

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 FOR ELECTION FOR
CONTINUATION AND EXPANSION OF EXISTING HAMMOND MAGNET
PROGRAMS**

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 for Election for Continuation and Expansion of Existing Hammond Magnet Programs for the following reasons:

1.

In order to assure an orderly continuation of the existing pre-kindergarten through sixth grade Hammond Accelerated Magnet Program at Hammond Eastside Primary and Upper and at Hammond Westside Primary and Upper and to expand the program into grades seven and eight commencing next school year at Hammond Junior High School, a tax election for necessary funding must be held prior to the end of the current school year.

2.

Under state law, the last proposition election date prior to the close of the current school year is March 27, 2010. In order for the School Board hold an election on March 27, 2010, the tax proposition must be filed with the secretary of state on January 15, 2010.

3.

The filing of the Motion for Court Approval for Election for Continuation and Expansion of Existing Hammond Magnet Programs was delayed until this time in hopes that an order might be entered herein by the court approving the School Board's proposed new school desegregation plan. Under that proposed plan, the Hammond Accelerated Magnet Program, a "school within a school" program, would be replaced by an International Baccalaureate Primary Years program at Hammond Eastside Elementary School, a Montessori program at Hammond Westside Elementary School, and an International Baccalaureate Middle Years Program at Hammond Junior High School. These magnet programs would serve all students enrolled in the schools and the "school within a school" concept would be abandoned.

The School Board had hoped that a tax election for the three propositions in the proposed new school desegregation plan could be held prior to an election for continuation and expansion of the Hammond Accelerated Magnet Program. Passage of the three tax propositions for implementation of the proposed new school desegregation plan would have mooted the need for an election for continuation and expansion of the Hammond Accelerated Magnet Program. Moreover, it was the opinion of the School Board that holding an election on the tax propositions needed for implementation of the proposed new school desegregation plan prior to, or if unavoidably necessary at the same time as the election for continuation and expansion of the Hammond Accelerated Magnet Program, would have served to enhance the likelihood of passage of the taxes needed for implementation of the proposed new school desegregation plan.

WHEREFORE, Defendant Tangipahoa Parish School Board prays that its Motion for Court Approval for Election for Continuation and Expansion of Existing Hammond Magnet Programs be granted.

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.