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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and on behalf of their minor child N.H.; VERONICA BERRY individually and on behalf of her minor child J.B.; RED AND SHEILA FLORES individually and on behalf of their minor child C.F.; JAOUAD AND NAIMI BENJELLOUN, individually and on behalf of their minor children N.B.1, N.B.2, and N.B.3; KIMBERLY AND CHARLES KING individually and on behalf of their minor children L.K.1 and L.K.2; NEVADA CONNECTIONS ACADEMY,

Plaintiffs,

v.

STATE OF NEVADA, ex rel. STATE PUBLIC CHARTER SCHOOL AUTHORITY, a political subdivision of the State of Nevada, and PATRICK GAVIN, in his official capacity as Director of the State Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

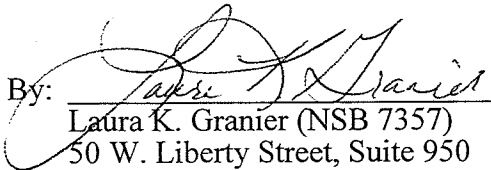
**NOTICE OF FILING OF ORIGINAL
DECLARATION IN SUPPORT OF
MOTION FOR TEMPORARY
RESTRAINING ORDER/
PRELIMINARY INJUNCTION**

On November 2, 2016, Plaintiffs filed a Motion for Temporary Restraining Order and Preliminary Injunction. Attached as Exhibit 28 to the Motion was the executed declaration of Sheila Flores, which was received by my office by facsimile. Attached to this Notice is the original declaration.

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Respectfully submitted this 8th day of November, 2016.

DAVIS GRAHAM & STUBBS LLP

By: 
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Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

**DECLARATION OF SHEILA FLORES
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

I, Sheila Flores, do certify under penalty of perjury as follows:

1. The matters set forth in this declaration are based on my own personal knowledge.

If called upon to testify, I am competent to testify to the matters set forth herein. I make this declaration in support of the Plaintiffs' Motion for Temporary Restraining Order and Preliminary

1 Injunction.

2 2. My daughter, C.F., enrolled at Nevada Connections Academy (“NCA”) halfway
3 through the 2014-15 school year having left Centennial High School in the Clark County School
4 District where she accumulated only 4.5 credits over her freshmen and first half of her
5 sophomore year after experiencing difficulty in class and with attendance because of her need for
6 medical treatment and monitoring for her diabetes. After being told by her prior school that it
7 was impossible for her to graduate on time, she enrolled at NCA and in 1.5 school years has
8 accumulated 8.0 credits with NCA and is now back on track to graduate on time or even early.
9

10 3. Nevada Connections Academy has provided my daughter a highly individualized
11 education and the chance to graduate on-time that the traditional public school was unable to
12 provide her. NCA is our school of choice and it is critical it remain an available option for my
13 daughter and all students in Nevada. Any interference in NCA’s operations would interfere with
14 my daughter’s education and the educational opportunity and choice to all Nevadans which I
15 believe would cause irreparable harm to my daughter and all of Nevada’s youth – some of whom
16 find NCA to be their only option to complete their high school education because their prior
17 schools have failed them.
18

19 4. I respectfully request that this Court stop the State Public Charter School
20 Authority from going forward with closure proceedings against NCA or attempting to interfere
21 with NCA’s ongoing operations. My daughter is among those students who was behind in school
22 and would have become part of a “drop-out” statistic. I understand that by enrolling her, NCA
23 risked having a lower graduation rate, but they took us with open arms and have helped her get
24 on-track, catching up so she can graduate on time. Penalizing schools for serving students like
25 my daughter who have not been well served by the traditional public schools is bad policy and
26 harmful to our youth and our State. I urge this Court and the State of Nevada’s public agencies
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to put our youth before politics and look at the students' lives behind this single number of focus
– the four-year cohort graduation rate.

I declare under penalty of perjury under the laws of the State of Nevada that the
foregoing is true and corrected and was executed this 2 day of November, 2016, in
LAS VEGAS, Nevada.


SHEILA FLORES

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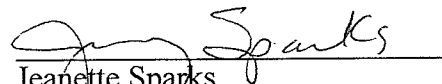
CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs LLP and not a party to, nor interested in, the within action; that on November 8, 2016, a true and correct copy of the foregoing document was enclosed in a sealed envelope, and served as listed below:

Gregory D. Ott, Esq.
Deputy Attorney General
100 N. Carson Street
Carson City, NV 89701

VIA U.S. MAIL

Attorneys for Defendants


Jeanette Sparks