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*Tucson Unified School District No. 1*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF ARIZONA**

14 Roy and Josie Fisher, et al.,  
15 Plaintiffs,  
16 v.  
17 Tucson Unified School District No. 1, et al.,  
18 Defendants.

4:74-cv-0090-DCB  
(Lead Case)

19 Maria Mendoza, et al.,  
20 Plaintiffs,  
21 v.  
22 Tucson Unified School District No. 1, et al.,  
23 Defendants.

4:74-cv-0204 TUC DCB  
(Consolidated Case)

24 **RESPONSE TO ISSUES RAISED IN**  
**SPECIAL MASTER’S REPORT AND RECOMMENDATION RE DISCIPLINE**  
25 **(ECF 2380)**  
26

1 The Special Master's most recent Report and Recommendation regarding progress  
2 in discipline recommended that the Court order the District to respond to the issues raised  
3 by the Special Master. [ECF 2380.] Though the Court has not yet ruled on the Special  
4 Master's recommendation, the District provides herewith its response to those issues, in  
5 order to move the process along. The response is attached hereto as Exhibit A.

6 Dated this 31<sup>st</sup> day of January 2020.

7 Respectfully submitted,

8 **DICKINSON WRIGHT PLLC,**

9 By: /s/ P. Bruce Converse

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15 *Attorneys for Tucson Unified School*  
16 *District No. 1*

**CERTIFICATE OF SERVICE**

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The foregoing document was filed with the Court electronically through the CM/ECF system this 31<sup>st</sup> day of January, 2020, 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 Dickinson Wright PLLC