

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

LITTLE ROCK SCHOOL DISTRICT

PLAINTIFF

V.

NO. 4:82CV00866DPM

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

DEFENDANTS

MRS. LORENE JOSHUA, ET AL.

INTERVENORS

KATHERINE KNIGHT, ET AL.

INTERVENORS

PCSSD'S MOTION FOR DISCOVERY ORDER

The Pulaski County Special School District (PCSSD) for its motion states:

1. On May 21, 2012 this court entered its Order (Document 4755) addressing the request for fees of the Joshua Intervenors at the district court level.
2. Among other matters, the Court directed that Joshua submit a fee petition, if it chose to submit one, by June 30, 2012, as well as a Rule 6(b)(1)(B) motion.
3. The petition, if in fact submitted, may span a period of several years, regardless of the court's disposition of the Rule 6 (b)(1)(B) motion.
4. The petition, if submitted, will have to be responded to, at least in part, by The PCSSD at some point.
5. In all likelihood, the contents of the petition will likely generate a need by the PCSSD to conduct discovery. While the PCSSD could guess at some of the contents of any such petition now, it believes that the more efficient and prudent course would be for the district to

examine the petition, if it is in fact filed, and then with the benefit of that review, focus and craft its discovery to deal exclusively with the items set out in the petition.

6. The PCSSD seeks no enlargement of time to respond to the Rule 6(b)(1)(B) motion.

7. However, the PCSSD would request a period of sixty (60) days after the submission of any such fee petition to conduct discovery and respond to the petition with the benefit of said discovery.

WHEREFORE, the Pulaski County Special School District prays for an order of this court granting it until and including sixty (60) days after the filing of any fee petition by Joshua during which time it be permitted to conduct discovery and craft a response to the fee petition if filed.

Respectfully submitted,

MITCHELL, WILLIAMS, SELIG,
GATES & WOODYARD, P.L.L.C.
425 West Capitol Avenue, Suite 1800
Little Rock, Arkansas 72201
Telephone: (501) 688-8800
Facsimile: (501) 688-8807
E-mail: sjones@mwlaw.com

/s/ M. Samuel Jones, III
M. Samuel Jones III (76060)

Attorneys for Pulaski County Special School
District

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2012, 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:

- **Mark Terry Burnette**
mburnette@mbbwi.com
- **John Clayburn Fendley , Jr**
clayfendley@comcast.net
- **Christopher J. Heller**
heller@fec.net
- **Stephen W. Jones**
sjones@jlj.com
- **Office of Desegregation Monitor**
paramer@odnemail.com
- **Scott P. Richardson**
scott.richardson@arkansasag.gov,agcivil@arkansasag.gov
- **John W. Walker**
johnwalkeratty@aol.com,lorap72297@aol.com,jspringer@gabrielmail.com
- **Allen P. Roberts**
allen@aprobertslaw.com
- **Jeremy Christopher Lasiter**
jeremy.lasiter@arkansas.gov

/s/ M. Samuel Jones, III