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INTRODUCTION AND SUMMARY OF ARGUMENT

ARGUMENT

I. THE STATUTE'S PLAIN TEXT REQUIRES COLLABORATION THROUGH AND INCLUDING EXHAUSTION.

See, e.g.

See

The Mandatory Resolution Meeting or Mediation Encourages Collaborative Solutions to Disputes.

Id

See e.g Marinette Sch Dist

Beaverton -12

3. Exhaustion Permits Local Education Agencies to Remedy Problems Within the Collaborative Framework.

See *An IDEA Gone Out of Control: Covington v. Knox County School Board*

B. Exhaustion Promotes Judicial Efficiency Through the Creation of a Thorough Administrative Record.

C. The Civil Litigation Process Undermines the IDEA's Collaborative Framework.

See, e.g., Doe v. Cape Elizabeth Sch. Dept *Regional Sch. Unit No. 51 v. Doe* *Elida Local Sch. Dist. Bd. of Educ. v. Erickson*

Issues in Pretrial Litigation: Forward: Pretrial Litigation,

1. Discovery Under Rule 26 Impedes the IDEA's Collaborative Scheme.

See

Perez v. Sturgis Public School

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Id. *Reid v.*
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See also Sch. Comm. of Burlington v. Dep't of Educ.

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See, e.g *T.Y. v. New York City Dep't of Educ.* *Cobb Co. Sch. Dist. v. A.V.* *Dep't of Educ. v. M.F.*

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not

Id

CONCLUSION

Counsel of Record