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May 6, 2011

The Honorable Brian S. Miller
U. S. Courthouse
500 West Capitol Ave., Room D28
Little Rock, AR 72201

Re: *Little Rock School District, et al v. Pulaski County School District et al*
USDC Eastern District of Arkansas Western Division No. 4:82cv0866 BSM

Dear Judge Miller:

Today the Pulaski County Special School District is filing its “Motion for Court Approval of Construction, Reconstruction, School Consolidation and School Replacement” for consideration by this Court.

It is our belief that so long as the Court has jurisdiction over Plan 2000, that we should seek the Court’s review of these construction plans which are fully explained in the Motion and accompanying Memorandum Brief being filed today.

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Thank you very much.

Cordially yours,

MITCHELL, WILLIAMS, SELIG,
GATES & WOODYARD, P.L.L.C.

By

/s/ M. Samuel Jones, III

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**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

LITTLE ROCK SCHOOL DISTRICT

PLAINTIFF

V.

NO. 4:82CV00866BSM/HDY

**PULASKI COUNTY SPECIAL SCHOOL
DISTRICT NO. 1, ET AL.**

DEFENDANTS

MRS. LORENE JOSHUA, ET AL.

INTERVENORS

KATHERINE KNIGHT, ET AL.

INTERVENORS

**PULASKI COUNTY SPECIAL SCHOOL DISTRICT'S
MOTION FOR COURT APPROVAL OF CONSTRUCTION, RECONSTRUCTION,
SCHOOL CONSOLIDATION AND SCHOOL REPLACEMENT**

The PCSSD for its Motion states:

1. The Pulaski County Special School District (PCSSD) has conducted a series of community forums calculated to obtain comments and feedback concerning the broad outline of its plan to implement Vision 2020, an ambitious program for school construction, reconstruction and renovation. The particulars of Vision 2020 as they have been refined are set out in the accompanying Brief.
2. Plan 2000 requires that the District notify the Joshua Intervenors of plans for new school construction or for plans that add capacity to existing schools as well as the projected impact on the racial makeup of the students in the schools affected by the construction.
3. This notice was dispatched to Joshua on March 7, 2011. A copy of the notice letter is attached to this Motion as Exhibit A. Plan 2000 provides that Joshua shall have 14 days in which to provide input concerning the proposal. The PCSSD has received no written response to the March 7 letter.

4. Plan 2000 prohibits the closing of schools located in predominantly African-American areas. Vision 2020 honors this prohibition.

5. The PCSSD is simultaneously pursuing approval for these same construction projects as well as the financing for them from the Arkansas State Board of Education. The projects cannot proceed to construction unless or until this Court and the State Board of Education approve them.

6. As more particularly explained in the accompanying Brief, the schools impacted are Harris Elementary School, College Station Elementary School, Scott Elementary, Jacksonville Elementary, Arnold Drive and Tolleson Elementary, Jacksonville Middle School and Robinson Middle School.

7. It is currently estimated that if approved, total construction costs will approximate \$104,000,000.

8. The PCSSD Office of Equity and Pupil Personnel has calculated the best method to redistribute the students on a temporary basis from Jacksonville Elementary School. A numerical depiction of these distributions is attached to this motion as Exhibit B. As the Court and the parties can see, for the most part the impacts upon racial balance are de-minimis but predominantly positive.

9. The PCSSD desires to commence to sell the bonds this summer and to commence construction as soon thereafter as possible.

10. Should the Court or other parties need or desire additional information, the PCSSD stands ready, willing and able to supply it.

11. This Motion is accompanied by a Memorandum Brief which supplies the particulars of Plan 2000 and the current details regarding the particulars of Vision 2020.

WHEREFORE, the PCSSD prays for an Order of this Court approving the construction projects described in the accompanying Memorandum Brief as Vision 2020 and for all proper relief.

Respectfully submitted,

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District*

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

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/s/ M. Samuel Jones, III

I hereby certify that on May 6, 2011, I mailed the document by United States Postal

Service to the following non CM/ECF participants.

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