

1 Eric P. Early, State Bar Number 166275
2 *early@earlysullivan.com*
3 Peter Scott, State Bar Number 247786
4 *pscott@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 6420 Wilshire Boulevard, 17th Floor
8 Los Angeles, California 90048
9 Telephone: (323) 301-4660
10 Facsimile: (323) 301-4676

11 Attorneys for Plaintiff
12 FAIR EDUCATION SANTA BARBARA, INC.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 FAIR EDUCATION SANTA
12 BARBARA, INC., a 501(c)(3)
13 organization

14 Plaintiff,

15 vs.

16 SANTA BARBARA UNIFIED
17 SCHOOL DISTRICT, a public school
18 district; and JUST COMMUNITIES
19 CENTRAL COAST, INC., a
20 501(c)(3) organization,

21 Defendants.

Case No.: 2:18-cv-10253-SVW-PLA

**DECLARATION OF PETER
SCOTT IN SUPPORT OF REPLY
MEMORANDUM OF POINTS AND
AUTHORITS RE MOTION FOR
PRELIMINARY INJUNCTION**

The Honorable Stephen V. Wilson

Date: February 25, 2019
Time: 1:30 PM
Courtroom: 10A

Trial Date: None Yet



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DECLARATION OF PETER SCOTT

I, PETER SCOTT, declare as follows:

1. I am a partner in the law firm of Early Sullivan Wright Gizer & McRae LLP, counsel of record for plaintiff Fair Education Santa Barbara, Inc. (“FESB”) herein. I have personal knowledge of the matters set forth below and if called as a witness could testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of educational programs recognized by the Santa Barbara Anti-Defamation League, accessed on February 11, 2019 at the web address <https://santabarbara.adl.org/education/>.

3. Attached hereto as **Exhibit B** is a true and correct copy of an opportunity to bid on services, issued by the Antioch Unified School District, accessed from the California Bid Network on November 12, 2018 at the web address <http://www.californiabids.com>.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: February 11, 2019


PETER SCOTT

EXHIBIT A



FIGHTING HATE FOR GOOD



EDUCATION



◀ 2

A WORLD OF DIFFERENCE® Institute



ADL's **A WORLD OF DIFFERENCE® Institute** is a leading provider of anti-bias education and diversity training programs and resources. The Institute seeks to help participants: recognize bias and the harm it inflicts on individuals and society; explore the value of diversity; improve intergroup relations; and combat racism and all forms of prejudice and bigotry.

Click [here](#) for more information about how you can bring The Institute's **anti-bias and anti-bullying/ cyberbullying programs** to your school.

NO PLACE FOR HATE®



Launched locally in 2003 with the support of Julianna Friedman and Sara Miller McCune, The **No Place For Hate®** initiative serves 100 schools in Santa Barbara/Tri-Counties. By participating in No Place for Hate®, schools are taught to educate their students to foster understanding of many cultures, religions, and traditions that are shared by members of our increasingly diverse and growing community.

MILLER EARLY CHILDHOOD INITIATIVE



Since 2014, the **Miller Early Childhood Initiative** has impacted over 3,500 local caregivers, teachers and families. The Miller Initiative provides anti-bias training and resources for the early childhood community in order to create and sustain homes that encourage children to appreciate diversity at the critical ages between 3 and 5 when the seeds of prejudice can begin to take root.

GROSFELD FAMILY NATIONAL YOUTH LEADERSHIP MISSION TO WASHINGTON, DC



This annual four-day trip brings a delegation of 10 students from Santa Barbara/Tri-Counties together with students from across the country to visit Washington, D.C. Sponsored by local donors, our students learn leadership skills and discover ways to combat prejudice and bullying in their daily lives. Students have the opportunity to meet with Holocaust survivors, World War II veterans, genocide survivors and well-renowned civil rights leaders. Learning about modern day genocide and the Holocaust serves as a powerful example of what can happen when racism goes unchecked, and also as a reminder of how lives can be saved when good people are willing to stand up and to say 'no' to hate and bigotry. You're invited to read reflections students wrote about their experiences at

the **October 2014 conference**.

LOCAL LAW ENFORCEMENT



ADL has long recognized the importance of securing law enforcement as an ally in its battle against racism, hate, and extremism. So far, local sponsors have provided the opportunity for the Chief of Police of Oxnard, the Chief of Police and the Sheriff of San Luis Obispo, **the Sheriff of Santa Barbara** and the Sheriff of Ventura to

receive counter-terrorism and anti-bias training in

Israel. ADL annually brings law enforcement executives to Israel for a week of intensive **counter-terrorism training** provided by senior commanders in the Israel National Police, expert from Israel's intelligence and security services, and Israel Defense.

COLLEGE CAMPUS PROGRAMMING



The ADL Santa Barbara office offers a variety of **programs** for college campuses customized to the specific needs of the institution. Many of the programs focus on diversity education and are based on our A WORLD OF DIFFERENCE® Institute offerings.

GLASS LEADERSHIP INSTITUTE

The **Glass Leadership Institute** is ADL's emerging leadership program- identifying, training and encouraging young leaders to become involved with ADL throughout their lives. Participants are selected based on their potential leadership qualities and their sincere interest in the program.

HOLOCAUST EDUCATION



Echoes and Reflections is the result of an unprecedented partnership among three leaders in education: the Anti-Defamation League, the USC Shoah Foundation Institute for Visual History and Education, and Yad Vashem. This resource includes everything teachers need to teach the complex issues of the Holocaust and its lessons for today. Click **here** for more information.

ONLINE RESOURCES

Curriculum Connections is a collection of original lesson plans and resources that help K-12 educators integrate multicultural, anti-bias, and social justice themes into their curricula. Each edition is organized around a particular topic or theme.



Be an Ally: Six Simple Ways

Bullying Prevention and Intervention for Schools

Bullying Prevention and Intervention Tips for Families

Empowering Children in the Aftermath of Hate: A Guide for Educators and Parents

Categories

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FIGHTING HATE FOR GOOD



A World of Difference® Institute

As a leading provider of anti-bias education through the **A WORLD OF DIFFERENCE® Institute**, the Anti-Defamation League recognizes that attitudes and beliefs affect actions, and that each of us can have an impact on others, and ultimately on the world in which we live.

ADL's customizable, interactive training programs are used by schools, universities, corporations, law enforcement agencies and community organizations throughout the United States and abroad. The Institute's training modules and standards-based classroom curricula incorporate the latest research from the education field. Please



explore the options below to see how ADL educates about bias, bullying and hate throughout Santa Barbara, Ventura, and San Luis Obispo counties.

A CLASSROOM OF DIFFERENCE™ offers anti-bias training programs for pre-K through 12th grade school communities – educators, administrators, youth and families- which focus on the development of an inclusive culture and respectful school climate by addressing issues of

bias and bullying.

A CAMPUS OF DIFFERENCE™ is a leading provider in anti-bias training and resources for college and university campuses. Together, campus leaders explore the impact of bias and discrimination on individuals and on the entire campus climate, and learn strategies to challenge hate on campus. Workshops help establish more welcoming, inclusive and diverse environments where young adults have true opportunities to reach for their fullest potential as global citizens and leaders of tomorrow.

A WORKPLACE OF DIFFERENCE® is designed by experienced human relations specialists for corporations, small businesses, government agencies, nonprofit organizations and professional groups who face the challenges of satisfying a changing customer base while managing a diverse workforce. Creating and managing a diverse workplace is a business imperative for organizations that seek to be competitive, productive and successful in today's global marketplace.

A COMMUNITY OF DIFFERENCE™ offers social service workers, volunteers and staffs of community organizations – as well as civic leaders – skills and strategies to work together more effectively.

ADL Curricular Resources provide understandings of diverse perspectives, strengthen critical thinking skills, challenge the development of emerging biases, and build skills and motivation to take action against injustice.

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FIGHTING HATE FOR GOOD



NO PLACE FOR HATE®



◀ 4



No Place for Hate®

For millions of students, bullying, cyberbullying and name-calling can damage their self-esteem and ability to learn. No student should ever feel isolated because of his or her ethnicity, race, religion, sexual orientation or physical appearance. No Place for Hate is an effective part of the solution. By participating in The No Place for Hate activities, schools educate their students to foster understanding of many cultures, religions, and traditions that are shared by members of our increasingly diverse and growing community.

Launched in the Santa Barbara Region in 2003, this popular campaign has been embraced by over 100 schools in the Santa Barbara/Tri-Counties region. If your school is interested in implementing the No Place for Hate® Initiative this year, please reach out to our coordinator, Brianna Moffitt, at bmoffitt@adl.org.

To designate your school as building a No Place for Hate® community, take the first step now!



WHAT IS NO PLACE FOR HATE®?

ADL's No Place for Hate initiative provides schools and communities with an organizing framework for combating bias, bullying and hatred, leading to long-term solutions for creating and maintaining a positive climate. This is a year-long, collaborative effort between multiple stakeholders from the school's community, school staff and administration, and ADL staff. No Place for Hate schools receive their designation by:

- Building inclusive and safe communities in which respect is the goal, and all students can thrive.
- Empowering students, faculty, administration and family members to take a stand against hate and bullying by incorporating new and existing programs under one powerful message.
- Engaging schools and communities in at least three anti-bias activities per year, which ADL helps to develop.
- Sending a clear, unified message that all students have a place to belong.

NEW TO NO PLACE FOR HATE®?

If your school is new to No Place for Hate, you can take this **"Readiness Questionnaire"** to determine if your campus is prepared to implement this initiative!

4 STEPS TO BECOMING DESIGNATED AS A NO PLACE FOR HATE® SCHOOL:

1. Register Online

Schools **register online** and create a No Place for Hate Committee that will plan, coordinate and oversee the school's anti-bias projects. The committee includes students, educators and staff, administrators, family members and community leaders that reflect the diversity of the school community.

2. Sign the Resolution of Respect

A majority of the school community must sign the Resolution of Respect, affirming a commitment to promoting respect and challenging bullying.

3. Complete at least 3 Activities throughout the year

Participating schools design and implement at least three activities that highlight the themes of inclusion and respect. These activities engage the full student body in discussion around anti-bias and bullying prevention topics and ideally provide students with an opportunity to take follow-up action.

4. Receive a No Place for Hate Banner from ADL

Upon completion of all requirements, schools receive a customized banner designating their school No Place for Hate.

Learn more about our 3-year No Place for Hate roll out plan for new schools interested in establishing No place for Hate here: **Join the Movement.**

FOR MORE INFORMATION: Send an email to Santa-Barbara@adl.org

NO PLACE FOR HATE® RESOURCES:

Previous Resource Guide(pdf) Updated guides will be shared with participating schools.

Who has participated as a No Place for Hate® in the Santa Barbara/Tri-Counties Region



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FIGHTING HATE FOR GOOD



📍 Posted in **Blog**, **Early Childhood**.

Miller Early Childhood Initiative Parent Workshop held at San Marcos Parent-Child Workshop

May 18, 2014

On May 14, the San Marcos Parent-Child Workshop hosted a Miller Early Childhood Initiative™ Parent workshop for its parents. A World of Difference™

trainers, Janice Brown and Anaïs Pellegrini, led the group in a discussion on how not to instill bias in the youngest members of our society.

San Marcos Parent-Child Workshop is a collaborative pre-school where parents play the role of teacher in the classroom with the children.

[Miller Early Childhood Workshops](#) encourage parents, educators and caregivers to assess their programs' literature, wall hangings and toys to ensure that the communities' diversity is well represented. Participants also reflect on the early messages of bias they received as children and learn ways to acknowledge difference in ways that are positive and affirming for their children.

For more information on the Miller Early Childhood Initiative and to learn more on this fascinating and important subject, visit our [Question Corner](#).

📌 Posted in **Blog, Early Childhood**.

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805-564-6670

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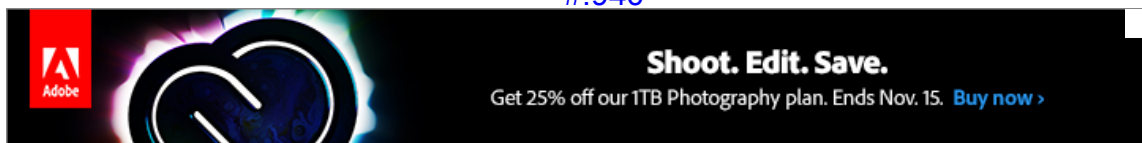
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EXHIBIT B



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RFP - Educational and Therapeutic Behavioral Support Providers

The following is general information and may not always be entirely accurate or complete. Bidders MUST ensure that they have the latest and most complete information from the soliciting entity before submitting a bid.

Bid Date & Time: 11/01/18 2:00 PM

Owner Solic Number: 18-19-04 **Status:** bidding **Report:** 8967365

Country :United States **State:** CA **County:** Contra Costa

Location: Antioch

Scope: Provide collaborative therapeutic behavior support classrooms for elementary, middle and high school students with high rates of academic work refusal, aggressive, disruptive behaviors including physical and verbal aggression, noncompliance with rules, property destruction and elopement from supervised areas.

Notes: Questions regarding this Request for Proposal shall be directed to Ruth Rubalcava, Director of Special Education at valerielopes@antiochschools.net no later than 10:00 a.m., Wednesday, October 24, 2018.

Plans: From Owner. See attached file.

Owner Type: Public

Buyer: Antioch Unified School District, Purchasing Dept.

Address: PO Box 768 510 G St.

City: Antioch

State: CA

Zip/Postal Code: 94509

TRILLIONS Business Network

Classified Ads

General Contractor Seeking Sub/Supplier Quotes for Project in Sonora, CA

Dodson Middle School ADA Barrier Removal Phase 2

Seeking Section 3 Subcontractors and Suppliers

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Its West Sacramento Headquarters Campus

TEL: 925-706-5326		FAX: 925-778-3473	
Contact: Ruth Rubalcava			
Bid Pkg Source: Antioch Unified School District, Purchasing Dept.			
Address: PO Box 768 510 G St.			
City: Antioch		State: CA	
Zip/Postal Code: 94509			
TEL: 925-706-5326		FAX: 925-778-3473	
Contact: Ruth Rubalcava			
Login to view file attachments			

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Michael Baker International Awarded \$5.6M Contract to Design New Rural Highway

Third Turbine at Nestlé Waters' Cabazon Plant Begins Operation

Blaze Pizza Opend at The Block Northway in Pennsylvania

Chemesis International to Bring QuickStrip Oral Thin Strips to Puerto Rico

Arcadia Biosciences to Develop and Commercialize Wheat Innovations

Badgerland Disposal Wins Waste Services Contract for Oakland

Swinerton to Construct 200MWdc Mount Signal 2 Solar

Ronald Reagan Presidential Library Picks Sodexo for Elevated Dining

Coleman Floor Company Acquired by Interior Logic Group

U.S. Marine Corps To Repair Runway At Catalina Island's Only Airport

Kratos Selected to Build Multi-Site Ka-band Gateways for SKY Perfect JSAT

EDF Energy to Install 1,500 Smart Electric Chargers in the UK

Lineage Logistics and Dreisbach Opens Lineage Cool Port Oakland

GreenPower to Deliver Six EV Star Min-eBuses to Sacramento

Wells Fargo Grants \$200,000 for New Mexico Education and Small Business Efforts

San Diego Launches Formation Of Joint Powers Authority to Manage Community Power Purchasing

KB Home to Open Sawgrass Bay in Florida

Xcel Energy to Use Google Assistant Voice Actions for Energy Efficiency

Improvements
Greenbacker Renewable Energy Completes Its Largest Solar project
United Pacific Acquires 39 Gas Stations in Southern California
Viasat-SpaceX Enter Contract for ViaSat-3 Launch
Kratos to Deliver 6 New Drone Aircraft to National Security Customers
Maxar's SSL to Delivers Two Earth Observation Satellites
HackerOne Receives Crowdsourced Security Contract
Axos Bank to Provide Co-Branded Banking Products to Nationwide's Customers
Cubic Corporation Agrees to Acquire Trafficware for \$235.7 Million in Cash
AgilePoint and UiPath to Provide Robotic Process Automation Solutions
Ameren to Acquire Brickyard Hill Wind Project After Construction
Sheffield Metals International to Set Up New Facility in Southern California
Willdan Received Contract for SoCalGas Commercial Energy Management Technology
A-Z Bus Delivers Electric Buses to Multiple California School Districts
Chelsea Groton Bank Joins iGrad to Provide Financial Wellness Education
HSSV Receives \$200K for Maddie's Executive Leader Fellowships
EDF Renewables to Provide Onsite Battery Energy Storage for San Diego Zoo Global
CapsoVision Forms Distribution Partnership With PENTAX Canada, Inc.

Halo Labs to Supply Cannabis Oil in California
Qualcomm Releases Mobile Device Tracking Tech As Open Source Software
FLO Partners with ChargePoint to Bring Its Charging Tech to U.S.
Electra Mecannica Delivers Unit 1 of Its New Single Passenger EV Auto
Chevron Donates \$500,000 for Hurricane Relief
Priyanka Chopra Invests in Holberton School to Promote Software Engineering
Honeywell and Fetch Robotics to Deliver Autonomous Mobile Robots
Kespry Partners with XAP 360 to Provide Drone-Based Roof Inspection
Millennium Hotels and Resorts Breaks Ground in California
EsVolta to Deliver Lithium-Ion Battery Energy Storage Systems
Axalta Opens New state-of-the-art Facility in California
200-MW Wright Solar Project Breaks Ground in San Mateo County, California
Sigue Money Transfer Now Available in OXXO Convenience Stores in Mexico

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