

**STATE OF MINNESOTA
IN COURT OF APPEALS**

Case No. A17-0033

Tiffini Flynn Forslund, Justina
Person; Bonnie Dominguez; and
Roxanne Draughn,

Petitioners,

v.

State of Minnesota State of Minnesota;
Mark Dayton, in his official capacity
as the Governor of the State of
Minnesota; the Minnesota Department
of Education; Brenda Cassellius, in her
official capacity as the Commissioner
of Education; St. Paul Public Schools,
Independent School District 625;
Anoka-Hennepin School District 11;
Duluth Public Schools, Independent
School District 709; West St. Paul-
Mendota Heights-Eagan Area
Schools, Independent School District
197,

Respondents.

REQUEST FOR LEAVE OF COURT TO FILE AN *AMICUS CURIAE* BRIEF

Timothy J. Louris, Attorney No. 391244
Miller O'Brien Jensen, P.A.
120 South Sixth Street, Suite 2400
Minneapolis, Minnesota 55402

Counsel for *Amicus*:
ISAIAH

AUTHORITY FOR REQUEST

ISIAAH respectfully requests that the Minnesota Court of Appeals grant it leave to participate as *amicus curiae* in the above-captioned matter pursuant to Rule 129 of the Minnesota Rules of Civil Appellate Procedure.

BACKGROUND

ISIAAH is an organization of congregations, clergy, and people of faith acting collectively towards racial and economic equity in the state of Minnesota. ISIAAH was founded in 2000 through the merger of three independent congregation-based community organizations: Great River Interfaith Partnership (GRIP) in the St. Cloud area; Interfaith Action in Greater Minneapolis; and the St. Paul Ecumenical Alliance of Congregations (SPEAC) in Greater St. Paul. ISIAAH is affiliated with the PICO National Network.

REASONS FOR *AMICUS* DECISION

The interests of ISIAAH are public. Through leadership development, collective action and issue campaigns, ISIAAH has been a major voice for justice in the areas of housing, transportation, education, health, and civic inclusion. ISIAAH leaders work with public officials at the local, regional, state and federal level to advance innovative solutions to systemic racism.

ISIAAH has advocated for years on the issues of education equity at the school district and state level. ISIAAH campaigns have included adequate and equitable funding of public education, ending the school to prison pipeline, and increasing teacher diversity. ISIAAH can offer the Court its experience with the students, parents, educators, and school communities in Minnesota. It will assist the Court in understanding how its

decision regarding Minnesota's teacher tenure and due process statutes will specifically impact education equity for students and the school communities, as well as the efforts to increase teacher diversity.

ISAI AH works to create a Minnesota that aligns the public investments and collective resources to achieve equity in education and open access to opportunity for students of color across Minnesota. The public must engage in the political process through community and legislative activism to ensure that the voices of teachers, students, parents, and communities are heard.

ISAI AH will support the position of the Respondents by advocating that the Court uphold the Ramsey County District Court's November 9, 2016, decision dismissing with prejudice Plaintiffs' complaint in its entirety. Consideration of the *amicus curiae* will not delay the Court's disposition of this case.

For all the above reasons, ISAI AH urges this Court to grant its request for leave to participate as *amicus curiae* in the above-entitled matter.

[Signature Page Follows]

Respectfully Submitted:

Dated: January 24, 2017

MILLER O'BRIEN JENSEN, P.A.

/s/Timothy J. Louris

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ISAIAH*

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STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

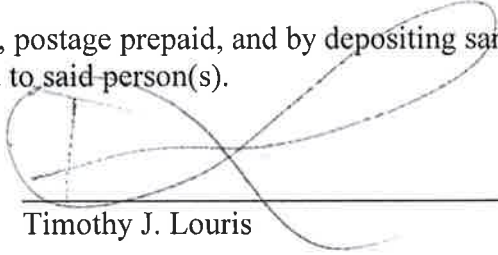
Timothy J. Louris, of the City of Minneapolis, County of Hennepin in the State of Minnesota, being duly sworn, says that on the 24th day of January, 2017, he served the following:

- ISIAAH: Request for Leave of Court to File Amicus Curiae Brief
- Centro de Trabajadores Unidos en Lucha: Request for Leave of Court to File Amicus Curiae Brief
- Minnesota Neighborhoods Organizing for Change: Request for Leave of Court to File Amicus Curiae Brief
- TakeAction Minnesota: Request for Leave of Court to File Amicus Curiae Brief

upon:

Nekima Levy-Pounds
2901 Lyndale Avenue North
Minneapolis, MN 55411

by mailing a copy thereof, enclosed in an envelope, postage prepaid, and by depositing same in the post office at Minneapolis, Minnesota, directed to said person(s).



Timothy J. Louris

Subscribed and sworn to before me
this 24th day of January, 2017.



Notary Public

