

## Nelson Dan Taylor

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**From:** Nelson Dan Taylor [jklegal@bellsouth.net]  
**Sent:** Friday, August 07, 2009 7:17 AM  
**To:** 'Arlene Guerin'  
**Subject:** FW: Marilyn Dunn  
**Attachments:** AAA Fee and Arbitration Rules.pdf; letter to Murphy.pdf; ltr guerin 7-28-09.pdf

Arlene,

I saw this in my draft box and I am not sure it went out to you, so I am sending again

NDT

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**From:** Nelson Dan Taylor [mailto:jklegal@bellsouth.net]  
**Sent:** Tuesday, July 28, 2009 5:33 PM  
**To:** 'Arlene Guerin'  
**Cc:** 'nitsuaii@aol.com'  
**Subject:** RE: Marilyn Dunn

Yes, the October 2008 letter to Attorney Karen Murphy invoked Marilyn Dunn's rights under the existing court order. The attached letter to you dated 7-28-09 officially asks you to intervene and enforce the non-binding arbitration provisions authorized by the court order. Resort to this process may help us to sort out the facts and avoid full blown legal proceedings.

I am attaching the AAA rules and fee schedules. I ask that you contact Ms. Murphy and advise her as to the requirements of the court order.

Nelson Dan Taylor, Sr.  
J. K. Haynes Legal Defense Fund  
928 St. Charles Street  
Thibodaux, LA 70301  
Phone: 504-214-7109  
Office: 225-356-5252  
Fax: 225-612-6612  
email: [jklegal@bellsouth.net](mailto:jklegal@bellsouth.net)

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**From:** Arlene Guerin [mailto:Arlene.Guerin@tangischools.org]  
**Sent:** Thursday, July 23, 2009 3:38 PM

**To:** Nelson Dan Taylor  
**Subject:** FW: Marilyn Dunn

Is this what you were looking for?

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**From:** Nelson Dan Taylor [mailto:jklegal@bellsouth.net]  
**Sent:** Tuesday, October 07, 2008 12:19 PM  
**To:** kmurphy@hamsil.com; 'Charlie Patin'; 'Chris Moody'; Arlene Guerin; 'Arlene Guerin'  
**Cc:** 'James Austin Gray, II'; gideon.carter@Lawyer4u.com; jklegal@bellsouth.net  
**Subject:** Marilyn Dunn

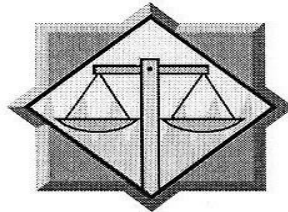
Karen Murphy,

Per our discussion this morning, attached is my letter concerning Marilyn Dunn in which I request a continuance of the hearing until we can resolve the arbitration issue. This is the second draft of this email. Due to technical difficulties, I am not sure of what happened to the first one. Please disregard if you receive it.

Nelson Dan Taylor, Sr.  
LA Bar No. 12684  
J. K. Haynes Legal Defense Fund  
928 Saint Charles St  
Thibodaux, LA 70301  
Phone: 225/356-5252  
Fax: 225/356-8355  
Cell: 985/414-4505 or 504/214-7109  
e-mail: [jklegal@bellsouth.net](mailto:jklegal@bellsouth.net)

***J. K. Haynes Legal Defense Fund***

1822 North Acadian Thruway West  
Baton Rouge, Louisiana 70802



*Striving for Justice*

**NELSON DAN TAYLOR**  
Director Counsel

Phone: 225/356-5252  
Fax: 225/356-8355  
Cell: 504/214-7109

VIA E-MAIL

October 7, 2008

Karen Murphy, Esq.  
HAMMONDS & SILLS  
1111 S. Foster Drive, Ste. C  
Baton Rouge, LA 70806  
E-mail: kmurphy@hamsil.com

Re: Marilyn Dunn

I am not located where I can access my files or the court's ECF system to send you the order containing the arbitration provisions. Nevertheless, the Tangipahoa Parish School Board has a Compliance Officer, Attorney Arlene Guerin, who is responsible for compliance with orders of the court in Moore v. Tangipahoa Parish School Board, No. 15556 on the docket of the United States District Court for the Eastern District of Louisiana. In addition, the school board has three attorneys of record in the case, all of whom should have been able to provide you with a copy of the appropriate court order. The request for arbitration on behalf of Ms. Dunn was submitted to Ms. Guerin in accordance with procedures used by the parties to resolve issues in the Moore case. She has not indicated to me that there was anything amiss in the request. I fully expect Ms. Guerin to proceed with setting up the arbitration with the American Arbitration Association.

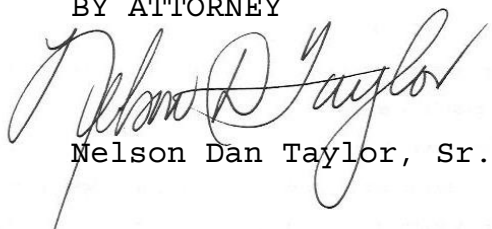
For your information, Ms. Dunn's right to review of personnel actions by an arbitrator from the American Arbitration Association are part of a settlement agreement between the parties in the Moore case signed May 15, 1975 [R. Doc. 191], which agreement became a verbatim Order of the court signed June 17, 1975 [R. Doc 193]. I am baffled by your comment that the

school board's desegregation counsel cannot find the order, since the June 1975 Order is one of the most current substantive directives of the court prior to the present litigation in the case.

As I suggested to you by phone this morning, Ms. Dunn would like an unbiased opinion on the personnel matter at issue. As we discussed, by copy of this letter, I am requesting a continuance of the hearing scheduled for today, pending notification from the Compliance Officer regarding Ms. Dunn's request for arbitration.

Sincerely,

BY ATTORNEY

A handwritten signature in cursive script, appearing to read "Nelson Dan Taylor, Sr.", is written over a faint, rectangular stamp. The signature is written in dark ink and is the primary focus of this block.

Nelson Dan Taylor, Sr.



J. K. Haynes Legal Defense Fund  
928 St. Charles Street  
Thibodaux, LA 70301  
Phone: (225) 356-5252  
Fax: (225) 612-6612  
e-mail: [jklegal@bellsouth.net](mailto:jklegal@bellsouth.net)

Nelson Dan Taylor, Sr.  
Director Counsel  
Cell: (504) 214-7109

VIA E-MAIL ONLY  
July 28, 2009

Arlene Knighten Guerin, Esq.  
Court Compliance Officer  
Tangipahoa Parish School Board

Re: Marilyn Dunn v. Tangipahoa Parish School Board

Dear Ms. Guerin:

Whether school board attorneys can find the pertinent order or not, Marilyn Dunn is entitled to a non-binding arbitration before an Arbitrator of the American Arbitration Association. I cited the court orders to Attorney Karen Murphy, Rec. Doc. 191 and Rec. Doc. 193, which state specifically, Part II (Faculty, Staff and Students):

L. Teachers and administrators within the parish shall be given adequate notice of any unfavorable personnel actions taken by the School System...and the reasons for the action and shall have the right to request review from . . .

.....  
4) An arbitrator from the American Arbitration Association selected cooperatively by the School Board and Tangipahoa Parish Education Association.

The Tangipahoa Parish Education Association is now the J. K. Haynes Foundation. I am counsel for the J.K. Haynes Foundation's parent organization.

Compliance with the orders of the court in the Moore case is not optional and I request that you take such steps as necessary to enforce the applicable order.

Please provide a copy of any investigative reports or documents you may have concerning Ms. Dunn in your capacity as the Court Compliance Officer.

Thank you for your cooperation.

BY ATTORNEY

Nelson Dan Taylor, Sr.