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CIVIL
DISTRICT COURT

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

No. 19-4914 DIVISION " 6 " - 6

THE TOURO BOULIGNY ASSOCIATION &
RELLA ZAPLETAL, INDIVIDUALLY, AND IN HER OFFICIAL CAPACITY AS
PRESIDENT OF THE TOURO BOULIGNY ASSOCIATION

v.

ORLEANS PARISH SCHOOL BOARD, DR. HENDERSON LEWIS, JR., IN HIS
CAPACITY AS SUPERINTENDENT OF ORLEANS PARISH SCHOOL BOARD

FILED: _____ DEPUTY CLERK

**MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

NOW INTO COURT, through undersigned counsel, come Plaintiffs, The Touro Bouligny Association (commonly referred to as The Touro Bouligny Neighborhood Association) (the "TBNA"), a Louisiana 501(c)(3) non-profit organization with its principal place of operation in Orleans Parish, Louisiana, and Rella Zapletal, individually, and in her official capacity as President of the TBNA ("Mrs. Zapletal") (collectively, "Plaintiffs"), who request that this Honorable Court issue a temporary restraining order preventing Defendants, Orleans Parish School Board ("OPSB")

issue a temporary restraining order preventing Defendants, Orleans Parish School Board (“OPSB”) and Dr. Henderson Lewis, Jr., in his capacity as Superintendent of OPSB (“Dr. Lewis”) (collectively, “Defendants”), from declaring the McDonogh Number 7 school site, located at 1111 Milan Street, New Orleans, Louisiana, 70115 (the “Property”), and currently occupied by Audubon Charter School, as “surplus” property on May 10, 2019, such that Defendants could immediately alienate or exchange the Property in violation of law and without making it available to chartering groups who may exist and have a need for the Property for the 2021-2022 school year and beyond. For the reasons more fully set forth in the accompanying *Memorandum in Support*, as well as in the *Verified Petition for Temporary Restraining Order, Injunctive Relief, Writ of Mandamus, Declaratory Judgment, and Other Relief*, also filed today, Plaintiffs request that a temporary restraining order be granted.

MAY 15 2019

VERIFIED

Amber Parker


AMBER PARKER
5-9-19