

**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 HARRIS, 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 STARKVILLE-OKTIBBEHA CONSOLIDATED SCHOOL DISTRICT**

The Starkville-Oktibbeha Consolidated School District (“the Consolidated District”), formerly known as the Starkville Municipal School District and the Oktibbeha County School District, and the United States, by and through undersigned counsel, jointly move this Court to approve a new desegregation order for the Consolidated District, effective upon order of this Court. The United States and the Consolidated District (“the Parties”) have worked together on this desegregation order and ask for expedited consideration of their motion so the order may be implemented in time for the 2016-2017 school year.

1. On July 13, 2015, this Court approved a temporary desegregation order to govern the Consolidated District for the 2015-2016 school year. The Parties agreed to work together to submit a proposed desegregation order to the Court by February 15, 2016, which

would govern the Consolidated District from the date of entry by this Court until the Consolidated District achieves unitary status.

2. In the months since the Court approved the 2015-2016 order, the United States requested and the Consolidated District provided information regarding various aspects of the Consolidated District's operations including student assignment, faculty and staff, and facilities. The United States also conducted site visits to the Consolidated District on December 14–15, 2015 and January 5, 2016, which included interviews with district and school administrators and an evaluation of the Consolidated District's facilities.

3. From January 2–February 3, 2016, the Parties met by telephonic conference to begin negotiations. From February 5–11, 2016, the Parties exchanged drafts of the proposed desegregation order and continued negotiations.

4. On February 12, 2016, the Parties jointly submitted a Status Report to this Court [30], providing an update on the progress of negotiations and requesting the permission of the Court to submit a proposed desegregation order on March 4, 2016, and this Court issued a corresponding order on February 25, 2016 [31].

5. Since the February 12, 2016, Status Report, the Parties have continued to negotiate and have come to agreement regarding all of the terms of the proposed desegregation order now before the Court.

Respectfully submitted, March 2, 2016.

STARKVILLE OKTIBBEHA
CONSOLIDATED SCHOOL DISTRICT

/s/ John S. Hooks

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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.

Dated: March 2, 2016.

/s/ John S. Hooks