

1ST JUDICIAL DISTRICT COURT FOR THE PARISH OF CADDO
STATE OF LOUISIANA

NO. _____

DIVISION “ ”

STEVAN WALPOOL and NIESHA WALPOOL in their individual capacities and
on behalf of their minor child E.W.,

Plaintiffs,

v.

KEITH BURTON, in his official
capacity as Superintendent of Caddo Parish
Schools; and the **CADDO PARISH SCHOOL
BOARD,**

Defendants.

FILED: _____

DEPUTY CLERK

**Verified Petition for Temporary Restraining Order, Application for Preliminary
Injunction, and Petition for Writ of Mandamus**

NOW INTO COURT COMES, through undersigned counsel, Stevan Walpool and Niesha Walpool (“Petitioners”) in their own individual capacity and on behalf of their minor child, E.W., who respectfully submit this Verified Petition for Temporary Restraining Order, an Application for a Preliminary Injunction, and a Petition for Writ of Mandamus, and represents the following:

PARTIES

1.

Petitioner Stevan Walpool is a person of the age of majority and is domiciled in Shreveport, Louisiana. Mr. Walpool is the father of E.W., a minor child who lives with Mr. Walpool. Mr. Walpool lives within the current attendance boundary for Queensborough Elementary.

2.

Petitioner Niesha Walpool is a person of the age of majority and is domiciled in Shreveport, Louisiana. Mrs. Walpool is the mother of E.W.

Caddo Parish Filed May 28, 2025 1:54 PM Bailey Barr Deputy Clerk of Court E-File Received May 28, 2025 1:36 PM	657485 C
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3.

E.W. was a kindergarten student at Queensborough Elementary in the 2024-2025 school year and would have attended the 1st grade at Queensborough Elementary in the 2025-2026 school year.

4.

Defendants are the Caddo Parish School Board and the Caddo Parish Schools Superintendent, Keith Burton, in his official capacity.

5.

Caddo Parish School Board is a political subdivision of the state of Louisiana with the power to sue and be sued. La. Const. VI, § 44(2); La. Rev. Stat. Ann. § 17:51.

6.

Keith Burton serves as the Superintendent of Caddo Parish Schools pursuant to La. Rev. Stat. Ann § 17:54 *et seq.* Defendants are located at 1961 Midway Ave., Shreveport, La 71108.

JURISDICTION AND VENUE

7.

Jurisdiction and venue are proper in this district pursuant to La Const. V, § 16 and La. Rev. Stat. Ann. § 13:5104(B).

LAW

8.

“A temporary restraining order shall be granted without notice from the court when all of the following occur: (1) It clearly appears from specific facts shown by a verified petition . . . that immediate and irreparable injury, loss, or damage will result to the applicant before the adverse party or his attorney can be heard in opposition; and (2) the applicant’s attorney certifies to the court in writing the efforts that have been made to give notice. . . .” La. Civ. Code. P. Art. 3603.

9.

“An injunction shall be issued in cases where irreparable injury, loss, or damage may otherwise result to the applicant. . . .” La. Civ. Code P. Art. 3601.

10.

“A writ of mandamus may be issued in all cases where the law provides no relief by ordinary means or where the delay involved in obtaining ordinary relief may cause injustice. . . .” La. Civ. Code P. Art. 3862. “A writ of mandamus may be directed to a public officer to compel the performance of a ministerial duty required by law. . . .” *Id.* at Art. 3863.

11.

Under Louisiana law, school boards “shall serve in a policymaking capacity that is in the best interests of all students enrolled in schools under the board’s jurisdiction.” La. Rev. Stat. Ann. § 17:81(A)(1). Further, “[e]ach city or parish school board is authorized to make such rules and regulations for its own government, not inconsistent with law or with the regulations of the State Board of Elementary and Secondary Education, as it may deem proper.” *Id.* at (C).

12.

Under La. Rev. Stat. Ann. § 17:104.1, local school boards have the authority and responsibility “to provide for the assignment, transfer, and continuance of pupils among and within the public schools within its jurisdiction . . . [and] to prescribe rules and regulations pertaining to these functions. . . .”

13.

Caddo Parish School Board, with its authority from state law, enacted a policy that states: “School attendance boundaries shall be approved by the Caddo Parish School Board. . . . Prior to the adoption of school boundaries, the School Board **shall** conduct public hearings for the purpose of receiving input regarding proposed boundary changes. Official notice of these hearings **shall** be published in the official journal of the School Board and other appropriate publications.” Caddo Parish School Board Policy AD, “School Attendance Districts”, available at <https://caddoparishla.github.io/> (emphasis added).

FACTS

14.

On April 15, 2025, the CPSB held a regularly scheduled school board meeting pursuant to La. Rev. Stat. Ann. § 17:81(D)(1) (hereinafter “the April School Board meeting”).

15.

CPSB posted its agenda online on BoardDocs (<https://www.boarddocs.com/la/caddo/Board.nsf>) prior to the April School Board meeting.

16.

At the April School Board Meeting, the CPSB voted on the following agenda item, which is at issue:

Item 8.05: Consideration to approve staff to coordinate the closure of Queensborough Elementary at the end of the 2024-25 school year with students zoned to attend J. S. Clark Academy and to prepare the property to be listed for sale at its appraised value with our Listing Agent and dedicate proceeds from the sale to an account dedicated to future construction of instructional facilities;

Caddo Parish School Board Meeting Agenda, April 15, 2025, available at <https://www.boarddocs.com/la/caddo/Board.nsf>.

17.

Item 8.05 was voted on at the April 15, 2025 Caddo Parish School Board meeting, and passed with the following votes: 8 yes votes; 3 no votes, and 1 abstention.

18.

At the April School Board meeting, and without holding the requisite public hearings, CPSB considered and passed Item 8.05, which will close Queensborough Elementary School after the 2024-25 school year. The last day of school for students at Queensborough Elementary was May 15, 2025.

19.

At the April School Board meeting, CPSB voted to change the attendance boundary so that students who attended Queensborough Elementary in the 2024-25 school year will attend J.S. Clark Academy in the 2025-26 school year. CPSB also voted to list the Queensborough property for sale. *See* Exhibit A.

20.

Exhibit A demonstrates that the CPSB knew and planned to change the attendance boundary for students attending Queensborough Elementary.

21.

With this vote, the Caddo Parish School Board created, *ultra vires*, new attendance boundaries for Queensborough Elementary and J.S. Clark Academy.

22.

After the April School Board meeting, Petitioners received a letter from Defendants stating that “the Caddo Parish School Board **approved attendance zone changes** for the students of Queensborough Elementary. . . . [Y]our child [E.W.] will be zoned to attend the new J.S. Clark Academy. . . .” (attached as Exhibit B, redacted).

23.

Pursuant to state law, Caddo Parish School Board enacted a “School Attendance Districts” policy that states in part: “Prior to the adoption of school boundaries, the School Board shall conduct public hearings for the purpose of receiving input regarding proposed boundary changes. Official notice of these hearings shall be published in the official journal of the School Board and other appropriate publications.” Policy AD.

24.

CPSB did not hold public hearings for the purpose of receiving input regarding the proposed boundary changes prior to the April 15, 2025 school board meeting or prior to voting on

Item 8.05. Moreover, official notice of such public hearings was never posted since such hearings were never held.

25.

At the April School Board meeting, School Board member Dr. Terence Vinson asked Defendant Superintendent Keith Burton whether community meetings had been held at all of the schools subject to “particular closures,” and Defendant Burton responded, “no, they were not,” admitting that no public hearings occurred. Caddo Parish School Board Meeting, Meeting Video at 2:33:35-2:33:47, available at <https://www.youtube.com/watch?v=yPD41S5ccBE&t=9227s>.

Temporary Restraining Order and Preliminary Injunction

26.

A temporary restraining order is appropriate because immediate and irreparable injury, loss, or damage will occur before the adverse party or attorney can be heard.

27.

The irreparable injury at issue is that Defendants will permanently close Queensborough Elementary and reassign Queensborough students, including E.W., to J.S. Clark even though Defendants violated school board policy, depriving Petitioners and other Queensborough parents and students of notice and the opportunity to attend public hearings to provide input regarding proposed boundary changes.

28.

The last day of school at Queensborough Elementary was May 15, 2025. Upon information and belief, Defendants have already begun the process of closing Queensborough Elementary by transferring student files to J.S. Clark.

29.

Without a temporary restraining order, Defendants will continue the process of closing Queensborough Elementary by reassigning and/or terminating Queensborough employees, physically moving school furniture and movable property, and by listing the property for sale.

30.

The sale of property is imminent because Defendants already have an interested buyer, which, upon information and belief, is Willis Knighton Hospital. *See* Exhibit A. The sale of the property will foreclose Petitioners and E.W. from the opportunity to participate in required public hearings because the property will no longer be owned by CPSB.

31.

Such losses, including the loss of opportunity to be heard at a public hearing because Defendants have shuttered a school and sold a school property, cannot be measured by a pecuniary standard or adequately compensated in money damages. *Mouton v. Rapides Parish Police Jury*, 927 So.2d 1195, 1198 (La.App. 3 Cir. 4/5/06).

32.

On May 20, 2025, Counsel for Petitioners sent a letter to Defendants via email providing notice of the issues contained in this petition and that Petitioners would file for a Temporary Restraining Order in compliance with La. Civ. Code P. Art. 3603(A)(2) (attached as Exhibit C).

Writ of mandamus

33.

The duty to hold public hearings pursuant to Caddo School Board Policy is a ministerial duty, not discretionary, and there is no excuse for failing to perform this ministerial duty.

34.

The regularly scheduled School Board meeting held on April 15, 2025 does not constitute a public hearing as contemplated by Policy AD. *See, e.g., Hunter's Grove Homeowners Ass'n v. Calcasieu Parish Police Jury*, 422 So.2d 673 (La.App. 3 Cir. 11/12/1982).

35.

A writ of mandamus is the only available remedy for Petitioners. *Taube v. St. Charles Parish Sch. Bd.*, 787 So.2d 377 (La.App. 5 Cir. 4/11/01).


All of the attached exhibits are incorporated in this Petition by reference, as if same were copied herein in extenso.

WHEREFORE, Petitioners pray:


- I. That a Temporary Restraining Order issue herein, according to law and without bond, directed to the Defendants, Caddo Parish School Board and Caddo Parish Superintendent, restraining, enjoining and prohibiting Defendants, its agents, employees and all other person, firms, or corporations acting or claiming to act on Defendants' behalf from:
 - a. closing or shutting down Queensborough Elementary school after the 2024-25 school year, including transferring student files; notifying families of the closure; reassigning students to J.S. Clark; reassigning Queensborough employees and staff to other schools in the district; changing transportation routes; terminating Queensborough employees and staff; eliminating or moving movable property from the Queensborough Elementary property;
 - b. changing, altering, or adjusting Queensborough Elementary school's attendance boundaries;
 - c. taking any action to list Queensborough Elementary school or any of the Queensborough Elementary school property, located at 2701 Catherine St., Shreveport, Louisiana 71109, for sale or otherwise encumber said property; and
 - d. from selling the Queensborough Elementary school property, located at 2701 Catherine St., Shreveport, Louisiana 71109, to any buyer.
- II. That Defendants, Caddo Parish School Board and Caddo Parish Superintendent, be duly ordered to show cause on the date and time fixed by this Court why a preliminary injunction in the form and substance of the temporary restraining order prayed for above should not issue herein; that after due proceedings had, there be judgment herein making the said rule absolute and that a preliminary injunction be issued in the form and substance prayed for herein;

- III. For an Order of Mandamus issue herein requiring Defendants to issue notice and hold public hearings for the purpose of receiving input regarding the proposed boundary changes to Queensborough Elementary;
- IV. Defendants be served with a certified copy of this petition and ordered to show cause on the date and hour assigned by this Court why the writ of mandamus issued herein should not be made peremptory at its sole cost;
- V. After the hearing on this application, the writ of mandamus directed to Defendants be made peremptory and be cast for all the costs of this proceeding; and
- VI. For reasonable attorneys' fees as well as interest and all costs of these proceedings together with any other such additional relief, at law or equity, that the Court may deem just and appropriate under the premises.

Respectfully submitted,


Lauren A. Winkler, LA Bar No. 39062
Southern Poverty Law Center
201 St. Charles Ave., Suite 2000
New Orleans, LA 70130
lauren.winkler@splcenter.org
Phone: (504) 442-1165
Fax: (786) 237-2949

SWORN AND SUBSCRIBED
BEFORE ME THIS 28th DAY
OF May, 2025.


NOTARY PUBLIC
Print Name Susan Fijman
Notary/Bar No. 174833



SUSAN FIJMAN
NOTARY PUBLIC
Notary ID No. 174833
Orleans Parish, Louisiana

PLEASE SERVE:

Caddo Parish School Board
Through its President:
Ms. Jasmine Green
1961 Midway Ave.
Shreveport, La 71108

Caddo Parish Schools Superintendent Keith Burton
Mr. Keith Burton
1961 Midway Ave.
Shreveport, La 71108

Exhibit A




CADDO PARISH SCHOOL BOARD


1961 MIDWAY AVENUE • SHREVEPORT, LOUISIANA 71108

Phone 318-603-6300 • Fax 318-603-6450

Keith Burton
Superintendent

To: Caddo Parish School Board

From: Keith Burton, Superintendent 

Originator
of Document: Patrick Greer, Chief Operations Officer 

Date: April 7, 2025

Subject: Queensborough Elementary Closure and Listing for Sale

At the Buildings, Grounds, and Security Committee meeting on April 1, 2025, a motion was made by the committee to the CPSB for approval of Staff to coordinate plans for closure of Queensborough Elementary School at the end of the 2024-25 school year, with students to be zoned to attend J.S. Clark K-8 Academy, and to prepare the property to be listed for sale at its appraised value with our Listing Agent and dedicate proceeds from the sale to an account dedicated to future construction of instructional facilities.

Built in 1924, the school is located at 2701 Catherine Street in Shreveport, Louisiana and has a lot size of 5.36 acres. Student enrollment as of Oct. 1, 2024 was 222 and the capacity is 391. Staff has received a formal purchase proposal from a local organization, which expressed significant interest should the property be listed for sale.

If the closure is approved and the students are zoned for J.S. Clark K-8 Academy, this would create a dedicated attendance zone with an aligned feeder pattern to Booker T. Washington High School. J.S. Clark Elementary was built in 1958 and the enrollment as of Oct. 1, 2024 was 429, with a capacity of 1,029. The proposed closure and zoning adjustment would bring the enrollment to approximately 651 students, with the possibility for increasing due to the school's open enrollment component.

Staff recommends that the Board approves the recommendation from the Buildings, Grounds, and Security Committee meeting on April 1, 2025 to close Queensborough Elementary at the end of the 2024-25 school year with students zoned to attend J.S. Clark K-8 Academy. List the property for sale at its appraised value with our Listing Agent and dedicate the proceeds from the sale to an account dedicated to future construction of instructional facilities.

Attachment

0425
PG

Draft SY2025-2026 School Merge Proposal

Queensborough to J.S. Clark

Enrollment

Site	PreK	K	1	2	3	4	5	6	Total
J. S. Clark Elementary School	25	30	69	61	63	57	55	69	429
Queensborough Elementary School	15	17	40	29	25	29	41	26	222
New J.S. Clark	40	47	109	90	88	86	96	95	651

Attendance Boundary

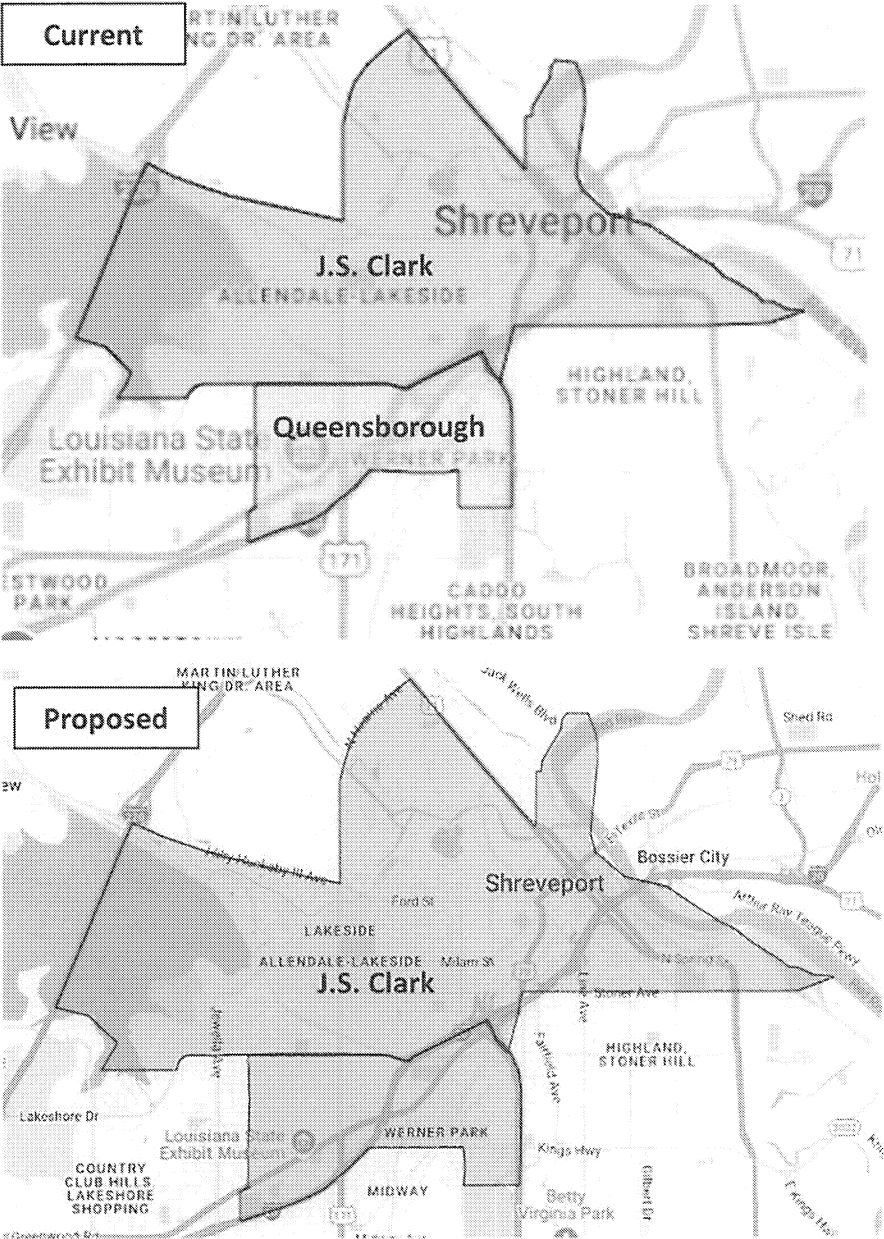


Exhibit B

Dear Parent/Legal Guardian of:

██████████
Queensborough Elementary School

At its April 15, 2025 meeting, the Caddo Parish School Board approved attendance zone changes for the students of Queensborough Elementary, which will close at the end of the 2024-25 school year.

Based upon projected academic placement within grades **PreK-5th** and for **current 5th graders rolling up to 6th grade**, your child your child ██████████ will be zoned to attend the new **J. S. Clark Academy for the 2024-25 school year**. This school assignment is based upon your JCampus address as of May 9, 2025:
██████████

In order to ensure that students and parents are comfortable with this zone change, a student orientation and tour of the J. S. Clark Academy campus was held on May 1, 2025 from 9:00am-11:00am. A Parent Orientation meeting was also held on May 1, 2025 at 5:30pm. School Administration can be contacted to address any questions or concerns from Parents as planning begins for the 2025-26 school year.

A follow-up communication will be sent by June 11, 2025. Unless you have a change in residential address on file or received an approved transfer, **J. S. Clark Academy** will be your child's zoned school.

Bus transportation will be provided to and from school in accordance with the CPSB Transportation Policy. Specific bus stop information for your child will be available on the CPSB website at <http://www.caddoschools.org> under the "Find my Bus Stop" link, beginning August 1, 2025.

If the information in this notification is incorrect, please contact us at your earliest convenience at the CPSB Attendance Department at (318)603-6308.

**The Attendance Department reserves the right to amend placement based on technical errors.*

Exhibit C



Southern Poverty Law Center
201 St. Charles Avenue
Suite 2000
New Orleans, LA 70170
spicenter.org

May 20, 2025

Keith Burton, Superintendent
Jasmine Green, President
Caddo Parish School Board
1961 Midway Ave.
Shreveport, La 71108

SENT VIA EMAIL

Dear President Green & Superintendent Burton:

We write on behalf of our clients, Stevan Walpool and Niesha Walpool and their minor child, E.W. E.W. is a student at Queensborough Elementary School who was enrolled in kindergarten in the 2024-25 school year. He and his family were expecting him to attend Queensborough for the 1st grade in 2025-2026.

On April 15, 2025, the Caddo Parish School Board (“CPSB”) voted to close Queensborough Elementary after the 2024-2025 school year and to list the property for sale.

When CPSB voted to close Queensborough (as well as two other schools), it voted to change the school’s attendance boundaries. Students in the Queensborough attendance boundary, including E.W., will be required to attend J.S. Clark Elementary in 2025-26.

Because the Caddo Parish School Board failed to adhere to its own policies, the Board did not have the power to vote at the April school board meeting to close Queensborough Elementary, and it did not have the power to change Queensborough’s attendance boundaries. Accordingly, the School Board’s actions at the meeting are null and void.

Caddo Parish School Board Policy AD, “Student Attendance Districts,” states: “School attendance boundaries shall be approved by the Caddo Parish School Board. . . . Prior to the adoption of school boundaries, the School Board shall conduct public hearings for the purpose of receiving input regarding proposed boundary changes. Official notice of these hearings shall be published in the official journal of the School Board and other appropriate publications.”

To our knowledge, the Caddo Parish School Board did not hold public hearings for the purpose of receiving input regarding proposed boundary changes. In fact, at the April 15, 2025 meeting, School Board Member Dr. Terence Vinson asked Superintendent Keith Burton whether

community meetings had been held at all of the schools subject to “particular closures.” Superintendent Burton responded, “no, they were not.” Caddo Parish School Board Meeting, Meeting Video at 2:33:35-2:33:47, available at <https://www.youtube.com/watch?v=yPD41S5ccBE&t=9227s>. Moreover, CPSB did not issue notices for such hearings, as they did not take place.

We are writing on behalf of Mr. and Ms. Walpool and their minor child to demand that CPSB:

1. cease all actions, plans, and activities to close Queensborough Elementary school, including but not limited to: transferring student files; notifying families of the closure; reassigning students to J.S. Clark; reassigning Queensborough employees and staff to other schools in the district; changing transportation routes; terminating Queensborough employees and staff; eliminating or moving movable property from the Queensborough Elementary property;
2. keep Queensborough Elementary open until CPSB follows proper policy and procedure for changing attendance boundaries;
3. not list Queensborough Elementary for sale, take steps to secure a buyer, or engage in negotiations or conversations with potential buyers about selling the school property;
4. acknowledge at its regularly scheduled school board meeting on 5/20/25 that the votes to close Queensborough, Blanchard, and Eighty-First Street ECE are void;
5. adhere to Policy AD and issue notices for public hearings for the purpose of receiving input regarding the proposed boundary changes, in accordance and hold such public hearings;
6. hold more than three public hearings, and issue notice for such, for the purpose of receiving input regarding proposed boundary changes.

Notice to Preserve Evidence

We also write to demand that you preserve and not alter any evidence relating to the School Board’s decision to change attendance boundaries, including, but not limited to: communications about the decision to change the attendance boundaries for Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary; all reports, studies, data, publications, plans or information gathered or distributed regarding the closure of Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary or changing the attendance boundaries thereof; documents and files to inform the public about the closure of Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary or changing the attendance boundaries thereof.

This preservation is to include any and all word documents or other native file formats with metadata. Such documents subject to preservation include communications, including but not limited to emails, call logs, and text messages, between Caddo Parish School Board members, Caddo Parish School Board staff, and between Caddo Parish School Board staff and outside parties,

concerning closing Queensborough Elementary, Eighty-First Street ECE, and Blanchard Elementary or changing the attendance boundaries thereof.

We request a response no later than 12:00 pm CT on May 21, 2025. If we have not heard from you by then, we will advise our clients of their right to seek judicial remedy, including their right to seek a temporary restraining order (TRO) to prevent CPSB and its Superintendent from closing Queensborough or selling the property due to its failure to adhere to school board policy.

Sincerely,



Lauren Winkler, Esq.

Luz Lopez, Esq.

Camille Pendley Hau, Esq.

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Phone: 504-442-1165

APPENDIX 9.6
LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688, Part G, §13 of the Louisiana Supreme Court
General Administrative Rules, and Appendix 9.6 of the Louisiana District Court Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel’s authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption: Walpool v. Burton

Court: 1st Judicial District Court_____ **Docket Number:** _____

Parish of Filing: Caddo Parish_____ **Filing Date:** 05/28/2025_____

Name of Lead Petitioner’s Attorney: Lauren Winkler_____

Name of Self-Represented Litigant: _____

Number of named petitioners: 3**Number of named defendants:** 2

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

- | | |
|---|--|
| <input type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage |
| <input type="checkbox"/> Auto: Wrongful Death | <input type="checkbox"/> Auto: Uninsured Motorist |
| <input type="checkbox"/> Asbestos: Property Damage | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Premise Liability |
| <input type="checkbox"/> Intentional Bodily Injury | <input type="checkbox"/> Intentional Property Damage |
| <input type="checkbox"/> Intentional Wrongful Death | <input type="checkbox"/> Unfair Business Practice |
| <input type="checkbox"/> Business Tort | <input type="checkbox"/> Fraud |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Professional Negligence |
| <input type="checkbox"/> Environmental Tort | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Toxic Tort |
| <input type="checkbox"/> Legal Malpractice | <input type="checkbox"/> Other Tort (describe below) |
| <input type="checkbox"/> Other Professional Malpractice | <input type="checkbox"/> Redhibition |
| <input type="checkbox"/> Maritime | <input type="checkbox"/> Class action (nature of case) |
| <input type="checkbox"/> Wrongful Death | |
| <input type="checkbox"/> General Negligence | |

Please briefly describe the nature of the litigation in one sentence of additional detail:
Petition for TRO, PI and Writ of Mandamus against the Caddo school system to order them to follow school board policy regarding changing attendance zones.

Following the completion of this form by counsel, counsel’s representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Name Lauren Winkler_____Signature _____

Address 201 St. Charles Ave., Suite 2000, New Orleans, LA 70170_____

Phone number: 504-442-1165 _____E-mail address: lauren.winkler@splcenter.org _____