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Tucson Unified School District No. 1

12 **IN THE UNITED STATES DISTRICT COURT**
 13 **FOR THE DISTRICT OF ARIZONA**

14	Roy and Josie Fisher, et al.,	4:74-cv-0090-DCB
15	Plaintiffs,	(Lead Case)
16	v.	
17	Tucson Unified School District No. 1, et al.,	
18	Defendants.	
19	Maria Mendoza, et al.,	4:74-cv-0204 TUC DCB
20	Plaintiffs,	(Consolidated Case)
21	v.	
22	Tucson Unified School District No. 1, et al.,	
23	Defendants.	

24 **NOTICE OF FILING:**
 25 **REVISED FACE PLAN**
 26

1 The Court directed the District to file an update to the FACE Action plan reflecting
2 the Court’s directives in its order dated September 6, 2018. [ECF 2123, at 132-137, 150-
3 51.] The District filed the update on December 6, 2018. [ECF 2154.] In subsequent
4 orders, the Court directed the District to make further revisions to the FACE Action Plan.
5 [ECF 2213, 2217.] The District prepared a revised FACE Action Plan and provided it to
6 the Special Master for review and comment. The Special Master provided thoughts and
7 comments, along with additional requested provisions. The District further revised the
8 FACE Action Plan to take into account the input from the Special Master. The resulting
9 plan is attached hereto as Exhibit A.

10 The District respectfully submits that it has complied with the Court’s orders, and
11 has met the requirements of USP § VII, as shown by the record herein, including its annual
12 reports and its prior assessment of compliance.¹ Accordingly, the District requests that
13 the Court grant unitary status in this area of District operations (§ VII).²
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20 ¹ Compliance with USP requirements for family and community engagement is
21 addressed in the record at the following specific locations incorporated herein by
22 reference: ECF 2057-1, pp. 367-388 and appendices cited therein; ECF 2124-1, pp. 138-
23 143 and appendices cited therein; ECF 2075-7 and documents cited therein.

24 ² The District submits this notice filing without waiver of its position that there is no
25 basis in fact or law for continued federal court supervision of the District in this or any
26 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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Dated this 30th day of August, 2019.

Respectfully submitted,

/s/P. Bruce Converse

P. Bruce Converse

Timothy W. Overton

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Attorneys for Tucson Unified School

District No. 1

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th 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