

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

AUG 14 2007

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

JAMES W. McCORMACK, CLERK  
*[Signature]*

UNITED STATES OF AMERICA

PLAINTIFF

vs.

No. 2:70CV00010 JMM

COTTON PLANT SCHOOL DISTRICT NO. 1, *et al.*

DEFENDANTS

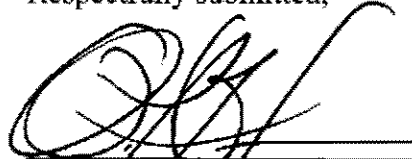
**DEFENDANT ENGLAND SCHOOL DISTRICT'S RESPONSE  
TO PLAINTIFF'S MOTION FOR FURTHER RELIEF**

Comes now Separate Defendant England School District of Lonoke County, Arkansas ("District"), and, for its Response to the Motion for Further Relief filed by the Plaintiff, states as follows:

1. The Plaintiff asserts that the Defendant uses race-based methods to select homecoming royalty for the District's homecoming football games.
2. The District has changed its policy so as to eliminate such race-based selections.
3. A copy of the current homecoming royalty policy is attached hereto as Exhibit 1, along with the minutes showing the adoption of such policy by the England School Board, Exhibit 2.

WHEREFORE, Separate Defendant England School District prays that the Motion for Further Relief of the Plaintiff be denied; that the England School District No. 1 of Lonoke County, Arkansas, be declared unitary; that court supervision of the District be ended; and for all other, proper relief.

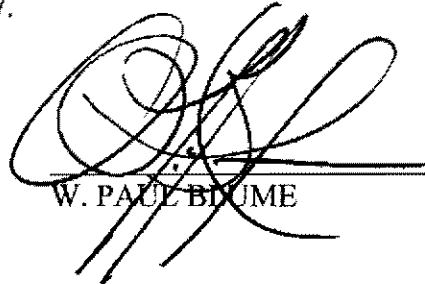
Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'W. Paul Blume', is written over a horizontal line.

W. PAUL BLUME No. 79018  
808 Martin Luther King Drive  
Little Rock, Arkansas 72202  
(501) 375-7922

### **CERTIFICATE OF SERVICE**

I hereby certify that I have filed the foregoing Response with the Clerk of the Court of the Eastern District of Arkansas, which will send notification of such filing to counsel of record, Ms. Kym Davis Rogers, this 14<sup>th</sup> day of August, 2007.

A large, stylized handwritten signature in black ink, appearing to read 'W. Paul Blume', is written over a horizontal line.

W. PAUL BLUME

## **ENGLAND HOMECOMING POLICY**

The Homecoming Royalty is chosen by the student body. The student body will select four (4) senior maids. The student body in grades 10 through 12 then will vote on the homecoming queen. The senior maid with the most votes will be crowned homecoming queen during the homecoming ceremonies before the game. It will be a surprise.

The 11<sup>th</sup> grade students will elect two eleventh grade maids.

The 10<sup>th</sup> grade students will elect two tenth grade maids.

Junior High maids will not be involved in the Sr. High Homecoming ceremonies. The Jr. High student body will choose a Homecoming Princess from the 9th grade. Two maids from the seventh grade will be chosen by the Jr. High student body. In addition, the Jr. High student body will also select two 8<sup>th</sup> grade maids. Appropriate dress is required.



ENGLAND SCHOOL DISTRICT  
501 PINE BLUFF HIGHWAY  
ENGLAND, AR 72046  
501-842-2996/FAX: 501-842-3698

PAULA HENDERSON, SUPERINTENDENT  
*North Central Accredited*

ENGLAND SCHOOL BOARD MINUTES  
Regular Session  
Monday, July 17, 2006  
6:00 p.m.

A parent/guardian of a ninth grade student addressed the Board regarding special services for her grandson. After some discussion Superintendent Henderson assured the parent that she would look into the matter and get back to her to try and resolve her concerns.

Board President Jerry Rice called the regular meeting to order at 6:10 p.m. Board members present were Tim Bates, Judy Smithey Dillow, Carroll West, and Jason Willard. Andy Moore came in at 6:27 p.m. Glendary Carter was not present.

The consent agenda was approved unanimously.

Melinda Oyler, Technology Coordinator, stated that due to circumstances that had arisen bid approval for the Laptops and the High School Business Lab be tabled at this time. Ms. Oyler then recommended approval of the bid submitted by Bytespeed for servers for the elementary school and the high school in the amount of \$2759.00 each for a total cost of \$5518.00. A motion was made by Carroll West and seconded by Judy Smithey Dillow to approve the Bytespeed bid as presented. The motion carried 5-0.

A motion was made by Judy Smithey Dillow and seconded by Carroll West to approve the proposed budget for the 2007-2008 school year. The motion carried 5-0.

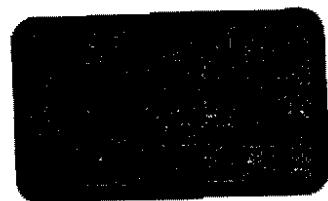
A motion was made by Judy Smithey Dillow and seconded by Jason Willard to approve the elementary handbook changes as presented by Principal Matt Donaghy. The motion carried 5-0.

X A motion was made by Jason Willard and seconded by Carroll West to approve the high school handbook changes as presented by principal Brian Cossey. The motion carried 5-0.

School Board:

Jerry Rice, President  
Carroll West, Vice President  
Judy Smithey Dillow, Secretary

Tim Bates  
Glendary Carter  
Andrew L. Moore  
Jason Willard



After addressing questions regarding Edline by two board members, a motion was made by Andy Moore and seconded by Carroll West to approve the middle school handbook changes as presented by principal Ray Scalf. The motion carried 6-0.

A motion was made by Jason Willard and seconded by Judy Smithey Dillow to accept the School Choice application from the PCSSD submitted by the parent. The motion carried 6-0.

A motion was made by Jason Willard and seconded by Judy Smithey Dillow to hire Dianna Bradshaw as GT coordinator and Jennifer Bajorek middle school science and math per recommendation of the superintendent. The motion carried 6-0.

The meeting adjourned at 6:40 p.m.

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Jerry Rice, President

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Judy Smithey Dillow, Secretary

ESD/sc