

**TUCSON UNIFIED SCHOOL DISTRICT**

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

<p>Roy and Josie Fisher, et al., Plaintiffs,</p> <p>v.</p> <p>Tucson Unified School District No. 1, et al., Defendants.</p>	<p>4:74-cv-00090-DCB (Lead Case)</p>
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<p>Maria Mendoza, et al. Plaintiffs,</p> <p>v.</p> <p>Tucson Unified School District No. 1, et al., Defendants.</p>	<p>CV 74-204 TUC DCB (Consolidated Case)</p>
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**TUSD RESPONSE TO DEPARTMENT OF JUSTICE RESPONSE [ECF 2356] AND  
MENDOZA PLAINTIFF RESPONSE [ECF 2361]  
RE TUSD PARTNERSHIP HIGH SCHOOL AT THE BRIDGES**

Tucson Unified School District – Legal Department  
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2 The Tucson Unified School District, No. 1 (“TUSD” or the “District”), hereby submits  
3 this Response to Responses filed by the Department of Justice (DOJ) and the Mendoza  
4 Plaintiffs related to the District’s Notice and Request for Approval (NARA) to open a new  
5 career-oriented high school in collaboration with Pima County Joint Technical Education  
6 District (JTED)(the “Bridges HS”) [ECF 2336].

7 The DOJ does not object to the proposal, stating “upon careful consideration of  
8 TUSD’s Desegregation Impact Analysis of the proposal, the United States does not oppose  
9 the District’s Notice and Request for Approval...” [ECF 2356 at 2:5-7]. The Fisher Plaintiffs  
10 did not file a response. The Mendoza Plaintiffs “do not object to the District’s undertaking  
11 to partner with JTED to offer TUSD students, including members of the plaintiff classes, the  
12 opportunity to attend a high school offering Career and Technical Educational (“CTE”)  
13 programs that prepare those students for meaningful employment in 21st century  
14 workplaces.” [ECF 2361 at 2:11-15].

15 The Mendoza Plaintiffs identify several conditions upon which they believe approval  
16 should be based. The District has no objection to any of these conditions, as most of them  
17 include actions TUSD plans to take or, in some cases, has already taken. The District is  
18 already working to develop strategies to integrate the Bridges that include marketing,  
19 outreach, recruitment, an express bus, and a modified lottery. The District has already  
20 reached out to Dr. Gary Orfield who has agreed to review the District’s marketing and  
21 recruitment plan, and to consult with the District. The District has already planned for, and  
22 hereby commits to: applying its Teacher Diversity Plan to the Bridges HS and seeking to hire  
23 and retain a diverse staff (there will only be a single TUSD administrator); applying its Code  
24 of Conduct, PBIS, Restorative Practices, and related policies and practices to all students  
25 during the school day; providing the same discipline and CRP training to Bridges HS teachers  
26 as provided in other high schools; and offering CRC courses.

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**Conclusion**

For the reasons stated above, and those outlined in its Notice and Request for Approval, the District respectfully requests approval to open the Bridges HS in SY 2020-21.

Respectfully submitted on November 18, 2019.

**TUCSON UNIFIED SCHOOL DISTRICT  
LEGAL DEPARTMENT**

*s/ Samuel E. Brown*

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**Certificate of Service**

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2 **ORIGINAL** of the foregoing filed via the CM/ECF Electronic Notification System and  
3 transmittal of a Notice of Electronic Filing provided to all parties that have filed a notice of  
4 appearance in the District Court Case.  
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7 s/ Samuel E. Brown  
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