

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

**MEMORANDUM IN SUPPORT OF
MOTION FOR COURT APPROVAL FOR ELECTION FOR
CONTINUATION AND EXPANSION OF EXISTING HAMMOND MAGNET
PROGRAMS**

MAY IT PLEASE THE COURT:

Defendant Tangipahoa Parish School Board presently operates accelerated magnet programs pursuant to a prior court order at Hammond Eastside Primary and Upper and Hammond Westside Primary and Upper elementary schools. Special funding was necessary for the establishment of the magnet programs and such funding was acquired through passage of a tax proposition within the city of Hammond. The tax is due to expire prior to commencement of next school year and is in need of renewal to continue the programs.

Because of the success of the magnet programs, the School Board seeks to expand the accelerated magnet program into the seventh and eighth grades at Hammond Junior High School. In order to do so, additional tax dollars will be needed through the election for which court approval is sought herein. Expansion into the seventh grade for School Year 2010 will require advertising the expanded grade, the filing of applications on behalf of students meeting admissions requirements who are interested in the magnet, staffing, and procurement of necessary materials of instruction.

The March 27, 2010, election date, with deadline for submission of the tax proposition to the secretary of state by January 15, 2010, is the only feasible date on which to hold the election to assure continuation of funding and adequate time for expansion of the program into Hammond Junior High School. Accordingly, Defendant Tangipahoa Parish School Board prays that the order requested herein be granted by the court and that hearing on the motion be expedited in order that a ruling may be had prior to January 15, 2010.

By Attorneys,

s/ Charles L. Patin, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 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.