

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 RENEWAL TAX ELECTION LIMITED TO
ONE YEAR LEVY OF THE TAX FOR CONTINUATION AND EXPANSION OF
HAMMOND ACCELERATED MAGNET PROGRAM**

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 Renewal Tax Election Limited to One Year Levy of the Tax for Continuation and Expansion of Hammond Accelerated Magnet Program for the following reasons:

1.

Defendant presently has State Bond Commission approval for a tax renewal election for a three year period to fund continuation and expansion of the Hammond Accelerated Magnet Program for a three year period. Such approval, with subsequent voter approval of the renewal proposition would authorize a three year levy of the tax.

2.

Conduct of the election requires the approval of this court. Court approval was denied by Order in Record Document No. 866, entered on January 19, 2010.

3.

Defendant's instant motion seeks court approval for a one year levy of the tax should voter approval be obtained.

4.

The last day for withdrawal of the renewal proposition is February 12. Accordingly, if the renewal proposition is to appear upon the ballot, court approval must be obtained prior to February 12. In the absence of court approval on or before February 12, the proposition will be withdrawn by defendant.

WHEREFORE, Defendant Tangipahoa Parish School Board prays that the defendant's instant Motion for Expedited Consideration of Motion for Court Approval of Renewal Tax Election Limited to One Year Levy of the Tax for Continuation and Expansion of Hammond Accelerated Magnet Program be granted.

By Attorneys,

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/ Ashley E. Sandage

Ashley E. Sandage (La. Bar # 24364)

CASHE, 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 February 10, 2010, I electronically filed the foregoing document with the Clerk of Court by means of 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.