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BULLIS CHARTER SCHOOL

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

BULLIS CHARTER SCHOOL,

Petitioner,

v.

LOS ALTOS SCHOOL DISTRICT; BOARD OF
TRUSTEES OF THE LOS ALTOS SCHOOL
DISTRICT; and TIM JUSTUS, in his capacity as
District Superintendent,

Respondents.

CASE NO. 109CV144569

**NOTICE OF MOTION AND
MOTION TO COMPEL
COMPLIANCE WITH
JUDGMENT AND WRIT**

Date: August 15, 2012
Time: 9:00 a.m.
Judge: Hon. Patricia Lucas
Dept: 2

Petition Filed: June 10, 2009

(ENDORSED)
FILED

2012 JUL -3 A 9:06

David H. Yamashiki, Clerk of the Superior Court
County of Santa Clara, California
By: _____
Clerk of Court

L. Talampas

1 PLEASE TAKE NOTICE that on August 15, 2012, at 9:00 a.m., or as soon thereafter as
2 this matter may be heard by the Honorable Patricia Lucas, Petitioner Bullis Charter School will
3 and hereby does move for an order, pursuant to Code of Civil Procedure sections 128, 177, 187,
4 and 1097, compelling compliance with the Judgment and Writ issued by this Court on March 23
5 and May 31, 2012, and ordering the Los Altos School District to provide Bullis with reasonably
6 equivalent facilities in compliance with the Judgment and Writ.

7 After being ordered by the Court of Appeals and this Court to provide Bullis students with
8 reasonably equivalent facilities, the District has stubbornly planted Bullis on the same temporary
9 camp site. In addition, the District has transferred Bullis' 7th and 8th grade students to a different
10 campus on the other side of the District, and provided them with ridiculously inadequate facilities
11 at that site. It has become apparent that for political reasons, the District will not provide Bullis
12 students with reasonably facilities unless it is again compelled to do so. This Court should now
13 order the District to provide Bullis with additional facilities for the upcoming school year, and to
14 provide Bullis with its own campus beginning with the 2013-1014 academic year.

15 This motion is based on the accompanying memorandum of points and authorities,
16 declarations and exhibits, and the pleadings and papers on file herein, and such other argument
17 and evidence as may be presented at the hearing.

18
19 Dated: July 3, 2012

ARTURO J. GONZÁLEZ
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21
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23 By:

Arturo J. González

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Bullis Charter School