

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
JOINT MOTION FOR COURT APPROVAL FOR CHANGE IN MISSION OF SCHOOL**

Defendant Tangipahoa Parish School Board files the instant unopposed motion in an abundance of caution.

Paragraph 1(H) of the Order in Record Document No. 876 provides as follows:

Court approval shall be obtained for any change in the mission of a school not otherwise expressly provided for in this Order.

The school board proposes to move the location of Northwood High School from its present temporary building site to a permanent site at what is now referred to as the Crystal Street School. The current boot camp program at Northwood will be continued as well as the Options III/Pre GED program currently being offered at the Crystal Street site. Additional programs – STAAAY, an alternative to expulsion for special need students with severe emotional disorders in grades six through twelve, and a K-5 Alternative, a temporary placement in lieu of expulsion for elementary students for violations of state laws for crimes such as possession of weapons and/or drugs on school premises and incidents of severe bodily harm to school staff, fellow students or other persons – will be offered. Nevertheless, the consolidated and expanded programs will continue to address the needs of at-risk students by offering them a means to remain in school as opposed to being expelled and sent home or into the streets.

WHEREFORE, Defendant Tangipahoa Parish School Board prays that court approval be granted for relocation of the Northwood High School to the Crystal Street site and for the expanded programs proposed to be offered at the Crystal Street site.

By Attorneys,

s/ Charles L. Patin, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2010, 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.

Charles L. Patin, Jr.
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