

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

OLIVER BROWN, et al.,)
	Plaintiff,)
and)
)
CHARLES and KIMBERLY SMITH,)
minor children, by their mother)
and next friend, LINDA BROWN)
SMITH, et al.,)
	Intervening)
	Plaintiffs,)
)
vs.)
			No. T-316)
)
BOARD OF EDUCATION OF TOPEKA,)
SHAWNEE COUNTY, KANSAS,)
et al.,)
	Defendants.)

**RESPONSE OF UNIFIED SCHOOL DISTRICT NO. 501
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 38
OF THE FOURTH SET AND THIRD REQUEST TO PRODUCE**

38. Other than as discussed in Mr. Gerald Miller's deposition, list every U.S.D. 501 school that has been known by more than one name or has been used in more than one capacity (i.e., elementary school, middle or junior high, high school).

RESPONSE:

Central Park Elementary School/Robinson Middle School

<u>School Year (s)</u>	<u>Name of School</u>	<u>Grades Served</u>
1940-41 thru 1979-80	Central Park Elementary School	K-6
1980-81 thru 1984-85	Robinson Middle School	7-8

Oakland Elementary School/Lundgren Elementary School

<u>School Year (s)</u>	<u>Name of School</u>	<u>Grades Served</u>
1940-41 thru 1945-46	Oakland Elementary School	K-6
1946-47 thru 1949-50	Closed because of fire damage*	None
1950-51 thru 1960-61	Oakland Elementary School	K-6
1961-62 thru 1984-85	Lundgren Elementary School	K-6

*K-3 students attended State Street Elementary School and 4-6 students attended Holliday Junior High School.

Southwest Elementary School/Whitson Elementary School

<u>School Year (s)</u>	<u>Name of School</u>	<u>Grades Served</u>
1952-53 thru 1961-62	Southwest Elementary School	K-6
1962-63 thru 1984-85	Whitson Elementary School	K-6

Avondale Southwest Elementary School/Shaner Elementary School

<u>School Year (s)</u>	<u>Name of School</u>	<u>Grades Served</u>
1959-60	Avondale Southwest School	6-8
1960-61	Avondale Southwest School	5-8
1961-62 thru 1977-78	Avondale Southwest School	K-6
1978-79 thru 1984-85	Shaner Elementary School	K-6

This response was prepared under the direction and supervision of Michael D. Tribbey, Assistant Superintendent - Program Audit and Planning, with the assistance of Ted Clark, Director of Facilities Planning and Gerald A. Miller, Director of Demographic Services.

V E R I F I C A T I O N

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

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

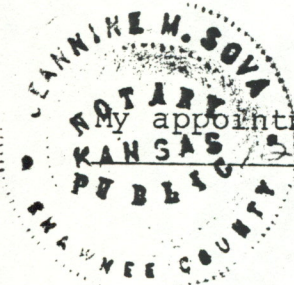
That he is Assistant Superintendent - Program Audit and Planning of Unified School District No. 501, that he has read the foregoing Response of Unified School District No. 501 to Plaintiff-Intervenors' Interrogatory No. 38 of the Fourth Set and Third Request to Produce which was prepared under his general direction and supervision and such response is true and correct to the best of his knowledge and belief.

Further affiant saith not.

Michael D. Tribbey
Michael D. Tribbey

Subscribed and sworn to before me this 15th day of March, 1985.

Leanne M. Sova
Notary Public



My appointment expires: 5-27-85.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing **Response of Unified School District No. 501 to Plaintiff-Intervenors' Interrogatory No. 38 of the Fourth Set and Third Request to Produce** was served by placing same in the United States mail, first class postage prepaid, this 15 day of March, 1985, to attorneys for Intervening Plaintiffs by serving: Christopher A. Hansen, American Civil Liberties Union Foundation, 132 West 43rd Street, New York, N.Y. 10036.

K. Gary Sebelius

K. Gary Sebelius
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Attorneys for Unified
School District No. 501