

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 EXPEDITED CONSIDERATION OF DEFENDANT'S
MOTION FOR COURT APPROVAL OF CERTAIN REPAIRS TO SCHOOLS**

NOW INTO COURT, through undersigned counsel, comes Defendant Tangipahoa Parish School Board who respectfully moves the court for expedited consideration of its Motion for Court Approval of Certain Repairs to Schools for the following reasons:

1.

The repairs consisting of the replacement of metal doors and frames and flooring at Westside Middle School in Amite, Louisiana, are needed for security reasons. The existing doors are not original to the building and have been replaced several times. Certain of these doors have problems locking; thus, presenting a security problem at the school. This project will replace the doors with hollow metal doors, replace rotten framing and glazing, and add hardware to match the original construction specifications.

2.

The cooling tower at Hammond Eastside Elementary School is in need of replacement. The current cooling tower is over 20 years old. The enter fans are rusted out. The cooling tower is an integral component of the HVAC system for the school. The school's HVAC system is essential to occupancy of classrooms and other interior areas of the school.

3.

The existing field track surface at Ponchatoula High School is approximately five to six years old and has deteriorated in several areas. In certain areas it is worn though to the underlying concrete subsurface and presents a hazard for students competing in track activities. Defendant desires to have the track resurfaced as soon as possible in order that it may be used for the upcoming track and field season.

WHEREFORE, Defendant Tangipahoa Parish School Board prays that its motion for expedited consideration of motion for court approval of certain repairs to schools be granted.

s/ Charles L. Patin, Jr.

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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.