



been and will have to be reviewed, spanning at least a thirty year time period, and it may be determined that certain information sought is unavailable to the School District.

As the Court recognized in its decision of November 29, 1979, the original trial of this case occurred on June 25 and 26, 1951, and the Court filed its findings of fact, conclusions of law, and opinion on August 3, 1951, holding, among other things, that schools for Black children and schools for White children were comparable in facilities, curricula, courses of study, and quality of teachers. As a result, for the sake of clarity and brevity, those interrogatories or portions thereof which seek information concerning matters occurring prior to the 1950-51 school year are objected to as are irrelevant and not calculated to lead to the discovery of admissible evidence. In addition, such answers as requested by the intervening plaintiffs would be oppressive and unduly burdensome to ascertain.

In addition, the Court in its decision of November 29, 1979, stated that this case was a class action and the class consisted of Black students attending elementary schools in the Topeka School District. See Brown v. Board of Ed. of Topeka, Shawnee County, 84 F.R.D. 383, 394 (D.Kan. 1979). Intervening plaintiffs have filed a motion for class certification seeking to expand the class to include not only Black elementary school students (Kindergarten through 6th grade), but also to include Black middle and high school students as well. The Court has scheduled a hearing on intervening plaintiffs' motion for May 29, 1980. Unless the Court determines that the present class should be expanded to include Black students attending other than the elementary school grades, answers to interrogatories involving grades 7 through 12 would be irrelevant to the issues in the instant case. Accordingly, until it has been determined whether the present class should be expanded, interrogatories involving responses concerning other than the elementary school grades are



objected to on the ground as being irrelevant and would not lead to the discovery of admissible evidence in this case. These general objections apply to all interrogatories or portions thereof which seek information concerning the School District prior to the 1950-51 school year and information concerning grades 7 through 12. The interrogatories which School District personnel have been able to answer to date are set forth below. As soon as an answer to any of the unanswered interrogatories is obtained, it will be served upon counsel for the intervening plaintiffs.

## II. Answers to Interrogatories

With the limitations and the general objections set forth above, the School District answers and/or objects to intervening plaintiffs' interrogatories as follows:

31. Describe the process by which the district determines the school to which a particular teacher is assigned.

ANSWER:

### "ARTICLE XXI ASSIGNMENT AND TRANSFERS

"The Superintendent or his designee shall assign all newly employed teachers to positions for which they are certificated. The Superintendent or his designee shall give notice of assignments to new teachers as soon after employment as practicable.

Where there are jobs (new or existing) determined to be vacant by the Superintendent of Schools during the regular school year they shall be posted in each school building, except after filling the posted vacancy no subsequent vacancy which may result thereafter shall be posted.

Bargaining Unit employees who desire changing grade and/or subject assignment or desire to transfer to another building shall file a written request of such desire with the Personnel Department not later than June 1 of each year. Such statement shall include levels and/or subjects to which he or she desires to be transferred.

The Superintendent of Schools or his designee shall consider all applicants, along with any other applications, and shall assign the posted vacancy to the individual applicant considered by

the Superintendent of Schools to be the most qualified. If there are two or more applicants determined by the Superintendent of Schools to be equally qualified, preference shall be given to the applicant with the most service within the District."

The above quoted material constitutes Article XXI from the Professional Agreement between the School District and NEA-Topeka, Inc. This information was submitted by Frank Ybarra, General Director of Personnel for the School District.

34. Does your school district own or lease a computer?  
(specify)

ANSWER:

The district owns an IBM computer system 370-125 and leases several peripheral devices such as print train and display stations.

The person providing this information is M. J. Belleville, General Director of Data Processing Services for the School District.

35. State whether your school district contracts with an outside agency for computer services to process the district's student enrollment or personnel information; if so, describe those services and estimate the percentage of computerized student enrollment or personnel service you contract out.

ANSWER:

Yes. The services are to maintain class rosters of students receiving special education services. Certain demographic and educational programming education is maintained on approximately 1500 students.

This information was prepared and submitted by Dr. Robert D. Wittman, Coordinator, Student Support Services, of the School District.

36. State whether your school district has its own computer programming department; if so, provide the following information:

a. A description of its structure





4. Health Information
5. Sibling and Other Family Data
6. Enrollment History of Pupil
7. Student Course Enrollment and Grades  
(secondary only)

c. The following reports are produced when requested:

- Summary of enrollments totaling enrollment by schools by grade.
- Summary of USD #501 high school students attending KAVTS.
- Listing of city blocks with no student enrollment.
- ✓ Student enrollment status by block by race.
- ✓ Students who are exceptions to attendance regulation.
- ✓ Student mobility report by school, the number of student moving in and out of each city block by grade.
- Secondary average class size by course subject areas.
- Class rosters for insertion into teachers grade book.
- Student schedule cards.
- ✓ Elementary class size by school.
- Student name and address on mailing labels.
- Student name tags.
- List of school numbers 89 (failed to appear students), 94 (graduating students) and 99 (students leaving the school system) being deleted from the student master file.
- ✓ Audit of students enrolled in school as of September 15.
- Student distribution summary by sex-grade-school.
- ✓ School enrollment summary by block-race-school.
- ✓ Race distribution by elementary and secondary.
- Sibling information.
- Student health information.
- Teacher name and course name from student master file.
- Count and list of courses from hand pre-enrollment.
- Students parents' employer.
- General listing from master file.
- General listing from master and overflow files with address and zip code.
- General listing for school directory.
- Student directory by room.
- Student name, grade and birthday.
- Grade reporting sheets for collecting grades at the schools.
- Teacher listing for grade sheet tally.
- Student grade report cards.
- ✓ Student receiving a special grade.
- Student grade eligibility listing.
- Honor roll by letter grade.
- Grade point average for honor rolls.
- Scholarship cards from grade file.
- Transcript grade labels.
- Socrates process/outputs to schedule students into classes based on a predefined schedule of class offerings.
- FAST process/outputs to score tests and report statistical results for predeveloped and predefined tests.



d. All written records used to update the student data base are returned to demographic services and/or the applicable schools for their selective retention.

Personnel Data Base

a. July 1, 1979 - present

b. Personnel Management and Reporting System provides informational outputs as required.

c. The following reports may be produced when needed/requested:

- Transaction Listing plus Summary  
(To give the user a listing of all data to be used in creating or updating records in the Personnel Master File).
  - Transaction Validation Listing  
(To provide the user with a detail listing of all records to be used as input to the update program, and to indicate any errors detected which would cause rejection of the record).
  - Master Update Maintenance Report  
(To provide an audit trail of the system's processing and to portray all new and changed Master File Data Fields).
  - Profile 1 - Personal Information  
(Display all personal data about an individual)
  - Profile 2 - Job Review Data  
(Display job related information about an individual).
  - Profile 3 - Education and Training  
(Information ranges from schools attended to skills achieved).
  - Salary Performance and Reviews  
(Typical information would be salary change date, amount and percent of change and performance date, rating, and supervisor).
- c. X EEO - 1 Equal Employment Opportunity  
(Summarizes and reports employee population distribution within EEOC Occupation Category, Sex Code, and EEOC Minority Code groupings).
- EEO - 4/5/6 Equal Employment Opportunity  
(Summarizes and reports employee populations distribution by EEOC Occupation Category, Sex Code, and EEOC Minority Code within the following employee type groupings:
    - a. Full-time employee with salary range.
    - b. Part-time/Temporary employee.
    - c. New hired within a user-specified time period.
  - Leave of Absence  
(Indicates any individual on leave with appropriate data concerning the leave of absence displayed).
  - Terminated Employee Report  
(Displays individuals who have been terminated either in a particular reporting period or anyone on file).
  - Personnel Labels  
(Print address labels).
  - Special Reports Generator  
(A quick method of accessing any of the data

fields in the Personnel Records doing calculation, selecting employees and printing that data in a report format.

d. All written records used to update the personnel files are returned to the personnel office for its selective retention.

This information was prepared and submitted by M. J. Belleville, General Director of Data Processing Services.

38. Other than the system named in question No. 37, did you have any computerized student enrollment or personnel systems in effect at any time prior to your answer to this date request. If so, answer question No. 37 separately for each such system, and state the date on which you ceased to use such system.

ANSWER:

"Prior" Employee Data Base

- a. Approximately January 1, 1967 - June 30, 1979
- b. The Employee System was designed to report employee information in the following areas:
  1. Employee personal identification information
  2. Work assignment information
  3. Certificate information
  4. Degree information
  5. Contract information
- c. The following reports were available when requested:
  - Print Employee and Building Cross-Reference Listing.
  - Summer Address Cards.
  - Teachers Certificates Which Expires by Given Date.
  - Print Address Labels.
  - Alphabetical School Directory.
  - School Directory by Building Sequence.
  - Personnel Name Tags by School.
  - Listing of Employees and addresses.
  - Salary Book Listing.
  - Employees Physical Examination Summary.
  - Employees Reaching Retirement Age by 09/01/XX.
  - Personnel Report on Years Experience and Salary.
  - Directory Cards.
  - Personnel Resignation Listing and Tally.
  - Summary of Teaching Equivalencies.
  - Certified Personnel with Selected Subjects Qualification.
  - Personnel Tally by Age, Sex, Salary, and Exemptions.
  - Personnel with 1A Military Status.
  - Salary Listing of Personnel by Classification and Responsibility Codes.
  - Fund Listing of Personnel by Classification and Responsibility Codes.
  - Extra Duty Assignments Reports.
  - Projected Salary Matrix by Class and Group.
  - Contracts Pre-list and Contracts.



d. All written records used to update the employee files were returned to the personnel office for its selective retention.

Information prepared and submitted by M. J. Belleville, General Director Data Processing Services.

39. Does your school district have any computerized files other than those described in question No. 37, which contain student enrollment and/or personnel information (e.g., racial or national origin identity of students, or payroll, work history or other)? If so, list each such file and provide the following information as to each:
- a. The date you started using the file
  - b. The purposes for which you use the file
  - c. Name and describe all reports that have been programmed to be produced from the file
  - d. Name and describe each report which has been generated by the file, and state the date of each

ANSWER:

Yes, the School District does maintain other automated student files.

- a. February 19, 1979.
- b. To maintain class rosters of students receiving special education services which reflect some educational program and demographic information.
- c. Teacher printout - lists special education student by exceptionality, by teacher, by school.  
Alpha List by exceptionality - lists students in exceptionality, alphabetically.  
Age by primary exceptionality - lists numbers of students in each exceptionality by age groups.  
SPSS cross tabular data by exceptionality - lists data on students in various tabular categories by exceptionality.  
Alphabetical listing - lists special education students alphabetically.
- d. All of the reports mentioned in "c" with the exception of the SPSS cross tabular data have been generated on the following dates: 6/29/79; 7/25/79; 10/18/79; 11/28/79; 12/10/79. The SPSS cross tabular data was generated only on 6/29/79.

This information was prepared and submitted by Dr. Robert D. Wittman, Coordinator, Student Support Services.

40. State the names of all superintendents of schools, assistant superintendents of schools and members of the board of education from 1940-1941 school year to the present; and with regard to each person, state:

- a. The period of the person's tenure
- b. The person's last known address and phone number

ANSWER:

This interrogatory is objected to generally for the reasons set forth in the Introduction to these answers. If, however, Interrogatory No. 40 is limited to information to the time period beginning 1950-51 school year to the present, the answer is as follows:

1950-51

Kelsey Petro, Pres.  
 Charles Bennett, V-Pres.  
 Marlin S. Casey  
 Kenneth Hobbs  
 Mrs. David Neiswanger  
 A. H. Saville

1951-52

M. C. Oberhelman, Pres.  
 Jacob A. Dickinson, V-Pres.  
 Charles R. Bennett  
 Marlin Casey  
 Harold E. Conrad (Dr.)  
 Mrs. David Neiswanger

1952-53

M. C. Oberhelman, Pres.  
 Jacob A. Dickinson, V-Pres.  
 Charles R. Bennett  
 Marlin Casey  
 Harold E. Conrad (Dr.)  
 Mrs. David Neiswanger

1953-54

Jacob A. Dickinson, Pres.  
 Charles Sheetz, V-Pres.  
 Harold E. Conrad (Dr.)  
 Richard Greer (Dr.)  
 M. C. Oberhelman  
 Mrs. Ernest A. Shiner

1954-55

Charles Sheetz, Pres.  
 Richard Greer, V-Pres.  
 Gerald K. Barker  
 Jacob A. Dickinson  
 M. C. Oberhelman  
 Mrs. Ernest A. Shiner

1955-56

Richard Greer, Pres.  
 Gerald K. Barker, V-Pres.  
 Mrs. Ernest A. Shiner  
 Robert Schendel  
 Charles Sheetz  
 Gordon Summers (Dr.)

1968-69

R. G. Swenson, Pres.  
 Gordon Summers, V-Pres.  
 Warren Heusted  
 Fred W. Rausch, Jr.  
 Robert Schendel  
 Bob Hurt (resigned 2/17/69)  
 Mrs. Walter Menninger (Connie)  
 (Appointed to fill vacancy effective April 21, 1969)  
 (Elected 4/1/69 for a 4-year term)  
 James E. Woodson  
 (Appointed by Board to fill new position of seventh Board member created by Senate Bill 227. Term: 8/4/69 to 7/1/71)

1969-70

Gordon Summers, Pres.  
 Robert Schendel, V-Pres.  
 Warren V. Heusted  
 Mrs. Walter Menninger (Connie)  
 James E. Woodson  
 R. G. Swenson

1970-71

Robert Schendel, Pres.  
 Fred W. Rausch, Jr., V-Pres.  
 Mrs. Walter Menninger (Connie)  
 James E. Woodson  
 Warren V. Heusted  
 R. G. Swenson  
 Gordon Summers (Dr.)

1971-72

Fred W. Rausch, Jr., Pres.  
 R. G. Swenson, V-Pres.  
 Robert Schendel  
 Mrs. Walter Menninger (Connie)  
 Harry W. Craig, Jr.  
 Mark L. Morris, Jr. (Dr.)  
 Gordon Summers (Dr.)

1972-73

R. G. Swenson, Pres.  
 Mark L. Morris, Jr., V-Pres.  
 Harry W. Craig, Jr.  
 Mrs. Walter Menninger (Connie)  
 Fred W. Rausch, Jr.  
 Robert R. Schendel  
 Gordon Summers



1956-57

Robert Schendel, Pres.  
Gordon Summers, V-Pres.  
Richard Greer  
Mrs. Ernest A. Shiner  
Charles Sheetz  
G. W. Snyder, Jr.

1957-58

Gordon Summers, Pres.  
G. W. Snyder, Jr., V-Pres.  
Robert Schendel  
Fred W. Rausch, Jr.  
Dennis Payne  
Merrill Werts

1958-59

Fred W. Rausch, Jr., Pres.  
Dennis Payne, V-Pres.  
Robert Schendel  
Gordon Summers  
Merrill Werts  
Ray Browning (12/1/58  
-8/3/59)

1959-60

Dennis Payne, Pres.  
Merrill Werts, V-Pres.  
Dale Buchanan  
Fred W. Rausch, Jr.  
Robert Schendel  
Gordon Summers

1960-61

Merrill Werts, Pres.  
Dale Buchanan, V-Pres.  
Dennis Payne  
Fred W. Rausch, Jr.  
Robert Schendel  
Gordon Summers

1961-62

Dale Buchanan, Pres.  
Gordon Summers, V-Pres.  
Dennis Payne  
Fred W. Rausch, Jr.  
Robert Richardson  
Robert Schendel

1962-63

Gordon Summers, Pres.  
Robert Richardson, V-Pres.  
Dale Buchanan  
Dennis Payne  
Fred W. Rausch, Jr.  
Robert Schendel

1963-64

Robert Richardson, Pres.  
Robert Schendel, V-Pres.  
Warrent Heusted  
Dennis Payne  
Fred W. Rausch, Jr.  
Gordon Summers

1973-74

Mark L. Morris, Jr., Pres.  
(Pos. 7)  
Harry W. Craig, Jr., V-Pres.  
(Pos. 6)  
T. C. Anderson (Pos. 2)  
Fred W. Rausch, Jr. (Pos. 1)  
Robert Schendel (Pos. 4)  
Wayne T. Stratton (Pos. 3)  
Gordon Summers (Pos. 5)

1974-75

Harry W. Craig, Jr., Pres.  
(Pos. 6)  
Wayne T. Stratton, V-Pres.  
(Pos. 3)  
T. C. Anderson (Pos. 2)  
Mark L. Morris, Jr. (Pos. 7)  
Fred W. Rausch, Jr. (Pos. 1)  
Robert Schendel (Pos. 4)  
Gordon Summers (Pos. 5)

1975-76

Wayne T. Stratton, Pres.  
(Pos. 3)  
T. C. Anderson, V-Pres.  
(Pos. 2)  
Harry W. Craig, Jr. (Pos. 7  
--changed numbers with Mark L.  
Morris, Jr. to be at-large  
member)  
Samuel P. Hurd (Pos. 5)  
Mark L. Morris, Jr. (Pos. 6)  
Don Oden (Pos. 4)  
Fred W. Rausch, Jr. (Pos. 1)

1976-77

T. C. Anderson, Pres. (Pos. 2)  
Samuel P. Hurd, V-Pres.  
(Pos. 5)  
Harry W. Craig, Jr. (Pos. 5)  
Mark L. Morris, Jr. (Pos. 6)  
Don Oden (Pos. 4)  
Fred W. Rausch, Jr. (Pos. 1)  
Wayne T. Stratton (Pos. 3)

1977-78

Samuel P. Hurd, Pres. (Pos. 5)  
Don Oden, V-Pres. (Pos. 4)  
Richard A. Crawford (Pos. 7)  
(Appointed to fill vacancy  
effective June 22 due to  
resignation of Harry Craig)  
Joe Douglas, Jr. (Pos. 1)  
Mark L. Morris, Jr. (Pos. 6)  
Duane F. Pomeroy (Pos. 2)  
Gordon Shelby (Pos. 3)

1964-65

Robert Schendel, Pres.  
Warren Heusted, V-Pres.  
Dennis Payne  
Fred W. Rausch, Jr.  
Robert Richardson  
Gordon Summers

1965-66

Warrent Heusted, Pres.  
Bob Hurt, V-Pres.  
Fred W. Rausch, Jr.  
Robert Schendel  
Gordon Summers  
R. G. Swenson

1966-67

Bob Hurt, Pres.  
Fred W. Rausch, Jr., V-Pres.  
Warren Heusted  
Robert Schendel  
Gordon Summers  
R. G. Swenson

1967-68

Fred W. Rausch, Jr., Pres.  
R. G. Swenson, V-Pres.  
Warren Heusted  
Bob Hurt  
Robert Schendel  
Gordon Summers

1978-79

Don Oden, Pres. (Pos. 4)  
Gordon Shelby, V-Pres.  
(Pos. 3) (Resigned 5/21/79  
due to transfer to  
Hattiesburg, Mississippi)  
Ross R. Freeman (Pos. 3)  
(Appointed by Board 6/13/79 to  
complete Shelby's term through  
6/30/79)  
Richard A. Crawford (Pos. 7)  
Joe Douglas, Jr. (Pos. 1)  
Mark L. Morris, Jr. (Pos. 6)  
Duane F. Pomeroy (Pos. 2)  
Samuel P. Hurd (Pos. 5)

1979-80

Duane F. Pomeroy, Pres.  
(Pos. 2)  
Joe Douglas, Jr., V-Pres.  
(Pos. 1)  
Peggy Boggs (Pos. 5)  
Ross R. Freeman (Pos. 3)  
Don Oden (Pos. 4)  
Ronald F. Taylor (Pos. 7)  
Pat (Patricia) Thompson  
(Pos. 6)

TOPEKA BOARD OF EDUCATION  
1979-80

Mr. Duane F. Pomeroy, President  
1412 West 5th  
Topeka, Kansas 66606  
(1977-81)

Mr. Joe Douglas, Jr., Vice-President  
1811 Indiana  
Topeka, Kansas 66607  
(1977-81)

Mrs. Peggy M. Boggs  
227 Woodlawn  
Topeka, Kansas 66606  
(1979-83)

Mr. Ross R. Freeman  
700 Harrison  
Topeka, Kansas 66636  
(1979-81)

Mr. Don Oden  
1112 East 19th Street  
Topeka, Kansas 66607  
(1975-83)



Mr. Ronald F. Taylor  
4000 Holly Lane  
Topeka, Kansas 66604  
(1979-83)

Mrs. Patricia E. Thompson  
1804 Campbell Avenue  
Topeka, Kansas 66604  
(1979-83)

ADDRESSES OF FORMER TOPEKA BOARD OF EDUCATION MEMBERS  
1950 - 1979

Mr. Kenneth B. Hobbs  
130 N. Broadmoor  
Topeka, Kansas 66606

Dr. Richard Greer  
2750 Burlingame Road  
Topeka, Kansas 66611

Mr. G. W. Snyder, Jr.  
4701 West 21st  
Topeka, Kansas 66607

Mr. Dale Buchanan  
1520 Indian Trail  
Topeka, Kansas 66604

Mr. Dennis C. Payne  
Route 1  
Topeka, Kansas 66604

Mr. Warren V. Heusted  
2807 S. W. Osborn  
Topeka, Kansas 66614

Mr. James E. Woodson  
2615 S. W. Filmore  
Topeka, Kansas 66608

Mrs. Connie Menninger  
1505 S.W. Plass  
Topeka, Kansas 66604

Mr. R. G. Swenson  
1912 Westwood Drive  
Topeka, Kansas 66604

Dr. Gordon Summers  
2324 Indian Trail  
Topeka, Kansas 66614

Mr. Robert R. Schendel  
1611 Brooklyn  
Topeka, Kansas 66611

Mr. Wayne T. Stratton  
3128 West 17th Street  
Topeka, Kansas 66604

Mr. Fred W. Rausch, Jr.  
2030 Briarwood Drive  
Topeka, Kansas 66611

Mr. Harry W. Craig, Jr.  
3335 S.W. Dukeries Road  
Topeka, Kansas 66614

Mr. T. C. Anderson  
2214 S. W. 15th  
Topeka, Kansas 66604

Mr. Robert A. Richardson  
1911 Bowman Court  
Topeka, Kansas 66604

Mr. Gerald K. Barker  
833 Plass  
Topeka, Kansas 66606

Mr. Charles R. Bennett  
74 S. W. Pepper Tree Lane  
Topeka, Kansas 66618

Mr. Charles J. Sheetz  
227 N. W. 35th  
Topeka, Kansas 66617

Mr. Kelsey H. Petro  
4712 West Sixth  
Topeka, Kansas 66606

Mr. Bob Hurt  
Pheonix Republic  
P.O. Box 1950  
Phoenix, Arizona 85004

Mr. Merrill H. Werts  
1228 Miller Drive  
Junction City, Kansas 66441

Mr. Ray Browning  
328 Woodlawn Avenue  
Topeka, Kansas 66606

Dr. Mark L. Morris, Jr.  
140 Fairlaw Road  
Topeka, Kansas 66606

Mr. Gordon Shelby  
204 Wildwood Trace  
Hattiesburg, Mississippi 39401

Mr. Richard Crawford  
1920 Pembroke Lane  
Topeka, Kansas 66604

Mr. Samuel P. Hurd  
217 Greenwood  
Topeka, Kansas 66606

TOPEKA PUBLIC SCHOOLS SUPERINTENDENTS  
1950 - 1980

August 1, 1942 - July 31, 1951

Dr. Kenneth W. McFarland  
3127 Huntoon  
Topeka, Kansas 66604

August 6, 1951 - July 31, 1961

Mr. Wendell R. Godwin  
1823 Collins  
Topeka, Kansas 66604

August 7, 1961 - March 11, 1962

Mr. M. J. Whitson (Deceased)

March 14, 1962 - July 1, 1962

Dr. Harold Blackburn  
Regional Commissioner of Education, Region VII  
Department of Health, Education & Welfare  
Federal Building, 601 East 12th  
Kansas City, Missouri 64106  
(Dr. Harold Blackburn was appointed acting  
superintendent due to the death of Mr. Whitson)

July 2, 1962 - June 13, 1975

Dr. Merle R. Bolton  
7121 Fountaindale Road  
Topeka, Kansas 66614

June 16, 1975

Dr. James M. Gray  
2036 West 30th Street  
Topeka, Kansas 66611

This information was collected from minutes of the Board of Education which are kept by the Clerk of the Board of Education, and from a series of photographs of former superintendents kept in the Public Information Office. The list of addresses submitted above are for current board members and former board members still living. Those working on developing this response were Kay Oliver, Secretary; Kathryn Young, Secretary; Jan Long, Secretary; Barbara Kudlacek, Director of Public Information.



*K. Gary Sebelius*

K. GARY SEBELIUS  
of Eidson, Lewis, Porter & Haynes  
1300 Merchants National Bank Bldg.  
Topeka, Kansas 66612  
(913) 233-2332  
Attorneys for Unified  
School District No. 501

VERIFICATION

STATE OF KANSAS        )  
                                  )    ss:  
COUNTY OF SHAWNEE    )

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

That he is Associate Superintendent, Management Services for Unified School District No. 501, that he has read each of the foregoing answers to intervening plaintiffs' interrogatories, which were prepared under his general direction and supervision and such answers are true and correct to the best of his knowledge and belief.

Further Affiant saith not.

*Don R. O'Neil*

\_\_\_\_\_  
DON R. O'NEIL

Subscribed and sworn to before me this 28 day of April, 1980.



*Tina M. Fay*

\_\_\_\_\_  
Notary Public

my appointment expires:  
4-24-83

CERTIFICATE OF SERVICE

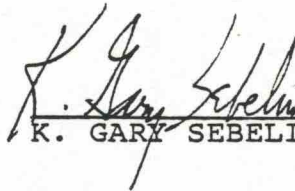
The undersigned hereby certifies that a true and correct copy of the above and foregoing Answers to Interrogatories were served by depositing same in the United States mail, first class postage prepaid, this 28<sup>th</sup> day of April, 1980, addressed to:

Charles S. Scott  
724 1/2 Kansas Avenue  
Topeka, Kansas 66603

Charles S. Scott, Jr.  
724 1/2 Kansas Avenue  
Topeka, Kansas 66603

Richard E. Jones  
724 1/2 Kansas Avenue  
Topeka, Kansas 66603

Joseph Johnson  
820 Quincy  
Topeka, Kansas 66603

  
K. GARY SEBELIUS