

1 Thomas A. Saenz (SBN 159430)  
2 Juan Rodriguez (SBN 282081)  
3 MEXICAN AMERICAN LEGAL DEFENSE  
4 AND EDUCATIONAL FUND  
5 634 S. Spring Street, 11<sup>th</sup> Floor  
6 Los Angeles, CA 90014  
7 Telephone: (213) 629-2512  
8 Facsimile: (213) 629-0266  
9 Email: tsaenz@maldef.org  
10 jrodriguez@maldef.org

11 *Attorneys for Plaintiffs*

CONFORMED COPY  
ORIGINAL FILED  
Superior Court Of California  
County Of Los Angeles

AUG 22 2017

Sherri R. Carter, Executive Officer/Clerk  
By: Charlie L. Coleman, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

10 **BS 170585**

11 JANE DOE, an individual; K. D., a minor, by and  
12 through her *guardian ad litem*, Jane Doe; L. D., a  
13 minor, by and through her *guardian ad litem*, Jane  
14 Doe; M. D., a minor, by and through her *guardian*  
15 *ad litem*, Jane Doe; EVA DEL RIO, an individual;

16 Plaintiffs,

17 vs.

18 PASADENA UNIFIED SCHOOL DISTRICT;  
19 JUAN RUELAS, in his individual and official  
20 capacities as principal of Madison Elementary  
21 School; MARIA REINA, in her individual and  
22 official capacities; BRIAN MCDONALD, in his  
23 individual and official capacities; ELIZABETH  
24 POMEROY, in her individual capacity; SCOTT  
25 PHELPS, in his individual capacity; PATRICK  
26 CAHALAN, in his individual capacity;  
27 KIMBERLY KENNE, in her individual capacity;  
28 ROY BOULGHOURHIAN, in his individual  
capacity; LAWRENCE TORRES, in his individual  
capacity; ELIZABETH PALOMARES, in her  
individual capacity; and DOES 1 to 10, inclusive,

Defendants.

Case No.

**COMPLAINT AND PETITION FOR WRIT  
OF MANDATE**

- (1) Violation of the Fourteenth Amendment of the U.S. Constitution [42 U.S.C § 1983]
- (2) First Amendment Retaliation [42 U.S.C § 1983]
- (3) Violation of Procedural Due Process under the Fourteenth Amendment of the U.S. Constitution [42 U.S.C § 1983], and Article I, § 7 of the California Constitution
- (4) Race and National Origin Discrimination [Cal. Ed. Code § 220]
- (5) Unruh Civil Rights Act [Cal. Civ. Code § 51]
- (6) Writ of Mandate [Cal. Civ. Code § 1085]

**DEMAND FOR JURY TRIAL**

Judge:

Dept:

1 Plaintiffs parent Jane Doe; students K. D., L. D., and M. D.; and caretaker Eva Del Rio  
2 (collectively "Plaintiffs") complain and allege as follows:

### 3 INTRODUCTION

4 1. This action seeks remedies for Defendants school district and school officials' unlawful  
5 discrimination and civil rights violations at Pasadena Unified School District ("PUSD" or "District")  
6 against Plaintiff students attending District schools, students' mother, and the caretaker of a former  
7 student.

8 2. Defendant principal of Madison Elementary School ("School") Juan Ruelas and  
9 Defendant School employee Maria Reina made immigration enforcement-related threats to mother  
10 and/or caretaker Plaintiffs. Defendants PUSD, its Superintendent, and individual Board Members  
11 failed to investigate Plaintiff Jane Doe's formal complaint concerning Principal Ruelas's threat, as  
12 required under State law and District procedures; instead they gave notice and a copy of the complaint,  
13 and referred the matter to, Principal Ruelas himself, the administrator who made the threat. Principal  
14 Ruelas subsequently retaliated against Plaintiff Jane Doe for having complained about his threat to  
15 PUSD.

16 3. Student Plaintiffs K. D., L. D., and M. D. seek damages from Defendants for violation  
17 of their (1) Equal Protection Rights under the Fourteenth Amendment. Plaintiff parent Jane Doe seeks  
18 damages from Defendants Principal Ruelas and District Community Liaison Palomares for (2) First  
19 Amendment retaliation, and (3) from Defendants PUSD, Ruelas, and McDonald for violation of  
20 procedural due process rights under the United States Constitution and California Constitution.  
21 Plaintiff parent Jane Doe seeks declaratory and injunctive relief for (4) Race and National Origin  
22 Discrimination in violation of Cal. Ed. Code § 220, and (5) violation of the Unruh Civil Rights Act.  
23 Plaintiff caretaker Eva Del Rio also seeks declaratory and injunctive relief for violation of the Unruh  
24 Civil Rights Act. Plaintiff parent Jane Doe seeks (6) a writ of mandamus under Cal Civ. Code § 1085.  
25 Plaintiffs do not seek damages for claims (4) through (6).

### 26 JURISDICTION AND VENUE

27 4. Jurisdiction and venue are proper in this Court because all of the claims alleged here  
28 arose in the City of Pasadena, located in the County of Los Angeles, in the State of California.

**PARTIES**

1  
2           5.     Plaintiff K. D. is a Latina minor and resident of Los Angeles County. At all relevant  
3 times, Plaintiff K. D. attended Madison Elementary School, a school within PUSD. Plaintiff K.D. sues  
4 under a fictitious name.

5           6.     Plaintiff L. D. is a Latina minor and resident of Los Angeles County. At all relevant  
6 times, Plaintiff L. D. attended Madison Elementary School, a school within PUSD. Plaintiff L.D. sues  
7 under a fictitious name.

8           7.     Plaintiff M. D. is a Latina minor and resident of Los Angeles County. At all relevant  
9 times, Plaintiff M. D. attended Marshall Fundamental Secondary School, a school within PUSD.  
10 Plaintiff M.D. sues under a fictitious name.

11           8.     Plaintiff parent Jane Doe is a Latina resident of Los Angeles County. Plaintiff Jane Doe  
12 is Plaintiffs K. D., L. D., and M. D.'s mother and *guardian ad litem*. Plaintiff Jane Doe sues under a  
13 fictitious name.

14           9.     Plaintiff caretaker Eva Del Rio is a Latina resident of Los Angeles County. At all  
15 relevant times, she was caretaker of a child who attended Madison Elementary School, a school within  
16 PUSD.

17           10.    Defendant PUSD is a local education agency and a school district duly organized and  
18 existing under the laws of the State of California. The District is charged with providing a public  
19 education and education-related services to all school-aged children residing within its district  
20 boundaries. PUSD is a recipient of state funds.

21           11.    Defendants Elizabeth Pomeroy, Scott Phelps, Patrick Cahalan, Kimberly Kenne, Roy  
22 Boulghourjian, and Lawrence Torres (collectively, "PUSD Board"), were, at all relevant times,  
23 members of the PUSD Board of Education. The PUSD Board is charged with overseeing PUSD and  
24 securing its compliance with state and federal laws regarding the education of its students. Each  
25 member of the PUSD Board is sued in his or her individual capacity.

26           12.    Defendant Juan Ruelas was, at all relevant times, principal of Madison Elementary  
27 School in PUSD. As principal of the School, he was charged with managing the day-to-day operations  
28 at the School, and overseeing PUSD's compliance with state and federal laws regarding the education

1 of its students in educational activities at Madison Elementary School. Principal Ruelas is sued in his  
2 official and individual capacities.

3 13. Defendant Superintendent Brian McDonald was, at all relevant times, the  
4 superintendent of PUSD. As superintendent of the District, he is charged with overseeing PUSD and  
5 ensuring its compliance with state and federal laws regarding education of its students. Superintendent  
6 McDonald is sued in his individual and official capacities.

7 14. On information and belief, Defendant Maria Reina was, at all relevant times, employed  
8 as a "Noon Aide" at Madison Elementary School by Defendant PUSD.

9 15. On information and belief, Defendant Elizabeth Palomares was, at all relevant times,  
10 employed as a District Community Liaison by Defendant PUSD.

11 16. The true names and capacities, whether individual, corporate, or associate, and the true  
12 involvement of Defendants sued here as Does 1 thorough 10, inclusive, are unknown to Plaintiffs, who  
13 therefore sue these Defendants by fictitious names and will amend this Complaint to show the true  
14 names, capacities, and involvement when ascertained. Plaintiffs are informed and believe and allege  
15 that each of the Defendants designated as a Doe is responsible in some manner for the events and  
16 happenings referred to here, and that Plaintiffs' injuries and damages were in part caused by these  
17 Defendants.

18 **FACTUAL ALLEGATIONS**

19 17. At all relevant times to this action, Plaintiff caretaker Del Rio was a caretaker to a child  
20 attending Madison Elementary School. Plaintiff caretaker Del Rio dropped off the child at the School  
21 as part of her caretaking duties.

22 18. On a weekday during the week commencing August 24, 2015, Plaintiff Del Rio  
23 attempted to drop off the child in her care at one of the School's entrances. When she knocked on the  
24 closed entrance door, Defendant Ruelas opened the door and threatened Plaintiff Del Rio that he would  
25 report her to federal Immigration and Customs Enforcement ("ICE") if she ever knocked on the  
26 entrance door again.

1           19.     On or about August 25, 2015, Plaintiff Jane Doe met with Principal Ruelas and  
2 expressed concern regarding an apparent new School practice that involved throwing away students'  
3 lunches if not consumed in a short period of time.

4           20.     During that meeting, Plaintiff Jane Doe informed Defendant Ruelas that she would file  
5 a formal complaint with the District concerning the School's lunchtime practice if he did not address  
6 her concern.

7           21.     In response, Defendant Ruelas threatened to send ICE to Madison Elementary School if  
8 Plaintiff Jane Doe filed a complaint against him with the PUSD, laughed at her, and then walked away.

9           22.     The events that occurred on or about August 25, 2015 have caused Plaintiff Jane Doe  
10 emotional distress.

11           23.     On or about September 24, 2015, Plaintiff Jane Doe described the events that occurred  
12 on or about August 25, 2015, including Defendant Ruelas's threat to call ICE, to the PUSD Board  
13 during the public comment period of the Board's meeting.

14           24.     On information and belief, Defendants Superintendent Brian McDonald and each  
15 individual member of the PUSD Board witnessed or have knowledge of Plaintiff Jane Doe's  
16 September 24, 2015 comments at the PUSD Board meeting.

17           25.     On or about September 29, 2015, Plaintiff Jane Doe filed a formal complaint under  
18 PUSD Uniform Complaint Procedures with Defendant PUSD (the "District Complaint"); the  
19 complaint alleged race-based discrimination and complained that Defendant Ruelas threatened to send  
20 immigration enforcement to the School if she filed a complaint against him.

21           26.     On or about October 22, 2015, Defendant PUSD's Human Resources office sent  
22 Plaintiff Jane Doe a letter asserting that her District Complaint did not fall within coverage of the  
23 Uniform Complaint Procedures ("PUSD Letter").

24           27.     The PUSD Letter further stated that the District referred Plaintiff Jane Doe's District  
25 Complaint to Defendant Ruelas, the principal whom she complained about; that the District gave  
26 Defendant Ruelas a copy of the District Complaint; and that Defendant Ruelas would contact Plaintiff  
27 Jane Doe shortly.

1           28.    On or about October or November 2015, Plaintiff Jane Doe met with Defendant  
2 Palomares and Defendant Ruelas to discuss Plaintiff Jane Doe’s complaints concerning Defendant  
3 Ruelas.

4           29.    During that meeting, Defendant Palomares asserted that Defendant Ruelas made no  
5 immigration enforcement-related threats to Plaintiff Jane Doe.

6           30.    At the meeting, Defendant Palomares told Plaintiff Jane Doe that she was “defaming”  
7 Defendant Ruelas and that Defendant Ruelas could take action against Plaintiff Jane Doe.

8           31.    Plaintiff Jane Doe left that meeting feeling intimidated, humiliated and emotionally  
9 distressed. On information and belief, Defendants PUSD and principal Ruelas implicitly threatened  
10 legal action against Plaintiff Jane Doe in order to stop her from describing to others Defendant  
11 Ruelas’s threat to call ICE if she complained to the District about him.

12           32.    Prior to the 2015-16 school year, Plaintiff Jane Doe had for years volunteered at  
13 Madison Elementary School without any problems. She had also, for years, participated in family  
14 and/or community engagement events held at the School.

15           33.    In or about October or November 2015, PUSD notified Plaintiff Jane Doe that she  
16 passed a District background check and had been approved to volunteer at the District for the 2015-16  
17 school year.

18           34.    Beginning in or about November 2015, and following Plaintiff Jane Doe’s meeting with  
19 the PUSD representative and Defendant Ruelas, Plaintiff Jane Doe, on multiple occasions, went to  
20 Madison Elementary School and reported to its volunteer coordinator so that she could perform  
21 volunteering duties at the School. In each instance, the volunteer coordinator informed Plaintiff Jane  
22 Doe that a list of approved parent volunteers had not yet been created and that she therefore could not  
23 yet volunteer at the School.

24           35.    Plaintiff Jane Doe observed others volunteering at the School during some of the period  
25 of time during which the School’s volunteer coordinator told Plaintiff Jane Doe that a list of approved  
26 volunteer coordinators had not yet been developed.

1           36.     On information and belief, Defendant Ruelas barred Plaintiff Jane Doe from  
2 volunteering at the School in the 2015-16 school year for having complained to the District about his  
3 threat to call ICE.

4           37.     On or about September or October 2016, Plaintiff Jane Doe reported to Madison  
5 Elementary School's volunteer coordinator and submitted paperwork to renew her permission from  
6 PUSD to volunteer for the 2016-17 school year.

7           38.     On or about September or October 2016, the Madison Elementary School's volunteer  
8 coordinator called Plaintiff Jane Doe and told her that she could not volunteer at the School because  
9 Defendant Ruelas did not want her to volunteer.

10          39.     On information and belief, Defendant Ruelas barred Plaintiff Jane Doe from  
11 volunteering at Madison Elementary School in the 2016-17 school year because she complained to the  
12 District about his threat to call ICE.

13          40.     Plaintiff Jane Doe did not volunteer at Madison Elementary School during the 2015-16  
14 and 2016-17 school years, as she had in prior years, except that during the 2015-16 school year,  
15 Plaintiff Jane Doe volunteered in a distinct program located on Madison Elementary School grounds  
16 because she did not have to report to the School's volunteer coordinator in order to do so.

17          41.     On information and belief, PUSD does not have established procedures for challenging  
18 decisions to bar parents from volunteering at PUSD schools.

19          42.     Commencing in the fall 2015 semester, Plaintiff Jane Doe decreased her participation in  
20 family engagement events at the School to reduce the risk of retaliation or follow-through on  
21 Defendant Ruelas's threat to call ICE.

22          43.     Plaintiff Jane Doe's inability to volunteer at Madison Elementary School and decreased  
23 participation in family and community engagement events at the School because of fear that Defendant  
24 Ruelas may call ICE, have caused her emotional distress.

25          44.     On or about December 22, 2016, during the public comment portion of a PUSD Board  
26 meeting, Plaintiff Jane Doe informed the PUSD Board that she was offended that the District  
27 responded to her complaint about Defendant Ruelas's threat to call ICE to the School by referring her  
28 complaint to Defendant Ruelas, the very principal who was the subject of her complaint.

1 45. Minutes later, Defendant Reina, who, on information and belief, was employed at the  
2 time as a "Noon Aide" at the School, told the PUSD Board that she wanted to call immigration  
3 enforcement on Plaintiff Jane Doe.

4 46. As Defendant Reina stated that she wanted to call immigration enforcement on Plaintiff  
5 Jane Doe, she pointed at Plaintiff Jane Doe and called her by her true name.

6 47. On information and belief, Defendant Superintendent McDonald and each individual  
7 member of the PUSD Board, witnessed or have knowledge of Plaintiff Jane Doe's and Defendant  
8 Reina's comments at the December 22, 2016 PUSD Board meeting, and made no effort to address  
9 Defendant Reina's immigration enforcement statements at the Board meeting.

10 48. Student Plaintiffs K. D., L. D., and M. D. have knowledge of the immigration threat  
11 Defendant Ruelas made to their mother.

12 49. Plaintiffs K. D., L. D., and M. D. have knowledge of the immigration enforcement  
13 comments Defendant Reina made at the December 22, 2016 PUSD Board meeting.

14 50. Plaintiff K. D. has suffered emotional distress as a result of Defendants' actions.

15 51. Plaintiff L. D. has suffered emotional distress as a result of Defendants' actions.

16 52. Plaintiff M. D. has suffered emotional distress as a result of Defendants' actions.

17 **FIRST CAUSE OF ACTION**

18 **Discrimination Against Minors Based on Perceived Immigration Status (Violation of Equal  
19 Protection Clause of the Fourteenth Amendment to the U.S. Constitution and 42 U.S.C. § 1983)**

20 ***Plaintiffs K. D., L. D., and M. D. Against Defendants Ruelas, Reina, Palomares, Superintendent  
21 McDonald, and Each Individual Member of the PUSD Board, in his or her individual capacity***

21 53. Plaintiffs reallege and incorporate by reference all previous allegations.

22 54. Defendants violated the provisions of the Equal Protection Clause of the Fourteenth  
23 Amendment to the U.S. Constitution as articulated in *Plyler v. Doe*, 457 U.S. 202 (1982), and 42  
24 U.S.C. § 1983, which together prohibit discrimination based, in whole or in part, upon a minor's or  
25 minor's guardian's actual or perceived immigration status, by persons acting under color of state law.

26 55. Minor Plaintiffs K. D., L. D., and M. D. are Latina, as is their mother and *guardian ad*  
27 *litem*, Plaintiff Jane Doe.



1           56. Defendants Principal Ruelas, Noon Aide Reina, District Community Liaison Palomares,  
2 Superintendent McDonald, and each individual member of the PUSD Board acted under color of state  
3 law when they treated student Plaintiffs K. D., L. D., and M. D., and their mother Jane Doe differently  
4 based on Plaintiff Jane Doe's perceived immigration status, and discriminated against Plaintiffs K. D.,  
5 L. D., and M. D. in violation of their rights under the Equal Protection Clause of the Fourteenth  
6 Amendment and 42 U.S.C. § 1983.

7           57. The actions of Defendants Ruelas, Reina, Palomares, Superintendent McDonald, and  
8 each individual member of the PUSD Board discouraged K. D.'s, L. D.'s, and M. D.'s participation in  
9 educational activities.

10          58. Defendants Superintendent McDonald and each individual member of the PUSD Board  
11 knew, or should have known, of Defendant Ruelas's and Reina's wrongful and intentional conduct in  
12 violation of Plaintiffs K. D.'s, L. D.'s, and M. D.'s rights.

13          59. Defendants Superintendent McDonald and each individual member of the PUSD Board  
14 knew or should have known that Defendants Ruelas's and Reina's conduct created a substantial risk of  
15 harm to Plaintiffs K. D., L. D., and M. D.

16          60. Defendants Superintendent McDonald and each individual member of the PUSD Board  
17 disregarded that risk by impliedly approving Defendants Ruelas's and Reina's wrongful conduct,  
18 failing to prevent or correct the wrongful conduct, and/or through their own intentional affirmative  
19 conduct.

20          61. The wrongful acts of Defendants Ruelas, Reina, Palomares, Superintendent McDonald,  
21 and each individual member of the PUSD Board caused Plaintiffs K. D., L. D., and M. D. to suffer  
22 injury, damage, loss or harm.

23          62. Defendants Ruelas's and Reina's discrimination subjected Plaintiffs K. D., L. D., and  
24 M. D. to cruel and unjust hardship in conscious disregard for their rights, and was so wretched that it  
25 would be looked down upon and despised by ordinary decent people.

**SECOND CAUSE OF ACTION**  
**First Amendment Retaliation (42 U.S.C. § 1983)**

*Plaintiff Jane Doe Against Defendants Ruelas and Palomares, in his or her individual capacity*

63. Plaintiff realleges and incorporates by reference all previous allegations.

64. Plaintiff Jane Doe engaged in constitutionally protected activity when she expressed her parental concerns about Madison Elementary School's practices, Defendant Ruelas's behavior, and the adequacy of PUSD's response to her complaints, including when she filed the District Complaint with the PUSD.

65. Defendant Ruelas retaliated against Plaintiff Jane Doe, at least in part, because she engaged in protected activity, including by threatening to call ICE to the School and by prohibiting her from volunteering at the School.

66. Defendant Ruelas's acts would likely have deterred a person of ordinary firmness from engaging in the protected activity that Plaintiff Jane Doe engaged in.

67. Defendant Ruelas's actions subjected Plaintiff Jane Doe to cruel and unjust hardship in conscious disregard for her rights, and was so wretched that it would be looked down upon and despised by ordinary decent people.

68. Defendant Palomares retaliated against Plaintiff Jane Doe, at least in part, because she engaged in protected activity, including by asserting that Plaintiff Jane Doe was defaming Defendant Ruelas.

69. Defendant Palomares's acts would likely have deterred a person of ordinary firmness from engaging in the protected activity that Plaintiff Jane Doe engaged in.

70. Plaintiff Jane Doe suffered injury, damage, loss or harm as a result of Defendants Ruelas's and Palomares's acts.

**THIRD CAUSE OF ACTION**  
**Violation of Procedural Due Process Under the Fourteenth Amendment (and 42 U.S.C. § 1983),  
and California Constitution (Article I, § 7)**

*Plaintiff Jane Doe against PUSD, Defendant Ruelas, in his individual capacity, and against  
Defendant McDonald, in his individual and official capacity*

71. Plaintiff realleges and incorporates by reference all previous allegations.

72. The Due Process Clause of the Fourteenth Amendment to the United States

1 Constitution and Article I, §7 of the California Constitution prohibit Defendants from depriving any  
2 person of life, liberty or process without due process of law.

3 73. Plaintiff Jane Doe has a liberty interest in volunteering at Madison Elementary School,  
4 where her children attend school.

5 74. Defendant Ruelas, while acting under color of State law, deprived Plaintiff Jane Doe of  
6 such interest by failing to provide her with any notice of and opportunity to be heard concerning his  
7 decision to bar Plaintiff Jane Doe from volunteering at the School.

8 75. Defendant Ruelas intentionally deprived Plaintiff Jane Doe of her due process rights,  
9 and did so without lawful justification.

10 76. Defendant McDonald, while acting under color of State law, deprived Plaintiff Jane  
11 Doe of her liberty interest in volunteering at the School by failing to provide her with any notice of  
12 and opportunity to be heard concerning Defendant Ruelas's decision to bar Plaintiff Jane Doe from  
13 volunteering at the School.

14 77. Pasadena Unified School District deprived Plaintiff Jane Doe of her liberty interest in  
15 volunteering at the School by failing to provide her with any notice of and opportunity to be heard  
16 concerning Defendant Ruelas's decision to bar Plaintiff Jane Doe from volunteering at the School.

17 78. As a direct and proximate result of Defendant Ruelas's acts, Plaintiff Jane Doe suffered  
18 a loss of liberty interests.

19 **FOURTH CAUSE OF ACTION**

20 **Race and National Origin Discrimination (Cal. Ed. Code § 220)**

21 ***Plaintiff Jane Doe against PUSD***

22 79. Plaintiff realleges and incorporates by reference all previous allegations.

23 80. Defendant PUSD is, and at all relevant times to this action, was a recipient of state  
24 funds.

25 81. Plaintiff Jane Doe is and was, at all material times, Latina and of Latino/Hispanic  
26 national origin.

27 82. Plaintiff Jane Doe was harmed by being subjected to harassment by Defendants Ruelas  
28 and Reina.





1 **JURY DEMAND**

2 106. Plaintiffs demand a trial by jury.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs pray for relief as follows:

5 107. For general damages, according to proof, on each cause of action for which such  
6 damages are available;

7 108. For punitive damages, according to proof, on each cause of action for which such  
8 damages are available;

9 109. For injunctive relief as necessary to:

- 10 (a) Enjoin Juan Ruelas and Maria Reina from making any immigration  
11 enforcement-related threats to any student or parent or caretaker of a student  
12 attending a PUSD school.
- 13 (b) Order PUSD to investigate any complaints alleging threats or inquiries relating  
14 to immigration status.
- 15 (c) Enjoin PUSD from referring any complaints alleging threats or inquiries relating  
16 to immigration status to individuals alleged to have made such threats or  
17 inquiries.
- 18 (d) Enjoin PUSD from providing copies of any complaints alleging threats or  
19 inquiries relating to immigration status to individuals alleged to have made such  
20 threats or inquiries.
- 21 (e) Enjoin PUSD from revealing the identity of complainants alleging inquiries or  
22 threats relating to immigration status to individuals alleged to have made such  
23 threats or inquiries;

24 110. For entry of a writ of mandate directing PUSD to comply with their mandatory statutory  
25 duties alleged in this complaint, including that it investigate the allegations in Plaintiff Jane Doe's  
26 District Complaint;

1           111. For declaratory judgment that the actions complained of in this complaint are unlawful  
2 and violate the equal protection and due process protections of the Fourteenth Amendment of the  
3 United States Constitution;

4           112. For pre-judgment and post-judgment interest according to law;

5           113. For reasonable attorneys' fees incurred in this action on those causes of action for which  
6 such fees are recoverable under the law;

7           114. For costs of suit incurred in this action; and

8           115. For such other and further relief as the Court deems proper and just.

9  
10  
11 Dated: August 21, 2017

MEXICAN AMERICAN LEGAL DEFENSE AND  
EDUCATION FUND, INC.

12  
13   
14 Juan Rodriguez

15 Attorney for Plaintiffs  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

VERIFICATION

I, Jane Doe, declare and say:

1. I am a Plaintiff/Petitioner in the above-entitled action.
2. I have read my portion of the COMPLAINT AND VERIFIED PETITION FOR WRIT OF MANDATE and know the contents thereof.
3. I declare that the same is true of my own knowledge, except as to those matters which are therein stated upon information or belief, are recitations of the law or public records, or which relate to other named Plaintiff/Petitioners, and as to those matters I believe them to be true.
4. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 21, 2017, at Pasadena, California.

*JANE DOE*

\_\_\_\_\_  
JANE DOE  
Plaintiff/Petitioner