

1.

The TBNA is a Louisiana 501(c)(3) non-profit organization, organized under the laws of the State of Louisiana. The TBNA actively engages in property-use issues and seeks to preserve the character of its central Uptown neighborhood.

2.

The TBNA, on its own behalf and on behalf of the members' minor children (some of whom attend school at the Property), has a real and actual interest in ensuring that a charter school remains in operation on the Property. In addition, the TBNA and Mrs. Zapletal have a real and actual interest in: ensuring that Defendants enforce the laws designed to protect their property interests, protect the health and welfare of the neighborhood and Orleans Parish as a whole, protect the availability and quality of public education for their children by fostering the availability of quality neighborhood schools, protect the public by ensuring that the property at issue in this case—which is specially-designed and constructed to operate as a school and is fully-functioning as such—is not traded away for far less valuable, vacant land in another neighborhood that is not intended to be developed as a learning institution. See *Hunt v. Washington State Apple Advertising*