

**TUCSON UNIFIED SCHOOL DISTRICT
LEGAL DEPARTMENT**

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School District No. 1*

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Roy and Josie Fisher, et al.,
Plaintiffs,
v.
Tucson Unified School District No. 1,
et al.,
Defendants.

4:74-cv-00090-DCB
(Lead Case)

Maria Mendoza, et al.,
Plaintiffs,
v.
Tucson Unified School District No. 1,
et al.,
Defendants.

CV 74-204 TUC DCB
(Consolidated Case)

**NOTICE AND REPORT OF COMPLIANCE:
ELL ACTION PLAN**

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The Court directed the District to prepare and file a notice and report of compliance with its directive to prepare an ELL Action Plan for dropout prevention. [ECF 2123 at 140, 151.] The District has prepared and implemented ELL Action Plan, and it is attached hereto as Exhibit A. The District respectfully submits that it has complied with the Court’s order, and requests that the Court grant partial unitary status in this area of District operations (USP § V.E.1.b.i).¹

RESPECTFULLY SUBMITTED this 6th day of December, 2018.

STEPTOE & JOHNSON LLP

By /s/ P. Bruce Converse
P. Bruce Converse
Timothy W. Overton

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LEGAL DEPARTMENT**
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Attorneys for Tucson Unified School District
No. 1

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 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 they are the subject of a pending appeal.

CERTIFICATE OF SERVICE

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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.
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7 /s/ Diane Linn
8 Employee of Steptoe & Johnson LLP
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