## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

OLIVER BROWN, et al.,

Plaintiffs,

and

CHARLES and KIMBERLY SMITH, minor children, by their mother and next friend, LINDA BROWN SMITH, et al.,

No. T-316

Intervening Plaintiffs,

vs.

BOARD OF EDUCATION OF TOPEKA, SHAWNEE COUNTY, KANSAS, et al.,

Defendants.

ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 11
OF THE SECOND SET

ll. Is the four-step desegregation plan outlined in answer to the First Set of Interrogatories the only plan for desegregation proposed by, presented to, considered or implemented by the defendant Board of Education?

## ANSWER:

Based upon the documents available to Unified School
District No. 501, it appears that the four-step desegregation
plan outlined in answer to Interrogatory No. 23 of Intervening
Plaintiffs' Interrogatories--First Set is the only plan for
desegregation proposed by, presented to, considered or
implemented by the Board of Education of Topeka, Shawnee County,
Kansas, the predecessor of Unified School District No. 501.
No desegregation plans have been proposed by, presented to,
considered or implemented by Unified School District No. 501.

The answer to Interrogatory No. 11 was prepared under the direction of W. Wayne Warner, Assistant Superintendent for Business Services, Unified School District No. 501.

## VERIFICATION

STATE OF KANSAS COUNTY OF SHAWNEE )

The undersigned, of lawful age, being first duly sworn upon his oath, deposes and states:

That he is Assistant Superintendent for Business Services for Unified School District No. 501, that he has read the answer to Interrogatory No. 11 of Intervening Plaintiffs' Interrogatories--Second Set which was prepared under his general direction and supervision and such answer is true and correct to the best of his knowledge and belief.

Further affiant saith not.

W. Wayne Warner

Subscribed and sworn to before me this 30 day of March, 1982.

my appointment expires: June 29, 1985

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501 TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 11 OF THE SECOND SET was served by hand delivering the same this 3044 day of March, 1982, to attorneys for Intervening Plaintiffs by serving Richard Jones, 605 S.E. Quincy, Suite 1, Topeka, Kansas 66603.

Găry/Sebelius

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