

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS

SUPERIOR COURT

DAVID K. TAYLOR

v.

THE OYSTER RIVER COOPERATIVE SCHOOL BOARD

EX PARTE MOTION FOR TEMPORARY INJUNCTION

PURSUANT TO RSA 91-A:7

NOW COMES David K. Taylor (“Taylor”), a citizen of the town of Durham, New Hampshire, and submits the following *Ex Parte* Motion for Temporary Injunction, whereby the petitioner seeks an order compelling the defendants, the Oyster River School Board (the Board), to temporarily terminate all aspects of the current search for a Superintendent for the Oyster River Cooperative School District pending a hearing in this matter.

1. This case is a petition for injunctive relief pursuant to RSA 91-A:7, filed by Taylor on January 3, 2012.
2. Taylor complains against the defendant and seeks relief pursuant to RSA 91-A for an order invalidating the actions of the Board taken at meetings in violation of RSA 91-A.
3. The Board is conducting a search for a Superintendent including a series of meetings alleged in the petition to be in repeated violation of various requirements of RSA 91-A.

4. Included in these violations is a nomination at the December 21, 2011 meeting of community members to the Screening Committee for the Superintendent search by a form of secret ballot in violation of RSA 91-A:2 II.
5. The first meeting of the Screening Committee is scheduled for the evening of January 3, 2012.
6. The Screening Committee involves 11 members of the Oyster River School District and community who will be volunteering a significant amount of their time over the next 2 weeks for this effort.
7. The Screening Committee will interview in person at an Oyster River School District facility several candidates for Superintendent. These candidates may need to travel to these interviews, accruing expenses that will be paid to a large part from funds raised from taxes.
8. Within 2 weeks, the Screening Committee will recommend finalist candidates to the Board. The names of the finalist candidates will become public, disclosing to the candidates' current employers that the candidates are considering changing jobs.
9. If Taylor is granted the remedies prayed for in the petition, the efforts and expenses of the Screening Committee members and candidates will have been wasted.

WHEREFORE, Taylor requests that this Court:

- A. Grant the present *Ex Parte* Motion for Temporary Injunction;
- B. After granting the present motion, compel the Board to temporarily terminate all aspects of the current Superintendent search pending the outcome of this case;
- C. Declare such other relief as may be just and equitable.

Respectfully submitted,

Dated: January _____, 2012

David K. Taylor, pro se

VERIFICATION

I hereby verify that I have read the allegations set forth in the foregoing *Ex Parte* Motion for Temporary Injunction and such allegations are true to the best of my knowledge, information and belief.

By: _____

David K. Taylor, *pro se*

STATE OF NEW HAMPSHIRE

COUNTY OF STRAFFORD

Personally appeared before me, this _____ day of January, 2012, _____ and made solemn oath that the statements made above are true and accurate to the best of his knowledge and belief.

Notary Public/Justice of the Peace

CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was this date mailed to the Defendants.

David K. Taylor, *pro se*