

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

**LITTLE ROCK SCHOOL DISTRICT,  
*et al.***

**PLAINTIFFS**

**v. No. 4:82-cv-866-DPM**

**NORTH LITTLE ROCK SCHOOL DISTRICT,  
*et al.***

**DEFENDANTS**

**LORENE JOSHUA, *et al.***

**INTERVENORS**

**MOTION FOR UNITARY STATUS**

Jacksonville/North Pulaski School District (JNPSD), through its attorneys Scott P. Richardson, states as follows for its *Motion for Unitary Status*:

1. From its creation in November of 2014, through its final detachment on June 30, 2016, to today, JNPSD has substantially complied in good faith with the requirements of Plan 2000.

2. JNPSD remains under active court supervision in the areas of academics, student discipline, staffing incentives, and monitoring.

3. As explained more fully in the Brief of Law filed herewith, JNPSD has substantially complied with Plan 2000's requirements in these areas.

4. Pursuant to Rule 60, the Court may release JNPSD from active court supervision based on a change of circumstances including compliance with the District's desegregation plan; because applying Plan 2000 prospectively is no longer equitable; and for other reasons justifying relief. Fed. R. Civ. P. 60(b)(5) & (6); *Rufo v. Inmates of the Suffolk County Jail*, 502 U.S. 367 (1992); *Freeman v. Pitts*, 503 U.S. 467, 112 S.Ct. 1430 (1992); *Horne v. Flores*, 557 U.S. 433, 129 S.Ct. 2579 (2009).

5. JNPSD requests that it be declared unitary, released from court supervision, and released from the dictates of Plan 2000.

WHEREFORE, JNPSD respectfully requests a ruling from the Court that it is unitary in the areas of student discipline, academics, staffing incentives, and monitoring; alternatively, if the Court finds that should not be so released, JNPSD requests that Plan 2000 be modified to reflect the changed circumstances and provide a more accurate path to release from court supervision; and for all other relief to which JNPSD is entitled.

Respectfully Submitted,

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