

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	3:80-cv-00035-TLS-CAN
)	
SOUTH BEND COMMUNITY)	
SCHOOL CORPORATION, et al.,)	
)	
Defendants.)	
_____)	

**MOTION FOR APPROVAL OF
A REVISED STUDENT ASSIGNMENT PLAN AND STIPULATION
OF THE PARTIES REGARDING OTHER CONSENT DECREE ISSUES**

The South Bend Community School Corporation, *et al.*, (“SBCSC” or the “District”), through undersigned counsel, respectively moves the Court for an order approving a revised student assignment plan to replace the plan approved by this Court on August 19, 2002 and approving a stipulation between the parties regarding related issues under the original August 8, 1980 Consent Decree in this case. Developments over the last sixteen years require the modification of the 2002 student assignment plan, and the parties agree that other issues should be addressed in the near term.

Therefore, for the reasons discussed in the accompanying Memorandum in Support, the District respectfully requests the Court to approve the attached student assignment plan and stipulation. Subject to the provisions of the attached stipulation the United States has no objection to this Motion.

Respectfully submitted,

/s/ John W. Borkowski

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 30th day of April, 2018, a copy of the above and foregoing document was filed with the Clerk of Court using the CM/ECF system which sent electronic notification of such filing to all those individuals currently electronically registered with the Court.

/s/ John W. Borkowski