	Case 4:74-cv-00090-DCB Document	2151 Filed 12/06/18 Page 1 of	3
1	TUCSON UNIFIED SCHOOL DISTR	RICT	
2	LEGAL DEPARTMENT 1010 E. Tenth Street		
3	Tucson, Arizona 85719 Telephone: (520) 225-6040		
4	Robert S. Ross (State Bar No. 023430) Robert.Ross@tusd1.org		
5	Samuel E. Brown (State Bar No. 027474 Samuel.Brown@tusd1.org	4)	
6	STEPTOE & JOHNSON LLP 201 East Washington Street, Suite 1600		
7	Phoenix, Arizona 85004-2382 Telephone: (602) 257-5200		
8	Facsimile: (602) 257-5299 P. Bruce Converse (State Bar No. 00586	8)	
9	bconverse@steptoe.com		
10	Timothy W. Overton (State Bar No. 025 toverton@Steptoe.com	009)	
11	Attomage for Tueson Unified		
12	<i>Attorneys for Tucson Unified</i> <i>School District No. 1</i>		
13	UNITED STAT	ES DISTRICT COURT	
14	UNITED STATES DISTRICT COURT		
15		T OF ARIZONA	
16	Roy and Josie Fisher, et al., Plaintiffs, v.	4:74-cv-00090-DCB (Lead Case)	
17	V. Tucson Unified School District No. 1,		
18	et al.,		
19	Defendants.		
20	Maria Mendoza, et al.,	CV 74-204 TUC DCB	
21	v. Plaintiffs,	(Consolidated Case)	
22	Tucson Unified School District No. 1,		
23	et al. Defendants.		
24			
25	NOTICE AND REP	PORT OF COMPLIANCE:	
26	AASSD and MASS	SD OPERATING PLANS	
27			
28			
~			

1	The Court directed the District to prepare and file a notice and report of		
2	compliance with its directive to prepare plans for operating the African American		
3	Student Services Department (AASSD) and Mexican American Student Services		
4	Department (MASSD) beyond a declaration of unitary status. [ECF 2123 at 121-22,		
5	150.] The District has prepared these plans, which are attached hereto as Exhibits A and		
6	B. The District respectfully submits that it has complied with the Court's order, and		
7	requests that the Court grant partial unitary status in this area of District operations (USP		
8	§ V.E.7-8). ¹		
9	RESPECTFULLY SUBMITTED this 6th day of December, 2018.		
10	STEPTOE & JOHNSON LLP		
11			
12	By <u>/s/ P. Bruce Converse</u> P. Bruce Converse		
13	Timothy W. Overton		
14	TUCSON UNIFIED SCHOOL DISTRICT LEGAL DEPARTMENT		
15	Robert S. Ross Samuel E. Brown		
16	Attorneys for Tucson Unified School District		
17	No. 1		
18			
19			
20			
21			
22			
23			
24			
25	¹ The District submits this notice and report without weiver of its objections that		
26	¹ The District submits this notice and report without waiver of its objections that there is no basis in fact or law for continued federal court supervision of the District in this or only other area including the maximum the attached plan area.		
27	this or any other area, including the requirement of preparing the attached plan, given the findings of Judge Frey in 1978, subsequent rulings of this Court, and the record herein. The District recognizes that the Court has overruled these objections, and that		
28	they are the subject of a pending appeal.		

CERTIFICATE OF SERVICE

1	<u>CERTIFICATE OF SERVICE</u>
2	The foregoing document was filed with the Court electronically through the
3	CM/ECF system this 6th day of December, 2018, causing all parties or counsel to be
4	served by electronic means, as more fully reflected in the Notice of Electronic Filing.
5	
6	/s/ Diane Linn
7	Employee of Steptoe & Johnson LLP
8	
9	
10	
11	
12	
13	
14 15	
15	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

- 3 -