

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DEBORAH ALEXANDER, MAUD MARON, and  
NOAH HARLAN,

Plaintiffs,

-against-

TAJH SUTTON, President, Community Education  
Council 14, in her official and individual capacities;  
MARISSA MANZANARES, First Vice President,  
Community Education Council 14, in her official  
and individual capacities; DAVID C. BANKS,  
Chancellor, New York City Public Schools, in his  
official and individual capacities; NINA S.  
MICKENS, Equity Compliance Officer, in her  
official and individual capacities; COMMUNITY  
EDUCATION COUNCIL 14; NEW YORK CITY  
DEPARTMENT OF EDUCATION,

Case Number 1:24-cv-2224

Defendants.

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**STATUS REPORT**

Defendants Tajh Sutton and Marissa Manzanares, by their counsel Jonathan Wallace, provide the following status report.

1. Counsel Wallace and Assistant Corporation Counsel have engaged in a fruitful discussion regarding avenues to settle the first three items in Plaintiff's proposed order. While these discussions remain confidential at this stage, Defendants intend to make an offer to Plaintiffs this week or early next week concerning the X account and CEC 14 meetings.
2. Mr. Wallace recognizes that he does not currently represent CEC-14 unless and until this Court grants a motion to disqualify corporation counsel. If a consent decree can be negotiated, this issue would become moot and not stand in the way of settlement. If

negotiations are unsuccessful, we will request a briefing schedule from the Court.

3. Ms. Sutton has decided not to pursue the administrative appeal to the Commissioner on the grounds it would be futile, but does not waive her constitutional and federal law claims regarding her removal from CEC-14.

Amagansett, N.Y.  
August 28, 2024

/s/ Jonathan Wallace  
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and Sutton