

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DC ASSOCIATION OF CHARTERED PUBLIC SCHOOLS, et al.,)	
)	
Plaintiffs,)	
)	Civil Action No. 14-cv-1293 (TSC)
v.)	
)	
DISTRICT OF COLUMBIA, et al.,)	
)	
Defendants.)	

UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF AS AMICI CURIAE

The 21st Century School Fund; Senior High Alliance of Parents, Principals, and Educators (“S.H.A.P.P.E.”); Mary Filardo; Matthew Frumin; Terry Goings; Ron Hampton; Faith Gibson Hubbard; Cathy Reilly; Sharona Robinson; Victor Reinoso; Pedro Rubio; Nancy Sarah Smith; Stephen Smith; Eboni-Rose Thompson; Martin Welles; and Suzanne Wells (collectively “Amici Curiae”) through counsel, respectfully requests permission to file the attached memorandum as amici curiae in support of the District of Columbia’s motion to dismiss the complaint in this action. Plaintiffs DC Association of Chartered Public Schools, et al. and defendants District of Columbia, et. al. have consented to the filing of this brief.

Counsel for Amici Curiae have reviewed plaintiffs’ complaint in this action and can assist the Court in resolving key issues due to amici’s unique perspective. Amici Curiae include organizations and individuals throughout the entire city who are leaders in the effort to ensure quality public education in the District of Columbia. Each of these organizations and individuals bring many years of experience and deep involvement dealing with the D.C. public education funding issues presented by this case. The information included in the attached brief represents the collective knowledge and perspective that Amici Curiae bring to the table.

Organizations participating as Amici Curiae are:

The 21st Century School Fund is a nonprofit organization founded in 1994 on the premise that communities are responsible for creating healthy, safe, and educationally appropriate learning environments. The organization is dedicated to building the public will and capacity to modernize public school facilities so they support high quality education and community revitalization. The organization is a well-respected and relied-upon force in the District of Columbia on public education, particularly related to facility planning and capital budget issues.

S.H.A.P.P.E. is an organization of public high school parent-leaders, concerned educators, and principals in the District of Columbia. S.H.A.P.P.E. works to promote an equitable standard of resource distribution amongst District of Columbia schools; expand educational opportunities for teenagers; develop comprehensive approaches to safety and health in schools; and modernize facilities aligned with sound educational practices.

Individuals, including parents, in the District of Columbia also join this brief as each having a direct interest in the dispute. These individuals are:

- Mary Filardo, 21st Century School Fund Executive Director
- Matthew Frumin, Advisory Neighborhood Commissioners 3E Chair, former District of Columbia Public Schools (“DCPS”) Parent
- Terry Goings, School Reform Now Board Member
- Ron Hampton, Family and Community Resource Center Director, Roosevelt High School PTA former President
- Faith Gibson Hubbard, Parent, Ward 5 Council on Education President

- Cathy Reilly, S.H.A.P.P.E. Executive Director, Ward 4 Education Alliance
Founding Member
- Sharona Robinson, Ballou High School PTSA President, Ward 8 Education
Council Secretary
- Pedro Rubio, DC Latino Caucus Board Member, Ward 4 Education Alliance
Founding Member
- Nancy Sarah Smith, Takoma Education Campus PTO, Ward 4 Education Alliance
Founding Member
- Stephen Smith, Takoma Education Campus LSAT and PTO Treasurer, Ward 4
Education Alliance Founding Member, DCPS Grandparent
- Victor Reinoso, former Deputy Mayor of Education, DCPS Parent
- Eboni-Rose Thompson, Ward 7 Education Council Chair, Advisory
Neighborhood Commissioners 7F Chair
- Martin Welles, Esq., Amidon-Bowen PTA President, DCPS Parent, Public
Charter School Parent
- Suzanne Wells, Capitol Hill Public Schools Parent Organization Founder, DCPS
Tyler Elementary Parent

Accordingly, Amicus Parties request leave to file the attached amicus brief.

Dated: October 24, 2014

Respectfully submitted,

/s/ Roderic V.O. Boggs

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