

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

WILLIAM PENN SCHOOL  
DISTRICT, *et al.*,

*Petitioners,*

-against-

PENNSYLVANIA DEPARTMENT  
OF EDUCATION, *et al.*,

*Respondents.*

No. \_\_\_\_\_

**MOTION TO SCHEDULE PROMPT STATUS CONFERENCE AND  
SET EXPEDITED SCHEDULE FOR PLEADINGS, DISCOVERY, AND  
TRIAL**

Parents, school districts, and organizations from across the Commonwealth today filed suit against several state officials and entities (“Respondents”) alleging that Respondents have supported an irrational and inequitable school financing arrangement that drastically underfunds school districts across the Commonwealth and discriminates against children on the basis of the taxable property and incomes in their districts. Petitioners contend that in adopting this arrangement,

Respondents have violated (i) Article III, Section 14 of the Pennsylvania Constitution, which requires the General Assembly to “provide for the maintenance and support of a thorough and efficient system of public education to serve the needs of the Commonwealth”; and (ii) Article III, Section 32, which requires Respondents to finance the Commonwealth’s public education system in a manner that does not irrationally discriminate against a class of children. Given the urgency of these claims and pursuant to the Court’s general authority to regulate judicial proceedings and expeditiously address cases as deemed proper by the Court, *see* Pa. Commw. Ct. Internal Operating P. § 313, Petitioners respectfully request that the Court promptly schedule a status conference to determine an expedited schedule for pleadings, discovery, and trial.

Unless the Petition is resolved expeditiously, not only will the Petitioner children at the heart of this matter grow up without the opportunity to receive an adequate education, but children throughout the Commonwealth—including those attending the Petitioner school districts—will continue to be denied access to the basic resources necessary for a quality education, including appropriate class sizes, experienced and effective teachers, up-to-date books and technology, adequate course offerings, and suitable facilities. These children will therefore remain unable to meet state academic standards and will grow up without the high-quality public education that state officials have deemed necessary to succeed in today’s

world. Those lost educational opportunities can never be retrieved. And that would be a loss not just for the children themselves, but for the entire Commonwealth. Thus, there should be no dispute as to the importance of these issues and the need to move ahead in a prompt and orderly manner.

Dated: November 10, 2014

Respectfully Submitted,

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By:  /s/ Maura McInerney

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By: /s/ Matthew J. Sheehan

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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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**PROOF OF SERVICE**

I hereby certify that I am this 10th day of November 2014 serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of Pa. R.A.P. 121:

**Service**

Served: Robert M. Tomaine, Jr.  
Chief Counsel  
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Served: Sen. Joseph B. Scarnati III  
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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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(Continued)

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Speaker of the House  
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**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**PROOF OF SERVICE**

(Continued)

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Petitioner Wilkes-Barre Area School District  
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Petitioner Shenandoah Valley School District  
Petitioner Jamella and Bryant Miller  
Petitioner Sheila Armstrong  
Petitioner Tyesha Strickland  
Petitioner Angel Martinez,  
Petitioner Barbara Nemeth  
Petitioner Tracey Hughes  
Petitioner Pennsylvania Association of Rural and  
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Petitioner National Association for the  
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