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. 1	Tucson Unified School District No. 1	
2	Theson Chipted School District 110. 1	
	IN THE UNITED STATES DISTRICT COURT	
FOR THE DISTRICT OF ARIZONA		CT OF ADIZONA
4		
.	Roy and Josie Fisher, et al.,	4:74-cv-0090-DCB
5	Plaintiffs,	(Lead Case)
_	v.	
6		
7	Tucson Unified School District No. 1, et al.,	
. /	Defendants.	
8	Bereiraans.	
	Maria Mendoza, et al.,	4:74-cv-0204 TUC DCB
9	Plaintiffs,	(Consolidated Case)
,,	V.	
20	Tucson Unified School District No. 1, et al.,	
21	ll deson onnied school District No. 1, et al.,	
	Defendants.	
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-2		
		1
23	NOTICE O	
	NOTICE OF PLAN FOR EXPANSION OF DU	. –

The Court directed the District to prepare and file a plan for expansion of its dual language program, including the information specifically requested by the Court. [ECF 2123 at 98-101, 150.] The District has prepared the expansion plan and files it herewith as Exhibit A.

The District respectfully submits that it has complied with the Court's order, and has met the requirements set out in USP § V.C., as shown by the record herein, including its annual reports on the dual language program and its assessment.<sup>1</sup> Accordingly, the District requests that the Court grant unitary status in this area of District operations (USP § V.C).<sup>2</sup>

Dated this 30<sup>th</sup> day of August, 2019.

Respectfully submitted,

## /s/P. Bruce Converse

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<sup>1</sup> Compliance with USP dual language requirements is addressed in the record at the following specific locations incorporated herein by reference: ECF 2057-1, pp. 223-238 and appendices cited therein; ECF 2124-1, pp. 73-79 and appendices cited therein; ECF 2075-5, pp. 19-30, 253-282 and documents cited therein.

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<sup>2</sup> The District submits this notice filing without waiver of its position 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, but wishes to make clear that they are preserved for appeal.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of August, 2019, I electronically transmitted the attached foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to all CM/ECF registrants.

## /s/ P. Bruce Converse