



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.	)	

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PLAINTIFFS' INTERROGATORIES TO  
DEFENDANT BOARD OF EDUCATION  
(Second Set)

Plaintiffs, pursuant to Rule 33 of the Federal Rules of Civil Procedure request that the Defendant Board of Education (U.S.D. No. 501) answer under oath within thirty (30) days the following written interrogatories. These interrogatories shall be answered as of the day in which the interrogatories are filed except where otherwise indicated and shall be deemed continuing up to the date of trial in that supplemental answers shall be supplied if additional or different information becomes known to Defendants. Where the answer to any of the interrogatories set forth below is a reference to any document, Plaintiffs hereby request pursuant to Rule 34 of the Federal Rules of Civil Procedure that the Defendants make available such document for inspection and copying at Plaintiffs' attorneys' offices or some other mutually convenient place within thirty (30) days after service of these interrogatories.

1. State the amount of federal assistance received, and the number of student and teacher participants, for each school year (1954 to the present) by each school benefitting from programs under Title I.

2. State the amount of federal assistance received each year (1954 to 1981) by each school benefitting from programs under Title II Elementary Guidance; Title III Reading Clinics, Centers and Services; Title IV Career Exemplary Center; 1969 Special Needs Project; Area Vocational Technical School Program; Correctional Vocational Training Center; Communication Skills; Work Study; Special Needs; PreVocational Exploratory (P.E.P.); HERO/Food Service; Follow Through; CETA; Neighborhood Youth Corps; Manpower Development Training Projects; Federal Revenue Sharing; and School Food Service Programs. Where a single program offered services to students or teachers from more than one school, state how many students from each school and how many teachers from each school participated.

*for each school where program  
subject was located*

3. Describe by year and by race participants in the CETA, Headstart, and Follow Through programs. Check

4. State the number of full time classroom teachers and the total annual salaries paid to those teachers for each school in each of the last ten years

5. State the number of full time administrators and the total annual salaries paid to them for each school in each of the last ten years.

6. Were there any different attendance zone configurations for elementary, Junior High, or High Schools between 1951 and 1963, other than the ones you identified in answer to the First Set of Interrogatories? RF 50---

7. Provide all information identifying students by race and by school of attendance from each optional attendance zone described in answer to <sup>↑↑s'</sup> Question No. ~~of the~~ First Set of Interrogatories.

8. From 1950 to the present, for all Junior High Schools please identify entering students for each year by race and by elementary school of origin.

9. From 1950 to the present, for all High Schools please identify entering students for each year by race and by Junior High School of origin.

10. For each Junior High and High School in existence and for each year during the school years from 1953 to the present, state whether any standardized tests designed to measure aptitude, ability or suitability for college were administered at the school. If the answer is in the affirmative, state:

- a. The name of the test(s).
- b. A description of the test and the objectives of the test.
- c. The name and address of the author or preparer of the test.
- d. The name and address of the person or organization that scored the test.
- e. The name and official title and address of the person in the school district who had the responsibility for selecting the test to be administered at the school.
- f. The average and median test score for each grade level at the school.

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