



ABL O-CON N

e

ABBRE A P ON

PREL M NARY P A P EMEN P

PROCEDMRAL PO P MRE

LEGAL P ANDARD

A C ss Cer f c on

N eros y

Co on y

Pyp c y

Adeq cy Of Represen on

R e B

B Mee ng he C ss Cer f c on nd rd hro gh bc sses

ARGMMENT P

P E COMR P OMLD CER P FY PLA N P FF P REE PROPO ED

C LD F ND M BCLA E

A den s n P r ns on bc ss

N eros y

Co on y

Pyp c y

Adeq cy Of Represen on

B

B Response o n er en on bc ss

N eros y

Co on y

Pyp c y

Adeq cy Of Represen on

B

C P n bc ss

N eros y

Co on y

Pyp c y

Adeq cy Of Represen on

B

ABL O-A O  
CON N D

e





ABL O A O  
CON N D

e

*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.*  
F pp E D N Y

ABL O A O  
CON N D

e

M C

L R      ¶    ¶

L R      ¶

L Re      Ann    ¶

O A o

CFR

¶

CFR

CFR

CFR

CFR

CFR

CFR

Fed R C P

p ss

ABL O A O  
CON N D



L M N A Y A M N

n he fer h of rr c ne r n he Lo s n Dep r en of Ed c on h s

fforded o he r peers ho c d s b es nd hey c n no onger o see n end o he  
e Defend n s neg ec nd n c on

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  
d s b es s ref ec ed n P n ffs se en proposed s bc sses E ch s bc ss con ends h  
s ng e po cy or pr c ce of he e Defend n s h s res ed n despre d o ons of r gh s  
g r need by he DEA ec on or p e P n ffs respec f y req es h he Co r  
cer fy he r proposed s bc sses

**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 number of persons involved and severity  
of the injury. See, e.g., *Lane v. Kitzhaber*, 544 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  
de ons r es he ngness nd b y o e n c e ro e n nd con ro he g on nd  
h no conf c s of n eres e s ] be een he pr psn b

r bo boo g ▼ ▼ g ▼ ▼ r e ed e ns

ss e of c ss cer f c on spec f c y co on y for proposed c ss of ch dren  
eg ng sys e c f res nd s r c r def c enc es n pe s fos er c re sys e *M.D.*

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

orpho s s per c he co r e pressed ppro for cer f c on hro gh he se of  
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 conditions and needs designations

**Representative Plaintiffs:** P B A D and

**BCLA** Present and future Ne Orleans students who are ending R D and receiving or type charter schools who have been or be required for more than 180 days in school year who have the responsibility of the discipline referrals 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 their 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  
referr for e on nd ens r ng he e on es p ce Lo s n s Ch d F nd  
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.

n he fer h of rrc ne r n Ne Ore ns schoo sys e h s been r nsfor ed  
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 ¶ ph s e 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

o r h E p Rep The e Defend n s h e s ed h ny co n s h ry o  
fro hese s e de den f c on]percen ges re orr so e o s E Th s he o er  
r e of Ne Ore ns s den s h d s b es s ppor s n nference h spec ed c on nder  
den f c on s occ rring nd ffec ng s ze b e pop on of s den s

Add on y s den s n Ne Ore ns r ns on b e een LEAs ery h gh r es E  
O er LEAs s e s of he r s den pop on r ns on o b e een  
he nd he schoo ye rs e n ng h hey e her enro ed n ne LEA  
or ere s p y no enro ed n Ne Ore ns p b c schoo o e schoo s repor ed p r c r y  
h gh r ns on n bers For e p e ohn McDonogh Ch r er choo ppro e y  
s den s d d no reenro nd oseph C r Ch r er choo ppro e y  
s den s d d no re enro Id B sed on he n ber of  
n den f ed s den s n Ne Ore ns nd he n ber of ch dren ho r nsfer b e een LEAs  
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 Network system. The representative  
cases involving the Commission's receipt of the Commission's

the heretofore Defendant's efforts to provide and enforce Child Welfare  
policy provisions regarding the child's best interests. Network's  
school records are not LEAs' confidential records.

the heretofore Defendant's efforts to provide and enforce the Child  
Welfare policy provisions regarding the child's best interests are not  
confidential records.

The Defendant's efforts to provide comprehensive Child Welfare policy for  
Network's decentralized structure are in violation of the Commission's  
cases. See *Wal-Mart*, *C* see also *M.D.* *F* *d* holding that  
the pattern or practice of agency concealment of records for  
deficiency in the agency's sufficient to generate a Commission's

Furthermore, the Commission's actions do not require the  
determination of the Commission's efforts for specific reasons. Rather, the proposed  
efforts have suffered the same result as they have been deprived of the opportunity to  
confidential records regarding requests because no one else is responsible for  
occurrences in the network. It is not an order of the Defendant's  
deception of comprehensive Child Welfare policy provisions regarding the  
same one else'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 Amicus are hereby filed in support of the success of the Commissioner's policy on the success of the Defendant's proposed policy in continuation of the IDEA requirements and so comply with the Response to Intervention (RTI) program before receiving an evaluation for special education by the Department of Education. New Orleans students from receiving the special education services which they received under the IDEA.

RTI's general education program to provide research-based interventions for struggling students hoping to respond to the needs of the students. See generally Michael P. v. Dep't of Educ. Fed. Cir. Mos RTI models no other



Despite the DEA's search findings and OEP's guidance on the contrary, Los Angeles policies require students to be 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 not intended for the child being referred to the child's comprehensive and detailed evaluation. LA Board of Education's policy states that the effect of this policy is that the Oregon's standards regarding conditions of enrollment for students with disabilities in the RDP process have been established by the DEA and the requirements for DEA evaluations are the same as the process requirements. LDOE enforces and monitors LEAs' compliance with this policy.

- A March 2010 LDOE newsletter discusses how LDOE has received many inquiries from parents whose children have been diagnosed with a disability and the school district refuses to evaluate the student. The newsletter provides LEAs with information regarding the RDP process so that students show a timely response and progress through the process. The newsletter also provides information on the policy concerning the DEA LDOE's participation in the evaluation process. The newsletter also provides information on the RDP process for the first time.
- LDOE's RDP Coordinator's manual hereinafter referred to as the RDP manual, states that the RDP process requires that the school district and the parent agree on the child's enrollment in the RDP process. The RDP manual also states that the RDP process is not intended for the child being referred to the child's comprehensive and detailed evaluation.
- The RDP manual also states that the RDP process is not intended for the child being referred to the child's comprehensive and detailed evaluation.

The OEP's guidance regarding the RDP process is based on the Board of Education's policy regarding the RDP process. The Board of Education's policy regarding the RDP process is based on the Board of Education's policy regarding the RDP process.

Los Angeles policies require students to be 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 not intended for the child being referred to the child's comprehensive and detailed evaluation.

the inappropriateness of referring to the student for the purpose of specifying  
educational services. E.D. As a result of the R.D.s student's  
inability to understand the order of R.D.s, the R.D.s recognize that  
the delivery of services to the student is not more than E.D.

Considering the health of the children in the proposed services, the R.D.s do not properly  
present the necessary evidence by report from the Los Angeles 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. v FRD v 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 ppropr 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  
cos ec on e g b y process E B son Dep

The e Defend n sh e ho y b d c ed he r on or ng nd co p nce  
respons b es h respec o he proposed s b c ss The e Defend n s on y on or he  
e ness h h ch LEAs co p e e spec ed c on e ons hey do no on or  
he her s den s h d s b es re e er den f ed or oc ed n he f rs p ce E Co  
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 District or have concluded that this proper order reference by Nebraska LEAs on education plans contributes to the system under definition of Nebraska children under the IDEA. The order of the Report of the experiences of the named Parents represent the source of the problem.

•

members undergoing present proceedings

**Conclusion**

The proposed success satisfies the conclusion requirements because success should be concluded on the Defendant's behalf or on behalf of other successful Defendants despite being on notice. Numerous LEAs were not properly reviewed on the basis of conducting DEA operations. This conclusion is based on the Defendant's obligation to ensure the defendant's best interests are defended and achieved. See supra part C. Conclusion serves here defendant's best interests and for your order the proposed conclusion based on her policies and conduct. *N.B. ex rel. Buchanan v. Hamos* LND My

LDOE's failure to order correct systemic success of conclusion. Numerous Defendant's and others receive DEA's Child Fund and expenses the generating profits for defendant. See *Wal-Mart* C. The success is so general conclusion is the single conclusion. Court requires the Defendant's or Numerous LEAs' success of conclusion. Plaintiff's defendant's conclusion Plaintiff's reasons for conducting outrageous DEA operations

**Typical**

Typical success is satisfied because the representative Plaintiff's PBA and possession of the defendant's defense costs. Defendant's open prosecution is not successful. Plaintiff's PBA and Defendant's



### 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 the purpose of

Courts recognize the standard under the applicable provisions of  
the state's constitution for the purpose 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 reasons. LDOE has filed a  
petition for a writ of habeas corpus. As the result of the DEA's motion for summary judgment, LDOE cited the  
R. D. decision in schools for systemic non-compliance with the DEA in the following respects:

-

*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



d sc 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 y

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**

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 b 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 bnef 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-Organizational LEAs or independent enrollment decisions which may be LEAs or deny or discontinue services which are from applying Parents of students who are resigning from the system and reinforced to the schools in order of the LEA has no objection and compliance of serving the child. E

The Defendant shall be held in contempt of court.

case by saying he got of preschool children enrolled in preschool  
by Dr. O'Rourke read the record of enrollment on computer and  
Defendants' conclusions and conceded that the Orleans LEAs cannot  
satisfy the requirements of the IDEA because by design  
the nature of this type of enrollment is reported in the EOPR

Furthermore, the Defendants' alleged enrollment process by  
finding out the Orleans LEAs provide the standard of service  
does not represent a general education specifically by Dr.

The MedConceded that the defendant's enrollment for the by of special  
education and related services which increases the number of LEA enrollment  
process in the MedEOPR. Findings of fact concerning the enrollment of

the students by the defendant's Dr. Medford's correction of the enrollment  
program and the participation of the defendant's Orleans charter  
LEAs. *Id.* Parents seeking enrollment of their children in Orleans charter  
LEAs does not have the related services required for their children which increases the

enrollment for the program parents have no current requirement  
and



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's presence in the  
enrollment or re-enrollment in the Orleans LEA. See, e.g., *Jack, F.D. v. J.D. v.*

*Nagin* FRD

### Conclusion

The Defendant has failed to demonstrate that the Orleans LEAs' compliance  
with the law and the Defendant's proposed program and enforcement policies  
and processes are in compliance with the law.

discrimination on the part of the Orleans Parish School Board. See *Wal-Mart*  
C

**Proposed**

The claims of Plaintiffs PB, NF, and MM regarding the § 504 claim are based on the fact that the Orleans Parish School Board denied equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board. The Orleans Parish School Board's denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). The Orleans Parish School Board's denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). See *supra* p. 1.

**Adequacy of Proposed Remedies**

For the reasons stated *supra*, the Plaintiffs and undersigned counsel firmly believe that the proposed remedies of the § 504 claim and the § 504 claim possess a high probability of success. The Defendants' denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). The Defendants' denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). See *supra* p. 1.

The Defendants have failed to provide any evidence to support their claim that the proposed remedies of the § 504 claim are inadequate. The Defendants' denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). The Defendants' denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). See *supra* p. 1.

**Prayer for Relief**

Plaintiffs request that the Court certify the § 504 claim as a class action on behalf of the students with mobility impairments who have been or will be denied access to the programs and services of a New Orleans LEA as a result of structural or architectural barriers. For purposes of class certification, the Orleans Parish School Board's denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). The Orleans Parish School Board's denial of equal access to the programs and services of the Orleans Parish School Board to the children of the Orleans Parish School Board is a violation of the Rehabilitation Act of 1973, 29 U.S.C. § 7941(a)(1). See *supra* p. 1.



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 pprop r 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  
echno gy 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

Enclosure to the *New Orleans Parents' Guide to Public Schools: Spring 2013*

Edition sponsored by LDOE and the R. D. Sikes Leadership Center

options for students who are parents. See the Appendix of the Guide for a list

of the type of charter schools in New Orleans representing LEAs that are accessible to students

who are parents of type of charter schools in the Parish. The Guide for a list

and cases where there are no R. D. Sikes Leadership Center schools in New Orleans

who are parents of type of charter schools in the Parish.

The experience of the Parent Forum provides an example of how the

Defendants have affected the proposed cases.

- Parent Forum defended under the DEA's standards which provides a non-binding request for the use of the charter schools to other students in different schools where there are no other parents in the neighborhood. On the occasions when the school did not have any experience or other resources equipped to serve the M.M.A. one school, Lafayette Academy M.M.S. other students at the school.

## Ne o y

ph s s b c s s s f f c e n y n e r o s o e o n d e r p r c c b e A c c o r d n g o h e  
e D e f e n d n s d s d e n s n N e O r e n s p b c s c h o o s e r e d e n f e d s  
s d e n s h o r h o p e d c p r e n s n d e r h e D E A n d n d d o n s d e n s e r e  
d e n f e d s s d e n s h p e d s b e s n d e r h e D E A s c h s r e p r e s e n e P n f f  
M M E p h e p e c s s o n c d e s s d e n s h p h y s c p r e n s h d o n o  
d e r s e y f f e c e d c o n p e r f o r n c e h s q f y n g h e s s d e n s h d s b e s  
n d e r e c o n b n o n d e r h e D E A n c d n g c h d r e n h o s e h e e c h r s e r s o r

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  
questions of the cost of the services and resources.

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 already accessible 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 respondents.

access by the sender of the message in connection with the

of the service of the respondent.

**CONCLUSION**

For the foregoing reasons, Plaintiff respectfully requests that the Court grant her motion

for summary judgment and certify the proposed settlement as a Rule 68 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 pEE FOR

