

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

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

COMES NOW Defendant Tangipahoa Parish School Board, through its undersigned counsel, who, in accordance with Paragraph 1(H) of the Order in Record Document No. 876, moves the court for approval for a new location and expanded mission of the program presently housed at Northwood High School for the following reasons:

1.

The present Northwood High School facility is composed of temporary structures and provides limited services in the form of a "boot camp" for expelled students.

2.

The school board proposes to move Northwood High School to a permanent structure located on what is known as the Crystal Street campus and for continuation of the existing boot camp and for expanded program offerings for at-risk students.

3.

Additional alternative services will consist of (a) STAAAY – an alternative to expulsion for special need students with severe emotional disorders in grades six through twelve, and (b) a K-5 Alternative – a program of temporary placement in lieu of expulsion for elementary students

for violation of state laws for such crimes as possession of weapons and/or drugs on school premises and incidents of severe bodily harm to school staff, fellow students or other persons.

4.

The boot camp will continue to serve students in grades six through twelve who have been expelled. The Options III/Pre GED program, already housed at the Crystal Street site, will continue serving students who elect to pursue GED and/or Vocational Programs as a means of exiting the school system.

5.

Accordingly, the proposal for the Crystal Street site will continue to address the needs of at-risk students with expanded program offerings.

6.

Mover shows that undersigned counsel received a telephone call yesterday afternoon from James A. Gray, II, co-counsel for plaintiffs, advising that plaintiffs do not interpose objection to the relief sought herein.

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

By Attorneys,

s/ Charles L. Patin, Jr.  
Charles L. Patin, Jr. (La. Bar # 10338)  
KEAN, MILLER, HAWTHORNE, D'ARMOND,  
McCOWAN & JARMAN, L.L.C.  
One American Place, 18<sup>th</sup> Floor  
Post Office Box 3513 (70821)  
Baton Rouge, LA 70825  
Telephone: 225-387-0999  
E-mail: charlie.patin@keanmiller.com

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  
E-mail: aes@ccsattorneys.com

**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.  
Charles L. Patin, Jr.