

EXHIBIT LL

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7 *Attorney for Plaintiffs*

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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

**DECLARATION OF N. BENJELLOUN
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

I, N. Benjelloun, 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/ Preliminary

1 Injunction.

2 2. I am a 7th grade student at Nevada Connections Academy (NCA).

3 3. Unlike most brick and mortar schools, Nevada Connections Academy lets their
4 students work at their own pace. I can do more school after my daily assignments. This comes in
5 handy when I have an event coming up, and I cannot do school that day, or when I feel I can do
6 better, by doing more school and studying more. If NCA shuts down, I would lose all the
7 advantages of going to this online school. In a brick and mortar school I would be forced to work
8 at a certain pace, and lose the ability to work ahead and study my future lessons, when my
9 assignments are graded. In a brick and mortar school my teachers will not tell me what I did
10 wrong and try to help walk me through the question(s) I missed. I would lose this anti-bullying
11 environment, and I will lose all the friends I made here at NCA.

12
13
14 4. My education would be deeply negatively affected, in an irreparable way, by
15 losing all the caring teachers, and the ability to take time to study my lesson, without being
16 rushed by a teacher. At a brick and mortar school I would not be able to be as independent when
17 it comes to my lesson schedule. Thanks to NCA, I do not have to worry about ever missing
18 lessons due to a doctor appointment or an important event, I can do them when I am home or the
19 day before I am busy. Nevada Connections Academy also has teachers who care about their
20 students and their jobs, they are there for you if you get stuck on a lesson or you need to submit
21 a correction for an assignment. NCA helped me in so many ways I cannot explain, and it is still
22 helping me further my education. If Nevada Connections Academy was to be shut down, I would
23 not be the only student negatively affected, hundreds of other students will lose their school,
24 their friends, and all the advantages they get with Connexus. My family has been with Nevada
25 Connections Academy for about ten years, three of my siblings graduated high school here, and
26 hopefully soon my two other siblings and I will graduate high school here too.
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5. I am glad to be going to NCA and ask that this Court stop the threatened closure proceedings against my school and order that Nevada Connections Academy be allowed to continue serving all of its students. Our school choice should not be taken away from us.

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 28 day of October, 2016, in Las Vegas Nevada.

N. Benjelloun
N. BENJELLOUN

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1 Injunction.

2 2. I am a 7th grade student at Nevada Connections Academy ("NCA"). NCA
3 provides its students with very flexible hours and caring teachers, they give you the ability to be
4 independent with your schedule and studies. If Nevada Connections Academy was to be shut
5 down, many of the students would lose all their friends and all the advantages that are here at our
6 school. I would not be the only student irreparably harmed if my school were to be shut down. I
7 do not believe that the students would be able to find a school with such caring teachers, and a
8 schedule as independent as this one.

10 3. Most kids come here to NCA because it is an anti-bullying environment. In
11 traditional brick-and-mortar public school a lot of the kids get bullied and picked on so their best
12 option is to come to Nevada Connections Academy which has a very good anti-bullying
13 environment.

15 4. Unlike any other school Nevada Connections Academy has a somewhat stress
16 free environment due to the independent schedule they offer. Let's say a student had an event or
17 doctor appointment coming up, they will not have to worry about being late for class – they
18 would be able to do their school whenever they come home or even the next day.

19 5. During my 6th grade school year in Nevada Connections Academy I had a very
20 caring teacher who cared about his students very much. If we did not understand something he
21 would try his best to explain it to us. He had empowering quotes in every live-lesson. Even
22 though NCA is an online school it is not always behind a computer screen - they host many
23 events and field trips that you can use as an opportunity to meet your teachers and hang out with
24 your friends. Teachers of NCA host some events where they help the student with something
25 they do not understand like a portfolio and they try their best to help you with it.

26 6. Nevada Connections Academy also offers stuff that you cannot get at any other
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1 online school. They offer many different clubs such as: chess club, robotic club, pen pal club,
2 and many more different clubs.

3 7. If Nevada Connections Academy were to be shut down it would not only cause
4 me irreparable harm by taking away my school and my education of choice, it would do impose
5 this harm on many other students. I do not believe there is any other option available in Nevada
6 that is comparable to the education Nevada Connections Academy is providing me. Other
7 schools do not allow students to work at an independent pace, allow flexible hours, or provide as
8 caring teachers as NCA does.
9

10 8. I am asking that this Court order that the attempt to close my school be stopped so
11 that my family and others in Nevada can continue to have this important option for our
12 education.
13

14 I declare under penalty of perjury under the laws of the State of Nevada that the
15 foregoing is true and corrected and was executed this 28 day of October, 2016, in Las Vegas
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this declaration in support of the Plaintiffs' Motion for Temporary Restraining Order/
Preliminary Injunction.

2. Enlightened by my parents and former classmates, it has come to my attention that Nevada Connections Academy is being threatened with closure. My time has been completely consumed by the great academic responsibilities demanded of me by the UNLV Honors College and duties to my team on the nation-wide home-building competition, the Solar Decathlon. Despite this, I find it important to find the time to do what I can to make sure that this school continues to function and complete its duty of preparing young minds to be competent and intelligent adults.

3. I attended Nevada Connections Academy my entire undergraduate life, for the most part here in Nevada. This school is the reason that I have been able to prosper and achieve academic success. That may sound like an overstatement but the challenges that this school provided for me forced me to reach levels of determination and competence that I thought were impossible and unachievable. Now, let-alone the rigorous and difficult courses that the school provides, I was encouraged by my mentors, parents and teachers to complete the average four-year high-school journey in a matter of two years. This was not easy. I studied as the days passed into the nights, I refused to take breaks; and as soon as I finished one grade of high-school, I was immediately met with another semester to complete. It was my perseverance and determination, along with the great support of my parents and teachers that let me accomplish this goal; but it was Nevada Connections Academy that served as the catalyst. Without this school, I would have never accomplished anything despite my determination.

4. Nevada Connections Academy has, and always will, serve as the greatest catalyst

1 for young minds and upcoming adults to become influential world-leaders. It has always
2 done this, ever since my older brother graduated high-school seven years ago (at the age
3 of 14, and who now serves as the CEO of Tech-Start, a start-up company that prepares
4 young children for their future world of technology and computers) until now, when my
5 younger sister strives to finish her high-school journey in a single year.
6

7 5. To shut down a school that has charted many journeys, and produced many
8 intelligent adults, is to not only kill the future of hundreds of children, but to further the
9 devastating decline of the United States' school system. The closure of this school is not
10 only detrimental to the immediate students and teachers here in Nevada (which already
11 has one of the worst education systems in the U.S.), but also to the nation as a whole.
12 This is the first step in many that will lead us to a chaos-ravaged nation of ignorance; and
13 ultimately, the down-fall of the United States all-together. Why take that step? Why not
14 continue to let Nevada Connections Academy prosper and nurture young-genius and
15 students of all abilities? The fact that I am writing this concerns me greatly as it means
16 that we are already headed down a path that we will never recover from, and the
17 destination of this path will make the struggle that our ancestors and forefathers faced
18 200 years ago pointless – do not shut down this school.
19
20

21 6. Closure of Nevada Connections Academy would impose irreparable harm on the
22 students it is serving and all of Nevada's and our Nation's youth. I ask this Court to stop
23 this from happening and require that Nevada Connections Academy be allowed to
24 continue providing this critical education choice to all of our youth here in this great
25 State.
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28 I declare under penalty of perjury under the laws of the State of Nevada that the

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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

**DECLARATION OF Z. BENJELLOUN
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

I, Z. Benjelloun, 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

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this declaration in support of the Plaintiffs' Motion for Temporary Restraining Order/
Preliminary Injunction.

2. I graduated from Nevada Connections Academy in 2013 2 years ahead of
schedule. My brothers/sisters currently attend Nevada Connections Academy.

3. Nevada Connections Academy helps students succeed by preparing them for life
after school -- especially during the high school years. The curriculum is challenging for
students allowing them to reach their fullest potential. While I was at Nevada
Connections Academy I was able to complete my school work at any time of the day
allowing me to pursue hobbies and talents that other school systems would prevent me
from doing. Nevada Connections Academy has given my family the opportunity to spend
quality time with each other and become involved in each other's lives. It has also given
me the opportunity to finish my senior year within one semester so that I could start
college sooner. Though the curriculum is very challenging, it is well monitored with
experienced teachers. This school reduced my stress level with academics because I
could just log on to class, so if I felt overwhelmed I could just take a break or complete
my assignments in the evening.

4. Nevada Connections Academy has helped me succeed academically as well as
socially, even though they are primarily an online school system. Students and teachers
within the same city would meet weekly at park events hosted by the school and often
had field trips that we could attend every month. Nevada Connections Academy allows
students to work at their own pace, relieving them of the stress and anxiety of homework
and assignment deadlines which greatly improves our ability to derive logical solutions to
any problem in both schoolwork and real life situations. The optimal curriculum

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challenges students, however does not overwhelm students. Throughout nearly the entire duration of my attendance at Nevada Connections Academy, I have overcome tedious problems through the logical reasoning that the school has taught me to perform. I do not have any trouble balancing school, jobs, and other life activities due to the occupational preparation that has been given to me from Nevada

5. I believe Nevada Connections Academy is a critical option for students in Nevada and that there is no other opportunity like this in Nevada. Any interference with the school's ongoing operations, I believe, would cause irreparable harm to students and families in Nevada who should have this important school choice for their education.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct and was executed this 27th day of October, 2016, in Las Vegas, Nevada.



Z. BENJELLOUN

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3 50 W. Liberty Street, Suite 950
4 Reno, Nevada 89501
5 (775) 229-4219 (Telephone)
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7 *Attorney for Plaintiffs*

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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

**DECLARATION OF PAULINE CAREY
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

I, Pauline Carey, 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

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Injunction.

2. I do not want Nevada Connection Academy to close as I believe it is a critical school choice for Nevadans. I pulled my son from the traditional Nevada public schools because my experience was that the teachers do not care. If you dare ask the teacher how to help raise your child's grade in a subject, they look at you like you are stupid and try to down talk you as if you insulted their teaching ways. The middle school I am zoned for has one star out of five – what is that telling me as a parent about my choice if Nevada Connections Academy is taken away from us?

3. I want what is best for my son - a good education - and Nevada traditional public schools are not giving that to him. If we are still here when my youngest son starts kindergarten he will be going to Nevada Connections Academy, too. We are a military family. We need a good school and Nevada Connections Academy is it. My son has learned more in the six-seven weeks at Nevada Connection Academy than he has in two years in Nevada traditional public school. His grades and his academic progress prove it.

4. I believe closing Nevada Connections Academy would harm Nevada's youth and the entire state in an irreparable way by depriving us all of a critical choice in public education. I ask that this Court stop the threatened closure proceedings and order that our school be allowed to continue serving us and other Nevada students without interference.

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 27 day of October, 2016, in Las Vegas Nevada.


PAULINE CAREY

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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

**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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28

1 to put our youth before politics and look at the students' lives behind this single number of focus
2 - the four-year cohort graduation rate.

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

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8 SHEILA FLORES

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

<p>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,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>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,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 16 OC 00249 1B</p> <p>Dept. No. I</p> <p>DECLARATION OF BEVERLY CATHER IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION</p>
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I, Beverly Cather, 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/Preliminary Injunction.

2. My daughter attends Nevada Connections Academy and is in the ff grade.

3. I believe the school is a great benefit to my family and others because of the structure how the students can work at their own pace. We do not have bullying issues as we would in public schools. In my opinion the faculty and staff support is very beneficial. The teachers have gone above and beyond normal teacher duties by being there for the students after normal working hours and care enough for the students to help them not just with school difficulties but

with personal ones also, by messaging and/or calling to make sure the students are doing okay and help them when and if they need help in anyway.

4. Because of the structure of the school, my daughter can work any hours of the day or night leaving us free to schedule other activities pertaining to school or personal reasons. Because of this my daughter is able to graduate a year early.

5. We have been with this school for 4 years, and yes there has been a few problems but, I haven't seen anything that hasn't been able to be resolved. This school has helped many students with all types of learning levels including disabilities and advanced abilities, I think more so than traditional brick and mortar public school could have resources or time for.

6. I don't know what we will do if this school is closed. I will not place my daughter back into the traditional brick and mortar public school systems with all the problems they have.

Therefore, I believe any interference with her school's continued operations would cause her and other students in Nevada irreparable harm by interfering with her education and our school choice. I ask that this Court issue an order to stop any attempt to close Nevada Connections Academy or interfere with its ongoing operations – and require that NCA be allowed to continue serving the thousands of Nevada students it is educating.

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 26 day of October, 2016, in RENO, Nevada.


BEVERLY CATHER

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