

Office of School Board Attorney  
Walter J. Harvey, School Board Attorney

**SUBJECT: PROVISION OF LEGAL REPRESENTATION FOR THE FOLLOWING  
MATTER: Suzy Milano v. School Board Miami Dade County, Florida  
and Ava Goldman, Case No. 13-23961-CIV- Gayles**

This lawsuit was filed on October 31, 2013. On October 2, 2014, the Court granted Plaintiff's motion to amend her Complaint and to join additional parties. As a result, on October 10, 2014, the Court issued a Summons for a newly added individual Defendant in this case. In her Amended Complaint, the Plaintiff alleges, among other things, that she was subjected to disparate discipline when her annual contract of employment was not renewed by the School Board, and that Defendants violated her liberty interest when the circumstances of her dismissal from employment were made public.

In accordance with the District's established practice, the individually named Defendant has formally requested that the School Board provide her with legal representation. The acts alleged in Plaintiff's Complaint arose out of and in the course of the performance of assigned duties and responsibilities of the individually-named employee.

Pursuant to School Board Policy 6900, *Legal Services for Employees of the Board* and § 1012.26 Fla. Stat. (2014), we are requesting that the School Board authorize the provision of legal representation for the individually named Defendant in the above-captioned lawsuit. In the interim, while the allegations against the individually-named Defendant do not appear to have any merit, the Board Attorney's office will be filing the necessary documents with the Court to protect the Defendants' legal interests.

**RECOMMENDED:** That the School Board of Miami-Dade County, Florida, authorize the office of the School Board Attorney to provide or secure legal representation for the legal defense of the current School Board employee who is individually named as a defendant in the case of *Suzy Milano v. School Board Miami Dade County, Florida and Ava Goldman*, Case No. 13-23961-CIV- Gayles.