

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

JOYCE MARIE MOORE, ET AL.,

CIVIL ACTION

NO. 65-15556

VERSUS

JUDGE LEMELLE

TANGIPAHOA PARISH SCHOOL BOARD, ET AL.

MAGISTRATE SHUSHAN

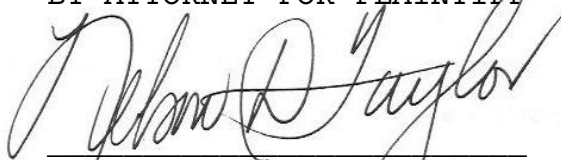
MEMORANDUM IN SUPPORT OF MOTION FOR EXPEDITED HEARING

The plaintiffs have submitted detailed "Motion for Further Relief" requesting, inter alia, the immediate appointment of Mildred Johnson as the Principal of Hammond High School [R. Doc. 895], together with a memorandum [R. Doc. 895-11] which set forth the facts and their reasons for requesting the court to hold an expedited hearing.

The defendants' failure to appoint Mildred Johnson, a highly qualified African-American, to the position of Principal at Hammond High School is a blatant violation of the orders of this court and a *deja vu* repetition of the same type of misconduct by defendants when they attempted to avoid appointing Alden Foster as the head football coach at Amite High School. Once again a high profile position is open in a position never before held by a Black person. Once again the defendants invent a frivolous excuse for not appointing a clearly better qualified Black applicant with superior credentials.

There are no complex facts here. The defendants are clearly making an effort once again to present the court with action intended to be fait accompli. The plaintiffs urge that this time court's reaction and review out to be swift, with substantial punitive remedies imposed. As this court has done previously, the defendants who have supported the violation of the court's order should be held in contempt, fined individually, and ordered to do what they clearly should have done.

BY ATTORNEY FOR PLAINTIFF



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CERTIFICATE

I hereby certify that, on this day, July 23, 2010, the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system which gives notice of filing to all counsel of record.

