

ABL O-CON N

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ABBRE A P ON

PREL M NARY P A P EMEN P

PROCEDMRAL PO P MRE

LEGAL P ANDARD

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N.B. ex rel. Buchanan v. Hamos L ND M y

Orleans Parish Sch. Bd. v. Lexington Ins. Co. o d L C App

Pace v. Bogalusa City Sch. Bd., F d h C r

R.P.-K. ex rel. C.K. v. Dep't of Educ. of Hawaii FR D D

Ray M. by Juana D. v. Bd. of Educ. of City Sch. Dist. of City of N.Y.
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The bre d h nd e en of he e Defend n s o ons of he r gh s of s den s h
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OC D AL O

P n ffs co A o p R r s c pes n o fey

e)3.15789(q)-10.97536(a)3.15789(c)3.150.18|2(D)0.622527(E)-10.18of EA, P375976(l)12.3882(D)0.6225(-)-0.47820

Under *Wal-Mart* the court only narrowly focuses on the nature of the defendant's
conduct or practices. Certain practices involving the rights of individuals
do not necessarily demonstrate the defendant's or the society's
intent to affect the interests regardless of the behavior in the types and severity
of the discriminatory practices. See, e.g. *Lane v. Kitzhaber* 5 F.R.D. 111, 112 D.Or.

h s he ze nd co pe ence o represen he c ss h he proposed c ss represen e
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F d h e he F f h C rc den ed cer f c on of h descr bed s he p n ffs

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s bc sses e press y dop ng he ppro ch fo o ed by he econd C rc n *Marisol A. v.*

Giuliani F d d C r See M.D. F d n h c se he econd

BCLA Present and future Ne Orleans students who have requested but not been provided the specified content and needs design section
P n

Representative Plaintiffs: P B A D p and

BCLA Present and future Ne Orleans students who are ending R D
discrimination or type charter schools who have been or be required for
more than 180 days in school year who have the responsibility of the
discriminatory fees required by the DEA

Representative Plaintiffs: D B L M and L

BCLA Present and future Ne Orleans students who are not or
not be provided the required services connected to her
individualized Education Programs (IEPs)

Representative Plaintiffs: N F and L M

BCLA Present and future Ne Orleans students who have been

▼ F pp d DDC Moreo er s e es b shed h p ren s h e
c se of c on o enforce h s o b g on nder he DEA *Forest Grove Sch. Dist. v. T.A.* ▼

M

h e EAs yp c y de eg e he e ec on of spec f c Ch d F nd c es o oc
ed c on genc es LEAs h s does no re e e he e Defend n s of he e
s ory respons b y o ens re h Ch d F nd s p e en ed *See Forest Grove Sch. Dist.,*

▼ M q o ng M C *Schaffer v. Weast* M
Hawkins ex rel. D.C. v. District of Columbia F pp d DDC

the e Defend n s h e b d c ed he r ff r e Ch d F nd respons b es for
Ne Ore ns s den s n hree ys b y f ng o p e en co prehens e Ch d F nd
po cy h ens res h s ng e Ne Ore ns en y s respons b e for den fy ng nd e ng
s den s r ns on ng b e een schoo s or re no enro ed n schoo b y enforc ng po cy
n con r en on of he DEA req r ng s den s o co p e e Response o n er en on
progr before b e ng e ed for spec ed c on e g b y nd b y doc en ng nd

s bc ss no be ng den fed oc ed nde ed n ccord nce h he DEA C ss de
d d c on s pprop e bec se he s bc ss sc s depend pon h s] co on
con en on h s c p be of c ss de reso on Wal-Mart C M.D. ▾

F d

n r d on schoo sys e s nge LEA schoo d s r c h s r sd c on nd
respons b y for cond c ng Ch d F nd c es h n def ned geogr ph c re nc d ng
for hose ch dren ho re no c rren y enro ed n p b c schoo L B e n ▾ A
fo o s h f ch d s referred for n e on b ch nges schoo s h n he LEA s
geogr ph c re he LEA n ns respons b y for r c ng he s den n n ng he open
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reg ons fo o h s r d on rr nge en req r nge ch Lo s n LEA o den fy
oc e nde e e ch s den s spec ed of h ng d s b y reg rd ess of he se er y of
he d s b y res d ng h n s r sd c on Id.

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fro s nge LEA he Ore ns P r sh choo Bo rd o LEAs of h ch re s nge schoo
ch r er LEAs These s nge schoo LEAs Ch d F nd respons b es re geogr ph c y ed
o he bo nd ry of he ed c on f c y Id. D These ns h of Ne
Ore ns LEAs h e no Ch d F nd r sd c on beyond he r schoo ho se doors Id. see also
E c s Dep The re n ng o LEAs he R D nd OP B h e no c e r y
def ned geogr ph c bo nd r es nd no c e r d s on of Ch d F nd respons b es o s de of
he r o nd rec r n schoo s e ng o d of respons b y for s den s r ns on ng be een
schoo s or no enro ed n schoo E Coo b Dep E Bend y
b Dep ▾ ▾ see also E o r h E p Rp E Me d E p

sys e c s ng For so e ch r er schoo s he

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s den s d d no reenro nd oseph C r Ch r er choo ppro e y
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he co on sense ss p on s h h s s b c ss s s ff c en y n ero s o s sfy R e

the Child Welfare Regulatory scheme has on its face no express or implied
provisions denying the decentralized Nebraska system. The representative
cases for the following common law principles of the state are:

In the Nebraska Defense Fund, the defendant sought to enforce the Child Welfare
policy provisions relating to the child's best interests. Nebraska has no
school or hospital provisions for LEAs as defined and established

In the Nebraska Defense Fund, the defendant sought to enforce the Child
Welfare policy provisions relating to the best interests of the child. The
defendant failed to establish

The Nebraska Defense Fund, the defendant sought to enforce the Child Welfare
policy provisions relating to the best interests of the child. The
Nebraska system is a decentralized system. See *Wal-Mart*. *C. see also M.D.* The
pattern or practice of agency conduct in the defendant's case is
deficient in the agency's sufficient to generate a common law

Furthermore, the resolution of these common law issues does not require
determination of the Nebraska system. The defendant's proposed
arguments have been rejected. The defendant has been deprived of the
defendant's established requirements because no one else has
occurred. The defendant's best interests are not in order. The
defendant's proposed Child Welfare policy provisions are not the
defendant's responsibility.

rights on LEAs received and See Lane FRD

Briefing on the Proposed

Parents request that the Commissioner certify success of present and future New Orleans students who have requested but not been provided with a special education evaluation because they have not completed a "Response to Intervention" program. Parents' Brief and Affidavits are hereby presented for the success of the Commissioner's success in the Defendant's proposed policy in continuation of the DEA requirements and so cooperate Response on intervention RPI program before receiving notification for special education by the special policy present in New Orleans students from receiving the special education on which they are entitled under the DEA

RPI's general education program to provide research based interventions for struggling students hoping to respond to the needs of students See generally Michael P. v. Dep't of Educ. Fed. Cr. Mos RPI orders in the

Despite the DEA's search findings and OEP's guidance on the contrary, Los Angeles policies require students to participate in the RDP process before receiving notification for special education. LA Board of Education's policy requires schools to identify students suspected of having a disability only after the student has participated in the RDP process. The process is intended for the school board to receive recommendations from the school and conduct a hearing. The effect of this policy is to prevent students from being conditioned for enrollment in the RDP process. However, the DEA and the RDP process have been coordinated with the DEA and the RDP process for DEA enrollment. The RDP process is a course LDOE enforces and NEORCS LEAs participate in this policy.

- A March LDOE newsletter discusses the LDOE's receipt of information from parents whose children have been diagnosed with a disability. The newsletter states that the RDP process is a process that is intended to provide a response and progress through the process. The newsletter also states that the RDP process is a process that is intended to provide a response and progress through the process. The newsletter also states that the RDP process is a process that is intended to provide a response and progress through the process.
- LDOE's RDP Coordinator and the RDP process require enrollment in the school board's coordination of the RDP process.
- The RDP process is a process that is intended to provide a response and progress through the process.

The OEP's guidance on the RDP process is based on the RDP process. The RDP process is a process that is intended to provide a response and progress through the process. The RDP process is a process that is intended to provide a response and progress through the process.

Los Angeles policies require students to participate in the RDP process before receiving notification for special education. LA Board of Education's policy requires schools to identify students suspected of having a disability only after the student has participated in the RDP process. The process is intended for the school board to receive recommendations from the school and conduct a hearing. The effect of this policy is to prevent students from being conditioned for enrollment in the RDP process. However, the DEA and the RDP process have been coordinated with the DEA and the RDP process for DEA enrollment. The RDP process is a course LDOE enforces and NEORCS LEAs participate in this policy.

the inappropriateness of referring to the children for the purpose of special education services. E.D. As a result of the R.D.s, the children's educational progress is not as good as it should be. The R.D.s recognize that the children's educational progress is not as good as it should be. E.D.

Concluding that the children in the proposed special education program are not making educational progress as fast as they should, the Local Special Education

Or e ns s den s be referred o he R̄p process E And s no ed bo e of
R D s den s n he R̄p process re n̄p er nd bes pr c ce nd c es h he p̄ er
s den s re hose os e y n need of n DEA e on p̄h s co on sense
ss p on s h of he ny h ndreds of Ne Or e ns s den s n R̄p nc d ng hose
ng sh ng n̄p er ho n DEA referr e o er s den s re en ed o b h e
no rece ed spec ed c on e on *See Susan J. FRD R.P.-K. ex rel.*
C.K. FRD Moreo er he proposed s bc ss nc des f re n no n s den s
ng o nder pr c c be *See Jack F d Jones F d*

s DEA e on po cy *Wal-Mart* C

yp c

The c s of he represen e P n ffs P B nd A re yp c of he proposed
s bc ss n h h e been s r y den ed spec ed c on e on h e hey re
req red o co p e e he R p process p h s n ry s e s fro s ng e po cy nd h s he

he s...ory sche e he schoo d s r c s no free o choose h ch s e prefers f
s den se g b e nder DEA pprop e ser ces sh be pro ded *Yankton Sch. Dist. v.*
Schramm F d h C r The EA be rs e respons b y for
ens r ng h LEAs re co p y ng h he DEA s Ch d F nd req re en s h ch nc des
ens r ng h LEAs re no d sreg rd ng hese ob g ons n f or of he ess r goro s nd o er
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The e Defend n sh e ho y b d c ed he r on or ng nd co p nce
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b Dep E Bo on b Dep

The e Defend n sh e ong been on no ce h Ne Or e ns LEAs sys e c y
o er re y on ec on P ns o o d pro d ng req red spec ed c on e ons

- A repor by he Ed c on ppor ys e s on Ne Or e ns ch r er schoo s
fo nd h n s on sh ng n ber of p ns h d

in sounding of students LDOE recognized that there appears to be a large number of R.D. schools that are high numbers *Id.*

Parents per Dr. O. H. concluded that his proper order reference by Ne. Oregon LEAs on education plans contributes to the system under definition of Ne. Oregon children under the DEA. E. O. H. E. P. R. P. The experiences of the named Parents represent serious the problem.

•

Adequacy of Dependent

For the reasons stated *supra* the Plaintiff's alleged conduct for
and due to the negligence of the Plaintiff's possession
denies the Defendant's alleged NEORA for the purpose of
Plaintiff's alleged negligence has not been established for conduct of DEA employees

Courts recognize the standard under Rule 10(b) is primarily proper in
cases such as this one where the system of government agencies and
processes. *See Jones v. Diamond*

choose the best or correct sentence to complete the sentence for
behavioral functions of herds

character schools to provide these for disciplinary referrals. LDOE has funded the
engineering research center. As the result of the DEA monitoring system, LDOE could be
RD direct in schools for systemic compliance with the DEA in the following results

-

more than generous in not noting non-compliance.” E e ph s s dded A depos on

LDOE d ed h s s proper E McE ee Dep

The e Defend n s req red he R D d rec r n nd pype ch r er schoo s o
p e en hree consec e correc e c on p ns o ddress he r despre d non co p nce
h he DEA s d sc p n ry s feg rds hese LEAs con n y f ed o de ons r e
pro e en See E see also E o r h E p Rp n f c n Febr ry

LDOE no ed L e progress h s been de by

R D d rec r n nd type ch r ers ongo ng sys e c nonco p nce he e Defend n s
dr s c y sc ed b c he r DEA on or ng c es nd co p nce e s res Fr s LDOE
red ced he scope of he type ch r ers CAP Or g n y he CAP pp ed o type
ch r ers n Ne Or e ns E McE ee Dep B n
h gh r n ng LDOE off c s s p y dec ded n er y nd ho d sc ss on h he CAP
o d no pp y on y o he dozen nd d ch r ers h LDOE on ored on s e nd ced
for non co p nce E McE ee Dep ph s c re o ed o er
Ne Or e ns LEAs fro he scope of he n ens e correc e c on p n
econd n he schoo ye r LDOE s opped s on s e DEA on or ng
progr oge her nd no re es so e y on p per sed re e s no n s des d s o
s sfy s DEA on or ng ob g ons E McE ee Dep E Osborn Dep
ph s ne y dop ed po cy s nd rec conf c h s e reg ons on DEA
co p nce on or ng A des d pro des no e dence h proced r s feg rds re
c y p e en ed E McE ee Dep E o r h E p
Rp n s ch ng o des d sys e LDOE spec ed c on s ff no ed h
benef of re o ng on s e on or ng s o e e h gh o e of LEAs fro go ng
nder CAPs E

Ms ng des d LDOE ce red he R D d sc p n ry CAP E McE ee Dep
ph s des d s cond ced by s ng e person nd cons sed of oo ng on y
s den records h no n er e s of s ff p ren s or s den s nd no c ssroo obser ons
Id. By con r s he pr or ye r s on s e on or ng s s n
h ch LDOE no ed con n ed nd orsen ng o ons ere f c ed by e of bo e gh

disc p n ry s feg rds ongs R D d rec r n nd type ch r er LEAs For ns nce he

R D d rec r n nd type ch r er LEAs p c ed n he CAP re o ed s den s

h d s b es hro gh o of schoo s spens ons d r ng he schoo ye r E And

n de er n ng ongo ng non co p nce n Febr ry LDOE re ed pon s den records

nd c ed o er one h ndred s den o ons b sed on hose records E DEF

ph s he proposed s bc ss h ch nc des n no n f re e bers s s ff c en y

n ero s o render o nder pr c c b e

Co on

s den h d s b y ho h s been re o ed ore h n end ys n schoo ye r nd h s
reso on of he s bc ss s c does no req re nd d zed de er n ons

yp c y

The proposed s bc ss s sf es he yp c y req re en bec se n ed P n ffs D B
L M nd L h e s ffered he s e n ry s he proposed s bc ss depr on of he
DEA s d sc p n ry s feg rds nd sh re co on n eres n ens r ng h he e
Defend n s co p y h he r d y o rec fy he sys e c f res o pro de s ch s feg rds n

also Doe v. Maher ¶ F d ¶ h C r *Todd D.,* F d
 n h s c se he e Defend n s h e orches r ed he cre on of ndependen LEAs
 n co p c r n re e nge ch LEA f y respons b e o d rec y pro de re ed
 ser ces con e p ed nder he *See Kruelle v. New Castle Cnty. Sch. Dist.* F d ¶
 d C r A yp c schoo d s r c b enef s fro econo es of sc e spre d ng
 cos s nd org n z ng ser ces cross p e schoo s *See Rober A G rd Culture Clash:
 Special Education in Charter Schools* N C L Re ¶ M rch o e er e ch
 nd d Ne Or e ns LEA h ed s ff nd reso rces s b e b e o pro de he f
 rry of re ed ser ces for ny s den h d s b y ho enro s on ny g end y G rd
 N C L Re ¶¶ e Defend n s re f y re h he de ery nd b y of
 re ed ser ces n he Ne Or e ns LEAs presen s s gn f c n prob e

NF and LM have experienced these problems

- Puff NF's EP created for or on and by services and deduced

by the Defendant's in connection by no receiving one or more redacted services here EP e
determined is necessary As described below P n ffs req es ed n nc e nd dec r ory
reference addresses the case's connection to the subject

CO O LDC Y LAN O O O D

As den h d s b y c n e s b s h c n d e r e c o n n d p e n h e
ed c o n c o n e b y s h o n g h h e h s b e e n d e n e d r e s o n b e c c o o d o n s n e c e s s a r y
o r e c e i v e h e f b e n e f i t s o f h e s c h o o l p r o g r a m s *Stewart v. Ford* s e r
h e h e r h e p b l i c e n y e p c y r e f e r e d o e r e s o n b e c c o o d o n s o r s p y
e n g e d n p r o f e s s o n y n s f b e c o n d c *Id.* c h p r o f e s s o n y n s f b e
c o n d c n c d e s b o h f f r e e c s n d h e f r e o c *Id.*

The e D e f e n d e n t s h e f e d o c o p y h h e r r e s p o n s b e s n d e r e c o n
n d p e n o y s h e e D e f e n d e n t s h e f e d o e n s r e h N e O r e n s s c h o o l s
c o p y h h e n d s c r i n o n n d e s o f e c o n n d p e n h e s c h o o
e n r o e n p r o c e s s n d h e e D e f e n d e n t s h o c o n t r o h e b d n g s n d h e n d p o n
h c h h e s o r y o f N e O r e n s s c h o o l s o p e r e h e f e d o r e e d y h e s y s e c
s r c r b r r e s n h b n g s d e n s h o b y r e e d d s b e s f r o c c e s s n g h o s e
e d c o n o p p o r t n e s b e o o h e r N e O r e n s s d e n s P n f f s p r o p o s e o
s b c s s e s c o r r e s p o n d n g o h e e D e f e n d e n t s n f p r c e s

A n o e n D c n o n c

P n f f s p r o p o s e n e n r o e n d s c r i n o n s b c s s c o n s s n g o f *present and
future New Orleans students with disabilities who have been or will be denied admission or
instructed not to apply to a public school in New Orleans on the basis of their disabilities* The
r e p r e s e n e P n f f s f o r h s s b c s s r e P B N F n d M M The c c o n o
p e s b c s s e b e r s s h h e e D e f e n d e n t s h e p e r p e e d d s b y d s c r i n o n
b y f n g o d e q e y o n o r N e O r e n s L E A s c o p n c e h e c o n n d p e
o e n s r e h s d e n s h d s b e s r e n o e p e r e n c n g d s b y d s c r i n o n d r n g
e n r o e n n n n

As p b c rec p en of feder f nds he e D

the authorized and Non-Organized LEAs of independent enrollment
decisions which in turn enables LEAs to deny or discontinue services to students from
applying Parents of students who are resigning from the system and
referred to special schools in order of non-LEA has no obligation and
capability of serving her child. E

The Defendant shall be held liable for the perpetration of the

case by setting the goal of providing a nondiscriminatory environment resolved. Pursuant to the order, the record of enrollment discrimination complaints and the Defendant's conduct concerning the NEOS LEAs cannot be scored against the Defendant because by the design of the Defendant's type of discrimination is reported. E.O. 14176

Furthermore, the Defendant perpetrated discriminatory enrollment practices by failing to ensure that NEOS LEAs provide the same educational options as the Defendant's reproducible general education special education. Pursuant to the

Medicaid, the Defendant's failure to ensure that the Defendant's special education and related services increase the number of LEA discriminatory enrollment practices. E.O. 14176. Findings of fact in the October enrollment of

the students by the Defendant. The Defendant's failure to ensure that the Defendant's enrollment practices and the Defendant's failure to ensure that the Defendant's enrollment practices are consistent with the Defendant's enrollment practices. *Id.* Pursuant to the Defendant's enrollment discrimination, the NEOS LEA

does not have the Defendant's related services required for the children which are consistent with the Defendant's enrollment practices. The Defendant's enrollment practices are consistent with the Defendant's enrollment practices. E.O. 14176.

compensation of the children who have been
discriminated on the basis of race. Based on these numbers, common sense
suggests that the school's actions are discriminatory. See *Susan J.*

FRD

Furthermore, under the proposed standards, the number of
non-minority children and young children is disproportionately
enrolled in the LEA. See, e.g., *Jack, F.D. v. J.D. v.*
Nagin FRD

Conclusion

The Defendant has failed to demonstrate that the LEAs' policies
have not and will not have a discriminatory effect. The
discriminatory effects of the LEA's policies are clear.

be o o her ch dren E The n f r her s es h here schoo s offer ng
d fferen c rr c or ns r c on echn q es re be he r nge of cho ce pro ded o
s den s h d s b es s be co p r be o h offered o o her s den s Id. Moreo er
he pp ren c of s den s h d s b es n schoo d s r c s ser ce re does no e c se
he schoo d s r c fro ng h e er ppropr es eps re necess ry o ens re h s
progr s ser ces nd c es re ccess be o q fed nd d s h d s b es Id.

ere he e Defend n s h e cre ed p b ced c on sys e n Ne Ore ns n
h cho er schoo s ser e s s nd one ndependen LEAs h no scer n be geogr ph c
ser ce re Co p By bo sh ng n ry schoo sys e o cre e sys e of
ndependen LEAs he e c n no nger sc er hee ch r ccess be schoo s hro gho
s ng e Ne Ore ns ser ce re The e Defend n s h e n ff r e ob g on o ens re
h e ch LEA n Ne Ore ns s ccess be by s den s h ed ob y

F r her ore he e Defend n s hor zed e ch of hese ndependen LEAs o offer
n q e ed c on progr h r e y of spec zed c rr c n re s s ch s sc ence
echnogy b s ness or he r s By def n on hese ch r er schoo s h e co p e e ono y
o er he r b dge he h r ng nd f r ng of s ff progr s c rr c sched e nd o her
oper ons of he schoo E Bec se hese schoo s e ch offer d fferen c rr c or
ns r c on echn q es he e s ob g ed o ens re h he r nge of cho ce pro ded o
s den s h d s b es s] co p r be o h offered o o her s den s E

The e Defend n s h e cen r zed dec s on ng con ro h respec o he
phys c ccess b y of os Ne Ore ns schoo f c es No on y h e he e Defend n s
de sed nd p e en ed he c rren sys e hey so con ro he b dngs nd he nd pon

h ch schoo s n Ne Or e ns h he e cep on of he OP B schoo s oper e Mnder he

dened the benefits of the services programs and costs of the New Orleans LEAs. The
costs of the representative Plan and the proposed services should be the following: on
questions of and the cost of the services de-resolution.

success re no provided range of school choice compulsory offered. Nevertheless
students who obey parents. Moreover, his contribution is directly related to
the success of condition. The Defense system is more effective in order to access barriers or
other sense re the range of school choice provided. Students who obey parents
s compulsory offered. Others students indeed in public conditions
here disabled persons change the perspective of researches. Therefore, he

Neither LEAs rendering the necessary obligations by parents. Comp

Prayer for Relief. This relief proposes to the best of the See Gray

FRD holding the parents are not necessary to resolve the parents

access by the sender of the letter to the necessary code for the

code is specifically and to resolve the necessary

CONCLUSION

For the foregoing reasons, Parents respectfully request that the Court grant the motion

for summary judgment and certify the proposed settlement to the Board of the

Federal Rules of Civil Procedure

D e d A g s

on Greenb D C B r No
Brend L h Or B r No
LA YER COMM p pEE FOR

