

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Y.S. et al.;

Plaintiffs,

v.

THE SCHOOL DISTRICT OF
PHILADELPHIA,

Defendant.

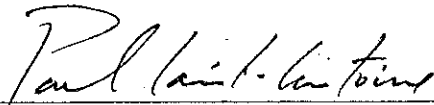
Civil Action No. 85-6924

PLAINTIFFS' MOTION TO REOPEN

Plaintiffs, immigrant and refugee students who filed a class action in 1985 against the School District of Philadelphia (the "District"), hereby move to reopen this litigation and to schedule a conference with the parties to address the status of the proceedings, including the District's compliance with the Amended Stipulation in the litigation, dated October 21, 2010. The reasons in support of this Motion to Reopen are set forth in the accompanying Memorandum.

Dated: April 29, 2013.

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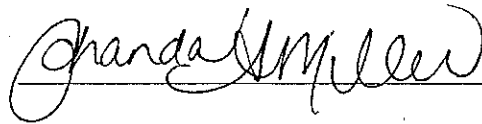
CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April 2013, a true and correct copy of Plaintiffs' Motion to Reopen was sent via U.S. mail, postage prepaid, to the following counsel of record:

Miles H. Shore, Esq.
School District of Philadelphia
Office of General Counsel
440 North Broad Street, Suite 313
Philadelphia, PA 19130

A true and correct copy of Plaintiff's Motion to Reopen was also sent via U.S. mail, postage prepaid, to:

Rachel Holzman, Esq.
School District of Philadelphia
Office of General Counsel
440 North Broad Street, Suite 313
Philadelphia, PA 19130

A handwritten signature in cursive script, appearing to read "Grand Jury", is written over a horizontal line.

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[PROPOSED] ORDER

AND NOW, this _____ day of _____ 2013, upon consideration of Plaintiffs' Motion to Reopen and any responses thereto, IT IS HEREBY ORDERED that Plaintiffs' Motion is GRANTED.

IT IS FURTHER ORDERED that a status conference shall be held on _____, 2013 at _____ in _____.

U.S.D.J.