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NO. 84362-7

SUPREME COURT OF THE STATE OF WASHINGTON

MATHEW and STEPHANIE McCLEARY, et al.,

Respondents,

v.

STATE OF WASHINGTON,

Appellant.

SUPERINTENDENT OF PUBLIC INSTRUCTION'S AMICUS BRIEF ADDRESSING 2015 LEGISLATURE'S COMPLIANCE WITH *McCLEARY*

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ORIGINAL

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I. INTEREST OF AMICUS CURIAE

Randy Dorn is Washington's Superintendent of Public Instruction, a nonpartisan elected state officer whose constitutional duty is to "have supervision over all matters pertaining to public schools." Const. art. III, § 22. As the State's chief school officer, the Superintendent plays a unique role. He is the sole statewide elected official constitutionally responsible for supervising public education, and he heads up Washington's state education agency, the Office of Superintendent of Public Instruction (OSPI).

The Superintendent has two very specific interests in this case. First, this Court "retain[ed] jurisdiction over this case to monitor implementation of the reforms under ESHB 2261 [Laws of 2009, ch. 548], and more generally, the State's compliance with its paramount duty." *McCleary v. State*, 173 Wn.2d 477, 545-46, 269 P.3d 227 (2012). ESHB 2261 tasked OSPI with specific responsibilities to implement the program of basic education envisioned by ESHB 2261. Laws of 2009, ch. 548. Along with the Office of Financial Management (OFM), OSPI was responsible for convening and staffing technical working groups to develop the details of implementing ESHB 2261. ESHB 2261 § 112(2)(a)-(c). The Legislature and the Quality Education Council (QEC) are responsible for monitoring these working groups, and OSPI and OFM staffed the QEC. ESHB 2261 §§ 112(4), 114(6). OSPI was intimately involved in the recommendation

required by ESSB 2261. In addition, the Superintendent developed a 17-point plan to implement ESSB 2261 and SHB 2776, Laws of 2010, ch. 236. OSPI has unique expertise and it is important that the Court have the Superintendent's point of view.

The Superintendent's second unique interest is his prior participation in this case as amicus curiae. In the Superintendent's Amicus Curiae Brief Addressing Order to Show Cause, dated August 4, 2014, the Superintendent acknowledged that the State had not complied with the Court's Order dated January 9, 2014. However, the Superintendent urged the Court to give the Legislature an opportunity in the 2015 legislative session to comply with the Order. Now the 2015 regular session and three special sessions have come and gone. Having previously asked the Court to stay its hand, the Superintendent believes he has a duty to inform the Court whether the Legislature has made sufficient progress and, if not, what sanctions or other remedial measures the Court should order.

II. ISSUES

1. This Court held the State in contempt for failure to comply with the Court's Order dated January 9, 2014. Were the actions of the 2015 Legislature sufficient to purge the contempt?

2. If the actions of the 2015 Legislature were not sufficient to purge the contempt, what sanctions or other remedial measures should the Court order?

III. ARGUMENT

A. The Legislature's Action Or Inaction In Meeting The Expanded Definition Of Basic Education In ESHB 2261 Must Be Based On Educational Policy

In *McCleary* the Court concluded that "the legislature devised a basic education program to provide the constitutionally required 'education' under article IX, section 1. The program defined the resources and offerings the legislature believed were necessary to give all students an opportunity to meet state standards." *McCleary*, 173 Wn.2d at 537. This Court "agree[d] with the trial court that the legislature provided 'specific substantive content to the word 'education'" in article IX, section 1. *McCleary*, 173 Wn.2d at 523 (internal punctuation omitted).

After the trial court ruled in *McCleary*, the Legislature enacted ESHB 2261 which "expand[ed] the definition of 'basic education' [and] instituted bold reforms to the K-12 funding system [by] adopt[ing] the prototypical school model." *McCleary*, 173 Wn.2d at 506.

Having expanded the definition of basic education in ESHB 2261, the Legislature is constitutionally obligated to implement it, unless there is an educational rationale not to. "The legislature generally enjoys broad discretion in selecting the means of discharging its duty under article IX, section 1, including deciding which programs are necessary to deliver the constitutionally required education." *McCleary*, 173 Wn.2d at 526 (internal punctuation omitted). However, "to ensure that the legislature exercises its

authority within constitutionally prescribed bounds, any reduction of programs or offerings from the basic education program must be accompanied by an educational policy rationale." *Id.* at 526-27. So "the legislature may not eliminate an offering from the basic education program for reasons unrelated to educational policy[.]" *Id.* This rationale applies equally to the Legislature's refusal to adequately fund a program, which is a back handed way of eliminating it. To eliminate or refuse to fund a program of basic education, the Legislature "must show that a program it once considered central to providing basic education no longer serves the same educational purpose or should be replaced with a superior program or offering." *McCleary,* 173 Wn.2d at 527.

B. The 2015 Legislature Did Not Make Satisfactory Progress In Implementing ESHB 2261

Although the Legislature once again failed to prepare a complete plan as required by the Court's January 9, 2014, Order, it did make some progress in implementing ESHB 2261.[1]

The Legislature deserves credit for the steps it has taken. But they are too small for the task at hand. The Legislature has not made satisfactory

[1] As explained in the 2015 Report to the Washington State Supreme Court by the Joint Select Committee on Article IX Litigation (Leg. Rpt.), the 2015 Legislature enhanced statutory formulas for material, supplies, and operating costs in the 2015-16 school year, reduced class size in grades K through 12, provided funding for pupil transportation, and provided funding for voluntary all-day kindergarten. Leg. Rpt. at 4.

progress in enacting the basic education reforms required by ESHB 2261.

1. The Legislature Failed To Address Significant Staffing Needs

In *McCleary* this Court was satisfied that staffing levels were inadequate to provide basic education. *McCleary*, 173 Wn.2d at 532 ("[T]he Quality Education Council likewise found that funding studies have already confirmed that our state pays for too few instructional and operating staff[.]" (internal punctuation omitted)). In SHB 2776 the Legislature set out staffing for the prototypical school. SHB 2776 § 2(4)-(6). However, the staffing for the prototypical school was *revenue neutral*. *See* SHB 2776 § 1 (providing that the numeric values adopted in the prototypical school funding formula represent the translation of 2009-10 state funding levels for the basic education act into the formula's funding factors).

Except for grades K through 3, staffing levels for certificated and classified staff remain woefully inadequate. For example, in 2011 class size for grades 4 through 6 was 27 students per certificated staff. For grades 7 through 8 it was 28.53. For grades 9 through 12 it was 28.74. Laws of 2011, ch. 50, § 502(2)(c)(i) (2011). The 2015 operating budget was based on *exactly the same class sizes*. Laws of 2015, ch. 4, § 502(2)(c)(i)(A)-(ii)(A). These are the same class sizes that were set out in SHB 2776's revenue neutral prototypical school values—representing staffing levels that this

Court found unconstitutionally inadequate in *McCleary*.

Classified staff is also inadequate. For example, a prototypical elementary school has 400 average annual full-time equivalent students in grades kindergarten through six. ESHB 2261 § 106(3)(b)(iii). For each prototypical elementary school SHB 2776 allocated .936 teaching assistants, 2.012 office support and noninstructional aides, and 1.657 custodians. SHB 2776 § 2(5). The QEC provisionally recommended (subject to the completion of the Compensation Technical Working Group) that the State funded classified staff allocated to the prototypical elementary school be increased to provide 1.195 teaching assistants, 3.22 office support and non-instructional aids, and 3.524 custodians. Quality Education Council Report to the Legislature, January 15, 2011, at 9 (available at http://www.k12.wa.us/qec/). For elementary, middle, and high schools, the QEC recommended a substantial increase in classified staff. *Id.*

The Legislature never seriously considered this recommendation and, today, the prototypical school staffing values for classified staff are identical to the revenue-neutral values established in SHB 2776.

The real world consequences of the Legislature's continued failure to acknowledge school districts' actual staffing needs are manifest. In the 2014-15 school year, for example, Highline School District employed 1,411.6 staff units to provide basic education services to children—103.6

more FTEs than the State's allocation for basic education programs.[2] The additional basic education allocation provided in the 2015-17 operating budget to implement SHB 2776 just made a small dent in that funding gap: the budget will provide State-allocated salary to Highline School District for only an additional 37.1 FTE, a mere 7.7 percent of the district's total basic education units.

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[2] State funded units and salary are based on June 2015 Apportionment for 2014-15 school year, available at http://www.k12.wa.us/safs/Reports.asp., "Prior Months' Apportionment Reports." The district's staffing values can be found at the "ESD 121" link for the month of June, file number 17401. Report 1191ED, Report 1191CTE, Report 1191MSCTE, and Report 1191SC identify the school districts' state-funded values. The following chart describes the district's values:

HIGHLINE	CIS	CAS	CLS	Total
1191ED	843.4	69.0	294.7	1207.1
1191CTE	41.9	3.6	15.0	60.5
1191MSCTE	5.4	0.5	1.9	7.8
1191SC	23.4	2.0	7.2	32.6
Total Apportionment	**914.2**	**75.0**	**318.8**	**1308.0**
S275	962.6	69.8	379.2	1411.6
Above allocation	**48.4**	-5.3	**60.4**	**103.6**

The "S275" values are the actual units and salary the district provided to OSPI in S275 personnel summary reports, based on the 2014-15 school year as of January 19, 2015. *See* http://www.k12.wa.us/safs/PUB/PER/1415/ps.asp (Tables 34, 36, and 38).

2. The Legislature Failed To Address Significant Compensation Needs

McCleary concluded that "[s]ubstantial evidence at trial also showed that the State consistently underfunded staff salaries and benefits. Testimony revealed that the State allocation for salaries and benefits fell far short of the actual cost of recruiting and retaining competent teachers, administrators, and staff." *McCleary*, 173 Wn.2d at 535-36. In ESHB 2261 the Legislature understood that "continuing to attract and retain the highest quality educators will require increased investments" and the Legislature declared its intention to "enhance the current salary allocation model[.]" ESHB 2261 § 601(1).

The Legislature did not follow through on the commitment to enhance staff compensation. In 2012 the Compensation Technical Working Group recommended that the starting salary for a teacher with a B.A. and no experience be raised to $48,687. Compensation Technical Working Group Final Report, June 30, 2012, at 13 (Compensation Rpt.).[3] The 2015-17 Operating Budget allocates only $35,069 to pay the same teacher. Laws of 2015, ch. 4, § 503(4)(a). The Working Group also recommended that a teacher with an advanced degree, a professional/continuing certificate and nine years of experience be paid $81,775. Compensation Rpt. at 18. In

[3] Available at http://www.k12.wa.us/Compensation/.

2015-17, the salary allocated for a more experienced teacher with a Ph.D. and 16 or more years of experience is $66,099. Laws of 2015, ch. 4, § 503(4)(a). The 2015-17 certificated teacher salaries are nowhere near the salaries recommended by the Working Group. Today certificated teachers' salaries allocated on the grid are only a few thousand dollars more than the salaries in the 2011 Operating Budget. For example, in 2011 the allocation for the beginning teacher was $33,401. In 2015 the allocation for the same teacher was $35,609. This is true for all of the salaries allocated in the grid. Compare the 2011-12 Operating Budget (Laws of 2011, ch. 50, § 503(4)(a)) with the 2015-17 Operating Budget (Laws of 2015, ch. 4, § 503(4)(a)).

To make up for the low pay allocated by the Legislature school districts are forced to pay certificated teachers additional salary funded through local excess levies. Data collected by OSPI from school districts shows how stark the disparity remains. The Preliminary School District Personnel Summary Reports for the 2014-15 School Year (2014-15 Rpt.) provides a snapshot of the school districts staffing and compensation, among other things. For example, the Legislature allocated the Highline School District an average of $49,498 for certified instructional staff in basic education programs. The district actually paid an average of $61,499.

2014-14 Rpt., Table 34, p. 2.[4] For the Bellevue School District the average salary allocated by the Legislature was $51,165. The average salary paid by the district was $68,826. *Id.* With rare exceptions the average total salary paid by school districts is greater than the average base salary allocated by the Legislature. 2014-15 Rpt., Table 34.

The problem is just as bad for certificated administrative and classified staff. The Working Group's 2011-12 study shows that the total average compensation for this staff was substantially more than the funds allocated by the Legislature. For example, the Legislature allocated an average of $58,175 for a principal. School districts paid an additional salary of $43,685 for a total of $101,860. For custodians the Legislature allocated an average of $31,699. The average additional salary paid by local school districts was $5,070, for a total of $36,769. For classified staff in technology the State allocated average was $31,699. The school districts paid an additional $23,249, for a total of $54,948. Compensation Rpt., Ex. 2, p. 19. For every position of certificated administrative staff and classified staff, the Working Group found that school districts are paying more that the Legislature allocates. *Id.* The disparity in the Working Group's 2011-12 study remains today. For example, in the Highline School District the

[4] Available at http://www.k12.wa.us/safs/PUB/PER/1415/ps.asp.

average salary the district paid for classified employees was $9,523 higher per State-funded FTE. And, most stark of all, district administrators were paid on average $101,941–$41,695 more per administrator than the State provided.[5] There can be no doubt that the Legislature failed to follow through on its commitment in ESHB 2261 to "enhance the current salary allocation model[.]" ESHB 2261 § 601(1).

3. The Legislature Failed To Enact Local Excess Levy Reform

In *McCleary* the Court concluded that the State had "consistently failed to provide adequate funding for the program of basic education[.] To fill this gap in funding, local districts have been forced to turn increasingly to excess levies[.]" *McCleary*, 173 Wn.2d at 529. But "the State cannot discharge its funding obligations by relying on local excess levies[.]" *McCleary*, 173 Wn.2d at 527. As of today the Legislature has done nothing to address school districts reliance on special levies to fund basic education. *Supra* at 7, 9-11.

The Legislature has actually made the problem worse by authorizing a COLA for school district staff of three percent for the 2015-16 school year (1.2 percent of which is a one-time increase), and 1.8 percent for the 2016-

[5] State funded units and salary based on June 2015 Apportionment for 2014-15 http://www.k12.wa.us/safs/Reports.asp. District actual units and salary from personal summary reports based on 2014-15 data submitted by school districts as of January 19, 2015; Table 34, 36, and 38. http://www.k12.wa.us/safs/PUB/PER/1415/ps.asp.

17 school year (0.6 percent one-time increase). SSB 6052 § 504(1). For certificated teaching staff this was done by increasing the Table of Base Salaries for Certificated Teaching Staff by three percent. For example, in the 2014-15 school year a beginning teacher with a B.A. was allocated $34,048. Laws of 2013, ch. 4, § 503 (4)(a). For the 2015-16 school year that teacher's allocation was increased by three percent to allocation of $35,069. Laws of 2015, ch. 4, § 503(4)(a).

There are two problems with the COLA. First, it only applies to the salary allocated by the Legislature in the 2015-17 Operating Budget. But school districts almost always pay staff more than the Legislature allocated. *Supra* at 9-11. Because salaries are collectively bargained with school districts the COLA for the additional salary necessarily comes from district excess levies. For example, for certified instructional staff in basic education programs for the Highline School District the average base salary provided by the Legislature was $51,988. This sum for the 2015-16 school year would include the three percent COLA. 2014-15 Rpt., Table 34, p. 2. However, the total average salary was $65,423. *Id.* The difference between the average salary allocated by the Legislature and the average salary paid is $13,435 ($65,42-$51,988). The school district must use local levy funds if it is to pay the three percent COLA on the $13,435.

Second, school districts employ more staff than the Legislature has

identified in the prototypical school model (*supra* at 6-7). For this staff the Highline School District would have to pay the three percent COLA on the entire $65,423. OSPI estimates that the COLA will cost school districts an additional $70.1 million for 2015-16 school year beyond what the Legislature has allocated.[6] This additional cost will have to be paid from district excess levies.

The Legislature must address excess levy reform to comply with the State's duty under Article IX, section 1 "to make ample provision for the education of all children residing within its borders[.]" Levy reform, however, is also required as a matter of equity. As the Court observed in *McCleary*, "[d]istricts with high property values are able to raise more levy dollars than districts with low property values, thus affecting the equity of a statewide system." *McCleary*, 173 Wn.2d at 528. On the other hand, "property-poor districts, even if they maximize their local levy capacity, will often fall short of funding a constitutionally adequate education." *Id.* Current use of excess levies means that rich districts give their children a greater educational opportunity than poor districts. Equity does not mean

[6] State funded units and salary are based on June 2015 Apportionment for the 2014-15 school year, available at http://www.k12.wa.us/safs/Reports.asp. District actual units and salary from personnel summary reports based on 2014-15 school year data submitted by school districts as of January 19, 2015; Table 34B, 36B, and 38B used to incorporate district other staff units. *See* http://www.k12.wa.us/safs/PUB/PER/1415/ps.asp.

that school districts must get the same amount of money. *Fed. Way Sch. Dist. 210 v. State*, 167 Wn.2d 514, 526, 219 P.3d 941 (2009). But it does mean that *all* students must have an equal opportunity for successful achievement, without distinction on account of race, color, or caste. Const. art. IX, § 1.

4. The Legislature Failed To Provide Adequate Funding For Basic Education From A Regular And Dependable Source

The Legislature failed to address the greatest need of all in complying with *McCleary*: provide adequate funding of basic education from a regular and dependable source. The Legislature is not providing school districts with enough revenue to provide basic education. The first recommendation by the QEC was that "the Legislature should allocate at least 50% of any new state revenue to the implementation of the basic education program as established in ESHB 2261." Quality Education Council, Initial Report to the Governor & Legislature, dated January 13, 2010, at 2 (available at http://www.k12.wa.us/qec/).

School districts are paying certificated teachers, administrative staff, and classified staff substantially more than the Legislature allocates. *Supra* at 9-11. The reforms promised in ESHB 2261 will also require more staff than the Legislature has allocated. *Supra* at 5-6.

The reforms in ESHB 2261 cost money and the Legislature needs to

allocate more money to do the job. And the revenue must come from "regular and dependable tax sources". *McCleary*, 173 Wn.2d at 527-28. The Superintendent developed a 17-point plan to implement ESSB 2261 and SHB 2776. *Infra* at 15-17. The Superintendent estimates his plan will cost an additional $7,717,811.175 per biennium starting in fiscal year 2019.[7] The Superintendent's estimate may be high or it may be low, but it illustrates the point that the Legislature must put more money into funding basic education.

C. The Legislature Needs To Address The Required Program Of Basic Education

The Court's Order dated January 9, 2014, required the State to file a complete plan for implementing each area of K through 12 education identified in ESHB 2261 and SHB 2776. Order dated January 9, 2014 at 8. Despite its assurance to the Court that the 2015 regular session would offer up a "grand agreement" to fix the State's unconstitutional K through 12 finance system, the Legislature has not complied with this Order. It has not submitted a plan.

1. The Legislature Needs To Address All The Requirements Of ESHB 2261 And SHB 2776

While the Legislature has not adopted a plan the Superintendent has

[7] *See* http://k12.wa.us/Communications/FullyFundPlan/PlanCostTable.pdf.

proposed a 17-point plan to implement the *McCleary* reforms. *See* http://k12.wa.us/Communications/FullyFundPlan/default.aspx. The plan includes reducing class size in grades 4 through 12, hiring additional support staff, funding professional development for teachers, funding teacher mentors, and increasing the salaries for certificated and classified staff.

The Superintendent's plan is important for four reasons. First, the plan addresses all the elements of the recommendations and values identified in the study by Professors Picus and Odden, the QEC, and the Compensation Technical Working Group. Second, the plan is evidenced-based, tying each recommendation to an education-related rationale. Third, the plan sets out the realistic costs of implementing full funding of basic education. Fourth, the plan recognizes the challenges in hiring qualified staff and building adequate facilities, and accordingly extends the time for complete compliance to the 2020-21 school year.[8]

The Superintendent presented his plan to the Legislature but it did not receive serious consideration. The Legislature was under no obligation

[8] In *McCleary* the Court "retain[ed] jurisdiction over the case to help ensure progress in the State's plan to fully implement education reforms by 2018." *McCleary*, 173 Wn.2d at 547. However, the 2018 deadline was not based on Article IX, section 1; it was based on the Legislature's intention "to implement the details of ESHB 2261 through a phased-in approach as recommended by the QEC, with full implementation by 2018." *McCleary*, 173 Wn.2d at 508. In the Superintendent's view, it will take until the 2020-21 school year to implement his plan.

to adopt this plan, and they are free to take a different approach. However, the Legislature must address each of the recommendations and values by Picus and Odden, the QEC, and the Compensation Working Group. ESHB 2261 set up a process for the Legislature to thoughtfully consider expert advice when reforming basic education; it cannot simply disregard the advice.

While the Legislature must consider the expert advice, it is free to weigh the various reports differently than the Superintendent has. For example, while the Picus and Odden report concluded that lower class sizes in grades 9 through 12 are a best practice, the Legislature might conclude that the current class sizes for grades 9 through 12 are adequate. But the Legislature must do something. It cannot simply ignore the problem or the evidence. If the Legislature concludes that the current 9 through 12 class sizes are adequate, it is important for the Legislature to set out an education related rationale behind the decision. But the Legislature must take action.

2. If The Court Adheres To The 2018 Deadline, Time Is Of The Essence, A Special Session Of The Legislature Is Necessary

In *McCleary*, the Court adopted the Legislature's self-imposed deadline of 2018 to complete implementation of ESHB 2261. If the Court adheres to the 2018 deadline, there are only two Legislative sessions remaining: the 60-day regular beginning January 2016, and the 105-day

session in 2017. The Legislature adopts supplemental budgets during the mid-biennium short sessions. It is highly unlikely that focused, comprehensive legislative reform is possible during such a session. The 2017 long session will produce a new budget for the 2017-19 biennium, beginning July1, 2017. This, however, is just two months before the start of the 2017-18 school year—the year in which ESHB 2261 requires the redefined program of basic education and funding for the program to be fully implemented. That is why it is important to have a special session of the Legislature this year that can focus exclusively on implementing ESHB 2261, addressing inadequate staff, compensation, and local levies.

3. The Court Should Issue An Order Enjoining The Expenditure Of Non-Education State Funds That Are Not Constitutionally Required or Otherwise Necessary

When the Court held the State in contempt, it postponed ruling on what "sanctions or other remedial measures" should be imposed. Order, September 11, 2014, at 5. In the Superintendent's Amicus Curiae Brief Addressing Order To Show Cause dated August 4, 2014, the Superintendent urged the Court to establish a process to enable Respondents to move to enjoin the operation of laws enacted by the Legislature that reduce the general fund dollars available for basic education. Now the Superintendent urges the Court to issue an order enjoining spending from the General Fund at some date prior to the next regular legislative session (for example,

October 1, 2015), unless the Legislature returns in special session and makes substantial progress in adopting the reforms in ESHB 2261.

Of course to issue such an order, the Court would have to know what spending to enjoin. However, this problem has been solved by OFM. On March 4, 2015, OFM issued a directive requiring agencies to conduct contingency planning for a partial shutdown of state government in case the Legislature failed to adopt an operating budget.[9] The directive was part of contingency planning for a partial shutdown of state government in case the Legislature failed to adopt an operating budget. Agencies were directed to divide their spending into categories. Two of the categories were: services that must be continued based on certain constitutional mandates and federal law, with the caveat that agencies will consult their assigned assistant attorney general for clarification; and services necessary for the immediate response to issues of public safety, or to avoid catastrophic loss of state property. Based on the contingency plans already developed, an injunction could be issued enjoining spending that did not fall into these two categories.

The writ should be directed to the Governor, who is the state officer responsible for directing reduction in agency spending. *Cf.*

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[9] Available at: http://www.ofm.wa.gov/agencycommunications/FY2015/OFM_memo_20150304_Contingency_Planning_for_State_Agency_Operations.pdf.

RCW 43.88.110(7) (the governor shall make across-the-board reductions in allotments for particular funds or accounts when the governor projects a cash deficit as defined by RCW 43.88.050). Of course, RCW 43.88.050(7) would not apply directly to a writ issued by the Court. But it does identify the Governor as the appropriate official to enforce the Court's injunction.

IV. CONCLUSION

For the reasons stated above, the Court should issue an order enjoining spending at some date prior to the next regular session (for example, October 1, 2015) unless the Legislature returns in special session and makes substantial progress in adopting the reforms in ESHB 2261.

RESPECTFULLY SUBMITTED this 27th day of July, 2015.

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Subject: RE: Mathew and Stephanie McCleary, et al. v. State of Washington, No. 84362-7

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Supreme Court Clerk's Office

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Sent: Monday, July 27, 2015 4:50 PM
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Subject: Mathew and Stephanie McCleary, et al. v. State of Washington, No. 84362-7

Dear Clerk of the Supreme Court of the State of Washington:

RE: Mathew and Stephanie McCleary, et al. v. State of Washington, No. 84362-7

Please find attached the Superintendent of Public Instruction's Motion to File an Amicus Brief Addressing the 2015 Legislature's Compliance with McCleary, Superintendent of Public Instruction's Amicus Brief Addressing the 2015 Legislature's Compliance with McCleary, and Certificate of Service to be filed with the Washington State Supreme Court.

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