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Attorneys for defendant
Tucson Unified School District No. 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Roy and Josie Fisher, et al., <p style="text-align: right;">Plaintiffs,</p> v. Tucson Unified School District No. 1, et al., <p style="text-align: right;">Defendants.</p>	4:74-cv-0090-DCB (Lead Case)
Maria Mendoza, et al., <p style="text-align: right;">Plaintiffs,</p> v. Tucson Unified School District No. 1, et al., <p style="text-align: right;">Defendants.</p>	4:74-cv-0204 TUC DCB (Consolidated Case)

NOTICE OF FILING
3-YEAR PLUS INTEGRATION PLAN
AND OUTREACH AND RECRUITMENT ADDENDUM

1 The Court directed the District to develop and file a 3-Year Plus Integration Plan,
2 including individual non-magnet-school integration plans, and the Outreach and
3 Recruitment Addendum, in its September 6, 2018 order. [ECF 2123 at 19-34, 149].

4 The District has developed the 3-Year Plus Integration Plan and files it herewith. It
5 consists of four documents:

6 (a) a Magnet Study, attached hereto as Exhibit A, in which the District analyzes all
7 District schools to determine which schools are potential magnets, which are not, and the
8 most promising magnet themes, all to be used in the event that the District determines to
9 create a new magnet at some point in the future;

10 (b) a Comprehensive Magnet Plan, attached hereto as Exhibit B, setting out revised
11 processes and schedules (i) to support and improve existing magnet programs, (ii) to
12 eliminate a magnet program that is not serving its purpose, and (iii) to create a new
13 magnet;
14

15 (c) Academic Improvement and Integration Plans for non-magnet schools, attached
16 as Exhibit C;¹ and

17 (d) a Transportation Plan to support integration plans at both magnet and non-
18 magnet schools, attached hereto as Exhibit D.

19 In addition, the Court directed the District to prepare an Outreach and Recruitment
20 Addendum for both the Magnet Program and the Advanced Learning Experiences (ALE)
21 Program. [ECF 33-34, 149.] The District has prepared an Outreach and Recruitment
22 Addendum, which is attached hereto as Exhibit E.
23

24 The District respectfully submits that these documents meet the requirements of
25 the Court's order, and that District is entitled to unitary status in this area of operations,
26 as shown by the record herein, including its annual reports and its prior assessment of
27

28 ¹ Academic improvement and integration for magnet schools are addressed in individual magnet school plans.

1 compliance.² Accordingly, the District requests that the Court grant unitary status in this
2 area of District operations (USP § II).³

3
4 Respectfully submitted,

5 /s/P. Bruce Converse

6 P. Bruce Converse

7 Timothy W. Overton

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10 Phoenix, Arizona 85004-4568

11 *Attorneys for Tucson Unified School*

12 *District No. 1*

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23 _____
24 ² Compliance with USP requirements for magnet schools is addressed in the record at
25 the following specific locations incorporated herein by reference: ECF 2057-1, pp. 43-
26 79 and appendices cited therein; ECF 2124-1, pp. 17-34 and appendices cited therein;
27 ECF 2075-2, and documents cited therein.

28 ³ 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, 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.

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

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