

Full Notice of Proposed Settlement of Class Action Lawsuit

J.R. v. Oxnard School District et al., Case No. 2:17-cv-04304-JAK-DTx

Who is affected by the Settlement?

All students in the Oxnard School District who have or may have disabilities and who have been or will be subject to the District's policies and procedures regarding identification and evaluation of students for purposes of providing services or accommodations under the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act and/or the Americans with Disabilities Act.

Please read this notice carefully. Your child's rights may be affected.

The proposed settlement (the "Settlement" or "Agreement") resolves a lawsuit alleging that Oxnard School District discriminated against students with disabilities by failing to evaluate and identify them for special education services and supports.

Your Legal Rights and Options in This Settlement

- 1. You can do nothing:** You do not need to do anything to obtain the benefits of this Agreement. If you do nothing and the Settlement is approved, you will be bound by the terms of the Settlement.
- 2. You can object:** You may write to the Court if you do not like the Settlement. You can also go to the Fairness Hearing if you object to the Settlement.

These rights and options are explained in this Notice

General Information

What is this lawsuit about?

The lawsuit, *J.R. v. Oxnard School District et al.*, Case No. 2:17-cv-04304-JAK-DTx, filed in the United States District Court for the Central District of California in 2017, was brought by individual students with disabilities in the Oxnard School District on behalf of a class of similar students. The organization, Primero Los Ninos, was also a Plaintiff in the lawsuit. The lawsuit alleges that the District violated federal laws that protect students

with disabilities by not providing special education evaluations or services when they showed clear signs of having a disability.

The District has denied these allegations and any wrongdoing.

What is a class action?

A class action is when a few of the plaintiffs make their claims on behalf of a group of people who have similar issues. In this case, a group of plaintiffs brought this lawsuit on behalf of themselves and other Oxnard School District students who might also have been impacted by the District's policies and practices. The Plaintiffs are acting as the representatives on behalf of all the impacted students (also called the "Class Members" or "the Class").

Why is there a settlement?

The Court has not decided the case in favor of either side. Instead, the Plaintiffs and the District have agreed to settle the case. They believe that the Settlement they have reached is fair, adequate, reasonable, and in the best interests of the Class Members. In reaching this conclusion, the named Plaintiffs (also known as Class Representatives) and their lawyers have considered the benefits of the Settlement, the possible outcomes if the case continues, and the expense and length of continuing with the case and possible appeals.

What will happen if the Settlement is Approved.

If the Settlement is approved by the Court, the District has agreed to take a number of actions to improve its process to refer and assess students with suspected disabilities for special education. This includes the following:

1. Referrals of Students for Special Education Assessments:

The District will update its policies and procedures to ensure that it follows federal and state laws that require identifying, referring, and assessing students with suspected disabilities in a timely manner. The District agrees to the following:

- If District staff have reason to suspect that a student may have a disability and that the student may need special education services, the District will refer the student for assessment without delay.
- The District will document all requests for special education assessments.
- The District will not use the Student Success Team (SST) process instead of a referral for special education assessment and will not require an SST meeting prior to a referral for special education assessment. Any student with or without a disability may still be referred for an SST to address educational or other challenges. The SST process will use targeted, evidence-based interventions, with quantitative data tracking.
- The District will follow California law in implementing universal dyslexia screening for students in grades K-2.
- When a parent/guardian, anyone on behalf of the parent/guardian, or teacher/staff makes an oral or written request for a special education assessment, the District will provide a written response to the parent/guardian within 15 days.
- The District will assess students in all areas of suspected disability and will complete special education assessments within 60 days of receiving parent/guardian's written consent to conduct those assessments.

2. Tracking:

The District will use a web-based student information system (called "SIRAS") to manage and track SST referrals, SST student outcomes, and special education requests, referrals, and assessments in the District. The District's Director of Special Education, with the support of the District's special education managers and data technicians, will monitor special education referral and assessment timelines using SIRAS. A District administrator will monitor the SST process, also using SIRAS.

3. Training:

The District will provide annual training for staff regarding their obligations under the law to identify students who may need special education services and refer them for assessment (also known as "Child Find"). This will include all general education teachers, special education teachers, school

counselors, school psychologists, administrators, occupational therapists, and speech and language pathologists.

In order to reach all students enrolled within the District as well as children that live within the boundaries of the District that are not enrolled in the District, the District will make information regarding their Child Find obligations available to all families of District students, to private schools and organizations in Oxnard, and on the District's website.

4. Monitoring and Continuing Jurisdiction of the Court:

The Federal District Court will maintain jurisdiction for two years after the Agreement is approved to make sure that the Agreement is enforced.

The attorneys for the Class will monitor the District's compliance with the Agreement. The District will provide the attorneys for the Class: updated policies and procedures, copies of training materials used for staff training, random samples of SST files (with identifying information crossed out or hidden), data on special education referrals, and specific enrollment data. If, after reviewing the materials and data, the attorneys for the Class determine that the District is not following the Agreement, the attorneys can take actions, including asking the Court to enforce the District's compliance with the Agreement.

How the Settlement affects class-wide claims.

Under the Settlement Agreement, the Class gives up certain class-wide claims. This includes:

- *Claims for class-wide injunctive relief,*
- *That are related to allegations that the District failed to identify and evaluate students in need of special education in violation of the Individuals with Disabilities Education Act (IDEA), the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act (Section 504),*
- *That arose before the date the Settlement is effective or during the two years following the settlement, while the attorneys for the Class are monitoring compliance with the Agreement.*

This means that no Class Representative or Class Member can bring

another case challenging the system that the District has in place to meet its Child Find obligations, during the time covered by the Agreement.

Nothing in the Agreement releases any individual claims. You do not give up your right to file a due process complaint on behalf of your child for individual claims against the District on any matter under IDEA or related California Education Codes.

When will the court decide if it approves the Settlement?

The Court will hold a hearing, called a “Fairness Hearing” on **May 11, 2026 at 8:30 a.m., in the Courtroom of the Honorable Judge John A. Kronstadt at the First Street Courthouse, 350 W. First Street, Courtroom 10C, Los Angeles, CA 90012, to decide whether the proposed Settlement Agreement is fair, adequate and reasonable, and should be finally approved.** Please check the Court’s website the Friday before the hearing to see if the time of the hearing has been updated: <https://apps.cacd.uscourts.gov/Jps/honorable-john-a-kronstadt>

If you choose to attend, instructions are below.

Do I have a lawyer in this case?

Yes. If your child is a Class Member, attorneys from Disability Rights Advocates, Learning Rights Law Center, and Vanaman German LLP represent you and your child solely for the purposes of this Settlement. You will not be charged for being represented by the lawyers in this case. If you want to get your own lawyer, you may hire one at your own expense.

Will the lawyers in this case be paid?

Yes. The Settlement Agreement states that the attorneys for the Class can seek reasonable attorneys’ fees from Oxnard School District. You will not be responsible for any attorneys’ fees under the Agreement. After the Court preliminarily approved the Class Settlement and directed this notice, the Parties met for an in-person mediation on fees and costs and agreed to a payment of \$1,750,000.00 to Class Counsel for their fees and costs for work on the case since 2017. The number was agreed to via a proposal from the mediator, Hon. Patrick J. Walsh (Ret.). The payment of attorneys’ fees will not impact the training, policies and practices that the District has

agreed to put in place.

The attorneys for the Class shall also be entitled to be paid for their time and costs spent on monitoring the work that the District does to meet the promises in the Settlement Agreement. The amount that the attorneys are paid for that work will not impact the training, policies and practices that the District has agreed to put in place either.

What if I object to the Settlement?

How do I tell the Court that I do not like the Settlement?

If your child is a member of the Class, you can object to the Settlement if you do not agree with it. You can give reasons why you think that the Court should not approve the Settlement so that the Court can consider your views. You cannot ask the Court to change the terms of the Settlement; the Court can only approve or deny the Settlement. If the Court denies the Settlement, the actions outlined in this notice will not occur and the lawsuit will continue.

Any objection to the proposed Settlement must be in writing and (a) clearly identify the case name and number (*J.R., et al. v. Oxnard School District, et al.* Case Number 17-cv-04304-JAK-DTx), (b) be submitted to the Court, with a copy to the attorneys listed below, either by mailing it to the Clerk, United States District Court for the Central District of California, First Street Courthouse, 350 W. First Street, Los Angeles, CA 90012, or by filing it in person at any location of the United States District Court for the Central District of California and (c) be filed or postmarked on or before April 6, 2026. You may also appear at the hearing on May 11, 2026 to object to the Settlement.

On any objection sent to the Court, please also send by email to:

sparks@dralegal.org

Or send by mail to:

Disability Rights Advocates
Attn: J.R. v. Oxnard Class Settlement
2001 Center Street, Third Floor
Berkeley, CA 94704

IF YOU DO NOT OPPOSE THIS SETTLEMENT, YOU NEED NOT APPEAR OR FILE ANYTHING IN WRITING.

IF YOU DO NOT TIMELY MAKE AN OBJECTION AS DESCRIBED ABOVE, YOU WILL HAVE WAIVED YOUR OBJECTION AND SHALL BE PREVENTED FROM MAKING ANY OBJECTION TO THE SETTLEMENT AGREEMENT.

IF YOU PLAN ON ATTENDING THE FAIRNESS HEARING TO OBJECT TO THE SETTLEMENT YOU MUST STATE THIS IN YOUR OBJECTION.

When will the Court make a decision about approving the Settlement?

The Court will hold a Fairness Hearing on May 11, 2026 at 8:30 a.m. in the Courtroom of the Honorable Judge John A. Kronstadt, First Street Courthouse, 350 W. First Street, Courtroom 10C, Los Angeles, CA 90012, to determine whether the proposed Settlement Agreement is fair, adequate and reasonable, and should be approved. If there are objections, the Court will consider them.

After the hearing, the Judge will decide whether to approve the Settlement.

Do I have to attend the Hearing?

No. The lawyers for the Class (Disability Rights Advocates, Learning Rights Law Center, and Vanaman German) will attend the hearing and answer any questions the Judge may have about the case.

You are welcome to attend the hearing if you like, but you must pay for your own travel to the hearing.

If you send an objection letter, you do not have to come to the hearing. All you must do is send your written letter by the deadline. If you have your own lawyer, you may also pay your lawyer to be at the hearing, but that is up to you.

What if I do not do anything?

You do not need to do anything for your child to receive the future protections from this Settlement.

Getting More Information

Are there more details about the Settlement?

This notice summarizes the Settlement. There are more details in the Settlement Agreement itself. If this notice is different from the Agreement, the terms of the Agreement are correct.

You can receive a copy of the Agreement by visiting:

<https://dralegal.org/case/j-r-v-oxnard-school-district> You can also request a copy of the Agreement or ask questions about the case or Agreement by contacting the attorneys for the class listed below:

sparks@dralegal.org
510-495-0219

You can also access all of the documents filed in court (the Court docket) in this case through any of the following ways:

- Court's Public Access to Court Electronic Records (PACER) system at <https://pacer.uscourts.gov/>
- Visiting the office of the Clerk of the Court for the United States District Court, Western Division, Records Department, Los Angeles Courthouse, 255 East Temple Street, Suite TS-134, Los Angeles, CA 90012, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding court holidays.

Detailed information on how to request and obtain copies of the Court documents is located on the Court's website at

<https://www.cacd.uscourts.gov/records>.

Please do not call the Court or the Court Clerk's office to ask about this Settlement.