the
 27 issues raised by those changes. However, the Mendoza Plaintiffs respectfully invite this
 28 Court to review pages 39-40 of Mendoza Plaintiffs’ Opposition to TUSD’s Motion for
 Partial Unitary Status (Doc. 2016) should it require greater explanation of the District’s
 unilateral changes to the FCI.

1 USP Section IX, A, 3 and the Multi-Year Facilities Plan, notwithstanding the District's
2 unsupported assertion that the changes have made no difference. Thus, Mendoza Plaintiffs
3 are concerned that there may be priorities identified solely as a result of the unilateral
4 revision to the FCI, which would thus constitute improper supplantation.

5
6 Therefore, Mendoza Plaintiffs respectfully request that this Court require the
7 District to provide an analysis of whether its unilateral changes have affected facilities
8 priorities under USP Section IX, A, 3 together with the rationale for use of 910G funds for
9 CARE/UPKEEP that the District has agreed to provide (*see* TUSD Budget Response at
10 7:19-20).
11

12
13 Dated: September 29, 2017
14

15 MALDEF
16 JUAN RODRIGUEZ
17 THOMAS A. SAENZ

18 /s/ Juan Rodriguez
19 Attorney for Mendoza Plaintiffs

20 PROSKAUER ROSE LLP
21 LOIS D. THOMPSON
22 JENNIFER L. ROCHE

23 /s/ Lois D. Thompson
24 Attorney for Mendoza Plaintiffs
25
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CERTIFICATE OF SERVICE

I hereby certify that on I electronically submitted the foregoing MENDOZA PLAINTIFFS' RESPONSE TO TUSD RESPONSE AND LIMITED OBJECTION TO SPECIAL MASTER'S REPORT AND RECOMMENDATION RELATING TO THE TUSD USP BUDGET FOR 2017-18 [ECF 2070] AND REQUEST FOR COURT DIRECTION RE: MASSD DEPARTMENT to the Office of the Clerk of the United States District Court for the District of Arizona for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

P. Bruce Converse
bconverse@steptoe.com

Paul K. Charlton
pcharlton@steptoe.com

Timothy W. Overton
toverton@steptoe.com

Samuel Brown
samuel.brown@tusd1.org

Robert S. Ross, Jr.
robert.ross@tusd1.org

Rubin Salter, Jr.
rsjr@aol.com

Kristian H. Salter
kristian.salter@azbar.org

James Eichner
james.eichner@usdoj.gov

Shaheena Simons
shaheena.simons@usdoj.gov

Peter Beauchamp
peter.beauchamp@usdoj.gov

Special Master Dr. Willis D. Hawley
wdh@umd.edu

Dated: September 29, 2017

/s/ Juan Rodriguez
Juan Rodriguez