

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

BRENDA K. MONROE, ET AL.,

Plaintiff,

VS.

BOARD OF COMMISSIONERS OF THE
CITY OF JACKSON, TENNESSEE,
ET AL.,

AND

BRENDA K. MONROE, ET AL.,

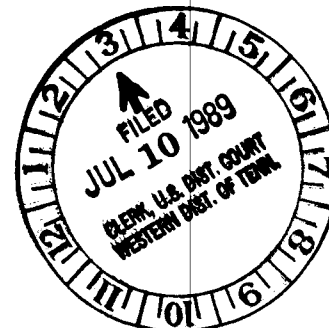
Plaintiffs,

VS.

MADISON COUNTY BOARD OF
EDUCATION,

Defendants.

Civil Action No. C- 1327



Civil Action No. C-2209-E

STIPULATION

The undersigned parties, acting by and through their attorneys, stipulate the following:

WHEREAS, plaintiffs commenced these actions to desegregate and requested the court to consolidate the defendant school systems of the City of Jackson and Madison County;

WHEREAS, an order has been entered by this court consolidating the within actions for the purpose of requiring the defendants to develop and implement a transition plan providing that all public schools within the City of Jackson will be operated and administered by the defendant school board of the City of Jackson;

WHEREAS, the voters of the City of Jackson and of Madison County approved in a special referendum election on May 25, 1989, a plan pursuant to Section 49-2-1201 et seq. Tennessee Code Annotated consolidating the defendant school systems;

WHEREAS, the plan provides that the consolidation plan goes into effect on July 1, 1989, or the date on which the court approves the plan, whichever is later;

WHEREAS, defendants have requested the court to approve the consolidation plan authorized by the voters in the referendum election;

WHEREAS, plaintiffs and United States of America have objections to the consolidation plan and believe that provisions of the plan may violate the rights of plaintiffs and members of the class represented by plaintiffs, and rights of the United States of America;

WHEREAS, the parties have agreed to cooperate in carrying out the consolidation without prejudice to the rights of plaintiffs and other affected persons, and the United States of America;

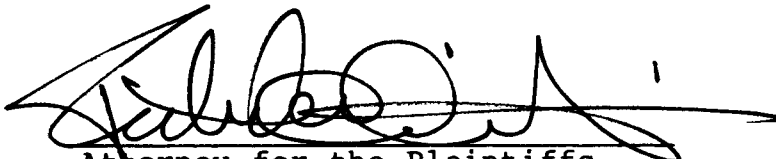
WHEREAS, plaintiffs and United States of America are agreeable to having the court enter an order approving said plan without prejudice to plaintiffs' rights and the members of the class, and rights of United States of America;

WHEREAS, the parties have agreed, in order to facilitate the consolidation, to the entry of an order approving the plan and reserving judgment on provisions of the plan that may violate the rights of plaintiffs and members of the class represented by plaintiffs, and rights of United States of America;

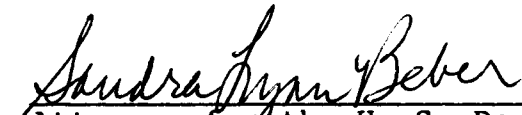
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WHEREAS, plaintiffs and United States of America believe that particular sections of the plan such as Sections 5, 12, 21, and other sections of the plan, may be administered or implemented in ways which violate the rights of plaintiffs and members of the class and rights of United States of America, and plaintiffs and United States of America reserve the right to object to any implementation or administration of the plan which has the effect of impairing, violating, or prejudicing plaintiffs' rights, and rights of United States of America;

THEREFORE, the parties have stipulated to the entry of the attached consent order approving the consolidation plan and reserving plaintiffs' and United States of America's rights, as specified in this stipulation and in the consent order.




Attorney for the Plaintiffs



Attorney for the U. S. Department
of Justice; James P. Turner
Acting Assistant Attorney General



Attorney for the City of Jackson



Attorney for the Madison
County Board of Education

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION



BRENDA K. MONROE, ET ALS

Plaintiff,

VS.

BOARD OF COMMISSIONERS OF THE
CITY OF JACKSON, TENNESSEE,
ET ALS,

Defendants,

AND

BRENDA K. MONROE, ET ALS,

Plaintiffs,

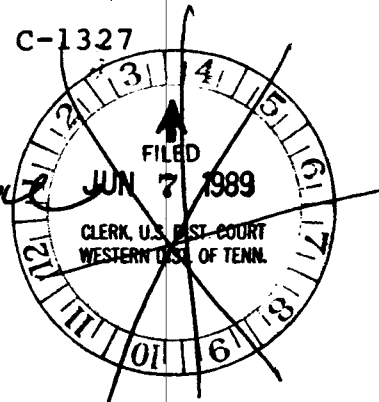
VS.

MADISON COUNTY BOARD OF
EDUCATION,

Defendants.

Civil Action No. C-1327

Order
Granted
Will Horton, Judge
6/8/89



Civil Action No. C-2209-E

This document entered on the jacket sheet in compliance
with Rule 58 and/or 79 (a) FRCP on 06-13-89.

JOINT MOTION TO SUBMIT SCHOOL CONSOLIDATION PLAN
AND FOR STAY OF ORDER

COME NOW the defendants, City of Jackson, et al. and Madison County Board of Education, and jointly move to submit the attached Plan for School Consolidation and Unification (herein the "Consolidation Plan") in substitution of the transition plans previously filed by the defendants on or about December 1, 1988, due to the passage of the Consolidation Plan in a special referendum election held May 25, 1989, and jointly move for a stay of the Court's order of October 28, 1988, and therefore, jointly move as follows: