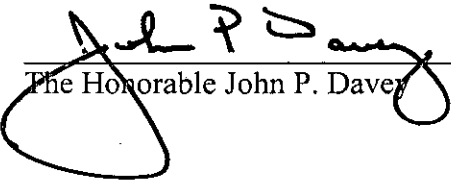


IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY

NALDA ROZON, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. CAL19-19310
)	
PRINCE GEORGE'S COUNTY BOARD OF)	
EDUCATION, <i>et al.</i> ,)	
)	
Defendants.)	

ORDER OF COURT

Upon review of the parties' Joint Stipulation Regarding Plaintiffs' Motion for Temporary Restraining Order and for the reasons stated therein, the Court converts Plaintiffs' request for a temporary restraining order, subject to Defendants' compliance with the terms therein, to a request for preliminary injunctive relief. Additionally, the Court sets the following deadlines for the resolution of Plaintiffs' Motion for Preliminary Injunction. On or before June 28, 2019, Defendants shall file any opposition to Plaintiffs' Motion. On or before July 12, 2019, Plaintiffs shall file any Reply in Support of their Motion. The parties shall appear before the undersigned on July 18, 2019, at 9:00 a.m., for oral argument as to whether the Court shall grant Plaintiffs' request for injunctive relief.

 6-17-19

The Honorable John P. Davey

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY

NALDA ROZON, *et al.*,

Plaintiffs,

v.

PRINCE GEORGE'S COUNTY BOARD OF
EDUCATION, *et al.*,

Defendants.

Case No. CAL19-19310

**JOINT STIPULATION REGARDING PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER**

Plaintiffs Nalda Rozon, *et al.*, and Defendants Prince George's County Board of Education, *et al.*, agree to the following terms regarding Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction.

Defendants agree to waive all tuition, registration, and related fees for the eight plaintiffs identified in Plaintiffs' Complaint and their respective parents and guardians for enrollment in any core courses during the evening or day sessions of Summer 2019: S.S., S.M., D.G., K.G., D.S., L.C., K.M., and A.H. Additionally, between now and July 18, 2019, Defendants agree to expeditiously and, in good faith, review any requests for waiver of such fees by any other students presently attending the Prince George's County Public Schools who are represented by the undersigned Plaintiffs' Counsel and who are eligible for Free and Reduced Meals, and who seek to enroll in core courses for credit recovery during the evening or day sessions of Summer 2019. The Board's waiver of the fees for Plaintiffs or any other persons similarly situated identified by Plaintiffs' Counsel does not prejudice the Board's right to oppose other waivers in the future or oppose other requests above and beyond the terms, herein. In return, Plaintiffs' Motion for a

Temporary Restraining Order and Preliminary Injunction shall be converted to a Motion for Preliminary Injunction on which oral argument will be presented to the Court on July 18, 2019. In the event that Defendants fail to abide by the terms of this agreement, Plaintiffs may renew their request for a Temporary Restraining Order. In addition, if Defendants decline to waive fees for additional FARMS-eligible students who request fee waivers for credit recovery during Summer 2019, this Stipulation shall not affect the right of those students to seek a Temporary Restraining Order.

The parties agree that Plaintiffs' acceptance of these terms shall not affect their standing or otherwise affect their ability to seek a preliminary or permanent injunction enjoining Defendants' policy of charging students for the repetition of core summer school courses as violative of Article VIII of the Maryland Constitution. Further, it is agreed that the Defendants do not waive, and are not precluded from raising, any objections, defenses, and motions as they deem necessary in defense of any and all claims raised by the Plaintiffs herein or any other Plaintiffs as may assert claims in the future.

The parties also agree to the following briefing schedule regarding Plaintiffs' Motion for Preliminary Injunction. On or before June 28, 2019, Defendants shall file any response to Plaintiffs' Motion. On or before July 12, 2019, Plaintiffs shall file any Reply in support of their Motion. On July 18, 2019, at 9:00 a.m., the parties shall appear before the Court to present oral argument on Plaintiffs' Motion and the Defendants' responses thereto. The parties agree that if, in the interim, any discovery is needed, the parties will work expeditiously and, in good faith, to exchange appropriate and relevant information.

s/Ajmel Quereshi

Ajmel A. Quereshi
CIVIL RIGHTS CLINIC
HOWARD UNIVERSITY SCHOOL OF LAW
2900 Van Ness Street, N.W.
Washington, D.C. 20008
Telephone: (202) 216-5574
Ajmel.Quereshi@howard.edu

Deborah A. Jeon
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MARYLAND
3600 Clipper Mill Road, Suite 350
Baltimore, MD 21211
Telephone: (410) 889-8550
Jeon@aclu-md.org

Richard A. Koffman
Emmy L. Levens
Adam H. Farra
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, N.W., 5th Floor
Washington, DC 20005
Telephone: (202) 408-4600
rkoffman@cohenmilstein.org
elevens@cohenmilstein.org
afarra@cohenmilstein.org

Attorneys for the Plaintiffs

Edmund J. O'Meally
PESSIN KATZ LAW, P.A.
901 Dulaney Valley Road, Suite 500
Towson, MD 21204
Telephone: (410) 938-8800 ext. 6757
Eomeally@pklaw.com

Shauna Battle
PRINCE GEORGES COUNTY PUBLIC
SCHOOLS
14201 School Lane
Upper Marlboro, MD 20772
Telephone: (301) 952-6063
Shauna.Battle@pgcps.org

Attorneys for the Defendants