1       TUCSON UNIFIED SCHOOL DISTRICT LEGAL DEPARTMENT         2       1010 E. Tenth Street Tucson, Arizona 85719         3       Robert S. Ross (State Bar No. 023430)         4       Robert S. Ross (State Bar No. 027474)         5       Samuel E. Brown @tusd1.org         6       STEPTOE & JOHNSON LIP 201 East Washington Street, Suite 1600         7       Phoenix, Arizona 85004-2382 Telephone: (602) 257-5200         8       Facsimile: (602) 257-5200         9       P. Bruce Converse (State Bar No. 005868)         9       beonverse@steptoe.com         10       toverton@Steptoe.com         11       Attorneys for Tucson Unified         12       School District No. 1         13       UNITED STATES DISTRICT COURT         14       DISTRICT OF ARIZONA         17       Notroe Steptoe.com         18       V.         19       Defendants.         19       V.         10       Unified School District No. 1, et al., Defendants.         10       Maria Mendoza, et al., Plaintiffs, v.         11       Defendants.         12       NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN         14       Defendants.         15       NOTICE AND REPORT OF COMPLIANCE: T		Case 4:74-cv-00090-DCB Document 2159 Filed 12/06/18 Page 1 of 3
2       LEGAL DEPARTMENT         1010 E. Tenth Street       Tucson, Arizona 85719         3       Telephone: (520) 225-6040         Robert, Ross@tusd1.org       Samuel E. Brown (State Bar No. 027474)         5       Samuel Brown@tusd1.org         6       STEPTOE & JOHNSON LLP         201 East Washington Street, Suite 1600         7       Phoenix, Arizona 85004-2382         7       Telephone: (602) 257-5200         8       Facsimile: (602) 257-5200         9       P. Bruce Converse (State Bar No. 005868)         bconverse@steptoe.com       Timothy W. Overton (State Bar No. 025669)         10       toverton@Steptoe.com         11       Attorneys for Tucson Unified         12       School District No. 1         13       UNITED STATES DISTRICT COURT         14       DISTRICT OF ARIZONA         15       Roy and Josie Fisher, et al., Plaintiffs, v.         16       V.         17       Tucson Unified School District No. 1, et al., Defendants.         18       V.         19       Defendants.         10       Maria Mendoza, et al., Plaintiffs, v.         11       Defendants.         12       CV 74-204 TUC DCB         13       Defen		
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Tucson, Arizona 85719         Telephone: (520) 225-6040         Robert, Ross@tusd1.org         Samuel, Brown@tusd1.org         Samuel, Brown@tusd1.org         StEPTOE & JOHNSON LLP         201 East Washington Street, Suite 1600         Phoenix, Arizona 85004-2382         Telephone: (602) 257-5200         P. Bruce Converse (State Bar No. 005868)         bconverse@steptoe.com         Timothy W. Overton (State Bar No. 025669)         toverton@Steptoe.com         Timothy W. Overton (State Bar No. 025669)         V.         Tucson Unified School District No. 1, et al., Defendants.         V.         Tucson Unified School District No. 1, et al., Defendan	2	
Robert S. Ross (State Bar No. 023430)         Robert S. Ross @tusdl.org         Samuel E. Brown (State Bar No. 027474)         Samuel Brown @tusdl.org         STEPTOE & JOHNSON LLP         201 East Washington Street, Suite 1600         Phoenix, Arizona 85004-2382         Telephone: (602) 257-5200         Facsimile: (602) 257-5209         P. Bruce Converse (State Bar No. 005868)         bconverse @steptoe.com         11         Attorneys for Tucson Unified         25         16         V.         17         18         19         10         10         11         12         13         14         15         16         17         18         19         10         10         11         12         13         14         15         16         17         18         19         10         111         12         12         12 <t< td=""><td></td><td>Tucson, Arizona 85719</td></t<>		Tucson, Arizona 85719
<ul> <li>Samuel E. Brown (Stafe Bar No. 027474)</li> <li>Samuel.Brown@tusd1.org</li> <li>STEPTOE &amp; JOHNSON LLP 201 East Washington Street, Suite 1600 Phoenix, Arizona 85004-2382 Telephone: (602) 257-5200 Facsimile: (602) 257-5299 P. Bruce Converse (State Bar No. 005868) bconverse@steptoe.com Timothy W. Overton (State Bar No. 025669) toverton@Steptoe.com Attorneys for Tucson Unified School District No. 1 </li> <li>UNITED STATES DISTRICT COURT Attorneys for Tucson Unified School District No. 1 </li> <li>Roy and Josie Fisher, et al., Plaintiffs, v. Tucson Unified School District No. 1, et al., Defendants. </li> <li>Maria Mendoza, et al., Plaintiffs, v. Tucson Unified School District No. 1, et al., Defendants. </li> <li>NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES </li> </ul>		Robert S. Ross (State Bar No. 023430)
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<ul> <li>beonverse@steptoe.com Timothy W. Overton (State Bar No. 025669) toverton@Steptoe.com</li> <li>Attorneys for Tucson Unified School District No. 1</li> <li>UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA</li> <li>Roy and Josie Fisher, et al., V.</li> <li>Roy and Josie Fisher, et al., Plaintiffs,</li> <li>v.</li> <li>Tucson Unified School District No. 1, et al., Defendants.</li> <li>Maria Mendoza, et al., Plaintiffs,</li> <li>v.</li> <li>Tucson Unified School District No. 1, et al., Defendants.</li> <li>Notrice AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES</li> </ul>	8	Facsimile: (602) 257-5299
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12       Attorneys for Tucson Unified         13       UNITED STATES DISTRICT COURT         14       DISTRICT OF ARIZONA         15       Roy and Josie Fisher, et al., Plaintiffs,         16       V.         17       Tucson Unified School District No. 1, et al.,         18       Defendants.         19       Maria Mendoza, et al., Plaintiffs,         12       V.         12       Tucson Unified School District No. 1, et al.         12       Defendants.         13       V.         14       Defendants.         15       NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES	10	
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14       UNITED STATES DISTRICT COURT         15       DISTRICT OF ARIZONA         16       Roy and Josie Fisher, et al., Plaintiffs,       4:74-cv-00090-DCB (Lead Case)         17       Tucson Unified School District No. 1, et al., Defendants.       4:74-cv-00090-DCB (Lead Case)         20       Maria Mendoza, et al., Plaintiffs,       CV 74-204 TUC DCB (Consolidated Case)         21       v.       Plaintiffs,         22       Tucson Unified School District No. 1, et al.       Plaintiffs,         23       Defendants.         24       V.         25       NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES	12	Attorneys for Tucson Unified School District No. 1
14       DISTRICT OF ARIZONA         15       Roy and Josie Fisher, et al., Plaintiffs,       4:74-cv-00090-DCB (Lead Case)         16       V.         17       Tucson Unified School District No. 1, et al., Defendants.       4:74-cv-00090-DCB (Lead Case)         20       Maria Mendoza, et al., V.       Defendants.         20       Maria Mendoza, et al., V.       Plaintiffs, V.         21       V.       Tucson Unified School District No. 1, et al.       CV 74-204 TUC DCB (Consolidated Case)         24       Tucson Unified School District No. 1, et al.       Defendants.         24       NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES	13	
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<ul> <li>Tucson Unified School District No. 1, et al., Defendants.</li> <li>Maria Mendoza, et al., Plaintiffs, v.</li> <li>Tucson Unified School District No. 1, et al. Defendants.</li> <li>Defendants.</li> <li>NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES</li> </ul>	16	Plaintiffs, (Lead Case)
<ul> <li>et al., Defendants.</li> <li>Maria Mendoza, et al., Plaintiffs, v.</li> <li>Tucson Unified School District No. 1, et al. Defendants.</li> <li>Defendants.</li> <li>NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES</li> </ul>	17	
<ul> <li>Maria Mendoza, et al., Plaintiffs, v.</li> <li>Tucson Unified School District No. 1, et al. Defendants.</li> <li>Defendants.</li> <li>NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES</li> </ul>	18	et al.,
<ul> <li>Plaintiffs,</li> <li>V.</li> <li>Tucson Unified School District No. 1, et al.</li> <li>Defendants.</li> </ul> Plaintiffs, (Consolidated Case) (Consolidated Case) (Consolidated Case) <b>Notice And Report of Compliance: TEACHER DIVERSITY PLAN</b> ATTRITION and GYOP STUDIES	19	Derendants.
<ul> <li>v.</li> <li>Tucson Unified School District No. 1, et al. Defendants.</li> <li>Defendants.</li> <li>NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES</li> </ul>	20	
<ul> <li>23 et al. Defendants.</li> <li>24</li> <li>25</li> <li>26 NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN ATTRITION and GYOP STUDIES</li> </ul>	21	
23   Defendants.     24   25     26   NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN     27   ATTRITION and GYOP STUDIES	22	
<ul> <li>25</li> <li>26 NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN</li> <li>27 ATTRITION and GYOP STUDIES</li> </ul>	23	
<ul> <li>26 NOTICE AND REPORT OF COMPLIANCE: TEACHER DIVERSITY PLAN</li> <li>27 ATTRITION and GYOP STUDIES</li> </ul>	24	
20       TEACHER DIVERSITY PLAN         27       ATTRITION and GYOP STUDIES	25	
27 <b>ATTRITION and GYOP STUDIES</b>	26	
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1	The Court directed the District to file its 2018-19 Teacher Diversity Plan (TDP),
2	along with studies of attrition and the District's Grow-Your-Own programs. [ECF 2123
3	at 140, 151.] The analysis of the Teacher Diversity Plan, its implementation for SY18-
4	19, results, and resulting conclusions are set forth in Exhibit A attached hereto. The
5	study and report on attrition is attached is attached as Exhibit B. The review, study and
6	analysis of the District's Grow-Your-Own programs is attached as Exhibit C.
7	Accordingly, the District respectfully submits that it has complied with the Court's
8	order, and requests that the Court grant partial unitary status in this area of District
9	operations (USP IV.A, F.1, I.3). <sup>1</sup>
10	RESPECTFULLY SUBMITTED this 6 <sup>th</sup> day of December, 2018.
11	<b>STEPTOE &amp; JOHNSON LLP</b>
12	
13	By <u>/s/ P. Bruce Converse</u> P. Bruce Converse
14	Timothy W. Overton
15	TUCSON UNIFIED SCHOOL DISTRICT LEGAL DEPARTMENT
16	Robert S. Ross Samuel E. Brown
17	Attorneys for Tucson Unified School District
18	No. 1
19	
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21	
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24	
24 25	<sup>1</sup> The District submits this notice and report without waiver of its objections that
	<sup>1</sup> 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 and
25	<sup>1</sup> 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 and student, 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 before the 9 <sup>th</sup> Circuit.

	Case 4:74-cv-00090-DCB Document 2159 Filed 12/06/18 Page 3 of 3
1	CERTIFICATE OF SERVICE
1 2	The foregoing document was filed with the Court electronically through the
2	CM/ECF system this 6 <sup>th</sup> 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	served by electronic means, as more rang reneeted in the reader of Electronic range.
6	
7	/s/ Diane Linn Employee of Steptoe & Johnson LLP
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