

**TUCSON UNIFIED SCHOOL DISTRICT
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*Attorneys for Tucson Unified
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:
UPDATE TO THE FACE ACTION PLAN**

1 The Court's order dated September 6, 2018 (ECF 2123) directed the District to
2 prepare and file an update to the FACE Action Plan, reflecting the directives contained
3 in that order. [ECF 2123 at 140, 151.] The District has prepared and implemented an
4 update to the FACE Action Plan, attached hereto as Exhibit A. The District respectfully
5 submits that it has complied with the Court's order, and requests that the Court grant
6 partial unitary status in this area of District operations (USP § VII).¹

7 RESPECTFULLY SUBMITTED this 6th day of December, 2018.

8 **STEPTOE & JOHNSON LLP**

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

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12 **TUCSON UNIFIED SCHOOL DISTRICT
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15 No. 1
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25 ¹ The District submits this notice and report without waiver of its objections that
26 there is no basis in fact or law for continued federal court supervision of the District in
27 this or any other area, including the requirement of preparing the attached plan, given
28 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.

