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21 *Tucson Unified School District No. 1*

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

24 Roy and Josie Fisher, et al.,  
25 Plaintiffs,  
26 v.  
27 Tucson Unified School District No. 1, et al.,  
28 Defendants.  
29 Maria Mendoza, et al.,  
30 Plaintiffs,  
31 v.  
32 Tucson Unified School District No. 1, et al.,  
33 Defendants.

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

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

34 **SUPPLEMENTAL NOTICE AND REPORT OF COMPLIANCE**  
35 **(ECF 2486)**

1 Subject to and without waiving its objections previously stated and referenced  
2 herein, the District hereby provides notice of compliance with the Court’s order entered  
3 on June 4, 2020 (ECF 2471), as amended by the Court’s order entered on June 22, 2020  
4 (ECF 2486).

5 **I. MAGNET ACADEMIC CRITERIA.**

6 Pursuant to the Court’s directive, the District has identified academic criteria to  
7 apply to magnet schools which receive a state letter grade of “C,” to determine which  
8 schools are “MagnetMerit B” schools. In the course of developing the academic criteria,  
9 the District consulted with the Special Master, and the Special Master consulted with  
10 plaintiffs. The academic criteria are set out in the document attached as Exhibit A.

11 The District has applied the academic criteria to all magnet schools receiving a  
12 state letter grade of “C” for the 2018-19 school year, and to Booth-Fickett pursuant to the  
13 Court’s permission in the order entered June 22, 2020 (ECF 2585). Three schools did not  
14 meet the academic criteria: Tully Elementary Magnet School, Booth-Fickett  
15 Math/Science Magnet School, and Palo Verde Magnet High School. Accordingly, the  
16 District will file Targeted Academic Improvement Plans for these schools on September  
17 1, 2020, as required by the Court’s June, 2020 orders.

18 **II. MAGNET INTEGRATION CRITERIA.**

19 The District has selected a definition of integration from among those set out in  
20 the Court’s June, 2020 orders: an integrated school is any school in which no racial or  
21 ethnic group varies from the district average for that grade level (Elementary School,  
22 Middle School, K-8, High School) by more than +/- 25 percentage points, and in which  
23 no single racial or ethnic group exceeds 70% of the school’s enrollment.

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1 The District has applied the integration criteria to all magnet schools using 40<sup>th</sup>  
2 day data from the 2019-20 school year. The only magnet school which does not meet the  
3 integration criteria based on that data is Roskrige Bilingual K-8 Magnet School.  
4 Accordingly, the District will file a Targeted Integration Improvement Plan for this school  
5 on September 1, 2020, as required by the Court's June, 2020 orders.

6 **III. GENERAL OBJECTIONS.**

7 As noted at the outset of this Notice, the District is complying with the orders at  
8 issue subject to and without waiving its general objections set out in previously filed  
9 documents, incorporated herein by reference. These include in particular, but are not  
10 limited to, its objection to the Special Master's 2018 Report and Recommendation (ECF  
11 2099), its Supplemental Petition for Unitary Status (ECF 2460 and 2464), its objection to  
12 the Special Master's Report and Recommendation (ECF 2477), and its motion for  
13 reconsideration of the Court's order dated June 4, 2020 (ECF 2481).

14 **DATED** this 29<sup>th</sup> day of July, 2020.

15 Respectfully submitted,

16 /s/ P. Bruce Converse

17 P. Bruce Converse

18 Timothy W. Overton

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20 *Attorneys for Tucson Unified School*

21 *District No. 1*

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**CERTIFICATE OF SERVICE**

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I hereby certify that on the 29<sup>th</sup> day of July, 2020, 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