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June 30, 1989

Mr. Richard E. Jones JONES & JONES Attorneys at Law 1503 S.E. Quincy Topeka, KS 66612

Brown v. Board of Education, et al.

Dear Rich:

As we discussed, enclosed please find documents containing the information which you requested, specifically:

- The Comparative Report of Percentage of Minority Student Enrollment in U.S.D. No. 501 - Topeka Public Schools - for the 1988-89 School Year; and
- The Minority Staffing Report by building for certificated (CT) and non-certificated (NC) staff of the School District.

It is my understanding that the purpose of providing these documents to you at this time is to assist you and Mr. Lamson in evaluating the remedy which the plaintiffs may seek in this case.

As you will recall, during our last conversation, I sought from you the plaintiffs' position with respect to two specific areas. First, what are plaintiffs seeking in the nature of a remedy in this case, being as specific as the plaintiffs possibly can? Second, do the plaintiffs intend to seek payment of attorney fees, costs and other expenses in this litigation? so, what is your best estimate of the attorney fees, costs and expenses which you will be seeking to date?

The answers to these questions are important to the Board of Education in evaluating its position. While I appreciate that the responses we will receive are not cast in stone, we would appreciate your estimates and suggestions for resolution of this matter.

Mr. Richard E. Jones June 30, 1989 Page Two

Should you need any additional information, please feel free to contact me at any time. I look forward to hearing from you.

Very truly yours,

K. Gary/Sebelius EIDSON,/LEWIS, PORTER & HAYNES

KGS:jdp Enclosures

## COMPARATIVE REPORT OF PERCENTAGE OF MINORITY STUDENT ENROLLMENT IN U.S.D. NO. 501 - TOPEKA PUBLIC SCHOOLS - FOR THE 1988-89 SCHOOL YEAR

	9-20 1988
Dist. Elem. Totals	27.82
Avondale East	44.24
Avondale West	18.05
Belvoir	63.23
Bishop	15.27
Crestview	7.98
Gage	10.63
H.P. Central	39.72
H.P. North	60.84
H.P. South	34.85
Hudson	51.50
Lafayette	60.80
Linn	30.92
Lowman Hill	42.14
Lundgren	17.45
McCarter	12.83
McClure	9.79
McEachron	13.95
Potwin	9.06
Quincy	18.48
Quinton Heights	56.30
Randolph	15.05
Shaner	17.95
State Street	30.52
Stout	28.65
Sumner	30.08
Whitson	8.29
District Middle Schools Totals	28.92 43.9.2 48.92
Chase	39.71
Eisenhower	50.57
French	8.68
Jardine	15.61
Robinson	32.74
	32.74
District Sr. High Totals	27.74
Highland Park High	42.26
Topeka High	31.81
Topeka Nigh Topeka West High	10.60
F How o Sir	

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		70741	CTACC	01	ACK	HISPANIC		ASIAN AM.		AM INDIAN		OTHER		TOTAL MINORITY		MINORITY
	Admin	TOTAL	NC	CT	NC	CT	I NC	CT	NC	CT	NC	CT .	NC	СТ	NC	PERCENT
	177	21.7	10.9	5.0	3.2		.5							5.0	3.7	26
Avondale East	1W			5.0		1.0	.9		,					1.0	1.9	12
Avondale West	1W	17.8	5.9	2.0	1.0	1.0	1.2					2000		3.0	3.0	20
Belvoir	1W	21.0	8.9	3.0	1.8		1.2							2.0	0	7
Bishop	1W	22.0	3.7	1.0		1.0								1.5	.9	6
Crestview	1W	25.5	9.9	1.5	.9									1.5	0	7
Gage	1W	16.0	3.4	1.5										4.0	0	11
Highland Park Centr	l IW	27.5	7.4	3.0		1.0		-				particular design for the second seco		2.7	.9	11
Highland Park North		25.0	6.1	2.0	.9	.7	1 /					- spik		2.0	1.4	10
		25.5	7.2	2.0			1.4							2.0	.3	11
. Highland Park South	1H	16.0	3.5	1.0	.3				-	+				4.0	2.7	19
Hudson	1B	28.0	6.7	2.0	1.9	1.0	.8			-		1000		2.0	2.0	22
Lafayette	1B	13.0	5.0	1.0	1.0		1.0				+			2.0	1.4	12
Linn	1W	21.7	6.0	2.0	1.4							a Proposition of the	-	0	1.7	7
Lowman Hill	1W.	17.4	4.9	er (n. oakka)			1.7							2.5	.4	11
Lundgren			4.5	1.5			.4	1.0			1	-			0	6
McCarter	1W	21.6				1.0								1.5		8
McClure.	1W	19.5	4.0	.5		2.0								2.0	0	
McEachron	1W	18.1		++		1.0								1.0	1.0	12
Potwin	1W	13.5	3.0	1.0	-	1.0	.4							1.0	.4	4
Quincy	1W	23.5	9.2	1.0	<del> </del>		.4							2.0	1.5	15
Quinton Heights	1W	18.0	4.5	2.0	1.1	_	+ • 4	+	+		1			1.0	0	3
Randolph	1W	27.5	4.1	1.0				1.0	+		+			4.0	.3	21
Shaner	1B	18.0	2.3	2.0	.3			1.0		+	+	+	1	1.0	.4	5
State Street	1W	19.0	7.1	1.0			.4		-		+		1.	1.0	0	4
	1W	21.0	3.2		1.0		-			+	+-			4.0	1.9	32
Stout	1B	15.0	3.2	3.0	1.0		.9				-	-		0	1.5	4
Sumner	1W	26.5	10.6				1.5				-	-	-	+ -	1	
Whitson	26	12013						<u> </u>			<u> </u>				1	
TOTAL	1.20															

	Admin	TOTAL	STAFF	T BLACK		I HISPANIC		ASIAN AM.		AM. INDIAN		OTHER		TOTAL MINORITY		HINORITY
	Promisi i	CT	NC	CT	. NC	CT	NC	CT	NC	CT	NC	CT	NC.	CT	I NC	PERCENT
Chase	1W	27.0	13.0	1.0	.8	1.0	3.3		•					2.0	4.1	15
Eisenhower	· 1B	34.5	21.1	5.0	1.7	1.0	.6			1.0	1.0			8.0	3.3	20
French	1W	34.1	18.2	3.0	1.9	2.0		y kayaa y						5.0	1.9	13
Jardine	1W	28.0		1.0	.9		.5							1.0	1.4	5
Landon																
Robinson	1W	37.5	11.6	3.0	2.8	1.0	1.0	1.0						5.0	3.8	17
TOTAL	5															
						160								1		12
Highland Park High	4W 1B	68.8	41.8	5.0	5.3	1.0	3.0					,		7.0	8.3	13
Topeka High	3W 2B	104.1	57.9	8.0	11.5	1.0	3.9	2.0						13.0	15.4	17
Topeka West High	4W 1B	78.0	33.2	2.0		.6	3.0	2.0						5.6	3.0	7
TOTAL													<u> </u>			