

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

JOYCE MARIE MOORE, ET AL.,
Plaintiffs,

CIVIL ACTION NO.: 65-15556

VERSUS

SECTION 'B'(1)

TANGIPAHOA PARISH SCHOOL BOARD,
Defendant.

JUDGE: IVAN L. R. LEMELLE

MOTION FOR COURT APPROVAL OF CERTAIN REPAIRS TO SCHOOLS

NOW INTO COURT, through undersigned counsel, comes Defendant Tangipahoa Parish School Board who moves the court for the entry of an order approving needed expenditures for repairs to Westside Middle School, Hammond Eastside Elementary School, and Ponchatoula High School. The nature of the repairs and estimated costs are detailed below, as follows:

1.

The repairs and replacements at Westside Middle School consist of replacement of exterior hollow metal doors, frames and hardware, as well as the installation of new flooring at the main administrative entrance and entry into the gymnasium. The projects are estimated to cost approximately \$154,730.60. Attached as Exhibit "A" is Glenn Tregre's October 27, 2008, letter to Ron Caruso with an attached project probable cost analysis. Mr. Tregre is an architect with Holly and Smith Architects.

2.

The project at Hammond Eastside Elementary School consists of replacement of the cooling tower. It is anticipated that the cost of the project will be approximately \$477,282. Attached as Exhibit "B" is a memorandum from Pascal LaMarca to Ron Caruso with an attached project probable cost analysis by Henry C. Eyre, Jr., P.E., Consulting Engineer.

3.

The field track at Ponchatoula High School is in need of resurfacing. In areas, the track surface is no longer present and bare concrete is visible. In other areas, the surface is not of sufficient depth. The resurfacing of the track is estimated to cost approximately \$186,390.90. Attached as Exhibit "C" is Glenn Tregre's letter of November 20, 2008, to Pascal LaMarca setting for an attached probable cost analysis.

4.

The foregoing information contained in the exhibits attached hereto was previously presented to counsel for plaintiffs. Plaintiffs' counsel has advised that plaintiffs will interpose objections to the projects set forth above.

5.

Testimony will be offered by defendant at hearing in support of this motion.

WHEREFORE, after due proceedings are had, Defendant Tangipahoa Parish School Board prays that an order be entered herein approving the foregoing described projects and related expenditures.

s/ Charles L. Patin, Jr.

Charles L. Patin, Jr. (La. Bar # 10338)
KEAN, MILLER, HAWTHORNE, D'ARMOND,
McCOWAN & JARMAN, L.L.P.
One American Place, 18th Floor
Post Office Box 3513 (70821)
Baton Rouge, LA 70825
Telephone: 225-387-0999

s/ Alton B. Lewis, Jr.

Alton B. Lewis, Jr. (La. Bar # 8772)
CASHE, LEWIS, COUDRAIN & SANDAGE
106 South Magnolia Street
Post Office Drawer 1509

Hammond, LA 70404-1509
Telephone: 985-542-6848

Attorneys for Tangipahoa Parish School Board

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2009, I electronically filed the foregoing document with the Clerk of Court by using CM/ECF system which will send a notice of electronic filing to all counsel of record.

s/ Charles L. Patin, Jr.
Charles L. Patin, Jr.