

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 TO REPLACE COOLING TOWER AT  
HAMMOND JUNIOR HIGH SCHOOL**

NOW INTO COURT, through undersigned counsel, comes Defendant Tangipahoa Parish School Board who, pursuant to Paragraph 31(B) of the new school desegregation plan in Order Record Document No. 876, moves the court for approval to replace the cooling tower at Hammond Junior High School for the following reasons:

1.

The current cooling tower at Hammond Junior High School is approximately 26 years old and is in need of replacement due to its deteriorating condition.

2.

The projected cost of replacement for the cooling tower at Hammond Junior High School is \$275,000. The budget sheet from Morgan's Mechanical Services, L.L.C. containing the estimated costs for replacement of the cooling tower is attached as Exhibit "A".

3.

The cooling tower is an integral component of the HVAC system for the school and is essential for internal temperature control and air flow.

4.

Undersigned counsel was advised via e-mail transmission on August 5, 2010 from plaintiffs' lead counsel, Mr. Nelson Dan Taylor, that plaintiffs interpose no objection to the relief sought herein.

WHEREFORE, Defendant Tangipahoa Parish School Board prays for entry of an order authorizing replacement of the cooling tower at Hammond Junior High School.

By Attorneys,

s/ Charles L. Patin, Jr.

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s/ Ashley E. Sandage

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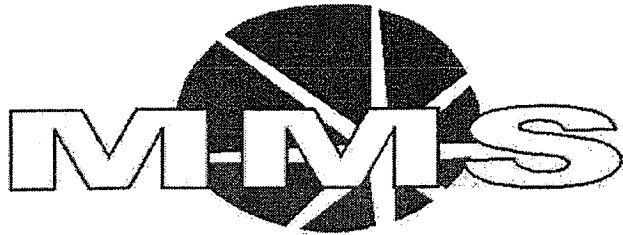
*Attorneys for Tangipahoa Parish School Board*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 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.

s/ Charles L. Patin, Jr.

Charles L. Patin, Jr.



# Budget

**Morgan's Mechanical Service, L.L.C.**  
 P.O. Box 516  
 Amite LA 70422  
 1-800-273-3758

<b>Customer Name:</b> Tangipahoa Parish School System P. O. Box 457 Amite, LA 70422	<b>Job Location / Description:</b> Hammond Junior High Cooling Tower Replacement Project Budget
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**Proposal No.: AM-62410-1**  
**Attn.: Mr. Pascal Lamarca**

**DATE: June 24, 2010**

**We Hereby Submit Specifications and Estimates For:**

material and labor to replace two (2) cooling towers, install a new non-chemical water treatment system and upgrade the electrical service and controls, according to the following scope of work.

**Scope Of Work:**

- 1 - Disconnect, remove and dispose of the existing cooling towers.
- 2 - Install two (2) new cooling towers including tower supports.
- 3 - Reconnect all loop system piping less bypass valves.
- 4 - Install a new non-chemical water treatment system including piping, power and controls.
- 5 - Install new outdoor rated fan VFD's and spray pump starters.
- 6 - Install new power service disconnects, conduits and wiring.
- 7 - Price includes all energy management disconnecting and reconfiguration and reconnection.
- 8 - Price includes all crane, crane matting, fence removal and restoration.
- 9 - One (1) year parts and labor warranty.

**Note:**

This is a project budget figure for budgeting purposes only.

We propose hereby to furnish material and labor - complete in accordance with the above scope of work for the following sum: **\$275,000.00**

<b>Payment To Be Made As Follows:</b>	<b>NET 30 DAYS</b>
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*Morgan's Mechanical Service, LLC*

*Authorized Signature:*

Alan Morgan, Manager \_\_\_\_\_

*Customer Signature:* \_\_\_\_\_

*Acceptance Date:* \_\_\_\_/\_\_\_\_/\_\_\_\_



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**ORDER**

Considering the foregoing unopposed motion for court approval to replace cooling tower at Hammond Junior High School;

IT IS ORDERED that the Tangipahoa Parish School Board is hereby authorized to take needed action for replacement of the cooling tower at Hammond Junior High School.

New Orleans, Louisiana, this \_\_\_ day of August, 2010.

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IVAN L. R. LEMELLE, JUDGE  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

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**MEMORANDUM IN SUPPORT OF UNOPPOSED MOTION FOR COURT  
APPROVAL TO REPLACE COOLING TOWER AT  
HAMMOND JUNIOR HIGH SCHOOL**

MAY IT PLEASE THE COURT:

Pursuant to Paragraph 31(B) of the new school desegregation order (R. Doc. No. 876) court approval must be sought and obtained for repairs and replacements where the estimated cost exceeds \$125,000. In compliance therewith, the present motion is filed with the court.

The cooling tower at Hammond Junior High School is approximately 26 years old and it is in need of replacement due to its deteriorating condition. The projected cost of for replacement of the cooling tower is \$275,000. The cooling tower is an integral component of the school's HVAC system and is essential for internal temperature control and air flow.

Plaintiffs have advised undersigned counsel that they do not oppose the relief sought in the present motion.

WHEREFORE, Defendant Tangipahoa Parish School Board prays for entry of an order authorizing replacement of the cooling tower at Hammond Junior High School.

By Attorneys,

s/ Charles L. Patin, Jr.

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