

**TUCSON UNIFIED SCHOOL DISTRICT  
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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)

**SUPPLEMENTAL  
NOTICE AND REPORT OF COMPLIANCE:  
TEACHER DIVERSITY PLAN and GYO PROGRAMS**

1 The Court directed the District to modify its Teacher Diversity Plan and Grow  
2 Your Own programs in accordance with the terms of its order dated April 22, 2019  
3 (ECF 2217), and to file a supplemental notice of compliance within 30 days of its April  
4 22 order. This supplemental notice reports on the efforts of the District to comply with  
5 the Court's directives.

6 In both areas, the primary directive concerned personalized, focused recruiting  
7 among the District's teaching force: (a) to find and recruit District teachers to transfer  
8 from one District school to another, in order to improve diversity at the new school, and  
9 (b) to find and recruit African American and Hispanic teachers in the District to enroll in  
10 either the Leadership Prep Academy or a Master's Cohort program, to improve the  
11 number of qualified minority candidates for administrator positions.

12 Accordingly, the District has designated a central-staff, director-level employee  
13 for whom a major responsibility will be a focused, directed effort to recruit District  
14 teachers for both programs. The District met with the Special Master in early May to  
15 discuss the approach to these issues, and then developed a detailed initial recruiting plan  
16 for both programs based on the discussion in the meeting. The District provided a copy  
17 of the plan to the Special Master, received comments back, and has incorporated most of  
18 those comments into the final plan. The resulting initial recruiting plan for both  
19 programs is set out in Exhibit A.

20 Accordingly, the District respectfully submits that it has complied with the  
21 Court's orders, and requests that the Court grant partial unitary status in this area of  
22 District operations (USP IV.A, F.1, I.3).<sup>1</sup>

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26 <sup>1</sup> The District submits this notice and report without waiver of its objections that  
27 there is no basis in fact or law for continued federal court supervision of the District in  
28 this or any other area, 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.

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RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of May, 2019.

**STEP TOE & JOHNSON LLP**  
By /s/ P. Bruce Converse  
P. Bruce Converse  
Timothy W. Overton

**TUCSON UNIFIED SCHOOL DISTRICT  
LEGAL DEPARTMENT**  
Robert S. Ross  
Samuel E. Brown  
  
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No. 1

**CERTIFICATE OF SERVICE**

The foregoing document was filed with the Court electronically through the CM/ECF system this 22<sup>nd</sup> day of May, 2019, causing all parties or counsel to be served by electronic means, as more fully reflected in the Notice of Electronic Filing.

/s/ P. Bruce Converse  
Employee of Steptoe & Johnson LLP