

STATE OF INDIANA)	IN THE LAWRENCE CIRCUIT COURT
)SS:	
COUNTY OF LAWRENCE)	FOR THE 2020 TERM
NLCS PARENTS GROUP LIMITED)	
)	Cause No.: 47C01-2002-PL-000155
<i>Plaintiff,</i>)	
)	
v.)	
)	
NORTH LAWRENCE COMMUNITY)	
SCHOOL CORPORATION,)	
)	
<i>Defendant.</i>)	

MOTION FOR PRELIMINARY INJUNCTION

COMES NOW Plaintiff NLCS Parents Group Limited, by and through counsel, Alexander W. Robbins, moves this Court to issue a preliminary injunction pending trial on the merits of Plaintiff's Complaint. In support of said motion, Plaintiff submits the following:

1. On or about February 4, 2020, Plaintiff filed a Complaint seeking, among other relief, injunctive relief voiding the final action taken by Defendant to close and consolidate several elementary and middle schools under Defendant's management.
2. Unless restrained by this Court, Defendant will engage in preparation for said closure and consolidation that will likely render Plaintiff's Complaint moot before the matter can be heard on its merits.
3. Specifically, Plaintiff has a good-faith belief that Defendant will engage in the following actions unless enjoined by this Court:
 - a. Approval and termination of teacher, administrative, and staff contracts for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - b. Reassignment of teachers, administrators, and other staff for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - c. Sale and/or lease of the real property, including school buildings and facilities where Fayetteville Elementary School, Heltonville Elementary

School, Springville Elementary School, Stalker Elementary School, and Shawswick Middle School are currently operated;

- d. Preparation of a Master Schedule for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - e. Assigning students to specific class rosters and electives for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - f. Approval of routes and contracts for bus drivers for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - g. Approval and termination of joint services and school nurses contracts for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - h. Approval and termination of athletics contracts with individuals coaches and contracts for competition entered with other schools for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools;
 - i. Approval of extra-curricular contracts for the 2020-21 academic year with plans to only operate two middle schools and five elementary schools; and
 - j. Approval of contracts with third-parties for technology or other services necessary to operate any new programs or online schools for the 2020-21 academic year in conjunction with plans to only operate two middle schools and five elementary schools.
4. The harm to Plaintiff if temporary injunctive relief is not granted far outweighs the harm to Defendant if this motion is granted.
 5. Plaintiff has no other adequate remedy at law and, particularly given that this is
 6. A preliminary injunction is necessary to preserve the status quo until the issues raised by Plaintiff's Complaint can be fully determined, and is appropriate because Plaintiff is likely to prevail on the merits of its claims.
 7. Plaintiff asks this Court to set a hearing on this matter, pursuant to Trial Rule 65(A)(3).

WHEREFORE, Plaintiff respectfully asks this Court to set a hearing on this Motion and to enjoin Defendant from taking the actions listed *supra*.

Respectfully Submitted,

/s/ Alexander W. Robbins
Alexander W. Robbins, 34363-53
The Law Office of Alex Robbins
Counsel for Plaintiff

CERTIFICATE OF SERVICE

Undersigned counsel affirms that on the date of filing, a copy of the foregoing filing was served on the following parties by e-service:

Greg Pittman
Counsel for Defendant

/s/Alexander W. Robbins
Alexander W. Robbins, #34363-53