



Norman Hanson & DeTroy, LLC  
Attorneys at Law  
Two Canal Plaza  
P.O. Box 4600  
Portland, ME 04112-4600

T 207.774.7000  
F 207.775.0806  
[www.nhdlaw.com](http://www.nhdlaw.com)  
[rpierce@nhdlaw.com](mailto:rpierce@nhdlaw.com)

**Russell B. Pierce, Jr., Esq.**

Direct: (207) 553-4621

January 28, 2022

***VIA COURIER***

Julie Howard, Manager  
York County Court Operations  
York County Superior Court  
45 Kennebunk Road  
Alfred, ME 04002

RE: Regional School Unit 21 v. Town of Kennebunk, et al  
Civil Action, Docket No. CV-2022-007  
Our File No. (503134)

Dear Julie:

Plaintiff RSU 21 respectfully requests that the Court notice an immediate emergency hearing on Plaintiff's pending motion and application for preliminary injunctive relief, seeking to stop the recall election process currently underway in Kennebunk. Last night, on January 27, 2022, Kennebunk suddenly issued notice to the school board director who is the subject of the recall proceedings, of an order of recall election if the director does not resign within 5 days. The Town has invited submission of nomination papers. The Town has apparently scheduled a recall election on March 29, 2022. Plaintiff RSU 21 contends that the current municipal recall procedure is invalid, and thus its only recourse is the pending request for this Court to intervene to enjoin the Town's recall proceedings, and restore the status quo that existed at the time of commencement of the suit, so that this weighty legal issue can be fully and fairly decided through careful deliberation by the Court. It is in the public's interest to have the Court intervene within the 5-day window, which Kennebunk has given to the school board director to consider resignation.

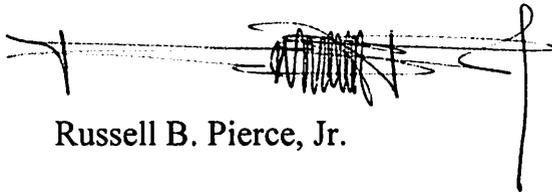
Plaintiff's counsel is available on January 31, February 1, and February 2 to have this matter heard for an emergency temporary restraining order, based on the reasons set forth in Plaintiff's pending motion for preliminary injunctive relief and in the application for injunctive relief contained in the Complaint. M.R. Civ. P. 65.

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Please bring this correspondence to the attention of the presiding Justice, as soon as possible. Counsel representing all parties have been copied on this correspondence.

Thank you for your assistance in this regard. If you should have any questions or concerns, please do not hesitate to contact this office.

Very truly yours,

A handwritten signature in black ink, appearing to read "Russell B. Pierce, Jr.", written over a horizontal line. The signature is stylized and somewhat messy, with a long vertical stroke extending downwards from the end.

Russell B. Pierce, Jr.

RBP/bee

Enclosures

cc: Natalie Burns, Esq. (*via email*)  
Thomas Danylik, Esq. (*via email*)  
Timothy S. Murphy, Esq. (*via email*)