

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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ANSWER OF UNIFIED SCHOOL DISTRICT NO. 501  
TO PLAINTIFF-INTERVENORS' INTERROGATORY NO. 1  
OF THE SECOND SET

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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 benefiting from programs under Title I.

ANSWER:

The schools that received the aid or service provided by various Title I programs in the years in which such aid or service was received are set forth in answer to Interrogatory No. 14 of Intervening Plaintiffs' Interrogatories-First Set Attached hereto is the response of Unified School District No. 501 to the remainder of Interrogatory No. 1 which was prepared under the direction and supervision of W. Wayne Warner, Assistant Superintendent for Business Services for Unified School District No. 501, with the assistance of the following employees of the District: Mayme Weir, Instructional Specialist for Language Arts, Coordinator of Title I for the District and Wilmer Moffet, Resource Advisor for Title I.

In answer to this interrogatory, data concerning salaries of Title I personnel (teachers and educational assistants) by school for the years of 1974-1981 and the data indicating the number of children served through the Title I program by school for the years 1975-1981 have been included. The amount of money expended on equipment and supplies for the Title I program has not been maintained separately for each school building. Data for previous years is not available as the District is required by law to maintain such records for five years only. It should also be noted that the District does not have data on children served at Quincy Elementary School during the 1976-77 and 1977-78 academic years.

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:

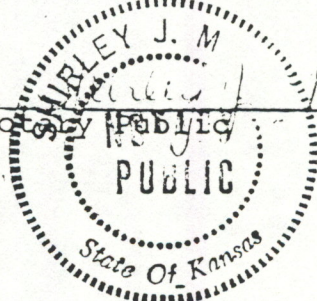
That he is Assistant Superintendent for Business Services for Unified School District No. 501, that he has read the answer to Interrogatory No. 1 of Intervening Plaintiffs' Interrogatories --Second Set which was prepared under his general direction and supervision and such answer is true and correct to the best of his knowledge and belief.

Further affiant saith not.

*W. Wayne Warner*  
 \_\_\_\_\_  
 W. Wayne Warner

Subscribed and sworn to before me this 27<sup>th</sup> day of March, 1982.

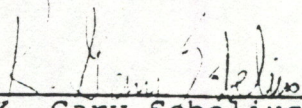
Notary Public  
 \_\_\_\_\_  
*Mirley J. M. Winters*



my appointment expires:  
 \_\_\_\_\_

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. 1 OF THE SECOND SET was served by hand delivering the same this 30th day of March, 1982, to attorneys for Intervening Plaintiffs by serving Richard Jones, 605 S.E. Quincy, Suite 1, Topeka, Kansas 66603.

  
\_\_\_\_\_  
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

TITLE I SALARIES BY SCHOOLS FOR 1974-1981

		1974-75	1975-76	1976-77	1977-78	1978-79	1979-80	1980-81
Dundale East	T	9044.00	14,194.00	15,919.00	16,344.00	20,552.75	11,007.69	12,163.50
	EA	N/A	6,552.00	*3,868.80	4,103.61	7,464.27	12,984.00	16,433.95
Favor	T	N/A	*9,540.00	19,300.00	15,755.00	17,011.34	18,241.63	27,339.96
	EA	*3,494.40	8,611.20	7,238.40	8,111.35	10,725.97	11,980.47	13,398.06
Central Park	T	7,100.00	5,294.00	5,844.00	10,350.00	10,937.56	11,803.19	---
	EA	7,123.20	3,369.60	3,556.80	3,808.35	4,014.40	4,767.10	---
Day	T	3,825.00	---	---	---	---	---	---
	EA	1,747.20	---	---	---	---	---	---
Dunt	T	N/A	7,900.00	5,270.00	---	---	---	---
	EA	N/A	6,614.40	6,901.44	---	---	---	---
P. Central	T	N/A	8,850.00	9,850.00	9,500.00	10,187.00	10,893.69	12,027.03
	EA	7,526.40	11,232.00	11,793.60	9,213.74	8,781.50	14,301.30	16,145.42
P. North	T	7,750.00	8,750.00	10,640.00	11,240.00	11,827.56	12,648.49	14,066.08
	EA	N/A	7,800.00	*4,842.24	6,191.30	8,530.60	9,471.47	16,233.23
Elson	T	8,010.00	9,010.00	8,700.00	9,300.00	10,387.56	10,793.69	13,564.06
	EA	3,091.20	3,120.00	3,307.20	3,539.45	4,014.40	4,516.20	9,885.46
Layette	T	7,100.00	12,250.00	25,013.00	22,443.00	24,093.12	23,415.22	26,571.41
	EA	15,187.20	16,598.40	6,988.80	10,929.70	12,795.90	14,301.30	14,953.64
Woman Hill	T	7,450.00	8,450.00	9,550.00	10,150.00	10,737.56	11,482.19	12,777.32
	EA	3,628.80	6,489.60	7,330.80	7,782.77	7,718.77	9,722.37	10,663.25
Wlgren	T	7,100.00	4,150.00	9,100.00	9,800.00	15,797.56	16,875.39	18,605.30
	EA	3,897.60	3,868.80	4,118.40	4,361.17	4,829.82	5,331.62	12,131.02
Broe	T	4,370.00	---	---	---	---	---	---
	EA	N/A	---	---	---	---	---	---
Ddale	T	8,792.00	9,792.00	9,910.00	9,200.00	---	---	---
	EA	3,494.40	9,360.80	6,739.20	6,711.90	---	---	---
K	T	3,825.00	4,325.00	4,775.00	5,075.00	5,368.78	---	---
	EA	1,747.20	3,494.40	3,681.60	3,473.60	5,428.80	---	---
ncy	T	7,450.00	8,450.00	14,170.00	20,640.00	11,727.56	17,383.13	18,981.01
	EA	7,526.40	10,608.00	11,169.60	11,904.40	13,109.52	13,899.86	16,672.31

		1974-75	1975-76	1976-77	1977-78	1978-79	1979-80	1980-81
Anton Heights	T	4,370.00	4,325.00	4,775.00	5,075.00	5,368.78	11,482.18	19,420.68
	EA	3,360.00	3,369.60	3,566.80	3,783.55	4,492.80	10,142.80	11,227.78
Be	T	7,450.00	8,450.00	9,550.00	10,050.00	10,687.56	11,432.20	12,621.70
	EA	*3,091.00	6,614.40	6,988.80	5,815.05	6,372.86	7,125.56	10,449.99
ite Street	T	N/A	13,160.00	10,010.00	10,150.00	10,737.56	11,482.19	11,572.32
	EA	9,811.20	6,364.00	7,425.60	7,493.85	8,405.15	9,408.75	10,525.26
inner	T	7,450.00	8,450.00	9,550.00	10,050.00	15,449.56	16,517.03	18,230.31
	EA	3,897.60	6,864.00	7,300.80	7,782.77	7,718.77	9,722.37	10,889.06
well	T	†	†	†	†	†	†	---
	EA	*6,182.40	10,046.40	*9,672.00	10,606.70	13,611.32	14,364.02	---
ise	T	---	---	---	---	---	---	11,690.56
	EA	---	---	---	---	---	---	21,263.78
ne	T	†	---	---	---	---	---	---
	EA	N/A	---	---	---	---	---	---
tis	T	†	---	---	---	---	---	---
	EA	8,064.00	---	---	---	---	---	---
† Topeka	T	†	†	†	†	†	†	---
	EA	10,080.00	10,108.80	14,976.00	10,600.77	13,297.70	14,364.02	---
nhower	T	---	---	---	†	†	†	†
	EA	---	---	---	10,856.50	12,921.35	14,426.75	20,912.52
Inland Park	T	†	†	†	†	†	†	---
	EA	*3,628.80	10,196.16	*7,550.40	8,653.05	11,541.40	14,050.40	---
iday	T	†	†	†	†	†	†	---
	EA	*3,494.40	11,793.60	*8,049.60	12,015.14	9,283.30	8,279.70	---
inson	T	---	---	---	---	---	---	†
	EA	---	---	---	---	---	---	26,495.04
sevelt	T	†	†	†	†	†	†	---
	EA	3,763.20	7,488.00	15,288.00	12,644.45	13,548.60	13,172.25	---

T = Teachers' salaries

EA = Educational Assistants' salaries

N/A = information not available

\* = more money was expended, but payroll records do not show it

† = no teachers at junior high level

Report prepared by: Wilmer Moffet

NUMBER OF STUDENT PARTICIPANTS

Schools	1975-76	1976-77	1977-78	1978-79	1979-80	1980-81
Avondale East	87	101	50	88	66	73
Belvoir	90	112	76	89	93	63
Central Park	41	63	31	49	58	
Grant	46	120				
H.P. Central	66	91	106	108	71	86
H.P. North	90	76	53	73	85	75
Hudson	42	66	34	48	55	82
Lafayette	110	101	71	99	122	135
Lowman Hill	83	59	50	65	54	71
Lundgren	30	46	42	40	48	55
Parkdale	69	84	19			
Polk	45	42	40	47		
Quincy	81	*	*	189	96	110
Quinton Heights	42	52	30	44	80	70
Rice	56	42	39	54	46	36
State Street	84	86	58	63	69	63
Sumner	59	77	55	92	69	59
Boswell	71	152		95	34	
Chase						162
East Topeka	157	171	113	181	131	
Eisenhower			42	128	129	217
Highland Park	172	177	40	91	42	
Holliday	61	131	108	159	136	
Robinson						108
Roosevelt	159	137	61	123	141	

\* Not available