

The United States' Motion is made upon the following grounds:

(1) The Alabama Trade School and Junior College Authority (hereinafter the "Authority") is a public body corporate created by the State of Alabama. Under Alabama Law, the Authority's powers include:

* * * [T]o provide for acquiring and improving sites for additional trade schools and junior colleges, constructing, acquiring, reconstructing, improving and altering buildings therefor and purchasing, acquiring and installing the original equipment thereof, and to make capital improvements to existing trade schools and at institutions of higher learning heretofore or hereafter established. 12A Ala. Code (Mitchie 1969) Tit. 52, §509 (84).

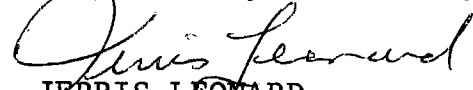
(2) Said Authority is comprised of the Governor of Alabama, the Honorable Albert P. Brewer, President; the State Superintendent of Education, Dr. Earnest Stone, Vice President; and the Director of Finance of the State of Alabama, Robert B. Ingram, Secretary.

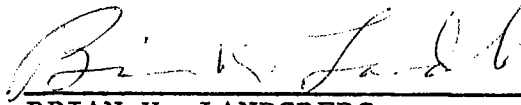
(3) On August 14, 1970, this Court ordered that facilities should be constructed and a curriculum developed that will expand the program at Mobile State so that it is comparable to that offered in and by the James H. Faulkner State Junior College. Since control of the expenditure of capital outlay for Junior Colleges is in the hands of said Authority

and its members, it is therefore necessary to add
these party defendants.

IRA DE MENT
United States Attorney

Respectfully submitted,


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CERTIFICATE OF SERVICE

I, Craig M. Crenshaw, attorney of the United States hereby certify that service was made of the attached Motion to add Parties Defendant on the 28th day of August, 1970, by Mail sent to the attorneys for the plaintiffs and defendants as follows:

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