

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

LINDA STOUT, et al.,)	
)	
Plaintiffs,)	
)	CIVIL ACTION NUMBER:
UNITED STATES OF AMERICA,)	2:65-cv-396-MHH
)	
Plaintiff-Intervenor,)	<u>HOOVER CITY BOARD OF</u>
v.)	<u>EDUCATION</u>
)	
JEFFERSON COUNTY BOARD OF)	UNOPPOSED
EDUCATION, et al.,)	
)	
Defendants.)	

UNOPPOSED MOTION
TO EXTEND TIME FOR FILING
JOINT REPORT OF PARTIES

Comes now the undersigned attorney for the Hoover City Board of Education (hereinafter “Hoover”) to request a one week extension of time for the parties to file their joint report regarding the *Green* factors:

1. By Order dated November 12, 2014 (Doc. 989), the Court ordered the parties to file their joint report on or before January 30, 2015. (Copy attached as Exhibit 1.)
2. Extension Requested: To February 6, 2015. The one week extension became the discussion and agreement of the parties during a conference call on Monday, January 26, 2015.

The parties scheduled the conference call to assess what data remained to be produced, and what components of the *Green* factors would require additional discussion and review by the appellant review protocol by the parties.

3. The parties have endeavored in good faith to comply with the Court Order. A number of unanticipated events have arisen. These include the resignation of the Superintendent

of the Hoover City Board Andy Craig effective January 1, 2015; the protracted illness of the undersigned Hoover attorney; and now weather conditions threatening to paralyze the East Coast. And, finally, the necessity for the Board to address its position regarding two components of the six *Green* factors at a Board meeting scheduled for February 2, 2015.

NOTE: While the parties have authorized the undersigned to request a one week extension to file their joint report, the parties request no change in the date for the status conference at 10:30 a.m. on February 20, 2015.

Stated otherwise, the parties request the status conference to remain as set by the Court on February 20, 2015.

Respectfully submitted,

s/Donald B. Sweeney, Jr.

Donald B. Sweeney, Jr.
ASB-3803-w77d

OF COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Shaheena Ahmad Simons
Thomas A. Falkinburg
Natane Singleton
Veronica R. Percia
U.S. Department of Justice, Civil Rights Division
Educational Opportunities Section
950 Pennsylvania Avenue NW - PHB 4300
Washington, D.C. 20530

Sharon D. Kelly
Alice Martin
U.S. Attorney's Office
1801 4th Avenue North
Birmingham, AL 35203-2101

Carl Johnson
Whit Colvin
Bishop Colvin Johnson & Kent
1910 First Avenue, North
Birmingham, AL 35203-4006

Monique Lin-Luse
NAACP Legal Defense and Education Fund
40 Rector Street, 5th Floor
New York, NY 1006

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None

s/Donald B. Sweeney, Jr.

Donald B. Sweeney, Jr.