

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

C.P., individually and on behalf of F.P.,
a minor child; D.O. individually and on
behalf of M.O., a minor child; S.B.C.,
individually and on behalf of C.C., a
minor child; A.S., individually and on
behalf of A.A.S., a minor child; M.S.,
individually and on behalf of her minor
child, H.S.; Y.H.S., individually and on
behalf of his minor child, C.H.S.; E.M.
on behalf of her minor child, C.M.;
M.M., individually and on behalf of
K.M.; L.G., individually and on behalf
of her minor child, T.M.; E.P.,
individually and on behalf of her minor
child, Ea.P.; and on behalf of ALL
OTHERS SIMILARLY SITUATED,
Plaintiffs,

Civil Action No. 19-cv-12807

**NOTICE OF JOINT MOTION
TO APPROVE COMPLIANCE
MONITOR**

v.

NEW JERSEY DEPARTMENT OF
EDUCATION; KEVIN DEHMER,
Interim Commissioner of Education, in
his official capacity,
Defendants.

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that as soon as counsel may be heard, Plaintiffs
and Defendants, by and through their respective counsel, hereby jointly
respectfully request that this Court enter an Order approving Lenore Knudtson of
Pingoga Consulting, LLC as the Compliance Monitor in accordance with the

parties' Consent Order and Settlement Agreement (Settlement Agreement). In support of this motion, the parties hereby stipulate and consent as follows:

1. On December 18, 2023, this Court entered an Order preliminarily approving the Settlement Agreement of the parties. ECF No. 549.
2. On March 11, 2024, Plaintiffs filed an Unopposed Motion to Approve the Consent Order and Settlement Agreement.
3. One of the elements of the Settlement Agreement is to employ a Compliance Monitor to track the progress of compliance with the terms of the settlement. *See* ECF No. 546-2, pp. 16-23.
4. Specifically, the Settlement Agreement contemplates the Court appointing a Monitor that the parties agree upon. *See* ECF No. 546-2, p. 16, ¶14.
5. The parties have agreed upon Lenore Knudtson of Pingora Consulting, LLC to be the Compliance Monitor in accordance with the Settlement Agreement and whose qualifications justify such selection. A true and correct copy of Ms. Knudtson's curriculum vitae is attached hereto as Exhibit A.

WHEREFORE, the parties jointly request that this Court enter an Order appointing Lenore Knudtson of Pingora Consulting, LLC as Compliance Monitor in this matter.

Dated: March 12, 2024

Respectfully submitted,

/s/ Catherine Merino Reisman
Catherine Merino Resiman
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/s/ Matthew Lynch
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Class Counsel

LENORE KNUDTSON

Attorney at Law

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Career Summary

I began my career as a school psychologist working with school teams, parents, and children with disabilities. As a special education attorney and partner at Pingora Consulting, LLC, I provide consultation, training, and technical assistance to states from coast to coast. I also serve as a mediator, complaint investigator, and hearing officer in several states and speak to audiences across the nation on special education law and compliance.

Legal and Professional Experience

July 2012 to Present

Education Consultant • Pingora Consulting • Lander, Wyoming

Technical assistance in special education law and dispute resolution nationally
Professional development in special education, Section 504, and dispute resolution
IDEA facilitator, mediator, compliant investigator, due process hearing officer

May 2006 to Present

Attorney • Knudtson Law, LLC • Kingman, AZ

Legal Consultation in all aspects of IDEA Special Education and Section 504

June 2005–Present

Program Specialist/Consultant • Utah State University, Technical Assistance for Excellence in Special Education • Logan, UT

Facilitate workgroups for IDEA mediators, complaint investigators, and hearing officers
Provide IDEA and Section 504 technical and legal assistance

August 2005–February 2006

Attorney • Mohave County Attorney • Kingman, AZ

Represent indigent clients in juvenile court

February 2004–August 2005

Managing Attorney • Community Legal Services • Kingman, AZ

Provide indigent civil legal representation, including family law and custody
Provide training and outreach to various community groups and individuals

March 1997–December 2004

Solo Practitioner • Knudtson Law Office • Grantsburg, WI

Represent children with special education needs under the IDEA
Serve as a contract Public Defender, representing juveniles

September 2000–August 2003

Assistant General Counsel • St. Croix Chippewa Indians of Wisconsin • Hertel, WI

Provide legal advice and representation to Tribal Council and Tribal enterprises
Advocate for tribal youth under the IDEA

1996 through 2000

IDEA Compliance Officer • Minnesota Department of Education • St. Paul, MN
Investigate IDEA complaints and draft state level decisions

1987 through 1995

School Psychologist • South Washington County Schools • Cottage Grove, MN

Education

Juris Doctor, Cum Laude

William Mitchell College of Law
St. Paul, MN
Honors Graduate

Master of Science in Education
School Psychology
University of Wisconsin
River Falls, WI
School Psychologist licensure

Bachelor of Arts
Honors Graduate
Ball State University, Muncie, IN

Bar Admissions

Arizona
Inactive in MN and WI

Certifications

Certified Advanced Mediator

Professional Highlights

Senior Consultant

The Center for Appropriate Dispute Resolution in Special Education (CADRE)

National and State Presenter

LRP National Institute 2015, 2021, 2022	National Academy for IDEA ALJs and Hearing Officers 2023
CADRE Conference 2017, 2020, 2021, 2022, 2023	Wyoming Special Education Leadership Symposium since 2008
Utah Special Education Law Institute and Preconference since 2010	Northern Plains Special Education Law Conference since 2015
Tri-State Special Education Law Conference 2013, 2020 - 2022	BIE Regional and National Conferences on Dispute Resolution
National Counsel of State Education Attorneys 2022	National Council of State Education Attorneys 2022

National and State Trainer

Conflict Resolution – “IEP Team Building and Conflict Resolution Skills”	Facilitation – “IEP Facilitation” 3-day certification and “Train for the Trainer”
Mediation – “IDEA Mediation and Skill Refresher”	Complaint Investigator – “IDEA Complaint Investigators”
Virgin Islands Department of Education – Hearing Officer and Mediator Training	Michigan Department of Education ALJ Systems, Complaint Investigators
Florida Department of Education – Complaint Investigators	Nebraska Department of Education – Hearing Officer
National Academy of IDEA ALJs and Hearing officer – Expedited Due Process	Ohio Department of Education – Complaint Investigator, Hearing Officer
Colorado Department of Education – IDEA Due Process Hearing Officers, Complaint Investigators and Mediators	Wyoming Department of Education – IDEA Due Process Hearing Officers, Complaint Investigators and Mediators, IDEA compliance
Massachusetts Department of Elementary and Secondary Education Complaint Investigator, Hearing Officer Training	New Mexico Public Education Department - IDEA Due Process Hearing Officers, Complaint Investigators and Mediators
Arkansas Department of Education - IDEA Hearing Officers	Alabama State Department of Education – Complaint Investigators

National Quarterly Dispute Resolution Workgroups

Due Process ALJs and Hearing Officers	State Complaint Investigators
IDEA Mediators	IEP Team Facilitators

IDEA Dispute Resolution Consultant/Investigator/Mediator

Minnesota Department of Education	Utah State Board of Education
Wyoming Department of Education	Georgia Department of Education
Bureau of Indian Education	Colorado Department of Education
Michigan Department of Education	Montana Office of Public Instruction
Florida Department of Education	New Mexico Public Education Department

Monitoring

Bureau of Indian Education Court-appointed Section 504 Monitor	Georgia Department of Education Special Education Monitoring
Wyoming Department of Education	Texas Education Agency
IDEA General Supervision Special Monitoring	IDEA General Supervision Monitoring System Development

Ongoing IDEA Technical Assistance

The Center for Technical Assistance for Excellence in Special Education (TAESE) – Quarterly Dispute Resolution Workgroups for Hearing Officers, Complaint Investigators, Mediators, and Facilitators	Wyoming Department of Education - IDEA Compliance and Dispute Resolution
Michigan Department of Education – IDEA Compliance and Dispute Resolution	Florida Department of Education – IDEA Compliance and Dispute Resolution and develop guidance documents
New Mexico Public Education Department – IDEA Compliance and Dispute Resolution	Virgin Islands Department of Education – IDEA Compliance and Dispute Resolution and drafting Special Education Rules and Procedures
Massachusetts Department of Elementary and Secondary Education Develop IDEA Dispute Resolution Manual	Kentucky Department of Education – IDEA Compliance and Dispute Resolution

Authorship

Special Education Leadership, The Conflict Continuum, Weaver & Knudtson, 2019.	Contributor to LRP Special Ed. Connections 2014, 2015, 2017, 2021, 2022
DisciplineMAP, Knudtson & Weaver	Section504MAP, Knudtson & Weaver

CERTIFICATE OF SERVICE

I, Catherine Merino Reisman, certify that I served all parties and counsel of record the Joint Motion to Approve Compliance Monitor by causing the same to be sent via the ECF system on the date indicated below.

Dated: March 12, 2024

/s/ Catherine Merino Reisman
Catherine Merino Reisman