

Annotated Bibliography

Primary Sources

"40th Anniversary of Plyler V. Doe." *MALDEF.org*,

www.maldef.org/resources/40th-anniversary-of-plyler-v-doe/. Accessed 7 Dec. 2024.

This audio collection, compiled by the Mexican American Legal Defense and Educational Fund, featured interviews with people who received the benefits of Plyler v. Doe's ruling, discussing their lives and success in their careers after primary and secondary education. This helped us understand the impact Plyler v. Doe's ruling had on individual lives, rather than statistical evidence about the entire demographic that the case benefits.

"APM Reports: Shadow Class - College Dreamers in Trump's America, part 1." Performance by James Plyler et al. *AMP Reports: Shadow Class*, Minnesota Public Radio, 11 Sept. 2017.

This radio episode, produced by Minnesota Public Radio, featured an interview with Plyler v. Doe's plaintiffs' grown children who were excluded from the Tyler Independent School District and James Plyler, providing that "The case created a new generation of immigrants who know America from the inside." This helped us understand the broad impact of Plyler v. Doe's ruling holds on a multi-generational scale of undocumented children in the United States.

Bouvier, Leon F., and John L. Martin. "Shaping Texas: The Effects of Immigration, 1970-2020."

Center for Immigration Studies, 1 Apr. 1995,

cis.org/Report/Shaping-Texas-Effects-Immigration-19702020. Accessed 23 Mar. 2025.

This report from the Center for Immigration Studies examined the effects of immigration on Texas from the 1960s to the 2000s, detailing demographic shifts,

including legal and undocumented populations and their countries of origin. Its Texas-specific focus was especially valuable in understanding the context of *Plyler v. Doe* and the prominent Mexican population.

Burger Court (1981-1986). Oyez, www.oyez.org/court/15326/burger8. Accessed 2 Feb. 2025.

This page from Oyez provided a picture of the Burger Court (1981-1986), which included all the Justices who presided on *Plyler v. Doe*. We used this picture in our "Supreme Court Case" page.

Burke, Lindsay M. "The Conservative Promise: 2025 Presidential Transition Project." *Static Project 2025*. Accessed 28 Mar. 2025.

This document from the Department of Homeland Security's Static Project 2025 highlighted many of the attitudes and policies threatening the rights of undocumented immigrants, including proposals to cut funding for schools that support them and deny student loans to those attending institutions with in-state tuition for undocumented students. This was critical in understanding the ongoing efforts from the Trump Administration to challenge the protections established by *Plyler v. Doe*, which was crucial in creating our "Legacy" page and understanding present threats to the right to education for undocumented children.

Chapman Jr., Leonard F. "Illegal Immigrants: Time to Call a Halt!" *The Reader's Digest*, vol. 109, no. 654, Oct. 1976, pp. 187-88.

This *Reader's Digest* article provided a quote from the INS commissioner describing the "growing invasion of illegal aliens," which helped us understand the attitudes, fears, and political climate surrounding undocumented immigrants at

the time. We included this quote in our "Background" page to show the rhetoric that influenced policies like Section 21.031.

"Circuit Assignments." *Supreme Court of the United States*,

www.supremecourt.gov/about/circuitassignments.aspx. Accessed 4 Jan. 2025.

We used this page from the Supreme Court website to help us understand how the appellate system worked and what specific assignment Texas had. This information was important when creating our "Lower Courts" page.

Dallas Times Herald, et al. Memo to William Wayne Justice. 15 Sept. 1978. *Tarlon Law Library*:

The William Wayne Justice Papers,

tarltonapps.law.utexas.edu/exhibits/ww_justice/documents_2/Plyler_letter_3_1978.pdf.

Accessed 25 Mar. 2025.

This letter to William Wayne Justice, following his *Plyler* ruling, highlighted the intense opposition and how polarizing the issue was at the time. It was fascinating to see the public's reasoning and reactions, and how this compared to many of the arguments being made today.

Daves, Larry. "Interview with Larry Daves - part 3." *Interview with Larry Daves*, Texas After Violence Project, 2008. Interview.

This interview with Larry Daves from the Texas After Violence Project provided insight into his personal experiences and admiration for undocumented immigrants and their bravery. He also discussed what compelled him to work on the *Plyler* case.

"Education of Non-resident Children: Doe v. Plyler." *Tarlton Law Library*, 20 Sept. 1978, tarlton.law.utexas.edu/william-wayne-justice/doe-v-plyler. Accessed 13 Jan. 2025.

This page on the Tarlton Law Library gave us access to several letters to William Wayne Justice, both approving and disapproving of his ruling on *Plyler*. This answered our initial questions about public opinion on the case and provided insight into both sides of the argument; with it, we were able to draw parallels between perspectives during the case and today.

Executive Director of the National Immigration Law Center, Marielena Hincapié, "DACA Recipients, Broad Coalition of Immigrants' Rights Organizations Launch 'Home Is Here' Campaign Ahead of Crucial Supreme Court Hearing." *National Immigration Law Center*, 2 Oct. 2019, www.nilc.org/press/daca-recipients-broad-coalition-of-immigrants-rights-organizations-launch-home-is-here-campaign-ahead-of-crucial-supreme-court-hearing/. Accessed 8 Dec. 2024. Interview.

This compilation of interviews from heads of immigration and progress organizations features powerful clips highlighting DACA's importance in maintaining the fabric of American society. We used these quotes and insights to build our "Legacy" page and understand how DACA recipients play a vital role in supporting the nation.

"Fact Sheet: Deferred Action for Childhood Arrivals (DACA)." *National Immigration Forum*, May 2024, immigrationforum.org/article/fact-sheet-on-deferred-action-for-childhood-arrivals-daca/. Accessed 14 Dec. 2024.

This Fact Sheet provided us with several statistics about the number of Dreamers currently residing in the United States, which was very important in understanding the impact of *Plyler*.

"Henry A. Politz Scholarship." *LSU Law*, law.lsu.edu/alumni/scholarship/1287/. Accessed 28 Mar. 2025.

This article provided us with a picture of Judge Henry A. Politz, who was one of the three judges who presided over *Plyler v. Doe* at the Court of Appeals level. We used this photo in our "Lower Courts" page.

Hoover, Nancy. "States Target Plyler Court Ruling on Educating Immigrant Children." *The New Yorker*, 12 Feb. 2025, www.wsns.org/en/articles/2025/02/12/odic-f12.html. Accessed 20 Feb. 2025.

This article provided us with a quote from Justice Brennan talking about the permanent and damaging underclass that would result from barring a specific

group of people from school. It also outlined specific efforts from several states to undermine the ruling. This information helped us create our "Legacy" and "Supreme Court Case" pages.

Immigration and Naturalization: Fig. VII. Immigrants Admitted: 1950 to 1960. 1960. United States Census Bureau,

www2.census.gov/library/publications/1961/compendia/statab/82ed/1961-03.pdf.

Accessed 1 Apr. 2025. Chart.

This graph from the United States Census Bureau shows the total number of immigrants in the U.S. compared to the number of authorized immigrants from the 1950s to the 1960s. We used this graph in our "Background" page to explain the effects of the U.S. visa quotas on increasing the number of illegal immigrants in the U.S by closing the legal avenues.

"Judge David W. Dyer-Historical Video Series." *YouTube*, uploaded by TBF Center for Professionalism, www.youtube.com/watch?v=y0J8_ejpmxI. Accessed 28 Mar. 2025.

This video provided us with a picture of Judge David W. Dyer, one of the three judges who presided over *Plyler v. Doe* at the court of appeals level. We used this photo in our "Lower Courts" page.

"Judge Frank M. Johnson, Jr. Institute." *The Johnson Institute*,

www.thejohnsoninstitute.org/about-judge-johnson. Accessed 28 Mar. 2025.

This article provided us with a picture of Judge Frank M. Johnson, Jr, who was one of the three judges who presided over *Plyler v. Doe* at the court of appeals level. We used this photo in our "Lower Courts" page.

"Key Facts on Deferred Action for Childhood Arrivals (DACA)." *Kaiser Family Foundation*, 11 Feb. 2025,

www.kff.org/racial-equity-and-health-policy/fact-sheet/key-facts-on-deferred-action-for-childhood-arrivals-daca/#:~:text=Overview%20of%20DACA,-DACA%20was%20originally&text=The%20program%20has%20enabled%20over,to%20the%20economy%20through%20employment. Accessed 21 Feb. 2025.

This fact sheet from the Kaiser Family Foundation had results of an independent polling done on current DACA recipients, covering an estimated number of DACA recipients, where they predominantly live, and their country of origin.

This statistical information helped us understand the scope of Plyler's later impact on undocumented communities.

"Mapping the Impact of Immigration on Public Schools." *Center for Immigration Studies*, 2023, cis.org/Report/Mapping-Impact-Immigration-Public-Schools. Accessed 3 Dec. 2024.

This map showed us the distribution of immigrant populations throughout each state, which helped us understand more about Texas specifically and create our background page.

Passel, Jeffrey J., and Jens Krogstad. "Unauthorized Immigrant Population: National and State Trends, 2010." *Pew Research Center*, 22 July 2024, www.pewresearch.org/short-reads/2024/07/22/what-we-know-about-unauthorized-immigrants-living-in-the-us/. Accessed 2 Feb. 2025.

This collection of statistics from the Pew Research Center provided us with data on undocumented immigrants in the U.S as of 2024, analyzing population trends, labor force participation, and shifts in demographics. This helped us understand the different factors that influence undocumented immigration as well as the specific demographics of this population.

Passel, Jeffrey S., and Jens Manuel Krogstad. "What We Know about Unauthorized Immigrants Living in the U.S." *Pew Research Center*, 22 July 2024, www.pewresearch.org/short-reads/2024/07/22/what-we-know-about-unauthorized-immigrants-living-in-the-us/#:~:text=About%204.4%20million%20U.S.%2Dborn,are%20unauthorized%20immigrants%20in%202022. Accessed 5 Feb. 2025.

This report from Pew Research Center helped us understand recent trends in undocumented immigrant populations, helping us frame the current significance of *Plyler v. Doe* and understand the ongoing debates surrounding undocumented immigrants' rights that make this court case all the more relevant.

Plyler, James. Interview. *Edweek.org*, 4 June 2007, www.edweek.org/policy-politics/case-touched-many-parts-of-community/2007/06. Accessed 6 Dec. 2024.

This article contains an interview with James Plyler, who offered the valuable information that the \$1000 fee was not a feasible option for undocumented

immigrants, effectively barring them from attending school. We used this audio clip on our "Initiating a Case" page to highlight the barriers leading to the lawsuit.

Texas State, Legislature. Tex. Educ. Code Ann. Section 21.031, 1975.

Section 21.031 in the Texas Education Code of 1975 (annotated) provides that the State will terminate funds toward undocumented pupils attending Texas public schools. The section was fundamental in understanding on what grounds the plaintiffs were filing a lawsuit and creating our entire project.

"Unauthorized Migrants: Numbers and Characteristics." *Pew Research Center*, 14 June 2005, www.pewresearch.org/race-and-ethnicity/2005/06/14/unauthorized-migrants/.

This independent study conducted by Pew Research Center highlighted trends between undocumented people, their access to education, and annual income after receiving said education. We learned that people who did not receive or were not able to access a high-quality education, overall, earned less money and were in working-class jobs.

United States, U.S. Supreme Court (U.S.). *Doe v. Plyler*. Docket no. 80-1538. *Oyez*, www.oyez.org/cases/1981/80-1538. Accessed 8 Feb. 2025.

This oral argument of *Plyler v. Doe* in the Supreme Court, found in the *Oyez* databases, provided the appellants' and appellees' main arguments. This helped us in understanding what rights of the plaintiff class were being violated and the defendant's rationale for the constitutionality of Section 21.031, both of which we included in our "Supreme Court Case" page.

---, ---. *Roos v. Plyler*. Docket no. 80-1538, 15 June 1982. *Justia.com*, supreme.justia.com/cases/federal/us/457/202/#216. Accessed 1 Dec. 2024.

This docket from Justia included all the facts, direct quotes, parties, dates, and times of *Plyler v. Doe*. This was absolutely vital in our knowledge of the case and the perspectives on the bench.

US Constitution. Amendment XIV, cl. Equal Protection Clause.

Because *Plyler v. Doe* focused on whether Section 21.031 violated the Equal Protection Clause of the 14th Amendment, it was important to look at this clause to better understand the Court's ruling and grasp the core issues of the case.

"What We Know About DACA Recipients in the United States." *Center for American Progress (CAP)* 20, www.americanprogress.org/article/know-daca-recipients-united-states/.

This article provided data and statistics that highlighted the impact of DACA in enabling millions of Dreamers to continue their education, pursue careers, and contribute to the economy. Knowing this was key in understanding how DACA has extended the educational benefits of *Plyler*, which greatly helped shape our "Legacy" page.

Winter, Catherine. "A Supreme Court Case 35 Years Ago Yields a Supply of Emboldened DACA Students Today." *AMP Reports*, 21 Aug. 2017, www.apmreports.org/story/2017/08/21/plyler-doe-daca-students. Accessed 23 Jan. 2025.

This article was one of our most helpful sources. It provided us with photos and key quotes from the plaintiffs that showed the more personal side of the case and the real lives, fears, and motives behind the legal battle. It also presented a comprehensive story about how the case came to be, which helped guide us when creating our "Initiating a Case" page.

Secondary Sources

"Access to Education - Rule of Law." *United States Courts*,

www.uscourts.gov/educational-resources/educational-activities/access-education-rule-law. Accessed 11 Feb. 2025.

This web page, published by the United States Courts, explained how *Plyler v. Doe* and other landmark Supreme Court cases like *Brown v. Board* shaped the fight for equal access to education by the rule of law. This showed us where *Plyler v. Doe* lies in the current struggle for equal and accessible education for all children.

"Appeals Court Rules against Obama-era Policy to Shield Immigrants Who Came to US as

Young Children." *AP News*, 17 Jan. 2025,

apnews.com/article/daca-immigration-trump-deferred-action-obama-1302d284b9c4bdf3b4a5aa6a2a155e56. Accessed 4 Feb. 2025.

Knowing that DACA had been in legal limbo for the past few years, this article provided us with the program's current status as of January 2025, which helped our information on the "Legacy" page be accurate.

"At Least 600,000 K-12 Undocumented Students Need a Pathway to Citizenship." *FWD.us*, Inc.,

19 Aug. 2021, www.fwd.us/news/k-12-undocumented-students/. Accessed 24 Feb. 2025.

This research provided us with several statistics concerning the number of undocumented K-12 students in the U.S. and their eligibility to apply for DACA.

This information was extremely useful in understanding the extent of *Plyler's* impact and helped us when creating our "Legacy" page.

"Attorney General's Advisory Regarding Equal Access to Public Education for All Students Irrespective of Immigration Status." *Commonwealth of Massachusetts*, mass.gov, www.mass.gov/info-details/attorney-generals-advisory-regarding-equal-access-to-public-education-for-all-students-irrespective-of-immigration-status. Accessed 11 Jan. 2025.

This advisory from the Massachusetts Attorney General's Office provided us with a quote from *Brown v. Board of Education*. This quote, which we used in our "Legacy" page, nailed down the significance of education and how absolutely essential it is for allowing individuals to participate in society and succeed in life. This helped underscore the significance of *Plyler v. Doe* in securing such an impactful and fundamental right.

Belejack, Barbara. "A Lesson in Equal Protection." *The Texas Observer*, 13 July 2007, www.texasobserver.org/2548-a-lesson-in-equal-protection-the-texas-cases-that-opened-the-schoolhouse-door-to-undocumented-immigrant-children/. Accessed 1 Feb. 2025.

This article, written by Barbara Belejack OR published by The Texas Observer, covers small works of lesser-known individuals in propelling the plaintiffs to adequate legal support. This betters our understanding of how the class action was originally filed and the key players in bringing the case to the District Court.

Clarke, Kristen, and Catherine E. Lhamon. "Departments of Justice and Education Mark 40th Anniversary of *Plyler v. Doe*." 15 June 2022, Washington, DC. Speech.

In this speech made by the heads, respectively, of the Department of Justice and Department of Education, the speakers highlight the importance of *Plyler's* ruling

in ensuring generations prior and generations to come of undocumented children receive an education and are able to give back to the country. This bettered our understanding of the role education plays in enabling people to give back to their community and country.

Coleman, Sarah. "The Rose's Sharp Thorn: Texas and the Rise of Unauthorized Immigrant Education Activism." *The Walls Within: The Politics of Immigration in Modern America*, New Jersey, Princeton University Press, 2021, pp. 13-31.

This book provided us with more background on the social and political climate of *Plyler v. Doe*, highlighting how divisive the topic was and how locals of Tyler, Texas, viewed the issue. This was especially important information when creating our "Background" page.

"Consideration of Deferred Action for Childhood Arrivals (DACA)." *U.S. Citizenship and Immigration Services*, www.uscis.gov/DACA. Accessed 8 Dec. 2024.

This fact sheet provided by U.S. Citizenship and Immigration Services covers the requirements needed to apply for Differed Action for Childhood Arrivals, one requirement is that applicants must have an American high school diploma. In discovering this, we learned how integrated Plyler v. Doe's ruling is in both undocumented children's education, but also paths to citizenship and futures as legal residents of the United States.

"Consideration of Deferred Action for Childhood Arrivals (DACA)." *U.S. Citizenship and Immigration Services*,

www.uscis.gov/DACA#:~:text=Age%20Guidelines,after%20June%2016%2C%201981.
Accessed 23 Feb. 2025.

This page contains the latest updates on DACA. We learned that, as of January 17th, the Court of Appeals ruled that USCIS will keep accepting initial requests but will not continue to process them, information which was important to know, as DACA has been in limbo for a while.

Feinberg, Joseph R., and Matthew S. Hollstein. "Equal Protection, Immigration, and Education: *Plyler v. Doe*." *National Council for the Social Studies*, 2014,
www.socialstudies.org/system/files/publications/articles/se_7804183.pdf. Accessed 13 Feb. 2025.

This article by the National Council for the Social Studies provided background on *Plyler v. Doe* and explained its connection to the Equal Protection Clause in-depth. It also includes a quote that stood out from Judge William Wayne Justice, where he emphasizes the point that, if it weren't for education, children would have no real means of making a living without being forced into crime. This helped us better understand the idea of the vitality of education in maintaining a functional society, and the immense consequences of withholding it from some.

Fitz, Marshall, et al. "Triumphs and Challenges on the 30th Anniversary of *Plyler v. Doe*." *Center for American Progress*, June 2012,
cdn.americanprogress.org/wp-content/uploads/issues/2012/06/pdf/plyler.pdf. Accessed 20 Feb. 2025.

This was also one of our most insightful sources. This page from the Center for American Progress examined the analytical arguments for *Plyler*, the major challenges leveled against it, and the ongoing arguments on both sides. Finally, they considered what life would be like without *Plyler* and the detriments this would have on millions of children and our nation as a whole. Points like the percentage of families with at least one undocumented immigrant and the social costs of overturning the ruling were critical in understanding the weight and importance of the debate and the impact of *Plyler*.

Greenhouse, Linda. "Breathing While Undocumented." *The New York Times*, 26 Apr. 2010, archive.nytimes.com/opinionator.blogs.nytimes.com/2010/04/26/breathing-while-undocumented/. Accessed 22 Feb. 2025.

This article by Linda Greenhouse, winner of the 1998 Pulitzer Prize and reporter on the Supreme Court, underscored the significance of the *Plyler* ruling, especially in today's climate. This provided us with a quote that we used in our "Legacy" page.

"Immigration and Relocation in U.S History: Mexican." *Library of Congress*, www.loc.gov/classroom-materials/immigration/mexican/. Accessed 11 Jan. 2025.

This passage underscored the long and complex history of Mexican immigration to the United States as well as the legal and social challenges these immigrants faced. Understanding how their influence has changed and the role they now play in the U.S. helped us create our "Background" page.

"A Latinx Resource Guide: Civil Rights Cases and Events in the United States: Plyler v. Doe."

Library of Congress, guides.loc.gov/latinx-civil-rights/plyler-v-doe. Accessed 2 Jan. 2025.

This article provided a comprehensible timeline of *Plyler v. Doe*, from the district courts to the Supreme Court. This was critical in understanding the different levels in which *Plyler v. Doe* was presented, clearly outlining when it was appealed, to which court, and by which party.

Martin, David, et al. *Immigration Stories*. E-book ed., Foundation Press, 2005. *PDF*.

Chapter 8 of the nonfiction book "Immigration Stories" examines efforts by the Immigration and Naturalization Services to intimidate plaintiffs of the *Plyler v. Doe* case into dropping their lawsuit. This helped us better understand the government's willingness to neglect the fundamental rights of anyone not legally admitted into the country, furthering our understanding of systematic xenophobia.

Minian, Ana Raquel. "Undocumented Lives: The Untold Story of Mexican Migration." 18 Mar. 2019, Center for Latin American and Caribbean Studies, University of California, Berkeley. Lecture.

This speech by Ana Minian explored the pressures faced by migrants from their families to go to the U.S, get money, but also return home. This helped us understand public opinion from the migrants' perspective and the struggle feeling like they didn't belong in either country. Ana also talked about the cap put on immigration and the influx of immigration in 1970. All of this was important in understanding the political and social foundations that led to *Plyler v. Doe*.

Najarro, Ileana. "Undocumented Students Have the Right to a Free Education. This Is Why."

Education Week, 2024,

www.edweek.org/policy-politics/undocumented-students-have-the-right-to-a-free-education-on-this-is-why/2024/11. Accessed 29 Nov. 2024.

This article provided a comprehensive overview of *Plyler v. Doe*. It helped us learn more about ongoing debates surrounding the ruling, as well as the fact that undocumented immigrants contribute to public education funding through taxes.

Olivas, Michael A. "Plyler v. Doe." *Texas State Historical Association*,

www.tshaonline.org/handbook/entries/plyler-v-doe. Accessed 4 Feb. 2025.

This research report from the Texas State Historical Association explains that MALDEF took on the *Plyler v. Doe* case as it provided the perfect opportunity to reach the Supreme Court and challenge federal legislation. Despite being approached by seven other lawyers with separate lawsuits against the State of Texas, MALDEF's decision to focus solely on *Plyler v. Doe* underscores the case's significant potential, deepening our understanding of its relevance throughout the entire legal battle.

---. "Plyler v. Doe." *m. Migration Policy Institute*,

www.migrationpolicy.org/article/plyler-v-doe-still-guaranteeing-unauthorized-immigrant-childrens-right-attend-us-public. Accessed 5 Feb. 2025. Excerpt originally published in *Ask Not for Whom the School Bell Tolls, Plyler v. Doe and the Education of Undocumented Children.*, NYU Press, 2012, pp. 1-206.

This article featured in the Migration Policy Institute highlights the current-day relevance of Plyler v. Doe in immigration politics, where parts of Plyler's ruling are being contested and challenged by States and the Federal government. This bettered our understanding about the scope of protection Plyler provides to undocumented school children, acting as a barrier between their access to education and efforts to bar them from school.

"Plyler v. Doe." *Mexican American Legal Defense and Educational Fund*, 1 Dec. 2018,

www.maldef.org/2018/12/plyler-case/. Accessed 5 Nov. 2024.

This page from MALDEF, talking about *Plyler v. Doe*, featured a powerful image of a diverse group of school children holding the American flag. This photo reinforced how, despite their undocumented status, these children were still part of their communities through education and attending school. We chose to include this photo on our homepage.

"Plyler v. Doe." *Mexican American Legal Defense and Educational Fund*, 1 Dec. 2018, www.maldef.org/2018/12/plyler-case/. Accessed 4 Nov. 2024.

This web page article, published by the Mexican American Legal Defense and Educational Fund, provided a comprehensive picture of the basic facts of *Plyler v. Doe*, as well as statements, specifically from the Trump Administration and people like Governor Greg Abbot, that highlight the frequent misconstruing of *Plyler v. Doe* by opponents of the ruling today. This article also provided us with a picture of diverse school children reciting the Pledge of Allegiance, which we used in our "Home" page.

"Plyler v Doe – The Law in Education." *Intercultural Development Research Association*, 24 Feb. 2025, www.idra.org/education_policy/plyler-v-doe-the-law-in-education/. Accessed 25 Feb. 2025.

This article helped us understand the legal precedent set by *Plyler* in establishing what info a school can and can't request. It also provided us with an interview from Dr. Albert Cortez, former IDRA Director of Policy, talking about the social and political climate in Texas at the time and *Plylers'* significance today. This information was important in creating our "Background" page.

Price, Asher. "A Look-back at William Wayne Justice and the Plyler Case." *Axios Austin*, 10 May 2022, www.axios.com/local/austin/2022/05/10/texas-william-wayne-justice-plyler-case. Accessed 8 Jan. 2025.

This article gave us several quotes, primarily from people disapproving of Judge William Wayne Justice's decision on *Plyler v. Doe*. This was really interesting as

the public's reaction was something we were interested in prior, and it helped us understand similarities in today's climate to that of *Plyler's* ruling.

"Public Education for Immigrant Students: Understanding Plyler V. Doe." *American Immigration Council*, 24 Oct. 2016,
www.americanimmigrationcouncil.org/research/plyler-v-doe-public-education-immigrant-students. Accessed 13 Dec. 2024.

This article provided the basic facts of *Plyler v. Doe*, including the basis for the lawsuit and the Supreme Court ruling. This also included why it's important that schools are prevented from collecting and reporting students' immigration status, which was useful in understanding the broader implications of the case on education access.

"Public Education for Immigrant Students: Understanding Plyler v. Doe." *American Immigration Council*, 24 Oct. 2016,
www.americanimmigrationcouncil.org/research/plyler-v-doe-public-education-immigrant-students. Accessed 5 Nov. 2024.

This Fact Sheet from the American Immigration Council explained in-depth the basis for the Supreme Court's ruling and several attempts by states like California and Alabama to undermine this decision. This helped us better understand how *Plyler v. Doe* has been an ongoing safeguard for the educational rights of undocumented immigrants, as well as the challenges it continues to face today.

Risedorf, Jordan. "Justice, William Wayne (1920–2009)." *Texas State Historical Association*,
www.tshaonline.org/handbook/entries/justice-william-wayne. Accessed 24 Feb. 2025.

This was a biography of Justice William Wayne, the judge at the district court level of *Plyler v. Doe*, from the Texas State Historical Association. We learned more about his prior rulings, public perception as a result of these rulings, judicial philosophies, and the dramatic shaping of Texas politics and law.

Romero, Anthony D. "School is for Everyone: Celebrating Plyler v. Doe." *ACLU*, 11 June 2012, www.aclu.org/news/immigrants-rights/school-everyone-celebrating-plyler-v-doe. Accessed 2 Jan. 2025.

This article primarily focused on *Plyler's* impact today and establishment that due process and equal protection extend to all individuals in the United States. This was very important in our "Legacy" page.

Ross, Alexander. "Doe v. Plyler - Post-Trial Brief of the United States." *Civil Rights Litigation Clearinghouse*, clearinghouse.net/doc/93855/. Accessed 1 Mar. 2025.

This amicus curiae brief presented by Alexander Ross provides an in-depth explanation of the implications of Texas Education Code Section 21.031 in perpetuating an underclass of uneducated population and the importance of education for any child's future. This furthered our understanding of Section 21.031 by highlighting the detrimental long-term effects the statute would have, had it held constitutional.

Shashkevich, Alex. "Stanford scholar examines the spike in unauthorized Mexican migration in the 1970s and how it came about." *Stanford Report*, 2018. *Stanford Report*,

news.stanford.edu/stories/2018/05/analyzing-undocumented-mexican-migration-u-s-1970s#:~:text=Like%20today%2C%20during%20the%201970s,often%20the%20victims%20of%20crime. Accessed 12 Dec. 2024.

This article, published by the Stanford Report, highlights the stereotyping of undocumented immigrants during the 1970s, in that they abused the welfare system, took citizens' jobs, and were criminals. This harmful, yet ubiquitous, misconception of undocumented people dissuaded legislators from pushing for the protection of their rights due to the majority of the public opposed undocumented immigrants' presence in the United States.

Silva, Daniella. "Betsy DeVos Slammed for Saying Schools Can Choose to Report Undocumented Students." *NBC News*, 23 May 2018, www.nbcnews.com/news/latino/betsy-devos-slammed-saying-schools-can-choose-report-undocumented-students-n876826. Accessed 10 Feb. 2025.

We found this article while searching for ongoing threats to *Plyler v. Doe*. Betsy DeVos, former Secretary of Education, is an example of these attempts to undermine the ruling by suggesting that schools could choose to report undocumented immigrants. This was important in shaping our legacy page and understanding the current climate and persistent challenges to the protections established by *Plyler*.

"Undocumented Immigrant Students and Higher Education: A Houston Study." *University of Houston Law Center*, www.law.uh.edu/ihelg/monograph/90-10.pdf. Accessed 25 Nov. 2024.

This independent study conducted by the University of Houston Law Center in 1991 explained how a new subclass of undocumented students, who have been raised in America their whole lives, emerged after they had the new option to seek higher education. This bettered our understanding of Plyler's impact on socioeconomic classes as undocumented people have access to a K-12 education through its ruling, and are able to attend college.

"Undocumented Students in Higher Education (Updated August 2024)." *Higher Education Immigration Portal*, 2 Aug. 2023, www.higheredimmigrationportal.org/research/undocumented-students-in-higher-education-updated-march-2021/. Accessed 2 Feb. 2025.

This article from the Higher Ed Immigration Portal provided statistics for the number of undocumented students enrolled in Higher Education as of 2024. This information was important in understanding how many people benefit from programs like DACA and, by extension, *Plyler v. Doe*.

U.S. Department of Justice and U.S. Department of Education. Letter to Public Schools. 8 May 2014. *Department of Education*, www.aclu.org/wp-content/uploads/document/DOJ-DOE_re_Plyler_May_2011.pdf. Accessed 5 Jan. 2025.

This letter from the U.S. Department of Justice and the U.S. Department of Education reminds all public school districts across the United States of the

legality of Plyler's ruling, that no child could be denied a free and accessible education, irrespective of their immigration status. This bettered our understanding of how integrated Plyler's ruling is in education policy and immigration.

"U.S. Immigration Since 1965." *History*, 5 Mar. 2010, [history.com/topics/immigration/us-immigration-since-1965](https://www.history.com/topics/immigration/us-immigration-since-1965). Accessed 2 Feb. 2025.

This web page article, accessed through History, chronologically covers government initiatives, educational prospects, and migration incentives for people to immigrate to the United States. This bettered our understanding of immigrants' reasons for emigrating.

"The William Wayne Justice Papers." *Tarlton Law Library*, University of Texas, tarlton.law.utexas.edu/william-wayne-justice/doe-v-plyler. Accessed 17 Feb. 2025.

This page in the Tarlton Law Library provided the links to several letters sent to William Wayne Justice following his decision. It was interesting to see the opinions of those both in approval and disapproval of the ruling, giving us a sense of the public response to the lawsuit at that time, and how controversial and divisive the topic still is.

Wong, Tom K., et al. "DACA Boosts Recipients' Well-Being and Economic Contributions: 2022 Survey Results." *Center for American Progress*, 27 Apr. 2023, www.americanprogress.org/article/daca-boosts-recipients-well-being-and-economic-contributions-2022-survey-results/. Accessed 22 Feb. 2025.

This article presents data on DACA's impact, demonstrating improvement in its recipients' employment, education, and economic stability. It also touched on the

legal challenges faced by DACA in recent years, and overall, helped us understand the significance of this program in reinforcing access to education and providing opportunities.

Najarro, Ileana, and Daniela Franco Brown. "Which States Are Challenging Undocumented Students' Right to Free Education?" *Education Week*, 17 Mar. 2025, www.edweek.org/policy-politics/which-states-are-challenging-undocumented-students-right-to-free-education/2025/03. Accessed 12 May 2025.

This analysis, conducted by Education Week, provided an overview of the most recent developments in legal opposition directly against *Plyler v. Doe*. We used this information to update our Legacy page to the most recent status of the case and efforts to overturn it.