

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

JEREMIAH TAYLOR, ET AL.

CIVIL ACTION NO. 66-12171

VERSUS

OUACHITA PARISH SCHOOL BOARD

JUDGE ROBERT G. JAMES

**MOTION FOR DECLARATION OF
UNITARY STATUS AND FOR DISMISSAL**

NOW INTO COURT, through undersigned counsel, comes the Defendant, OUACHITA PARISH SCHOOL BOARD, who respectfully moves the Court for a final declaration of unitary status and to fully and finally dismiss this action and who, in support thereof, would show, as follows:

1. This is a desegregation action originally brought in 1966 by the parents of black students attending school in Ouachita Parish, Louisiana.
2. On January 30, 1970, the Court issued a desegregation decree under which the OUACHITA PARISH SCHOOL BOARD (“The School Board”) has operated, with modification and amendment, for more than forty years. Also, a Consent Decree in the form of a Settlement and Compromise Agreement was approved by the Court on August 5, 1998.
3. On September 5, 2012, the School Board filed an Amended Motion for Declaration of Partial Unitary Status as to Faculty Assignments, Staff Assignments, Extra-Curricular Activities and Physical Facilities. No opposition was filed to that Motion.

4. On September 27, 2012, this Court granted the School Board's Motion finding that the School Board had achieved partial unitary status in those areas enumerated above. The Court's ruling noted that the School Board remained under the supervision of the Court in the areas of transportation and student assignment.

5. The School Board respectfully submits that acting in accordance with all prior orders and decrees, it has eliminated the vestiges of past discrimination in all areas of operation such that further supervision is no longer warranted.

6. The Motion is supported by the following evidence:

- | | |
|------------|---|
| Exhibit 1 | Equal Education Opportunity Policy |
| Exhibit 2 | Declaration of Dr. Robert Webber |
| Exhibit 3 | Unitary Review and Analysis Report by Michael Hefner dated May 23, 2013 |
| Exhibit 4 | Student Assignment Policies |
| Exhibit 5 | Student Transportation Management Policy |
| Exhibit 6 | Official Minutes of March 21, 2013 Meeting |
| Exhibit 7 | Notice of Public Hearing of April 2, 2013 |
| Exhibit 8 | Statements of Publication |
| Exhibit 9 | Notice of Public Meeting, Agenda and Minutes of April 11, 2013 Meeting |
| Exhibit 10 | Notice of Public Meeting, Agenda and Minutes of May 23, 2013 Meeting |

7. The Motion is supported by the accompanying Memorandum in Support of Motion for Declaration of Unitary Status and for Dismissal, which is incorporated as if fully set forth herein.

WHEREFORE, PREMISES CONSIDERED, Defendant, OUACHITA PARISH SCHOOL BOARD, requests that the Court enter an order declaring that unitary status has been achieved in all areas of operation, and, therefore, dismissing the action, lifting the permanent injunction, and terminating its supervision over the Ouachita Parish School District.

RESPECTFULLY SUBMITTED, this the 9th day of July, 2013.

HAMMONDS, SILLS, ADKINS & GUICE, LLP
1881 Hudson Circle
Monroe, Louisiana 71201
Telephone (318) 324-0101
Facsimile (318) 322-5375

s/ Elmer G. Noah, II

ELMER G. NOAH, II
La. Bar Roll No. 10009

Attorneys for the
OUACHITA PARISH SCHOOL BOARD

CERTIFICATE OF SERVICE

I hereby certify that this is a true and correct copy of the above and foregoing **MOTION FOR DECLARATION OF UNITARY STATUS AND FOR DISMISSAL** which has been filed by electronic transmission to the Clerk of Court by use of the CM/ECF system which will send a notice of electronic filing to counsel registered with the Court for receipt of pleadings by e-mail and via U.S. mail, postage prepaid, to those parties of record who have not registered with the CM/ECF system.

MONROE, LOUISIANA this 9th day of July, 2013.

s/ Elmer G. Noah, II

ELMER G. NOAH, II