

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

H(2292)83

CRATON LIDDELL, et al., )  
)  
Plaintiffs )  
)  
v. ) No. 72-100C(4)  
)  
THE BOARD OF EDUCATION OF )  
THE CITY OF ST. LOUIS, )  
STATE OF MISSOURI, et al., )  
)  
Defendants )

MOTION FOR LEAVE TO FILE MOTION OF  
ST. LOUIS TEACHERS UNION LOCAL 420 TO INTERVENE AS TO REMEDY

Comes now the St. Louis Teachers Union, Local 420, American Federation of Teachers and moves as follows:

1. That the Court enter its Order granting the Union leave to file the attached Motion to Intervene as to Remedy with the attached Intervenor's Complaint and Memorandum in Support of its Motion;

2. That the Court set such period of time as it deems reasonable for the parties hereto to file their responses to the Motion to Intervene;

3. That the Court set said Motion for argument and/or consideration at its regularly scheduled Motion day in this matter of May 4, 1983, or such other date as the Court may specially set;

4. That the Court order that the service of this Motion for Leave made on all those named on the Court's mailing list for Liddell v. Board of Education, 72-100C(4), with the Motion to Intervene, Intervenor's Complaint, and supporting Memorandum attached thereto, constitute service of said Motion to Intervene, Complaint, and Memorandum without further service;

5. That the Court enter such other and additional Orders as it may deem appropriate as to the filing of the Union's Motion to Intervene.

In support of this Motion, the Union states:

1. As set forth in detail in the attached Motion to Intervene, the St. Louis Teachers Union, Local 420, is an unincorporated labor organization organized for the purpose of representing teachers and other employees of the Board of Education of the City of St. Louis, Missouri, (the "Board"), a plaintiff herein, in regard to their wages, hours and other terms and conditions of employment and has been so recognized as bargaining agent by the Board;

2. That the Union objects to certain portions of the proposed Settlement Agreement as they pertain to the rights of the teaching and other employees the Union represents, and has accordingly filed the attached Motion to Intervene as of right under Federal Rule of Civil Procedure 24(2), seeking to intervene only on the issue of the appropriate remedy as it affects the rights of the teachers and other employees the Union represents and the rights of this Union as set forth in said Motion;

3. That the Motion to Intervene raises important issues pertaining to the success of the desegregation plan and the protection of teachers and staff rights thereunder to which the current parties to this proceeding have failed to give due consideration.

4. That justice requires that this Court permit filing of said Motion to Intervene so that said Motion is fully considered on its merits.

WHEREFORE, the St. Louis Teachers Union, Local 420 prays that its Motion for Leave to file the attached Motion to Intervene be granted and that the Court enter its Order permitting filing of said Motion as made herein and such other Orders as the Court may deem proper.

Bruce S. Feldacker, P. C.

By Bruce Feldacker  
Bruce S. Feldacker  
Attorney for Intervenors  
St. Louis Teachers Union Local 420  
American Federation of Teachers  
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221 N. LaSalle, Suite 2600  
Chicago, Illinois 60602

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion, with attachments, was mailed with U. S. postage prepaid, this 15th day of April, 1983, to all those named on the Court's mailing list for Liddell v. Board of Education, 72-100C(4).

Bruce Feldacker  
Bruce S. Feldacker

BRUCE S. FELDACKER, P.C.

ATTORNEY AT LAW

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AREA CODE 314-231-2970

M. BARRY FORMAN  
OF COUNSEL

BRUCE S. FELDACKER  
LINDA KRUEGER MACLACHLAN

April 15, 1983

The Honorable William L. Hungate  
Judge, United States District Court  
Eastern District of Missouri  
United States Court House  
11th and Market Streets  
St. Louis, Missouri 63101

Re: Craton Liddell, et al.,  
Plaintiffs v. The Board of  
Education of the City of  
St. Louis, State of Missouri,  
et al., Defendants  
Cause No. 72-100C(4)

Dear Judge Hungate:

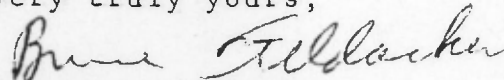
I enclose herewith a Motion for Leave to File a Motion to Intervene in the above matter on behalf of the St. Louis Teachers Union, Local 420 American Federation of Teachers along with the Motion to Intervene, the Intervenor's Complaint, and a Memorandum in Support of the Motion to Intervene. As you may note from the Certificates of Service, copies of these documents have been duly served on all those named on the Court's mailing list in this matter.

Failing to hear to the contrary, I will be present at the next Motion date in this matter on May 4, 1983.

I hereby certify that a copy of this letter was mailed, U. S. postage prepaid this 15th day of April, 1983 to all those named on the Court's mailing list for Liddell v. Board of Education, 72-100C(4).

Your consideration of this matter is appreciated.

Very truly yours,



Bruce S. Feldacker  
Attorney for St. Louis Teachers  
Union Local 420

BSF/nmc  
Encls.