



National Headquarters
132 West 43 Street
New York, NY 10036
(212) 944 9800

Norman Dorsen
PRESIDENT

Ira Glasser
EXECUTIVE DIRECTOR

E. Richard Larson
STAFF COUNSEL

November 14, 1983

William Lamson
704 Windward Road
Jackson, MS 39206

Re: Brown III

Dear Bill:

As you know, we had been faced with an unmet, court-ordered deadline of August 1, 1983 within which to file our answers to the school board's first (what is our case) interrogatories. Based upon the tardiness of the school board in answering our interrogatories, opposing counsel disregarded the court order by informally stipulating to a November 1 date for our answers. That deadline too, of course, was ignored.

Enter the court, which scheduled a November 8 status conference to establish further deadlines based upon our obviously not having answered the school board's first interrogatories. Right. Anyway, I humbled myself terrifically, placed most of the blame on you (I understand from Caldwell that such is common practice), and somehow obtained a new extension to April 15, 1984. This means that we now have at least some time to try to put our case together.

I recognize your full-time involvement in Cincinnati these days. Nonetheless I hope that I can obtain a huge block of your time shortly after February 1 and some of your time before then; and that, if the Cincinnati trial is postponed, I can obtain considerable amounts of your time prior to February 1. Anyway, let's see how things develop.

In the meantime, enclosed for your Brown III file is our tentative statistical analysis of the racial identifiability of the Topeka schools based on a 15% variance. Also enclosed is a copy (another copy?) of the school board's first interrogatories to us.

I no doubt will speak with you soon.

Sincerely,

E. Richard Larson

I fully hope that you did not behave yourself in California!