

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

CIVIL ACTION No. 1:83-CV-00293-MPM

HORACE WILLIE MONTGOMERY, et al. **PLAINTIFFS**
v.

STARKVILLE MUNICIPAL SCHOOL DISTRICT, et al. **DEFENDANTS**

Consolidated with

WILLIAM H. HARRIS, III, et al. **PLAINTIFFS**
and

UNITED STATES OF AMERICA **PLAINTIFF-INTERVENOR**
v.

OKTIBBEHA COUNTY SCHOOL DISTRICT, et al. **DEFENDANTS**

**JOINT MOTION TO APPROVE DESEGREGATION
ORDER FOR CONSOLIDATED SCHOOL DISTRICT**

The United States and the Starkville-Oktibbeha Consolidated School District (“the District”), formerly known as the Starkville Municipal School District and the Oktibbeha County School District, by and through undersigned counsel, jointly move this Court to approve a new desegregation order for the District for the 2015-2016 school year, effective upon order of this Court. The United States and the District (“the Parties”) have worked together on this desegregation order and ask for expedited consideration of their motion.

Additionally, the Parties have reached agreements in the following areas, pursuant to their telephonic conference with the Court on July 1, 2015:

1. The Parties have agreed to reporting requirements for the 2015-2016 school year. As part of the desegregation order, the District shall submit a mid-year report to the United States and

the Court on January 15, 2016. Subsequently, all reports to the Court and the United States shall be submitted on or before June 30 of each year.

2. The Parties agree to work together to submit a proposed desegregation order to the Court on February 15, 2016, which shall govern the Consolidated District starting with the 2016-2017 school year and will be effective upon order of this Court and thereafter, until the District is declared unitary. The United States and the District intend to confer in good faith with the goal of reaching a mutually agreeable plan that meets the Defendants' desegregation obligations and can be fully implemented as soon as practicable.

Respectfully submitted, July 7, 2015.

STARKVILLE SCHOOL DISTRICT

/s/ Holmes S. Adams
Holmes S. Adams (MS Bar No. 1126)
John S. Hooks (MS Bar No. 99175)
Lindsey Oswald Watson (MS Bar No. 103329)
Adams and Reese LLP
1018 Highland Colony Parkway, Suite 800
Ridgeland, Mississippi 39157
T: 601.353.3234
F: 601.355.9708
holmes.adams@arlaw.com
john.hooks@arlaw.com
lindsey.watson@arlaw.com

OKTIBBEHA COUNTY SCHOOL DISTRICT

/s/ Bennie L. Jones, Jr.
Bennie L. Jones, Jr. (MSB No. 3185)
Law Offices of Bennie L. Jones, Jr. & Associates
P.O. Box 357
West Point, Mississippi 39773
T: 662.494.0643
bjonesjr111@aol.com

UNITED STATES OF AMERICA

VANITA GUPTA
Principal Deputy Assistant Attorney General

/s/ Victoria McNamee
ANURIMA BHARGAVA
WHITNEY M. PELLEGRINO
VICTORIA MCNAMEE (DC Bar. No. 1008599)
United States Department of Justice
Civil Rights Division
Educational Opportunities Section
950 Pennsylvania Avenue, NW, PHB 4300
Washington, DC 20530
Telephone: (202) 514-4092
Fax: (202) 514-8337
victoria.mcnamee@usdoj.gov

FELICIA C. ADAMS
United States Attorney
Northern District of Mississippi
900 Jefferson Avenue
Oxford, MS 38655-3608
Telephone: (662) 234-3351
Fax: (662) 234-3318

CERTIFICATE OF SERVICE

I do hereby certify that on this date, I filed electronically the foregoing with the Clerk of this Court using the ECF system which will send notification of filing to all registered counsel of record.

I also certify that I have on this date sent a copy of the foregoing via electronic mail and U.S. Mail to the following:

Mr. Wilbur O. Colom
Colom Law Firm
200 6th Street, Suite 700
Columbus, MS 39701

Dated: July 7, 2015.

/s/ Holmes S. Adams